

# Exhibit 31



**KENTUCKIANA**  
— COURT REPORTERS —

**CASE NO. 19-CV-01717**

**WATTS COORDINATED PRETRIAL PROCEEDINGS, ET AL.**

**V.**

**KALLATT MOHAMMED, ET AL.**

**DEPONENT:**

**CALVIN RIDGELL, VOL. II**

**DATE:**

**March 19, 2024**



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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF  
3                   ILLINOIS EASTERN DIVISION  
4                   JUDGE FRANKLIN U. VALDERRAMA  
5                   MAGISTRATE JUDGE SHEILA M. FINNEGAN  
6                   CASE NO. 19-CV-01717  
7  
8

9                   WATTS COORDINATED PRETRIAL PROCEEDINGS, ET AL.,  
10   Plaintiffs  
11

12   V.  
13

14                   KALLATT MOHAMMED, ET AL.,  
15   Defendants  
16  
17  
18  
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22

23                   DEPONENT: CALVIN RIDGELL, VOL. II

24                   DATE: MARCH 19, 2024

25                   REPORTER: OLIVIA M. SIS

<p style="text-align: right;">Page 102</p> <p>1 that?</p> <p>2 A. Right.</p> <p>3 Q. Okay. Do you know what that means?</p> <p>4 A. No.</p> <p>5 Q. Okay. Did you witness something in relation</p> <p>6 to this arrest on June 18, 2004?</p> <p>7 A. I don't -- can't recall.</p> <p>8 Q. You can't recall if you --</p> <p>9 A. Yeah.</p> <p>10 Q. And from reviewing this report, can you tell</p> <p>11 if you had any -- I'm sorry. From reviewing this</p> <p>12 report, can you tell what your role was in this arrest?</p> <p>13 A. I think I can see this -- this is some normal</p> <p>14 stuff they do in the line.</p> <p>15 Q. I'm sorry?</p> <p>16 A. I said, only thing I can -- that is some of</p> <p>17 the normal activity that goes on in this line. When you</p> <p>18 try to get to the front of the line, or the person who's</p> <p>19 selling, that's the only -- I can remember that's --</p> <p>20 that's some of the stuff that goes on.</p> <p>21 Q. Oh. So the narrative described in this vice</p> <p>22 case report rings true to you?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. But you don't have a specific</p> <p>25 recollection of the incident described here?</p>	<p style="text-align: right;">Page 104</p> <p>1 A. To get the -- the person who's distributing</p> <p>2 the drugs. You try to get up there and get to him, get</p> <p>3 to the person who's selling --</p> <p>4 Q. And you'd arrest the person who's selling?</p> <p>5 A. Right. Sometime we'll get -- when we can see</p> <p>6 clear, we'll grab some of the -- the people who bought,</p> <p>7 so...</p> <p>8 Q. Some of the buyers?</p> <p>9 A. Yeah. We'll grab them, too.</p> <p>10 Q. And to be clear, you're telling me about</p> <p>11 things that you generally remember? You're not telling</p> <p>12 me about this --</p> <p>13 A. Yeah. No. No. I'm just saying this -- this</p> <p>14 has been known.</p> <p>15 Q. Right. Okay.</p> <p>16 A. Just -- I don't --</p> <p>17 Q. But the incident that -- with Mr. Carter's</p> <p>18 arrest on June 18, 2004 is not one you specifically</p> <p>19 remember?</p> <p>20 A. Can't -- I can't say I can remember.</p> <p>21 Q. And this lists two other men, Jamon Walker and</p> <p>22 Roy Tate [sic], who were arrested at the same time for</p> <p>23 trespassing. Did you see that on the vice case report?</p> <p>24 A. Yes, I see it. Right.</p> <p>25 Q. Do you remember those names?</p>
<p style="text-align: right;">Page 103</p> <p>1 A. No.</p> <p>2 Q. And you -- based on reading the report, are</p> <p>3 you able to say what your role was in this arrest?</p> <p>4 A. No. I don't remember what the role was,</p> <p>5 especially if it was a line because they're known to</p> <p>6 have lines down there like that.</p> <p>7 Q. I'm sorry? They --</p> <p>8 A. They've been known to have lines. You line up</p> <p>9 and try to get to the person who's selling to the</p> <p>10 people.</p> <p>11 Q. So as an officer in Public Housing South, it</p> <p>12 was usual to see a line of people waiting to buy drugs;</p> <p>13 is that right?</p> <p>14 A. Yes. That's --</p> <p>15 Q. And were -- there were instances like that</p> <p>16 where you and the officers with you made arrests after</p> <p>17 seeing the line?</p> <p>18 A. Sometimes we would get in the line to try to</p> <p>19 get to the -- to the person. You know, we'll get in the</p> <p>20 line, the drug line, and just --</p> <p>21 Q. Pretending to be people who wanted to buy</p> <p>22 drugs?</p> <p>23 A. Right. Hide in there with them and get up</p> <p>24 there and get him, so...</p> <p>25 Q. And get up there and --</p>	<p style="text-align: right;">Page 105</p> <p>1 A. No.</p> <p>2 Q. Did you look at mugshots of those two people?</p> <p>3 I'll show them to you if you haven't seen them.</p> <p>4 A. Don't remember. Yeah.</p> <p>5 MR. FLAXMAN: Okay. I think we're at 43,</p> <p>6 City-BG-060021. And this is a mugshot of Tate Roy.</p> <p>7 (EXHIBIT 43 MARKED FOR IDENTIFICATION)</p> <p>8 BY MR. FLAXMAN:</p> <p>9 Q. Does seeing that picture refresh your</p> <p>10 recollection about Mr. Tate? Is that somebody you</p> <p>11 remember seeing?</p> <p>12 A. No.</p> <p>13 MR. FLAXMAN: All right. Let's mark</p> <p>14 Exhibit 44. This one is City-BG-060019.</p> <p>15 (EXHIBIT 44 MARKED FOR IDENTIFICATION)</p> <p>16 BY MR. FLAXMAN:</p> <p>17 Q. You see the top, it says, "Mugshot for Jamon,"</p> <p>18 J-A-M-O-N, "L. Walker"? See that at the top?</p> <p>19 A. Yeah.</p> <p>20 Q. Okay. And does the picture of Mr. Walker look</p> <p>21 familiar to you?</p> <p>22 A. No.</p> <p>23 Q. You don't have any recollection of Mr. Walker</p> <p>24 or Mr. Tate?</p> <p>25 A. No.</p>

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1 Q. And fair to say that looking at these  
2 documents about this arrest of Mr. Carter hasn't  
3 refreshed your recollection of that arrest?  
4 A. No.  
5 Q. Are you aware of anything else that would help  
6 you remember that arrest?  
7 A. It's so old, I don't -- whatever you give me  
8 at this point -- this -- this arrest from when?  
9 Q. Yeah. I'm asking you about an arrest in 2004.  
10 A. Just -- would be almost impossible. I  
11 wouldn't even know these people if you showed them to me  
12 today.  
13 Q. Okay. You can put those exhibits aside. Do  
14 you recall testifying on the first day of your  
15 deposition that Sergeant Gus Vasilopoulos discouraged  
16 you from filing a complaint about Jason Brown and Marty  
17 Sommerville?  
18 A. Yes. Vasilopoulos.  
19 Q. I have that V-A-S --  
20 A. Vasilopoulos. Vasilopoulos. I always mess it  
21 up, too. Vasilopoulos.  
22 Q. Let me tell you what I think. You tell me if  
23 I'm spelling it right. I think it's  
24 V-A-S-I-L-O-P-O-U-L-O-S?  
25 A. That's -- yeah, it's close.

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1 Q. Okay. And what did he tell you when he  
2 discouraged you from filing a complaint?  
3 A. He said, you know, "If I -- you know, Cal, if  
4 you say anything about these guys, they're going to  
5 throw you out the unit." And I said, "They're going to  
6 throw me out my unit?" He said, "Yeah, they'll throw  
7 you out of your unit, you know." And -- and I said,  
8 "Even though they jumped me, they're going to throw me  
9 out the unit?" He was like, "Well, yeah, they're going  
10 to throw you out the unit if you say something about  
11 these guys." And I asked him, "Do you know them?" And  
12 he said he knew one of them. He didn't know the other  
13 one, but he knew Jason Brown, so...  
14 Q. Was Vasilopoulos your sergeant?  
15 A. Yes.  
16 Q. And --  
17 A. And their sergeant was named James Sanchez.  
18 Q. Did you ever make a complaint against Sergeant  
19 Vasilopoulos?  
20 A. No, I didn't. I just told in my letter that I  
21 sent to all the people who investigate stuff like that  
22 -- I just sent a -- a mass letter, and he was -- he was  
23 in there, about that incident. And then when I went to  
24 the union and told them, they was the one that  
25 encouraged me to do it and said it would generate a CR

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1 number. But when I did that, I didn't -- I didn't see  
2 anything happen, so...  
3 Q. When you -- how did you send that letter?  
4 A. Through the department e-mail, and I  
5 distributed it and had them to -- to mark if read, if  
6 they see it. If they seen it, they'll mark that they  
7 read it. So I sent it like that to a lot of the -- the  
8 bosses.  
9 Q. Did anybody respond to you about that letter?  
10 A. Verbal. Some of them, I -- I talked to  
11 verbally that said they would -- said they were going to  
12 do something. They was looking at it. They --  
13 everybody that I -- I sent stuff to, they said they'll  
14 look into it, just like the other incident in 2014.  
15 Everybody said they'll look at it. They see it.  
16 They're going to -- they're in the background, and  
17 you're going to be okay. None of that happened.  
18 Q. Besides Sergeant Vasilopoulos, did anyone else  
19 discourage you from making a complaint about Brown and  
20 Sommerville?  
21 A. It was just -- it was just him and their  
22 sergeant, Sanchez.  
23 Q. What did Sanchez say to you?  
24 A. That -- you know, "Calvin, just, you know, let  
25 them apologize. Let them apologize to you, and -- and

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1 -- and -- and -- and just don't do anything about it.  
2 It's -- they're not going to come after you again." And  
3 I kept saying they're going to come after me again. And  
4 they said I was paranoid, that they wasn't going to come  
5 after me.  
6 Q. Did Sanchez tell you there might be  
7 consequences from you complaining?  
8 A. Yes.  
9 Q. What did he tell you?  
10 A. He told me to leave it alone.  
11 Q. Did he tell you that there were specific  
12 consequences that might happen to --  
13 A. He didn't say -- he didn't say what -- what  
14 was going to happen, but I did find out later that they  
15 came.  
16 Q. And you -- what you're referring to is the  
17 investigation about the --  
18 A. The 2014, when they came and put a  
19 confidential CR number on me and tried to tie me into a  
20 criminal enterprise.  
21 Q. And you believe that that investigation was  
22 retaliation for complaining about Brown and Sommerville?  
23 A. Yes, because people who worked over there  
24 saying they were still mad about it, that they just got  
25 a pat on the hand. I was like, why would they be mad at