

## **Exhibit 2**



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# Transcript of Kallatt Mohammed, Cont.

**Date:** November 21, 2019  
**Case:** Watts Coordinated Cases

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re: WATTS COORDINATED : Master Docket  
CASES. : Case No. 19-cv-01717

## Videotaped Deposition of

KALLATT MOHAMMED, II, Volume II

Chicago, Illinois

Thursday, November 21, 2019

10:06 a.m.

Job No.: 266048

Pages: 191 - 385

Reported by: Melanie L. Humphrey-Sonntag,  
CSR, RDR, CRR, CRC, FAPR

## Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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1 A Take the Fifth. 10:29:17

2 Q Were you involved in arresting William 10:29:18

3 Carter on March 3rd, 2004? 10:29:21

4 A Take the Fifth. 10:29:22

5 Q Was Ronald Watts present for the arrest of 10:29:23

6 William Carter on March 3rd, 2004? 10:29:25

7 MR. KOSOKO: Objection; foundation, form 10:29:27

8 of the question. 10:29:29

9 A Take the Fifth. 10:29:29

10 Q Did you see William Carter on March 3rd, 10:29:30

11 2004, at about 5- -- excuse me -- at about -- 10:29:34

12 excuse me. 10:29:38

13 Did you see William Carter on March 3rd, 10:29:39

14 2004, at about 5:05 p.m. holding a clear 10:29:41

15 plastic bag? 10:29:45

16 A Take the Fifth. 10:29:45

17 Q Is the statement in the report that police 10:29:47

18 saw William Carter holding in his hand a clear 10:29:53

19 plastic bag on March 3rd, 2004, at about 5:05 p.m. 10:29:56

20 a false statement? 10:29:59

21 MR. BAZAREK: Object to the form of the 10:30:00

22 question, foundation, mischaracterizes the 10:30:01

23 evidence in the record in this case. 10:30:03

24 MR. MICHALIK: Join. 10:30:05

## Transcript of Kallatt Mohammed, Cont.

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1	MR. SCHALKA: Join.	10:30:05
2	MR. KOSOKO: Join.	10:30:06
3	A Take the Fifth.	10:30:06
4	Q Did you see William Carter on March 3rd,	10:30:08
5	2004, at about 5:05 p.m. run from police officers?	10:30:10
6	A Take the Fifth.	10:30:14
7	Q Is the statement in the report that police	10:30:15
8	officers saw William Carter run from police on	10:30:17
9	March 3rd, 2004, at about 5:05 p.m. a false	10:30:20
10	statement?	10:30:24
11	MR. BAZAREK: Object to the form of the	10:30:24
12	question, foundation, mischaracterizes the	10:30:25
13	evidence in the record in this case.	10:30:28
14	MR. MICHALIK: Join.	10:30:30
15	MR. SCHALKA: Join.	10:30:30
16	MR. KOSOKO: Join.	10:30:31
17	A Fifth Amendment.	10:30:31
18	Q Did you search William Carter on	10:30:33
19	March 3rd, 2004, at about 5:05 p.m.?	10:30:35
20	A Fifth Amendment.	10:30:38
21	Q Did you see any police officer search	10:30:39
22	William Carter on March 3rd, 2004, at about	10:30:40
23	5:05 p.m.?	10:30:45
24	A Fifth Amendment.	10:30:45

## Transcript of Kallatt Mohammed, Cont.

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1	Q Did you find clear plastic bags on William	10:30:46
2	Carter's person on March 3rd, 2004, at about	10:30:48
3	5:05 p.m.?	10:30:52
4	A Fifth Amendment.	10:30:52
5	Q Did you see any other police officer find	10:30:53
6	clear plastic bags on William Carter's person on	10:30:54
7	March 3rd, 2004, at about 5:05 p.m.?	10:30:57
8	A Fifth Amendment.	10:31:00
9	Q Is the statement in the report that police	10:31:00
10	officers found clear plastic bags on William	10:31:02
11	Carter's person on March 3rd, 2004, at about	10:31:04
12	5:05 p.m. a false statement?	10:31:09
13	MR. BAZAREK: Object to the form of the	10:31:10
14	question, foundation, mischaracterizes the	10:31:11
15	evidence in the record in this case.	10:31:14
16	MR. MICHALIK: Join.	10:31:15
17	MR. SCHALKA: Join.	10:31:15
18	MR. KOSOKO: Join.	10:31:16
19	A Fifth Amendment.	10:31:16
20	Q Is this report, Exhibit 26, about William	10:31:17
21	Carter's arrest on March 3rd, 2004, an accurate	10:31:20
22	report?	10:31:23
23	A Fifth Amendment.	10:31:23
24	Q Were you involved in framing William	10:31:24

## Transcript of Kallatt Mohammed, Cont.

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1	Carter on March 3rd, 2004?	10:31:26
2	MR. BAZAREK: Object to the form of the	10:31:27
3	question, foundation, mischaracterizes the	10:31:29
4	evidence in the record in this case.	10:31:32
5	MR. MICHALIK: Join.	10:31:34
6	MR. SCHALKA: Join.	10:31:34
7	MR. KOSOKO: Join.	10:31:34
8	A Fifth Amendment.	10:31:35
9	Q Did you use force against William Carter	10:31:36
10	on March 3rd, 2004?	10:31:38
11	A Fifth Amendment.	10:31:39
12	Q Did you see any police officer use force	10:31:40
13	against William Carter on March 3rd, 2004?	10:31:42
14	A Fifth Amendment.	10:31:45
15	Q Do you see that R. Watts is listed in Box	10:31:45
16	No. 48 as the supervisor approving on Exhibit 26?	10:32:07
17	A Yes.	10:32:13
18	Q And are you able to tell whether that's	10:32:14
19	Ronald Watts' signature underneath his name?	10:32:17
20	A No, I'm not.	10:32:19
21	MR. KOSOKO: Objection; foundation.	10:32:20
22	Q And on the second page of this report, do	10:32:23
23	you see a signature in the box that says	10:32:31
24	"Supervisor's Signature"?	10:32:33

## Transcript of Kallatt Mohammed, Cont.

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1	evidence in the record in this case.	10:46:19
2	MR. MICHALIK: Join.	10:46:21
3	MR. SCHALKA: Join.	10:46:21
4	MR. KOSOKO: Join.	10:46:21
5	A Fifth Amendment.	10:46:22
6	Q Did you ever hear that Officer Edwards	10:46:23
7	signed a police report that contained false	10:46:25
8	information about William Carter related to the	10:46:27
9	arrest on June 18th, 2004?	10:46:29
10	MR. BAZAREK: Object to the form of the	10:46:31
11	question, foundation, mischaracterizes the	10:46:32
12	evidence in the record in this case.	10:46:36
13	MR. MICHALIK: Join.	10:46:38
14	MR. SCHALKA: Join.	10:46:38
15	MR. KOSOKO: Join.	10:46:40
16	A Fifth Amendment.	10:46:40
17	Q Were you involved in arresting William	10:46:41
18	Carter on June 18th, 2004?	10:46:43
19	A Fifth Amendment.	10:46:45
20	Q Was Ronald Watts present for the arrest of	10:46:45
21	William Carter on June 18th, 2004?	10:46:48
22	MR. KOSOKO: Objection; foundation.	10:46:50
23	A Fifth Amendment.	10:46:52
24	Q When you worked at Ida B. Wells, did you	10:46:53

## Transcript of Kallatt Mohammed, Cont.

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1	Q	Were you involved in framing William	10:50:10
2		Carter on June 18th, 2004?	10:50:11
3	MR. BAZAREK:	Object to the form of the	10:50:13
4		question, foundation, mischaracterizes the	10:50:14
5		evidence in the record in this case.	10:50:17
6	MR. KOSOKO:	Join.	10:50:19
7	MR. MICHALIK:	Join.	10:50:20
8	A	Fifth Amendment.	10:50:21
9	Q	Did you observe Alvin Jones plant drugs on	10:50:21
10		William Carter on June 18th, 2004?	10:50:24
11	MR. BAZAREK:	Object to the form of the	10:50:26
12		question, foundation, mischaracterizes the	10:50:28
13		evidence in the record in this case.	10:50:29
14	MR. MICHALIK:	Join.	10:50:33
15	MR. KOSOKO:	Join.	10:50:34
16	A	Fifth Amendment.	10:50:35
17	Q	Did you use force against William Carter	10:50:36
18		on June 18th, 2004?	10:50:41
19	A	Fifth Amendment.	10:50:43
20	Q	Did you see any police officer use force	10:50:44
21		against William Carter on June 18th, 2004?	10:50:49
22	A	Fifth Amendment.	10:50:51
23	Q	Did you point a gun at William Carter on	10:50:52
24		June 18th, 2004?	10:50:54

## Transcript of Kallatt Mohammed, Cont.

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1	asked and answered.	11:00:39
2	MR. MICHALIK: Join.	11:00:42
3	MR. SCHALKA: Join.	11:00:42
4	MR. KOSOKO: Join.	11:00:42
5	A Fifth Amendment.	11:00:43
6	Q Were you involved in arresting William	11:00:44
7	Carter on May 19th, 2006?	11:00:45
8	A Fifth Amendment.	11:00:46
9	Q Was Ronald Watts present for the arrest of	11:00:47
10	William Carter on May 19th, 2006?	11:00:50
11	MR. KOSOKO: Objection; foundation.	11:00:52
12	A Fifth Amendment.	11:00:53
13	Q Were you conducting a narcotics	11:00:54
14	investigation at 527 East Browning on May 19th,	11:00:59
15	2006, at about 7:15 p.m.?	11:01:02
16	A Fifth Amendment.	11:01:05
17	Q Do you know what a narcotics	11:01:06
18	investigation is?	11:01:08
19	A Don't recall.	11:01:11
20	Q As a police officer, did you ever	11:01:12
21	participate in a narcotics investigation?	11:01:16
22	A Don't recall.	11:01:20
23	Q Do you know what narcotics are?	11:01:24
24	A Yes.	11:01:41

## Transcript of Kallatt Mohammed, Cont.

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1	A Take the Fifth.	11:07:47
2	MR. MICHALIK: Objection; asked and	11:07:49
3	answered.	11:07:50
4	Q Were you involved in framing William	11:07:51
5	Carter on May 19th, 2006?	11:07:52
6	MR. BAZAREK: Object to the form of the	11:07:54
7	question, foundation, mischaracterizes the	11:07:56
8	evidence in the record in this case.	11:07:57
9	MR. MICHALIK: Join.	11:08:00
10	MR. SCHALKA: Join.	11:08:00
11	MR. KOSOKO: Join.	11:08:00
12	A Take the Fifth.	11:08:00
13	Q Were you involved in framing Sandra Berry	11:08:03
14	on May 19th, 2006?	11:08:05
15	MR. BAZAREK: Object to the form of the	11:08:07
16	question, foundation, mischaracterizes the	11:08:08
17	evidence in the record in this case.	11:08:09
18	MR. MICHALIK: Join.	11:08:12
19	MR. SCHALKA: Join.	11:08:12
20	MR. KOSOKO: Join.	11:08:12
21	A Take the Fifth.	11:08:13
22	Q Did you see Alvin Jones plant drugs on	11:08:15
23	William Carter on May 19th, 2006?	11:08:17
24	MR. BAZAREK: Object to the form of the	11:08:19