

GROUP EXHIBIT 63



MASTER DOCKET CASE NO. 19-CV-01717
IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS

DEPONENT:
DARRYL EDWARDS

DATE:
October 28, 2021



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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION
MASTER DOCKET CASE NO. 19-CV-01717
JUDGE VALDERRAMA
MAGISTRATE JUDGE SHELIA M. FINNEGAN

IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS

DEONENT: DARRYL EDWARDS
DATE: OCTOBER 28, 2021
REPORTER: CHLOE HOWARD

1 Q **Could you carry a gun?**

2 A Yes.

3 Q **Did you attend the Chicago Police Academy?**

4 A Yes.

5 Q **And when did you attend the academy?**

6 A The first time in 1992, June. The second
7 time, October 4, 1999.

8 Q **And why did you attend twice?**

9 A When the Chicago Housing Authority Police
10 Department was disbanded, I had to go through the hiring
11 process to be a Chicago Police officer. And had to
12 attend the academy for the full process of the Chicago
13 Police Department's training.

14 Q **Did you grow up in the Chicago area?**

15 A Yes.

16 Q **Did you attend high school in the Chicago
17 area?**

18 A Yes.

19 Q **Where did you attend high school?**

20 A Dunbar Vocational High School.

21 Q **And when you joined the Chicago Housing
22 Authority Police Department, what was your assignment
23 there?**

24 A Policeman.

25 Q **And what did you do in that role? What were**



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Transcript of Alvin Jones

Date: February 26, 2020
Case: Watts Coordinated Cases

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Transcript of Alvin Jones
Conducted on February 26, 2020

1 (1 to 4)

1	IN THE UNITED STATES DISTRICT COURT FOR THE	1	A P P E A R A N C E S
2	NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION	2	ON BEHALF OF CERTAIN PLAINTIFFS:
3		3	SCOTT R. RAUSCHER, ESQUIRE
4	-----x	4	LOEVY & LOEVY
5	: Master Docket Case No.	5	311 North Aberdeen Street
6	: 19-cv-01717	6	Third Floor
7	In re: WATTS COORDINATED :	7	Chicago, Illinois 60607
8	PRETRIAL PROCEEDINGS : Judge Andrea R. Wood	8	(312) 243-5900
9	:	9	
10	: Magistrate Judge	10	ON BEHALF OF CERTAIN PLAINTIFFS:
11	: Sheila M. Finnegan	11	JOEL A. FLAXMAN, ESQUIRE
12	-----x	12	KENNETH N. FLAXMAN P.C.
13		13	200 South Michigan Avenue
14	VOLUME 1	14	Suite 201
15	Videotaped Deposition of SERGEANT ALVIN JONES	15	Chicago Illinois 60604
16	CHICAGO, ILLINOIS	16	(312) 427-3200
17	Wednesday, February 26, 2020	17	
18	10:12 a.m.	18	ON BEHALF OF DEFENDANTS, CADMAN and SPAARGAREN
19		19	MICHAEL SCHALKA, ESQUIRE
20		20	LEINENWEBER BARONI & DAFFADA LLC
21		21	120 North LaSalle Street
22	Job: 291160	22	Suite 2000
23	Pages: 1 - 325	23	Chicago, Illinois 60602
24	Transcribed by: Jerome E. Harris, CLDT-204	24	(866) 786-3705

2		4	
1	Videotaped Deposition of SERGEANT ALVIN JONES,	1	A P P E A R A N C E S C O N T I N U E D
2	held at the offices of:	2	ON BEHALF OF DEFENDANT, KALLATT MOHAMMED
3	LOEVY & LOEVY	3	GARY RAVITZ, ESQUIRE
4	311 N. Aberdeen Street	4	DALEY MOHAN GROBLE
5	3rd Floor	5	55 West Monroe
6	Chicago, IL 60607	6	Suite 1600
7	(312) 243-5900	7	Chicago, Illinois 60603
8		8	(312) 422-9999
9		9	
10		10	ON BEHALF OF THE DEFENDANT, RONALD WATTS:
11		11	AHMED A. KOSOKO, ESQUIRE
12		12	JOHNSON & BELL
13		13	33 West Monroe Street
14		14	Suite 2700
15	Pursuant to notice, before Ryan Grzelak, Notary	15	Chicago, Illinois 60603
16	Public in and for the State of Illinois.	16	(312) 984-0214
17		17	
18		18	ON BEHALF OF CITY OF CHICAGO and SUPERVISORY OFFICIALS
19		19	PAUL A. MICHALIK, ESQUIRE
20		20	REITER BURNS LLP
21		21	311 Wacker Drive
22		22	Suite 5200
23		23	Chicago Illinois 60606
24		24	(312) 878-1294

Transcript of Alvin Jones
Conducted on February 26, 2020

15 (57 to 60)

	57		59
1	A An accurate list? Yes, it's accurate.	1	A Yes, I was.
2	Q So you started in 1996; is that right?	2	Q What was your job with the Cook County
3	A Yes.	3	Sheriff's Office?
4	Q And you were -- you started in training?	4	A I was Cook County Sheriff correctional officer.
5	A Yes.	5	Q How long were you a Cook County Sheriff's
6	Q And then, you moved immediately after that to	6	correctional officer?
7	District 2?	7	A From approximately '94 to '96.
8	A Yes.	8	Q What did you do as a correctional officer for
9	Q Can you tell me anything else you -- we talked	9	Cook County?
10	10 some about you had some memory of a report writing	10	A Guarded inmates.
11	11 training?	11	Q Where did you guard inmates?
12	A Yes.	12	A On cell blocks.
13	Q Is that right?	13	Q Where?
14	A Yes.	14	Where? What was the location?
15	Q Would that be during the '96, '97 time period	15	A 26th and California.
16	16 listed here?	16	Q What did you do to guard inmates in cell blocks
17	A Yes.	17	17 at 26th and California?
18	Q What else do you remember getting trained on	18	A There's an interlock area where you sit and
19	19 during that time period?	19	observe inmates all day.
20	A I got trained on firearms, I got trained on	20	Q Did you like that job?
21	traffic stops, I got trained on how to wear uniforms,	21	A It was okay.
22	how to search.	22	Q Did you ever get accused of using excessive
23	Q What do you remember about training on how to	23	force in that job?
24	24 search?	24	A I don't remember.
	58		60
1	A Vaguely. You always try to make sure there's	1	Q Did you ever get disciplined or reprimanded in
2	nothing in a waistband. If nothing harms you, that's	2	any way at that job?
3	the first thing. Make sure their hands are clear in	3	A I don't remember.
4	their waistband where a weapon might could be stored.	4	Q You don't remember one way or the other?
5	Q Did you receive training on where searches	5	A I don't remember one way or the other.
6	should be conducted if you're arresting people?	6	Q Did you ever use excessive force in that job?
7	A I don't recall that.	7	A No.
8	Q Any other topics that you remember receiving	8	Q Did you ever do anything that would have
9	9 training on?	9	warranted discipline?
10	A I don't remember all the topics from the	10	A Not that I can remember.
11	academy.	11	Q What were your main responsibilities when you
12	Q Do you remember any other topics from the	12	12 worked as a correctional officer?
13	13 academy that you received training on?	13	A To observe inmates during the course of the
14	A No, not at this time.	14	tour to make sure that they were safe inside that --
15	Q All right. And what was your first assignment	15	15 that tier.
16	16 after the academy?	16	Q How did you accomplish your job of making sure
17	A The 2nd District.	17	17 inmates were safe inside the tier?
18	Q Did you ask to go to the second 2nd District?	18	A By sitting there and observing them for the
19	A No.	19	tour of duty.
20	Q Did you want to be in the 2nd District?	20	Q How did you sit and observe them?
21	A I didn't know where I wanted to be. I was just	21	A After you get there, you do a count, and they
22	assigned there.	22	-- and a count clear, the doors are open, they are
23	Q Before you came to the police station, were you	23	allowed time to come out. Those that want to come out
24	24 working for the Cook County Sheriff's Office?	24	come out. Those that don't, don't. After that, the



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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

369

1 A It's been -- it's been some time. 14:02:07

2 Q Do you remember when -- when you got 14:02:09

3 formal training about police report writing other 14:02:12

4 than at the academy? 14:02:14

5 A I don't remember. 14:02:15

6 Q And do you remember where you got that 14:02:17

7 formal training outside of the academy? 14:02:20

8 A I don't remember. 14:02:22

9 Q Do you remember any of your training -- 14:02:23

10 well, did you get trained on how to write police 14:02:26

11 reports while you were at the academy? 14:02:29

12 A Yes. 14:02:31

13 Q Can you tell me what you remember about 14:02:31

14 the training on how to write police reports that 14:02:33

15 you received while you were at the academy? 14:02:37

16 A Well, it's -- that's been over seven, 14:02:39

17 eight years. I don't remember. 14:02:41

18 Q It's probably been a lot longer than seven 14:02:44

19 or eight years; right? 14:02:47

20 A Probably. Yeah, I don't -- I don't 14:02:48

21 remember. 14:02:50

22 Q When were you at the academy? 14:02:50

23 A In -- '96. 1996. 14:02:52

24 Q Do you remember anything about your 14:02:56

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

370

1	training from the academy?	14:03:03
2	A No.	14:03:04
3	Can't remember, no.	14:03:07
4	MR. RAUSCHER: I'm going to mark	14:03:13
5	Exhibit 40.	14:03:14
6	(Mohammed Deposition Exhibit 40 marked for	14:03:21
7	identification and attached to the transcript.)	14:03:24
8	Q This is a report documenting the arrest of	14:03:24
9	Anthony McDaniels on November 21st, 2008?	14:04:02
10	A That's what it says, yes.	14:04:07
11	Q And you were involved in that arrest?	14:04:08
12	A Take the Fifth.	14:04:10
13	Q Have you had a chance to review the	14:04:12
14	narrative portion of here, the "Incident	14:04:19
15	Narrative"?	14:04:21
16	You had a chance to review that?	14:04:43
17	A Yes.	14:04:44
18	Q Which part of the narrative in this, if	14:04:45
19	any, is true?	14:04:47
20	MR. BAZAREK: Object to the form of the	14:04:48
21	question, foundation.	14:04:51
22	MR. MICHALIK: Join.	14:04:54
23	MR. SCHALKA: Join.	14:04:54
24	MR. KOSOKO: Join.	14:04:54



CASE NO.: 1:19-CV-01717

WATTS COORDINATED PRETRIAL PROCEEDINGS, ET AL.

V.

KALLAT MOHAMMED, ET AL.

DEPONENT:

CALVIN RIDGELL

DATE:

February 21, 2024



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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS - CM/ECF
NEXTGEN1.7.1.1
EASTERN DIVISION
HONORABLE FRANKLIN U. VALDERRAMA
HONORABLE SHEILA M. FINNEGAN
CASE NO.: 1:19-CV-01717

WATTS COORDINATED PRETRIAL PROCEEDINGS, ET AL.,

Plaintiffs

V.

KALLAT MOHAMMED, ET AL.,

Defendants

DEONENT: CALVIN RIDGELL
DATE: FEBRUARY 21, 2024
REPORTER: KORTNEY CHASE

Page 14

1 not going to be intending to ask you any questions about
 2 any conversations you've had with your attorneys or any
 3 therapist. So if I ask a question that seems to
 4 indicate that to you, that is a mistake. I'm sure we
 5 will have an objection. But I am not asking you to
 6 withhold or communicate any communications that you've
 7 had with either a therapist or an attorney. Do you
 8 understand that?

9 A. Yes.

10 Q. Okay. Are you generally aware that any
 11 plaintiff in the Watts coordinated proceedings who has
 12 named you as a defendant, that they're alleging -- and
 13 I'm not saying you have to agree, but they're alleging
 14 that you violated their Constitutional or state rights?

15 A. Can you repeat that again?

16 Q. Are you generally aware by -- there's a lot of
 17 plaintiffs in these Watts coordinated proceedings, that
 18 any plaintiff who has named you as a defendant, do you
 19 understand that they're alleging, and you don't have to
 20 agree, that you personally violated their state or
 21 Constitutional rights?

22 A. I know now, yeah.

23 Q. Okay. So you understand, then?

24 A. Yes.

25 Q. Okay. All right. Do you know who any of the

Page 16

1 A. I didn't know him before I came to --
 2 Q. All right. That's all I wanted to know. Okay.
 3 And when did you leave the team that -- where he was
 4 your sergeant?

5 A. In the summer of 2004.

6 Q. And have you had any contact with him since
 7 the summer of 2004 after you left the team?

8 A. Only in passing, when I had to do other work
 9 with the teams I was working with -- at the marshal's
 10 office.

11 Q. At the marshal's office.

12 A. Yes.

13 Q. So you had -- when you say, in passing, did
 14 you communicate with him?

15 A. I said hi to him when he was working in the
 16 station.

17 Q. Okay. Now, you're aware that Ronald Watts is
 18 no longer an active Chicago Police Department officer or
 19 sergeant, correct?

20 A. Yes.

21 Q. Have you had any contact with him since he no
 22 longer became a police?

23 A. No.

24 Q. Okay. Are you aware that an Officer Kallatt
 25 Mohammed is the defendant in many of these lawsuits?

Page 15

1 other defendants are in these coordinated proceedings?

2 A. Some. Are you asking me to name them?

3 Q. No. I'm going to go through them --

4 A. Okay.

5 Q. -- and I'm going to ask you some questions
 6 about them.

7 A. All right.

8 Q. Okay. Are you aware that Ronald Watts is a
 9 defendant in, I think, every one of these coordinated
 10 proceedings?

11 A. Yeah.

12 Q. Okay. Do you know Ronald Watts?

13 A. He was my sergeant.

14 Q. When was he your sergeant?

15 A. When I came on the team in late 2002, I think.

16 Q. Okay. Prior to late 2002, when you came on
 17 the team, did you know Sergeant Ronald Watts?

18 A. No.

19 Q. Did you know Ronald Watts period, whether or
 20 not he was a sergeant?

21 A. Know he was a sergeant?

22 Q. I'm sorry?

23 A. You said, know he was a sergeant?

24 Q. I apologize. I framed it as, did you know

25 Sergeant Ronald Watts? So I'm clarifying.

Page 17

1 A. Yes.

2 Q. Do you know Officer Kallatt Mohammed?

3 A. Yes, I do.

4 Q. Okay. When did you first meet Kallatt
 5 Mohammed?

6 A. When I was a rookie in -- in the Second
 7 District.

8 Q. Okay. When were you a rookie in the Second
 9 District?

10 A. In 1999.

11 Q. How did you come to meet Officer Mohammed as a
 12 rookie in the Second District?

13 A. He was on the watch I was working.

14 Q. What watch was that?

15 A. I want to say maybe third watch.

16 Q. Was he on your team or unit?

17 A. No. I was just a patrolman. I was a PPO,
 18 new, coming out the academy.

19 Q. Okay. So you were a new patrolman just coming
 20 out of the academy. And what position did he have, if
 21 you know?

22 A. I guess he was a police officer at the time.

23 Q. What's the difference between a police officer
 24 and a patrolman?

25 A. I was an at-will employee, a PPO, which is

Page 18

1 new, coming out the academy. That's the only thing I
 2 can tell you. I was a new recruit coming out.
 3 Q. Okay. So did you have the title as a police
 4 officer?
 5 A. I was a police officer.
 6 Q. Okay. Let me just finish the question. I'm
 7 not --
 8 A. He had more time than I had.
 9 Q. Okay.
 10 A. Maybe a decade.
 11 Q. Okay. So that's the distinction you're saying
 12 that you didn't know him as, like, a co-rookie, so to
 13 speak?
 14 A. No. No, I didn't know him. I -- I knew of
 15 him when I -- with other officers that was working there
 16 at the time.
 17 Q. Okay.
 18 A. Not on no team, just on the regular patrol.
 19 Q. Okay. But you had members of your team who
 20 also were not rookies, correct?
 21 A. On my team? I didn't have a team.
 22 Q. Oh. I see.
 23 A. I was -- I was a PPO. Just a patrolman. No
 24 team, nothing.
 25 Q. I see. Okay. Do you recall, were you friends

Page 20

1 THE WITNESS: My fault.
 2 BY MR. TEPFER:
 3 Q. You're doing great. I got it. My questions
 4 are not complicated or nuanced, but just let me finish.
 5 MR. ZECCHIN: And Josh, you need to speak up a
 6 bit.
 7 MR. TEPFER: I'm sorry. I want -- let me try
 8 to put on my volume a little bit louder. Is that
 9 better? I'm talking about the same.
 10 MR. ZECCHIN: Yeah. No, that sounds better to
 11 me.
 12 MR. TEPFER: Okay. I apologize.
 13 BY MR. TEPFER:
 14 Q. Okay. So you're -- I think my question was:
 15 You're aware that Officer Mohammed is no longer a
 16 Chicago police officer, correct?
 17 A. Correct.
 18 Q. Okay. Do you recall if you've spoken to him
 19 since he left the CPD?
 20 A. No, I don't.
 21 Q. You have not?
 22 A. No, I don't remember.
 23 Q. Okay. All right. Now, there was other times
 24 in your career that you -- is there other times in your
 25 career that you worked with Officer Mohammed, besides as

Page 19

1 with Officer Mohammed at that time?
 2 A. Didn't know him well enough to be friends with
 3 no one.
 4 Q. Well, how would you describe the nature of
 5 your relationship when you were a rookie in the Second
 6 District and you met Officer Mohammed?
 7 A. They -- coworkers.
 8 Q. Coworkers. Okay. You didn't hang out outside
 9 of work?
 10 A. No.
 11 Q. When is the last time you've spoken to Officer
 12 Mohammed?
 13 A. I can't even remember when the last time I
 14 talked to him.
 15 Q. You're aware that Officer Mohammed is no
 16 longer in active duty as a police officer?
 17 A. Yes.
 18 Q. And I'm just going to stop you one more second
 19 just to try to remind you. I know you probably already
 20 know the questions I'm going to ask, but just -- if you
 21 could try to let me finish the question, it's going to
 22 make it a lot easier on her.
 23 A. Oh, okay. I got you. All right.
 24 MR. FLAXMAN: I was about to jump in and say
 25 the same.

Page 21

1 a rookie in the Second District?
 2 A. Yes.
 3 Q. Okay. And when was that?
 4 A. When I was on that -- the TAC team.
 5 Q. Okay.
 6 A. The housing TAC team.
 7 Q. Okay. And what housing TAC team was that?
 8 A. Housing South.
 9 Q. Okay. And when were you on Housing South?
 10 A. The late 2002 to 2004.
 11 Q. Okay. Do you know when you -- is that when
 12 you said in the summer of 2004 is when you stopped?
 13 A. That's when I stopped.
 14 Q. Okay. So you worked with Officer Mohammed
 15 during the same time when Ronald Watts was your sergeant
 16 at Public Housing South, correct?
 17 A. Correct.
 18 Q. Okay. Is there any other time in your career
 19 that you worked with Officer Mohammed?
 20 A. No.
 21 Q. Okay. Between, you said you worked with him
 22 at the Second District as a rookie in 1999 or -- I'm
 23 sorry, you both worked in the Second District --
 24 A. 1999.
 25 Q. Okay. From 1999 to 2002 was -- did you work -



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Transcript of Elsworth Smith, Jr.

Date: February 17, 2020
Case: Watts Coordinated Cases

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1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF ILLINOIS

3 EASTERN DIVISION

4

5 - - - - - x

6 WATTS COORDINATED CASES. : Master Docket

7 : Case No. 19-cv-01717

8 - - - - - x

9

10

11

12 Videotaped Deposition of

13 ELSWORTH SMITH, JR., Volume I

14 Chicago, Illinois

15 Monday, February 17, 2020

16 10:09 a.m.

17

18

19

20

21

22 Job No.: 281824

23 Pages: 1 - 314

24 Reported by: Joanne E. Ely, CSR, RPR

Transcript of Elsworth Smith, Jr.

Conducted on February 17, 2020

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1 what I've observed or what I've heard on -- I'm 12:36:56
2 sorry -- what I've heard through the media. 12:36:59
3 Q Do you think the code of silence allowed 12:37:01
4 Ronald Watts and Kallatt Mohammed to go unchecked? 12:37:05
5 MR. STEFANICH: Objection -- 12:37:08
6 MR. MICHALIK: Objection. 12:37:09
7 MR. STEFANICH: -- form and foundation. 12:37:10
8 You can answer. 12:37:11
9 A I have no idea. 12:37:12
10 Q Before you became a patrol officer, did 12:37:28
11 you receive any training on how to write police 12:37:32
12 reports? 12:37:34
13 A Yes, I did. 12:37:34
14 Q Tell me about the training that you 12:37:34
15 received on how to be -- how to write police 12:37:36
16 reports? 12:37:38
17 A Any training that I've had about writing 12:37:38
18 reports would have been while I was in the police 12:37:43
19 academy, which was 20 years ago. And as I sit 12:37:46
20 here today, I don't remember the specific training 12:37:49
21 that I received from any classes in the police 12:37:53
22 academy. 12:37:57
23 Q Did you take any written tests on your 12:37:57
24 training while you were at the academy? 12:38:04

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF
3 ILLINOIS EASTERN DIVISION

5 In re: WATTS COORDINATED : Master Docket
6 PRETRIAL PROCEEDINGS : Case No. 19-cv-01717

9 | **CONTAINS INFORMATION DESIGNATED**

10 | ATTORNEYS' EYES ONLY

11 Deposition of Jerome Summers Jr., Volume 1

12 Chicago, Illinois

13 Tuesday, February 11, 2020

14 10:10 a.m.

15

22 Job No. 274039

23 | Pages: 1-240

24 Transcribed by: Megan Wunsch, AAERT CET

CONTAINS ATTORNEYS' EYES ONLY INFORMATION

Transcript of Gerome Summers Jr.

February 11, 2020

2

1 Deposition of Gerome Summers Jr., held at the
2 offices of:

3 Loevy & Loevy

4 311 North Aberdeen Street, 3rd Floor

5 Chicago, Illinois 60607

6 (312) 243-5900

7

8 Pursuant to agreement, before Ryan Grzelak,

9 Notary Public in and for the State of Illinois.

10

11

12

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19

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22

23

24

CONTAINS ATTORNEYS' EYES ONLY INFORMATION

Transcript of Gerome Summers Jr.

February 11, 2020

12

1 officer?

2 A Twenty-one years.

3 Q How many times do you think you've
4 testified over the years as a Chicago police
5 officer?

6 A Definitely well over 35, 40 times.

7 Q How many of those times when you testified
8 were in criminal proceedings?

9 A They -- they all was at criminal
10 proceedings.

11 Q Have you ever testified in a civil case
12 other than the deposition you just mentioned?

13 A No.

14 Q Can you give me an overview of your roles
15 at the CPD over the years.

16 A Sure. When I came on the job out of the
17 academy, I was -- it was in patrol in the 2nd
18 District, in uniform. From there, I went to the
19 Chicago housing unit where I was on the gang teams
20 in a plainclothes capacity. From housing, I went
21 to the 12th District, where -- that's back in
22 patrol again, in uniform, and like I said before,
23 I was on the wagon. And now I am in the Public
24 Transportation Unit and under the -- I believe

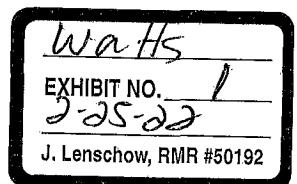
IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

)
)
)
)
)
In re WATTS CONSOLIDATED) Master Docket No 19 CV 1717
) Judge Andrea R Wood
) Magistrate Judge Sheila M Finnegan
)

**DEFENDANT RONALD WATTS' ANSWERS TO PLAINTIFF SHAUN JAMES FIRST
SET OF INTERROGATORIES TO INDIVIDUAL DEFENDANT RONALD WATTS**

Defendant, Ronald Watts, by and through his attorneys, Johnson & Bell, Ltd , and for his
Answers to Plaintiff's First Set of Interrogatories to Defendant Watts, herein states as follows

- 1 Defendant objects to these interrogatories to the extent that they seek information that is not reasonably calculated to lead to the discovery of admissible evidence
- 2 Defendant objects to these interrogatories as improper and unduly burdensome to the extent that they purport to impose upon Defendant any obligations or requirements broader than those set forth in the Federal Rules of Civil Procedure or rules otherwise applicable to this matter
- 3 Defendant objects to these interrogatories to the extent they call for information that is a matter of public record or otherwise routinely available to all parties
- 4 Defendant objects to these requests to the extent they are duplicative or designed to harass or to reintroduce evidence ordered stricken from the record
- 5 Defendant reserve the right to modify, amend, or supplement any answers or objections contained herein in light of information developed or learned at a later date through Defendants' continuing investigation and/or discovery
- 6 Defendant does not concede that any of their responses to these interrogatories are or will be admissible evidence at a trial of this action Defendant does not waive any objection, on any ground, whether or not asserted herein, to the use of any such response at trial



2 Under oath, please identify every Communication that you have had about any of the allegations, events, or circumstances described in each Plaintiffs' Complaint with any Person, including but not limited to each Plaintiff and any of the other Individual Defendants, any other employee or agent of the City of Chicago, any other prosecutor or law enforcement authority, or any witness to the events described in Plaintiffs' Complaints For each such Communication, please (a) state with particularity the substance of the Communication, (b) identify everyone involved in the Communication, (c) provide the date of the Communication, and (d) state whether or not the Communication was memorialized in a police report or other Document If you answer this Interrogatory by referring to Documents, please state under oath that the sum total of Communications responsive to this Interrogatory are contained in the Documents that you reference

ANSWER: Defendant objects to this interrogatory on the basis that it is vague, not limited to in time or scope, unduly burdensome, and overly broad. Defendant further objects to this interrogatory on the basis that it seeks information protected by the attorney client and attorney work product privileges.

3 Please identify with specificity all of your assignments and/or details during your employment with the Chicago Police Department, specifically identifying the time in which you were a member of team that patrolled/responded to/ investigated/surveilled/or had any responsibilities related in any way to the Ida B Wells public housing development For each, please include the time period(s) during which you were assigned and/or detailed, specific responsibilities for each assignment and/or detail, list your direct supervisors up the chain of command for each

assignment and/or detail, and list all subordinates under your command for each assignment and/or detail

ANSWER: Defendant objects to this interrogatory as being overly broad, unduly burdensome, and calling for a narrative answer that is better suited for a discovery deposition. Notwithstanding and without waiving these objections, Defendant Watts was hired by the Chicago Police Department in January of 1994. Following his attendance at the police academy he was assigned to the Seventh District as a patrolman in June of 1994. In the early part of 1995, Defendant Watts was transferred to the Second District where he remained until he was named Sergeant in May of 2000. He worked in the Fifteenth District as a Patrol Sergeant for approximately a year before being transferred to Public Housing South in 2001. Defendant Watts became a Tactical Sergeant in Public Housing South in 2003. When the Public Housing South unit was dissolved in approximately 2005, Defendant Watts became a Tactical Sergeant in the Second District where he remained until he retired.

4 Answering separately for each Plaintiff, do you contend that each Plaintiff was guilty of the underlying crime or crimes for which they allege in their civil complaints that they were wrongfully convicted? If so, please provide the complete factual basis for your contention

ANSWER: Defendant objects to this Interrogatory because it calls for a legal conclusion. Notwithstanding and without waiving this objection, see the transcripts of Plaintiff's criminal trial and plea hearings believed to be in the possession of the Cook County State's Attorney's Office.

5 For each Plaintiff, please answer the following Did you participate in the arrest of Plaintiff? If your answer to this question is anything other than an unqualified "no," please describe



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Transcript of Kenneth Young, Jr.

Date: January 7, 2020
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
KENNETH YOUNG, JR., Volume I
Chicago, Illinois
Tuesday, January 7, 2020

Job No.: 273009
Pages: 1 - 326
Reported by: Melanie L. Humphrey-Sonntag,
CSR, RDR, CRR, CRC, FAPR

Transcript of Kenneth Young, Jr.

Conducted on January 7, 2020

52

1 Q Do you have any other memories of -- while 10:46:45
2 you were at Stateway Gardens -- of police officers 10:46:55
3 treating citizens in a way that made you 10:46:59
4 uncomfortable? 10:47:01

5 A No. 10:47:02

6 Q Just the one? 10:47:02

7 A Just that one. 10:47:03

8 Q Did you ever witness any police officer 10:47:04
9 use excessive force in Stateway Gardens? 10:47:06

10 A No. 10:47:08

11 Q Okay. 10:47:09

12 All right. How long have you been a 10:47:16
13 police officer? 10:47:18

14 A 28 years plus. 10:47:18

15 Q So when did you graduate from the academy? 10:47:24

16 A November '91. 10:47:26

17 Q What's your highest level of education? 10:47:28

18 A No degree but two years of college. 10:47:33

19 Q Where did you graduate from high school? 10:47:39

20 A Dunbar Vocational High School. 10:47:43

21 Q Where did you do your two years of 10:47:46
22 college? 10:47:48

23 A Hampton University. 10:47:48

24 Q Where's that? 10:47:50