

GROUP EXHIBIT 63



KENTUCKIANA
— COURT REPORTERS —

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

DEPONENT:
DARRYL EDWARDS

DATE:
October 28, 2021



✉ schedule@kentuckianareporters.com

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

7
8 IN RE: WATTS COORDINATED
9 PRETRIAL PROCEEDINGS
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23 DEPONENT: DARRYL EDWARDS
24 DATE: OCTOBER 28, 2021
25 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	3
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)

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



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

- - - - - x

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

- - - - - x

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



KENTUCKIANA
— COURT REPORTERS —

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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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS - CM/ECF
3 NEXTGEN1.7.1.1
4 EASTERN DIVISION

5 HONORABLE FRANKLIN U. VALDERRAMA

6 HONORABLE SHEILA M. FINNEGAN

7 CASE NO.: 1:19-CV-01717
8

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

12 V.
13

14 KALLAT MOHAMMED, ET AL.,
15 Defendants
16
17
18
19
20
21
22

23 DEPONENT: CALVIN RIDGELL

24 DATE: FEBRUARY 21, 2024

25 REPORTER: KORTNEY CHASE

<p style="text-align: right;">Page 14</p> <p>1 not going to be intending to ask you any questions about</p> <p>2 any conversations you've had with your attorneys or any</p> <p>3 therapist. So if I ask a question that seems to</p> <p>4 indicate that to you, that is a mistake. I'm sure we</p> <p>5 will have an objection. But I am not asking you to</p> <p>6 withhold or communicate any communications that you've</p> <p>7 had with either a therapist or an attorney. Do you</p> <p>8 understand that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Are you generally aware that any</p> <p>11 plaintiff in the Watts coordinated proceedings who has</p> <p>12 named you as a defendant, that they're alleging -- and</p> <p>13 I'm not saying you have to agree, but they're alleging</p> <p>14 that you violated their Constitutional or state rights?</p> <p>15 A. Can you repeat that again?</p> <p>16 Q. Are you generally aware by -- there's a lot of</p> <p>17 plaintiffs in these Watts coordinated proceedings, that</p> <p>18 any plaintiff who has named you as a defendant, do you</p> <p>19 understand that they're alleging, and you don't have to</p> <p>20 agree, that you personally violated their state or</p> <p>21 Constitutional rights?</p> <p>22 A. I know now, yeah.</p> <p>23 Q. Okay. So you understand, then?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. All right. Do you know who any of the</p>	<p style="text-align: right;">Page 16</p> <p>1 A. I didn't know him before I came to --</p> <p>2 Q. All right. That's all I wanted to know. Okay.</p> <p>3 And when did you leave the team that -- where he was</p> <p>4 your sergeant?</p> <p>5 A. In the summer of 2004.</p> <p>6 Q. And have you had any contact with him since</p> <p>7 the summer of 2004 after you left the team?</p> <p>8 A. Only in passing, when I had to do other work</p> <p>9 with the teams I was working with -- at the marshal's</p> <p>10 office.</p> <p>11 Q. At the marshal's office.</p> <p>12 A. Yes.</p> <p>13 Q. So you had -- when you say, in passing, did</p> <p>14 you communicate with him?</p> <p>15 A. I said hi to him when he was working in the</p> <p>16 station.</p> <p>17 Q. Okay. Now, you're aware that Ronald Watts is</p> <p>18 no longer an active Chicago Police Department officer or</p> <p>19 sergeant, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Have you had any contact with him since he no</p> <p>22 longer became a police?</p> <p>23 A. No.</p> <p>24 Q. Okay. Are you aware that an Officer Kallatt</p> <p>25 Mohammed is the defendant in many of these lawsuits?</p>
<p style="text-align: right;">Page 15</p> <p>1 other defendants are in these coordinated proceedings?</p> <p>2 A. Some. Are you asking me to name them?</p> <p>3 Q. No. I'm going to go through them --</p> <p>4 A. Okay.</p> <p>5 Q. -- and I'm going to ask you some questions</p> <p>6 about them.</p> <p>7 A. All right.</p> <p>8 Q. Okay. Are you aware that Ronald Watts is a</p> <p>9 defendant in, I think, every one of these coordinated</p> <p>10 proceedings?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. Do you know Ronald Watts?</p> <p>13 A. He was my sergeant.</p> <p>14 Q. When was he your sergeant?</p> <p>15 A. When I came on the team in late 2002, I think.</p> <p>16 Q. Okay. Prior to late 2002, when you came on</p> <p>17 the team, did you know Sergeant Ronald Watts?</p> <p>18 A. No.</p> <p>19 Q. Did you know Ronald Watts period, whether or</p> <p>20 not he was a sergeant?</p> <p>21 A. Know he was a sergeant?</p> <p>22 Q. I'm sorry?</p> <p>23 A. You said, know he was a sergeant?</p> <p>24 Q. I apologize. I framed it as, did you know</p> <p>25 Sergeant Ronald Watts? So I'm clarifying.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. Yes.</p> <p>2 Q. Do you know Officer Kallatt Mohammed?</p> <p>3 A. Yes, I do.</p> <p>4 Q. Okay. When did you first meet Kallatt</p> <p>5 Mohammed?</p> <p>6 A. When I was a rookie in -- in the Second</p> <p>7 District.</p> <p>8 Q. Okay. When were you a rookie in the Second</p> <p>9 District?</p> <p>10 A. In 1999.</p> <p>11 Q. How did you come to meet Officer Mohammed as a</p> <p>12 rookie in the Second District?</p> <p>13 A. He was on the watch I was working.</p> <p>14 Q. What watch was that?</p> <p>15 A. I want to say maybe third watch.</p> <p>16 Q. Was he on your team or unit?</p> <p>17 A. No. I was just a patrolman. I was a PPO,</p> <p>18 new, coming out the academy.</p> <p>19 Q. Okay. So you were a new patrolman just coming</p> <p>20 out of the academy. And what position did he have, if</p> <p>21 you know?</p> <p>22 A. I guess he was a police officer at the time.</p> <p>23 Q. What's the difference between a police officer</p> <p>24 and a patrolman?</p> <p>25 A. I was an at-will employee, a PPO, which is</p>

<p style="text-align: right;">Page 18</p> <p>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</p>	<p style="text-align: right;">Page 20</p> <p>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</p>
<p style="text-align: right;">Page 19</p> <p>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.</p>	<p style="text-align: right;">Page 21</p> <p>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 -</p>



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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

142

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

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

-----x

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

-----x

CONTAINS INFORMATION DESIGNATED
ATTORNEYS' EYES ONLY

Deposition of Gerome Summers Jr., Volume 1

Chicago, Illinois

Tuesday, February 11, 2020

10:10 a.m.

Job No. 274039

Pages: 1-240

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
4 Loevy & Loevy

5 311 North Aberdeen Street, 3rd Floor

6 Chicago, Illinois 60607

7 (312) 243-5900
8

9 Pursuant to agreement, before Ryan Grzelak,
10 Notary Public in and for the State of Illinois.
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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

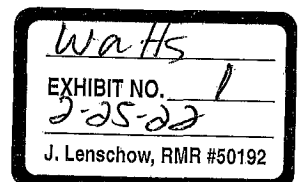
In re WATTS CONSOLIDATED

)
)
)
)
) 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

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

Videotaped Deposition of
KENNETH YOUNG, JR., Volume I
Chicago, Illinois
Tuesday, January 7, 2020
10:07 a.m.

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