

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

LIONEL WHITE,	)	
	)	
Plaintiff,	)	Honorable Sharon Johnson Coleman
	)	Magistrate Judge Sheila Finnegan
v.	)	
	)	Case No.: 17-cv-02877
CITY OF CHICAGO, RONALD WATTS,	)	
PHILLIP CLINE, DEBRA KIRBY, ALVIN	)	JURY DEMANDED
JONES, ELSWORTH SMITH, JR., KALLATT	)	
MOHAMMED, MANUEL LEANO, BRIAN	)	
BOLTON, ROBERT GONZALEZ, AND	)	
DOUGLAS NICHOLS,	)	
	)	
Defendants.	)	

**DEFENDANT RONALD WATTS' 26(A)(1) DISCLOSURES**

Defendant, Ronald Watts, by and through his attorneys, Johnson & Bell, Ltd., for his initial Rule 26(a)(1) Discovery Disclosures, states as follows:

**RULE 26(a)(1)(A)(i):** The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

**RESPONSE:**

1. Lionel White: Plaintiff. May be contacted via his counsel at Loevy & Loevy and the Law Offices of Kenneth N. Flaxman. Has knowledge regarding the events alleged in his complaint and pertaining to his April 24, 2006 arrest.
2. Kimberly Collins: May have knowledge regarding the events alleged in plaintiff's complaint and pertaining to plaintiff's April 24, 2006 arrest. Location unknown.
3. Rasaan Brakes: May have knowledge regarding the events alleged in plaintiff's complaint and pertaining to plaintiff's April 24, 2006 arrest. Location unknown.
4. Rasheed Brakes: May have knowledge regarding the events alleged in plaintiff's complaint and pertaining to plaintiff's April 24, 2006 arrest. Location unknown.
5. Derek Clay: May have knowledge regarding the events alleged in plaintiff's complaint and pertaining to plaintiff's April 24, 2006 arrest. Location unknown.

6. Vicki Ollie: May have knowledge regarding the events alleged in plaintiff's complaint and pertaining to plaintiff's April 24, 2006 arrest. Location unknown.
7. Ronald Watts: Defendant. May be contacted via his counsel at Johnson and Bell, Ltd. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
8. Officer Douglas Nichols: Defendant. May be contacted via his counsel at Hale Law, LLC. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
9. Officer Manuel Leano: Defendant. May be contacted via his counsel at Hale Law, LLC. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
10. Officer Brian Bolton: Defendant. May be contacted via his counsel at Hale Law, LLC. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
11. Officer Robert Gonzalez: Defendant. May be contacted via his counsel at Hale Law, LLC. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
12. Officer Alvin Jones: Defendant. May be contacted via his counsel at Hale Law, LLC. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
13. Debra Kirby: Defendant. May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
14. Philip Cline: Defendant. May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
15. Officer Arthur Carr Jr.: May be contacted via counsel for the City of Chicago. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
16. Officer Edward Griffin: May be contacted via counsel at Hale Law, LLC. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
17. Officer Abraham Aich: May be contacted via counsel for the City of Chicago. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
18. Officer Fulton Knight: May be contacted via counsel for the City of Chicago. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
19. Officer R. Brenza: May be contacted via counsel for the City of Chicago. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.
20. Officer T. Williams: May be contacted via counsel for the City of Chicago. Has knowledge regarding the facts and circumstances alleged in plaintiff's complaint, including but not limited to his role in plaintiff's April 24, 2006 arrest.

21. Calvin Holliday: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
22. Thomas Chester: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
23. Ray Broderdorf: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
24. Joel Howard: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
25. Joe Barnes: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
26. Allen Boehmer: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
27. Keith Calloway: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
28. Tim Moore: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
29. Kenneth Biggs: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
30. Juan Rivera: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
31. Tina Skahill: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
32. Robert Klimas: May be contacted via counsel for the City of Chicago. May have knowledge regarding investigations made by the Internal Affairs Division of the Chicago Police Department of Ronald Watts and Kallat Mohammed.
33. Wilbert Neal: May be contacted via counsel for the City of Chicago. May have knowledge regarding the events alleged in plaintiff's complaint and pertaining to plaintiff's April 24, 2006 arrest.
34. Deputy Chief John Risley: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
35. Lt. Elias Voulgaris: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.

36. Lt. Robert Cervenka: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
37. Sergeant Tony Di Cristofano: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
38. Officer Alice Del Raso: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
39. Officer Dave Hindman: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
40. Officer Dan Allen: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
41. Officer John Rytina: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
42. Officer Tony Green: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
43. Officer Dennis Hurd: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
44. Officer Oscar Brown: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
45. Officer Sterling Terry: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
46. Officer Phil Hernandez: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, and gang activity gang violence in the Ida B. Wells Housing Development.
47. Officer Dave Hernandez: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
48. Officer Joseph Martorano: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
49. Officer James Clarke: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, and gang violence in the Ida B. Wells Housing Development.

50. Officer Angela McGee: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
51. Deputy Chief John Killackey: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
52. Sgt. Martin Gainer: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
53. Officer Steven Dziak : May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
54. Nick Spanos: May be contacted via counsel for the City of Chicago. May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
55. Eric Phillipson: May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity and gang violence in the Ida B. Wells Housing Development.
56. John Ambrose: May have knowledge including but not limited to organized narcotics trafficking, narcotics sales, gun use, gang activity, and gang violence in the Ida B. Wells Housing Development.
57. Kelly Freeman: May have knowledge regarding activity occurring within the Ida B. Wells Housing development at or near the time of the allegations contained in plaintiff's complaint, including but not limited to narcotics sales, narcotics trafficking, gang activity, and gang violence

Investigation continues.

**RULE 26(a)(1)(A)(ii):** A copy of—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

**RESPONSE:** Defendant Ronald Watts, may rely on the documents, ESI, or tangible things produced by the City of Chicago and other parties, including third parties, in support of his defense in this case. Further, Defendant Watts may rely on any and all documents produced by any other party in this matter. Defendant Watts reserves the right to supplement this disclosure as additional documents become available. Investigation continues.

**RULE 26(a)(1)(A)(iii):** A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

**RESPONSE:** N/A

**RULE 26(a)(1)(A)(iv):** For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**RESPONSE:** At the time of the allegation contained in Plaintiff's Complaint, Defendant Watts was an employee of the City of Chicago. The City of Chicago is primarily self-insured. See the City of Chicago's Rule 26 Disclosures for additional information relevant to this disclosure.

**JOHNSON & BELL, LTD.**

By: /s/ Kevin A. Pacini  
One of the attorneys for Defendant Watts

Brian P. Gainer  
Monica Gutowski  
Kevin A. Pacini  
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**CERTIFICATE OF SERVICE**

I, Kevin A. Pacini, an attorney, hereby certify that on March 2, 2018, I served a copy of the foregoing, Defendant Watts's Rule 26 (A)(1) Disclosures, to all counsel of record via email.

Dated: March 2, 2018

/s/ Kevin A. Pacini