

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-CRIMINAL DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,
Respondent,

v.

LEONARD GIPSON,
Defendant-Petitioner.

AFFIDAVIT OF LEONARD GIPSON

I, Leonard Gipson, being first duly sworn and under penalties of perjury, swear and state as follows:

1. In January of 2003, Sergeant Ronald Watts, and the officers that worked under his direction, were well known to me. Indeed, everyone in the area knew them well. It was common knowledge that they were crooked police officers. I had heard they had stolen money and planted drugs on other individuals in the Ida B. Wells Housing in the past.
2. Prior to January 2003, Watts had approached me. He had specifically told me that if I paid him or got him guns, that I could work for free. What he meant by that was that he would let me sell drugs. I told him I was not interested in being part of whatever he was running. He told me that if I was not going to pay him that I would go to jail every time he ran into me.
3. Unfortunately, I became very well-acquainted with just how crooked Watts and his team were when they wrongfully arrested me on several occasions between 2003 and 2007.
4. My first encounter with Watts took place on January 4, 2003. At approximately 6:30 AM on that day, I left the Ida B. Wells projects in my car to go pick my kids up in order to take them to school. I was headed towards 35th and King Drive. Officer Alvin Jones, who I knew as "Al," and Watts pulled me over. They did not ask me any questions, but instead told me to get out of the car. They got me out of my car and put handcuffs on me immediately. They put me right into the backseat of their unmarked car. Once they got in the car, they told me at that they had already told me that if they saw me again they would "put something on" me.
5. They then took me back to 527 E. Browning and took me into the lobby of the building. Officers Mohammed, Gonzalez, Leano (who we called "Mini"), and several other officers were already in the lobby when we got there. Watts asked me "How much

money do you have to pay me?" I told him that I did not have any money. I also did not have any drugs or anything illegal on me.

6. Watts and Al then went around the corner and through the stairwell doorway. Mohammed, Mini, and Gonzalez stayed and watched me. Watts and Al were gone for approximately five to ten minutes. When they returned, Watts pulled a bag of drugs out of his pocket. He then said "These are yours" to me. They then arrested me and put me back in their car and took me to 51st and Wentworth.
7. I got charged with possessing heroin. I bonded out the next day.
8. I called the Office of Professional Standards (OPS) and spoke to an investigator over the phone to file my complaint. I told the investigator that Watts had arrested me and planted drugs on me. I told the investigator that Watts had threatened me and told me that if he saw me again he would plant drugs on me again. I was never contacted by anyone with OPS after I filed the complaint with OPS.
9. Prior to the date of signing this Affidavit, I have never seen my OPS complaint against Watts. I have reviewed Exhibit A to this Affidavit. This complaint states that the date of the incident in question was January 12, 2003. That is not correct. I told the investigator I spoke to on the phone that the date of the incident with Watts framing me was January 4, 2003. Further, despite what Exhibit A says, I specifically told the OPS investigator over the phone that Watts arrested me after planting drugs on me, and that he told me that if he saw me again, he would plant drugs on me again.
10. While awaiting trial on the charges relating to the January 4, 2003 arrest, I encountered Watts again.
11. My next encounter with Watts happened on May 8, 2003. I was outside the apartments located at 575 E. Browning where my girlfriend Nicole Parker lived. Watts and several other plainclothes officers approached me. Al, and Officers Mohammed, Summers, Cadman, Edwards, Gonzalez, and possibly other officers, were all there. Watts said to me "Let me see if you can bond off of this." I did not have any drugs or anything illegal on me. He handcuffed me, arrested me, and put me in his car and took me to 51st and Wentworth.
12. Again, I got charged with heroin. This time the bond was too high for me to bond out. I was sent to County.
13. During both the January and May 2003 arrests, I did not say anything or try to argue with Watts because I knew how Watts operated and that opening my mouth would only make things worse for me.
14. I fought both cases for two years while I was being held in County. I hired a lawyer named Dennis Cooley. I told my lawyer that Watts had framed me.

15. After two years, my lawyer got me a deal where both charges could run concurrently and I was offered boot camp. I took the deal because I knew that it was the best deal that I was going to get. I knew Watts was corrupt and that I was not going to win against corrupt cops.
16. After four months of boot camp, I got out on February 25, 2005. After getting out, I laid low and tried my best to avoid Watts and his crew.
17. My current wife (Nicole Parker), who was my girlfriend at the time, lived at 527 E. Browning. She became pregnant in 2007. She lived on the first floor of the building. On August 28, 2007, when I was leaving her house, Watts and his team were in the lobby of the building. Watts saw me and told me to come over to him. He asked me, "Do you have something for me?" I said, "No." I left the building. When I was walking to my car, one of Watts' team members called me back to the building. When I got back, multiple officers, including a female Officer I knew Coco, circled around me. Watts approached me and pulled a bag of drugs out his pocket. He said, "These are your drugs, hardass." He handcuffed me, arrested me, and took me to 51st and Wentworth.
18. I could not believe that this was happening again. I did not have any drugs or anything illegal on me. I had managed to avoid Watts for two plus years and now he had caught up to me again.
19. Once again, Watts charged me with possession of heroin, and this time he included a charge of possession of cocaine.
20. Once again, I hired Dennis Cooley as my lawyer. I again told Cooley that Watts had framed me. He recommended that I take a plea. I took a plea of four years because I realized once again that I was not going beat Watts.
21. I didn't file OPS complaint May 2003 or August 2007 false arrests because OPS didn't do anything about my first complaint. I never heard from them so I saw no reason to contact them.
22. As recently as 2016, I had another encounter with members of Watts' crew. Gonzalez and Mini approached me in their unmarked car when I was sitting in my parked car near 37th and Vincennes. Gonzalez asked me, "What are you doing sitting here?" I got out of the car and walked away because I was fearful that they would plant drugs on me and arrest me just as Watts had done numerous times before. As I was walking away, I took a picture of Gonzalez's car parked right next to mine. Exhibit B to this affidavit is that photo. The properly parked gray Grand Prix is my car in the photo and the dark Bluish Ford SUV is Gonzalez's car.

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that the facts set forth in this instrument are true and correct, except as to matters stated to be on information and belief and as to such matters the undersigned certifies that he believes the same to be true.


Leonard Gipson

Subscribed and sworn to me,

On this day 27th day of April, 2017





**SUMMARY REPORT DIGEST-
COMPLAINT REGISTER INVESTIGATION NO.:
CHICAGO POLICE DEPARTMENT**

287000

DATE OF REPORT (DAY-MO.-YEAR)

17 Feb 03

To be used in all cases that are to be classified as either EXONERATED, UNFOUNDED, NOT SUSTAINED, or in SUSTAINED cases where the Disciplinary Recommendation does not exceed FIVE (5) DAYS SUSPENSION.

SUBMIT ORIGINAL AND 3 COPIES IF ASSIGNED TO SAME UNIT AS ACCUSED.
SUBMIT ORIGINAL AND 4 COPIES IF NOT ASSIGNED TO SAME UNIT AS ACCUSED.

TO: SUPERINTENDENT OF POLICE

ATTENTION

☐ ADMINISTRATOR IN CHARGE, OFFICE OF PROFESSIONAL STANDARDS
☒ ASSISTANT DEPUTY SUPERINTENDENT, INTERNAL AFFAIRS DIVISION

FROM - INVESTIGATOR'S NAME Spratte, James R.		RANK Lt.	STAR NO. 555	SOCIAL SEC. NO. [REDACTED]	EMPLOYEE NO. [REDACTED]	UNIT ASSIGN. 715B
ADDRESS OF INCIDENT 3900 S. Michigan		DATE OF INCIDENT - TIME 12 Jan 03 - 1010 Hrs.		BEAT OF INCIDENT 0212	LOCATION CODE* 03	
NAME 1. Watts, Ronald		RANK Sgt.	STAR NO. 2640	SOCIAL SEC. NO. [REDACTED]	EMPLOYEE NO. [REDACTED]	UNIT ASSIGN. 715B
SEX/RACE 1. M/1		D.O.B. [REDACTED] 63	DATE OF APPOINTMENT 18 Jan 94		DUTY STATUS (TIME OF INCIDENT) <input checked="" type="checkbox"/> ON DUTY <input type="checkbox"/> OFF DUTY	
IF APPLICABLE - DATE ARRESTED / INDICTED 1. DNA		CHARGES DNA		COURT BRANCH DNA	DISPOSITION & DATE DNA	
NAME [REDACTED]		ADDRESS** [REDACTED]	CITY STATE [REDACTED]	TELEPHONE [REDACTED]	SEX/RACE M/1	D.O.B./AGE [REDACTED] 1/21
NAME [REDACTED]		ADDRESS** [REDACTED]	CITY STATE [REDACTED]	TELEPHONE [REDACTED]	SEX/RACE [REDACTED]	D.O.B./AGE [REDACTED]
NAME [REDACTED]		ADDRESS** [REDACTED]	CITY STATE [REDACTED]	TELEPHONE [REDACTED]	SEX/RACE [REDACTED]	D.O.B./AGE [REDACTED]

☐ SEE ATTACHED SHEET FOR ADDITIONAL ACCUSED, COMPLAINANTS, VICTIMS, WITNESSES.

ALLEGATIONS

The Complainant alleges that Sergeant Watts and several plainclothes officers entered the above location and damaged the property and left the scene.

The Complainant alleges that the same officers and Sgt. Watts stated, "If we see you again, we will plant drugs on you."

ARREST: None

I.A.D. LOCATION CODES*

01 Food Sales/Restaurant
02 Tavern/Liquor Store
03 Other Business Establishment
04 Police Building
05 Lockup Facility
06 Police Maintenance Facility
07 CPD Automotive Pound Facility
08 Other Police Property
09 Police Communications System
10 Court Room

11 Public Transportation Veh./Facility
12 Park District Property
13 Airport
14 Public Property Other
15 Other Private Premise
16 Expressway/ Interstate System
17 Public Way - Other
18 Waterway, Incl. Park District
19 Private Residence

I.A.D. PHYSICAL CONDITION CODES+

01 No Visible Injury - Apparently Normal
02 No Visible Injury - Under Influence
03 Injured, Not Hospitalized
04 Injured, Not Hospitalized - Under Influence
05 Injured, Hospitalized
06 Injured, Hospitalized - Under Influence
07 Injured, Refused Medical Aid
08 Injured, Refused Medical Aid - Under Influence
09 Deceased
10 Deceased - Under Influence

** IF CPD MEMBER, LIST RANK, STAR, SOCIAL SECURITY, EMPLOYEE NOS. IN ADDRESS BOX, PAX/BELL IN TELEPHONE BOX.

CPD-44.112A (1/84)

COMPUTER GENERATED FORM

C.R. NO.

287000

Ex. A

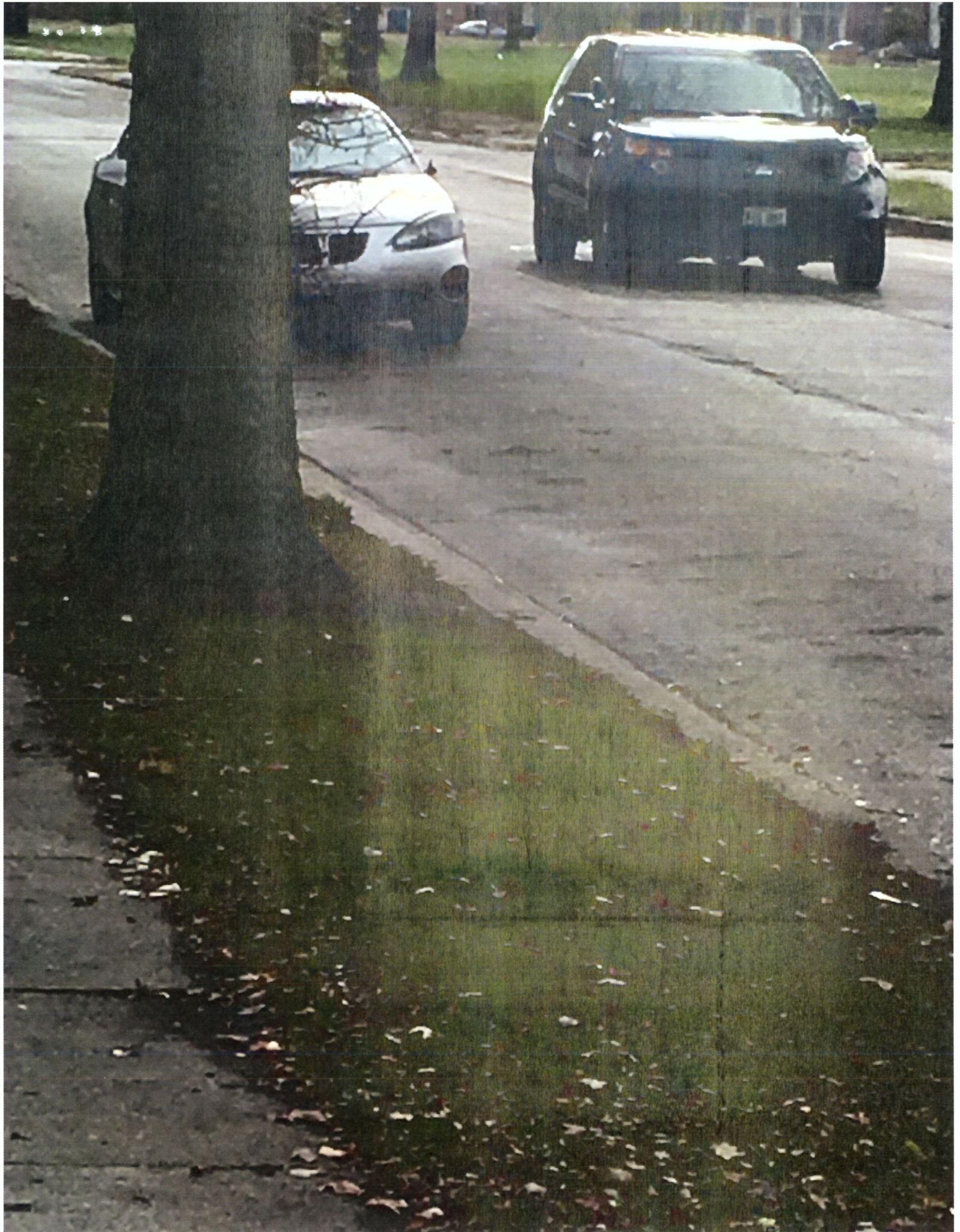


Exhibit B.