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KENTUCKIANA
— COURT REPORTERS —

MASTER DOCKET CASE NO. 19-CV-01717

**IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS**

**DEPONENT:
EDDIE JOHNSON**

**DATE:
August 31, 2022**



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1 CPD and the federal government into a CP officer doesn't
2 lead to charges, does CPD ever still do anything?
3 Do they still ever act?

4 MR. BATTLE: Going to object to the fact that
5 incomplete hypothetical. Go ahead and answer,
6 if you can.

7 A So if it didn't lead to criminal charges, then
8 sometimes CPD would do internal investigation. Because
9 it might not lead to any criminal charges, but it could
10 be something that was a violation of policy, or things
11 of that nature. So we would still look at the
12 investigation at the conclusion of the criminal portion.

13 Q Were you ever given any specifics about any of
14 the evidence that the federal government with CPD
15 developed against Watts and other members of this team?

16 A No.

17 Q Did you ever ask for that information?

18 A So with Watts and Mohammad, they were -- prior
19 to me becoming superintendent, as far as I knew, they
20 had been indicted, went to prison. I don't know if they
21 were out of prison at the time that I became
22 superintendent. So, there would've been no need for me
23 to inquire about them. As far as the other members of
24 the team goes, when we got notification from the state's
25 attorney's office concerning their credibility issues,

1 I knew that I personally reached out to the
2 US Attorney's office and the FBI to ask them, did they
3 have anything at that point that would suggest that I
4 should take further action against those officers?
5 If they could share it with me, fine.
6 If not, I understood. But if I were to take a job
7 action against them, was -- did they have any reason to
8 think that they had evidence that would suggest that?
9 And they said, no.

10 **Q Who did you talk to at the US Attorney's**
11 **office?**

12 A It would've been -- I can't remember if Zach
13 Fardon was the US Attorney at the time or John Lausch,
14 but whichever one of them was in charge, I would've
15 reached out to that person.

16 **Q Did you talk directly to the US Attorney at**
17 **the time?**

18 A Yes.

19 **Q When did you make that -- was it a call or a**
20 **letter or --**

21 A No, it was a phone call.

22 **Q And about what time period did you make that**
23 **call?**

24 A It would've been around the time we received
25 those documents.

1 Q November 2017?

2 A Yes.

3 Q Is it a call that had been set up by, like, a
4 staff member or did you just pick up the phone and call?

5 A No, we had personal relationships, so I
6 would've just picked up the phone and called.

7 Q About how long was the conversation or
8 conversations?

9 A My best recollection, maybe 10 minutes or so.

10 Q Was it just one phone call?

11 A Phone call for me asking if there was anything
12 I should be concerned with, and then the phone -- the
13 return call saying no.

14 Q So it wasn't like you called, they said
15 immediately no. They looked into it.

16 A No, they looked -- they -- I'm going to
17 assume they looked into it because they -- it was a few
18 days before both of them got back to me.

19 Q Who did you talk to at the FBI?

20 A It would've been the SAC. Jeff Sallette.

21 Q I'm sorry. Could you spell that last name?

22 A S-A-L-L-E-T-T-E, I believe. He might get me
23 if I misspell his name.

24 Q Jeff Sallette, though?

25 A Yes.

1 Q Okay.

2 A To the best of my knowledge.

3 Q He's the special agent in charge of the
4 Chicago office at the time?

5 A Correct.

6 Q Was it the same process? You just picked up
7 the phone, called and he called you back later?

8 A Correct.

9 Q And what specifically did you ask either
10 Fardon or Lausch, and then Sallette?

11 A I don't remember specifically how the
12 conversation went, but I would have said, "Listen,
13 I have these officers that can no longer testify at
14 court that were involved in the Watts case. If there's
15 any reason I should have a concern about any criminal
16 activity or any evidence that might come forward later,
17 that would suggest they shouldn't be on the street.
18 You don't have to share it with me if you can't, but at
19 the very least, I need to know so that I can relieve
20 them of their police powers if that's appropriate."

21 Q Did you just ask them about criminal activity?

22 A Any activity that would suggest relieving them
23 of their police powers.

24 Q Did you give them any guidelines about what
25 activity would warrant relieving them of police powers?

1 A No.

2 Q In your mind, what types of activity would you
3 have been looking for that would've justified relieving
4 those officers of their police powers?

5 MR. BURNS: Objection to form of question.

6 MS. WEST: Join.

7 A It wouldn't have been anything specifically,
8 but if there's a criminal investigation, it would be
9 criminal allegations, I would imagine. So, I -- there
10 was nothing that specifically, because I didn't want to
11 taint that response from them. I just wanted to know if
12 there was something that I should be concerned about.

13 Q Did you go back and ask anyone in Internal
14 Affairs the same question?

15 A So when you say same question, was there
16 anything that CPD should be concerned with?

17 Q Yeah. So, did you go back to -- it was a
18 joint investigation, right? So, I -- let me back up a
19 sec. I was making an assumption but tell me if I'm
20 right about this. You called the FBI and the US
21 Attorney's office because you knew they did a joint
22 investigation into, at least Watts and Mohammad, right?

23 A Correct.

24 Q And you are aware that, and would've, at a
25 minimum included looking at other officers' activities?

A Correct.

Q That's the reason you called them to ask if there was anything they knew about the other officers that would warrant relieving them of police powers, right?

A Correct.

Q And the joint investigation included the Chicago Police Department?

A Correct.

Q So did you go back and talk to the division or divisions at CPD that were involved in the joint investigation?

A Yeah. I spoke to them prior to reaching out to the US Attorney and the FBI.

Q Okay. Who did you speak to at the CPD before you reached out to the FBI and the US Attorney?

A I would have asked the General Counsel if she had any information. And I don't recall if Eddie Welch or Keith Callaway were the chiefs, both of them at different times were Chiefs of Internal Affairs, but whoever the Chief was at the time, I would have inquired to that person if there was something there that we had internally that would suggest relieving them of their police powers.

Q And were those -- did you get no answer for

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

ORIGINAL

IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS

DEPONENT: JUAN RIVERA

DATE: SEPTEMBER 6, 2023

REPORTER: SYDNEY LITTLE

1 someone on your team did or both?

2 A. It could have been both. Again, we had
3 quarterly meetings at times and then there are -- there
4 are times I -- I recall we were asked to go there and
5 meet on a separate date or -- or -- so it wasn't just
6 quarterly meetings, but there were other meetings that
7 we were required or requested to go.

8 Q. Do you have a specific memory of either asking
9 that question or hearing someone else ask it, or are you
10 making an assumption that it would have been asked?

11 MR. NOLAND: Object to the form. Go ahead.

12 A. I recall it being asked by -- I don't know if
13 it was -- I think it was a task force -- one of the task
14 force officers, if I remember correctly.

15 BY MR. RAUSCHER:

16 Q. Do you remember about when during the
17 investigation that was asked?

18 A. No, I would -- I would be speculating.

19 Q. And do you recall what -- the answer you got?

20 A. I'm sorry. I -- I lost track. What was the
21 question again?

22 Q. If you recall the answer to the question?

23 A. What was the question? I'm sorry.

24 Q. Oh, the question was -- well, there's a
25 question and then my question was about a question, so.

1 recollection about any of the events?

2 A. Yes, of course.

3 Q. What in particular were you -- was your
4 recollection refreshed about from reviewing your
5 deposition?

6 MR. NOLAND: Objection. Form. Over broad. Go
7 ahead.

8 A. I -- I -- mainly time frame, more or less, the
9 time frame as to how the investigation progressed.

10 BY MR. RAUSCHER:

11 Q. The investigation into Watts and Mohammed?

12 A. Yes.

13 Q. Do you know if the investigation ever looked
14 at other officers on the tactical team?

15 A. I -- I -- I believe we asked, and I don't
16 recall any other names. Again, that's my recollection,
17 but I know that the two main officers were Watts and
18 Mohammed.

19 Q. You -- who do you think you asked?

20 A. Well, we were in quarterly meetings, so we
21 would probably have asked the case agent, the FBI case
22 agents, and again, I wouldn't recall who they were, but
23 AUSAs that were involved.

24 Q. Okay. What's the time period when -- do you
25 think you asked that question personally or do you think

1 But I had asked you if either you or someone on your
2 team asked the FBI, if anyone else was implicated in the
3 investigation. And I believe you said, I think, a task
4 force member asked at a meeting you were present at.

5 A. Right.

6 Q. Is that right?

7 A. Yes, that's correct.

8 Q. Do you know how they -- well, so then it says,
9 how did they ask the question? What did they say?

10 A. I believe the question was whether any of the
11 human sources had mentioned other officers on the team
12 at that point in time. And the answer, I believe, was
13 no.

14 Q. And you don't remember when during the
15 investigation this happened?

16 A. No, I -- I would have to -- I would be
17 speculating.

18 Q. And you think the answer was no; is that
19 right?

20 A. Correct.

21 Q. Do you know who -- you don't know which
22 officer asked the question?

23 A. No, there were a few of them, but.

24 Q. Which ones do you think it could have been?

25 A. Again, I'd be speculating, but I know the task

1 force officers that might've been there would've been
2 Boehmer, Chester. Who else? I forgot the officer's
3 name. Daria -- I forgot her last name. She was a
4 liaison, but she was CPD.

5 Q. Anyone else?

6 A. Not off the top of my head. I think those
7 were --

8 Q. Did you see any of the 302 -- so you looked at
9 some 302s to prepare for your deposition?

10 A. Yes.

11 Q. Had you seen any of those three oh twos
12 before?

13 A. No.

14 Q. Did you see any 302s during the investigation?

15 A. No.

16 Q. Did any of the 302s you looked at to prepare
17 for your deposition mention other officers besides Watts
18 and Mohammed?

19 A. I -- yes, I did notice that one did mention
20 Jones, I believe.

21 Q. Was that about the theft of about \$5,000, if
22 you remember?

23 A. I -- yeah, I don't recall.

24 Q. What do you know -- what do you remember, if
25 anything, about what that 302 said about Jones?

1 factors that can affect the length of these
2 investigations.

3 BY MR. RAUSCHER:

4 Q. Do you think that Ronald Watts was wrongfully
5 convicted?

6 A. I'm sorry? Do -- do I think that Ronald Watts
7 was wrong -- no.

8 Q. No? Why do you think he was not wrongfully
9 convicted?

10 A. All the evidence, you know, shows that he was
11 willing to extort drug dealers.

12 Q. What about Mohammed? Was he wrongfully
13 convicted?

14 A. No.

15 Q. Why was -- why -- what's your position -- what
16 is your basis to say that Mohammed was not wrongfully
17 convicted?

18 A. Same thing. Again, when I was there, he -- he
19 was part of the sting operation, the successful sting
20 operation.

21 Q. Are you aware of any steps that the -- either
22 the Chicago Police Department or the FBI took to
23 determine whether other officers were involved in the
24 alleged illegal activity?

25 A. Again, going back to what I recall, I believe

1 they were all -- from what I recall -- again, they were
2 all part of a either pen register or a wiretap. And
3 towards the end of the investigation, we were adamant
4 that the -- that we knew exactly whether these officers
5 -- these other officers were involved or not. And, so
6 there were several more. I don't know if it was two
7 other sting operations that were either set up or
8 attempted after the successful sting of Watts and
9 Mohammed. And -- and that resulted in negative results.

10 **Q. Who were -- who were the targets of those**
11 **other stings?**

12 A. I -- I just -- I think it was just -- I -- I
13 don't recall. Again, I don't recall the seeing the
14 operational plan, so I don't know if they were named on
15 there or not.

16 **Q. Do you know if those stings actually took**
17 **place?**

18 A. I -- I know that was -- I know they were
19 attempted. I believe, on the second sting, like Watts
20 and Mohammed were arrested.

21 **Q. Second sting against other officers?**

22 A. Against the same group. Obviously, they --
23 Watts and Mohammed weren't arrested in the first sting.
24 The goal was to determine if other officers were also
25 involved and I believe the last -- the last attempt,

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF
3 ILLINOIS EASTERN DIVISION
4 JUDGE FRANKLIN U. VALDERRAMA
5 MAGISTRATE JUDGE SHEILA M. FINNEGAN
6 MASTER DOCKET CASE NO. 19-CV-01717
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11 IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS
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23 DEPONENT: GARRY MCCARTHY

24 DATE: JUNE 14, 2023

25 REPORTER: SYDNEY LITTLE

1 Q. And why was that? Why was there nothing
2 written?

3 MR. BURNS: Objection. Form.

4 A. I -- I'm not a big paper person. I want to
5 hear it if I have questions about it. And then if
6 there's any paper, like a picture or something like
7 that, it all went back.

8 BY MR. FLAXMAN:

9 Q. And did you ever take notes about the
10 meetings?

11 A. No.

12 Q. You also talked about this issue where your
13 department was trying to get boxes from the federal
14 investigation every so often. You remember that?

15 A. Yes.

16 Q. Did you ever communicate with federal
17 authorities about the boxes?

18 A. I may have said something to Bob Grant. I
19 don't recall. But I -- I do know this very
20 specifically. I asked Bob Grant, is there anything else
21 to this? And he said, absolutely not. It's just these
22 two officers. And when we tried to obtain more
23 information, we couldn't obtain it because federal
24 protections for the documents prevented that from
25 happening.

1 Q. And did you try to obtain that information
2 after Bob Grant told you that it was just these two
3 officers?

4 A. I believe we tried for a while to -- to Bob
5 Klimas because there was some sort of a vetting that
6 they -- the feds were talking about. And, eventually, I
7 don't think we got anything.

8 Q. Well, when you say there was some sort of
9 vetting, what do you mean?

10 A. In other words, they would -- you know, they
11 would take them and redact things and things like that.
12 But they never did any of it for us. To my
13 recollection, we got absolutely nothing.

14 Q. And given that Bob Grant had told you that
15 there's nothing else, it's just these two officers, why
16 did you want that other information?

17 A. To ensure that there was nothing else. And,
18 like I said, you know, the -- the FBI was looking at
19 criminal charges. That doesn't mean that we weren't
20 going to pursue administrative charges if there was
21 something there for that.

22 Q. And was it -- did you say that it was Klimas
23 who was the one who was mostly responsible for trying to
24 get that information?

25 A. I wouldn't say responsible. He was the guy