

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

Leonard Gipson, )  
)  
*Plaintiff,* )  
) No. 18 cv 5120  
-vs- )  
) Judge Seeger  
CITY OF CHICAGO, Former )  
CHICAGO POLICE SERGEANT ) *(Jury Demand)*  
RONALD WATTS, Former )  
OFFICER KALLATT )  
MOHAMMED, SERGEANT ALVIN )  
JONES, OFFICER ELSWORTH )  
SMITH JR., OFFICER DOUGLAS )  
NICHOLS JR., OFFICER BRIAN )  
BOLTON, OFFICER MANUEL )  
LEANO, OFFICER KENNETH )  
YOUNG, OFFICER DARREL )  
EDWARDS, OFFICER MATTHEW )  
CADMAN, MICHAEL )  
SPAARGAREN, OFFICER )  
GEORGE SUMMERS, OFFICER )  
CALVIN RIDGELL, OFFICER )  
ROBERT GONZALEZ, OFFICER )  
LAMONICA LEWIS, PHILIP )  
CLINE, DEBRA KIRBY, KAREN )  
ROWAN, and any other yet- )  
unidentified officers of the Chicago )  
Police Department, )  
)  
*Defendants.* )

# AMENDED COMPLAINT

Plaintiff, Leonard Gipson, by his attorneys, Loevy & Loevy, hereby complains against the Defendants, City of Chicago, former Chicago Police Sergeant Ronald Watts, former Chicago Police Officer Kallatt Mohammed, Sergeant Alvin Jones, Officer Elsworth J. Smith, Jr., Officer Douglas Nichols,

99. Also, consistent with this “code of silence,” the few people who stood up to Watts and his crew and/or attempted to report his misconduct were either ignored or punished, and Watts and his crew continued to engage in misconduct with impunity.

**Careers of CPD Officers Daniel Echeverria and Shannon Spaulding  
Are Nearly Ruined**

100. In 2006, two Chicago police officers, Daniel Echeverria and Shannon Spaulding learned credible information from arrestees that Watts and his crew were engaged in illegal drug activity.

101. Officer Echeverria took the allegation seriously and he reported it to a CPD supervisor. The supervisor made clear that he was not interested in learning about the allegation, and he directed Echeverria not to document the allegations.

102. Echeverria and Spaulding subsequently reported the allegations about Watts and his crew to the FBI. Soon thereafter, Echeverria and Spaulding began cooperating with the FBI, actively assisting the FBI’s investigation of Watts and his crew.

103. When their cooperation became known to officers within their CPD chain of command, Spaulding and Echeverria were labeled “rats” within the Department, their lives were threatened, and they endured all manner of professional retaliation by members of the CPD.

104. Spaulding and Echeverria subsequently sued the City for the retaliation they suffered for blowing the whistle on Watts and his crew. On the eve of trial in that case, the City settled for \$2 million.

### **CPD Officer Michael Spaargaren's Life Is Threatened**

105. Sometime in the mid-2000s, a CPD officer named Michael Spaargaren was assigned to work with Watts in public housing.

106. Spaargaren observed Watts did not inventory drugs and money that the officers seized during arrests, and Spaargaren confronted Watts about the misconduct.

107. In response, Watts threatened to put a false case against Spaargaren and made veiled threats to kill him.

108. A CPD Lieutenant in the chain of command—James Spratte—subsequently warned Spaargaren to keep his mouth shut or his life would be in danger.

109. Fearful for his life, Spaargaren opted to take a one-and-a-half-year leave of absence from CPD rather than to continue to work under Watts.

### **Citizen Complaints Go Nowhere**

110. Defendants Watts, Mohammed, and other members of Watts's tactical team had accumulated dozens of citizen complaints concerning violations of their civil rights over the years, beginning well before the misconduct Defendants committed against Mr. Gipson, and yet the City did nothing to stop the misconduct.