



MASTER DOCKET CASE NO. 19-CV-01717

IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS

DEPONENT:

DANIEL ECHEVERRIA

DATE:

May 30, 2023



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

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10 IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS
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23 DEPONENT: DANIEL ECHEVERRIA
24 DATE: MAY 30, 2023
25 REPORTER: SYDNEY LITTLE

APPEARANCES (CONTINUED)		Page 6	Page 8
1			1
2			2
3	ON BEHALF OF THE DEFENDANTS, ROBERT GONZALEZ, MANUEL		3
4	LEANO, DOUGLAS NICHOLS, JR., CALVIN RIDGELL, GEROME		4
5	SUMMERS, JR., LAMONICA LEWIS, JOHN RODRIGUEZ, ELSWORTH		5
6	SMITH, ALVIN JONES, DARRYL EDWARDS, REBECCA BOGARD,		6
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16	(Appeared Via videoconference)		16
17			17
18	Also Present: Krystal Barnes, Videographer		18
19			19
20			20
21			21
22			22
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1 that you were doing on the Watts investigation?
 2 A. In-person. He was our direct supervisor. He
 3 would meet us, you know, daily, every other day,
 4 whatever, or he'd check in on the phone. How is it
 5 going? How is it looking? What are you guys up to? Any
 6 concerns, we go to the supervisor.
 7 Q. Did your supervisor from IAD change at any
 8 point when you were working on the Watts investigation?
 9 A. Yes, it did.
 10 Q. Who did it change to?
 11 A. Tina -- Tina Skahill was no longer chief. It
 12 was Ron Rivera. And then at one point, it was no longer
 13 Tom Chester being the liaison. It was Al Baumer.
 14 Q. And do you recall approximately when that
 15 change from Chester to Baumer took place?
 16 A. No. I can't give you an exact time frame.
 17 Q. Okay. Are you familiar with the name Reggie
 18 Fisher?
 19 A. Yes.
 20 Q. Okay. Who is Reggie Fisher?
 21 A. A concerned citizen.
 22 Q. He was one of the concerned citizens? Okay.
 23 A. Remember I say it was one of the Fishers? The
 24 Fisher name?
 25 Q. Yes.

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1 A. He was a Fisher. And there was also a female,
 2 which I'll say was his mom as well.
 3 Q. Okay. I see. And how did you first become
 4 familiar with Reggie Fisher?
 5 A. I tried to catch him, too.
 6 Q. Is he someone that you debriefed when you were
 7 in narcotics?
 8 A. No.
 9 Q. Did he give you information related to
 10 misconduct by Watts and members of his team?
 11 A. He may have elaborated that one time.
 12 Q. What information did he provide to you?
 13 A. That Watts was a tit for tat type of thing.
 14 Q. And what did you understand that to mean?
 15 A. He wants to get paid.
 16 Q. What about do -- did you know anyone with the
 17 last name Mines?
 18 A. I can't -- don't remember, don't recall.
 19 MS. KLEINHAUS: Okay. Folks on Zoom, were you
 20 sent a link with some potential exhibits today?
 21 MR. GAINER: Yes. We received a link earlier
 22 and then one that just said updated exhibits just
 23 now.
 24 MS. KLEINHAUS: Okay. Great. Thank you. Okay.
 25 Sir, I'm going to give you what we'll mark as our

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1 first exhibit. Folks on Zoom, this is marked at the
 2 bottom City BG 023839 through 40.
 3 (EXHIBIT 1 MARKED FOR IDENTIFICATION)
 4 BY MS. KLEINHAUS:
 5 Q. Here, you can just take a moment to review
 6 that and then I'll ask you some questions about it.
 7 A. I just skim over it.
 8 Q. Do you have a --
 9 A. I'm not going to read word for word. I can
 10 just recall as we go.
 11 Q. Okay. Are you -- have you seen this document
 12 before?
 13 A. I don't think I have.
 14 Q. Okay. And having reviewed it, do you know who
 15 drafted this document?
 16 A. No.
 17 Q. Okay. It summarizes some information that you
 18 and Shannon Spalding had gathered related to the
 19 investigation of Ronald Watts, correct?
 20 A. Okay.
 21 MR. GAINER: Objection. Foundation.
 22 BY MS. KLEINHAUS:
 23 Q. And having reviewed this, it discusses in the
 24 first -- all right. I'm sorry, this -- the second full
 25 paragraph.

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1 MR. NOLAND: Just -- I might get designated
 2 reading of detail --
 3 MS. KLEINHAUS: Oh, sure. Okay. Sure. Let's
 4 go on the confidential record, please.
 5 (CONFIDENTIAL PORTION REDACTED)
 6 MS. KLEINHAUS: All right. I don't have any
 7 other questions for you. We can go off the record.
 8 THE VIDEOGRAPHER: All right. We are off the
 9 record. The time is --
 10 MR. BAZAREK: Well, are we -- I thought that
 11 the officer is here until 3:30?
 12 THE WITNESS: Do you have any questions?
 13 MR. BAZAREK: Yes.
 14 MS. KLEINHAUS: Can we -- let's get this on the
 15 record, okay?
 16 THE REPORTER: We're still on.
 17 MS. KLEINHAUS: Oh, we're still on.
 18 THE REPORTER: Yeah.
 19 MS. KLEINHAUS: I'm sorry, my bad. So my
 20 understanding is that defendants are asking this
 21 witness questions tomorrow and reserved tomorrow to
 22 do that; is that right?
 23 MR. BAZAREK: Well, I thought we were going to
 24 go a full day. If we're not going a full day,
 25 there's still 15 minutes left, right?

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1 MS. KLEINHAUS: Sure. I mean, you can go ahead
 2 and start if you want to start today.
 3 MR. BAZAREK: Okay.
 4 MS. KLEINHAUS: And the witness wants to stay.
 5 He's already had several hours on the record. So
 6 it's up to you, sir?
 7 MR. BAZAREK: No. Officer --
 8 THE WITNESS: I'm done for today. You can
 9 depose me tomorrow with corporation Counsel.
 10 MS. KLEINHAUS: Okay. All right. We'll go off
 11 the record.
 12 THE VIDEOGRAPHER: We're now off the record.
 13 The time is 3:13 p.m.

14 (DEPOSITION CONCLUDED AT 3:13 P.M. (CT))

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1 CERTIFICATE OF REPORTER
 2 STATE OF ILLINOIS
 3
 4 I do hereby certify that the witness in the foregoing
 5 transcript was taken on the date, and at the time and
 6 place set out on the Title page hereof by me after first
 7 being duly sworn to testify the truth, the whole truth,
 8 and nothing but the truth; and that the said matter was
 9 recorded by me and then reduced to typewritten form
 10 under my direction, and constitutes a true record of the
 11 transcript as taken, all to the best of my skills and
 12 ability. I certify that I am not a relative or employee
 13 of either counsel, and that I am in no way interested
 14 financially, directly or indirectly, in this action.



A handwritten signature in black ink, appearing to read "Sydney Little".

19
 20
 21
 22 SYDNEY LITTLE,
 23 COURT REPORTER / NOTARY
 24 COMMISSION EXPIRES ON: 03/18/2026
 25 SUBMITTED ON: 06/07/2023