



KENTUCKIANA
— COURT REPORTERS —

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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11 IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS
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23 DEPONENT: DANIEL ECHEVERRIA

24 DATE: MAY 30, 2023

25 REPORTER: SYDNEY LITTLE

<p style="text-align: right;">Page 6</p> <p style="text-align: center;">APPEARANCES(CONTINUED)</p> <p>1 ON BEHALF OF THE DEFENDANTS, ROBERT GONZALEZ, MANUEL</p> <p>2</p> <p>3 LEANO, DOUGLAS NICHOLS, JR., CALVIN RIDGELL, GEROME</p> <p>4 SUMMERS, JR., LAMONICA LEWIS, JOHN RODRIGUEZ, ELSWORTH</p> <p>5 SMITH, ALVIN JONES, DARRYL EDWARDS, REBECCA BOGARD,</p> <p>6 BRIAN BOLTON, MIGUEL CABRALES, FRANKIE LANE:</p> <p>7 William Bazarek, Esquire</p> <p>8 Hale & Monico</p> <p>9 Monadnock Building</p> <p>10 53 West Jackson Boulevard</p> <p>11 Suite 337</p> <p>12 Chicago, Illinois 60604</p> <p>13 Telephone No.: (312) 500-2951</p> <p>14 E-mail: awest@HaleMonico.com</p> <p>15 (Appeared Via videoconference)</p> <p>16</p> <p>17 Also Present: Krystal Barnes, Videographer</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p style="text-align: center;">STIPULATION</p> <p>1</p> <p>2</p> <p>3 The VIDEO deposition of DANIEL ECHEVERRIA was taken at</p> <p>4 LOEVY & LOEVY, 311 NORTH ABERDEEN STREET, CHICAGO,</p> <p>5 ILLINOIS 60607, in person and via videoconference in</p> <p>6 which some participants attended remotely, on TUESDAY</p> <p>7 the 30th day of MAY 2023 at 10:07 a.m. (CT); said VIDEO</p> <p>8 deposition was taken pursuant to the FEDERAL Rules of</p> <p>9 Civil Procedure.</p> <p>10</p> <p>11 It is agreed that SYDNEY LITTLE, being a Notary Public</p> <p>12 and Court Reporter for the State of ILLINOIS, may swear</p> <p>13 the witness.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 7</p> <p style="text-align: center;">INDEX</p> <p>1</p> <p>2</p> <p>3 PROCEEDINGS</p> <p>4 DIRECT EXAMINATION BY MS. KLEINHAUS</p> <p>5 CONFIDENTIAL PORTION REDACTED</p> <p>6</p> <p>7</p> <p style="text-align: center;">EXHIBITS</p> <p>8 Exhibit</p> <p>9 1 - Synopsis of City of Chicago -</p> <p>10 CITY-BG-023839-023840 (CONFIDENTIAL)</p> <p>11 2 - Federal Bureau of Investigation</p> <p>12 Transcription January 26, 2009</p> <p>13 - FBI00077-00088 (CONFIDENTIAL)</p> <p>14 3 - To-From Memorandums (CONFIDENTIAL)</p> <p>15 4 - Cooperating Individual Request Organized</p> <p>16 Crime Division/Chicago Police Department</p> <p>17 August 17, 2010 - CITY-BG-060365-060369</p> <p>18 5 - Federal Bureau of Investigation</p> <p>19 Transcription September 15, 2009</p> <p>20 (CONFIDENTIAL)</p> <p>21</p> <p>22 [EXHIBITS 2-5 MARKED IN CONFIDENTIAL TRANSCRIPT]</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 9</p> <p style="text-align: center;">PROCEEDINGS</p> <p>1</p> <p>2 THE VIDEOGRAPHER: My name is Krystal Barnes.</p> <p>3 I'm the videographer today. And Sydney Little is</p> <p>4 the court reporter. Today is the 30th date of May</p> <p>5 2023, and the time is 10:07 a.m. Central Time. We</p> <p>6 are at offices of Loevy & Loevy to take the</p> <p>7 deposition of Daniel Echeverria in the matter of the</p> <p>8 last coordinated pretrial proceeding pending in the</p> <p>9 United States District Court in the northern</p> <p>10 District of Illinois, the Eastern Division, Master</p> <p>11 Docket case number 19-CV- 01717. Will Counsel</p> <p>12 please identify themselves for the record?</p> <p>13 MS. KLEINHAUS: Good morning, Theresa Kleinhaus</p> <p>14 on behalf of the Loevy plaintiffs.</p> <p>15 MR. TEPFER: Josh Tepfer on behalf of the Loevy</p> <p>16 plaintiff.</p> <p>17 MR. FLAXMAN: Joel Flaxman for the Flaxman</p> <p>18 plaintiffs.</p> <p>19 MR. NOLAND: Daniel Nolan for the City of</p> <p>20 Chicago and Supervisory Defendants.</p> <p>21 MR. BAZAREK: William Bazarek for individual</p> <p>22 defendants represented by Hale & Monico.</p> <p>23 MR. GAINER: Brian Gainer on behalf of Ronald</p> <p>24 Watts. For those of you in the room, if you could</p> <p>25 just keep your voices up. I'm having a little hard</p>

<p style="text-align: right;">Page 82</p> <p>1 that you were doing on the Watts investigation?</p> <p>2 A. In-person. He was our direct supervisor. He</p> <p>3 would meet us, you know, daily, every other day,</p> <p>4 whatever, or he'd check in on the phone. How is it</p> <p>5 going? How is it looking? What are you guys up to? Any</p> <p>6 concerns, we go to the supervisor.</p> <p>7 Q. Did your supervisor from IAD change at any</p> <p>8 point when you were working on the Watts investigation?</p> <p>9 A. Yes, it did.</p> <p>10 Q. Who did it change to?</p> <p>11 A. Tina -- Tina Skahill was no longer chief. It</p> <p>12 was Ron Rivera. And then at one point, it was no longer</p> <p>13 Tom Chester being the liaison. It was Al Baumer.</p> <p>14 Q. And do you recall approximately when that</p> <p>15 change from Chester to Baumer took place?</p> <p>16 A. No. I can't give you an exact time frame.</p> <p>17 Q. Okay. Are you familiar with the name Reggie</p> <p>18 Fisher?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Who is Reggie Fisher?</p> <p>21 A. A concerned citizen.</p> <p>22 Q. He was one of the concerned citizens? Okay.</p> <p>23 A. Remember I say it was one of the Fishers? The</p> <p>24 Fisher name?</p> <p>25 Q. Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 first exhibit. Folks on Zoom, this is marked at the</p> <p>2 bottom City BG 023839 through 40.</p> <p>3 (EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>4 BY MS. KLEINHAUS:</p> <p>5 Q. Here, you can just take a moment to review</p> <p>6 that and then I'll ask you some questions about it.</p> <p>7 A. I just skim over it.</p> <p>8 Q. Do you have a --</p> <p>9 A. I'm not going to read word for word. I can</p> <p>10 just recall as we go.</p> <p>11 Q. Okay. Are you -- have you seen this document</p> <p>12 before?</p> <p>13 A. I don't think I have.</p> <p>14 Q. Okay. And having reviewed it, do you know who</p> <p>15 drafted this document?</p> <p>16 A. No.</p> <p>17 Q. Okay. It summarizes some information that you</p> <p>18 and Shannon Spalding had gathered related to the</p> <p>19 investigation of Ronald Watts, correct?</p> <p>20 A. Okay.</p> <p>21 MR. GAINER: Objection. Foundation.</p> <p>22 BY MS. KLEINHAUS:</p> <p>23 Q. And having reviewed this, it discusses in the</p> <p>24 first -- all right. I'm sorry, this -- the second full</p> <p>25 paragraph.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. He was a Fisher. And there was also a female,</p> <p>2 which I'll say was his mom as well.</p> <p>3 Q. Okay. I see. And how did you first become</p> <p>4 familiar with Reggie Fisher?</p> <p>5 A. I tried to catch him, too.</p> <p>6 Q. Is he someone that you debriefed when you were</p> <p>7 in narcotics?</p> <p>8 A. No.</p> <p>9 Q. Did he give you information related to</p> <p>10 misconduct by Watts and members of his team?</p> <p>11 A. He may have elaborated that one time.</p> <p>12 Q. What information did he provide to you?</p> <p>13 A. That Watts was a tit for tat type of thing.</p> <p>14 Q. And what did you understand that to mean?</p> <p>15 A. He wants to get paid.</p> <p>16 Q. What about do -- did you know anyone with the</p> <p>17 last name Mines?</p> <p>18 A. I can't -- don't remember, don't recall.</p> <p>19 MS. KLEINHAUS: Okay. Folks on Zoom, were you</p> <p>20 sent a link with some potential exhibits today?</p> <p>21 MR. GAINER: Yes. We received a link earlier</p> <p>22 and then one that just said updated exhibits just</p> <p>23 now.</p> <p>24 MS. KLEINHAUS: Okay. Great. Thank you. Okay.</p> <p>25 Sir, I'm going to give you what we'll mark as our</p>	<p style="text-align: right;">Page 85</p> <p>1 MR. NOLAND: Just -- I might get designated</p> <p>2 reading of detail --</p> <p>3 MS. KLEINHAUS: Oh, sure. Okay. Sure. Let's</p> <p>4 go on the confidential record, please.</p> <p>5 (CONFIDENTIAL PORTION REDACTED)</p> <p>6 MS. KLEINHAUS: All right. I don't have any</p> <p>7 other questions for you. We can go off the record.</p> <p>8 THE VIDEOGRAPHER: All right. We are off the</p> <p>9 record. The time is --</p> <p>10 MR. BAZAREK: Well, are we -- I thought that</p> <p>11 the officer is here until 3:30?</p> <p>12 THE WITNESS: Do you have any questions?</p> <p>13 MR. BAZAREK: Yes.</p> <p>14 MS. KLEINHAUS: Can we -- let's get this on the</p> <p>15 record, okay?</p> <p>16 THE REPORTER: We're still on.</p> <p>17 MS. KLEINHAUS: Oh, we're still on.</p> <p>18 THE REPORTER: Yeah.</p> <p>19 MS. KLEINHAUS: I'm sorry, my bad. So my</p> <p>20 understanding is that defendants are asking this</p> <p>21 witness questions tomorrow and reserved tomorrow to</p> <p>22 do that; is that right?</p> <p>23 MR. BAZAREK: Well, I thought we were going to</p> <p>24 go a full day. If we're not going a full day,</p> <p>25 there's still 15 minutes left, right?</p>

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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.



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