

EXHIBIT 3

EXPERT OPINIONS OF DR. JON M. SHANE

Supplemental Opinion

SUBMITTED TO:

Wally Hilke, Esq.
Loevy & Loevy
311 N. Aberdeen St., 3rd Floor
Chicago, IL 60607

June 3, 2024

PERTAINING TO:

Lionel White, Plaintiff,

v.

City Of Chicago, Ronald Watts, Phillip Cline, Debra Kirby, Alvin Jones, Elsworth Smith, Jr., Kallatt Mohammed, Manuel Leano, Brian Bolton, Robert Gonzalez, And Douglas Nichols

Case No. 1:17-Cv-02877

Leonard Gipson, Plaintiff,

v.

City Of Chicago, Former Chicago Police Sergeant 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,
Case No. 1:18-Cv-05120

Ben Baker and Clarissa Glenn

v.

City Of Chicago, Former Chicago Police Sergeant Ronald Watts, Officer Kallatt Mohammed, Sergeant Alvin Jones, Officer Robert Gonzalez, Officer Cabrales, Officer Douglas Nichols, Jr., Officer Manuel S. Leano, Officer Brian Bolton, Officer Kenneth Young, Jr.,

Officer Elsworth J. Smith, Jr., Philip J. Cline, Karen Rowan, Debra Kirby, and Other as Yet-Unidentified Officers of The Chicago Police Department

In The United States District Court For The Northern District Of Illinois Eastern Division

Case No: 1:16-Cv-08940

Chicago, Illinois

PREPARED BY:

Dr. Jon M. Shane
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I am Dr. Jon M. Shane. I previously submitted an expert report in the cases of *White v. Chicago*, *Gipson v. Chicago*, and *Baker & Glenn v. Chicago* dated April 1, 2024. That report and its attachments are attached and incorporated here.

I have also reviewed the following transcripts of interviews during COPA reinvestigations of alleged misconduct by Ronald Watts and the officers he supervised. I find those transcripts consistent with the opinions I expressed in my previous report:

- COPA Investigation 1085254: Attachments 130 (Alvin Jones), 131 (Elsworth Smith), 133 (Elsworth Smith), and 154 (Audio file, interview of Leano 4.24.2006).
- COPA Investigation 1087717: Attachments 119 (Audio file, Interview of Douglas Nichols, Jr. 7/19/19), 222 (Statement of Gerome Summers Jr.), 507 (Calvin Ridgell).
- COPA Investigation 1087742: Attachments 110 (Alvin Jones), 252 (Alvin Jones), 254 (Elsworth Smith), 256 (Alvin Jones), 258 (Robert Gonzalez), and 259 (Manuel Leano).
- COPA Investigation 1089229: Attachments 112 (Robert Gonzalez), 148 (Gerome Summers), 157 (Brian Bolton), 170 (John Rodriguez), 175 (Calvin Ridgell), 179 (Darryl Edwards), 334 (Kenneth Young), and 495 (Alvin Jones).
- COPA Investigation 1092530: Attachment 255 (Alvin Jones).

After reviewing the materials, they do not change my opinion.

ACKNOWLEDGEMENT

This report provides my opinion based on the available information at this time. I presume the information provided to me is accurate and correct. If additional information becomes available at a later time, then I may submit a supplemental report. Depending on the new information, my opinion in this report may or may not change. My opinion is based upon a reasonable degree of professional certainty.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 3, 2024

/s/ Jon M. Shane

Jon Shane