

Transcript of the Testimony of **Officer
Ronald Bonadurer**

Date: July 24, 2017

Case: Jerry Boyle v. City of Chicago, et al.

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

JERRY BOYLE, on behalf of)
himself and a class of others)
similarly situated)

Plaintiff,)

No.17 CV 00244

vs.)

CITY OF CHICAGO, Former)
Superintendent of the Chicago)
Police Department GARRY)
MCCARTHY; Former)
Superintendent of the Chicago)
Police Department JOHN)
ESCALANTE; Current)
Superintendent of the Chicago)
Police Department EDDIE)
JOHNSON, Former Chief of the)
Bureau of Organized Crime)
NICHOLAS ROTI; Current Chief)
of the Bureau of Organized)
Crime ANTHONY J. RICCIO;)
Bureau of Organized Crime)
Technical Support Section)
Supervisors JACK COSTA and)
JAMES WASHBURN; unknown)
Chicago Police Department)
Supervisor JOHN DOES; and)
unknown Chicago Police)
Department Cell Site)
Simulator Operator JOHN DOES,

Defendants.

1 The deposition of
2 OFFICER RONALD BONADURER, taken under oath at
3 311 North Aberdeen Street, 3rd Floor, Chicago,
4 Illinois, at 10:05 on Monday, July 24, 2017
5 pursuant to the Rules of the United States
6 District Court, Northern District of Illinois,
7 before Carol M. Siebert-LaMonica, C.S.R. No.
8 084.001355 in and for the County of Cook and
9 State of Illinois, pursuant to notice.

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APPEARANCES :

LOEVY & LOEVY, by
MR. MATTHEW TOPIC
MR. JOSHUA BURDAY
311 North Aberdeen Street, 3rd Floor
Chicago, Illinois 60607
Appeared on behalf of the plaintiffs;

CITY OF CHICAGO
DEPARTMENT OF LAW
MR. ANDREW S. MINE
MS. TARA KENNEDY
30 North LaSalle Street, Suite 1230
Chicago, IL 60602
Appeared on behalf of the defendants;

ALSO PRESENT :

MS. HOPE DELAP
MS. MADDIE LEATHERMAN

- - - - -

1 OFFICER RONALD BONADURER,
2 called as a witness herein, having been first
3 duly sworn, was examined and testified as
4 follows:

5 E X A M I N A T I O N

6 BY MR. TOPIC:

7 Q. How are you today?

8 A. Good.

9 Q. Would you state and spell your name,
10 please?

11 A. Officer Ron Bonadurer,
12 B O N A D U R E R.

13 Q. Have you been deposed before?

14 A. Yes.

15 Q. How many times?

16 A. I believe two.

17 Q. And were those in your capacity as a
18 police officer?

19 MR. MINE: Object to the form in your
20 capacity, answer if you understand.

21 BY MR. TOPIC:

22 Q. I will rephrase the question.

23 When you attended the those
24 depositions did you believe you were in a

1 capacity as a Chicago Police Officer or in a
2 private capacity?

3 A. It would be a private --

4 Q. Okay.

5 A. -- capacity.

6 Q. Okay. You understand you are
7 testifying under oath, correct?

8 A. Yes.

9 Q. I think my question usually is pretty
10 clear, but if any question isn't clear just let
11 me know and I will rephrase the question, okay?

12 A. Yes.

13 Q. And if you answer the question I'm
14 going to assume you understood it, is that
15 fair?

16 A. Yes.

17 Q. Is there anything that would interfere
18 with your ability to provide truthful and
19 complete testimony today?

20 A. No.

21 Q. You are not taking any medications
22 that interfere with your memory, for example?

23 A. No.

24 Q. And we can take a break at any time,

1 just let me know if you want to take a break,
2 just so long as there is not a pending
3 question.

4 A. Yes.

5 Q. Have you ever testified at trial
6 before?

7 A. Yes.

8 Q. Was that one of the same cases in
9 which you have been deposed?

10 A. No.

11 Q. Okay. And what kind of case was it
12 when you testified at trial?

13 A. Criminal cases.

14 Q. So have you testified more than once
15 at trial?

16 A. Yes.

17 Q. Were those all in your capacity as a
18 police officer?

19 A. Yes.

20 Q. Did any of them involve surveillance?

21 A. I don't understand the question.

22 Q. Sure.

23 MR. MINE: Object to the form.
24

1 BY MR. TOPIC:

2 Q. Did your testimony in any of those
3 cases, did any of it relate to surveillance by
4 the Chicago Police Department?

5 A. In what capacity? I don't understand
6 the question.

7 Q. Let me break it down.
8 How many times have you testified
9 at trial as a Chicago Police Officer?

10 A. Numerous.

11 Q. More or less than 10?

12 A. I believe so.

13 Q. What are your duties as a Chicago
14 Police Officer? What Division do you work in?
15 What do you do?

16 A. I work in the Organized Crime Division
17 and I work in the tech lab of the Organized
18 Crime Division.

19 Q. And the testimony you have provided in
20 criminal trials, did that relate to your work
21 in the Organized Crime Division?

22 A. At times.

23 Q. And at times it did not?

24 A. Correct.

1 Q. When it did not, just tell me
2 generally what it pertained to?

3 A. That was during the period when I was
4 assigned to patrol, so it would be basic;
5 traffic, criminal cases. I was either the
6 paper car or that I was involved in the arrest.

7 Q. Let's set aside the patrol.

8 The other times you testified at
9 trial, did you provide testimony that discussed
10 surveillance?

11 MR. MINE: Objection to the form, vague
12 as to what you mean by surveillance.

13 BY MR. TOPIC:

14 Q. Do you ever use the word
15 "surveillance"? Have you ever used that term
16 in your capacity as a Chicago Police Officer?

17 A. Yes.

18 Q. Okay. What does the term mean to you?

19 MR. MINE: Same objection. He may mean
20 something by it, but my objection is to what
21 you meant by it.

22 BY MR. TOPIC:

23 Q. Could we have the last question read
24 back?

1 (Question read.)

2 Q. What does the term "surveillance" mean
3 to you?

4 A. Observation.

5 Q. And is some surveillance done by
6 Chicago Police Department electronically?

7 A. Yes.

8 Q. The cases in which you testified,
9 setting aside when you were acting as a patrol
10 officer, did any of them involve electronic
11 surveillance?

12 A. Yes.

13 Q. Is there an issue with the question?

14 A. No.

15 Q. Can you give me some identifier of any
16 of those cases? Do you remember a defendant
17 name or is there anything you can recall about
18 those?

19 A. No.

20 Q. When is the last time you provided any
21 testimony about electronic surveillance?

22 A. I don't recall.

23 Q. Do you know whether it was in the last
24 year?

1 A. I don't recall.

2 Q. Is there a record kept of that
3 somewhere, to your knowledge?

4 A. Not that I'm aware of.

5 Q. Is there any paperwork you fill out
6 when you testify in Court?

7 A. Court documents. I would have no
8 record of my own.

9 Q. There is no Chicago Police Department
10 paperwork that's filled out when you testify at
11 a criminal trial?

12 A. Not that I'm aware of.

13 Q. Did any of those case involve cell
14 site simulators?

15 A. Not that I'm aware of.

16 Q. Have you ever been disciplined as a
17 Chicago Police Officer?

18 A. Yes.

19 Q. Can you describe that, please?

20 A. I was -- I don't recall the
21 particulars. I served a one-day suspension, but
22 I don't recall the particulars of the incident.

23 Q. Do you know what rule you were found
24 to have violated?

1 A. I don't recall.

2 Q. Do you know whether it involves
3 honesty?

4 A. I don't recall.

5 Q. Do you know approximately when that
6 occurred?

7 A. No.

8 Q. Do you know whether it was in the last
9 year?

10 A. I don't recall.

11 Q. Okay. Do you have any records of
12 that?

13 A. No, I don't.

14 Q. Could you describe for me your job
15 duties currently?

16 A. Police technician, maintain the
17 equipment that is assigned to officers that are
18 involved in drug buys, narcotic dealings,
19 duplications of recordings that they make.

20 Q. And one of the pieces of equipment
21 that's maintained by the Electronic and
22 Technical Support Unit is one or more cell site
23 simulators, is that correct?

24 MR. MINE: Object to the form, vague

1 and argumentative as to one and more.

2 MR. TOPIC: How is that vague and
3 argumentative?

4 MR. MINE: Just is.

5 BY MR. TOPIC:

6 Q. Do you understand what I mean when I
7 say one or more, was that clear to you?

8 MR. MINE: Well, what is he supposed
9 to agree to, one or one or more. One or two.

10 BY MR. TOPIC:

11 Q. Okay. How many cell site simulators
12 does the Chicago Police Department currently
13 own?

14 A. Currently one.

15 Q. And in the past has it owned more than
16 one?

17 MR. MINE: Object to the form, vague as
18 to timeframe. Do you mean at any given --

19 MR. TOPIC: I didn't impose any
20 timeframe, so it is nothing vague about it.

21 MR. MINE: It is vague. Like asking in
22 the past have you owned more than one car.

23 MR. TOPIC: Perfectly legitimate
24 question.

1 MR. MINE: You can answer if you
2 understand it, but it is vague.

3 THE WITNESS: I'm not aware. I'm not
4 sure.

5 BY MR. TOPIC:

6 Q. So in January 2015 do you know whether
7 CPD owned more than one cell site simulator?

8 A. During that period of time I
9 understood one.

10 Q. When you say you understood one, what
11 do you mean you understood of?

12 A. We were in possession of one.

13 Q. So it is your understanding that in
14 January of 2015 Chicago Police Department was
15 not in possession -- let me ask it.

16 In January of 2015, how many cell
17 site simulator systems did Chicago Police
18 Department have possession of?

19 MR. MINE: Objection, asked and
20 answered. You can answer again.

21 THE WITNESS: My understanding during
22 that period, if I said to you, asked about who
23 it was in the possession of, of Harris Corp.,
24 out to be retrofitted or upgrades.

1 BY MR. TOPIC:

2 Q. How did you come to that
3 understanding?

4 A. The device was not kept where it was
5 kept at, stored at. Asking my supervisor, my
6 supervisor advised me it was in the possession
7 of Harris, being upgraded.

8 Q. You don't have any firsthand knowledge
9 about where Chicago Police Department's cell
10 site stimulator was located in January of 2015,
11 correct?

12 MR. MINE: Objection, argumentative.
13 You can answer.

14 THE WITNESS: No. My understanding it
15 was out to be retrofitted and upgraded.

16 BY MR. TOPIC:

17 Q. And other than what someone told you,
18 do you have any firsthand knowledge of whether
19 Chicago Police had possession of a cell site
20 simulator in January of 2015?

21 A. Where the equipment was stored, it was
22 not there anymore and it was never -- this is
23 where it was kept at. It wasn't taken out of
24 the other vehicle. It wasn't taken out of any

1 other location. It was kept there.

2 Q. Okay. What is the location you are
3 referencing in your last answer?

4 A. It is kept in a vehicle, a designated
5 vehicle.

6 Q. Where is the vehicle kept?

7 A. At Homan Square.

8 Q. What is the car number?

9 A. I don't recall.

10 Q. How would you describe the car?

11 A. Black SUV.

12 Q. Do you know anything about the license
13 plate?

14 A. No.

15 Q. Is it an M plate?

16 A. I can't recall.

17 Q. Do you know the make and model?

18 A. A Ford.

19 Q. Black Ford SUV?

20 A. Yes.

21 Q. Okay. And that is the vehicle -- what
22 was the timeframe you had in mind when you gave
23 the answer about the cell site simulator being
24 kept in that vehicle, from when to when?

1 A. Could you be more specific?

2 MR. MINE: Objection, vague.

3 BY MR. TOPIC:

4 Q. Sure. I just want to -- when you
5 answered as to where CPD's cell site simulator
6 was kept, was that specific to January 2015 or
7 is that today or both or something else?

8 A. It wasn't kept -- January of 2015 it
9 wasn't in the vehicle.

10 Q. Okay. When was it removed from the
11 vehicle that you referenced in your last
12 answer?

13 A. I don't -- I don't know.

14 Q. Okay. So I'm not ever asking you to
15 speculate.

16 Okay. So if he says to you if
17 you know, that's -- you don't need to listen to
18 that, okay, just so that's clear.

19 A. The answer is I don't know.

20 Q. You don't know. Okay.

21 So you don't -- at some point
22 prior to January of 2015 there was a cell site
23 simulator system in a black Ford SUV at Homan
24 Square, is that correct?

1 A. Yes.

2 Q. And at some point in time it is your
3 understanding that a cell site simulator system
4 was removed from that vehicle, is that correct?

5 A. Yes.

6 Q. And you don't know when it was
7 removed, correct?

8 A. Correct.

9 Q. You don't know who removed it,
10 correct?

11 A. Yes, I don't know.

12 Q. You don't know why they removed it,
13 correct?

14 A. To my understanding it was removed to
15 be sent back for upgrades.

16 Q. And that understanding is from what
17 another officer told you, is that correct?

18 A. My supervisor.

19 Q. Who was that?

20 A. Jack Costa, C O S T A.

21 Q. And Jack Costa told you that the cell
22 site simulator system was removed from the
23 vehicle and sent to Harris, is that correct?

24 A. Yes.

1 Q. Do you know when that was?

2 MR. MINE: Objection. When he was told
3 or when it was removed?

4 BY MR. TOPIC:

5 Q. Do you recall when Jack Costa told you
6 that the cell site simulator system was
7 removed?

8 A. It would have been sometime in
9 January.

10 Q. How did you come to that conclusion?

11 A. Noticing that it was not in the
12 vehicle anymore. Just under the assumption of
13 where it would be.

14 Q. So is it correct no one told you it
15 was being removed before it was removed,
16 correct?

17 A. I was not there. I was during that
18 period, I was on vacation, I was off.

19 Q. What was that time period you were on
20 vacation?

21 A. Early December to early January.

22 Q. So at some point after you returned in
23 early January, am I correct you noticed the
24 cell site simulator wasn't in the car and you

1 asked and Mr. Costa explained it was sent to
2 Harris, is that correct?

3 A. Yes.

4 Q. Did Mr. Costa say why it was sent to
5 Harris?

6 MR. MINE: Objection, asked and
7 answered. You can answer again.

8 THE WITNESS: For upgrades.

9 BY MR. TOPIC:

10 Q. What were those upgrades?

11 A. I don't know.

12 Q. Do you know who would know the answer
13 to that question?

14 A. I'm not sure.

15 Q. Let me ask you some questions about,
16 not just -- let me ask a question.

17 When I use the term "cell site
18 simulator", what does that mean to you?

19 Let me withdraw that.

20 I will hand you the declaration
21 you provided in this case. Let's work from
22 there.

23 (Deposition Exhibit No. 1 was
24 marked for identification.)

1 BY MR. TOPIC:

2 Q. Do you recognize Exhibit 1 I just
3 handed down to you?

4 A. Yes.

5 Q. Is this a declaration that you signed?

6 A. Yes.

7 Q. Who wrote the declaration?

8 A. I wrote this.

9 Q. You typed it?

10 MR. MINE: Objection, argumentative.

11 BY MR. TOPIC:

12 Q. Did you type it? I just want to make
13 sure we are on the same page by what we mean by
14 wrote.

15 Did you draft all of these words?

16 MR. MINE: Object and direct the
17 witness not to answer to the extent it involves
18 communications with attorneys.

19 BY MR. TOPIC:

20 Q. If the attorneys drafted it you can
21 say that and we won't go any further.

22 MR. MINE: Object, if you know.

23 BY MR. TOPIC:

24 Q. If you don't know who drafted it you

1 can tell me that, too.

2 A. I relayed this information to Sergeant
3 Fidducca and I don't know who wrote it.

4 Q. And then did someone present you a
5 draft to sign?

6 A. Yes.

7 Q. Do you recall whether you made any
8 edits to the draft?

9 A. I don't recall.

10 Q. Do you recall any questions about the
11 draft?

12 A. I don't recall.

13 Q. Did you send or receive any e-mails
14 about this declaration?

15 A. Not that I recall.

16 Q. Did anyone ever ask you to look for
17 any document related to the subject matter of
18 this lawsuit?

19 A. Not that I recall.

20 Q. Do you know whether you have any
21 e-mails about the cell site simulator being
22 sent for upgrades in around January of 2015?

23 A. I don't recall.

24 Q. It is possible that you do?

1 A. I don't remember any e-mails being
2 sent.

3 Q. Okay. Let me call your attention to
4 Paragraph Number 3.

5 You used the term or the phrase
6 "the system known as a cell site simulator",
7 what did you mean by the system known as a cell
8 site simulator?

9 A. That's what it is called and that's
10 what we refer to it as.

11 Q. You refer to it as a cell site
12 simulator?

13 A. It has been mentioned before -- it has
14 been -- it has been identified as that before.

15 Q. Are there any other names you use to
16 identify the cell site simulator?

17 A. I don't recall. No, I don't recall.

18 Q. Have you ever been involved in any
19 applications to obtain Court orders to use the
20 cell site simulator?

21 A. No.

22 Q. You say in paragraph 3 of the
23 declaration, the system includes both hardware
24 and associated software, correct?

1 **A. Yes.**

2 **Q. Let's, I want to talk about the system**
3 **that you had, that CPD had, that it sent to**
4 **Harris in late 2014, early 2015, that system.**
5 **Okay.**

6 **Is that the same system that CPD**
7 **currently has?**

8 MR. MINE: Object to the form, vague
9 and argumentative to the extent that it has
10 been upgraded, it is somewhat different. So I
11 don't know what you mean by same. You mean the
12 same generally?

13 BY MR. TOPIC:

14 **Q. Did you understand the question?**

15 MR. MINE: Again I object, it is vague
16 and argumentative.

17 BY MR. TOPIC:

18 **Q. Could we have the question read back?**

19 **(Question read.)**

20 MR. MINE: Same objection, vague and
21 argumentative as to same.

22 BY MR. TOPIC:

23 **Q. Okay. We will go through them.**

24 **The timeframe I have in mind is**

1 right before the system was allegedly sent to
2 Harris in late 2014, early 2015, that will be
3 the timeframe I have in mind.

4 Can you list for me first all of
5 the hardware components of that cell site
6 simulator system?

7 MR. MINE: Object, you can answer
8 generally, but I would direct you not to answer
9 to the extent that you know details that would
10 violate your non-disclosure agreement with the
11 FBI.

12 MR. TOPIC: Well, we are going to have
13 an issue with that.

14 MR. MINE: I'm sure you will. I'm
15 just making the objection.

16 BY MR. TOPIC:

17 Q. Well, you briefly talk about hardware
18 in your declaration, and I would like to know
19 from late 2014, the system that was sent to
20 Harris, what were all of the hardware
21 components?

22 MR. MINE: Same objection.

23 BY MR. TOPIC:

24 Q. Why don't you first list for me any

1 that there is not going to be any dispute about
2 and if there is more components you tell me
3 some contract prohibits you from giving
4 testimony in a Court case.

5 Why don't we start with any
6 hardware components you can disclose to me?

7 A. The system is a -- your question again
8 was from December?

9 Q. Let's get the context.

10 So I'm talking about cell site
11 simulator system as it existed just before it
12 was sent to Harris in late 2014?

13 A. I can't comment on that, I wasn't
14 there during December as to what was sent out.

15 Q. Okay. Prior to the time you learned
16 that the cell site simulator had been sent to
17 Harris, when is the last time you recall seeing
18 the system?

19 A. I'm not sure. I can't put a date on
20 that. I'm not sure.

21 Q. Okay. So without putting a date on it,
22 I'm going to ask you questions about whatever
23 your last recollection is of what components
24 were in the system before it was sent to

1 Harris, doesn't matter to me when that is, but
2 that's the system I want you to have in my
3 immediate --

4 That system, can you tell me what
5 the components were?

6 A. Not giving a date, because I don't
7 know the last time I saw it in this vehicle,
8 looks like stereo equipment more or less.

9 Q. Is it one piece of hardware?

10 A. It is multiple pieces.

11 Q. Okay. Could you list pieces for me?

12 MR. MINE: Again, you can answer
13 generally, but don't answer to the extent it
14 would violate your non-disclosure agreement.
15 If you recollect.

16 THE WITNESS: And I feel that it
17 would, so -- multiple pieces of electronic
18 equipment.

19 BY MR. TOPIC:

20 Q. Okay. So -- just so we have a clean
21 record. Can you please identify more me what
22 all of those individual components are?

23 MR. MINE: Same objection. You can
24 answer generally, but don't disclose what you

1 think would violate your non-disclosure
2 agreement.

3 THE WITNESS: Multiple pieces of
4 equipment that are used.

5 BY MR. TOPIC:

6 Q. You are not going to identify any of
7 the pieces for me?

8 A. I don't know the names of the -- if
9 that's what you are looking for, names of these
10 boxes that I've described to you, no, I don't
11 know the names of them.

12 Q. Okay. So there is more than one, I
13 think you use the word "box", right?

14 A. Each one has to work in conjunction
15 for this device to work properly.

16 Q. There are multiple hardware components
17 that comprise the cell site simulator system?

18 A. Yes.

19 Q. Okay. Can you identify -- you said
20 you can't identify any of them by their
21 specific --

22 A. To be honest, I don't -- off of the
23 top I could not recall what they are named.
24 Even -- I haven't seen them in -- I don't know

1 when is the last time I've noticed them. I
2 can't name them.

3 Q. Can you describe them by their general
4 function? For example, is there an antenna?

5 MR. MINE: Same objection. You can
6 answer generally, but don't disclose the
7 details if they violate your NDA.

8 THE WITNESS: When these devices are
9 used in conjunction the system should work
10 properly.

11 BY MR. TOPIC:

12 Q. I appreciate that.

13 My question is, you said you
14 don't know the specific names of the
15 components, and what I'm looking for is
16 whatever level of description you can provide.

17 A. I believe I gave you the level that I
18 feel like I can provide.

19 Q. And when you say "could provide", do
20 you mean you otherwise don't know the answer or
21 you know the answer but you won't provide it
22 because you believe the non-disclosure
23 agreement prevents you from doing so?

24 A. I believe the non-disclosure.

1 Q. But for the non-disclosure agreement
2 would you be able to answer my question?

3 MR. MINE: Objection. What question is
4 that?

5 BY MR. TOPIC:

6 Q. Are you able to generally describe the
7 components of the cell site simulator system
8 but for the non-disclosure?

9 A. I believe I described it.

10 MR. MINE: He described it generally.

11 THE WITNESS: I believe I did.

12 BY MR. TOPIC:

13 Q. Again is there a greater level of
14 specificity as to each individual component
15 that you are capable of providing?

16 A. My knowledge was what I described to
17 you.

18 Q. Okay. So you don't have any
19 additional knowledge about what any of the
20 specific components of the cell site simulator
21 system do, is that correct?

22 A. Again I do not have the specifics on
23 what this equipment is able to do.

24 Q. My question was whether you had any

1 additional knowledge about what any of the
2 components do?

3 A. I answered your question on what I
4 believe my knowledge is on it.

5 Q. Well, you will have to forgive me but
6 our answer is not clear.

7 I don't -- it is unclear to me
8 whether you have additional knowledge about
9 what any of the components do or not, do you or
10 do you not?

11 MR. MINE: Object to the form as
12 vague.

13 BY MR. TOPIC:

14 Q. Are you able to provide any more
15 explanation about what any of the components
16 are?

17 A. No.

18 Q. Is that because you don't know or
19 because of the non-disclosure agreement?

20 A. Both.

21 Q. Okay. So you would be able to answer
22 the question but for the non-disclosure
23 agreement, correct?

24 MR. MINE: Objection, argumentative. I

1 don't think he said that.

2 THE WITNESS: My understanding of the
3 equipment is what I've given you already and
4 that's -- that would be my answer.

5 BY MR. TOPIC:

6 Q. I understand. But I am trying to
7 get -- before we go down a path where we go to
8 the Court and everybody shows up, and we have
9 an argument about the relevance of this
10 non-disclosure agreement, I want to get a sense
11 of whether that's a waste of everybody's time.

12 If there is nothing more you
13 know, then it is a waste of everybody's time.

14 But if there is more that you
15 know then it isn't. So I'm trying to
16 understand.

17 Let me just back up and ask a
18 different question.

19 How many components were there in
20 CPD's cell site simulator system the last time
21 you were aware of it before it was sent to
22 Harris in late 2014?

23 A. I'm not sure of the number.

24 Q. Do you know whether it was more than

1 one component?

2 A. That would make up the whole system?

3 Q. Correct.

4 A. Yes.

5 Q. Do you know whether it was more than
6 two components that would make up the cell site
7 simulator?

8 A. Yes. But after that I don't know the
9 exact number of it.

10 Q. So am I correct before the system was
11 sent to Harris in late 2014, there were three
12 or more components to the system?

13 A. I'm sorry. Before what? Before you
14 said.

15 Q. Again the timeframe I'm talking about
16 is before the cell site simulator system was --

17 A. Again, I don't know it was sent back
18 because I was not there in December, so I don't
19 know how many components were sent back.

20 Q. Okay. Right.

21 A. All I can answer is when looking into
22 this vehicle there was nothing there.

23 Q. Right. So the last time you saw the
24 system, am I correct, that it comprised at

1 least three hardware components?

2 A. Yes.

3 Q. And you don't know -- you don't know
4 if it was 3 or 4 or 5 or some other number, is
5 that correct?

6 A. Exactly.

7 Q. Is there some number that you can tell
8 me I know it is not any more than this number?

9 A. No.

10 Q. Okay. And again I'm not -- my question
11 isn't whether you are limited by the
12 non-disclosure agreement, my question is just
13 what you are able to answer but for the
14 non-disclosure agreement.

15 The component that is the largest
16 in size, would you be able to provide any
17 description about what it is?

18 MR. MINE: Objection, argumentative as
19 to whether one is discernibly larger in size.
20 You can answer if there is one that is
21 discernibly larger in size.

22 BY MR. TOPIC:

23 Q. I'm trying to get -- I want to go
24 through them. I don't have anything to go on.

1 Pick in your own mind whatever first one you
2 want to as to that first component, whichever
3 one -- I will start a new question.

4 Are the components different
5 sizes?

6 A. Yes.

7 Q. Are any two components the same size?

8 A. I don't have exact measurements on
9 that. I don't know.

10 Q. Okay. In your own mind can you
11 picture one of the components as being the
12 largest?

13 A. Yes.

14 Q. And do you know the name of that
15 component?

16 A. No.

17 Q. Do you -- have you ever referred to
18 that component when speaking with someone else?

19 A. I don't recall.

20 Q. Would you be able to provide a
21 description at some level about what that
22 component does?

23 A. The description of it, but not what
24 it -- the schematics of it, no, not what it

1 actually does.

2 Q. Okay. So there is some information
3 you could provide about that component,
4 correct?

5 A. What it looks like, a description.

6 Q. Okay. So you could describe what it
7 physically looks like, correct?

8 A. Yes.

9 Q. And are you able to provide any
10 description about what it does?

11 A. I don't recall.

12 Q. You don't -- sitting here you don't
13 recall what that component does?

14 A. Exactly.

15 Q. And was there a point in time when you
16 think you did know what that component does?

17 MR. MINE: Objection to the extent
18 that calls for speculation about your prior
19 mental state. You can answer, if you recall.

20 MR. TOPIC: Most people would call that
21 memory.

22 MR. MINE: Well, it is kind of hard to
23 speculate about if you remember where you got
24 it.

1 MR. TOPIC: Yes. Especially if --

2 THE WITNESS: I don't recall.

3 BY MR. TOPIC:

4 Q. How about any of the other hardware
5 components, is your answer any different?

6 A. It is the same.

7 Q. How did the hardware units work,
8 together, in unison?

9 MR. MINE: You can answer generally,
10 but don't disclose specific technical details
11 that would violate the non-disclosure
12 agreement.

13 BY MR. TOPIC:

14 Q. Let me ask, do you have any specific
15 technical details that disclosing them would in
16 your mind violate the non-disclosure agreement?

17 A. Yes.

18 Q. Okay. And you will not provide those
19 to me, is that correct?

20 A. At this moment I don't recall what
21 those are, I don't recall what it would be to
22 operate that system.

23 Q. Is there a document or a series of
24 documents that you believe might refresh your

1 memory about what the components are and how
2 they would work together?

3 A. Possibly.

4 Q. Okay. And how would you describe
5 whether there was such a document?

6 A. I wouldn't know that, I guess, so it
7 would have to be something -- Harris would have
8 to provide something like that.

9 Q. Have you ever seen documents like
10 that?

11 MR. MINE: Objection, vague and
12 argumentative. You are asking ever seen any
13 documents --

14 MR. TOPIC: You can stop at vague and
15 argumentative. There is nothing more that you
16 need to say.

17 MR. MINE: Well, the problem is your
18 question has problems.

19 MR. TOPIC: No, stop.

20 MR. MINE: I'm trying to help you out.
21 Trying to figure out which ones are the biggest
22 problems.

23 MR. TOPIC: I appreciate that, but I'm
24 going to ask you to stop providing --

1 MR. MINE: Go ahead. Ask another
2 question.

3 MR. TOPIC: You can just object to the
4 question, and I can deal with it.

5 MR. MINE: Go ahead.

6 MR. TOPIC: Could I have the last
7 question read back? I don't recall it.

8 (Question read.)

9 Q. Have you ever seen -- I will ask you
10 the question.

11 Have you ever seen any documents
12 describing how the cell site simulator
13 components work together in unison?

14 A. I don't recall.

15 Q. As of January of 2015, did CPD have
16 any additional cell site simulator components
17 that were not located in the black SUV that you
18 referenced?

19 A. Not to my knowledge.

20 Q. So you don't know whether there were
21 or were not additional components?

22 A. Not to my knowledge.

23 Q. As far as you know it is possible that
24 there were additional cell site simulator

1 components possessed by CPD in January of 2015
2 other than the ones that had been in the black
3 SUV, correct?

4 A. No.

5 Q. That's not correct?

6 A. No.

7 Q. So you know that there were no other
8 components in January of 2015, other than
9 the --

10 A. To the best of my knowledge the Harris
11 equipment was taken out and sent back to
12 Florida for upgrades.

13 Q. What do you mean by the Harris
14 equipment in your last answer?

15 A. It states here. Right here. From
16 Harris Corporation. (Indicating.)

17 Q. When you use the term "Harris
18 equipment", do you mean that would be
19 synonymous with the cell site simulator system
20 you are describing in your declaration?

21 A. You also brought up Harris, so I'm
22 using that as a reference of where this
23 equipment went to.

24 Q. Okay. And my question was, do you

1 know whether CPD had any other cell site
2 simulator components in its possession in
3 January of 2015?

4 A. We did not possess a working or any
5 active -- any working equipment that you refer
6 to as a cell site simulator.

7 Q. Okay. So you impose the limitation of
8 working in your answer.

9 Did CPD have any non-working cell
10 site simulator components in its possession in
11 January of 2015?

12 A. I don't recall.

13 Q. So to the best of your knowledge it is
14 possible that in January of 2015 CPD had what
15 you described as non-working cell site
16 simulator components, correct?

17 A. As of January 2015 we did not possess
18 any working cell site simulators.

19 Q. So in January of 2015 you did possess
20 non-working sell site simulators, correct?

21 MR. MINE: Objection, I think he said
22 he didn't recall. You can answer again.

23 THE WITNESS: I don't recall.
24

1 BY MR. TOPIC:

2 Q. Did you and Mr. Mine have any
3 discussions in preparing for this deposition
4 today?

5 MR. MINE: You can answer that
6 question, but can't disclose what we talked
7 about.

8 THE WITNESS: Yes.

9 BY MR. TOPIC:

10 Q. Did Mr. Mine make any comments to you
11 about when he made objections what you should
12 do?

13 MR. MINE: Objection, I direct you not
14 to answer what we discussed.

15 BY MR. TOPIC:

16 Q. Are you going to decline to answer?

17 A. Yes.

18 Q. Would you be able to answer it?

19 MR. MINE: Again I direct you not to
20 answer that.

21 BY MR. TOPIC:

22 Q. I'm just asking whether you would be
23 able to. If you don't know you can tell me you
24 don't know.

1 A. No.

2 Q. So in January of 2015 you cannot tell
3 me definitely whether Chicago Police Department
4 had any non-working cell site simulator
5 components, is that correct?

6 MR. MINE: Objection, vague as to
7 definitive.

8 MR. TOPIC: Again objection vague
9 would be fine.

10 THE WITNESS: I think as I stated I
11 don't recall.

12 BY MR TOPIC:

13 Q. You don't recall whether you know or
14 you don't know?

15 A. As of January 2015, I believe that was
16 the date, the only cell site simulator that we
17 had was in not working condition, in the
18 possession of, I believe you refer to it as,
19 Harris Corp.

20 Q. So in January of 2015 CPD did not have
21 any cell site simulator components in its
22 possession, is that correct?

23 MR. MINE: Objection, I think he has
24 already answered that.

1 BY MR TOPIC:

2 Q. You can answer.

3 A. As of January of 2015 the cell site
4 simulator we are speaking of was in non-working
5 condition.

6 Q. Who had possession of the cell site
7 simulator in January of 2015, the one you
8 reference in your last answer?

9 MR. MINE: That's been asked and
10 answered about ten times.

11 THE WITNESS: My understanding it was
12 out to be upgraded or retrofitted or whatever.

13 BY MR TOPIC:

14 Q. So other than -- let's set that system
15 aside.

16 Okay. There is the system that
17 you were told was sent to Harris in and around
18 January of 2015.

19 Did Chicago Police Department in
20 January of 2015 have in its possession any cell
21 site simulator components?

22 A. Not to my knowledge.

23 Q. If you wanted to know whether Chicago
24 Police Department had any cell site simulator

1 components in its possession in January of
2 2015, how would you go about answering that
3 question?

4 A. I don't know how to answer that
5 question.

6 Q. Is there any documentation that's kept
7 when Chicago Police Department acquires or
8 disposes of a cell site simulator component?

9 A. I'm not aware of that.

10 Q. Do you know whether any cell site
11 simulator components in and around January of
12 2015 were stored somewhere else when they
13 weren't being used?

14 A. I'm not aware of that.

15 Q. Do you know when Chicago Police
16 Department first acquired any cell site
17 simulator components?

18 A. No, I don't.

19 Q. And you have been in your position
20 since approximately 2002, is that correct?

21 A. Yes, I don't know the exact date, but
22 2002, 2003.

23 Q. And do you recall whether CPD already
24 had a cell site simulator system when you

1 started in your position in 2002?

2 A. I don't recall.

3 Q. Did you ever receive any training
4 about cell site simulators?

5 A. Yes.

6 Q. And was it on more than one occasion?

7 A. I don't recall.

8 Q. What could you describe for me about
9 the training you received related to sell site
10 simulators?

11 MR. MINE: I'm going to object. You
12 can answer generally, but I direct you not to
13 answer as to details that would violate the
14 non-disclosure as to specific functionalities.

15 THE WITNESS: I don't recall the
16 training.

17 BY MR. TOPIC:

18 Q. Do you recall whether it was training
19 about how to operate the cell site simulator?

20 A. I believe so.

21 Q. Have you ever operated a cell site
22 simulator?

23 A. I don't recall.

24 Q. Were you ever present in the black SUV

1 you described when the cell site simulator was
2 outside of Homan Square?

3 A. I don't recall.

4 MR. MINE: Before you go on the
5 record, we are having the same problem we had
6 in Mr. Thayer's case where there are people
7 talking loudly, and your court reporter keeps
8 looking behind her and I think maybe
9 distracted. Is it possible to have your
10 colleagues not talking that loudly on the
11 conference call so as to not harassing the
12 transcript is the question?

13 MR. TOPIC: I'm sure Carol will tell
14 me if it is a problem.

15 Q. Is it a distraction to you, sir?

16 MR. MINE: I find it distracting.

17 BY MR. TOPIC:

18 Q. Is it a distraction to you?

19 THE WITNESS: My counsel.

20 MR. MINE: I ask as a basic
21 professional matter, since you don't seem to
22 have any insulation in your walls, that you try
23 to have the conference free of extraneous
24 noise.

1 MR. TOPIC: Why don't we take a break
2 and accommodate your request.

3 Is there anything else about the
4 accommodations that's problematic here?

5 MR. MINE: I actually like it, it is
6 very nice.

7 MR. TOPIC: Okay. So other than that
8 there is nothing else.

9 MR. MINE: Well, if a dog wanders in, I
10 might complain about that, but I think the dog
11 is under control this time.

12 Do you want to take a break now?

13 MR. TOPIC: Off the record.

14 (Recess.)

15

16 BY MR. TOPIC:

17 **Q. You talked about the cell site**
18 **simulator being kept in a black SUV, are you**
19 **aware of any times where that system was moved**
20 **out of that vehicle?**

21 MR. MINE: Other than the one he has
22 just talked about.

23 BY MR TOPIC:

24 **Q. You can answer.**

1 A. I don't recall.

2 Q. You can't say that the cell site
3 simulator system has not ever been removed from
4 the black SUV, other than the time it was sent
5 to Harris for upgrades, right?

6 A. This vehicle has the electronics like
7 a heavy duty electrical system for this
8 equipment specific.

9 Q. So, I'm sorry, are you aware of
10 whether it has ever been moved to another
11 vehicle, for example?

12 A. I don't recall.

13 Q. Your declaration also talks about
14 software components?

15 A. Yes.

16 Q. And paragraph 3 talks about associated
17 software? Do you see that?

18 A. Yes.

19 Q. Could you please describe for me the
20 associated software that's referenced in
21 paragraph 3 of your declaration?

22 MR. MINE: You can answer generally,
23 but I direct you not to answer if you know or
24 recollect any details that would violate the

1 non-disclosure agreement as to software.

2 THE WITNESS: Would you be more
3 specific on the software, the issue of.

4 BY MR TOPIC:

5 Q. What is the associated software
6 referenced in paragraph 3 of your declaration?

7 MR. MINE: Same objection. You can
8 answer generally, if you know. I direct you not
9 to answer any details that you recall if it
10 violates the non-disclosure agreement.

11 THE WITNESS: I believe the software
12 is used to operate the system.

13 BY MR TOPIC:

14 Q. Do you know the names of the software?

15 A. I don't recall.

16 Q. Are there functional descriptions of
17 the software that you are aware of?

18 A. I don't recall.

19 Q. So when you signed this declaration,
20 was there any understanding you had in your own
21 mind what software was included within
22 associated software?

23 A. I don't know the specifics on the
24 software. I don't recall that.

1 **Q. Are you able to describe for me what**
2 **the capabilities of the system are?**

3 MR. MINE: Objection, vague as to
4 capabilities. You can answer that question yes
5 or no, but I direct you not to answer any
6 specific capabilities that would violate
7 non-disclosure.

8 THE WITNESS: I'm sorry. Could you --
9 BY MR TOPIC:

10 **Q. What are the capabilities of the cell**
11 **site simulator system that was -- let me be**
12 **more precise.**

13 **Let's talk about the system as it**
14 **existed before it was sent to Harris in late**
15 **2014.**

16 **What were the capabilities of**
17 **that system before it was sent to Harris?**

18 MR. MINE: Same objection vague. And
19 also I direct the witness not to answer as to
20 the detailed technical capabilities. You can
21 answer generally.

22 THE WITNESS: If I answer that I would
23 violate the disclosure.

24

1 BY MR TOPIC:

2 Q. How are you coming to that conclusion?

3 A. Discussion of the operation of the
4 equipment or the capabilities of the equipment.

5 Q. What is your understanding of the
6 limitations that this non-disclosure agreement
7 imposes on you that's relevant to the questions
8 I'm asking you?

9 A. Confidentiality.

10 Q. Confidentiality as to what
11 specifically?

12 A. What was described with the disclosure
13 with the FBI.

14 Q. What is the disclosure of the FBI that
15 you just referenced? Do you mean the
16 non-disclosure agreement?

17 A. I'm sorry.

18 Q. This is what I am trying to get at.

19 So you -- there is testimony that
20 you are declining to provide, based on this
21 non-disclosure agreement, and what I am asking
22 you is for your understanding of what is the
23 scope of the restriction in that agreement
24 that's leading to the conclusion that you can't

1 provide the testimony?

2 A. Functionality of this equipment.

3 Q. So it is -- is there anything about
4 the functionality of the equipment in any level
5 of generality that you believe you can provide
6 without violating the non-disclosure agreement?

7 A. No.

8 Q. Okay. So, for example, could you tell
9 me whether the system was capable of acquiring
10 subscriber ID numbers from cell phones? Are
11 you able to answer that question?

12 A. No.

13 Q. Let's move away from the
14 functionality. And I'm just going to ask you
15 about the kinds of uses to which the equipment
16 has been put.

17 Can you describe to me what type
18 of operations the cell site simulator is used
19 for?

20 MR. MINE: You can answer generally
21 specifics that would not violate the
22 disclosure.

23 THE WITNESS: I don't recall the
24 operations. I feel though if I did recall that

1 that that would be a violation of cases that
2 individuals worked on in the past pertaining to
3 this equipment.

4 BY MR TOPIC:

5 Q. What do you mean by a violation of
6 cases people have worked on in the past?

7 A. I don't recall any cases I've worked
8 on with this equipment.

9 Q. Okay. Let's remove from it a case
10 that you specifically worked on and just say in
11 general, do you have any understanding of the
12 type of cases in which sell site simulators
13 were used or operations?

14 A. I can't comment on that if it was used
15 in any other cases or what cases.

16 Q. And you can't comment because of the
17 non-disclosure agreement?

18 A. I don't have knowledge of that. I
19 don't have knowledge of that.

20 Q. Do you know whether cell site
21 simulators have ever been used by CPD to locate
22 a missing person?

23 A. I don't recall.

24 Q. Do you know whether cell site

1 simulators have ever been used to locate
2 violent criminals?

3 A. Yes, I have.

4 Q. Okay. And can you tell me with what
5 level of frequency?

6 A. I don't have that knowledge.

7 Q. Is there any specific instance,
8 without you telling me what it is, are there
9 any specific instances you have in mind in
10 which cell site simulators were used to locate
11 violent criminals?

12 A. I don't recall.

13 Q. And during the time period of
14 approximately late January 2014 until the
15 system was returned from Harris, your
16 understanding is that CPD was unable to use any
17 cell site simulators during that time?

18 MR. MINE: Just object, you said late
19 January 2014?

20 BY MR TOPIC:

21 Q. I'm sorry. Thank you. Let me back up,
22 otherwise we will have to do this again.

23 There is a time period where your
24 understanding this cell site simulator system

1 was at Harris for an upgrade, is that right?

2 A. Yes.

3 Q. And that was approximately late 2014
4 until approximately sometime in 2015, is that
5 right?

6 A. My understanding.

7 Q. Okay. We will just refer to that as
8 the time in which -- late 2014 when the system
9 was out for programing, is that fair? Does
10 that work?

11 A. Yes.

12 Q. Okay. During the time, beginning in
13 late 2014 when the CPD's cell site simulator
14 was at Harris, was CPD unable to conduct any
15 operations using a cell site simulator?

16 A. That was my understanding.

17 Q. Has CPD ever been loaned a cell site
18 simulator from someone else?

19 A. Not to my understanding.

20 Q. Has CPD ever participated in an
21 operation in which another law enforcement
22 agency was deploying a cell site simulator?

23 A. Not that I recall.

24 Q. Who do you think would be the most

1 knowledgeable person at CPD about whether CPD
2 was ever owned a cell site stimulator?

3 MR. MINE: Objection, to the extent it
4 calls for speculation. You can answer if you
5 have some understanding of who would be the
6 most knowledgeable person.

7 THE WITNESS: All I can testify is on
8 my behalf, and I wouldn't know who that would
9 be. I wouldn't have any knowledge of that.

10 BY MR TOPIC:

11 Q. Have you ever had questions about cell
12 site simulators in the course of your job?

13 MR. MINE: Objection, vague.

14 THE WITNESS: I don't recall.

15 BY MR TOPIC:

16 Q. Okay. And your supervisor was who in
17 late January -- I'm sorry. -- late 2014 into
18 2015? Is that Costa?

19 A. Yes, Jack Costa.

20 Q. If someone in the Chicago Police
21 Department wants to deploy a cell site
22 simulator, what is the process for doing so?

23 A. That would be something you would have
24 to discuss with a supervisor. I have no

1 knowledge of that -- how to -- that procedure.

2 Q. Is there a limited number of CPD
3 officers who are allowed to access the cell
4 site simulator?

5 A. Yes.

6 Q. And what is your best understanding of
7 the approximate number of such officers?

8 A. Off of the top of my head I don't know
9 the exact number, because during that period
10 people might have retired and left, so I don't
11 know the exact number.

12 Q. You do you think that number is more
13 or less than 10 people?

14 MR. MINE: Object to form, vague. 10
15 at a given point in time, or over a period of
16 time?

17 MR. TOPIC: At any specific point in
18 time.

19 THE WITNESS: That could be a good
20 number. But again I don't know the exact
21 number.

22 BY MR TOPIC:

23 Q. Sure. Understood. So approximately 10
24 people would be your best estimation.

1 At any given time how many people
2 would have -- could have access to a cell site
3 simulator?

4 A. Is there a period of time there?
5 When?

6 Q. Why don't we go with January of 2015,
7 approximately how many officers had access to
8 the cell site simulator?

9 A. Had access would be whoever was
10 assigned during that period to the tech lab.

11 Q. Were any people outside of the tech
12 lab -- let me -- in January of 2015, were there
13 any people outside of the tech lab who had
14 access to the cell site simulator?

15 A. No.

16 Q. And approximately how many people
17 worked in the tech lab in January of 2015?

18 A. That year it was the number 10 I said
19 earlier.

20 Q. So approximately 10 people worked in
21 the tech lab in January of 2015, is that right?

22 A. Approximately, yes. Correct.

23 Q. Okay. And were there any people
24 employed in the tech lab who didn't have access

1 to the cell site simulator?

2 A. No.

3 Q. Where were the keys to that SUV that
4 had the cell site simulator in it? Where were
5 those kept, the last time you are aware of
6 before the system was sent to Harris?

7 A. In a lock box, key lock box.

8 Q. And who controlled that lock box?

9 A. We had -- if you were assigned to the
10 tech lab you had access to those keys.

11 Q. So all of the people in the tech lab
12 had access to the keys, the lock box that had
13 the keys to the SUV, is that right?

14 A. Yes.

15 Q. Any time the black SUV was being
16 accessed, is there a record that's kept of
17 that?

18 A. Not that I'm aware of.

19 Q. And if the black SUV with the cell
20 site simulator in it was taken out into the
21 field, is there a record that would be created
22 of that?

23 A. Not that I'm aware of.

24 Q. Are there any security cameras -- let

1 me go back to the time period of late 2014 into
2 January of 2015, were there any security
3 cameras in the area in which the black SUV with
4 the cell site simulator was kept?

5 A. Not that I'm aware of.

6 Q. Am I correct that if a cell site
7 simulator was going to be deployed, would there
8 be a request that would originate outside of
9 the tech lab and then sent to the tech lab?

10 A. Yes.

11 Q. Is there a procedure for request to
12 deploy a cell site simulator at CPD?

13 A. Not that I'm aware of.

14 Q. And just generally, when I use the
15 term "procedure", does that have a specific
16 meaning to you or would that include general
17 orders, specific orders, directives, any type
18 of document like that?

19 MR. MINE: Object to form. Are you
20 asking what you have in your mind or what he
21 understands?

22 MR. TOPIC: No, I'm asking his
23 understanding.

24 THE WITNESS: There are no general

1 procedures that I'm aware of.

2 BY MR. TOPIC:

3 Q. Let me do a little definitional.

4 When I use the term "procedure",
5 I'm intending a broad meaning of that, whether
6 it is a General Order, specific order,
7 directive, an e-mail, anything that would
8 govern the process, is that -- is that clear?

9 Do you understand what I am
10 getting at?

11 A. Yes, but I'm unaware of that, again I
12 probably need to backtrack on that question, of
13 any general procedure.

14 Q. Understood. Yes. I wanted to make sure
15 that when I say "procedure", you are not
16 excluding well there is a general order but
17 technically that's not a procedure, that is the
18 scenario I am trying to deploy, is that clear?

19 A. Best of my knowledge there is none.

20 Q. Okay. So to the best of your
21 knowledge there is no procedure for requesting
22 the deployment of the cell site simulator?

23 A. Yes.

24 Q. To the best of your knowledge is there

1 any records that are created when a request to
2 deploy a cell side simulator is made?

3 A. I'm not aware of one.

4 Q. Is that just done orally then?

5 A. I don't recall how it was ever
6 presented -- I can only, again, testify on my
7 behalf. I don't recall how it was ever
8 presented, of a request.

9 Q. Was a request to deploy a cell site
10 simulator ever presented to you?

11 A. I don't recall when the last one was
12 or if there was one. I don't recall that.

13 Q. You don't recall any requests to
14 deploy a cell site simulator were made to you?

15 A. I don't recall.

16 Q. Do you recall any request in which you
17 had some involvement in staffing a request?

18 A. I don't recall that at all.

19 Q. Can you describe -- Let's go back to
20 January 2015 specifically.

21 What was -- what were your job
22 duties that were related to the cell site
23 simulator specifically?

24 A. There was no specific duties to that.

1 Q. Okay. So could you describe for me
2 anything you actually did related to the cell
3 site simulator?

4 A. I don't recall doing anything in that
5 time period at all.

6 Q. Were you ever involved in setting up
7 the system in the car?

8 A. No.

9 Q. Who was responsible for that?

10 A. I don't recall.

11 Q. Were you ever involved in doing any
12 maintenance on the cell site simulator?

13 A. Once again during that time period?
14 During that time period? No.

15 Q. How about other times?

16 A. I don't recall the times.

17 Q. Have you ever been involved in testing
18 the cell site simulator to see if it was
19 working properly?

20 A. I don't recall, sir. No.

21 Q. Have you ever been involved in any
22 duties related to any data that was acquired
23 through the cell site simulator?

24 A. I don't recall.

1 Q. Do you know whether there is a
2 component in the cell site simulator that
3 stores any data that's collected?

4 A. I don't recall.

5 Q. The black SUV that held the cell site
6 simulator, are there any records kept of its
7 movement?

8 A. Not that I'm aware of.

9 Q. Let's go back to paragraph 3 in your
10 declaration.

11 Again the phrase "the system
12 known as the cell site simulator".

13 You said -- well, I will ask you,
14 do you know the model name?

15 A. No, I don't.

16 Q. Let's go to Paragraph 4.

17 You say "as of late 2014 the
18 CPD's only active, usable cell site simulator
19 system was a StringRay system", do you see
20 that?

21 A. Yes.

22 Q. Does that refresh your recollection
23 about any name, specific name of the cell site
24 simulator, was it a StringRay system?

1 A. It is referred to, yes. I'm reading
2 this now, yes.

3 Q. When you say as of late 2014, can you
4 be any more specific about when?

5 A. I was on vacation during that period
6 so, right up before vacation.

7 Q. So December of 2014, would that be
8 accurately describe what you meant as of late
9 2014?

10 A. Second week, yes, first week in
11 December, right.

12 Q. And when you say "active" in that
13 sentence, what did you mean by active?

14 MR. MINE: Objection, you are only
15 using one word, "active, usable" those are
16 operating together.

17 MR TOPIC: Okay. I will let the
18 witness testify about whether it is to be used
19 together or not.

20 THE WITNESS: My answer would have
21 been a usable system.

22 BY MR. TOPIC:

23 Q. Did you mean active and usable to be
24 synonyms?

1 A. A usable system, yes.

2 Q. As of late 2014 did CPD have any
3 inactive unusable sell site simulators in its
4 possession?

5 A. To the best of my knowledge, no.

6 Q. In that paragraph you describe the
7 hardware components as being comparable in size
8 to stereo components or computer drives, is
9 that correct?

10 A. Yes.

11 Q. Is there any component in which one
12 reasonably abled bodied person would not be
13 able to pick it up?

14 A. No.

15 Q. You also say these hardware units can
16 only be used when these components are
17 installed together in unison, how do you know
18 that to be true?

19 A. The units need each other to work as
20 one.

21 Q. Right. How do you know that to be true
22 though?

23 A. Certain components on the system,
24 there is a power unit, without that power unit

1 these other devices would not have power.

2 So simply removing one unit as a
3 power unit you would not be able to operate
4 this. Or there would be no power to these other
5 units.

6 Q. So you mean that the system will not
7 work if it doesn't have a power unit, is that
8 correct?

9 A. Correct.

10 Q. And a power unit is what supplies
11 power to the system?

12 A. Correct.

13 Q. Are there any other components that
14 are -- well, let me ask another question.

15 Other than your answer regarding
16 the power unit, is there any other reason or
17 basis for your statement that the hardware
18 units can only be used when they are installed
19 and all components working together?

20 A. My understanding is that with these
21 units, the power unit is part of this
22 component, without that it wouldn't be -- it
23 wouldn't be an operable unit.

24 Q. And the basis for your understanding

1 is what?

2 A. Supplies power to the other units.

3 Q. Are there any other components where
4 you come to the same conclusion if they were
5 removed the system wouldn't work?

6 A. Not that I'm aware of.

7 Q. In Paragraph 4, going back to the
8 first page. You say that the StingRay is quote
9 "manufactured and maintained by Harris
10 Corporation, what do you mean is maintained by
11 Harris Corporation?

12 A. My understanding is when it was sent
13 out for upgrades, that's part of the
14 maintenance of this equipment.

15 Q. Let's go to paragraph 5, that begins
16 by stating while CPD's StingRay system was in
17 possession of the Harris Corp. for maintenance
18 and upgrade during the entire month of
19 January 2015, you don't know from any firsthand
20 knowledge that the system was in the possession
21 of Harris Corporation in that time period,
22 correct?

23 A. Yes. My understanding that it was in
24 the possession of Harris during that time

1 period, through my supervisor.

2 Q. Okay. You were told that the system
3 was in the possession of Harris?

4 A. Was not in the vehicle.

5 Q. You knew it wasn't in the vehicle and
6 you were told that it was at Harris?

7 A. By my supervisor.

8 Q. That was in early 2015?

9 A. January.

10 Q. Do you know what the maintenance or
11 upgrade being done by Harris was?

12 A. No..

13 Q. Do you know whether there is any
14 documentation related to this maintenance or
15 upgrade referenced in paragraph 5?

16 A. I'm not aware of any.

17 Q. Are you aware of any other times in
18 which the CPD's cell site simulator system was
19 sent to Harris or upgraded or anything?

20 A. I'm not aware.

21 Q. In paragraph 5 you say "CPD had no
22 working cell site simulator system to deploy or
23 utilize in the City of Chicago", did CPD have
24 any cell site simulator in its possession it

1 could not deploy or utilize in the City of
2 Chicago during the time period referenced in
3 that paragraph?

4 A. I was unaware of one, to the best of
5 my knowledge.

6 Q. Do you know whether CPD was offered a
7 loner cell site simulator during that time
8 period?

9 A. I have no knowledge.

10 Q. Is it your understanding that one of
11 the allegations in the complaint is that in
12 January of 2015 a cell site simulator was
13 deployed at a Martin Luther King Day Protest?

14 MR. MINE: Objection, lack of
15 foundation.

16 BY MR TOPIC:

17 Q. I'm asking about your understanding?

18 MR. MINE: Of your complaint?

19 BY MR TOPIC:

20 Q. Yes. If you know?

21 A. I was unaware of that.

22 Q. Do you have any knowledge about any
23 police activity related to a Martin Luther King
24 Protest in January of 2015?

1 MR. MINE: Objection, vague, as to any
2 police activity. You can answer.

3 THE WITNESS: To the best of my
4 ability I have no knowledge of any police
5 activity.

6 BY MR TOPIC:

7 Q. If you wanted to know whether a cell
8 site simulator was used on a particular date
9 how would you go about answering that question?

10 MR. MINE: Objection, vague, calls for
11 speculation. You can answer, if you can.

12 THE WITNESS: I would have no idea how
13 you would come up to that conclusion or that --
14 answer to that question.

15 BY MR TOPIC:

16 Q. Do you have any understanding of any
17 legal limitations on the CPD's use of sell site
18 simulators?

19 MR. MINE: Objection. Also it is
20 vague, and also to the extent you are asking
21 for a legal conclusion from a nonlawyer.

22 BY MR TOPIC:

23 Q. I'm not asking what they are, at least
24 at this point, I'm just asking if you are aware

1 of any?

2 A. My only understanding is in the
3 non-disclosure statement that was signed with
4 the FBI.

5 Q. Okay. So you are not aware of any
6 policy or procedure that says from CPD that
7 says a cell site simulator cannot be used for a
8 particular purpose, for example?

9 A. I have no knowledge of any policies
10 that pertain to this equipment with the CPD.

11 Q. And if there were any policies do you
12 think you would know about them?

13 MR. MINE: Objection, calls for
14 speculation.

15 THE WITNESS: Again all I can testify
16 is as of today I have no knowledge of any
17 policies pertaining to this equipment.

18 BY MR TOPIC:

19 Q. And if there was such a policy would
20 you be surprised to learn about it?

21 MR. MINE: Objection, calls for
22 speculation.

23 THE WITNESS: Again I could testify I
24 have no knowledge of any policies that are --

1 of the CPD pertaining to this equipment.

2 BY MR TOPIC:

3 Q. And if you were going to look for such
4 a policy where would you look?

5 A. Again my understanding there is no
6 policy. I have no -- best of my knowledge
7 there is no policy in CPD pertaining to this
8 equipment.

9 Q. And this equipment is cell site
10 simulators, correct? Was there something else
11 you were going to say?

12 A. No.

13 Q. I'm sorry. I cut you off.

14 A. No.

15 Q. Do you know whether a cell site
16 simulator can be used to obtain the content of
17 a cell phone communication?

18 MR. MINE: You can answer, if you know,
19 generally but I direct you not to disclose any
20 confidential details. Also vague as to content.

21 THE WITNESS: No, I don't. I don't
22 have, to the best of my ability I wouldn't have
23 knowledge on that. I don't recall that being
24 discussed or --

1 BY MR TOPIC:

2 Q. How about being used to determine the
3 location of someone?

4 MR. MINE: Same objection and same
5 direction. Answer generally, if you know.

6 THE WITNESS: Again I feel that would
7 be something that would have to be -- I would
8 be in violation of the disclosure.

9 BY MR TOPIC:

10 Q. Okay. Would you otherwise be able to
11 answer that question?

12 A. I wouldn't recall on the ability of
13 the particulars on that, but I don't recall.

14 Q. Are you familiar with a cell phone app
15 called Open Signal?

16 A. No.

17 Q. Before signing the declaration here,
18 Exhibit 1, did you review any documents to
19 insure that it was accurate, that the
20 declaration was accurate?

21 A. Yes.

22 Q. What documents were those?

23 A. The declaration itself.

24 Q. Were there any other documents?

1 A. No.

2 Q. And did you have any discussions with
3 anyone about this declaration before you signed
4 it?

5 A. Yes.

6 Q. Okay. How many people?

7 A. I don't recall.

8 Q. Were there lawyers that you discussed
9 the declaration with, just yes or no and I'm
10 not asking what you talked about it, I just
11 want to know if there were any lawyers you
12 discussed it with?

13 A. Yes.

14 Q. Were there any non lawyers that you
15 discussed the declaration with before you
16 signed it?

17 A. Yes.

18 Q. Who were those people?

19 A. My supervisor, which would be Sergeant
20 Fidducca.

21 Q. Anyone else?

22 A. I don't recall.

23 Q. What did you and Sergeant Fidducca
24 discuss about your declaration before you

1 signed it?

2 MR. MINE: Object and direct the
3 witness not to answer on the grounds of
4 attorney/client privilege.

5 BY MR TOPIC:

6 Q. Would you be able to answer that
7 question other than for the instruction?

8 A. When I was assigned to the tech lab
9 there are certain things in here about my
10 position, my responsibilities.

11 Q. Did an attorney direct you to talk
12 with Sergeant Fidducca about your declaration?

13 A. No. I don't recall.

14 Q. As far as you know, as far as you
15 recall no lawyer said you should talk to
16 Fidducca about the declaration, is that right?

17 A. Yes.

18 Q. And did you go to Fidducca to talk
19 about the declaration or did he come to you?

20 A. He came to me.

21 Q. And did he tell you that he was
22 instructed by a lawyer to do that?

23 A. I don't recall.
24

1 MR. TOPIC: I'm not seeing any basis for
2 work/product here.

3 Q. I will ask again.

4 What did you and Sergeant
5 Fidducca discuss about your declaration?

6 A. Again as I explained my time in the
7 lab, my duties and my responsibilities.

8 Q. Would that be -- paragraphs 1 and 2 --
9 I'm sorry. -- 2 and 3 of your declaration.

10 A. Yes.

11 Q. Did you have any discussions with
12 Sergeant Fidducca about paragraphs 4 -- 3
13 -- 4 and 5 of your declaration?

14 A. I'm sorry. Paragraph 4 was what I was
15 explaining to Sergeant Fidducca.

16 And paragraph 5 was also what I
17 was explaining to him, but then with the
18 possession of the Harris equipment and
19 possession of the equipment -- Harris --
20 possession of the equipment during that time
21 period, also, because it was related to
22 Sergeant Costa being the supervisor of the
23 tech lab.

24 Q. So you discussed paragraphs 4 and 5

1 with Sergeant Fidducca before you signed the
2 declaration, right?

3 A. Yes.

4 Q. And are some of the facts in
5 paragraph 4 and 5 facts that you -- the basis
6 for those facts is Sergeant Fidducca and not
7 your prior personal knowledge?

8 A. No.

9 Q. Were you checking with Sergeant
10 Fidducca for the accuracy of those statements?

11 A. No.

12 Q. What was the discussion you had with
13 Sergeant Fidducca about paragraphs 4 and 5?

14 A. Nothing in 4.

15 5, just as I explained to him
16 that it was my understanding that the equipment
17 was out during this time period, which was
18 related to Sergeant Costa.

19 And also Sergeant Costa related
20 to him that it was also out during that period,
21 and that was the content of our conversation.

22 Q. Were you just confirming the accuracy
23 of that statement with Sergeant Fidducca?

24 A. Well, I already knew -- I mean again

1 getting that from Sergeant Costa, I didn't need
2 to confirm that with Sergeant Fidducca.

3 Q. So what was the purpose of having that
4 conversation Sergeant Fidducca?

5 A. There was no purpose to it, it was
6 just more or less reiterating the fact that it
7 was out during that time period.

8 Q. What do you mean by reiterating the
9 fact that it was out there?

10 A. I explained to him that I knew from
11 Sergeant Costa that it was out during that
12 period.

13 Q. So you just wanted him to know that
14 you knew that?

15 A. No. I don't know the extent of our
16 conversation of how we went with this, back and
17 forth, but that was all that there was, there
18 was no confirmation of it, I already knew that.

19 Q. In the course of your work,
20 have you come across any Court orders or
21 applications for Court orders to deploy cell
22 site simulators? I know you weren't involved
23 in it, but have you ever seen it?

24 A. I don't recall.

1 Q. In preparing for your deposition
2 today, are there -- what documents did you
3 review?

4 A. Just my declaration.

5 Q. What else did you do to prepare for
6 your deposition?

7 A. Met with my attorneys.

8 Q. I'm not going to ask the details,
9 tell me approximately how long you met for?

10 A. A few hours.

11 MR. TOPIC: Let's take a break for a
12 couple of minutes.

13 (Recess.)

14
15 BY MR. TOPIC:

16 Q. You mentioned a lock box that
17 contained keys to the black SUV, do you recall
18 that?

19 A. Yes.

20 Q. Is there any sign-out or record kept
21 when those keys are removed from the lock box?

22 A. Not that I'm aware of.

23 Q. In January of 2015 if someone at CPD
24 wanted to deploy a cell site simulator who's

1 approval do they need?

2 A. It would be my supervisor.

3 Q. So at one point that was Jack Costa,
4 right? Is that right? Yes?

5 A. Yes.

6 Q. And today that would be Fidducca?

7 A. Yes.

8 Q. In January of 2015 what devices did
9 CPD possess that were capable of acquiring the
10 subscriber ID of a cell phone, and you could
11 exclude sell site simulators without admitting
12 to me that it has that capability?

13 A. I'm sorry. Again could you please --

14 Q. Let me put a little context.

15 I'm going to ask you a series of
16 questions here about what kind of equipment the
17 tech lab had.

18 I'm going to exclude sell site
19 simulators entirely from that.

20 I'm not going to ask you to admit
21 that a cell site simulator can do the thing I'm
22 asking about.

23 Does that make sense?

24 A. Yes.

1 Q. Setting aside cell site simulators, in
2 January of 2015 were there any devices or
3 equipment in the tech lab that were capable of
4 acquiring the subscriber ID from a cell phone?

5 MR. MINE: Object to relevance. This
6 case is about cell site simulators, so other
7 than your curiosity, I don't see it is
8 relevant. You can answer the question.

9 BY MR TOPIC:

10 Q. It is about a particular piece of
11 surveillance and the name for the device?

12 A. There was no devices to the best of my
13 knowledge.

14 Q. Same question for overhearing the
15 contents of the cellular communication?

16 A. To the best of my knowledge,
17 no.

18 Q. Same question as to obtaining the
19 content of any text messages from a phone?

20 A. A device, no, to the best of my
21 knowledge, no.

22 Q. When you said device, were you
23 distinguishing from obtaining it through a
24 third party provider, for example?

1 A. No. Actually I was referring to, there
2 is pen registers which we can't, that's
3 something, that's Court order. That's not
4 devices, no. There are no devices.

5 Q. Understood. Same questions for
6 tracking someone's location?

7 A. Not to my knowledge. No, best of my
8 knowledge. No.

9 Q. And with regard to any cell site
10 simulator equipment your knowledge is based on
11 what would be kept in the tech lab, correct?

12 A. I'm sorry.

13 Q. As to any sell site simulators CPD has
14 possessed, any knowledge you have about that is
15 about any cell site simulators that are kept in
16 the tech lab, is that right?

17 A. Yes.

18 Q. So you don't know whether there are
19 any sell site simulators or components that are
20 kept outside of the tech lab, correct?

21 A. To the best of my knowledge,
22 no.

23 Q. To the best of your knowledge you
24 don't know whether there are?

1 A. I'm aware of the devices that we
2 during that time period we possessed or we
3 didn't possess. I don't know of any other
4 devices within CPD.

5 Q. You don't know one way or another
6 about what is kept outside of the tech lab,
7 correct?

8 A. Yes.

9 Q. Are you familiar with a Trigger Fish?

10 A. I heard of it, the term.

11 Q. Okay. Have you ever seen the Trigger
12 Fish?

13 A. I don't know what this is, this
14 Trigger Fish, whatever you call this. No, I've
15 never seen it. I've heard of the term, but I've
16 never actually identified that piece as being a
17 Trigger Fish.

18 Q. Do you know whether in January of 2015
19 CPD had a Trigger Fish?

20 A. I -- best of my ability I don't recall
21 if there was anything there, a Trigger Fish
22 or --

23 Q. Do you understand Trigger Fish to be a
24 hand-held device?

1 A. I don't.

2 Q. Are you aware of any hand-held cell
3 site stimulator devices?

4 A. Best of my knowledge, no.

5 Q. Are you familiar with the term IMS eye
6 catcher or MCE catcher?

7 A. Again I've heard of the term. I don't
8 know what the specifics are on what it entails
9 or what it does, but I've heard the term.

10 Q. Do you know whether in January of 2015
11 CPD had an IMS eye catcher in its possession?

12 A. To the best of my knowledge, no.

13 Q. Are you familiar with the term
14 "digital analyzer"?

15 A. Once again I've heard of it.

16 Q. And do you know what a digital
17 analyzer is?

18 A. Best of my knowledge, no.

19 Q. Did you know whether CPD had a digital
20 analyzer in January of 2015?

21 A. Again best of my knowledge, no.

22 Q. How about a King Fish, are you
23 familiar with the device called a King Fish?

24 A. Again heard of the term, but don't

1 know exactly what it would be or what it would
2 look like.

3 Q. Do you know whether CPD had a King
4 Fish in January of 2015?

5 A. Best of my knowledge, no, I don't.

6 Q. We are going to do a few more times
7 with the list.

8 Are you familiar with the device
9 called an Amber Jack?

10 A. I've heard of the term but could not
11 identify what it was.

12 Q. And do you know whether CPD had an
13 Amber Jack?

14 A. Best of my knowledge, no, I don't know
15 that we have.

16 Q. I think I already know -- you think
17 you know what I'm going to ask, but we have to
18 go one at a time so that the court reporter
19 gets it down.

20 Are you familiar with the device
21 called a Wolf Pack?

22 A. No, I've never heard of that term.
23 So --

24 Q. Okay. And are you familiar with a

1 Gossamer devise?

2 A. Never heard of it.

3 Q. How about a DRT box or a dirt box, are
4 you familiar with that?

5 A. I've heard of the term, but I'm not
6 familiar with.

7 Q. Do you know whether CPD had a dirt box
8 in January of 2015?

9 A. I'm not aware if we possessed that or
10 not.

11 Q. Are you familiar with a device called
12 a swamp box?

13 A. No.

14 Q. Are there any other devices that you
15 are aware of that have the capacity to remotely
16 access information or intercept communications
17 made using a cell phone?

18 A. Best of my knowledge, no.

19 Q. Would you say relative to other duties
20 that you spend a lot or a little time related
21 to sell site simulators?

22 A. Little.

23 Q. Do you know whether any cell site
24 simulators had ever been in a vehicle other

1 than the black Ford SUV that you described?

2 MR. MINE: Objection, vague as to
3 timeframe.

4 THE WITNESS: I don't recall any other
5 devices in that vehicle during that time
6 period.

7 BY MR TOPIC:

8 Q. My question is the other way around,
9 the device in any other vehicle?

10 A. I'm unaware of that. I can't --

11 Q. So just sitting here, best of your
12 memory, in the course of your work in the
13 tech lab, are you aware of a cell site
14 simulator ever being in a vehicle other than
15 the black SUV you described?

16 A. No, best of my ability I don't recall
17 it being in any other vehicle.

18 Q. Have you ever seen the device outside
19 of the vehicle or any of the components of the
20 device being outside of the vehicle?

21 A. I don't recall.

22 Q. And I asked you some questions about
23 training related to cell site simulators.

24 Do you recall any details about

1 when or in general what the training was about?

2 A. I don't recall it at all.

3 Q. Do you recall whether you have had any
4 training in the last year about cell site
5 simulators?

6 A. I don't recall.

7 Q. The black SUV that contained or has
8 contained the cell site simulator, is that an
9 unmarked car?

10 A. Yes.

11 MR. TOPIC: Okay. I do not have any
12 further questions for you.

13 MR. MINE: No questions. Reserve.

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1 STATE OF ILLINOIS)

2) SS:

3 COUNTY OF COOK)

4 The within and foregoing deposition
5 of the aforementioned witness was taken before
6 Carol M. Siebert-LaMonica, C.S.R, at the place,
7 date and time aforementioned.

8 There were present during the taking
9 of the deposition the previously named counsel.

10 The said witness was first duly sworn
11 and was then examined upon oral interrogatories;
12 the questions and answers were reported in
13 shorthand by the undersigned and transcribed
14 via computer-aided transcription.

15 The within and foregoing is a true,
16 accurate and complete record of all of the
17 questions asked of and answers made by the
18 forementioned witness at the time and place
19 hereinabove referred to.

20 The signature of the witness was
21 not waived and the deposition was submitted
22 pursuant to Rules 207 and 211 (d) of the Rules
23 of the Supreme Court of Illinois to the
24 deponent per copy of the attached letter.

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The undersigned is not interested in
the within case, nor of kin or counsel to any
of the parties.

Witness my official signature in and
for Cook County Illinois on July 27, 2017.



Carol M. Siebert-LaMonica
C.S.R. No. 084.001355

C O R R E C T I O N P A G E

I made the following changes for the following reasons:

PAGE LINE CHANGE:

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(Signed) _____

WITNESS CERTIFICATION

I hereby certify that I have read the foregoing transcript of my deposition consisting of Pages 1 through 96, inclusive. Subject to the changes set forth on the preceding pages, the foregoing is a true and correct transcript of my deposition taken on July 24, 2017.

(Signed) _____

SUBSCRIBED AND SWORN TO

Before me this ___ day of

_____, 2017.

Notary Public

SIEBERT & ASSOCIATES COURT REPORTERS, INC.

3768 North Oleander Avenue

Chicago, IL 60634

July 27, 2017

CITY OF CHICAGO

DEPARTMENT OF LAW

MR. ANDREW S. MINE

MS. TARA KENNEDY

30 North LaSalle Street, Suite 1230

Chicago, IL 60602

Re: BOYLE V. CITY/CHICAGO

Dep: OFFICER RONALD BONADURER

Dear MR. MINE:

The deposition testimony given on July 24, 2017 in the above captioned case has been transcribed, and inasmuch as signature was not waived, this is to advise that the deposition will be available in our office for 30 days for reading and signing.

If you choose to read and sign the deposition at our offices, please call the

undersigned for an appointment. Our office
hours are from 9:00 a.m. to 4:00 p.m., Monday
thru Friday.

If you choose to make other
arrangements for the reading and signing of the
deposition, please advise us of the
arrangements you have made in writing with 30
days from the date of this letter.

Sincerely yours,

Carol M. Siebert-LaMonica

I N D E X

Witness:	Examination
OFFICER RONALD BONADURER	

Mr. Topic	4
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