

September 26, 2018

Margaret A. Hickey
Schiff Hardin LLP
233 S. Wacker Drive
Suite 7100
Chicago, IL 60606
mhickey@schiffhardin.com

RE: Chicago Police Consent Decree Independent Monitor Selection Process
Request for Supplemental Information

Dear Ms. Hickey:

Thank you for responding to the Request for Proposals issued jointly by the Office of the Illinois Attorney General and the City of Chicago (collectively, “the Parties”) seeking individuals or firms interested in serving as the Independent Monitor. The Parties have had an opportunity to review your submission and would like to request supplemental information.

Please review the requests attached to this letter and provide your responses on or before the close of business October 10, 2018. Your written responses should be submitted in electronic format (PDF) and in hard copy. Please send the electronic responses to the OAG at LTScruggs@duanemorris.com and to the City at Aslagel@taftlaw.com. Please include “City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information” in the email subject line and on the package containing a hard copy of the proposal. Hard copies should be sent to the addresses below by USPS Priority Mail or overnight carrier (e.g., FedEx, UPS, DHL) to ensure timely delivery to the addresses below:

For the Attorney General for the State of
Illinois:

Lisa T. Scruggs
Special Assistant Attorney General
Duane Morris LLP
190 South LaSalle Street, Suite 3700
Chicago, IL 60603

For the City of Chicago:

Allan T. Slagel
Counsel for the City
Taft Stettinius & Hollister LLP
111 East Wacker Drive, Suite 2800
Chicago, IL 60601

The Parties have set the following dates for interviews and two public forums that finalists will be required to attend. Please plan accordingly. The interviews will take place on November 1 and 2, 2018 with the specific time and place to be determined later. The public forums are scheduled to take place on Saturday, November 3, 2018 at the James R. Thompson Center, 100 W. Randolph St., Chicago, IL.

We expect to provide additional information and more detailed schedules after October 15. In the meantime, if you have any questions, please direct them to the Parties via email to Lisa Scruggs and Alan Slagel.

Sincerely,

Lisa T. Scruggs
For the Office of the Attorney General
for the State of Illinois

Alan T. Slagel
For the City of Chicago

City of Chicago Police Department Independent Monitoring RFP Parties' Joint Request for Supplemental Information

Please review the requests listed below and provide your responses on or before the close of business October 10, 2018. Your written responses should be submitted in electronic format (PDF) and in hard copy. To the extent that you believe any of the information requested was already provided as part of your initial response to the RFP, please so state and identify the page(s) where the information can be located.

1. Please provide a description of the roles and responsibilities for each member listed on your team. Please clearly define the roles and responsibilities and map them specifically to each task of monitor team members. Please be sure to tell us what the day-to-day responsibilities of each member of your leadership team will be. In your answer, you should, a) specify which of your team members will provide subject matter expertise regarding specified law enforcement functions and operations, engage in statistical or data analysis, participate in outreach to stakeholder communities, provide legal analysis, undertake project management responsibilities, or write reports and b) identify the projected amount of time or percentage of time each member will engage in each function.
2. Please describe how the size and composition of your team will allow for efficient operations. If you plan to modify the size or composition of your team, please describe your plan in more detail. If you expect to make any changes, identify the potential individual team member(s) involved and the role you expect the team member(s) to fulfill or activities they will handle and how the change will affect your overall monitoring plan. Also, to the extent changes in the team composition may affect your cost estimate, please so indicate and detail how the cost estimate would be modified.
3. Describe the distribution of work between the lawyers and the subject matter experts (SMEs) who will serve on your team, particularly between the division of responsibilities between the lawyers and the SMEs who have served in law enforcement.
4. The Parties have agreed to an annual budget cap of \$2.85 million. If your response to this request for supplemental information changes your cost estimate, or if your cost estimate exceeds the cap or you did not provide a complete cost estimate with your initial application, please provide an updated cost estimate. The updated estimate should include a description of how the applicant would fulfill the responsibilities of the Monitor within this cap and what adjustments, if any, you would make to ensure that all required work will be performed within this cap. There is no requirement to submit a revised cost estimate if your previously submitted cost estimate fell within the above-identified cap and no change is necessary.
5. Please include more detailed information to support your cost estimate, including: the total number of hours anticipated to monitor compliance with the consent decree during each of the first three years of the monitoring term, broken down by consent decree section, task (training assessment, policy review/development, technical assistance, community/police outreach), and monitoring team member(s).

6. In your cost estimate, you include projected hours that are contemplated for various activities. Please explain the basis and your rationale for each of those projections.
7. What commitment, if any, will your team make to ensure the performance of work that is necessary but that may fall outside the budget in any given year? In your response, please be sure to identify any team members who have indicated a willingness to provide work on a pro bono or non-billable basis.
8. The RFP contains a statement requesting that all communications with Parties be disclosed. To the extent you have had any communications, written or oral with either or both of the Parties or their consultants or experts before or after September 4, 2018 regarding the IM selection process or consent decree, please detail them. If your response to the RFP contained a statement regarding communications prior to September 4, 2018, there is no need to re-submit that information.
9. If any team members have government jobs and expect to retain those jobs during the term of the monitorship, please confirm that the team members' employment contracts or applicable employment policies permit outside work, and if required by their employer's policies or rules, that their employers are aware that they have applied to serve as the monitor or a member of the monitoring team in this matter.
10. If any team members intend to maintain a full-time job during the term of the monitorship in a position that does not contemplate work on a client-by-client basis (i.e., consultant or firm attorney), please describe how the team member intends to manage his or her full time employment obligation simultaneously with his or her monitorship responsibilities and confirm that their employers are aware (or will be made aware) that they have applied to serve as the monitor or a member of the monitoring team in this matter.
11. Many provisions in the proposed consent decree require the development and/or maintenance of technology systems capable of capturing and analyzing data. To meet the obligations of the consent decree, the City may need to implement significant changes to its automated data systems. The monitoring team will be responsible to assess the adequacy of the upgrades and may need to provide technical assistance. Please detail the experience your team has with the implementation of processes to collect and analyze data. In your response, identify the specific team member(s) who have that experience and how that experience might be used during the term of the monitorship.
12. What is your team's plan for gathering basic information about the Chicago Police Department and the status of its policing reform efforts at the outset of the monitorship?
13. Please provide more information on the team's proposed monitoring methodology. Specifically, describe the team's:
 - Approach to the development of a monitoring plan and staging of monitoring activities/priorities;
 - Establishment and measurement of compliance thresholds;
 - Engagement and collection of information from all stakeholder communities;

- Sources of information/data/access; and
 - Capacity to provide ongoing technical assistance.
14. Describe the distribution of work between the lawyers and the subject matter experts (SMEs) who will serve on your team, particularly between the division of responsibilities between the lawyers and the SMEs who have served in law enforcement.
 15. Please describe in greater detail the role and responsibilities of the Community Engagement Team, including the specific duties that will be performed by each member of the team and the scope of the work to be completed by the University of Illinois at Chicago. Your proposal indicates that the Community Engagement Team will be in Chicago 200 hours for each of two people and unspecified amounts of time for two SMEs. Please provide more detail about the tasks and activities these team members will conduct.
 16. For each team member, identify the number of hours and the percentage of time they will spend on each activity required for this project. What other professional commitments does each team member have? What percentage of their time will be spent on all other professional commitments?
 17. For Component II of your proposed Methodology, please describe the role community outreach and stakeholder collaboration will play in your ability to perform compliance reviews and audits.
 18. If there are public reports for Monroe's Meridian MS work, please provide them.

City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information

October 10, 2018

Submitted to:

Lisa T. Scruggs
Special Assistant Attorney General
Duane Morris LLP
190 S. LaSalle St.
Ste. 3700
Chicago, Illinois 60603
(And via email to LTScruggs@duanemorris.com)

Allan T. Slagel
Counsel for the City
Taft Stettinius & Hollister LLP
111 East Wacker Dr.
Ste. 2800
Chicago, Illinois 60601
(And via email to ASLagel@taftlaw.com)

Submitted by:

Schiff Hardin LLP
Margaret Hickey
Partner
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606

Schiff
Hardin

CNA
ANALYSIS & SOLUTIONS

- 1. Please provide a description of the roles and responsibilities for each member listed on your team. Please clearly define the roles and responsibilities and map them specifically to each task of monitor team members. Please be sure to tell us what the day-to-day responsibilities of each member of your leadership team will be. In your answer, you should, a) specify which of your team members will provide subject matter expertise regarding specified law enforcement functions and operations, engage in statistical or data analysis, participate in outreach to stakeholder communities, provide legal analysis, undertake project management responsibilities, or write reports and b) identify the projected amount of time or percentage of time each member will engage in each function.***

Our team will adopt a highly cooperative and collaborative approach, with **Maggie Hickey** serving as the Monitor and **Chief Rodney Monroe** and **Dr. Chip Coldren** serving as Deputy Monitors. Ms. Hickey will be the principal public spokesperson for the team, lead most public meetings, be the final team arbiter on all compliance issues, and bear ultimate responsibility for overseeing CPD's efforts to achieve full and effective compliance with the consent decree. Ms. Hickey, Chief Monroe, and Dr. Coldren will be the principal liaisons to the Court and the Parties.

On a day-to-day basis, Ms. Hickey, Chief Monroe, and Dr. Coldren will engage in phone calls, in-person meetings, email correspondence and document and data exchanges among and between the Parties, the Chicago Police Department (CPD), community stakeholders, and members of the Monitoring Team. Chief Monroe and Dr. Coldren will manage the team of Associate Monitors, Subject Matter Experts, and support staff and coordinate each aspect of the team's work, including policy and training review, technical assistance, data review and analysis, community surveys, compliance review, and report writing. Chief Monroe and Dr. Coldren will also assist Ms. Hickey in her role as principal public spokesperson as needed.

As detailed in Figure 2 in our proposal, the Deputy Monitors will be responsible for the following consent decree topic areas and associated tasks:

- **Deputy Monitor Chief Rodney Monroe:** Training; Use of Force; Recruitment, Hiring and Promotion; Supervision; Transparency and Accountability; Officer Wellness and Support.
- **Deputy Monitor Dr. James "Chip" Coldren:** Community Policing, Crisis Intervention; Impartial Policing; Data Collection, Analysis and Management; Community Engagement Team; Data Coordination and Report Writing.

Table 1 and **Table 2** specify the team members who will perform the following tasks (as listed in both Question 1 and Question 5): provide subject matter expertise regarding specified law enforcement functions and operations, engage in statistical or data analysis, participate in outreach to stakeholder communities, community/police outreach, provide legal analysis, undertake project management responsibilities, write reports, training assessments, policy review/development, and technical assistance; the tables estimate the hours each team

member will engage in each of the activities. Hours included on the chart reflect both on-site hours and off-site hours combined.

The hours listed are *estimates*, based on our past experiences with similar projects, and will likely vary based on such factors as levels of cooperation and data quality. Please refer to pages 16-18 of our proposal for additional information.

Table 1: Roles and responsibilities of Team Members: Monitors and Associate Monitors, by Hours, Annual Estimates (Q1 & Q5)

| | Maggie Hickey | Rodney Monroe | James "Chip" Colden | Stephen Rickman | Dennis Rosenbaum | Julie Solomon | Paul Evans | Rick Fuentes | Michael Nila | Gil Kerlikowske | Will Johnson | Daniel Giarinto | Scott Decker |
|--|---------------|---------------|---------------------|-----------------|------------------|---------------|------------|--------------|--------------|-----------------|--------------|-----------------|--------------|
| | V-X | II-IV, XI | II | III | IV | V | VI | VII | VIII | IX | X | XI | |
| Consent Decree Section(s) | ALL | | | | | | | | | | | | |
| Provide subject matter expertise regarding specified law enforcement functions and operations (Q1) | 40 | 80 | 23 | 23 | 23 | 23 | 23 | 23 | 23 | 23 | 23 | 23 | |
| Engage in statistical or data analysis (Q1) | 80 | 240 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | |
| Participate in outreach to stakeholder communities (Q1) and community/police outreach (Q5) | 160 | 120 | 112.0 | 67 | 67 | 45 | 67 | 67 | 67 | 67 | 22 | 67 | |
| Provide legal analysis (Q1) | 120 | 40 | | | | 22 | | | | | 45 | | |
| Undertake project management responsibilities (Q1) | 120 | 120 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | |
| Write reports (Q1) | 80 | 80 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | 90 | |
| Training assessment (Q5) | 40 | 80 | 22.5 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | |
| Policy review/development (Q5) | 80 | 40 | 22.5 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | |
| Technical assistance (Q5) | 80 | 40 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | |
| Total Number of Annual Hours | 800 | 800 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 |

Table 2. Roles and responsibilities of Team Members: Subject Matter Experts, Legal Team and Staff, by Hours, Annual Estimates (Q1 & Q5)

| | Hilly Salton | Bruce Johnson | Danise Rodriguez | Terry Garner | Tom Woodruff | Bake McCelland | Brandi Burque | Lara McElroy | Rod Brunson | Tom Christoff | Sodra Williams | Elena Quintana | Joe Hoereth | Ken Richardson | Wheat Elliot | Tammy Felix | Valerie Schmitt | Meredith DeCario | Anthony Sepulveda | Derek Baralla | CHPS Stewart |
|--|--------------|---------------|------------------|--------------|--------------|----------------|---------------|--------------|-------------|---------------|----------------|----------------|-------------|----------------|--------------|-------------|-----------------|------------------|-------------------|---------------|--------------|
| Consent Decree Section(s) | II | II, IV | V | V, X | VI, VIII | VII | IX | X | XI | IV, XI | XI | XI | XI | ALL | ALL | ALL | V | X | VIII | ALL | |
| Provide subject matter expertise regarding specified law enforcement functions and operations (Q1) | 22 | 22 | 22 | 22 | 22 | 22 | 22 | 22 | 22 | | | | 3 | 3 | 3 | 3 | 25 | 25 | 25 | 40 | |
| Engage in statistical or data analysis (Q1) | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | | | | 45 | 32 | 32 | 32 | | | | | |
| Participate in outreach to stakeholder communities (Q1) and community/police outreach (Q5) | 22 | 22 | 22 | 22 | 22 | 22 | 22 | 22 | 22 | 405 | 428 | 360 | | | | 20 | 20 | 20 | 20 | | |
| Provide legal analysis (Q1) | | | | | | | | | | 22 | | | | | | | 180 | 180 | 180 | | |
| Undertake project management responsibilities (Q1) | | | | | | | | | | | | | | 5 | 5 | 5 | | | | | |
| Write reports (Q1) | | | | | | | | | | | | | | | | | | | | | |
| Training assessment (Q5) | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 23 | 22 | 45 | 40 | 40 | 40 | 40 | 25 | 25 | 25 | 20 | |
| Policy review/development (Q5) | 383 | 383 | 373 | 383 | 383 | 383 | 383 | 383 | 383 | | | | | | | | | | | | |
| Technical assistance (Q5) | 383 | 383 | 383 | 383 | 383 | 383 | 383 | 383 | 383 | | | | | | | | | | | | 20 |
| Total Number of Annual Hours | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 450 | 80 | 80 | 80 | 250 | 250 | 250 | 80 | 80 |

- 2. Please describe how the size and composition of your team will allow for efficient operations. If you plan to modify the size or composition of your team, please describe your plan in more detail. If you expect to make any changes, identify the potential individual team member(s) involved and the role you expect the team member(s) to fulfill or activities they will handle and how the change will affect your overall monitoring plan. Also, to the extent changes in the team composition may affect your cost estimate, please so indicate and detail how the cost estimate would be modified.**

We do not plan to make any changes to the composition of our team at this time. Our team is designed to ensure depth and breadth of expertise across all Consent Decree sections, with adequate staff to meet surge requirements and the specific needs of this monitoring engagement.

Our team will maximize efficiencies through a strategically designed and collaborative approach, as depicted in **Figure 1** below. In addition to the Associate Monitors, each of whom will have primary responsibility for determining CPD compliance with their assigned sections of the Consent Decree, our team will include a highly experienced CNA Analyst for each topic area. The Analyst will help collect and organize data and review information to provide to the Associate Monitors for their review, analysis and determinations of compliance. As needed, we will assign Subject Matter Experts to the Associate Monitor/Analyst teams, to provide additional expertise (as depicted in **Figure 2**). This team approach achieves several objectives – it ensures that more than one perspective is represented in each of the key areas of the Consent Decree, and it uses less expensive analyst labor to conduct the basic data collection and organizing tasks, so that the Associate Monitors can focus on review of information, engaging with stakeholders, and compliance determinations. Please also refer to page 19 of our proposal, which provides information about collaboration and cost effectiveness.

Figure 1. Team Collaborative Approach to maximize efficiency.

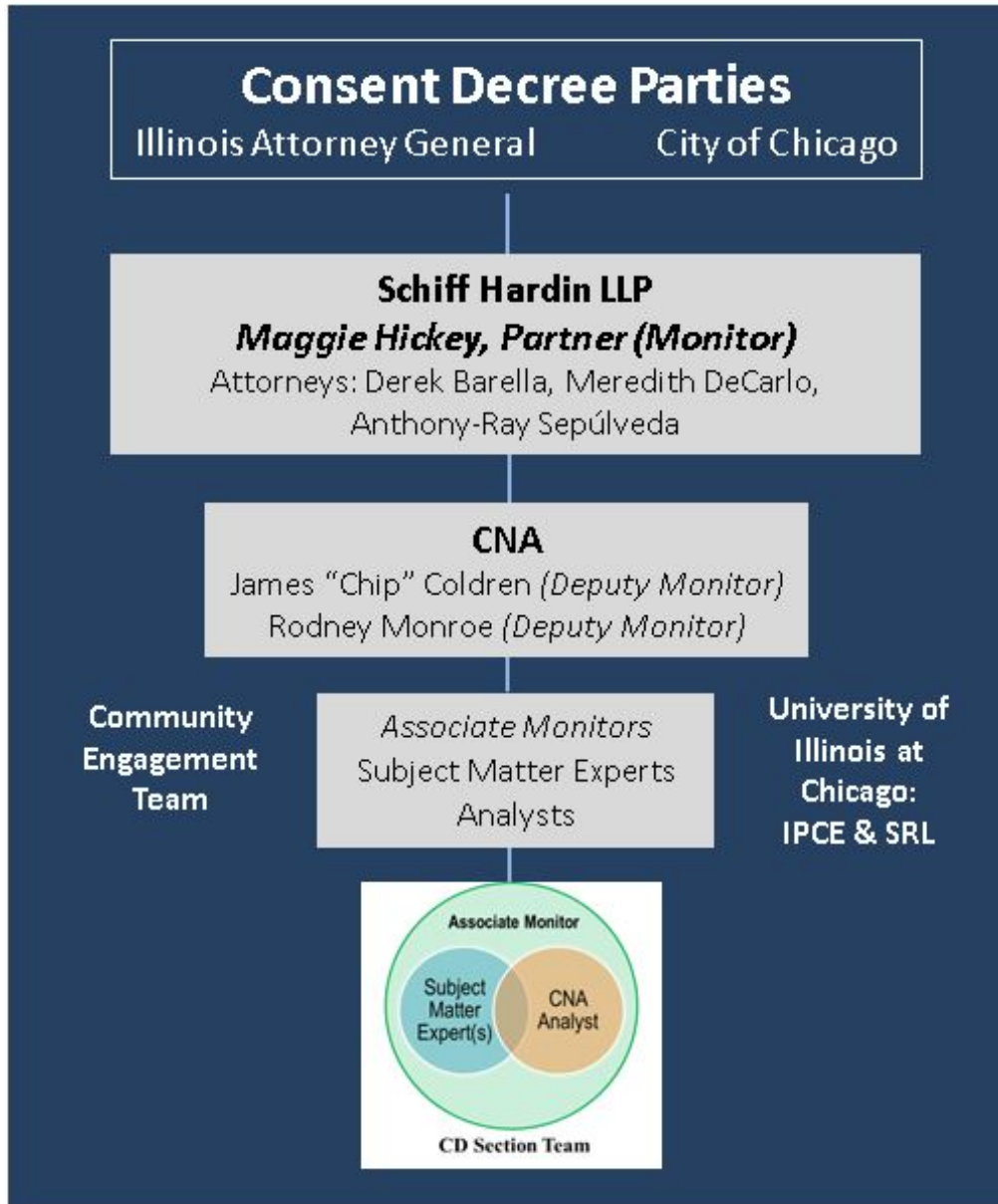
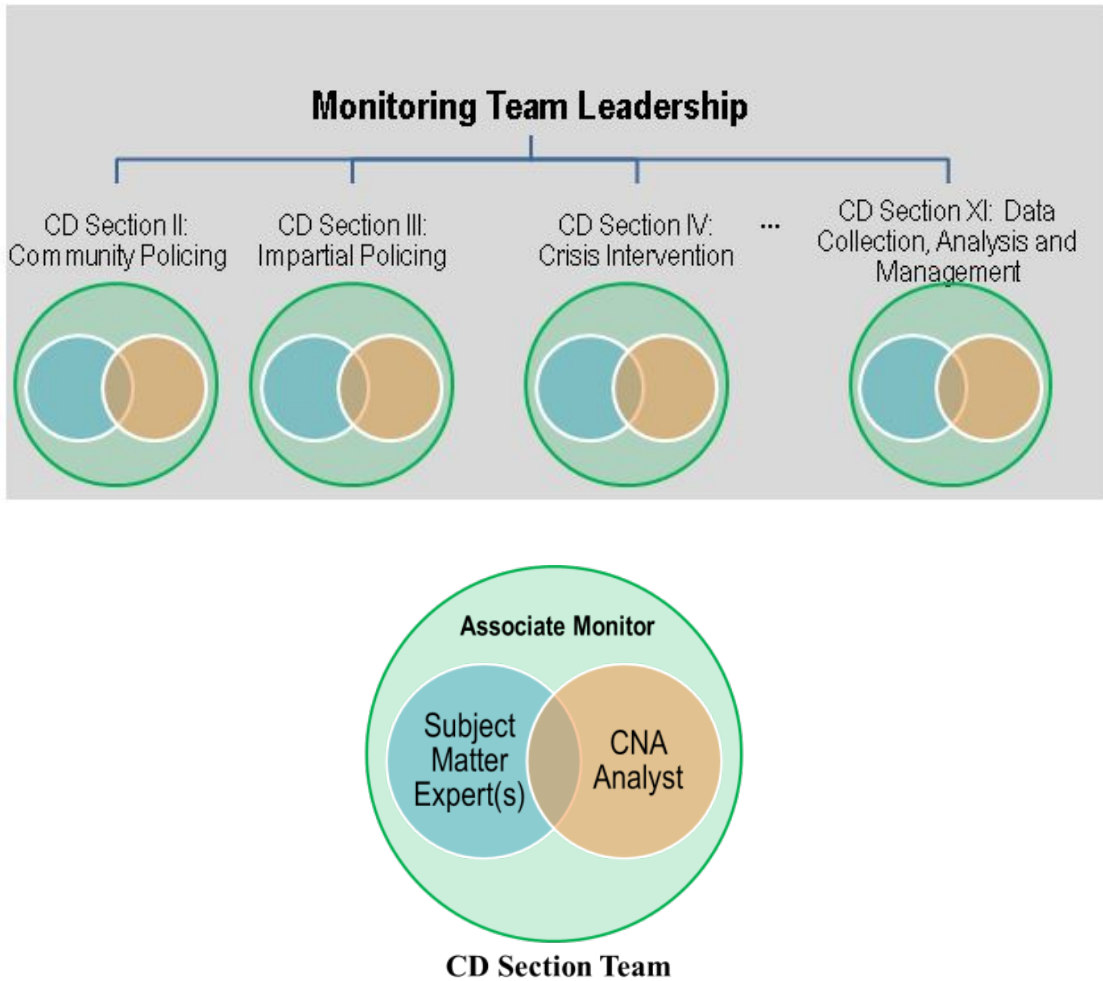


Figure 2. Monitoring Team Organization for each Consent Decree (CD) section.



3. Describe the distribution of work between the lawyers and the subject matter experts (SMEs) who will serve on your team, particularly between the division of responsibilities between the lawyers and the SMEs who have served in law enforcement.

We anticipate that several of the key areas of responsibility under the consent decree will require the assistance of attorneys, in support roles working with our designated Associate Monitors to address legal and administrative questions that arise during compliance monitoring. These key areas of responsibility include: Use of Force, Supervision, and Accountability and Transparency. We plan to assign the following Schiff-Hardin attorneys (listed in our original proposal under “Subject Matter Experts and Legal Team,” page 17) to address each of these key areas as follows, according to their legal expertise:

- **Maggie Hickey** – Overall Coordination between lawyers and SMEs who have served in law enforcement
- **Meredith DeCarlo** – Use of Force

- **Anthony-Ray Sepúlveda** – Accountability and Transparency
- **Derek Berella** – Supervision

The other Subject Matter Experts listed in Figure 1 on page 17 of our proposal will work in support roles with our Associate Monitors, on an as needed basis, in all of the key areas of responsibility. It is important to note that many other members of our team are experienced lawyers (Terry Gainer, Paul Evans, Daniel Giaquinto, and Sodiqa Williams) and may collaborate on issues as they arise throughout the project.

Thus, we envision a division of labor between the attorneys and the other Subject Matter Experts, depending on the extent to which legal matters arise during compliance monitoring in several of the key areas of responsibility. In general, SMEs will advise on changes to tactics, policies, and procedures while the lawyers will advise on legal and administrative requirements. Our staffing approach is flexible to meet needs as they arise during monitoring. We have a robust group of SMEs and lawyers to ensure that we can adequately address any kind of legal or law enforcement matter; but the work of the SMEs, however, will depend on CPD's technical assistance needs during monitoring. In short, we plan to use all Subject Matter Experts and attorneys in the ways that most effectively support the Associate Monitors in all key areas of responsibility.

- 4. *The Parties have agreed to an annual budget cap of \$2.85 million. If your response to this request for supplemental information changes your cost estimate, or if your cost estimate exceeds the cap or you did not provide a complete cost estimate with your initial application, please provide an updated cost estimate. The updated estimate should include a description of how the applicant would fulfill the responsibilities of the Monitor within this cap and what adjustments, if any, you would make to ensure that all required work will be performed within this cap. There is no requirement to submit a revised cost estimate if your previously submitted cost estimate fell within the above-identified cap and no change is necessary.***

Our initial budget estimate fell within the \$2.85 million per year budget cap; no changes are necessary.

- 5. *Please include more detailed information to support your cost estimate, including: the total number of hours anticipated to monitor compliance with the consent decree during each of the first three years of the monitoring term, broken down by consent decree section, task (training assessment, policy review/development, technical assistance, community/police outreach), and monitoring team member(s).***

Table 1 and **Table 2** specify which of our team members will perform the following tasks (as listed in both Question 1 and Question 5): provide subject matter expertise regarding specified law enforcement functions and operations, engage in statistical or data analysis, participate in outreach to stakeholder communities, community/police outreach, provide legal analysis, undertake project management responsibilities, write reports, training assessments, policy review/development, and technical assistance; the tables estimate the

hours each team member will engage in each of the activities. Hours included on the chart reflect both on-site hours and off-site hours combined. These estimates are our best projection based on our past experiences doing similar work.

- 6. In your cost estimate, you include projected hours that are contemplated for various activities. Please explain the basis and your rationale for each of those projections.***

Please refer to **Tables 1 and 2** in this document for the breakdowns requested. These estimates are our best projection, based on our past experiences doing similar work. Our allocations of time for various tasks and activities depend on our interactions with the CPD, the ease of obtaining relevant data, the quality of the data (which figures into a calculation about how much time will be required for data analysis), and other difficult-to-predict variables. Our staffing approach is flexible within our estimated budget, allowing us to shift hours among SMEs and staff depending on the specific needs of this engagement while still remaining under the budget cap.

- 7. What commitment, if any, will your team make to ensure the performance of work that is necessary but that may fall outside the budget in any given year? In your response, please be sure to identify any team members who have indicated a willingness to provide work on a pro bono or non-billable basis.***

Maggie Hickey and **Schiff Hardin** have provided deeply discounted rates for this assignment, as a testament to the importance of this effort to all Chicago residents and Schiff's continued commitment to make the cities in which it works better places. Schiff Hardin was established in Chicago in 1866 and a majority of its lawyers and employees live and work in Chicagoland. Schiff is deeply committed to Chicago and feels strongly that Maggie Hickey and the proposed team is the best team to help CPD achieve its mission and comply with the consent decree.

In the first year alone, according to our proposed budget, Schiff Hardin would be providing nearly \$250,000 in pro bono services compared to its attorneys' standard rates. Of course, once monitoring begins, unforeseen circumstances may necessitate upward adjustments to the hours spent by certain team members. Those adjustments may allocate additional pro bono hours. We will provide the Court with an annual calculation of additional pro bono services provided by Schiff, in addition to the discounted hourly rates.

Our staffing approach is flexible within our estimated budget, allowing us to shift hours among SMEs and staff depending on the specific needs of this engagement while still remaining under the budget cap.

- 8. The RFP contains a statement requesting that all communications with Parties be disclosed. To the extent you have had any communications, written or oral with either or both of the Parties or their consultants or experts before or after September 4, 2018 regarding the IM selection process or consent decree, please detail them. If your response to the RFP***

contained a statement regarding communications prior to September 4, 2018, there is no need to re-submit that information.

The chart below details all communications between members of the monitoring team and the Parties between July 27, 2018 (date RFP was released), and present, including the period after the proposal was due on September 4, 2018:

| Team member | Date | Participant(s) | Substance of Communication |
|----------------------|--|---|---|
| Terry Gainer | 9/22/18 | CPD Deputy Chief Kevin Ryan | These two individuals are professional and personal acquaintances and had a brief conversation at a parish event. The majority of the conversation had little to do with CPD in particular, but they did touch upon the type of work in which Mr. Gainer is engaged and he mentioned that he was a part of a team that had submitted a proposal for consideration as the monitor for Chicago. Mr. Gainer did not mention of the name of the team nor anyone involved other than himself. There was no specific mention of the consent decree beyond that. |
| Terry Gainer | 9/24/18 | CPD Deputy Chief Kevin Johnson | These two individuals are professional and personal acquaintances and had a brief conversation while they were both in Birmingham for a BJA symposium on violent crime. They spoke about a myriad of issues including, briefly, the consent decree. Mr. Gainer indicated that he was part of a team seeking to be named monitor. There was no discussion about the name of the team, nor any detailed conversation about the process. |
| Scott Decker | 8/6/18, 8/14/18-8/16/18, 8/27/18, 9/17/18, 10/1/18 | Larry Sachs Joseph Candella Kevin Johnson Jonathan Lewin Cheryl Robinson Dionne Riley Randolph Nichols | Dr. Decker participated on a site visit to Chicago for the Strategies for Policing Innovation (SPI) project. He observed a CompStat meeting, participated in a technology seminar, interviewed people in planning, did a ride-along, met with the staff in the 7th District, and observed a gun review in the 11th District. The purpose and agenda for this site visit was not related to the pending consent decree. Dr. Decker also regularly participated on SPI conference calls; see Dr. Coldren’s entry below. |
| James “Chip” Coldren | 8/6/18, 8/27/18, 9/17/18, 10/1/18 | Larry Sachs Joseph Candella Kevin Johnson Jonathan Lewin Cheryl Robinson Dionne Riley Randolph Nichols Lt. West (7 th District) | Dr. Coldren participated in phone calls on several of these dates with representatives from CPD, to monitor progress on CPD’s implementation of its Strategies for Policing Innovation (SPI) initiative. This call typically lasts 30 to 40 minutes, and Dr. Coldren participates in approximately one call per month. The purpose and agenda for this call is not related to the pending consent decree. |

9. *If any team members have government jobs and expect to retain those jobs during the term of the monitorship, please confirm that the team members' employment contracts or applicable employment policies permit outside work, and if required by their employer's policies or rules, that their employers are aware that they have applied to serve as the monitor or a member of the monitoring team in this matter.*

Chief Will Johnson of the Arlington, Texas, Police Department is the only member of our team who will retain his position during the term of the monitorship. He confirms that City Manager Trey Yelverton is aware of his participation on this team and has approved his participation for the amount of time reflected in the proposed budget.

10. *If any team members intend to maintain a full-time job during the term of the monitorship in a position that does not contemplate work on a client-by-client basis (i.e., consultant or firm attorney), please describe how the team member intends to manage his or her full time employment obligation simultaneously with his or her monitorship responsibilities and confirm that their employers are aware (or will be made aware) that they have applied to serve as the monitor or a member of the monitoring team in this matter.*

The members of the Monitoring Team that will maintain full-time jobs during the term of a monitorship have budgeted their time among their different commitments, allowing for effective participation on this team.

Chief Will Johnson of the Arlington, Texas, Police Department has been engaged in numerous projects over the past five years that are similar in nature to the current monitoring project and has successfully managed both his responsibilities as police chief and his responsibilities on project teams. Examples of similar projects include serving as a key team member for several US Department of Justice (DOJ) COPS Collaborative Reform Initiative projects, as well as serving as a subject matter expert for the DOJ. As noted in the answer to Question 9, Chief Johnson's supervisor, City Manager Trey Yelverton is aware of his participation on this team and has approved his participation for the amount of time reflected in the proposed budget.

Similarly, **Chief (Ret.) Bruce Johnson**, Chief Executive Officer of Nicasa Behavioral Health Services, has been engaged in numerous projects over the past five years that are similar in nature to the current monitoring project. He, too, has successfully managed both his responsibilities as the leader of Nicasa as well as his consulting and project team responsibilities. Examples of similar projects include acting as a subject matter expert or law enforcement trainer for engagements through the DOJ Bureau of Justice Assistance (BJA) Diagnostic Center and the development and delivery of BJA's national Crisis Intervention Team training curriculum. Chief Johnson is approved for secondary employment and the President of Nicasa's Board of Directors, Mr. Scott Roe, will be made aware of his commitment if selected.

Both **Julie Solomon** and **Dr. Rod Brunson** are full-time professors with positions in universities and enjoy considerable autonomy regarding how they meet their research,

teaching, and service responsibilities. For example, academics may “buy out” of a percentage of their responsibilities for teaching courses through winning consulting engagements or research grants, thereby freeing up their time to participate in such activities. Community engagement is an expectation for faculty and does not require preauthorization; universities allot time for field practice in order to stay relevant in the link between research and practice. Thereby, university flexibility permits the time to fully participate in this monitoring engagement. Professors are typically asked, however, to complete annual reports concerning their outside activities. Dr. Brunson and Ms. Solomon will do so at the appropriate times for their university employers.

11. Many provisions in the proposed consent decree require the development and/or maintenance of technology systems capable of capturing and analyzing data. To meet the obligations of the consent decree, the City may need to implement significant changes to its automated data systems. The monitoring team will be responsible to assess the adequacy of the upgrades and may need to provide technical assistance. Please detail the experience your team has with the implementation of processes to collect and analyze data. In your response, identify the specific team member(s) who have that experience and how that experience might be used during the term of the monitorship.

Many of our team members have experience with the implementation of processes to collect and analyze data. All of our team members with law enforcement experience, particularly those with experience as former chief executives of law enforcement agencies, have experience with implementing data systems (Monroe, Evans, Fuentes, Nila, Kerlikowske, W. Johnson, Stewart, B. Johnson, Gainer, Woodmansee, and McClelland). Other members of our team have provided technical assistance to law enforcement agencies for the procurement, implementation, and maintenance of data systems (Coldren, Rodriguez, Gainer, Decker, Christoff, and Rosenbaum).

The following paragraphs provide some specific examples of the relevant experiences of our team members:

Associate Monitor Scott Decker has extensive experience assisting police departments with the collection, management and interpretation of data. He has worked with agencies across the country over his 30-year career. For example, he was the Subject Matter Expert for the COPS Office’s monitoring the implementation of a new RMS in the San Diego Police Department as part of the Information System Technology Enhancement Program (ISTEP). He also worked with the Tempe, Arizona, Police Department on ISTEP. In addition, as a member of the Michigan State University National Training Team for Project Safe Neighborhoods, he developed and trained prosecutors, law enforcement, probation and parole and community groups in the collection of violence data. His expertise is based largely on measurement validation, performance assessment and crime related measures. In addition, he has led the annual Missouri Traffic Stop Analysis for the Missouri Attorney General since 2000.

Associate Monitor Dennis Rosenbaum has extensive experience working on data systems-related projects with the CPD, including leading the following projects:

Stops and racial profiling database: He examined databases kept by nearly 1,000 Illinois law enforcement agencies to assess disparities in stops and searches. Analyzed data to provide racial and ethnic breakdowns for the number of stops, reason for stops (e.g. moving violation, equipment violation, licensing/registration), outcome of stops (e.g. citation or warning), and consent searches. For each agency, he computed a ratio indicating the degree of racial and ethnic disparity in stops.

CLEARpath: He conducted a formative, process and impact evaluation of this unprecedented information system designed jointly by the CPD and community groups as: (1) a gateway for community involvement in diverse aspects of public safety in Chicago, (2) a citywide problem analysis and tracking system to facilitate community-level problem solving, (3) a mechanism for the police to share more crime-related information with community members, and (4) a mechanism to enhance communication among the police and various elements of the community. CLEARpath sought to increase police accountability and serve as a mechanism for building community capacities.

I-CLEAR: As a joint evaluation project between the University of Illinois at Chicago (UIC) and Northwestern University, he conducted a comprehensive evaluation of the CPD's Citizen and Law Enforcement Analysis and Reporting (CLEAR) information system. CLEAR was considered one of the most advanced, cutting edge information technology systems available to the law enforcement community, but it had yet to be fully implemented and formally evaluated. The research team evaluated the major applications of CLEAR as they were developed, refined and field-tested in Chicago neighborhoods. Organizational impact analysis focused on whether this new information system led to any "re-engineering" of the CPD; this evaluation also paid special attention to the highly visible criminal justice integration component of CLEAR, as law enforcement agencies began to share information in unprecedented ways to fight crime and terrorism in the region. Finally, this project involved a demonstration and evaluation project in three neighborhoods to explore the feasibility of an online community survey to collect new types of community data.

As part of the Settlement Agreement between the City of Portland and the United States Department of Justice, **SME Tom Christoff**, in coordination with the Portland Police Bureau, developed a two-phase force auditing system. The system ensures that all officer force reports and supervisor evaluations of force contain sufficient information for a comprehensive review of the force event. Additionally, the second phase of the audit examined whether the officer's actions were consistent with internal policies and constitutional standards. Upon implementation, Dr. Christoff monitored the Police Bureau's use of the system as required by the Settlement Agreement.

As part of his work with the Portland Police Bureau, Dr. Christoff also helped develop a mental health template to capture police interactions with persons in mental health crisis

and a data collection tool related to the Portland Police Bureau's Employee Information System (EIS). Dr. Christoff and the Portland Police Bureau used the data collection tools to monitor compliance and determine future courses of action in using data to help the Bureau become an evidence-based learning organization.

SME Terry Gainer also has a unique view of the CPD's efforts in data systems. In the fall of 2016, Chicago's homicide rate was on track to increase by 50 percent from 2015 and over 80 percent from 2014. This increase — unprecedented for a major U.S. city — was unevenly distributed across Chicago's 22 police districts. In particular, Districts 7 and 11, while each comprising just 2.6 percent of the city's population, accounted for almost 25 percent of Chicago's homicides in 2016. In response, the DOJ BJA assigned a small team of SMEs, including Chief Gainer to work with the Chicago Police Department and key stakeholders, notably the University of Chicago Urban Crime Lab and federal law enforcement partners, to reduce violent crime. BJA deployed a small, highly experienced and agile team of researchers and SMEs to assess the current state of readiness and the analytical capability of the Chicago Police Department to deal with the crime crisis. The members of this consulting team embedded themselves within the department to conduct their research and help department managers develop effective long term strategies to stem the violence and property crime increases the city has experienced. The team's intent would be to actively engage and support the senior management team of the police department in developing home-grown, dynamic, and innovative solutions through a collaborative process over a six-month period. In this unique role, Terry Gainer saw first-hand the CPD's development of its Strategic Decision Support Centers in Districts 7 and 11. His experience allows him a unique understanding of how CPD thinks about data, analyzes data and utilizes data in crime fighting.

Associate Monitor Will Johnson has extensive executive experience with law enforcement technology systems use, replacement, and growth. Will has transitioned a large policing organization from UCR to NIBRS; researched, procured and implemented a new record management system; implemented a special events management system; and implemented electronic ticketing systems. Finally, Will created and stood up a tactical intelligence unit within his department, which utilizes data systems.

12. What is your team's plan for gathering basic information about the Chicago Police Department and the status of its policing reform efforts at the outset of the monitorship?

Ms. Hickey has experience as the Executive Inspector General, with the U.S. Attorney's Office, and in private practice in leading teams to gather the information needed to assess CPD's policing reform efforts in an efficient and timely manner.

The Monitoring Team will employ the following methods and techniques to conduct this assessment work:

- Review the Chicago Police Consent Decree website and documents

- Analyze data that we will request from the CPD: organization charts, District maps, Area maps, budgets, technology overview, staffing plans and allocation, strategic planning documents, community policing plans, and the like
- Interview CPD leaders (Bureau Chiefs and above) and stakeholders — members of the Police Accountability Task Force, members of the Grassroots Alliance for Police Accountability, city council and county board members, US Attorney’s Office, Cook County Prosecutor’s Office, city legal department, and others
- Request and review Memorandums of Agreement (“MOA”) with certain community organizations that have established a broad-based community coalition (“Coalition”) committed to monitoring, enforcing, and educating the community about this Consent Decree ¶1669

In the technical assistance that the Monitoring Team conducts with several hundred police departments across the country, police agency assessments are a key component of that work. CNA conducts police agency assessments in a number of different areas (see below); these assessments serve several important purposes for advancing police agency transformation:

- They provide quantified baseline information with which to compare agency progress.
- They identify police agency strengths and gaps, thus providing a focus for agency technical assistance and improvement efforts.
- They provide the foundation for strategic planning efforts in various areas of concern.

The Monitoring Team routinely conducts police agency assessments in over a dozen different areas of police agency operations and administration, including, but not limited to, crime analysis and research, gang problems and gang intelligence, gun problems and gun violence reduction, technology, collaboration, officer-involved shooting investigations, integration of evidence-based policing in police operations, use of force, community policing engagements, critical incidents, media relations, social media strategy, and sustainability of policing innovations. Our assessment of CPD’s readiness for the mandates of the Consent Decree will draw upon these assessment protocols as appropriate, and the Monitoring Team will develop additional assessment protocols to cover such agency areas as police training, crisis intervention, officer recruitment and retention, and officer wellness and support.

Our proposal includes a description of our monitoring approach (pages 20-24), and we include a **Component 1: Prepare for Monitoring**. This component encompasses 5 distinct preparation activities: convene the Monitoring Team; establish a local office, website, and communications capability for the monitoring project; introduce the Monitoring Team to the City of Chicago, CPD leadership, and key personnel who will work with the Monitoring Team; establish a regular system of contacts and communication protocols among all entities involved in the monitoring process; and develop the Monitoring Plan with details for Year 1. The CPD assessment work we describe here will be included in the development of the monitoring plan, and we anticipate requiring approximately one month to complete the

assessment work (contingent upon CPD providing data requested by the Monitoring Team in a timely fashion; see above).

13. Please provide more information on the team's proposed monitoring methodology. Specifically, describe the team's:

- **Approach to the development of a monitoring plan and staging of monitoring activities/priorities;**
- **Establishment and measurement of compliance thresholds;**
- **Engagement and collection of information from all stakeholder communities;**
- **Sources of information/data/access; and**
- **Capacity to provide ongoing technical assistance.**

Approach to the development of the monitoring plan:

Dr. James "Chip" Coldren, in consultation with Maggie Hickey and Rodney Monroe, will lead the development of our monitoring plan. Our approach to developing the monitoring plan will include three key features: assessment, identification of strengths and gaps at CPD, and collaboration.

- **Assessment** – As explained above in Question 12, the Monitoring Team will undertake a comprehensive assessment of CPD operations and administration covering the key areas of responsibility under the Consent Decree. Through this assessment work, the Monitoring Team will identify specific areas in which the monitoring plan must address accountability responsibilities, and enhance our ability to develop recommendations for improvement that are focused, actionable, and realistically achievable.
- **Strengths and gaps** – This assessment work will provide the strategic focus needed to develop the details of the monitoring plan. It will identify progress toward reforms already implemented by CPD; personnel, technology, and other resource strengths that the Monitoring Team can rely on as the monitoring process unfolds; and the areas in which CPD is lacking in personnel, technology, and financial resources.
- **Collaboration** – Achieving the mandates of the Consent Decree will require involvement and collaboration among a number of different stakeholders, constituents, and community organizations. These include, but are not limited to, the Police Accountability Task Force, members of the Grassroots Alliance for Police Accountability, City Council and County Board members, US Attorney's Office, Cook County Prosecutor's Office, City Law Department, and a number of community organizations that have entered into MOAs pertaining to the Consent Decree. The Monitoring Team commits to providing these stakeholders and organizations opportunities to review and comment on the monitoring plan, and to responding to their inquiries and comments regarding the plan.

The staging of monitoring activities and priorities will be determined, in part, by the outcomes and findings of the CPD assessment tasks outlined above. For example, the

monitoring plan will prioritize areas where gaps and needs in technology and fiscal resources will slow or impede the work of the Monitoring Team so that the conditions for a complete and successful monitoring process are put in place early on. Monitoring activities will also be staged in such a way that the Chicago community has maximum opportunities to interact with the Monitor, Deputy Monitors, and Associate Monitors. We will schedule the work of the different compliance teams (Associate Monitors, Attorneys, and Subject Matter Experts) so that there are representatives from the Monitoring Team on-site in Chicago every month of each year. As noted in our proposal, monitoring team visits will occur every four months—more frequently if necessary — depending on the complexity of any specific monitoring task, on the progress CPD is making toward compliance, and on the type of monitoring activity. Our team visits may be staggered, with some Associate Monitors visiting at different times, depending upon scheduling considerations, such as CPD’s training calendars.

In addition, in the process of developing the monitoring plan, we will work with CPD, the parties to the Consent Decree, and our Community Engagement Team to prioritize the areas of responsibility under the Consent Decree that require the greatest and most immediate attention (for example, we may determine that such areas as Use of Force, Accountability and Transparency, and Officer Wellness and Support require more immediate attention in the plan than some of the other areas).

Establishment and measurement of compliance thresholds:

Our team will establish and utilize the following compliance thresholds when measuring progress and making determinations of compliance:

- **Primary Compliance:** CPD will achieve Primary Compliance with the consent decree requirements when it develops sound policies, procedures, rules, and regulations designed to achieve compliance. We will assess Primary Compliance by reviewing applicable policies, procedures, rules, and regulations, which will be judged by the reasonableness standard¹ and compliance with existing acceptable pattern and practice in the field.
- **Secondary Compliance:** CPD will achieve Secondary Compliance with the consent decree requirements when it has provided evidence of relevant training, supervision, internal audit and inspection designed to achieve, maintain, and monitor performance required by the standards set forth in the relevant Consent Decree paragraph.
- **Operational Compliance:** CPD will achieve Operational Compliance with the Consent Decree requirements when directives, policies, and training are followed in the agency’s day-to-day operations. In cases where directive are not followed, supervisors note, correct, and continue to supervise compliance activities. To achieve and maintain Operational Compliance, CPD must provide evidence that directives are

¹ By “judged by the ‘reasonableness’ standard,” we mean that we will ask whether CPD’s actions and achievements are objectively reasonable and designed to achieve the goals/objectives addressed by the relevant Consent Decree paragraph.

followed in its day-to-day operations, as supported by records kept in the *normal daily course of business*; “ad hoc” reporting will be insufficient.

In short, for each paragraph of the Consent Decree for which the monitoring team will measure compliance, Primary Compliance will indicate that a policy exists; Secondary Compliance will indicate that training, supervision, audit and disciplinary processes exist to ensure compliance; and Operational Compliance will indicate that the appropriate and required activities occur in the normal course of CPD business more than 95 percent of the time. Our measures of Operational Compliance aim to assess organizational change within the agency; assessing documentation from *normal daily course of business* is critical to this effort. Paragraphs will not be determined to be “in compliance” until all three levels of compliance are reached. The Monitoring Team will continue to measure compliance until, per ¶693, “the City has achieved full and effective compliance with this Agreement and maintained such compliance for no less than two consecutive years.”

One of our first courses of action will be to establish data protocols with the CPD, ensuring timely access to sources of data for the members of the monitoring team to access to measure compliance at all times. CPD currently has over 100 separate and distinct data systems, some of which are up-to-date and some of which are seldom used or updated regularly. We will work with CPD’s Office of Reform Management² to understand the complexities of how CPD utilizes each of their data systems, identify where and how the systems overlap, and establish a list prioritizing the monitoring team’s access points.

Engagement and collection of information from all stakeholder communities:

We will provide opportunities for stakeholder and community input on the monitoring plan through the Community Engagement Team (CET). The Monitoring Team will ensure that all stakeholder communities have multiple, varied options for engaging with the Monitoring Team and the monitoring process, as outlined below. A key aspect of our approach in the area of stakeholder engagement concerns the importance of, and our Team’s commitment to, creating opportunities for stakeholders to participate in settings and through processes that make them feel comfortable. Put simply, we will meet them where they are – in their communities, and at their meetings and events, not simply by making a website and central downtown office available. The following is a list of the opportunities the Monitoring Team will make available for engagement and collection of information from all stakeholder communities in the monitoring process:

- Development of a Monitoring Team website that will allow full-time access to all monitoring reports and materials, allow for comments and input from any community

² According to Consent Decree ¶ 677, “The City and CPD agree to hire, retain, or reassign current City or CPD employees to form a unit with the knowledge, skills, and abilities necessary to facilitate compliance with this Agreement.” While media reports have hinted at the establishment of an office of reform management within CPD (<https://chicago.suntimes.com/news/cpd-supt-eddie-johnson-adds-three-civilians-to-management-team/>), we have no independent verification of the office’s existence or details about how CPD will organize itself to implement Consent Decree requirements.

member in Chicago, and provide contact information for the Monitor, Deputy Monitors, and Associate Monitors.

- Periodic dissemination of explanatory materials about the Monitoring Team, the monitoring process, and Monitoring Team findings, via press releases, the outreach activities of our Community Engagement Team, and the Monitoring Team website;
- Scheduling of a series of bi-annual meetings with the entire Monitoring Team at various locations throughout Chicago.
- Scheduling of quarterly public meetings and forums in Chicago communities, coordinated by our Community Engagement Team.
- Periodic meetings and interviews by Monitoring Team members with leaders in key stakeholder organizations.

Sources of information/data/access:

The Monitoring Team will rely on multiple sources of information and data for its work. These include, but are not limited to the following:

- Any and all documentation provided by CPD, such as:
 - Policies and directives
 - Planning documents
 - Executive meeting minutes
 - Training plans, curricula, and evaluations
- Interviews and observations, such as:
 - Interviews with CPD leaders and external stakeholders
 - Observations, both formal (during meetings, training classes, community events, etc.) and informal (as the Monitoring Team members interact with CPD staff and leaders, patrol officers, community members, etc.)
 - Surveys of community members, police officers, and police union representatives
- Data collected by Associate Monitors and analysts from the files of various bureaus and divisions at CPD, in the process of compliance monitoring;
- Data collected from numerous automated data collection systems at CPD, such as:
 - Computer-Aided Dispatch, Record Management System, Arrest System, Personnel System, Internal Affairs, and more.

Regarding access to these various data sources, the Monitoring Team will adhere to all legal requirements regarding the confidentiality of CPD data, and will adhere to the requirements of an Institutional Review Board regarding the collection of data from human subjects. Where possible, the Monitoring Team will collect de-identified data to protect the identity of any individual whose personal information is retained in a CPD data system. When the Monitoring Team is required to collect information with personal identifiers included (e.g., when following up on particular issues regarding particular individuals, or when personal identifiers are needed to select and identify cases for compliance monitoring tasks), the Monitoring Team will maintain all such data in secure, password protected computer files,

and again, the Monitoring Team will comply with all laws and regulations regarding the protection of individual data.

Access to the data needed by the monitoring team will be determined by the result of several critical issues and processes, as follows:

- Response to surveys and survey questions, and to interview questions, will be, of necessity, voluntary. The Monitoring Team cannot mandate responses to survey and interview questions.
- Since most observations will be made in public places, and of police personnel doing their work in public places, access to such information will not present much of a problem. In instances in which the Monitoring Team conducts observations in non-public places, such as inside the police department, or in private meetings, access to such observations will depend on the voluntary participation of the subjects who will be observed.
- We do not anticipate problems with access to CPD policies, planning documents, meeting minutes, and other documents, as CPD will be operating under the Consent Decree.
- We do not anticipate problems regarding access to information from CPD's various databases and information systems, for the same reason. As noted above, the Monitoring Team will request and access deidentified information whenever possible.

Capacity to provide ongoing technical assistance:

The Monitoring Team provides technical assistance to over 300 police agencies across the country on an ongoing basis, and has done so for the past several years, supported by an internal team of over 20 researchers and operations analysts, as well as by a cadre of SMEs that numbers over 100 (20-25 of whom are active every month of the year). The Monitoring Team provides technical assistance to police agencies on a regular basis through a number of different technical assistance delivery mechanisms: websites, regular conference calls and phone contact, subject matter expert visits to police agencies, peer-to-peer visits between police agencies, in-person and on-line seminars and workshops, and development and dissemination of technical assistance products (such as collaboration guides, investigation checklists, policy review, cost calculators, and more). Communication and relationship-building are central to CNA's approach to providing technical assistance. Without regular and trusting communication between the agency and the provider, valid technical assistance needs are not likely to be identified and the provision of technical assistance is likely to fall short of its goals, or even prove wasteful or detrimental.

The Monitoring Team has a long, productive, and successful history of establishing trusting working relationships with police agencies, providing technical assistance to police agencies of different types and sizes, and covering a broad range of issues and topics (many of which are central to and supportive of the goals of police agency transformation and reform). We are confident that we can provide technical assistance to CPD that will increase the likelihood

that the goals and mandates of the Consent Decree will be met and the speed with which it makes progress toward this success.

14. Describe the distribution of work between the lawyers and the subject matter experts (SMEs) who will serve on your team, particularly between the division of responsibilities between the lawyers and the SMEs who have served in law enforcement.

Please see our answer to Question 3.

15. Please describe in greater detail the role and responsibilities of the Community Engagement Team, including the specific duties that will be performed by each member of the team and the scope of the work to be completed by the University of Illinois at Chicago. Your proposal indicates that the Community Engagement Team will be in Chicago 200 hours for each of two people and unspecified amounts of time for two SMEs. Please provide more detail about the tasks and activities these team members will conduct.

The CET serves several important purposes for our team:

- Assist the Monitors with access to community leaders and stakeholders city-wide, so we obtain information from all perspectives.
- Assist the Monitors with dissemination and translation of our work and findings to the diverse communities of Chicago.
- Assist with the coordination and convening of community forums, meetings, focus groups, and community surveys to gather additional information throughout the project.
- Assist the Monitor with being the “public face” of the Monitoring Team within Chicago’s diverse communities.

The members of our CET will interact regularly with a wide variety of stakeholders, including with the CPD’s CIT Advisory Committee (Consent Decree ¶128 – all of the following references to paragraphs refer to paragraphs in the Consent Decree), which will be chaired by the Mayor’s Office and may draw upon the resources of the City’s newly established Citywide Mental Health Steering Committee. Members of the CET will attend the Advisory Committees quarterly meetings to stay informed about Committee business and community member concerns regarding CPD’s responses to people with mental illness and people in crisis.

Members of the CET will also interact regularly with members of CPD’s Community Policing Advisory Panel (as noted in ¶12), District Advisory Committees, which will meet at least once every two months (per ¶25), and with CPD’s Office of Community Policing (created in 2017 per ¶13) to stay updated on its latest efforts and strategies (as noted in ¶28) and to gauge community responses to them.

The CET will be critical to the Monitoring Team’s compliance with ¶669 and ¶670. As noted in ¶669, “The Parties have entered into a Memorandum of Agreement (“MOA”) with certain community organizations that have established a broad-based community coalition (“Coalition”) committed to monitoring, enforcing, and educating the community about this Agreement. No less frequently than quarterly, the Monitor will participate in meetings with the Coalition, as provided in Paragraph 9 of the MOA.” The CET will engage with the Coalition and Monitor Maggie Hickey to ensure frequent and clear communications.

As noted in ¶670, “The Monitor will hold public meetings to explain the Monitor’s reports and inform the public about this Agreement’s implementation process, as well as to hear community perspectives on police interactions. The Monitor will notify the Parties in advance of the date, time, and location when such meetings are scheduled.” The CET will also assist the Monitor with these responsibilities, helping to schedule, organize and recruit attendees for all public meetings. Elena Quintana, Sodiqa Williams and Joe Hoereth have all agreed to host periodic meetings periodically at their institutions (Adler University, Safer Foundation, and UIC, respectively), and a host of community partners located throughout the city with which they are engaged. They will also assist in the planning and moderating of public meetings to explain the Monitor’s findings and reports, along with the findings of the periodic community surveys, to community members.

Our CET is a multi-disciplinary team on which some team members overlap with other roles and responsibilities on the Monitoring Team. Associate Monitor Stephen Rickman will be responsible for Section II of the Consent Decree as well as acting as a member of the CET. Mr. Rickman will assist with engaging communities across the city via email, phone and in-person meetings. Sodiqa Williams and Elena Quintana will be responsible for seeking out community input across the city, organizing community events, and maintaining contact with the CPD’s various community policing activities and structures. Joe Hoereth’s primary responsibility is to conduct the required community surveys, analyze the data, and present it to both the Monitoring Team and the diverse communities of Chicago; he will coordinate with Ms. Williams and Dr. Quintana regarding community events. SME Laura McElroy will provide technical assistance to the CPD regarding various media strategies as well as engage with communities and CPD’s community policing representatives to assist in facilitating connections and understanding.

For details about CET members’ specific tasks, please see **Table 2**.

16. For each team member, identify the number of hours and the percentage of time they will spend on each activity required for this project. What other professional commitments does each team member have? What percentage of their time will be spent on all other professional commitments?

Tables 1 and 2 in this document provide the detail required for this question. Our team members’ professional commitments and percentages of time spent on other professional

commitments can be found in our Independent Monitoring Proposal in Table 1, beginning on page15.

17. For Component II of your proposed Methodology, please describe the role community outreach and stakeholder collaboration will play in your ability to perform compliance reviews and audits.

Our compliance review and audit processes may often include interviews or conversations with community stakeholders to understand perceptions and experiences of the topic at hand. The CET will assist with connecting members of the monitoring team working on compliance reviews and audits at any given time with community members who have relevant experiences. It is important to note that in addition to our CET, we will also employ graduate research assistants at the University of Illinois at Chicago (through our partnership with Institute for Policy and Civic Engagement and the Survey Research Laboratory), who will be residents of the City of Chicago and will also provide valuable insights throughout the compliance review and audit processes.

18. If there are public reports for Monroe’s Meridian MS work, please provide them.

The *Final Compliance Report* of Chief Monroe’s work on the Meridian, Mississippi, Settlement Agreement is attached as **Attachment A**.

ATTACHMENT A

*City of Meridian, MS
Settlement Agreement
Civil Action No. 3:13-CV-978-HTW-LRA*

Final Compliance Report

***Independent Auditor:
Chief Rodney Monroe (ret.)***



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Below is the Auditor's final compliance report submitted to the Court, capturing the compliance levels of all substantive areas identified within the City of Meridian, MS and Department of Justice Settlement Agreement Civil Action No. 3:13-CV-978-HTW_LRA. The previous Compliance Report submitted June 2017, showed several areas of substantial compliance.

The June Compliance Report also identified the following areas requiring additional work to achieve substantial compliance:

- A certified training curriculum for Bias Free Policing identified and executed;
- Final distribution of GO-98-33, Internal Affairs Policy to all personnel;
- Community Forum Update;
- Ensuring a description of the MPD Citizen Complaint Process, and the Citizen Complaint Form are available on the Departmental website; and
- Public access to complaint filing process for citizen complaints.

During the past five months, the Meridian Police Department (MPD) has worked diligently to achieve substantial compliance in the above areas.

In October 2017, MPD personnel conducted training in Bias Free Policing. The training involved engaging participants in relationship building activities providing opportunities for candid discussion. The primary objectives for this training involved

- Acknowledging and accepting bias as a natural component of human diversity;
- Understanding and defining types of biases (implicit, explicit, suppressed, conditioned, etc.);
- Exploring how to recognize and accept responsibility for individual biases;
- Developing an awareness of how biases manifest themselves in the thoughts and behaviors of individuals; and
- Creating a personal commitment plan to continue individual development.

The training was conducted by certified trainers agreed upon by all parties and observed by both the Auditor and Department of Justice representative.

MPD distributed and trained officers on (through roll call training) General Order (GO) 98-033, Office of Internal Affairs Policy that addresses several key areas associated with Settlement Agreement to include the process for citizen complaints, and reporting and investigation of all complaints (including those emanating from School Based Arrest). In addition, the policy directs that officers assigned to the MPD Office of Internal Affairs (OIA) shall have the authority to receive and investigate all complaints associated with MPD members conduct within the Meridian Public Schools, including school-based arrests. The policy also addresses locations where citizens will have access to complaint forms. Complaint forms are expected to be available to citizens at all police facilities, City Hall, and on department website. Roll Call Training for MPD GO 98-033, was completed on June 1, 2017, and signature rosters were reviewed by the Auditor. MPD GO 98-033, also states the requirement for statistical information collection on citizen complaints be made public on the City's website on a semi-annual basis.

In May 2017, the Meridian City Council approved the Memorandum of Understanding agreed to by MPD and MPSPD. The MOU provides guidelines for MPD and MPSPDPD personnel's response to schools. The MOU prohibits MPD officers' response to schools for the purpose of handling non-criminal matters. Since the last Compliance Report, MPD continues to minimize their responses to schools and has not engaged in any arrest situations. In July 2017, the Meridian School Board approved the MOU. To date, each organization has honored and been in substantial compliance with no violations noted.

In October 2017, the City of Meridian, held its second Community Forum to engage citizens on MPD's progress in obtaining compliance with the Settlement Agreement. The forum was properly advertised via radio, newspaper, and the City of Meridian's website. In addition to citizens in attendance, the forum was also attended by Meridian's Mayor. Discussed during the forum were MPD's Action Plan for achieving compliance. A total of nineteen citizens were in attendance and a survey was distributed for citizens to comment. No citizens completed or returned the survey. The Auditor and a Representative from DOJ also attended the Community Forum.

The Auditor's final review also involved the continuous review of various reports to ensure continued compliance in other critical areas. The review period was from May 2017-December 14th, 2017, and included all calls for service to public schools, juvenile arrest records, custody orders, and citizen complaints. The Auditor's review did not detect any activity in violation of the Settlement Agreement. MPD remains in substantial compliance in all areas.

SUBSTANTIVE REMEDIAL MEASURES

School Arrests and Probable Cause

1. Policy and Practices

a. Within 90 days of the effective date, the Meridian Police Department shall have adopted practices, policies, procedures and training [regarding school-based arrest] consistent with the principles enumerated in Section III.A.1.a of the Settlement Agreement:

(i) Specifically, officers shall only conduct school-based arrests of juveniles under the following circumstances:

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in 2 nd Compliance Report) | Final Compliance Level | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|--|---|--|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | The City of Meridian had previously received a substantial compliance rating because it completed the MOU, which was presented to and approved by the Meridian City Council on May 16, 2017. At the time, however, the MOU still needed to be approved by the Meridian School Board. | Signed MOU between the Meridian Police Department and the Meridian Public Schools Police Department (MPSPD) | In July 2017, the Final MOU was approved by the Meridian School Board. | Signed MOU between the Meridian Police Department and the Meridian Public Schools Police Department (MPSPD) which has been approved by the City Council and the School Board (Appendix A) |

a. Officers have probable cause, to the extent required by law, to believe that a juvenile has committed a felony; or

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance Level | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | All responses continue to be compliant with Settlement Agreement Provisions and no arrests have been made. No additional tasks necessary for this report. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

b. A criminal offense that involves a real and immediate threat to students, teachers, or public safety; or

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | All responses continue to be compliant with Settlement Agreement Provisions and no arrests have been made. No additional tasks necessary for this report. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

c. A misdemeanor or other indictable offense occurs in the officer's presence, except for offenses identified in (iii)(a); or

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | All responses continue to be compliant with Settlement Agreement Provisions and no arrests have been made. No additional tasks necessary for this report. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

d. A judicial warrant or custody order specifically directs the arrest of a student in a school.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | All responses continue to be compliant with Settlement Agreement Provisions and no arrests have been made. No additional tasks necessary for this report. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

(ii) Officers shall avoid executing a judicial warrant at a school. A felony warrant may be executed at a school when it is not practical to conduct the arrest at alternative locations.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|---|
| Non - Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | All responses continue to be compliant with Settlement Agreement Provisions and no warrants were served and no arrests have been made. No additional tasks necessary for this report. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

(iii) Officers shall not respond to requests for school-based arrests for behavior that is appropriately addressed as a school discipline issue, including incidents involving:

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | No responses to school discipline issues were made by MPD officers in compliance with Settlement Agreement Provisions. No additional tasks necessary for this report. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

- a. Public order offenses including disorderly conduct, disruption of schools or public assembly, trespass, loitering, profanity, dress code violations, and fighting that does not involve serious physical injury or a weapon.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|-----------------------|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Auditor reviewed MPD arrest reports and juvenile custody orders from May 2017 - December 2017. | All responses continue to be compliant with Settlement Agreement Provisions and no warrants were served and no arrests have been made. No additional tasks necessary for this report. | None. |

b. Officers must document in sufficient detail the basis for any school-based arrest, including any factors that justify arresting the youth at school and factors that support a determination of probable cause:

(i) Officers must provide Miranda warning as soon as a juvenile is placed in a situation where a youth, based on the youth's mental and psychological maturity, would reasonably believe they are free to leave.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report)* | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|--|-------------------------------|---|--------------------|--------------------------------------|-----------------------|
| Non-Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report. | None. |

(ii) Officers must notify the juvenile's guardian of the arrest as soon as practicable, generally no more than three hours after the arrest. If a parent is not notified within three hours, the arresting officers must document, in writing, the reason for the delay.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report)* | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|--|-------------------------------|---|--------------------|--------------------------------------|-----------------------|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report. | None. |

(iii) Officers shall only interview a detained youth in the presence of the juvenile's guardian or attorney.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--------------------|--------------------------------------|-----------------------|
| Partial Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report. | None. |

2. Training

- a. Within six months of the effective date, Meridian Police Department shall provide officers with pre-service and annual in-service training regarding interactions with juveniles while on Meridian Public School District premises, including de-escalation techniques, conflict resolution, child and adolescent development, and age appropriate responses and bias-free policing.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|--|--|--|--|
| Partial Compliance | Partial Compliance | Substantial Compliance | <p>Identification of trainer and development of training curriculum for bias-free policing.</p> <hr/> <p>Implementation/execution of de-escalation, conflict resolution & child and adolescent development training.</p> | <p>Reviewed Bias-Free Policing Training Curriculum.</p> <p>Bias-free Policing Trainings held October 24-25, 2017.</p> <hr/> <p>Observed de-escalation, conflict resolution, and child and adolescent development trainings held July 13 and 14, 2017.</p> <p>Officer attendance for all training was documented.</p> | <p>Training curriculum for bias-free policing was developed, qualified trainers identified, and training conducted.</p> <hr/> <p>Training for de-escalation, conflict resolution, and child and adolescent development has been conducted.</p> | <p>Curriculum Vitae for Jenifer Davis & R. Dwayne Burks – Bias-Free Policing Training Providers (Appendix C)</p> <p>Training Proposal provided for Bias-free Policing Trainer (Appendix D)¹</p> <hr/> <p>Signature Rosters for IA Roll Call Training and Bias-Free Policing Training (Appendices E)</p> |

¹ While the training for these classes are proprietary, the Auditor and DOJ observed and approved actual training.

b. This training shall be conducted by qualified instructors.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report)* | Current Compliance | Tasks Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|--|-------------------------------|---|--|---|---|
| Non-Compliance | Partial Compliance | Substantial Compliance | Identify a qualified trainer & curriculum for Bias Free Policing training. Training held on October 24-25, 2017. | Reviewed Training Curriculum. Observed trainings for all and documented officer attendance. | Training curriculum for bias-free policing developed and qualified trainers identified. | Curriculum Vitae for Jenifer Davis & R. Dwayne Burks - Training Providers (Appendix C) Training Proposal provided for Bias-free Policing Trainer (Appendix D) ² |

c. MPD shall provide roll call trainings regarding these policies as needed.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report)* | Current Compliance | Tasks Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|--|-------------------------------|---|---|---|--|
| Non-Compliance | Partial Compliance | Substantial Compliance | Completion of Roll Call training for MPD GO 98-033. | Signature Rosters for IA policy Roll Call training (MPD GO 98-033). | Roll Call Training for MPD GO 98-033 has been sufficiently completed on June 1, 2017. | Signature Rosters for IA Roll Call Training and Bias-Free Policing Training (Appendices E) |

² While the training for these classes are proprietary, the Auditor and DOJ observed and approved actual training.

d. MPD shall document that all officers have received the required training.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--|--|--|
| Non-Compliance | Partial Compliance | Substantial Compliance | <p>Execution of MPD GO 98-033 (IA Policy) Roll Call training and review of signatures.</p> <p>Execution of De-escalation, Conflict Resolution, Child & Adolescent Development Training and review of logs by Auditor.</p> <p>Identification of trainer, execution of and review of logs for Bias-free policing training by Auditor.</p> | <p>Class rosters and attendance records have been inspected for all participants attending roll call training on revised IA Policy (MPD GO 98-033); De-escalation; Conflict Resolution; Child & Adolescent Development; and Bias-free policing classes.</p> <p>Auditor and DOJ attended trainings in June 2017 and October 2017.</p> | <p>Execution of bias-free policing training by qualified trainers and documentation of officer training has been completed.</p> <p>Execution of De-escalation, Conflict Resolution, Child & Adolescent Development Training and documentation of officer training has been completed.</p> <p>Development and execution of roll call training for revised IA policy (GO 98-033) and documentation of officer training has been completed.</p> | Signature Rosters for IA Roll Call Training and Bias-Free Policing Training (Appendix E) |

3. Civilian Complaints & Discipline.

1. Within six months of the effective date, MPD shall ensure that an effective process is in place to consider complaints regarding MPD conduct in the schools, including school-based arrests. MPD shall ensure that community members, including students, parents and guardians, have access to complaint forms to express concerns about MPD. To achieve this outcome, MPD shall ensure that complaint forms are available from the MPD and at City Hall, public libraries, and police stations. MPD shall also make the complaint form available on its website and work with MPSD to make forms available in schools.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--------------------|--------------------------------------|-----------------------|
| Non-Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report. | None. |

2. MPD shall specifically track complaints arising from school-based arrests.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--------------------|--|-----------------------|
| Non-Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report, as no school-based arrests were made during the reporting period. | None. |

3. MPD shall routinely assess the need for improvements to its training based on these complaints.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--------------------|--|-----------------------|
| Non-Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report, as no school-based arrests were made during the reporting period. | None. |

4. Officers who violate MPD’s juvenile arrest policies shall be held accountable through the department’s disciplinary system.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--------------------|--|-----------------------|
| Non-Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | None. | No review necessary for this report, as no school-based arrests were made during the reporting period. | None. |

4. Data Collection.

a. MPD shall collect statistical data on the number of juveniles referred to the MPD by the MPSD and the number of arrests that arise out of behavior allegedly occurring in the Meridian public schools or at school events, including age, race, gender, and alleged misconduct

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|------------------------|---|---|--|---|
| Non-Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | MPD Arrest Reports & Juvenile Custody Reports (May 2017- December 2017) were reviewed by the Auditor. | No MPSD referrals or school-based arrests were made during the reporting period. | MPD Calls for Service, Arrest Reports & Juvenile Custody Orders (May 2017 – December 2017) (Appendix B) |

b. This data shall be made public on the City’s website on a semi-annual basis.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|-------------------------------|---|--------------------|--|--|
| Non-Compliance | Non-Compliance | Substantial Compliance | Compile data and place online at least semi-annually. | MPD Website | GO-98-033, VII-2, states: “The statistical information contained in the reports shall be made public on the City’s website on a semi-annual basis.” The Compliance Report is currently posted on the City’s website and discusses arrest and referral data. | Action Plan and Compliance Report. Also found at http://www.meridianms.org/city-departments/police/ |

5. Coordination with Meridian Public School District Police Department.

- a. Consistent with paragraph 92 of the MPSD/EOS Agreement, within 90 days of the effective date, the City shall seek a Memorandum of Understanding (MOU) between the MPSDPD and the MPD that delineates authority and specifies procedures for effectuating arrests of students while on school grounds.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|------------------------|---|--|---|---|
| Partial Compliance | Substantial Compliance | Substantial Compliance | The MOU should be modified and signed by both parties. ³ | The MOU between the Meridian Police Department and the Meridian Public School District Police Department (MPSPD) | Final MOU was approved by the School Board in July 2017. MOU has been signed by both parties. | Signed MOU between the Meridian Police Department and the Meridian Public Schools Police Department (MPSPD) which has been approved by the City Council and the School Board (Appendix A) |

³ Recommendations were made by the Auditor on items to include in the MOU.

A. Within six months of the effective date, the City, in consultation with the Police Independent Auditor and the United States, shall develop and implement a community input program to keep the community informed about the progress of its reforms as outlined herein and to hear ongoing community questions and concerns regarding the implementation of this Settlement Agreement. The community input program shall include a process for receiving and responding to input from interested members of the community.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|------------------------|--|--------------------------|--|-----------------------|
| Non - Compliance | Substantial Compliance | Substantial Compliance | Develop community input framework, action plan, and identify participants (to include police, city representatives, and DOJ) for the open community meeting and hold open community meeting. | MPD Community Input Plan | The Community Input Plan referenced in June 13, 2017 compliance report is compliant with Settlement Agreement and remains in effect. | None. |

B. The community input program shall require at least one open community meeting every six months for the duration of this Agreement. A representative for the City shall be required to attend the open meeting so long as this Agreement is in place. A representative for the US will also attend. The open meetings shall inform the public about the requirements of this Agreement, the City’s progress in each substantive area of the Agreement, and address community concerns related to the implementation of this agreement. The meetings shall be held in a location that is accessible to the public. At least one week before the open meetings, the City shall widely publicize the meetings using print media, radio, and the Internet.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Formerly Identified as Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|------------------------|---|--|--|--|
| Non - Compliance | Substantial Compliance | Substantial Compliance | No additional tasks necessary. | Attended MPD Community Input Forum. Reviewed signature log. | The MPD and the City conducted the second Community Forum for citizens on October 26, 2017. The forum was attended by several citizens to hear updates from the City and police department. Information was shared as it relates to their progress towards substantial compliance with the Settlement Agreement. The meeting was properly advertised via radio, print media, and city website. An agenda was available to all citizens along with a survey for citizens to share their understanding and views. | Public Notice (in Meridian Star) of Meridian Police Department Community Meeting held on October 26, 2017 (Appendix F) |

C. The community meetings shall include summaries of the Action Plan and Compliance Reports required by this Agreement during the period prior to the meeting and any policy changes or other significant actions taken as a result of this Agreement. The City shall make any written summary of policy changes or other significant actions taken as a result of this Agreement publicly available on a public website they create or maintain.

| Compliance Level (as stated in the 1 st Compliance Report)* | Compliance Level (as stated in the 2 nd Compliance Report) | Current Compliance | Tasks Needed to Come into Compliance | Materials Reviewed | Current Review/Status/Findings | Support Documentation |
|--|---|------------------------|---|---|---|--|
| Non - Compliance | Non - Compliance | Substantial Compliance | <p>Develop Action Plans and make Compliance Reports, revised policies, training curriculum, MOU and other materials developed under this agreement available during community meetings and in public locations.</p> <p>While the community survey was a step in the right direction, the MPD has not regularly made action plans, compliance reports, revised policies, training curriculum, MOU or other materials developed under this agreement accessible to the public via the Internet or paper copies.</p> | Auditor reviewed the Action Plan and Compliance Report. | <p>The Second Community Forum was held October 26, 2017.</p> <p>The MPD Action Plan and Compliance Report (which contained copies of all materials developed under this Agreement) were made available to citizens during the Community Forum.</p> <p>The Action Plan and Compliance Report was also made publicly available on the City's website.</p> | Action Plan and Compliance Report. Also found at http://www.meridianms.org/city-departments/police/ |

The City of Meridian and the Meridian Police Department has achieved Substantial Compliance in all substantive areas of the Settlement Agreement.

On December 14, 2017, a final conference call was held with all parties to discuss and review the Auditor's preliminary Final Compliance Report. All parties were in agreement that the City and MPD had achieved substantial compliance in all areas of the Settlement Agreement. In addition, all parties agreed to move to DOJ Monitoring over the next one-year period. Because of the Auditor's familiarity and history with this case, the Auditor and parties have further agreed that the Auditor will stay on as the United States' consultant and assist in assessing the City's compliance efforts during the one-year period.⁴ A self-reporting document has been developed and provided to the Meridian Police Department to be used for Meridian Police Department to update and submit quarterly throughout 2018. The report will continue to capture compliance levels in all substantive areas of the Settlement Agreement. DOJ will also attend the June 2018 and December 2018 community input meetings, and reserve the option to conduct an in-person review of any relevant MPD documentation during that trip.

⁴ See Settlement Agreement Section V.F. The Settlement Agreement requires that the City maintain substantial compliance with all of its substantive provisions for 12 consecutive months before the Agreement can be terminated. See Settlement Agreement at Section VII.B.1.

Each provision within the settlement agreement has been given a compliance assessment rating ranging from non-compliance to substantial compliance, as defined below.

- **Non-compliance** - The MPD has made no notable progress in achieving compliance on any of the key components of the provision.
- **Beginning compliance** - The MPD has made notable progress in achieving compliance with a few, but less than half, of the key components of the provision.
- **Partial compliance** – The MPD has made notable progress in achieving compliance with the key components of the provision, but substantial work remains.
- **Substantial compliance** - The MPD has met or achieved all or nearly all the components of a particular provision.

- Appendix A:*** Signed MOU between the Meridian Police Department (MPD) and the Meridian Public Schools Police Department (MPSPD) - approved by the City Council and the School Board
- Appendix B:*** MPD Arrest Reports, Juvenile Custody Orders, and Calls for Service* (May 2017 – December 2017)
- Appendix C:*** Curriculum Vitae for Jenifer Davis & R. Dwayne Burks – Bias-Free Policing Training Providers
- Appendix D:*** Bias-Free Policing Training Proposal
- Appendix E:*** Signature Roster for Roll Call Training on MPD GO 98-033 IA Policy and Bias-Free Policing Training*
- Appendix F:*** Public Notice (in Meridian Star) of Meridian Police Department (MPD) Community Meeting held on October 26, 2017

***All items noted with an asterisk in the Appendices above contain sensitive information, and may be made available to the Court upon request.**

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OMAN
A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS
ALLIANCES IN MEXICO
AND SRI LANKA

October 11, 2018

VIA E-MAIL

Ms. Margaret A. Hickey
Schiff Hardin
233 S. Wacker Drive
Suite 7100
Chicago, IL 60606

Re: Chicago Police Consent Decree Independent Monitor Selection Process

Dear Ms. Hickey:

Thank you for your submissions in response to the Request for Proposals issued jointly by the Office of the Illinois Attorney General and the City of Chicago and your ongoing interest in serving as the Independent Monitor. We would like to provide some additional information regarding the next phase of the process.

We will notify those teams who have advanced to the finalist stage during the week of October 15. Please be advised that all finalists will be required to submit an answer to the following question in writing on or before October 26.

Please advise if any team member has:

- *Been terminated from employment or a consulting contract, or resigned from employment, a consulting contract, or a professional board or organization because of a report or allegation of misconduct;*
- *Been accused or adjudicated to have engaged in professional misconduct (for attorneys, only report sustained complaints to the Bar); or*

DUANE MORRIS LLP

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Ms. Margaret A. Hickey
October 11, 2018
Page 2

- *Been sued for professional or employment related actions and the case was settled, either by the member or an employer of the member, or adjudicated.*

Your written responses should be submitted in electronic format (PDF) and emailed to LTScruggs@duanemorris.com and to the City at Aslagel@taftlaw.com. Please include “City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information” in the email subject line. If you have any questions or concerns regarding your ability to provide a response, please contact Lisa and Allan before October 17 to schedule a mutually convenient time for discussion.

Sincerely,

Lisa T. Scruggs
For the Office of the Attorney General
For the State of Illinois

Allan T. Slagel
For the City of Chicago

LTS/saw

City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information

Schiff
Hardin

CNA
ANALYSIS & SOLUTIONS

Requested Oct 11, 2018

October 26, 2018

Submitted to:

Lisa T. Scruggs
Special Assistant Attorney General
via email to LTScruggs@duanemorris.com

Allan T. Slagel
Counsel for the City
via email to ASLagel@taftlaw.com

Submitted by:

Schiff Hardin LLP
Margaret Hickey
Partner
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606

| | |
|--|---|
| <p>Other than those noted below, all team members report that they can answer “no” to each of the questions asked. As likely was expected, some of the members of the team who have served in law enforcement have been named as parties to litigation, though none believes their involvement in past or current litigation would be an issue in performing as part of the team. We would be happy to discuss details related to any of the team members.</p> | |
| <p>Please advise if any team member has:</p> <p>Been terminated from employment or a consulting contract, or resigned from employment, a consulting contract, or a professional board or organization because of a report or allegation of misconduct;</p> | |
| All Schiff Hardin – CNA Team Members | Does not apply |
| <p>Been accused or adjudicated to have engaged in professional misconduct (for attorneys, only report sustained complaints to the Bar); or</p> | |
| All Schiff Hardin – CNA Team Members | Does not apply |
| <p>Been sued for professional or employment related actions and the case was settled, either by the member or an employer of the member, or adjudicated.</p> | |
| Rodney Monroe | Rodney Monroe, as the Chief of the Charlotte Mecklenburg Police Department, was sued in his official capacity numerous times. We would be happy to discuss in further detail. |
| Paul Evans | Paul Evans, as the Police Commissioner of the Boston Police Department, was sued in his official capacity numerous times. We would be happy to discuss in further detail. |
| Gil Kerlikowske | Gil Kerlikowske, as the Chief of the Seattle Police Department and Police Commissioner of Buffalo, was sued in his official capacity numerous times. We would be happy to discuss in further detail. |
| Will Johnson | Will Johnson was sued as an individual while employed as the Arlington, Texas police chief, for the conduct of one of his officers related to an allegation of improper use of force. The case was dismissed with prejudice. |
| Scott Decker | Scott Decker was named in a lawsuit by a student in 2013 at Arizona State University. An internal investigation ensued. He was subsequently dismissed from the suit, the suit was then settled, and he was not a party to the settlement. |
| Terry Gainer | Terry Gainer, in his roles with the Illinois State Police, Metropolitan Police Department of the District of Columbia, and the U.S. Capitol Police, was sued in his official capacity numerous times. We would be happy to discuss in further detail. |

| | |
|----------------|---|
| Tom Woodmansee | Tom Woodmansee, as the Director of the Madison, Wisconsin Police Academy, was named in two suits (along with other defendants) by offenders. The first suit was dismissed and a second suit is still active. |
| Rob Brunson | NO LONGER PART OF THE TEAM - Professor Brunson has assumed responsibility for several weighty research projects since agreeing to participate as part of this team, and as a result, he has regrettably withdrawn from this endeavor. His proposed responsibilities will be covered by other team members. |
| Rick Fuentes | NO LONGER PART OF THE TEAM - Rick Fuentes has withdrawn from the Schiff Hardin-CNA team and his proposed responsibilities will be covered by other team members. |

City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information

Questions Posed Oct 22, 2018

October 29, 2018

Submitted to:

Lisa T. Scruggs
Special Assistant Attorney General
via email to LTScruggs@duanemorris.com

Allan T. Slagel
Counsel for the City
via email to ASLagel@taftlaw.com

Submitted by:

Schiff Hardin LLP
Margaret Hickey
Partner
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606

Schiff
Hardin

CNA
ANALYSIS & SOLUTIONS

Schiff Hardin-CNA Responses to Questions from the Parties on 10/22/18

1. Please explain your team's organizational structure, especially regarding how such a large team will avoid inefficiencies and silos within the team. How can such a large team be efficient and effective?

Our Lead Monitor Maggie Hickey has experience both in the private and government sectors leading large teams that have individual assignments that are part of an overall organizational transformation. She has the knowledge and expertise to weave the individual team members into a cohesive unit to work efficiently and collaboratively to achieve the goals set out in the Consent Decree. Since the Chicago Police Department is nearly 12,000, in our experience the size of our proposed team is what is needed to address numerous issues addressed in the Consent Decree.

It is important to note that the “core” of our team includes: Monitor Hickey, Deputy Monitors Monroe and Coldren, 10 Associate Monitors, the Community Engagement Team (including the research team from UIC IPCE and SRL), and the analysts. The Subject Matter Experts and attorneys from Schiff Hardin (Barella, Sepúlveda and DeCarlo) are “adjunct” experts, to be utilized as needed during the monitoring process; they are not “key” personnel. They will be available as needed and have smaller roles overall, as reflected in our budget. Subject matter experts will be called upon from time-to-time to assist Associate Monitors with specific tasks such as policy review or technical assistance provision. They will not assume responsibility for making compliance determinations for the paragraphs of the Consent Decree; the Monitoring Team’s leadership (Monitor and Deputy Monitors) along with the Associate Monitors will make those assessments and determinations. Specifically, Schiff Hardin attorneys Derek Barella, Meredith DeCarlo, and Anthony-Ray Sepúlveda will support Ms. Hickey as lead monitor and final team arbiter on compliance issues. Mr. Barella has a wealth of knowledge in labor and employment laws, including collective-bargaining issues at police departments and the enforcement of consent decrees. Ms. DeCarlo and Mr. Sepúlveda have significant experience working with law enforcement and in government accountability and transparency. Mr. Barella, Ms. DeCarlo, and Mr. Sepúlveda will use their experience to provide subject-matter expertise, legal analysis and report writing.***2. Please explain the relationship between the Community Engagement Team (CET) and the core monitoring team. How will it work on a day to day basis, and what is the proposed cohesive strategy for the CET's involvement in the monitoring process?***

The CET serves several important functions for our team, including but not limited to:

- community engagement and outreach
- disseminating information about the monitoring process to Chicago’s communities
- providing entree to communities across Chicago so the Monitoring team can hear directly from community leaders and community members
- convening community meetings, forums, and other events on a regular basis (per the requirements noted in the Consent Decree, such as in paragraphs 12, 13, 25, 128, 669 and 670), to further support the Monitoring team’s interaction with Chicago communities.

The CET will focus on transparency, so that Chicago communities understand the monitoring process, the Monitoring Team's activities, how the team makes determinations of compliance and how those findings are reflected in official reports to the Judge.

We have noted that the Monitoring Team Leadership (Hickey, Monroe, Coldren) will have calls with the Parties every other week; we will also convene **core team conference calls** every other week (to include the Monitoring Team Leadership, Associate Monitors, the CET, and the analysts) and **CET conference calls** weekly (to include Deputy Monitor Coldren, Associate Monitor Rickman, Associate Monitor Solomon, Sodiqa Williams, Elena Quintana, Laura McElroy, Joe Hoereth, and other UIC staff members when necessary). Day to day, Deputy Monitor Coldren and Associate Monitor Rickman will communicate frequently with Williams, Hoereth, Quintana and McElroy, especially when planning events, community meetings and interactions with the community.

3. How will our team address legacy IT system migration? In summary, CPD has old records systems; how will we address the problem of information system modernization?

CNA has considerable experience with modernization of legacy IT systems, having performed such services for large-scale military clients such as the Federal Emergency Management Agency (FEMA), the Federal Aviation Administration (FAA), and the United States Marine Corps (USMC). CNA supported project and transition planning, business process reengineering and requirements analysis, stakeholder engagement planning, and data analyses to support large scale modernization efforts in these agencies. For example, CNA led multiple projects in support of the FAA, including the Aeronautical Information Services (AIS) Production Workflow System modernization effort to streamline and modernize the Instrument Flight Procedure development workflow and the Federal Notice to Airmen (NOTAM) System (FNS) modernization effort to improve the origination, management, and distribution of dynamic aeronautical information through the transition from legacy to digital NOTAMs. Our scientists performed a detailed analysis and review of the United States NOTAM System (USNS) functions, processes, and interfaces through documentation and code analysis as well as interviews with subject matter experts. CNA developed an in-depth understanding of all current USNS functionality such that it was replicated on the FNS environment in preparation for shutting down USNS. Based on the analysis, detailed requirements, workflows, and supporting documentation were created to guide the development of the functionality in the FNS. This experience, coupled with CNA's experience working with police agency information systems in multiple agencies, insures that CNA has the experience required to support the Chicago Police Department in its information system modernization goals.

4. Can we demonstrate that Police Chief Will Johnson will have the time and flexibility in his schedule to commit to the monitoring work required?

If we are fortunate enough to be the Monitoring Team, Chief Johnson will work only on this project and forgo any other additional work projects for the duration of the consent decree monitoring project.

5. Please note that Dr. Rick Fuentes is no longer part of our team.

6. Upon reviewing the answers to the legal questions we submitted last Friday (10/26/18), we have one addition:

Mr. Giaquinto, as the county prosecutor of Mercer County, NJ, was sued in his official capacity numerous times. We would be happy to discuss in further detail.