IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

THE CENTRAL AUSTIN NEIGHBORHOOD ASSOCIATION and THE AMERICAN CIVIL LIBERTIES UNION OF ILLINOIS,	)))))	No. 2011 CH 37299
Plaintiffs,	))	Hon. Neil H. Cohen
v.	)))	
THE CITY OF CHICAGO,	))	
Defendant.	)	

PLAINTIFFS' MOTION FOR A DISCOVERY SCHEDULE

Plaintiffs, the Central Austin Neighborhood Association ("CANA") and the American Civil Liberties Union of Illinois, move for a case management schedule which allows for discovery to commence forthwith and requires written fact discovery to be complete by September 15, 2014 and oral fact discovery to be complete by October 15, 2014. In support of this motion, plaintiffs submit the following reasons:

1.   The City has informed plaintiffs that it intends to file another motion to dismiss and seek a stay of discovery pending the resolution of that motion. However, if the Court allows discovery to proceed, the parties agree that written fact discovery is to be completed by September 15, 2014 and oral fact discovery is to be completed by October 15, 2014.

2.   Plaintiffs filed this case on October 27, 2011, alleging adverse disparities in police response to 911 calls in predominantly African American and Hispanic neighborhoods ("minority neighborhoods or districts"[1]) as compared to predominantly white neighborhoods

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[1] Minority neighborhoods or districts are neighborhoods and districts where African Americans and/or Hispanics comprise the majority of residents.

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("white neighborhoods or districts"[2]). Compl. ¶ 1. For example, in Chicago Lawn, a minority neighborhood, no officer was available to respond to 911 emergency calls at least 52 times more often than in Town Hall, a white community, for the same time period. *Id.* ¶ 24. This disparity is caused by the City's method of deploying police officers to districts throughout the City. *Id.* ¶ 53. The City's deployment policy has a disparate impact on minority districts in violation of the Illinois Civil Rights Act, 740 ILCS 23/5. *Id.* ¶ 56.

3.   Defendant, the City of Chicago ("the City"), moved to dismiss on several grounds and moved for a stay of discovery. This Court granted the motion to dismiss on political question grounds and found the motion for a stay of discovery moot upon dismissal.

4.   The First District reversed the dismissal, finding that plaintiffs' claim does not present a non-justiciable political question. *CANA v. City of Chicago*, 2013 IL App (1st) 123041.

5.   The appellate court also emphasized the need for discovery. *Id.* ¶ 14. On appeal, the City asked the court to take judicial notice of academic studies and reports by government bodies regarding its justification for the method of police deployment. The court refused to do so, stating that if it reversed, ***"the plaintiffs will have a right to discovery***, so that they will have an opportunity to dispute the factual conclusions the City reaches on the basis of the reports and studies it cites." *Id.* (emphasis added). The appellate court declined to review the documents proffered by the City because the City was seeking to justify its deployment procedures "without allowing the plaintiffs the opportunity to conduct discovery that could show the full scope of the disparate impact and counter the City's evidence of justification." *Id.* It observed that "the plaintiffs have the right to discovery on the issue of the extent of the disparate impact of administrative procedures as well as justification for those procedures." *Id.* ¶ 27.

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[2] White neighborhoods or districts are neighborhoods and districts where whites comprise a majority of residents.

6.   The need for discovery is urgent. During the appeal, plaintiffs gathered evidence

through Freedom of Information Act requests that shows continuing and significant disparities in

response times. This evidence includes disparities in the average amount of time from the receipt

of a call by the Office of Emergency Management and Communications until an officer is

dispatched in response ("dispatch times"). *See* Ex. 1 (summarizing the data). But the City has

refused to provide data on how long it takes between the time the call is assigned and the time an

officer actually arrives at the caller's location. Plaintiffs have also gathered recent data on the

number of field officers assigned per district, the number of violent crimes per district, and the

number of 911 calls per district, including Priority 1 calls. *See* Ex. 2 and 3 (summarizing the new

data). Priority 1 calls involve an immediate threat to a person's life or property. Compl. ¶ 29.

7.   There continue to be wide disparities between districts in the average dispatch

times. *See* Ex. 1. Although the City refused to identify the districts associated with the average

dispatch times (Ex. 4), it may reasonably be assumed that the data was produced in numerical

order of the numbers assigned to districts.[3] *Id.* If this assumption is mistaken, plaintiffs

encourage the City to so inform the Court. If the assumption is correct, the data shows that

minority districts generally suffered longer dispatch times than white districts. Ex. 1. For

example, in July 2013, Grand Crossing, a minority neighborhood, had an average dispatch time

of 10 minutes, 41 seconds for Priority 1 calls; in contrast, Jefferson Park, a white neighborhood,

had an average dispatch time of 2 minutes, 26 seconds. *Id.* Thus, the dispatch time was 4.4 times

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[3] In 2012, three districts (Prairie, Belmont, and Wood) were consolidated with other districts. Ex. 5 (Alisa Hauser, "End of Era at Wood Street Station as Police Head South, Report to New Brass," DNAinfo.com, Dec. 18, 2012; Jon Seidel, "Top cop explains police station closings as critics question savings," Sun-Times, March 3, 2012.). It appears the data is presented in numerical order of districts because it includes time periods before and after the consolidation; on the months when those districts were consolidated, assuming numerical order, the rows for those districts go to zero. *See* Ex. 4.

longer in the minority district. The data proves a continued disparity in response times to 911 calls.

8. Plaintiffs have alleged that the number of violent crimes per officer and number of 911 calls per officer are both associated with long response times. Compl. ¶ 27. Both continue to be higher in minority districts as compared to white districts, further indicating a continuation of the historical delays in dispatching police to 911 calls in minority districts.

a. Nearly all of the minority districts continue to experience more violent crimes per officer than white districts. Ex. 2. This factor is related to longer response times. During September 2013, violent crimes per field (or beat) officer in minority districts were approximately 2.35 times greater than the same metric in white districts. Even when additional officers from the Violence Reduction Initiative and Area Saturation Teams (who we understand are generally not assigned to 911 calls) are included, the violent crime per officer in minority districts is approximately 2 times greater than in white districts. *Id.* The greatest disparity is a factor of 4.3 found in comparing minority district Gresham to white district Lincoln/Foster. *Id.* When the special unit officers are considered, the disparity is still 3.7 times greater in the Gresham district. *Id.*; see also Ex. 6 for raw data on number of officers per district.

b. Nearly all of the minority districts have more Priority 1 calls per officer than white districts, indicating that the disparities in response times have continued. Ex. 3. Beat officers in minority districts have approximately 1.5 times more Priority 1 calls than beat officers in white districts. When special unit officers are included, the disparity is still 1.4 times greater. For example, the minority district of Grand Crossing had 2.6 times more Priority 1 calls per beat officer in September (23.7 calls) than officers in the white district of Lincoln/Foster (9.1 calls).

Id.; see also Ex. 6 and Ex. 4 for raw data on number of officers and number of 911 calls per district.

9.   Despite these plain disparities, the City has resisted disclosure of information critical to a full understanding of its deployment of police officers. For example, the City has refused to provide to plaintiffs the formula the City uses to assign officers to each district, the average dispatch and response times associated with each district, and how often no officer is available to respond to a 911 call per district ("RAPs"). *See* Compl. ¶ 18.

10.   The City's intended motion to dismiss should not delay discovery. To the extent the motion will attack the complaint on the sufficiency of the facts, it would be unfair to permit the City to deny the release of information prior to litigation, move for dismissal because there are allegedly insufficient facts regarding the City's deployment, and then avoid discovery on the very topics it claims plaintiffs have failed to sufficiently allege. *Yuretich v. Sole*, 259 Ill. App. 3d 311, 317 (4th Dist. 1994) ("[A] trial court should not refuse a discovery request and grant a motion to dismiss where it reasonably appears discovery might assist the party resisting the motion."), *citing Senese v. Climatemp, Inc.*, 222 Ill. App. 3d 302, 320 (1st Dist. 1991) (reversing trial court where it granted motion to dismiss based on documents attached to complaint and also denied discovery on these documents); *see also Lozman v. Putnam*, 328 Ill. App. 3d 761, 769-70 (1st Dist. 2002) ("[A] plaintiff is not required to plead facts with precision when the information needed to plead those facts is within the knowledge and control of defendant rather than plaintiff."); *Bryson v. News Am. Publ'ns, Inc.*, 174 Ill. 2d 77, 111 (1996) (reversing motion to dismiss where "the information needed to support or overcome that allegation is within the defendants' control" and therefore "[t]he defendants cannot realistically claim that the lack of factual detail hinders their ability to prepare an answer or a defense for trial").

11.   Other potential bases for a motion should not delay discovery. In ruling on the first motion to dismiss, this Court rejected the City's argument that the complaint should be dismissed because the plaintiffs failed to allege facts showing standing. Order at 3-4. Further, the First District not only reversed on the political question theory, but emphasized the need for discovery before reaching the merits. *CANA*, 2013 IL App (1st) 123041, ¶ 14.

12.   Further, the City's FOIA responses show that the production of the requested documents and information relevant to showing disparate impact will not be burdensome. The data, including police deployment, numbers of 911 calls, numbers of RAPs (the code used when there is no officer available to respond to a call), and dispatch and response times, are all kept in electronic databases. *See, e.g.*, Ex. 4 (911 call data provided from an electronic database). This information is accessible and available; there is no justification, after two years of litigation, for the City to continue to refuse to provide it. To the extent that the City has previously asserted the sensitivity of, and refused to identify, the specific districts in providing some of the data, (*see* Ex. 7), plaintiffs are informed that the City has suddenly abandoned that position and produced dispatch times to local media. The City has no legitimate reason not to disclose all data relevant to disparate impact and how it deploys Chicago's police officers.
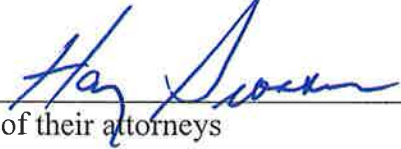
13.   Plaintiffs are seeking an injunction against the City's method of deployment, which is currently causing harm to plaintiffs' members who live in minority districts. Police responses to 911 calls in minority neighborhoods are much slower than responses in white neighborhoods, leaving residents of minority neighborhoods with more instances when no officer is available to respond, even when there is a threat to a person's life or property. Compl. ¶¶ 20-26, 31-32, 54. A further delay in discovery will only perpetuate this inequity.

For the foregoing reasons, plaintiffs request that this Court set a case management schedule that allows discovery to commence, requires written fact discovery to be complete by September 15, 2014, and requires oral fact discovery to be complete October 15, 2014.

March 26, 2014

Respectfully submitted,

THE CENTRAL AUSTIN NEIGHBORHOOD ASSOCIATION and AMERICAN CIVIL LIBERTIES UNION OF ILLINOIS

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CERTIFICATE OF SERVICE

Karen Sheley, an attorney, hereby certifies that on March 26, 2014, she caused copies of the foregoing Plaintiffs' Motion for a Discovery Schedule to be served by e-mail and first class mail from 180 N. Michigan Ave., Chicago, Illinois, upon:

Steven R. Patton
Andrew S. Mine
David Baron
City of Chicago Dept. of Law
30 N. LaSalle Street, Suite 1230
Chicago, Illinois 60602

Exhibit 1

Chart 1: June-Sep 2013 Priority 1 Average Dispatch Times

	No.	District	2010 White Percentage	June 2013 Average Dispatch Time Priority 1	July 2013 Average Dispatch Time Priority 1	Aug 2013 Average Dispatch Time Priority 1	Sep 2013 Average Dispatch Time Priority 1
Population majority white	18	Near North	75.50%	0:02:46	0:02:45	0:02:27	0:02:40
	19	Town Hall	75.00%	0:04:07	0:03:19	0:03:44	0:03:36
	16	Jefferson Park	69.20%	0:03:15	0:02:26	0:02:59	0:02:49
	20	Lincoln/Foster	54.10%	0:02:19	0:02:46	0:02:51	0:02:52
	1	Central	52.50%	0:02:24	0:02:17	0:02:31	0:02:22
Population majority nonwhite	24	Rogers Park	42.90%	0:02:38	0:02:55	0:02:47	0:02:35
	14	Shakespeare	42.30%	0:03:41	0:03:58	0:03:56	0:03:26
	12	Monroe	40.49%	0:04:14	0:03:51	0:04:14	0:04:51
	17	Albany Park	38.70%	0:02:30	0:02:27	0:02:56	0:02:36
	22	Morgan Park	34.20%	0:03:55	0:03:47	0:03:54	0:04:43
	8	Chicago Lawn	20.80%	0:04:18	0:04:37	0:04:30	0:04:24
	2	Wentworth	18.60%	0:02:59	0:03:08	0:03:11	0:03:05
	9	Deering	14.70%	0:04:05	0:04:07	0:04:37	0:04:17
	25	Grand Central	14.70%	0:04:11	0:04:29	0:04:57	0:04:23
	4	South Chicago	8.00%	0:06:08	0:08:11	0:05:43	0:05:54
	10	Ogden	3.60%	0:03:54	0:04:30	0:04:59	0:05:25
	11	Harrison	2.40%	0:02:54	0:03:38	0:03:50	0:03:44
	3	Grand Crossing	2.00%	0:08:29	0:10:41	0:11:05	0:08:48
	15	Austin	1.60%	0:04:00	0:04:20	0:04:40	0:04:29
	5	Calumet	1.10%	0:05:59	0:06:03	0:05:40	0:07:19
	7	Englewood	0.40%	0:03:00	0:03:38	0:04:19	0:03:28
	6	Gresham	0.30%	0:05:23	0:05:35	0:04:59	0:05:22

Note: Districts were not identified on responsive data showing dispatch times, but are assumed based on rows where numbers go to zero when districts were consolidated.

Exhibit 2

Chart 2: Violent Crimes and Officer Deployment on September 27, 2013

	No.	District	2010 White Population Percentage[3]	Violent Crimes Sep 2013[4]	Field Officers		VRI[1]	AST[2]	Total Officers	
					Officer Count	Violent Crimes per Field Officer	Officer Count	Officer Count	Total Officer Count	Violent Crimes per Total Officer
Population majority white	18	Near North	75.50%	43	145	0.2966	18		163	0.2638
	19	Town Hall	75.00%	68	138	0.4928			138	0.4928
	16	Jefferson Park	69.20%	31	99	0.3131			99	0.3131
	20	Lincoln/Foster	54.10%	27	96	0.2813			96	0.2813
	1	Central	52.50%	41	134	0.3060			134	0.3060
		MAJ WHITE AVGS				0.3431				0.3333
Population majority nonwhite	24	Rogers Park	42.90%	38	125	0.3040			125	0.3040
	14	Shakespeare	42.30%	59	89	0.6629		4.5[2]	93.5	0.6310
	12	Monroe	40.49%	87	205	0.4244	2		207	0.4203
	17	Albany Park	38.70%	57	97	0.5876			97	0.5876
	22	Morgan Park	34.20%	92	83	1.1084		11	94	0.9787
	8	Chicago Lawn	20.80%	129	167	0.7725	10	11	188	0.6862
	2	Wentworth	18.60%	100	189	0.5291	8		197	0.5076
	9	Deering	14.70%	102	149	0.6846	20[1]	8	177	0.5763
	25	Grand Central	14.70%	130	164	0.7927	20	11.5[2]	195.5	0.6650
	4	South Chicago	8.00%	151	148	1.0203	10	7	165	0.9152
	10	Ogden	3.60%	127	126	1.0079	4	9	139	0.9137
	11	Harrison	2.40%	171	164	1.0427	38	32[2]	234	0.7308
	3	Grand Crossing	2.00%	140	125	1.1200	20	10	155	0.9032
	15	Austin	1.60%	100	114	0.8772	6	22[2]	142	0.7042
	5	Calumet	1.10%	114	130	0.8769	16	5	151	0.7550
	7	Englewood	0.40%	182	213	0.8545	16[1]	7	236	0.7712
	6	Gresham	0.30%	194	160	1.2125	19	7	186	1.0430
		MAJ NONWHITE AVGS				0.8060				0.7092
		TOTAL or AVG ALL		2183	3060	0.7134	207	145	3412	0.6398

1. VRI = Violence Reduction Initiative. In the responsive data, a value is shown for district "007/009." Therefore the value was split in half and added to the existing values in districts 007 and 009.
2. AST = Area Saturation Team. In the responsive data, values are shown for districts "11&15," "14&25," and "15&25." Therefore the values were split in half and added to the existing values in districts 11, 14, 15 and 25.
3. 2010 census data.
4. Violent crime data is from data.cityofchicago.org with filters 1) date and time from 9/1/13 12:00:00 am through 9/30/13 11:59:59 pm; and 2) FBI codes 01A, 02, 03, 04A and 04B (violent crime).

Exhibit 3

Chart 3: Priority 1 911 Calls and Officer Deployment on September 27, 2013

	No.	District	2010 White Population Percentage[3]	Priority 1 911 Calls for Sep 2013	Field Officers		VRI[1]	AST[2]	Total Officers	
					Officer Count	Priority 1 911 Calls per Field Officer	Officer Count	Officer Count	Total Officer Count	Priority 1 911 Calls per Total Officer
Population majority white	18	Near North	75.50%	1307	145	9.0138	18		163	8.0184
	19	Town Hall	75.00%	1994	138	14.4493			138	14.4493
	16	Jefferson Park	69.20%	1463	99	14.7778			99	14.7778
	20	Lincoln/Foster	54.10%	869	96	9.0521			96	9.0521
	1	Central	52.50%	1096	134	8.1791			134	8.1791
		MAJ WHITE AVGS				10.9951				10.6810
Population majority nonwhite	24	Rogers Park	42.90%	1579	125	12.6320			125	12.6320
	14	Shakespeare	42.30%	1523	89	17.1124		4.5[2]	93.5	16.2888
	12	Monroe	40.49%	2172	205	10.5951	2		207	10.4928
	17	Albany Park	38.70%	1477	97	15.2268			97	15.2268
	22	Morgan Park	34.20%	1712	83	20.6265		11	94	18.2128
	8	Chicago Lawn	20.80%	3297	167	19.7425	10	11	188	17.5372
	2	Wentworth	18.60%	2101	189	11.1164	8		197	10.6650
	9	Deering	14.70%	2551	149	17.1208	20[1]	8	177	14.4124
	25	Grand Central	14.70%	2874	164	17.5244	20	11.5[2]	195.5	14.7008
	4	South Chicago	8.00%	3079	148	20.8041	10	7	165	18.6606
	10	Ogden	3.60%	2369	126	18.8016	4	9	139	17.0432
	11	Harrison	2.40%	3257	164	19.8598	38	32[2]	234	13.9188
	3	Grand Crossing	2.00%	2968	125	23.7440	20	10	155	19.1484
	15	Austin	1.60%	2106	114	18.4737	6	22[2]	142	14.8310
	5	Calumet	1.10%	2419	130	18.6077	16	5	151	16.0199
	7	Englewood	0.40%	3597	213	16.8873	16[1]	7	236	15.2415
	6	Gresham	0.30%	3147	160	19.6688	19	7	186	16.9194
		MAJ NONWHITE AVGS				17.2500				15.1790
		TOTAL or AVG ALL		48957	3060	15.9990	207	145	3412	14.3485

1. VRI = Violence Reduction Initiative. In the responsive data, a value is shown for district "007/009." Therefore the value was split in half and added to the existing values in districts 007 and 009.
2. AST = Area Saturation Team. In the responsive data, values are shown for districts "11&15," "14&25," and "15&25." Therefore the values were split in half and added to the existing values in districts 11, 14, 15 and 25.
3. 2010 census data.

Exhibit 4

December 6, 2013

Karen Sheley – FA 13-1361
ACLU
ksheley@aclu-il.org

Re: Chicago Police Department (CPD) Response Times

Dear Karen Sheley,

On behalf of the Office of Emergency Management and Communications (OEMC), I am responding to your Freedom of Information Act (FOIA) request our office received November 5, 2013 were you requested:

"Records sufficient to show the average response times to priority one 911 calls in each police district, by month from May 1, 2013 until date of production without identifying which districts are associated with the average response times".

Based on previous request, we believe that you are seeking dispatch times. We are attaching responsive records.

Sincerely,

Dionne Tate
Freedom of Information Officer
Office of Emergency Management and Communications
312-746-9424

Avg_Dispatch_Times_By_District_Month

OFFICE OF EMERGENCY MANAGEMENT & COMMUNICATIONS

FROM: 01-MAY-2013 00:00:00
TO: 12-NOV-2013 23:59:59

Average Dispatch Times for Priority '1%' Events ONLY

(*See Report Notes on the last page.)

District	Count/DspTime	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL
—	Event Count	0	0	0	0	1173	1273	1291	1292	1096	1111	448	0	7684
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:28	00:02:24	00:02:17	00:02:31	00:02:22	00:02:21	00:03:00	00:00:00	00:02:26
—	Event Count	0	0	0	0	2335	2294	2386	2306	2101	2063	713	0	14198
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:35	00:02:59	00:03:08	00:03:11	00:03:05	00:02:45	00:02:45	00:00:00	00:02:57
—	Event Count	0	0	0	0	3219	3326	3361	3216	2968	2815	983	0	19888
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:07:10	00:08:29	00:10:41	00:11:05	00:08:48	00:09:51	00:07:53	00:00:00	00:09:16
—	Event Count	0	0	0	0	3409	3413	3718	3555	3079	3074	1122	0	21370
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:06:26	00:06:08	00:08:11	00:05:43	00:05:54	00:05:34	00:05:01	00:00:00	00:06:18
—	Event Count	0	0	0	0	2712	2644	2644	2628	2419	2275	798	0	16120
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:05:50	00:05:59	00:06:03	00:05:40	00:07:19	00:07:24	00:05:39	00:00:00	00:06:18
—	Event Count	0	0	0	0	3477	3328	3511	3383	3147	3237	1055	0	21138
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:05:12	00:05:23	00:05:35	00:04:59	00:05:22	00:04:50	00:04:33	00:00:00	00:05:12
—	Event Count	0	0	0	0	3981	4102	4233	4159	3597	3385	1244	0	24701
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:03:03	00:03:00	00:03:38	00:04:19	00:03:28	00:03:12	00:03:24	00:00:00	00:03:27
—	Event Count	0	0	0	0	3390	3545	3690	3611	3297	3047	1115	0	21695
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:03:56	00:04:18	00:04:37	00:04:30	00:04:24	00:03:39	00:03:52	00:00:00	00:04:14
—	Event Count	0	0	0	0	2791	2826	2883	2861	2551	2265	822	0	16999
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:04:05	00:04:05	00:04:07	00:04:37	00:04:17	00:03:43	00:03:38	00:00:00	00:04:08

OFFICE OF EMERGENCY MANAGEMENT & COMMUNICATIONS

FROM: 01-MAY-2013 00:00:00
TO: 12-NOV-2013 23:59:59

Average Dispatch Times for Priority '1' Events ONLY

(*See Report Notes on the last page.)

District	Count/DspTime	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL
	Event Count	0	0	0	0	2498	2539	2639	2574	2369	2210	818	0	15647
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:04:19	00:03:54	00:04:30	00:04:59	00:04:24	00:04:17	00:04:34	00:00:00	00:04:34
	Event Count	0	0	0	0	3394	3514	3677	3643	3257	3101	1039	0	21625
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:03:05	00:02:54	00:03:38	00:03:50	00:03:44	00:03:13	00:02:45	00:00:00	00:03:22
	Event Count	0	0	0	0	2114	2361	2355	2288	2172	2002	651	0	13943
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:03:20	00:04:14	00:03:51	00:04:14	00:04:51	00:04:08	00:03:06	00:00:00	00:04:04
	Event Count	0	0	0	0	1548	1787	1809	1716	1523	1438	513	0	10334
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:54	00:03:41	00:03:58	00:03:56	00:03:26	00:02:53	00:02:35	00:00:00	00:03:27
	Event Count	0	0	0	0	2368	2348	2541	2444	2106	2012	810	0	14629
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:04:00	00:04:00	00:04:20	00:04:40	00:04:29	00:03:59	00:04:15	00:00:00	00:04:15
	Event Count	0	0	0	0	1527	1446	1631	1606	1463	1411	500	0	9584
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:28	00:03:15	00:02:26	00:02:59	00:02:49	00:02:52	00:02:36	00:00:00	00:02:47
	Event Count	0	0	0	0	1501	1529	1594	1536	1477	1301	456	0	9394
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:41	00:02:30	00:02:27	00:02:56	00:02:36	00:02:31	00:02:19	00:00:00	00:02:36
	Event Count	0	0	0	0	1399	1413	1520	1541	1307	1335	514	0	9029
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:55	00:02:46	00:02:45	00:02:27	00:02:40	00:02:18	00:02:46	00:00:00	00:02:39
	Event Count	0	0	0	0	2053	2148	2101	2205	1994	1802	715	0	13018
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:44	00:04:07	00:03:19	00:03:44	00:03:36	00:04:48	00:02:44	00:00:00	00:03:38

OFFICE OF EMERGENCY MANAGEMENT & COMMUNICATIONS

Average Dispatch Times for Priority '1%' Events ONLY

FROM: 01-MAY-2013 00:00:00

TO: 12-NOV-2013 23:59:59

(*See Report Notes on the last page.)

District	Count/DspTime	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL
	Event Count	0	0	0	0	928	922	945	1017	869	862	298	0	5841
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:49	00:02:19	00:02:46	00:02:51	00:02:52	00:02:50	00:02:25	00:00:00	00:02:44
	Event Count	0	0	0	0	1842	1913	1903	1893	1712	1696	625	0	11584
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:04:04	00:03:55	00:03:47	00:03:54	00:04:43	00:05:03	00:03:44	00:00:00	00:04:11
	Event Count	0	0	0	0	1554	1590	1717	1777	1579	1551	548	0	10316
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:02:27	00:02:38	00:02:55	00:02:47	00:02:35	00:02:30	00:02:48	00:00:00	00:02:39
	Event Count	0	0	0	0	2798	3147	2984	3114	2874	2563	902	0	18382
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:03:52	00:04:11	00:04:29	00:04:57	00:04:23	00:03:58	00:03:17	00:00:00	00:04:16
	Event Count	0	0	0	0	986	1015	1033	957	945	795	318	0	6049
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:54:46	00:54:44	00:46:07	00:44:37	02:10:49	00:48:18	00:40:35	00:00:00	01:01:58
	Event Count	0	0	0	0	52997	54423	56166	55322	49902	47351	17007	0	333168
	Avg Dsp Time	00:00:00	00:00:00	00:00:00	00:00:00	00:04:58	00:05:11	00:05:25	00:05:20	00:06:55	00:05:02	00:04:31	00:00:00	00:05:25

Exhibit 5

Top cop explains police station closings as critics question savings

BY JON SEIDEL Sun-Times Media jseidel@suntimes.com March 3, 2012 9:14PM

Updated: April 5, 2012 8:25AM

Chicago Police Superintendent Garry McCarthy said residents of low-crime areas shouldn't worry their neighborhoods will be left with less protection as his department closes and consolidates districts Sunday in its first major structural change in 31 years.

But a resident of one of the affected districts said the changes are too abrupt and the leader of the Chicago Fraternal Order of Police questioned whether the move will really produce the $10-$12 million savings projected by the city.

"Not all of the moves make sense," said Chicago FOP President Michael Shields.

Starting Sunday, the city will switch from five patrol and detective area commands to three — central (Area 1), south (Area 2) and north (Area 3). Two police districts will also be closed and absorbed by other districts. Officers from the Prairie District, 300 E. 29th, will be spread among the Wentworth District, at 5101 S. Wentworth; the Deering District, 3120 S. Halsted; and Central District at 1718 S. State.

The Belmont District at 2452 W. Belmont will move to the Town Hall District facility at 850 W. Addison. It'll keep the Town Hall name but use Belmont's old number, "19."

Before the consolidation, McCarthy said the affected districts ranked in the bottom 10 out of 25 in numbers of officers assigned, population, geographical area, calls for service and crime. After consolidation, he said, they'll rank in the top three for officers assigned, and mid-level in each of the other categories.

Each consolidation also puts as many as 20 extra officers on the street, McCarthy said. The changes are part of a search for long-term solutions, he said, flattening out bureaucracy and working toward the "most efficient crime-fighting machine" the city can have. He said the communities don't have to worry about having enough protection, because the department's not shifting resources.

"It's not the buildings that protect the public," McCarthy said. "It's the officers."

Al Livingstone, who said he lives in the Town Hall District, said the changes are coming too quickly.

"I think the community should have been involved," Livingstone said after McCarthy's press conference at the Town Hall station.

Police officials said the Prairie District's building, opened in 1952, is the only one actually closing. The Belmont building will still be used, Shields pointed out, so he said it's not "a case of the city shutting the lights out and closing up the building."

And he said he worries officers will slowly be removed from some districts, despite McCarthy's comments.

"I still am concerned that some officers will be phased out of the Addison Street station and brought elsewhere," Shields said.

The city's Wood District is also expected to close, but McCarthy said that won't happen until later this fall because of construction. Critics of that proposal have started a website to oppose it.

DNAinfo.com Chicago
neighborhood news

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Wicker Park & Bucktown

See more: Anne Shaw, Commander Melissa Staples, Kevin Anderson, Melissa Staples, Rahm Emanuel, Save the 13th, Wood Street Police Station, Little Italy police station, Near West, Near West District, Wood Street Station, 13th Distrct merging, near west, Near West Police District, new commanders CPD, new police station, UK village police station, Wood street station closing Dec 19

End of Era at Wood Street Station as Police Head South, Report to New Brass *Updated December 18, 2012 10:24am*

December 18 2012 10:24am | By Alisa Hauser, DNAinfo Reporter/Producer　　　Comments　share　print　RECOMMEND

Wicker Park & Bucktown Newsletter
SIGN UP NOW!

Email Address　　　　　　　Zip Code

EAST VILLAGE — Officers from the Wood Street Station on Wednesday will report to a new $21 million facility 3.3 miles south of their old to join the Near West District, a merger of two districts

Commander Melissa Staples, a 22-year-department veteran, will lead the Near West District at 1412 S. Blue Island Ave., on the border of Little Italy and Pilsen neighborhoods

The venture consolidates the 12th and 13th Districts and represents the city's largest police district, spanning eight communities and employing over 500 officers, Mayor Rahm Emanuel said at an unveiling of the environmentally friendly building Saturday

Melissa Staples, a 22-year veteran of the Chicago Police Department, will serve as commander of the new 'Near West' District when it opens this week at 1412 S. Blue Island Avenue.

The new $21 million facility absorbs the 12th and 13th districts.

(Geoff Ziezulewicz)

Acting Wood St District Commander Capt Kevin Anderson, 52, who replaced a retired commander in mid-October, described the new facility as "light years ahead" of the existing police station and predicted it will be "a morale booster" for officers

Built in 1960, the neighborhood police station was eliminated as part of Mayor Emanuel's 2012 budget. Currently the basement at the Wood St. station suffers from flooding and is not ADA compliant, Anderson said

Police Supt Garry McCarthy referred to residents' concerns about lessened police presence due to the closure of the station at 937 N Wood St as "unfounded."

"A building doesn't keep people safe The cops do," McCarthy said, citing "more officers on the streets and greater efficiencies"

Policing beats in the consolidated 'Near West' will be reduced from 18 to 15, as reported in a final 13th district beat meeting earlier this month

Attorney and East Village resident Anne Shaw organized a 'Save the 13th' petition that yielded over 1,800 signatures and toured the 'Near West' station.

"It's big, it's nice, it's really far away. We are most concerned about distance and rapid response times. With a larger beat area we don't know where [the officers] are coming from," Shaw said.

Looking to the future, Shaw said that Staples has "got a very impressive background, knows the 13th District very well, and she's very friendly and committed to working with the community and plans to go to all CAPS meetings."

A police spokeswoman did not return calls for comment.

A new police station at 1412 S Blue

Exhibit 6

Rahm Emanuel
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Garry F. McCarthy
Superintendent of Police

January 8, 2014

Karen Sheley
ACLU - Roger Baldwin Foundation
180 N Michigan Ave. Suite 2300
Chicago, IL 60601

Re: NOTICE OF RESPONSE
       REQUEST DATE: November 8, 2013
       FOIA FILE NO.:   13-4552

Dear Ms. Sheley :

The Chicago Police Department is in receipt of your Freedom of Information Act (FOIA) request. In it, you ask to be provided with the following records;

1)   The number of officers deployed to the Violence Reduction Initiative (per day/district) from September 22-28, 2013.

2)   The number of officers deployed in each of the three Area Saturation Teams for all 2013 police periods (to-date).

3)   The number of officers deployed in each district from the three Area Saturation Teams from September 22-28, 2013.

4)   The number of officers (per district) assigned to beat patrol, lockup, desk crew, and any other assignment from September 22-28, 2013.

Your request was reviewed by the undersigned. Upon review, it was determined that your request is granted. The attached records were provided by the Patrol Division in response to this FOIA request.

If I can be of further assistance, you may contact me at (312) 745-5308, or by mail at the below address:

Chicago Police Department
Office of Legal Affairs
Attn: Freedom of Information Officer
3510 S. Michigan Ave.
Chicago, IL 60653

Sincerely,

P.O. Jack Enter
Freedom of Information Officer
Chicago Police Department

CHICAGO POLICE DEPARTMENT
VRI DEPLOYMENT / DISTRICT
22-28 SEPTEMBER, 2013

Date: 22 September 2013

District	Officers
002	8
003	20
004	10
005	16
006	20
007	10
008	10
009	18
007/009	8
018	19
010	4
011	39
012	2
015	6
025	18
TOTAL:	208

Date: 23 September 2013

District	Officers
002	6
003	20
004	10
005	20
006	20
007	14
008	10
009	20
007/009	10
018	19
010	4
011	38
012	2
015	6
025	20
TOTAL:	219

Date: 24 September 2013

District	Officers
002	8
003	20
004	10
005	16
006	18
007	12
008	10
009	18
007/009	8
018	18
010	4
011	38
012	2
015	6
025	18
TOTAL:	206

Date: 25 September 2013

District	Officers
002	8
003	20
004	10
005	18
006	20
007	12
008	10
009	20
007/009	9
018	18
010	4
011	36
012	2
015	6
025	18
TOTAL:	211

Date: 26 September 2013

District	Officers
002	8
003	20
004	10
005	16
006	20
007	14
008	10
009	20
007/009	10
018	18
010	4
011	36
012	2
015	6
025	18
TOTAL:	212

Date: 27 September 2013

District	Officers
002	8
003	20
004	10
005	16
006	19
007	12
008	10
009	16
007/009	8
018	18
010	4
011	38
012	2
015	6
025	20
TOTAL:	207

Date: 28 September 2013

District	Officers
002	8
003	20
004	10
005	16
006	20
007	10
008	10
009	20
007/009	10
018	19
010	4
011	34
012	2
015	5
025	16
TOTAL:	204

CHICAGO POLICE DEPARTMENT
AREA SATURATION TEAM STRENGTH / PERIOD
2013 YTD

	1st Period 2013 01/06/13 - 02/02	2nd Period 2013 02/03 - 03/02	3rd Period 2013 03/03 - 03/30	4th Period 2013 03/31 - 04/27	5th Period 2013 04/28 - 05/25	6th Period 2013 05/26 - 06/22	7th Period 2013 06/23 - 07/20	8th Period 2013 07/21 - 08/17	9th Period 2013 08/18 - 09/14	10th Period 2013 09/15 - 10/12	11th Period 2013 10/13 - 11/09
Area Central (211) Police Officers	41	74	74	72	72	70	70	70	70	70	69
Area South (212) Police Officers	38	54	54	53	50	43	43	43	43	43	43
Area North (213) Police Officers	44	61	91	96	94	91	90	89	89	89	104
Total	123	189	219	221	216	204	203	202	202	202	216

Area Central (211) Sergeants	5	8	8	8	8	8	7	8	8	8	8
Area South (212) Sergeants	4	6	6	6	6	5	5	5	5	5	5
Area North (213) Sergeants	5	7	10	10	10	10	10	10	10	10	11
Total	14	21	24	24	24	23	22	23	23	23	24

CHICAGO POLICE DEPARTMENT
AREA SATURATION TEAM DEPLOYMENT
9/22/2013 - 9/28/2013

DISTRICT	22-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	28-Sep
3	27	18	19	31	21	10	24
4	7	7	7	15	14	7	5
5			4	4	5	5	6
6	7	11	12	10	4	7	3
7	7	7			6	7	
8	9	5	10	8	8	11	10
9	10				8	8	17
10	5	26	22	14	10	19	
11			9	9	9	9	9
15				8	9	11	4
22	6	4	7	8	9	9	9
25	18	18	16	7	7	7	9
11&15	35	36	37	29	19	26	35
14&25				18	9	9	
15&25							
Total	131	132	143	153	138	145	122

CHICAGO POLICE DEPARTMENT
DISTRICT PERSONNEL ASSIGNMENT (BY TYPE)
9/22/2013 - 9/28/2013

District	9/22/2013 A	D	F	L	9/23/2013 A	D	F	L	9/24/2013 A	D	F	L	9/25/2013 A	D	F	L	9/26/2013 A	D	F	L	9/27/2013 A	D	F	L	9/28/2013 A	D	F	L
1	0	11	116	0	1	13	140	0	2	12	142	0	2	11	139	0	2	11	148	0	1	11	134	0	1	10	107	0
2	3	9	152	3	3	11	178	3	3	8	198	3	4	10	192	3	3	10	190	5	3	10	189	7	1	12	138	4
3	1	10	123	1	2	12	139	2	4	11	165	2	3	10	167	2	3	12	156	2	3	13	125	2	1	12	117	2
4	1	10	125	3	3	10	147	2	5	10	166	1	6	11	169	1	4	10	169	3	4	12	148	2	2	11	122	2
5	1	11	97	2	5	12	108	4	5	11	149	4	6	11	151	2	3	11	137	3	3	13	130	3	2	13	90	1
6	1	7	135	2	3	8	153	5	3	7	179	2	3	7	183	2	2	8	169	2	2	6	160	2	1	6	140	3
7	0	7	140	4	3	11	168	2	5	10	216	5	2	12	226	5	2	11	233	3	2	11	213	6	1	7	136	5
8	1	10	153	0	3	11	166	5	2	12	169	0	3	12	168	0	3	11	171	0	3	11	167	1	2	11	136	1
9	0	5	116	4	1	7	159	4	3	9	168	3	2	7	167	3	1	9	153	4	3	11	149	3	2	7	126	4
10	3	11	107	2	4	11	130	3	5	11	143	4	5	11	154	3	3	10	134	4	1	10	126	1	4	10	109	2
11	1	13	134	9	3	14	167	8	2	12	184	10	6	11	176	6	7	11	158	7	2	13	164	7	0	15	129	9
12	2	6	159	0	2	10	196	0	4	9	211	0	2	10	210	0	2	9	195	0	3	5	205	0	3	9	152	0
14	1	8	96	0	2	8	99	0	3	10	112	0	3	9	110	0	3	10	100	0	3	10	89	0	1	9	78	0
15	1	10	104	3	3	10	122	3	3	10	128	3	3	11	124	3	2	11	122	3	2	12	114	3	3	11	99	3
16	1	6	92	1	3	6	106	1	4	8	98	2	4	6	101	2	3	7	96	1	2	7	99	1	1	6	92	1
17	2	7	81	0	4	6	103	0	3	6	103	0	3	6	104	0	3	6	106	0	3	6	97	0	0	7	73	0
18	0	12	137	3	2	12	147	2	2	14	159	4	2	14	169	3	3	13	153	1	3	13	145	3	0	13	136	3
19	0	13	116	5	3	13	145	2	1	11	174	1	3	13	166	1	2	13	147	2	3	15	138	2	0	13	116	2
20	2	6	75	0	2	6	89	0	0	6	100	0	3	6	101	1	0	6	101	0	1	6	96	1	1	6	77	1
22	3	9	77	2	4	9	98	2	3	10	104	3	4	10	104	2	3	11	94	2	3	11	83	2	2	8	75	1
24	1	9	103	0	3	9	133	0	3	9	139	0	3	9	136	0	3	9	127	0	0	12	125	0	1	9	107	0
25	2	14	117	3	5	13	155	4	4	13	159	2	4	14	159	5	5	14	162	4	4	13	164	2	2	14	121	2

A = ADMINISTRATIVE
D = DESK
F = FIELD UNIT
L = LOCKUP

Exhibit 7

OFFICE OF EMERGENCY MANAGEMENT AND COMMUNICATIONS
CITY OF CHICAGO

June 18, 2013

Karen Sheley – FA 13-0635
ACLU
ksheley@aclu-il.org

Re: Chicago Police Department (CPD) Response Times

Dear Karen Sheley,

On behalf of the Office of Emergency Management and Communications (OEMC), I am responding to your Freedom of Information Act (FOIA) request our office received May 23, 2013 were you requested:

"Records sufficient to show the average response times to priority one 911 calls in each police district, by month from January 1, 2011 until May 23, 2013".

Please be advised that your request for CPD response times has been denied. Response times provide details about the mobilization and deployment of personnel, which is specifically exempt under the following:
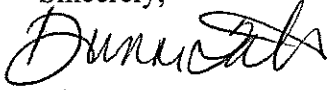
5ILCS 140/7(1)(v): Vulnerability assessments, security measures and response policies or plans that are designed to identify, prevent, or respond to potential attacks upon a community's population or systems, facilities, or installations, the destruction or contamination of which would constitute a clear and present danger to the health or safety of the community, but only to the extent that disclosure could reasonably be expected to jeopardize the effectiveness of the measures or the safety of the personnel who implement them or the public. Information exempt under this item may include such things as details pertaining to the mobilization or deployment of personnel or equipment, to the operation of communication systems or protocols, or to tactical operations.

5ILCS 140/7(1)(vi) Endanger the life or physical safety of law enforcement or any other person.

Response times will show how long it takes an officer to notify OEMC that it is responding to a call. Providing those response times will allow those wishing to harm others to know a minimum average time before a call is responded to. With that information, criminal will know how long it has before there is a police response.

To the extent that you consider this is a denial of your FOIA request, you have a right of review by the Illinois Attorney General's Public Access Counselor, who can be reached at 500 S. Second Street, Springfield, Illinois 62706 or by telephone at 217-558-0486. You may also seek judicial review of a denial under 5 ILCS 40/11 of FOIA.

Sincerely,

Dionne Tate
Freedom of Information Officer
Office of Emergency Management and Communications
312-746-9424