

Exhibit I

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

ERIC WILKINS, MAHARI BELL,	)	
ESSENCE JEFFERSON, JOSE	)	
MANUEL ALMANZA, JR., AND	)	
JACQUEZ BEASLEY,	)	
	)	
	)	
Plaintiffs,	)	Case No. 23-cv-4072
	)	
v.	)	
	)	
CITY OF CHICAGO,	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF ALEXANDRA K. BLOCK
IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Alexandra K. Block, state as follows:

1. I am over the age of 18. I make this declaration based on my own personal knowledge, and, if called to testify, could and would testify as stated herein.

2. I submit this declaration in support of Plaintiffs' Motion for Class Certification in the above-captioned matter to establish that Plaintiffs' counsel at the Roger Baldwin Foundation of ACLU, Inc. ("RBF") possess the knowledge, experience, and resources to adequately represent the proposed Plaintiff class.

3. I am the director of RBF's Criminal Legal System and Policing Project. RBF is the legal arm of the ACLU of Illinois, Inc., a statewide membership organization dedicated to protecting and promoting civil rights and civil liberties throughout Illinois.

4. I am a member in good standing of the Bars of Illinois, New York, Connecticut, and Massachusetts (inactive). I am a member in good standing of the Northern District of Illinois Trial Bar, as well as a member of the bar of several other federal courts.

5. I graduated from Yale Law School in 2004. I completed a clerkship with The Hon. Janet Bond Arterton in the District of Connecticut. In 2006, I joined the Connecticut law firm Garrison, Levin-Epstein, Chimes & Richardson, where I litigated employment discrimination, whistleblower, and non-compete cases on behalf of plaintiffs. In 2008 I joined the Chicago litigation firm now known as Miller Shakman Levine & Feldman, and I was elevated to Partner in 2015. While at Miller Shakman I litigated a variety of complex matters in the areas of commercial litigation, attorney malpractice, employment/non-competition, and government transparency, while also representing individuals and organizations *pro bono* through RBF, Legal Aid Chicago, and the Northern District of Illinois' Settlement Assistance Program.

6. I joined RBF full time in 2022, and since then have I served as lead or co-lead counsel in civil rights and government transparency matters related to policing, including: enforcement of the police reform consent decree in *Illinois v. Chicago*, No. 17-cv-06260 (N.D. Ill) on behalf of ACLU of Illinois and a coalition of other community and civil rights organizations; *Campos v. Chicago et al.*, 22-cv-02777 (N.D. Ill.) (civil rights case alleging Fourth Amendment false arrest and First Amendment retaliation claims against City of Chicago and individual police officers); *Central Austin Neighborhood Association et al. v. Chicago*, 11CH37299 (Cook County Cir. Ct.) (lawsuit alleging the Chicago Police Department's pattern of slower response times to 911 emergency calls in neighborhoods where a majority of residents are Black and Latino violates the Illinois Civil Rights Act); and *ACLU of Illinois v. Chicago Police Department*, 21CH03442

(Cook County Cir. Ct.) (FOIA lawsuit against CPD for failure to release public records related to social media surveillance).

7. Additionally, I have authored or co-authored *amicus* briefs in the following civil rights matters related to policing and the criminal legal system: *People v. Clark*, No. 127838 (Ill. S. Ct. 2024) (criminal appeal challenging CPD’s practice of issuing warrantless investigative alerts seeking arrests); *Chicago John Dineen Lodge #7 v. City of Chicago*, No. 1-24-0875 (Ill. App. Ct., 1st Dist. 2024) (urging that serious disciplinary cases against CPD officers should be heard publicly and not in closed-door arbitrations); *People v. Molina and Redmond*, Nos. 129201, 129327 (Ill. S. Ct. 2023) (addressing whether the odor of cannabis alone provides probable cause to search vehicles after legalization of cannabis in Illinois); *Rowe v. Raoul*, No. 129248 (Ill. S. Ct. 2023) (supporting Illinois’ Pretrial Fairness Act abolishing money bond); and *People v. Sneed*, No. 127968 (Ill. S. Ct. 2022) (arguing that compelling a criminal suspect to enter a passcode to open his phone is testimony privileged by the Fifth Amendment).

8. RBF staff attorney Joseph P. DiCola also serves as counsel to the proposed class in this matter. Mr. DiCola is a 2018 graduate of the University of Illinois-Chicago School of Law. He previously served as a staff attorney for the Westside Justice Center and First Defense Legal Aid, where he represented plaintiffs in a variety of civil litigation matters, including numerous civil rights and policing cases. Additionally, while at First Defense Legal Aid, Mr. DiCola was a member of the counsel team to the Plaintiffs and proposed class in *Williams, et al v. City of Chicago, et al*, 22-cv-03773. Mr. DiCola joined RBF in Fall 2024. In addition to the above-captioned matter, Mr. DiCola also serves as co-counsel to the Community Coalition in *Illinois v. Chicago*, No. 17-cv-06260 (N.D. Ill).

9. RBF has the knowledge, expertise and resources to prosecute this action, in conjunction with our co-counsel at the law firm Arnold & Porter Kaye Scholer, LLP (“A&P”).

10. RBF is providing its services *pro bono* to the named Plaintiffs and proposed Class, reserving its right to seek its attorneys’ fees and costs from the Defendant under 28 U.S.C. § 1988 and other applicable fee-shifting provisions.

11. I do not anticipate any reason that class members would dispute the adequacy of RBF’s representation.

12. I know of no conflicts among members of the proposed Class or between the attorneys and members of the proposed Class.

13. The Declaration of Chris Burbank in Support of Plaintiffs’ Motion for Class Certification is supported by 116 exhibits. Those exhibits with WILKINS Bates numbers are true and correct copies of documents produced by Plaintiffs in discovery in this matter, some of which have been excerpted as noted in the table of exhibits. Those exhibits with CITY Bates numbers are true and correct copies of documents produced by Defendant City of Chicago in this matter, some of which have been excerpted as noted in the table of exhibits and in Plaintiffs’ motion to seal. Those exhibits without Bates numbers are documents from the files of Plaintiffs’ counsel in this matter and will be produced with WILKINS Bates numbers. Chief Burbank received each of these documents from Plaintiffs’ counsel in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 8, 2025

/s/ Alexandra K. Block
Alexandra K. Block