

**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,	)	
	)	Case No. 23-cv-04072
Plaintiffs,	)	
	)	Hon. Mary M. Rowland
v.	)	
	)	
CITY OF CHICAGO,	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF CHRIS BURBANK IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Professional Background

1. I have 34 years of experience as a law enforcement officer and policing practices expert. My curriculum vitae is attached to this declaration as Exhibit 1.

2. Briefly summarized, I was the Chief of Police for the Salt Lake City Police Department from 2006 to 2015. In that position, I led a department of approximately 600 employees in a large and growing metropolitan area. I was responsible for evaluating and establishing the Salt Lake City Police Department's public safety priorities and strategies, engaging with municipal stakeholders and community partners, and protecting life, safety and property within our jurisdiction.

3. I began my law enforcement career as a police officer in the Salt Lake City Police Department in 1991. I was promoted multiple times to positions of increasing responsibility

between 1991 and 2006. Among other positions, I oversaw training, internal affairs, and accountability within the department at various times.

4. For the past ten years, I have served as Vice President of Strategic Partnerships with the Center for Policing Equity (CPE), a not-for-profit organization dedicated to evidence-based research on racial bias and use of force by police. In this role, I undertake research and advise public safety agencies on policing best practices.

5. I have not authored any publications within the past ten years. I have provided expert testimony in one matter within the past four years: *City of Hurricane, UT v. Danyale Blackmore*, Docket No. 201300009.

6. I am being compensated for my expert witness services in this matter at the rate of \$150 per hour for research/writing and \$350 per hour for testimony. My compensation is not contingent on the results of this analysis or on the outcome of this litigation.

Assignment

7. I have been retained as an expert witness by Plaintiffs' counsel in this matter. I submit this declaration in support of Plaintiffs' motion for class certification.

8. Plaintiffs' counsel asked me to answer the following questions:

- a. Whether there is evidence that the City of Chicago has utilized a program of mass pretextual traffic stops, frisks, and searches ("the mass traffic stop program") throughout the period 2016-present.
- b. Whether there is evidence that the traffic stops experienced by the named Plaintiffs are consistent with and resulted from CPD's mass traffic stop program.

9. To complete this assignment, I have reviewed and considered the Plaintiffs' Amended Complaint [Dkt. 87] and the documents that are attached hereto as Exhibits 2-77 and cited in the text and footnotes herein. A table of exhibits is attached to this declaration.

10. I understand that the Defendant's production of documents in this matter is not yet complete. I reserve the right to supplement or revise my conclusions, and my explanations therefor, based on additional documents to be produced in discovery and subsequent deposition testimony to be adduced in this matter.

Summary of Conclusions

11. As further explained in this declaration, I conclude, based on the documents I have reviewed to date and my 34 years of experience as a law enforcement professional and criminal justice consultant, that the City of Chicago has maintained a mass traffic stop program throughout the period 2015-present that involves the following hallmarks:

- a. Conducting extremely high volumes of traffic stops, frisks, and searches concentrated in Chicago neighborhoods where predominantly Black or Latino residents live; and
- b. Implementing "activity" targets and quotas for traffic stops that result in a disproportionate number of stops, frisks, and/or searches of Black and Latino individuals in the City of Chicago.

12. I further conclude that the traffic stops, frisks and searches alleged by the named Plaintiffs and the proposed class of Black and Latino drivers likely resulted from the City's discriminatory mass traffic stop program.

Chicago's Development of the Mass Traffic Stop Program

13. This section of my report explains the development of the Chicago Police Department's ("CPD") mass traffic stop program in Fall 2015 through 2016 and how it targeted predominantly Black and Latino neighborhoods/police districts for pretextual traffic stops.

14. In March 2015, the ACLU of Illinois published a report, "Stop and Frisk in Chicago," which found that the Chicago Police Department disproportionately targeted people of

color for investigatory stops, and that approximately half of those stops were not legally justified.¹ Shortly thereafter, certain plaintiffs filed a proposed class action lawsuit, *Smith v. City of Chicago*, 1:15-cv-03467 (N.D. Ill.),² also challenging CPD's stop-and-frisk practices as unlawfully discriminatory and without legal justification in violation of the Fourth and Fourteenth Amendments.

15. Following these developments, the City of Chicago and Chicago Police Department entered into a settlement with the ACLU of Illinois (the "stop and frisk agreement") that required steps to ensure that CPD's investigatory stops and frisks complied with the Fourth Amendment and the Illinois Civil Rights Act. To monitor CPD's compliance, the stop and frisk agreement further required CPD to record detailed information about the reasons for all investigatory stops and frisks, as well as demographic data concerning the people stopped.³

16. Due to the increased scrutiny of its investigatory stop practices, CPD shifted its predominant proactive policing strategy to pretextual traffic stops in late 2015 and early 2016, as further explained below.

17. A pretextual traffic stop is a stop based on an observed violation of the applicable vehicle laws—usually a minor infraction such as a burned-out headlight or an expired vehicle registration sticker—for the purpose of investigating unrelated alleged criminal activity. The purpose of pretextual traffic stops generally is not to enforce traffic laws or to write citation tickets. Rather, the purpose is to attempt to question drivers, pat them down, and search their cars and/or belongings for contraband such as weapons or drugs. These stops are called pretextual stops

¹ Ex. 2 (WILKINS0023522-44), ACLU of Illinois, "Stop and Frisk in Chicago" report (March 2015).

² *Smith v. City of Chicago*, 1:15-cv-03467 – CourtListener.com.

³ Ex. 3 WILKINS0034042-WILKINS0034050, Investigatory Stop and Protective Pat Down Settlement Agreement (August 2015).

because their real purpose is investigatory—to find contraband—even though they are initiated based on alleged driving behavior or other vehicle-related issues.

18. CPD gradually expanded its use of pretextual traffic stops as a tactic commencing in late 2015. In the second half of 2015, based on CPD documents I have reviewed, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] including

District 5 (the Calumet District on the South Side, where 94% of the population is Black according to CPD's documents⁴), District 6 (the Gresham District on the South Side, where 97% of the population is Black according to CPD's documents⁵), and District 8 (the Chicago Lawn district on the Southwest Side, where 20% of the population is Black and 59% is Latino, according to CPD's documents⁶).⁷

19. The “activity generated” by the CPD tactical teams and special units in these missions was reported up in the chain of command in email summaries and attached reports.⁸ In these reports and generally between 2015 and the present, CPD has used the term “activity” to mean quantifiable instances of particular law enforcement actions and types of interactions with the public, including traffic stops, citations, arrests, and contraband recovered. As discussed in more detail below, CPD's practice of using quotas for traffic stops is regularly framed in terms of rewarding and encouraging

⁴ See Ex. 4 (CITY00112541-637 at 002558), District 5 Unit Profile Report (July 2017).

⁵ See *id.* at CITY00112562, District 6 Unit Profile Report (July 2017).

⁶ See *id.* at CITY00145536, District 8 Unit Profile Report (July 2017).

⁷ See Ex. 5 (CITY00415721-23), Enforcement plan for District 6 [REDACTED]

[REDACTED] (October 19, 2015); see also Ex. 6 (CITY00174428), Email from District 8 Commander James C. O'Donnell to several fellow commanders, stating, “I am forwarding a request for the Traffic Unit to conduct a mission on 63rd Street from Western to California. This is in the heart of our Top 12 Gang Conflict area where we have experienced incidents of Public Violence.” (January 14, 2016).

⁸ See Ex. 7 (CITY00353350-51), District 5 tactical team Daily Activity Report (January 8, 2016).

more “activity” (i.e., more traffic stops) or requiring specific numbers of certain types of activity, and admonishing or disciplining low “activity.”

20. CPD formalized its shift to pretextual traffic stops as its predominant proactive policing strategy, i.e., its predominant “activity,” in majority-Black and Latino neighborhoods in several memos, emails, and orders throughout 2016. CPD has framed its program of mass pretextual traffic stops as part of a strategy to combat violence generally and gang violence, specifically, as well as reduce robberies and motor vehicle thefts, among other objectives. Regardless of the various articulated purposes, CPD’s overall consistent strategy in and around 2016 (and through the present date, as explained in the next section) was to flood predominantly Black and Latino neighborhoods with pretextual traffic stops.

21. In its policy entitled Gang Violence Reduction Strategy (General Order G10-01),⁹ effective January 1, 2016, CPD expressly instructs officers to conduct pretextual traffic stop “missions” as an alleged method of reducing gang violence:

District commanders will...

C. ensure targeted vehicle enforcement missions are conducted.

1. A goal of targeted vehicle enforcement missions is to reduce gang violence, shootings, and drive-by shootings by enforcing the appropriate statutes and ordinances.

2. Members assigned to a targeted vehicle enforcement mission will focus their efforts on impounding vehicles for the following offenses: an assault weapon or narcotics in the vehicle, a revoked or suspended driver's license, playing music too loud, possession of spray paint by a minor in the vehicle, possession of an altered handicap permit, displaying a false temporary registration permit, soliciting a prostitute, fireworks in the vehicle, fleeing a police vehicle, and other appropriate ordinances that allows impounding a vehicle.

⁹ Ex. 8 (CITY00010171-82), Gang Violence Reduction Strategy General Order G10-01 (January 1, 2016); Ex. 9 (CITY00043142-53), Gang Violence Reduction Strategy General Order G10-01 (February 8, 2019).

NOTE: Members will impound vehicles consistent with the Department directive titled “Impoundment of Vehicles for Municipal Code Violations.”

3. Additional targeted vehicle enforcement will include conducting seat belt missions, red light missions, school safety zone missions, license plate reader enforcement, moving violation enforcement, and the issuance of parking citations.¹⁰

22. CPD’s written Gang Violence Reduction Strategy Policy (General Order G10-01), with its explicit instruction to officers to make pretextual traffic stops for the purpose of allegedly reducing “gang violence, shootings, and drive-by shootings,” remains in effect today.¹¹

23. The Gang Violence Reduction Strategy Policy references various types of “missions,” such as “targeted vehicle enforcement missions,” “seat belt missions, red light missions, school safety zone missions,” etc. Based on my training and experience, it is my conclusion that all of these types of “missions” involve pretextual traffic stops because their true purpose is not to enforce the vehicle laws but to attempt to find contraband such as weapons and narcotics and to seize the vehicles of drivers who are suspected of being gang members.

24. CPD’s mass traffic stop program was further refined and expanded commencing in approximately April 2016, when leaders of CPD, including Deputy Chief of Crime Control Strategies David McNaughton, researched and planned to emulate a pretextual traffic stop strategy that had been adopted by the Milwaukee Police Department.¹² Deputy Chief McNaughton expressly acknowledged the goal of these stops was not to promote traffic safety, writing that the plan was to seek an “increase in the number of traffic stops, not necessarily an increase in traffic

¹⁰ *Id.*, at VIII.C. This subsection of the General Order was unchanged in the February 2019 revision.

¹¹ See CPD Directive G10-01 available at <https://directives.chicagopolice.org/#directive/public/6430>.

¹² Ex. 10 (CITY00168918-20), Email from Deputy Chief David McNaughton to First Deputy Superintendent John Escalante, Chief of Patrol Fred Waller, and CPD Chief of Staff James Roussell regarding CompStat meeting on Milwaukee Police Department traffic stop strategy (April 20, 2016).

enforcement [tickets],” and to mandate daily reporting of traffic stop numbers to be distributed throughout the CPD.¹³

25. Based on Deputy Chief McNaughton’s recommendation, First Deputy Superintendent John J. Escalante piloted a version of the mass traffic stop program in seven “tier 2” police districts in April 2016.¹⁴ Three of these districts (3, 5, 22) have a significant majority of Black residents, one district (8) has a significant majority of Latino residents, and two (17, 24) are more racially diverse with a majority of non-white residents.^{15,16} First Deputy Superintendent Escalante instructed these districts to engage in “Traffic Enforcement Missions.” He stated, “This tactic went into effect this past weekend (1-3 April). The intent is quality stops will lead to contraband, firearms, serious traffic violations and vehicle impounds. Vehicle use in shootings is a city-wide problem.” I conclude that this email indicates CPD was testing the tactic of engaging in pretextual traffic stops, mostly in districts where the majority of the population is Black and Latino.

26. CPD rolled out the mass traffic stop program more broadly in the following weeks, keeping its hallmark elements: high volumes of pretextual traffic stops in areas where the residential population is mostly Black and Latino. On June 24, 2016, every CPD commander received a PowerPoint authored by the Milwaukee Police Department recommending the mass pretextual traffic stop strategy.¹⁷ In disseminating the PowerPoint, Deputy Chief McNaughton

¹³ *Id.*

¹⁴ See Ex. 11 (CITY00275474-76), Email from First Deputy Superintendent John Escalante to Superintendent Eddie Johnson and attached Tier 2 District Strategies (April 3, 2016).

¹⁵ District 23 no longer exists and to date CPD has not produced documents indicating the residential population profile of that former district.

¹⁶ Ex. 4 (CITY00112541-637), Email from Lieutenant John Deane in the Office of Crime Control Strategies to Chief of Patrol Fred Waller and Deputy Chief of Patrol George Devereux with the subject “Unit Profiles for Week 29 – Citywide, Areas, and Districts,” and all attached reports compiled (July 26, 2017).

¹⁷ See Ex. 12 (CITY00165372-386), Email from Deputy Chief McNaughton to commanders across the department and attaching update to GVRs and Milwaukee PD PowerPoint (June 24, 2016).

expressly noted that the purpose was to exponentially increase stops but not to increase traffic citations; he summarized CPD's strategy in a broadly-distributed email as follows:

We are trying a tactic in which we utilize traffic enforcement to reduce the number of shootings, motor vehicle thefts and street robberies. We know from experience and documented studies that more police and citizen interaction that is **active and visible** will deter criminals from engaging in the above mentioned Part I crimes. By simply increasing the number of traffic stops in the areas in which you have violence and traffic crashes it will assist in reducing crime and making your district safer.

Each beat, rapid [response unit], traffic [unit], tactical [team], saturation [team] and gang unit assigned to the field should be encouraged, coached and mentored on the importance of utilizing the traffic code to improve the safety of the citizens that we are charged to serve. Sergeants should daily monitor the activity of their officers and make inquiries and document as necessary when officers are not engaging in this proactive police tactic. Field Lieutenants should create and staff specific traffic missions, and Watch Operations Lieutenants should ensure that members under their command [are] active in traffic enforcement.

Each traffic stop an[d] event number should be obtained and then properly documented with a TSSS Card, a Driver Information Card, and ISR and/or arrest report.

It is important to note that we are not seeking an increase in traffic citations. ...

We will continue to monitor the progress of each district and watch and **expect to see the number of stops to increase exponentially**¹⁸

27. [REDACTED]

[REDACTED]

[REDACTED]¹⁹ "CompStat" is a data-driven approach to policing, pioneered in New York City in the 1990s, that utilizes crime statistics and geographic data to track crimes and crime trends. [REDACTED]

¹⁸ *Id.* at CITY00165372 (emphasis added).

¹⁹ See Ex.13 Transcript of Dep. of Deputy Chief Steven Caluris at 16:16 – 17:8, *CANA v. City of Chicago*, (2019) (No. 11 CH 37299) February 26, 2016 (Deputy Chief Steven Caluris, the Executive Officer of the Office of Crime Control Strategies, testifying that in 2016 both he and Deputy Chief McNaughton reported to CPD Chief of Staff James Roussell); see also Ex. 14 (CITY00441908-09), Email from Chief of Staff James Roussell to Superintendent Eddie Johnson, First Deputy Superintendent John Escalante, Chief of Patrol Fred Waller, and Deputy Chief McNaughton [REDACTED] (June 25, 2016).

[REDACTED]

[REDACTED]

[REDACTED]²⁰

28. On July 1, 2016, Deputy Chief McNaughton decided to test his theory “to see if the pure volume of traffic stops can make a difference” in District 11, ostensibly because that district had an “overwhelming number of shootings...involving vehicles.”²¹ The residential population of District 11 (Harrison) on the West Side of Chicago was 83% Black and 13% Latino at the time, according to CPD’s documents.²²

29. CPD continued to refine its mass traffic stop strategy through the summer of 2016. On August 10, 2016, [REDACTED] for District 2 (residential population 70% Black), District 3 (residential population 91% Black), District 5 (residential population 94% Black), District 8 (residential population 20% Black and 59% Latino) and District 22 (residential population 60% Black), [REDACTED]

[REDACTED]²³ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.*

[REDACTED]

²⁰ *Id.*

²¹ Ex. 15 (CITY00174599-602), Email from Deputy Chief David McNaughton to First Deputy Superintendent John Escalante regarding citywide traffic stop numbers and use of traffic stop tactic District 11 (Harrison) (July 1, 2016).

²² Ex. 4 (CITY00112541-637 at 112582), District 11 Unit Profile Report (July 2017).

²³ Ex. 16 (CITY00335816-29 at 335821), Email from District 5 Commander Kevin Johnson to District 5 Lieutenants [REDACTED] (August 10, 2016).

24

Id. Based on CPD's document described in this paragraph and my training and experience, I conclude that [REDACTED]

_____ is a strategy of conducting mass pretextual traffic stops in districts where the majority of the residents are Black and Latino.

30.

(Ex. 16)

25

²⁴ *Id.* at CITY00335822.

²⁵ *Id.* at CITY00335816.

31. The Area Deputy Chiefs disseminated this email to the commanders under their supervision. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* [REDACTED]

[REDACTED]²⁶

32. In sum, I conclude that, [REDACTED]

[REDACTED]

[REDACTED]. Notably, Districts 17 and 24, which were on the list of Districts in which CPD initially tested its mass traffic stop strategy in April 2016 – and which have more racially diverse populations than Districts 2, 3, 5, 8, 11 and 22 – [REDACTED]

[REDACTED] *Compare* Ex. 11 with Ex. 16.

33. The mass traffic stop program continued after Labor Day 2016, when CPD rolled up its Violence Reduction Initiative²⁷ into its mass traffic stop program.

²⁶ *Id.*

²⁷ The Violence Reduction Initiative had commenced in 2012, under then-superintendent Garry McCarthy and, in summary, involved flooding approximately twenty “impact zones” with probationary police officers and other officers working overtime. Ex. 17, Transcript of Dep. of Gary McCarthy at 22:3-22:22, *CANA v. City of Chicago*, (2019) (No. 11 CH 37299) (May 31, 2016). These “impact zones” were and are, today, primarily in neighborhoods where the majority of the residential population is Black and/or Latino. The Violence Reduction Initiative had an express quota system to reward officers for activity. For instance, a broadcast message to officers in 2013 introduced Administrative Notices of Violation (“ANOVs”), or City ordinance violations, as a category of activity that was rewarded with VRI overtime. *See* Ex. 18 (CITY00042864-65), General Message to “All Units” regarding “Violence Reduction Initiative – A.N.O.V. Pilot Program” (December 4, 2013); *see also* Officers Daily Activity Log Violence Reduction Initiative/Chicago Police Department (revised April 2015), available at <https://directives.chicagopolice.org/forms/CPD-21.318.pdf>, (form tracking TSS Cards [traffic stops], ANOVs [ordinance violations], “Parkers” [parking tickets], “Movers” [moving violation citations], “Recovered Firearms,” “Impounded Vehicles” and “Contact Cards,” among other “activity,” and noting at

34. Commencing in September 2016 and forward, essentially all of the resources that CPD had been devoting to its Violence Reduction Initiative, including officer overtime pay, was devoted to making pretextual traffic stops. On September 30, 2016, Chief of Patrol Fred Waller issued a memo to all Deputy Chiefs, District Commanders, and Commanding Officers, with the subject “Traffic Enforcement Missions for Violence Reduction Initiatives.”²⁸

As part of the strategies to combat shootings involving vehicles, personnel assigned to the Violence Reduction Initiatives will conduct traffic enforcement missions within all Priority Enforcement Zones (PEZ). These missions will be done during the entire tour of duty. District Commanders may also determine the location where traffic enforcement missions will take place within the PEZ's.

35. Based on documents I have reviewed, [REDACTED] CPD's Priority Enforcement Zones (PEZ) [REDACTED]

[REDACTED]²⁹

the top right “For Accurate Activity Credit.”) The quota system created in CPD's 2013 Violence Reduction Initiative carried through from 2013 to the present, and became a hallmark of CPD's mass traffic stop program. Additionally, because of its widespread use of officer overtime pay, the Violence Reduction Initiative provided a revenue stream for CPD to accomplish its mass traffic stop program.

²⁸ Ex. 19 (CITY00169662), Memo from Chief of Patrol Fred Waller Memo to All Deputy Chiefs, District Commanders, and Commanding Officers regarding “Traffic Enforcement Missions for Violence Reduction Initiatives” (September 30, 2016).

²⁹ Since 2016, CPD has used various terminology (other than the District number) to define geographic areas targeted for saturation policing, including “Impact Zones” and “Priority Enforcement Zones.” As of 2016, through its Operation Impact “saturation strategy,” CPD had divided the City into 20 “Impact Zones.” Ex. 17 at 22:3-22 (May 31, 2016). (The 20 Impact Zones were, at some point, reduced to 19 according to then-Superintendent Eddie Johnson. Ex. 20 Transcript of Dep. Eddie Johnson at 61:1 – 5, *CANA v. City of Chicago*, (2019) (No. 11 CH 37299) (January 26, 2016). The Impact Zones were [REDACTED] located in Districts where the majority of the population is Black or Latino: Districts 2, [REDACTED] 7, 8, 9, 10, 11, 15, and 25. *Id.* at 22:14-19; see also Ex. 21 (CITY00446578-80), [REDACTED]

[REDACTED] (June 1, 2016); Ex. 22 (CITY00414222-29), CompStat slides concerning District 8 and 10 Impact Zones (May 5, 2016); Ex. 23 (CITY00349545-46), Memo from Violence Reduction Initiative North Lieutenant to Chief of Patrol Fred Waller [REDACTED] (May 12, 2016); Ex. 24 (CITY00392196-97), Email from Crime Prevention Information Center (CPIC) administrative account to CPD Superintendent and other leadership [REDACTED]

[REDACTED] (April 17, 2016); Ex. 25 (CITY00042655) CompStat Slide Map [REDACTED] (February 18, 2016); Ex. 5 (CITY00415721-23 at 5722), [REDACTED] (October 19, 2015); Ex. 26 (CITY00041680), CompStat slide with map of District 12 including Impact Zone 12 (January 1, 2016); Ex. 27

36. Accordingly, Chief Waller's command on September 30, 2016, *supra*, that "Violence Reduction Initiatives will conduct traffic enforcement missions within all Priority Enforcement Zones" was an order to saturate areas where the significant majority of residents were Black or Latino with pretextual traffic stops, and to utilize those stops as a basis to frisk and search the occupants of vehicles for guns, drugs or other contraband.

37. I therefore conclude based on CPD's documents and my law enforcement training and experience that throughout late 2015 and 2016, CPD's mass traffic stop program developed one of the key features that it continued to display throughout the following years and to the present date, as further described below: saturating areas where the majority population is Black or Latino with high volumes of pretextual traffic stops as an excuse to conduct frisks and searches for evidence of unrelated crimes.

The Mass Traffic Stop Program Involves High Volumes of Traffic Stops Concentrated in Neighborhoods Where Most Residents are Black or Brown

38. CPD's data and other evidence confirms that CPD continued to target Black and Latino neighborhoods and individuals for mass pretextual traffic stops and searches from 2017

(CITY00205918-19), CompStat slide [REDACTED] (July 14, 2016); Ex. 28 (CITY00392275-79) Email from Deputy Chief of Bureau of Organized Crime Dana Alexander to First Deputy Superintendent John Escalante [REDACTED] (July 25, 2016); and Ex. 29 (CITY00042437) CompStat slide with map of Districts 7 and 9 with Impact Zones 2, 6, 13, 14, and 18 (March 30, 2016).

[REDACTED] Ex. 30 (CITY00441236-39), Memo from Deputy Chief of Patrol George Devereux to Chief of Patrol Fred Waller [REDACTED] (December 6, 2016).

[REDACTED] District 22 was 60% Black in 2017. *Id.*, see also Ex. 4 at CITY00112618. The PEZ framework may have been in use as recently as March 26, 2024, based on a daily activity report distributed to the Superintendent and other CPD leadership, which notes eight traffic stops made by "Priority Enforcement Zone patrol" in District 10. See Ex. 31 (CITY00104189-98 at 4193), Daily report distribution email to Superintendent Larry Snelling and other CPD Deputy Chiefs and Commanders attaching previous day's "Beat Group Service Call Traffic Stop Counts" (March 26, 2024).

forward. While discovery in this matter is not completed, I have reviewed and based my conclusions on the following data and examples.

39. Based on my review of the Declaration of Dean Knox, Ph.D., I understand that his analysis demonstrates that Chicago's police "districts with a lower share of white residents tend to make higher traffic stops." Knox Decl. ¶ 39. The police districts with the greatest numbers of traffic stops per officer in the relevant period are Districts 7, 10, 15, 6 and 11 (in that order), all of which are on the West and South sides of Chicago and have more than 90% non-white residents. *Id.* Table 3, Fig. 7. Similarly, drivers who live in ZIP codes with the highest proportions of non-white residents are "far more likely to be subjected to CPD traffic stops than those who reside in areas with larger white populations." *Id.* ¶ 40, Fig. 8, Fig. 9. As just one example, the per-capita traffic stop rate is 11.4 times higher in one ZIP code in the Austin neighborhood on the West side, where 93% of residents are Black and Latino people, compared to Streeterville, where most residents are white. *Id.* ¶ 40(d).

40. Professor Knox's Declaration, ¶ 29 and Fig. 2-3, also establishes that, citywide, Black and Latino drivers were approximately twice as likely to be stopped for alleged serious moving violations such as speeding, compared to white drivers committing similarly dangerous moving violations. *Id.* ¶ 33, Fig. 3-4. Black drivers were subject to at least 2.9 times more equipment stops and at least 3.5 times more license/registration stops as white drivers for every mile driven. *Id.* ¶¶ 35, 37. Black and Latino drivers were also disproportionately searched and frisked compared to white drivers, although CPD was more likely to find contraband—and weapons specifically—when searching white drivers and their cars. *Id.* ¶¶ 46-60.

41. I also base my conclusion that CPD targeted areas where the majority of the population is Black and Latino for pretextual traffic stops on CPD's documents and publicly-announced strategies, including but not limited to the following examples.

- a. On March 28, 2017, the Commander of District 2 (where the population is 70% Black people according to CPD's unit profile) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]³⁰ Based on my training and experience, I conclude that [REDACTED]

[REDACTED]

[REDACTED]

- b. The same tactics are evident in 2017 in District 10 (residential population 62% Latino and 34% Black according to CPD's unit profile), for example, where Commander James Sanchez ordered his leaders to utilize "traffic missions....tactical missions etc...." and "Assign vri [Violence Reduction Initiative officers] to also sit there tonite [sic]" to address a spate of violence at a specific location in November 2017.³¹ Based on my training and experience, I conclude that Commander Sanchez was commanding his units to conduct high volumes of pretextual traffic stops in District 10.

³⁰ Ex. 32 (CITY00349448-51), Email from District 2 Commander Crystal King-Smith to Deputy Chief of Area Central and [REDACTED] (March 28, 2017).

³¹ Ex. 33 (CITY00447637), Email from District 10 Commander James Sanchez to subordinate officers regarding traffic missions, tactical missions, and Violence Reduction Initiative assignments (November 5, 2017).

- c. Likewise, heading into 2018, the strategy in Districts 11 (residential population 83% Black and 13% Latino according to CPD's unit profile) and District 15 (residential population 93% Black and 4% Latino according to CPD's unit profile) was "to continue doing the strategies that have proven successful over the past year..." according to Deputy Chief of Area North Al Nagode, including "utilize traffic missions to attack main corridors used by gang members...."³² I interpret this document to mean that in these districts, where most of the residents are Black and Latino people, the strategy focused on pretextual traffic stops, frisks and searches to allegedly deter gang-related criminal behavior.
- d. On June 27, 2018, First Deputy Superintendent Anthony Riccio forwarded an email to his CompStat team attaching the department's daily traffic stop figures, stating:

Each day I go over this report in GREAT detail during my morning call with the Mayor. I'd like to incorporate this into compstat [sic] in a prominent way. From doing it every morning, I've noticed that there is often (not always...but enough to notice) a correlation between the number of stops a District has, the number of guns they recover, and the number of shootings they have. For example, 002, 003, and 005 have blown up recently, but their traffic stop numbers are terrible.... Let's use it to pat the good ones on the back, and point out the bad ones...³³

Based on my training and experience, I conclude from this document that First Deputy Superintendent Riccio was instructing his team to pursue a strategy of saturating traffic stops specifically in District 2 (residential population 70% Black

³² Ex. 34 (CITY00406990-91), Email from Deputy Chief of Area North Al Nagode to Chief Waller and other Commanders regarding enforcement plan for Districts 11 and 15 (January 10, 2018).

³³ Ex. 35 (CITY00063389-90), Email from First Deputy Superintendent Anthony Riccio to Office of Crime Control Strategies Lieutenant John Deane and Deputy Chief Steven Caluris regarding Daily Traffic Stop Summary" (June 27, 2018).

according to CPD's unit profile), District 3 (residential population 91% Black) and District 5 (residential population 94% Black). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] in a district where the population is 94% Black people.³⁴

- e. Also in 2018, CPD's Community Policing Director Glen Brooks acknowledged: "When we [Chicago] have communities experiencing levels of violence, we do increase traffic enforcement."³⁵ I interpret this statement to confirm that CPD's strategy in 2018 was to continue to conduct high levels of pretextual traffic stops in neighborhoods where most residents are Black and Latino.
- f. In 2019, CPD's spokesman acknowledged that this strategy continued, and specifically that CPD "deploy[s] the highest number of officers" to so-called "high-crime districts, which results in greater enforcement activity in those areas," including traffic stops.³⁶ Again, based on my training and experience, I understand this statement to mean that in 2019, CPD deployed high volumes of pretextual traffic stops to areas where most residents are Black and Latino.

³⁴ Ex. 76 (CITY00312143-51), Email chain between District 5 Commander Joel Howard, First Deputy Superintendent Anthony Riccio, and other CPD Chiefs and Commanders [REDACTED] (December 5, 2018).

³⁵ Pascal Sabino, *West Side Drivers Are Stopped by Cops the Most in Chicago. But 94% of Stops Don't Lead to Tickets*, Block Club Chi. (Nov. 18, 2021), <https://blockclubchicago.org/2021/11/18/west-side-drivers-are-stopped-by-cops-the-most-in-chicago-but-94-of-stops-dont-lead-to-tickets>.

³⁶ Jeremy Gorner, *While Pedestrian Stops by Chicago Police Plummeted, Officers' Traffic Stops Soared, ACLU Says*, Chi. Tribune (Jan. 14, 2019), <https://www.chicagotribune.com/news/breaking/ct-met-chicago-police-traffic-stops-20190111-story.html>.

g. On June 19, 2020, the commander of Police District 10 (Ogden), on the West Side where 62% of the residents are Latino and 34% are Black (according to CPD's unit profile), [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]³⁷

42. These examples are intended to illustrate the pervasiveness of the pretextual traffic stop strategy. While my analysis is ongoing, it is fair to say there are far more examples I could have selected and presented.

43. In addition to these examples from particular districts, CPD also utilized "citywide" teams in a manner that concentrated very high numbers of pretextual traffic stops in areas where most residents are Black and Latino people because these specialty teams were deployed mostly in areas where Black and Latino people live. For instance, Chief of Patrol Brian McDermott, who held that position from July 2020 through March 2024, testified that the Community Safety Team was created in 2020 out of the City's former "area gun teams and saturation teams."³⁸ McDermott deployed the Community Safety Team "primarily [in] South Side and West Side districts," ultimately "dwindling down" to the point where CST was operating almost exclusively in three districts: District 7 (residential population 96% Black, 2% Latino according to CPD's unit profile), District 10 (residential population 62% Latino, 34% Black according to CPD's unit profile) and

³⁷ Ex. 36 (CITY00101977-79), Email from District 10 Commander Gilberto Calderon to Officer Rita Hale [REDACTED] (August 29, 2020).

³⁸ Ex. 37 (WILKINS00036067-98), Transcript of Dep. of Brian McDermott at 32:22-32:23, *Paz v. City of Chicago*, (2021-L-514) (May 13, 2024).

District 11 (residential population 83% Black and 13% Latino according to CPD's unit profile).³⁹ According to testimony from one CPD sergeant, 60% to 70% of the police work of the Community Safety Team was making traffic stops.⁴⁰

44. Chief McDermott announced at a July 2021 City Council hearing that CPD's summer public safety "plan" was to concentrate its Community Safety Team and Summer Mobile Team, as well as CPD's specialized units, in the "15 most violent ... neighborhoods" of Chicago.⁴¹ Chief McDermott stated that these neighborhoods were: Austin, Auburn Gresham, Chatham, Chicago Lawn, Englewood, West Englewood, East Garfield Park, West Garfield Park, Greater Grand Crossing, Humboldt Park, Near North Side, Near West Side, North Lawndale, Roseland, and South Shore. In all but one of these neighborhoods (Near North Side), the majority of residents are Black or Latino people. The goal for this style of deployment, according to Chief McDermott, was to "get [CPD's] activity," which he defined as CPD's arrests, investigatory stops, and traffic stops, "to mirror where violent crime is occurring."⁴²

45. Then-CPD Superintendent of Police David Brown, who was present at the 2021 City Council hearing, repeated Chief McDermott's remarks, emphasizing that the focus was specifically on traffic stops. "We really want our traffic stops to mirror where violent crimes [are] occurring," he stated.⁴³ Based on my training and experience, I conclude that CPD's 2021 traffic stop strategy as described by Superintendent Brown and Chief of Patrol McDermott was simply a continuation of its mass traffic stop program because it involved saturating neighborhoods where

³⁹ *Id.* 36:17-28; 37:8-11.

⁴⁰ Ex. 38 (WILKINS0000313-346), Transcript of Dep. of Sgt. Daniel Skupien at 32:3-33:4, *Paz v. City of Chicago* (2021-L-514) (March 22, 2022).

⁴¹ Statement of Chief of Bureau of Patrol Brian McDermott on July 2, 2021 at 1:05:00, <https://vimeo.com/showcase/6277394/video/567694245>.

⁴² *Id.*

⁴³ Statement of Superintendent Brown on July 2, 2021, at 2:38:35, <https://vimeo.com/showcase/6277394/video/567694245>.

most of the population is Black or Latino with pretextual traffic stops, as CPD had been doing since 2016.

46. In 2022, CPD officials and then-Mayor Lori Lightfoot announced another, “new” public safety strategy of saturating deployments (including high volumes of pretextual traffic stop missions, as described in the following paragraph), again, on the West and South Sides of the city. Specifically, the Mayor and CPD Superintendent announced that CPD would be saturating deployments of officers on 55 police beats on the West and South Sides of the city, which have majority residential populations of Black or Latino people. The neighborhoods encompassed by CPD’s announced “55 beats” plan in 2022 included Districts 3, 4, 5, 6, 7, 8, 9, 10, 11, 15 and 22 (Auburn Gresham, Austin, Avalon Park, Bridgeport, Calumet Heights, Chicago Lawn, Englewood, West Englewood, East and West Garfield Park, Greater Grand Crossing, Humboldt Park, Near West Side, North and South Lawndale, Pullman, West Pullman, Riverdale, Roseland, South Chicago, South Shore, Woodlawn, and Washington Heights).⁴⁴

47. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁴⁴ Ex. 77 (WILKINS00027293-98), CPD FOIA Response letter to ACLU and produced records of CPD’s analysis of the 55 most violent beats (November 29, 2022).

⁴⁵ Ex. 39 (CITY00285965-69), Email from District 8 Commander’s Office to District 8 Lieutenants [REDACTED] (December 26, 2022).

[REDACTED]⁴⁶ [REDACTED]

[REDACTED]

[REDACTED]

48. Based on my training and experience, I conclude that CPD's decision to [REDACTED] [REDACTED] was simply a continuation of its mass traffic stop program because it consisted of conducting high volumes of pretextual traffic stops in areas where most of the residents were Black or Latino people.

49. As of June 7, 2023, CPD reduced the number of Top Beats to 35, while retaining the PDO Box program.⁴⁷ [REDACTED]

[REDACTED]

[REDACTED]⁴⁸ Based on the documents I reviewed, CPD continued to use the Top 35 Beats framework in 2024 and the Top 35 beats had not changed as of that time.⁴⁹ [REDACTED]

[REDACTED], and also has among the highest numbers of traffic stops per officer. Knox Decl. ¶ 39, Table 3, Fig. 7. I conclude that this is an intentional strategy, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁵⁰

⁴⁶ *Id.*

⁴⁷ See Ex. 40 (CITY00269793-96), Email from District 7 Commander Lewis Courts to Chief of Patrol Brian McDermott attaching report regarding Top 35 Beats in District 7 (June 7, 2023).

⁴⁸ Ex. 41 (CITY00190225), Strategic Decision Support Center briefing slide [REDACTED] (November 14, 2023).

⁴⁹ Ex. 42 (CITY00031337-44), Chicago Police Department Mayor's Meeting Presentation including slides for "Homicides & Shootings in 2023 Top 35 Beats & PDO Boxes"(April 17, 2024).

⁵⁰ See Ex. 43 (CITY00131241-53), Email from District 11 Officer to Commander Davina Ward [REDACTED] (September 30, 2023).

50. Also in or around 2023, CPD renamed the Community Safety Team (discussed above) the “Priority Response Teams (PRT),” and put them under the control of Area Commanders, but those teams continued to be deployed mostly in beats where the majority of the residents are Black and Latino people, and its officers continued to spend a significant portion (at least one-third) of their time conducting traffic stops as of 2024.⁵¹ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁵² [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁵³

51. In sum, it is my conclusion, based on my law enforcement training and experience and the CPD and other documents I have reviewed (summarized and cited above), that from 2016 to the present, CPD instructed its officers to police proactively by saturating areas with significant majorities of Black and Latino residents with pretextual traffic stops of vehicles for low-level traffic violations such as equipment and registration issues or loud sound systems, with the goal of conducting searches to locate weapons or other contraband and/or impound the drivers’ cars. For this reason, I conclude that CPD has enacted a continuous policy, from 2016 to the present, of

⁵¹ See Ex. 38 (WILKINS00036067-267), Transcript of Dep. of Brian McDermott at 32:3-33:4 (May 13 2022); see also Tom Schuba, *Chicago’s top cop halting initiative that has sent ‘scarecrow’ police cars downtown*, Chicago Sun-Times Jan. 29, 2024, <https://chicago.suntimes.com/crime/2024/1/29/24054743/chicago-top-cop-pulling-scarecrow-police-cars-downtown>.

⁵² See Ex. 44 (CITY00430540-42), Email from Office of Deputy Chief of Area 1 Frederick Melean to Area 1 Community Safety Team Supervisors, District Commanders, Area 1 Captains [REDACTED] (November 19, 2023).

⁵³ See Ex. 45 (CITY000348727-28), Email from Bureau of Patrol officer to District 3 Lieutenants [REDACTED] (August 30, 2024) (emphasis added).

conducting extremely high volumes of traffic stops, frisks, and searches concentrated in Chicago neighborhoods where Black or Latino residents predominantly live.

The Mass Traffic Stop Program Involves “Activity” Targets and Quotas for Traffic Stops

52. Another signature of the mass traffic stop program, between 2016 and the present, has been the use of “activity” targets or quotas for traffic stops. Specifically, CPD has required continuous reporting and monitoring of each officer’s and each unit’s traffic stop “activity” and rewarded those with higher numbers of stops and punished (by demotion) those reporting lower numbers of traffic stops.

53. Traffic stop “activity” was monitored by CPD (including by its CompStat unit) and reported to the Mayor as frequently as on a weekly basis (and sometimes even more frequently). A compilation of various exemplar CompStat reports and email communications related to CompStat meetings, for the period 2016-present, showing this regular monitoring and reporting of traffic stop numbers and results, is attached hereto as Ex. 46

54. Typifying CPD’s approach to setting traffic stop targets and quotas, on October 22, 2021, Chief of Patrol Brian McDermott wrote to all CPD Deputy Chiefs and Commanders, “I need to report out the number of area traffic missions, joint traffic missions, joint tact missions, and the activity from those missions at Tuesday’s Mayor’s meeting. Each District should compile and send this information to the Area. Each Area should report totals back to admin142 [a central email address] no later than 1400 Monday. **Ensure these missions continue on a regular basis as I will have to report the numbers weekly.**”⁵⁴

⁵⁴ Ex. 47 (CITY00052731-33), Department-wide email from Chief of Patrol regarding “Area Traffic Missions” (October 22, 2021) (emphasis added).

55. As described above, this daily and/or weekly data reporting and tracking was a key element of Milwaukee's pretextual traffic stop program that CPD adopted in April 2016.⁵⁵ CPD leadership copied that strategy and reiterated the importance of data reporting and tracking in the key CPD memos from June 2016 (Ex. 12) [REDACTED] (Ex. 16). And, as detailed below, it is reflected in internal CPD communications from 2016 to the present.

56. CPD leadership's scrutiny of daily traffic stop reports resulted in significant pressure by commanding officers on their subordinates to make more and more traffic stops. They punished officers who completed too few traffic stops with demotion. As only a few examples of this type of communication, I provide the following instances:

- a. On December 18, 2017, District 11 (residential population 83% Black and 13% Latino according to CPD's unit profile) Commander Kevin Johnson emailed lieutenants and sergeants under his command, "**On each Watch, ensure that we have dedicated traffic missions** in the areas where we are seeing our violence. SDSC Room personnel will develop a "heat map" and/or analysis of where our violence is occurring for traffic mission deployment purposes. **It appears that 011 ranking for traffic missions has fallen in the last month.** Traffic Mission results are to be forwarded to SDSC Room for tabulation for the Daily SDSC Briefing."⁵⁶
- b. On April 12, 2018, District 7 (residential population 96% Black according to CPD's unit profile) Commander Kenneth Johnson scolded the lieutenants in his

⁵⁵ Ex. 10 (CITY00168918-20), Email from Deputy Chief David McNaughton to First Deputy Superintendent John Escalante, Chief of Patrol Fred Waller, and Chief of Staff James Roussell regarding Milwaukee Police Department traffic stop tactic (April 20, 2016). Referring to Milwaukee, CPD Deputy Chief McNaughton describes: "They daily track the number of stops citywide and by each district, and produce a daily report that is similar to a quick stat but is broad in that it covers citywide data and district data. The report is sent out to each command daily..." *Id.*

⁵⁶ Ex. 48 (CITY00056445-46), Email from District 11 Commander Kevin Johnson to District 11 Lieutenants and other officers regarding previous day's Daily Traffic Stop Summary (December 18, 2017).

district for “the recent reduction in the average number of Traffic Stops made (or documented) in the 007th District.” This prompted a detailed response from the third watch lieutenant, who analyzed the number of “TSSS cards” (forms that CPD uses to document traffic stops) completed per officer per day on the night shift. But Commander Johnson was not satisfied with that answer and demanded a “face to face discussion” to press his subordinate for more traffic stops, allegedly for the purpose of reducing vehicle hijackings and robberies in the 7th District.⁵⁷

- c. On July 26, 2019, District 11 (residential population 83% Black and 13% Latino according to CPD’s unit profile) Commander Darrel Spencer emailed his lieutenants the previous day’s activity report,⁵⁸ which includes a data table showing the number of stops made by each officer, unit and each watch. Regarding the previous day’s activity, Commander Spencer stated, “Lt’s, **Second watch traffic stops have been minimal lately.** Are the cars going down on stops, hitting the t stop button on the pdt or running missions? Please check into this. Traffic stops are an effective tool use against gun violence in problem areas.”⁵⁹
- d. In Fall 2020, District 3 (residential population 91% Black, 4% Latino according to CPD’s unit profile) Commander Evelynna T. Quarterman, sent an email to her subordinates directing that “traffic missions,” i.e., targeted pretextual traffic stops, must occur every single day on every single watch. “Please ensure during these missions that the officers go down on the air stating that they are on a traffic stop,

⁵⁷ Ex. 49 (CITY00146817-21), Email from District 7 Commander Kenneth Johnson to Lieutenant Curtis Mullenix regarding plan to increase traffic stops (April 12, 2018).

⁵⁸ Ex. 50 (CITY00050844-46), Email from District 11 Commander Darrell Spencer to Lieutenants and attached traffic stop report from previous day (July 26, 2019).

⁵⁹ *Id.* at CITY00050844 (emphasis added).

with the location. The Sergeants will gather the information and submit [sic] to the WOL [watch operations lieutenant], who will compile the information in an email to the District Commander, who will send the daily report up [sic] the Area Deputy Chief's Office. . . . The missions and data gathering process will continue until further notice. WOL's, Field Lieutenant's, Tactical Lieutenant, and all Sergeants will be held accountable for this task to be successful!"⁶⁰

- e. Deputy Chief of Area 4, Ernest Cato III, emailed Area 4 commanders under his direct supervision frequently—sometimes multiple times per day—in the period between August and October 2020, encouraging them to report, focus on, and increase the total numbers of traffic stops made by patrol officers, as well as officers in specialized teams, such as tactical units. Area 4 on the West Side of Chicago comprises Districts 10 (residential population 62% Latino, 34% Black according to CPD's unit profile), 11 (residential population 83% Black, 13% Latino) and 15 (residential population 93% Black, 4% Latino). On Sunday August 9, 2020, Cato emailed the District 10, 11 and 15 Commanders to inform them that their traffic stop numbers were "not sufficient." Cato directed the Commanders to "give your WOLs [Watch Operations Lieutenants] daily reminders about the importance of traffic stops."⁶¹
- f. On September 9, 2020, Cato forwarded traffic stop totals from the CompStat unit to the same District 10, 11, and 15 Commanders, stating: "Look at your traffic stop

⁶⁰ Ex. 51, Fall 2020 email from District 3 Commander Evelynna T. Quarterman regarding traffic mission activity reporting (emphasis added).

⁶¹ Ex. 52 (CITY00143941-49), Email from Deputy Chief of Area 4 Ernest Cato to Commanders regarding previous day's Daily Traffic Stop Summary, forwarded by District 10 Commander Gilberto Calderon to Lieutenants (August 9, 2020).

strategy and be prepared to address how you will utilize traffic stops to address violence. Effective traffic stops sill [sic] decrease violence.”⁶²

- g. The next morning, on September 10, 2020, Cato again [REDACTED]
[REDACTED] District 10, 11, and 15 Commanders, [REDACTED]
[REDACTED]⁶³ Later that same afternoon, Cato again
emailed the same three Commanders: “The attached document is a breakdown of
traffic stops per watch in your districts. Please ensure all units are going down on
stops. Tact [tactical team] is drastically low, which is may be [sic] a result of them
not going down on their stops.”⁶⁴ One Commander replied to Cato, “We trying Sir
[sic].”⁶⁵ The Commander suggested that his district’s traffic stop totals would be
higher if he could include the totals within his district from the citywide Summer
Mobile Unit and Community Safety Teams, because, in his words, “all they do” is
traffic stops.⁶⁶
- h. On September 20, 2020, Cato emailed the District 11 (population 83% Black, 13%
Latino) Commander, “Please look into your tact teams [sic] traffic stops.”

⁶² Ex. 53 (CITY00120432-33), Email from Deputy Chief of Area 4 Ernest Cato to Commanders regarding previous day’s Daily Traffic Stop Summary, forwarded by District 10 Commander Gilberto Calderon to Lieutenants (September 9, 2020).

⁶³ Ex. 54 (CITY00120272-73), Email from Deputy Chief of Area 4 Ernest Cato to District 10, 11, and 15 Commanders [REDACTED] (September 10, 2020).

⁶⁴ Ex. 55 (CITY00122633-34), Email chain between District 15 Commander Patricia Wines and Area 4 Deputy Chief Ernest Cato and attached “15th District Traffic Stop Summary Report” (September 10, 2020).

⁶⁵ Ex. 56 (CITY00367042), Email from District 10 Commander Gilberto Calderon to Area 4 Deputy Chief Cato regarding traffic stops in Area 4 and discussing the Community Safety Team and Summer Mobile Unit (September 13, 2020).

⁶⁶ *Id.*

Commander Spencer replied: “That conversation has already been had with the new Lt. He’s going to have a meeting with the sergeants.”⁶⁷

- i. On October 2, 2020, Cato again emailed the District 11 Commander, [REDACTED]
[REDACTED]
[REDACTED]⁶⁸

Approximately 20 minutes after receiving the email from Cato, the District 11 Commander emailed all lieutenants in District 11 the following: “All, See attached report [summarizing daily traffic stop totals]. I know that manpower is a struggle but we can do better when it comes to traffic stops. . . . I’ve asked each WOL to assign cars to traffic missions and have those cars submit the activity to the ‘WOL’ prior to the end of their tour for review and discussion (with the assigned officers). . . . This will be placed squarely on the WOL to show an increase in our traffic related enforcement on your watch. . . . Tact should be leading the district in stops with the watches closely behind. 011 has the most violence and should be leading the city (Districts) in stops. ‘They are making the stops but not recording them’ is not a valid reason. Capt McKenzie see me about this matter today.”⁶⁹

- j. On October 4, 2020, Cato again emailed the same District 11 Commander with a summary of traffic stop totals, stating “please develop a plan to increase traffic stops on the first watch. I am sure this is not only being monitored by me,”

⁶⁷ Ex. 57 (CITY00289080-81), Email from District 11 Commander Darrell Spencer to Area 4 Deputy Chief Cato regarding the tactical team traffic stops (September 20, 2020).

⁶⁸ Ex. 58 (CITY00120497-98), Email from Area 4 Deputy Chief Cato to District 11 Commander Spencer [REDACTED] in District 11 (October 2, 2020).

⁶⁹ Ex. 59 (CITY00050678-86), Email from District 11 Commander Spencer to Lieutenant discussing need to increase traffic stops (October 2, 2020).

apparently referencing the Superintendent, Mayor, and/or other City and CPD leaders.⁷⁰

- k. According to testimony I have reviewed in related litigation, in or around January 2021, then-Superintendent David Brown communicated to then-Deputy Chief Barz that the Superintendent wanted CPD to conduct at least 10,000 traffic stops per week Department-wide.⁷¹
- l. On May 2, 2021, the District 10 (population 62% Latino, 34% Black) Commander emailed a lieutenant, “Figure it out but I need some violence prevention high visibility traffic stops from your watch. Each car that you have up barring any long term down on something should be patrolling and looking for traffic violations... anything to help out with prevention of violence and traffic violators are the easier and most visible to prevent violence. Thank you and get it done. I don’t ask much of your watch cuz I understand the hours and such but **something from each car.** These are young officers for the most part.....thank you in advance.”⁷²
- m. On July 22, 2021, the Commander of the Critical Incident Response Team wrote to the supervisors under his command, instructing: “Please remind our personnel of the importance of traffic stops. Traffic stops are a tool that must be used to decrease crime (shootings, robberies, vehicle hijackings...etc). It is necessary for each team/car to **increase their daily traffic stops** and to remain in their assigned

⁷⁰ Ex. 60 (CITY00319028-32), Area 4 Deputy Chief Ernest Cato to District 11 Commander Darrell Spencer and District 7 Commander Roderick Robinson requesting a plan to increase traffic stops in District 11 (October 4, 2020).

⁷¹ See Ex.61 (WILKINS0000113-236), Transcript of Dep. of Sgt. Stephen Boyd at 54:22-55:12, *Paz v. City of Chicago* (2021-L-514) (January 5, 2022).

⁷² Ex. 62 (CITY00052498), Email from District 10 Commander Calderon to Lieutenant Steven Cieciel regarding “Violence prevention Traffic Stops” (May 3, 2021) (emphasis added).

deployment box. These boxes have been identified by the District Commanders and boxes in need of assistance. Please thank the officers for their efforts.”⁷³

- n. On October 25, 2021, the Deputy Chief of Area One (covering Districts 2, 3, 7, 8 and 9 on the South Side, each of which has an significant majority of Black or Latino residents) wrote to the Area One commanders, “You are all responsible for entering the joint traffic and tactical missions. We cannot have zero missions.”⁷⁴ As explained above, the Deputy Chief was demanding more pretextual traffic stops.
- o. On January 26, 2022, Commander Rodney Hill of District 7 (residential population 96% Black) wrote to the Deputy Chief of Area One, Frederick Melean, recommending four tactical officers for demotion back to patrol assignments due to their “lack of productivity” “[a]fter analyzing the individual activity of each member of the Tactical Team from 2021/2022 to include arrest, traffic citations and firearms recovered.”⁷⁵
- p. On June 15, 2022, Chief of Patrol Brian McDermott emailed the Area 1 Commanders, “The Sup[erintendent] wants a daily to/from report submitted by the Area deputy Chief. The report should be submitted directly to the Sup, FDS, and myself by 0900 each morning. The report should contain how many traffic missions each district (005, 006, & 011) conducted, who supervised them (DC,

⁷³ Ex. 63 (CITY00051046-47), Email from Critical Incident Response Team Commander Darrell Spencer to Saturation and Gang Team Supervisors regarding previous day’s Daily Traffic Stop Summary (July 22, 2021) (emphasis added).

⁷⁴ Ex. 64 (CITY00048287-88), Email from Area 1 Deputy Chief Frederick Melean to Area 1 Command Staff and Lieutenants regarding “Area Traffic Missions” (October 25, 2021).

⁷⁵ Ex. 65 (CITY00160411), Memo from District 7 Commander Rodney Hill to Deputy Chief Frederick Melean regarding demotion of four District 7 Tactical Team officers (January 26, 2022).

Commander, or Captain), total activity for the missions, and a summary of what went good, what went bad, and what could be improved. **In addition, Each Deputy Chief, Commander, and Captain will directly supervise a minimum of 2 traffic missions per day.** Any questions, feel free to call.” (emphasis added).⁷⁶

These districts on the South and West sides have a majority of Black and Latino residents.

- q. Just days after issuing this reporting requirement, on June 21, 2022, Chief of Patrol McDermott emailed District 8 (residential population 59% Latino and 20% Black) Commander Brian Spreyne and District 11 (population 83% Black and 13% Latino) Commander Davina Ward, and their respective Area Deputy Chiefs Fred Melean and Patricia Wines, “The four of you are required to attend a 1000 daily briefing with the Sup[erintendent], FDS [First Deputy Superintendent], myself and Chiefs to discuss traffic stops and plans to increase your numbers. Invites should be on your calendars.”⁷⁷
- r. The *Chicago Tribune* reported in 2022 that Superintendent Brown used CompStat meetings in a manner similar to former Superintendent McCarthy, “push[ing] his commanders to get their officers to make more arrests and traffic stops” and threatening to “demote commanders for poor performance.”⁷⁸ The *Tribune* stated

⁷⁶ Ex. 66 (CITY00293564-65), Email from Chief of Patrol Brian McDermott to Area 1 Commanders regarding daily traffic mission requirements and reporting per request of the Superintendent (June 15, 2022) (emphasis added).

⁷⁷ Ex. 67 (CITY00083961), Email from Chief of Patrol McDermott Email to Area 1 and Area 4 Deputy Chiefs and District 8 and 11 Commanders requiring attendance at daily briefing with the Superintendent, First Deputy Superintendent, and Chief McDermott to discuss plans to increase traffic stops (June 21, 2022).

⁷⁸ Ex. 68 (WILKINS0033683-84), Jeremy Goner, *Chicago Police Leadership Places Many Tactical Officers Back in Patrol Cars Amid Struggle to Contain Violence*, Chicago Tribune (January 10, 2022).

that Superintendent Brown's statements in CompStat meetings were understood by officers to express an expectation that officers meet traffic stop quotas. *Id.*

- s. On January 19, 2022, the *Chicago Sun-Times* reported that a "shadow quota system" continues to be in place in CPD that emphasizes numbers of arrests, community interactions, and "more activity" from tactical officers.⁷⁹
- t. On or around March 19, 2022, Mayor Lightfoot summarized efforts she and the Superintendent personally made to hold CPD's tactical units "accountable" for traffic stop numbers by threatening adverse employment action for officers who were "not producing." The Mayor publicly said at a press conference that she was "very clear and blunt, as [was] the Superintendent. No one gets to sit it out. No one gets to sit it out. If you're not producing, if you're not making sure that you wake up every day and get on your shift to say, 'How can I do more? How can I do better? How can I make sure that I am moving the needle on violence in the areas in which I'm assigned?' Then we don't want them. They're in the wrong job. . . . Nobody gets to take, sit it out. They've got to be part of the fight. And, so, questions you should be asking when you go to your beat meetings, when you meet with your commanders, is, 'What's the productivity of the tactical teams?' And that will tell you a story. And we've been very clear, and the Superintendent has been very clear, if you're not gonna produce, if you're not gonna do your job, you're not gonna be on a tactical team."⁸⁰

⁷⁹ Ex. 69 (WILKINS0024589-93), Tom Schuba, *CPD Leaders Say They've Lost Faith in Supt. Brown: "I Can't Think of One Member of the Command Staff That is Willing to Back Him,"* *Chicago Sun-Times* (January 19, 2022).

⁸⁰ See City of Chicago West Side Community Safety Town Hall - YouTube at 1:02:39, <https://www.youtube.com/watch?v=3SSqvynDLZs>.

- u. On January 9, 2023, the District 7 (population 96% Black) Commander forwarded the recent Area One “Traffic Mission Activity” data report (which had also been distributed to the Superintendent and Chief of Patrol) to the District Lieutenants, and stated, “All, I've attached the traffic mission information compared to the other districts in the area for your knowledge. We need to get moving in the right direction regarding traffic stops with the increase in vehicular hijackings/vehicle thefts going on in the district. I can't stress how important our actions in the community need to be proactive as opposed to reactive regarding traffic enforcement.”⁸¹
- v. On September 6, 2023, the District 1 Commander emailed all District 1 lieutenants, “Lt's attached is an analysis of the criminal damage to vehicle pattern occurring in the 001st District. The majority are occurring on 1st watch, but they are still occurring on 2nd and 3rd watch. This pattern has to be our number 1 priority. Please increase traffic stops in the areas of this pattern. I need a daily email from each watch on what your activity is in relation to this pattern. If we put some effort in to this pattern, we should be able to stop it! Send the email to admin001 [a CPD District 1 email address], the captain and myself daily. Thank you again for what you and your officers do every day!”⁸²

57. Based on the documents reviewed, which end on August 30, 2024, up to and including that date, CPD continued its daily aggregation and distribution of the traffic stop activity

⁸¹ Ex. 70 (CITY00402169), Email from District 7 Commander Rodney Hill to Lieutenants regarding traffic mission activity in Area 1 (January 9, 2023).

⁸² Ex. 71 (CITY00395590), Email from District 1 Commander David Harris to Lieutenants discussing incidents of criminal damage to vehicles and directing Lieutenants to increase traffic stops and send daily activity reports via email (September 6, 2023).

reporting ranking districts, units, and individual officers based on numbers of stops throughout the entire relevant period.⁸³

58. CPD leadership took steps to ensure the goal of increasing pretextual traffic stops was well known throughout the Department; as one recurring example, CPD leadership awarded officers with particularly notable traffic stops with a “traffic stop of the month award” on several occasions.⁸⁴

59. Based on my training and experience, it is my opinion that CPD’s instructions for officers to increase their “activity” or “productivity” and setting goals and targets functions as a quota system that requires officers to conduct high volumes of pretextual traffic stops.

60. Based on my training and experience, I further conclude that CPD’s practice of demoting officers who make fewer traffic stops, or rewarding officers who make more traffic stops, is a quota system that encourages officers to conduct high volumes of pretextual traffic stops. This quota system reinforces a culture where officers are evaluated not on the quality or legality of traffic stops but on the sheer volume of stops.

**The Plaintiffs’ Traffic Stops Are Consistent With and Resulted From
CPD’s Mass Traffic Stop Program**

61. I have reviewed the declarations of the named Plaintiffs submitted together with this report. Ex. C-G.

⁸³ See Ex. 72 (CITY00105324-33), Report distribution email to Superintendent and other CPD Deputy Chiefs and Commanders attaching previous day’s “Beat Group Service Call Traffic Stop Counts” (August 30, 2024).

⁸⁴ See e.g., Ex. 73 (CITY00310520-25), Email from Deputy Chief of Crime Control Strategies Steven Caluris to First Deputy Superintendent Kevin Navarro and attached District 10 CompStat “Fact Sheet” including Traffic Stop of the Month Award (September 22, 2016); Ex. 74 (CITY00157347-48), Email from District 10 Commander William Betancourt to/from officer Robert Brown and Sergeant Gregory Strelczyk regarding “Traffic stop of the month” (December 29, 2022); and Ex. 75 (CITY00115881-98), Email from District 17 Commander Ronald Pontecore to Chief of Patrol Brian McDermott and attached Traffic Stop of the Month nominations (March 28, 2019).

62. Based on those declarations and my training and experience, I conclude that the traffic stops to which the named Plaintiffs were subjected are consistent with and bear the hallmarks of CPD's mass traffic stop program. Specifically, the named Plaintiffs were generally stopped for low-level vehicular issues such as alleged equipment or registration/license plate violations. In the few cases in which officers claimed to have observed a moving violation, such as changing lanes or turning right on red improperly, the named Plaintiff denies committing such a violation and believes the allegation to be false and/or pretextual. None of the named Plaintiffs was stopped for alleged speeding or dangerous driving. Out of the nearly fifty traffic stops the Plaintiffs discuss in their declarations, almost none ended with a traffic ticket (sometimes known as a citation). Only in two instances did CPD take any enforcement action and both cases were dismissed. This pattern is consistent with CPD's written plans for the mass traffic stop program, namely, conducting high volumes of stops for minor traffic code violations in an effort to search cars and drivers for weapons and allegedly prevent violent crimes, but not writing tickets for alleged traffic violations.

63. Further, based on the Plaintiffs' declarations and Professor Knox's declaration, I understand that most of the stops of the named Plaintiffs occurred in police districts and beats on the West and South sides of Chicago where the majority residential population is Black and/or Latino. *See* Ex. B-G; Knox Decl. ¶ 39. This is consistent with CPD's mass traffic stop program, which focuses on conducting high volumes of stops allegedly in the areas with the most violent crime. Based on my training and experience, and the declaration of Dean Knox, I understand those districts/beats to overlap significantly with the areas where most residents are Black and/or Latino. Further, it is my conclusion that CPD's and the City of Chicago's leadership would be well aware

of the racial demographics of the areas targeted for high-volume traffic enforcement on the West and South sides of the city.

64. Each of the named Plaintiffs resided and resides within a neighborhood where the significant majority of residents is Black or Latino, and where CPD has saturated high volumes of pretextual traffic stops: Mr. Wilkins lives in the Roseland neighborhood on the far South Side (District 5) (Wilkins Decl. ¶ 2); Mr. Bell lives in Auburn Gresham on the South Side (District 6) and at the time this lawsuit was filed he lived in South Shore on the South Side (District 4) (Bell Decl. ¶ 2); Ms. Jefferson lives in Bronzeville/Grand Boulevard on the South Side (District 2) (Jefferson Decl. ¶ 2); Mr. Almanza lives in Little Village/South Lawndale on the Southwest Side (District 10) (Almanza Decl. ¶ 2); and Mr. Beasley lives in Humboldt Park on the West Side (Districts 11/25) and at the time this lawsuit was filed lived in Austin on the West Side (District 15) (Beasley Decl. ¶¶ 2-3).

65. Two of the named Plaintiffs, Mahari Bell and Jacquez Beasley, have been subjected to traffic stops also in the downtown/River North area. Bell Decl. ¶¶ 18-30; 34-45; Beasley Decl. ¶¶ 52-58. Based on Professor Knox's declaration, ¶¶ 41-45, Fig. 10, I understand that CPD's data indicates that Black drivers like Mr. Bell and Mr. Beasley are significantly more likely than white drivers to be stopped for alleged non-moving violations in Districts 1 (Loop) and 18 (River North) where Mr. Bell and Mr. Beasley were stopped.

66. I also understand that all of the named Plaintiffs have been stopped multiple times by Chicago police – sometimes multiple times in one week. This is consistent with the quotas that are characteristic of CPD's mass traffic stop program, which encourage officers to make more stops, regardless of whether the stop is likely to discover a serious violation of the law.

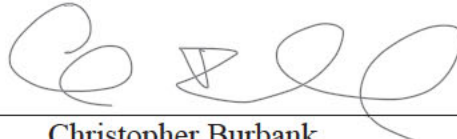
67. For these reasons, I conclude that the traffic stops that the named Plaintiffs experienced between 2016 and the date of this declaration are consistent with and the result of CPD's mass traffic stop program.

Conclusion

68. The data and conclusions in this declaration are based on the best information available to be at this time. My conclusions herein necessary are preliminary because discovery is ongoing in this matter. I reserve the right to update and refine my conclusions and the information on which they are based as the case proceeds.

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 7, 2025



Christopher Burbank

Table of Exhibits to Declaration of Chris Burbank in Support of Plaintiffs' Motion for Class Certification

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
1			Chris Burbank		Chris Burbank Curriculum Vitae	No
2	WILKINS0023522-44	March 2015	ACLU of Illinois		"Stop and Frisk in Chicago" Report	No
3	WILKINS0034042-50	August 15, 2015			Investigatory Stop and Protective Pat Down Settlement Agreement	No
4	CITY00112541-637	July 26, 2017	CPD Office of Crime Control Strategies	Unit Profiles for Week 29 - Citywide, Areas and Districts		No
5	CITY00415721-23	October 19, 2015	Deputy Chief of Patrol Fred Waller to Chief of Patrol Eddie Johnson	[REDACTED]	[REDACTED]	Yes
6	CITY00174428	January 14, 2016	Area Central Deputy Chief Kevin Ryan to District 8 Commander James C. O'Donnell	RE: Traffic Mission		No
7	CITY00353350-51	January 8, 2016	District 5 Sergeant to District 5 Commander Kevin Johnson	[REDACTED]		Yes
8	CITY00010171-82	January 1, 2016	CPD		Gang Violence Reduction Strategy (General Order G10-01)	No
9	CITY00043142-53	February 8, 2019	CPD		Gang Violence Reduction Strategy (General Order G10-01)	No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
10	CITY00168918-20	April 20, 2016	Deputy Chief David McNaughton to Chief of Patrol Fred Waller, Chief of Staff James Roussell, and First Deputy Superintendent John Escalante	Subject: FW: Vehicle Stops and Crime Reduction Attachments: Correlation Analysis.pdf; Daily Crime and Service Milwaukee.pdf		No
11	CITY00275474-76	April 3, 2016	First Deputy Superintendent John Escalante Email to Superintendent Eddie Johnson	Subject: Tier 2 Districts; Attachments: Tier 2 Strategies.docx		No
12	CITY00165372- 86	June 24, 2016	Deputy Chief David McNaughton, department-wide	Subject: FW: CompStat meeting of 23 June -Traffic Stop Tactic PowerPoint Attachments: Traffic Stops and Crime Reduction.ppt		No
13	WILKINS0036317-482, Excerpted	February 26, 2016			Excerpt of Deposition of Steven Caluris, <i>CANA v. City of Chicago</i>	No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
14	CITY00441908-09	June 25, 2016	Chief of Staff James Russell to Superintendent Eddie Johnson, First Deputy Superintendent John Escalante, Chief of Patrol Fred Waller, and Deputy Chief David McNaughton	[REDACTED]		Yes
15	CITY00174599-602	July 1 2016	Deputy Chief David McNaughton to First Deputy Superintendent John Escalante	Subject: FW: CompStat meeting of 23 June -Traffic Stop tactic PowerPoint Attachments: 29Jun2016 Traffic_Citywide (2).pdf		No
16	CITY00335816-29, Excerpted	August 10, 2016	District 5 Commander Kevin Johnson to Lieutenants	[REDACTED]		Yes
17	WILKINS0036522-76, Excerpted	May 31, 2016			Excerpt of Deposition of Garry McCarthy, <i>CANA v. City of Chicago</i>	No
18	CITY00042864-65	December 4, 2013	Sergeant Jill Stevens, Office of First Deputy Superintendent to All Units		General Message Administrative Notice of Ordinance Violation ANOV Quotas and Violence Reduction Initiative	No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
19	CITY00169662	September 30, 2016	Chief of Patrol Fred Waller Memo to All Deputy Chiefs, District Commanders, and Commanding Officers	Traffic Enforcement Missions for Violence Reduction Initiatives		No
20	WILKINS0036276-316, Excerpted	January 26, 2016			Excerpt of Deposition of Eddie Johnson, <i>CANA v. City of Chicago</i>	No
21	CITY00446578-80	June 1, 2016			[REDACTED]	Yes
22	CITY00414222-29	May 5, 2016			CompStat Slides on District 8 and 10 Impact Zones	No
23	CITY00349545-46	May 12, 2016	Memo from Violence Reduction Initiative North Lieutenant to Chief of Patrol Fred Waller	[REDACTED]		Yes
24	CITY00392196-97	April 17, 2016	Crime Prevention Information Center (CPIC) administrative account to CPD Superintendent and other leadership	[REDACTED]	[REDACTED]	Yes
25	CITY00042655	February 18, 2016			CompStat Slide Map [REDACTED]	Yes
26	CITY00041680	January 1, 2016			CompStat Slide Map of District 12 with Impact Zone #12	No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
27	CITY00205918-19	July 14, 2016			CompStat Slide [REDACTED]	Yes
28	CITY00392275-79	July 25, 2016	Deputy Chief of Bureau of Organized Crime Dana Alexander to First Deputy Superintendent John Escalante, Chief of Patrol Fred Waller, and Chief of Detectives Melissa Staples	[REDACTED]		Yes
29	CITY00042437	March 30, 2016			CompStat Map Slide of Districts 7 and 9 with Impact Zones	No
30	CITY00441236-39	December 6, 2016	Deputy Chief of Patrol George Devereux to Chief of Patrol Fred Waller	[REDACTED]		Yes
31	CITY00104189-98	March 26, 2024	Report distribution account to Superintendent Larry Snelling and other CPD Deputy Chiefs and Commanders	Subject: Beat Group Service Call Traffic Stop Counts Attachments: Beat_Group_Service_Call_Traffic_Stop_Counts-20240326.pdf		No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
32	CITY00349448-51	March 28, 2017	Email from District 2 Commander Crystal King-Smith to Deputy Chief of Area Central attaching Memo from Commander King-Smith to Chief of Patrol Fred Waller	[REDACTED]		Yes
33	CITY00447637	November 5, 2017	District 10 Commander James Sanchez to subordinate officers	No Subject	Instructions regarding traffic missions, tactical missions, Violence Reduction Initiative assignments, and the District 10 Strategic Decision Support Center room.	No
34	CITY00406990-91	January 10, 2018	Deputy Chief of Area North Al Nagode to Chief Waller and other Commanders	FW: Plan		No
35	CITY00063389-90	June 27, 2018	First Deputy Superintendent Anthony Riccio to Office of Crime Control Strategies Lieutenant John Deane and Deputy Chief Steven Caluris	FW: Daily Traffic Stop Summary		No
36	CITY00101977-79	June 19, 2020	District 10 Commander Gilberto Calderon to Officer Rita Hale	[REDACTED]		Yes

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
37	WILKINS0003606 7-98, Excerpted	May 13, 2024			Excerpt of Deposition of Brian McDermott, <i>Paz v. City of Chicago</i>	No
38	WILKINS0000313-46, Excerpted	March 22, 2022			Excerpt of Deposition of Sergeant Daniel Skupien, <i>Paz v. City of Chicago</i>	No
39	CITY00285965-69	December 26, 2022	District 8 Commander's Office administrative account to District 8 Lieutenants	[REDACTED]		Yes
40	CITY00269793-96	June 7, 2023	District 7 Commander Lewis Courts to Chief of Patrol Brian McDermott	Subject: Re: TOP 35 Beats Attachments: Violent Beats in 007.pdf		No
41	CITY00190225	November 14, 2023			SDSC Map Slide [REDACTED]	Yes
42	CITY00031337-44	April 17, 2024			Chicago Police Department Mayor's Meeting Slides [REDACTED]	No
43	CITY00131241-53	September 29, 2023	District 11 Officer to Commander Davina Ward		[REDACTED]	Yes

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
44	CITY00430540-42	November 19, 2023	Office of Deputy Chief of Area 1 Frederick Melean to Area 1 Community Safety Team Supervisors, District Commanders, Area 1 Captains	[REDACTED]		Yes
45	CITY00348727-28	August 30, 2024	Bureau of Patrol officer to District 3 Lieutenants	[REDACTED]		Yes
46	CompStat Exemplar Documents; Ex. 46-a to 46-ll	2016-2024				Yes: 46, 46-i, l n-o, q, s-w, aa, cc, ee, and ii No: 46-a-h, j-k, m, p, r, x-z, bb, dd, ff-hh, and jj-ll
47	CITY00052731-33	October 22, 2021	Chief of Patrol Brian McDermott, department-wide	Re: Area Traffic Missions		No
48	CITY00056445-46	December 18, 2017	District 11 Commander Kevin Johnson to District 11 Lieutenants and other officers	Subject: FW: Daily Traffic Stop Summary Attachments: 2017.12.18 1 Day.pdf; 2017.12.18 7 Day.pdf; 2017.12.18 28 Day.pdf; 2017.12.18 Traffic Stop Summary v2.pdf		No
49	CITY00146817-21	April 12, 2018	District 7 Commander Kenneth Johnson to Lieutenant Curtis Mullenix	Subject: Fwd: Vehicle Hijackings		No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
50	CITY00050844-46	July 26, 2019	District 11 Commander Darrell Spencer to Lieutenants	Subject: Fwd: 011 th District Traffic Stop Report - July 25 2019 Attachments: 25 JULY 2019 Commander's Traffic Stop Brief.pdf		No
51	WILKINS0036905	December 5, 2020	District 3 Commander Evelynna T. Quarterman			No
52	CITY00143941-49	August 9, 2020	Deputy Chief of Area 4 Ernest Cato to Commanders; District 10 Commander Gilberto Calderon to Lieutenants	FW: Daily Traffic Stop Summary		No
53	CITY00120432-33	September 9, 2020	Deputy Chief of Area 4 Ernest Cato to Commanders; District 10 Commander Gilberto Calderon to Lieutenants	FW: Daily Traffic Stop Summary		No
54	CITY00120272-73	September 10, 2020	Area 4 Deputy Chief Ernest Cato to District 10, 11 and 15 Commanders	FW: Daily Traffic Stop Summary		No
55	CITY00122633-34	September 10, 2020	Email chain between District 15 Commander Patricia Wines and Area 4 Deputy Chief Ernest Cato	Subject: Re: Area Four Traffic Stops (09SEP20) Attachments: 09Sep2020 - 15th District Traffic Stop Summary Report.pdf		No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
56	CITY00367042	September 13, 2020	District 10 Commander Calderon to Area 4 Deputy Chief Cato	Re: Area Four Traffic Stops (10-12 SEP 20)		No
57	CITY00289080-81	September 20, 2020	Area 4 Deputy Chief Ernest Cato to/from District 11 Commander Darrell Spencer	Re: Area Four Traffic Stops (17-19 SEP 20)		No
58	CITY00120497-98	October 2, 2020	Area 4 Deputy Chief Cato to District 11 Commander Darrell Spencer	FW: Daily Traffic Stop Summary		No
59	CITY00050678-86	October 2, 2020	District 11 Commander Darrel Spencer to Lieutenants	FW: Daily Traffic Stop Summary		No
60	CITY00319028-32	October 4, 2020	Area 4 Deputy Chief Ernest Cato to Commanders	[REDACTED]		Yes
61	WILKINS0000113-236	January 5, 2022			Excerpt of Deposition of Sergeant Stephen Boyd, <i>Paz v. City of Chicago</i>	No
62	CITY00052498	May 3, 2021	District 10 Commander Gilberto Calderon to Lieutenant Steven Cieciel	[REDACTED]		Yes
63	CITY00051046-47	July 22, 2021	Critical Incident Response Team Commander Darrell Spencer to Saturation and Gang Team Supervisors	[REDACTED]		Yes
64	CITY00048287-88	October 25, 2021	Area 1 Deputy Chief Frederick Melean to Area 1 Command Staff and Lieutenants	[REDACTED]		Yes

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
65	CITY00160411	January 26, 2022	Memo from District 7 Commander Rodney Hill to Deputy Chief Frederick Melean	007th District Tactical Team		No
66	CITY00293564-65	June 15, 2022	Chief of Patrol Brian McDermott to Area 1 Commanders	Traffic Missions		No
67	CITY00083961	June 21, 2022	Chief of Patrol McDermott Email to Area 1 and Area 4 Deputy Chiefs and District 8 and 11 Commanders	Re: In person daily briefing		No
68	WILKINS0033683-84	January 10, 2022	Jeremy Gorner, Chicago Tribune		<i>Chicago Police Leadership Places Many Tactical Officers Back in Patrol Cars Amid Struggle to Contain Violence</i>	No
69	WILKINS0024589-93	January 19, 2022	Tom Schuba, Chicago Sun-Times		<i>CPD Leaders Say They've Lost Faith in Supt. Brown: "I Can't Think of One Member of the Command Staff That is Willing to Back Him"</i>	No
70	CITY00402169	January 9, 2023	District 7 Commander Rodney Hill to Lieutenants	Subject: Fw: Traffic Mission Activity-Area One 08 Jan 23		No
71	CITY00395590	September 6, 2023	District 1 Commander David Harris to Lieutenants	Subject: Criminal Damage To Vehicle Attachments: Criminal Damage to Vehicles Lst.pptx		No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
72	CITY00105324-33	August 30, 2024	Report distribution account to Superintendent Larry Snelling and other CPD Deputy Chiefs and Commanders	Subject: Beat Group Service Call Traffic Stop Counts Attachments: Beat_Group_Service_Call_Traffic_Stop_Counts-20240830.pdf		No
73	CITY00310520-25	September 22, 2016	Deputy Chief of Crime Control Strategies Steven Caluris to First Deputy Superintendent Kevin Navarro	Subject: FW: 010th District Fact Sheet Attachments: 010 District Overview.doc; Quick Stat Report 21 SEP 2016.pdf; CompStat 10th District Week 37.pdf; 10th District CAPS. pdf	.	No
74	CITY00157347-48	December 29, 2022	District 10 Commander William Betancourt to/from officer Robert Brown and Sergeant Gregory Strelczyk	Re: Traffic stop of the month		No
75	CITY00115881-98	March 28, 2019	District 17 Commander Ronald Pontecore to Chief of Patrol Brian McDermott	Subject: Sgt nominations Attachments: Barber nomination Sgt.docx; Neberieza nomination Sgt.docx; Havelka nomination Sgt.docx		No

Ex. No.	Bates No. Beginning-End	Date	Author or To/From	Email Subject/ Attachments	Document Description	Filed Under Seal
76	CITY00312143-51	December 5, 2018	Email chain between District 5 Commander Joel Howard, First Deputy Superintendent Anthony Riccio, and other CPD Chiefs and Commanders.	[REDACTED]		Yes
77	WILKINS0002729 3-98	November 29, 2022	Chicago Police Department FOIA Officer to ACLU of Illinois	Re: Notice of Supplementary Response to FOIA Request FOIA File No.: P794393	CPD FOIA Response Letter and produced records of CPD's analysis of the 55 most violent beats	No