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April 20, 2022

Via Email

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Dear Counsel and Monitor Hickey:

We write this letter on behalf of the Coalition to provide written comments about the Chicago Police Department ("CPD") Bureau of Internal Affairs ("BIA") revised policy on conducting log number investigations, Special Order S08-01-01.

As you are aware, in November and December 2021, the Coalition submitted written comments on three related BIA policies: General Order G08-01, General Order G08-01-02, and Special Order S08-01. These policies took effect on December 31, 2021, without addressing the vast majority of the Coalition's recommendations. The Coalition continues to have serious concerns about CPD's BIA policies, and the revised Special Order S08-01-01 is no exception. We urge the City to make the changes described below—most of which we also presented in our November and December letters on the related policies. Without these changes, CPD officers will continue to evade accountability for wrongdoing.

As you know, the Coalition and CPD have agreed to meet to discuss Special Order S08-01-01. Before the meeting, we look forward to receiving CPD's written response to this letter to facilitate a substantive discussion about the Coalition's recommendations.

Structure of the BIA Policies

1) The BIA policies must be simplified and streamlined to clearly inform officers and investigators of their duties and expectations.

CPD must create one clear BIA policy. Currently, CPD has a tangle of overlapping BIA policies that cite other directives, thereby requiring constant cross-referencing to determine what is required, of whom, and when. This policy labyrinth frustrates the very goals the BIA policies are supposed to advance: ensuring accountability for officer misconduct and fostering community trust in CPD's complaint and disciplinary system. To achieve these goals, the policies must be streamlined into one clear and comprehensive directive.

BIA Investigator Jurisdiction

2) Only entities independent of CPD should investigate alleged sexual misconduct by CPD officers.

As the U.S. Department of Justice ("DOJ") described in its Chicago police investigation, BIA has a history of failing to investigate allegations of rape and closing investigations due to a survivor's "refusal to cooperate" after being threatened by the officer in question.[1] It is therefore imperative that sexual misconduct complaints are investigated by the Civilian Office of Police Accountability ("COPA") and other entities independent of CPD. Civilian control over sexual misconduct cases will help ensure complete investigations without intimidation, which is critical given that people often feel uncomfortable discussing and pursuing these sensitive complaints.[2]

In our November and December 2021 letters, we urged CPD to revise General Order G08-01-02 such that COPA, not CPD's BIA, would investigate sexual misconduct by Chicago police. Although CPD rejected this recommendation, we repeat it here now that the Chicago City Council has amended the Chicago Municipal Code to give COPA jurisdiction over sexual misconduct cases.[3] An outside entity such as the Illinois Attorney General's Office or the Illinois State Police should conduct any criminal investigation of sexual misconduct by Chicago police, with COPA retaining jurisdiction over the disciplinary investigation.

[1] U.S. Dep't of Justice, *Investigation of the Chicago Police Department* 79 (2017) [hereinafter "DOJ Report"].
[2] *See id.* at 69-70 ("For sexual misconduct in particular, victims may be reluctant to participate in the investigation because the nature of the misconduct and of investigations means that victims may have to retell intimate and embarrassing details numerous times to complete strangers.").
[3] Chi., Ill., Substitute Ordinance 2021-3993 (Feb. 23, 2022).

Support and Protections for People Who File Complaints

3) The BIA policies must require the provision of reasonable accommodations and supportive services to people who file complaints, including information about the complaint and investigation process, information about outcomes, and referrals to outside service providers.

Every person who files a complaint against a CPD officer should be informed about reasonable accommodations if they have a disability and assigned a complaint support specialist who will provide information, regular updates, and supportive services throughout the complaint and investigation process.[4] For example, a person who comes forward may benefit from a referral to a social worker or mental health professional, or they may need an accommodation such as a sign language interpreter. Federal law requires police departments to provide accommodations to persons with disabilities to ensure adequate and appropriate communication.[5]

Special Order S08-01-01, like the three policies we reviewed in late 2021, fails to provide that every person who files a complaint will be given information about reasonable accommodations, the investigation process and possible outcomes, and referrals to outside service providers. The policies must be revised to require these vital services.

4) Explicitly clarify that no one must file a sworn affidavit for a complaint against any *nonsupervisory* CPD member. Also clarify that no one will have to file a sworn affidavit for complaints against any *supervisory* CPD member after June 30, 2022, when the union contracts for these officers are scheduled to expire.

The BIA policies must reflect Illinois law which permits anonymous complaints and bans sworn affidavit requirements for complaints. In particular, Section 10-150 of the SAFE-T Act, amending the Uniform Peace Officers' Disciplinary Act, 50 ILCS 725/3.8(b), bans any sworn affidavit requirement for complaints against police officers and applies to all collective bargaining agreements or union contracts entered after July 1, 2021. In accordance with this Act, the 2021 union contract between the City and the Fraternal Order of Police, Chicago Lodge No. 7 ("FOP") does not require members of the public to provide a sworn affidavit in order to file a police misconduct complaint. While the union contracts for supervisory officers—Sergeants, Lieutenants, and Captains—do include a sworn affidavit requirement in Section 6.10, they will expire on June 30, 2022. Thus, any new union contracts will have to follow the SAFE-T Act.

Given the SAFE-T Act and the terms of the current FOP union contract, the BIA policies should explicitly state that no one must file a sworn affidavit for complaints against any *nonsupervisory* CPD member. The polices should also explicitly state that, once the union contracts for supervisory members expire on June 30, 2022, no one will have to file a sworn

[4] *See* Police Accountability Task Force, *Recommendations for Reform: Restoring Trust between the Chicago Police and the Communities They Serve* 82 (Apr. 2016) [hereinafter "Task Force Report"].

[5] 29 U.S.C. § 794 ("No . . . individual with a disability . . . shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance"); 42 U.S.C. § 12132 (similar prohibitions for public entities).

affidavit for complaints against *supervisory* members either. Special Order S08-01-01 must make clear the extremely limited scope of the sworn affidavit requirement because the Order's proposed effective date is December 30, 2022, *after* the current supervisory officer union contracts expire in June 2022.

Besides those explicit directions, several sections of the Special Order S08-01-01 must be revised because they incorrectly imply that sworn affidavits are broadly required, rather than required only for complaints against supervisory officers before the union contracts expire. *See, e.g.*, Special Order S08-01-01 §§ II.M.2 (defining complaint register as "the classification given to a Log Number by a BIA investigator or accountability sergeant after he or she completes the preliminary investigation and **obtains a sworn affidavit** or affidavit override, **or** determines that a sworn affidavit is **not** required to conduct a full investigation."); III.D.4.d (stating that "[e]ach" investigative file "**will**" contain "a signed sworn affidavit"—indicating that is the norm—before discussing what happens "[i]f there is no affidavit"); VI.A.3 (mentioning "the **exceptions** to the sworn affidavit requirement"); VIII.A (explaining what an investigator must do if they "obtain[] a signed sworn affidavit, sworn affidavit override, **or** [if] a sworn affidavit is **not** required") (emphasis added).

Finally, CPD's webpage that tells individuals how to file misconduct complaints must be revised immediately because it still says that state law requires sworn affidavits.[6] Not only is this direction contrary to Illinois law, as explained above, it also discourages the public from filing anonymous complaints.

Interviews and Investigations

5) A BIA investigator must not end a misconduct investigation until they have at least reviewed evidence such as body camera recordings, interviewed officers, and interviewed the person who filed the complaint (if the person wants to be interviewed).

Section VIII.B.11 of Special Order S08-01-01 allows BIA investigators and accountability sergeants to "terminat[e] the investigation when it is determined *at any time* that the incident is unfounded or if the member is clearly exonerated" (emphasis added). This provision should be revised to state that an investigation cannot be terminated until the BIA investigator or accountability sergeant interviews the accused officer, any officer witnesses, any officers otherwise involved in the incident, and the complainant (if that person wants to be interviewed), and reviews any body camera recording or other recording of the events in question.

In addition, Section VIII.B.8.c should be eliminated because it allows accountability sergeants to decide that accused officers may submit written statements in lieu of interviews. Section VIII.B.8.d should be clarified such that statements and To-From-Subject Reports may not be used as substitutes for interviews.

[6] Chicago Police Department, Filing a Complaint, https://home.chicagopolice.org/inside-cpd/filing-a-complaint/ (last visited Apr. 20, 2022).

6) Before being interviewed or giving a pre-interview statement, officers accused of misconduct should receive only a general overview of the allegations against them—not detailed allegations or all the evidence.

The BIA policies must not allow or enable officers to fabricate their stories before their interviews or pre-interview statements. Accordingly, officers accused of misconduct should not receive detailed allegations or evidence before their interviews or pre-interview statements—they should receive only a general overview of the complaint. Implementing this change will require revising Section VIII.B.8.a.(1).(a) of Special Order S08-01-01, which currently requires that accused officers receive "a copy of the specific allegation(s)" before any formal statement.

Section IV must also be revised. Section IV's prohibition on accused officers reviewing evidence applies until an officer is "notified by BIA that he or she is permitted to [review the evidence], or as may be required to testify as a witness in criminal or civil proceedings." But the provision does not specify *when* they may see the evidence. The bright line should be after the officer is interviewed or gives a pre-interview statement.

CPD must also remove Section IV.C's loophole that permits accused officers to look at evidence without BIA's permission if they are "completing incident reports or other documentation."

7) Ban officers from talking to each other about a complaint before all accused, involved, and witness officers have been interviewed or given a pre-interview statement.

Officers must not discuss misconduct complaints until all accused, involved, and witness officers have been interviewed or given a pre-interview statement. The DOJ Report noted several examples of officers colluding with one another after using deadly or serious force against a person—most notably in the aftermath of the murder of Laquan McDonald, the catalyst for the Consent Decree.[7] It also found that "[i]nvestigators' routine failure to explore the possibility of . . . other forms of witness contamination contributes to a culture in which officers have felt free to compare their accounts before meeting with investigators."[8] Without more restrictions in place, the BIA policies, including Special Order S08-01-01, enable contamination of officer statements and weaken the credibility of the investigation and the disciplinary process more broadly. The policies must specifically forbid officers from discussing the complainant, the incident, and the investigation with one another, as well as prohibit them from reviewing records and reports—or otherwise conducting review of the incident—before BIA has finished interviewing officers and/or taking their pre-interview statements.

Several sections of Special Order S08-01-01 highlight the absence of a prohibition on officers improperly conferring with each other. Section VIII.B.8.b.(2) assumes accused and witness officers may talk to anyone after an accusation, including other involved officers. The provision states that, in interviews, investigators must ask an officer "the identity of other persons with whom he or she has communicated regarding the incident in question, and the date, time,

[7] DOJ Report, *supra* note 1, at 57-58, 60.
[8] *Id.* at 61.

place, and content of such communication, subject to any evidentiary privilege recognized under Illinois or federal law." *See also* § VIII.B.8.d.(5).(a) (requests for written statements from accused officers or officer witnesses will include the same questions). And Section VIII.B.8.d.(3) gives accused officers 72 hours to prepare and submit a written statement after viewing or receiving allegations. Without a clear prohibition on improper discussions, officers may feel free to confer at any time, including during the 72-hour period when accused officers draft statements.

8) Do not give the accused officer the complainant's name or other identifying information before the officer's interview or statement.

Many people fear retaliation after filing a police misconduct complaint if the officer will learn their name.[9] Disclosure of a person's name or other identifying information can chill misconduct reporting. The BIA policies must address this understandable, well-documented concern about retaliation. Section VIII.B.8.a should state that the complainant's name and other identifying information will not be shared with the accused officer before the officer's interview. The Consent Decree strongly encourages the City and CPD to enact this change. *See* Consent Decree ¶ 475 ("The City and CPD will undertake best efforts to ensure that the identities of complainants are not revealed to the involved CPD member prior to the CPD member's interrogation."). In any investigation where CPD takes the accused officer's statement in lieu of an interview—which should not happen, as Recommendation 5 explains—the accused officer should not learn who complained until after the officer's statement.

This change will require amending Section 6.1(E) of the FOP union contract, Section 6.1(F) of the supervisory officer union contracts, and Section VIII.A.15 of Special Order S08-01.

9) Record all officer interviews during misconduct investigations—whether or not the officers are interviewed in person.

Special Order S08-01-01 must be revised to ensure that all officer interviews are recorded during misconduct investigations. Section VIII.B.4 provides for audio recording of interviews of non-CPD members, and Section VIII.B.8.b.(8) provides for audio recording of *in-person* interviews of sworn Department members. There should instead be one provision that requires recording *all* officer interviews—regardless of whether the interviews are in person or virtual. This change is important given the rise of virtual communications during the COVID-19 pandemic.

10) When an officer changes their story or leaves out important facts, the investigators must decide whether the officer has lied and must consider recommending discipline for lying.

BIA investigators and accountability sergeants must decide whether testifying officers are being truthful, based on all available evidence. Special Order S08-01-01, Section III.D.4.h.(3).(b)'s "NOTE" should be revised as follows: "All original statements, and any subsequent statements including amended or modified statements, must be considered by the investigator in ~~before~~ determining: (a) the credibility of the Department member's statements; (b) the materiality of any

[9] *Id.* at 52; Coalition for Police Contracts Accountability, *Recommendations for the City of Chicago & Law Enforcement Union Contracts* 3.

omission or statement deemed to be false; and (c) the degree of culpability for any omission or false statement (*i.e.*, whether the statement or omission was intentional). ~~a false statement was made willfully, and d~~Documentation of this consideration and evaluation shall be included in the investigative file."

Contrary to current Sections III.D.4.h.(3) and Section IX.A.1, investigators must consider any evidence that an officer lied and fully document and address any false statement, regardless of whether the statement is "clearly" false or whether the officer has a "known record" of lying. These provisions must also explicitly cover *omissions* of important facts along with outright falsehoods.

Finally, Section IX.E should be revised to make clear that, in determining the recommended sanction, the BIA investigator or accountability sergeant must consider whether the accused made a false statement during the investigation, the gravity of any false statement, and whether additional discipline for lying is warranted.

11) Investigators must consider the complete history of complaints and relevant investigative files about the accused officer, regardless of the outcomes of those older complaints and investigations.

Section IX.A.4 allows investigators to consider "select not sustained findings" to identify patterns of misconduct with respect to only three kinds of complaints—excessive force, criminal conduct, and verbal abuse under Chicago Municipal Code Section 2-78-100. In addition, Section IX.A.4 provides that these not-sustained findings may only be considered for 7 years after the date of the incident or 7 years after the violation was discovered, "whichever is longer." This provision must be revised such that investigators are required to consider the *complete* history of complaints and relevant investigative files concerning the accused officer, no matter what happened in those older proceedings and without any temporal restrictions. This will require changing Section 8.4 of the FOP and the supervisory officer union contracts.

The DOJ Report found that CPD's failure to adequately address officer patterns of negative behavior led to officers continuing to engage in negative behavior with impunity, sometimes escalating into serious offenses.[10] A separate Police Accountability Task Force found that, "[f]rom 2007-2015, over 1,500 CPD officers acquired 10 or more [complaints], 65 of whom accumulated 30 or more."[11] It is imperative that investigators consider all relevant information to determine an officer's credibility or identify any patterns of abuse or misconduct.

12) Respect people's desire to remain anonymous if they do not want to put their names on complaints.

As noted above, many people will be understandably unwilling to put their names on misconduct complaints out of fear of retaliation. Special Order S08-01-01 must be revised to

[10] *See* DOJ Report, *supra* note 1, at 114 ("First, CPD does not adequately and accurately identify officers who are in need of corrective action; and second, CPD does not consistently or sufficiently address officer behavior even where CPD identifies negative patterns. Because of these failures, CPD officers are able to engage in problematic behaviors with impunity, which can—and do—escalate into serious misconduct.").

[11] Task Force Report, *supra* note 4, at 12.

respect people's desire to remain anonymous. For example, Section VII.C should be edited as follows: "Once assigned, BIA investigators and accountability sergeants will attempt to establish communication with the reporting party/subject unless the reporting party/subject made clear they wish to remain anonymous." Section III.D.g's "NOTE" should state that an investigative file will include identifying information for anyone who refuses to provide a statement "only if that person consents." And Section VIII.F.5 should be updated to state that investigators will not: "close or unduly extend a Log Number investigation solely because the reporting party/subject seeks to withdraw the complaint or is unavailable, unwilling, or unable to cooperate with the Log Number investigation or because the reporting party wishes to remain anonymous. If the reporting party/subject is unable or unwilling to provide information beyond the initial complaint or wishes to remain anonymous, the Log Number investigation will continue based on available evidence in accordance with applicable Department directives, law, and collective bargaining agreements[.]"

13) Require prompt preliminary investigations and interviews of accused, involved, and witness officers. Limit requests to delay investigations.

Special Order S08-01-01 needs explicit requirements to ensure investigations proceed promptly while evidence is fresh. Section VIII.C states that investigations by accountability sergeants must be completed in 90 days, while Section VIII.D states that investigations by BIA investigators must be completed in 180 days. But both provisions allow for unlimited extensions, there are no criteria for granting extensions, and there is no timeline for completing preliminary investigations.

The DOJ Report found that BIA misconduct investigations went "unresolved for unreasonable amounts of time" and that BIA "[did] not appear to follow strict deadlines for the completion of various steps or the investigation as a whole."[12] This lack of deadlines caused investigations to drag on for years, "often transferring between several investigators before even basic steps [were] complete."[13] DOJ emphasized that delays can make it "impossible" to discover the truth as "memories fade, evidence is lost," and witnesses become hard to locate—thereby compromising BIA's ability to make strong disciplinary recommendations and undermining the claim that the City takes complaints seriously.[14]

CPD must add explicit policy provisions to ensure prompt preliminary and full investigations and to avoid unnecessary delays. To prevent delays and witness contamination, the policies must also allow officer interviews to take place during preliminary investigations, including preliminary investigations of anonymous complaints. Allowing accused officer interviews in preliminary investigations of anonymous complaints will require amending Section 9 of Appendix L to the FOP union contract.

[12] DOJ Report, *supra* note 1, at 73.
[13] *Id.*
[14] *Id.* at 74.

Criminal Conduct and Investigations

14) Continue BIA investigations even when there is a separate criminal investigation about the same misconduct.

Special Order S08-01-01 must be revised to ensure that BIA will not pause a misconduct investigation due to a parallel criminal investigation. Section VIII.B.7.a requires misconduct investigations to proceed alongside criminal investigations in most cases, but it has an exception for "specific circumstances that would jeopardize the criminal investigation." And while Section VIII.B.7.b requires documenting the rationale for pausing an investigation and informing a supervisor of the decision, the policy does not explain the supervisor's oversight role or list the requirements for demonstrating "specific circumstances" for investigatory pauses. CPD must add these safeguards to ensure BIA investigations do not halt because of vague or unwarranted concerns about interfering with parallel criminal investigations. The policy should also require supervisors to periodically review investigatory pauses and reopen an investigation if the justifications for a pause no longer apply.

BIA Findings and Recommendations

15) The BIA policies must explicitly require that the disciplinary recommendations of investigators be given deference, and that the Superintendent publicly explain the reasons for overriding a recommendation in writing within 30 days.

Section VII.A of General Order G08-01 provides that the Superintendent of Police retains discretion "to restrict the duties of sworn Department members in response to complaints," to review "recommendations for disciplinary action," and to take disciplinary action. The Police Accountability Task Force observed that, in most misconduct cases they reviewed, the final discipline imposed was lower than what BIA recommended.[15] The Task Force also noted that "[t]he fragmented system involving IPRA [now COPA], the Superintendent, BIA within CPD, numerous arbitrators and the Police Board compromises the strength and significance of the investigative findings and recommendations over time, and discourages systemic accountability and transparency."[16]

Special Order S08-01-01 must clearly state that the findings and recommendations of BIA investigators and accountability sergeants shall be given deference by each subsequent official or entity reviewing those findings and recommendations unless they are clearly erroneous or an abuse of discretion. Additionally, the policies must provide that, if the Superintendent seeks to override a recommendation, the Superintendent must provide BIA with written reasons for doing so within 30 days of receipt of the recommendations, and BIA shall immediately publish the Superintendent's response online.

[15] Task Force Report, *supra* note 4, at 87.
[16] *Id.*

16) BIA must give Cook County and federal prosecutors evidence undermining officers' credibility as witnesses in criminal cases, give the same evidence to the criminal defendants the officers testified against, and specify the process for providing this evidence.

The DOJ Report found that CPD had "no system in place to ensure that all officer disciplinary findings bearing on credibility, including Rule 14 findings, are supplied to the State's Attorney's Office and criminal defendants, even though this is required under *Giglio v. United States*, 405 U.S. 150 (1972)."[17] Section VII.B.3 of General Order G08-01 requires that BIA will simply establish and maintain a relationship with the Cook County State's Attorney's Office, the United States Attorney's Office, the courts, and other law enforcement agencies. It does not specifically require the provision of *Giglio* evidence to prosecutors nor does it provide a framework to ensure that communication occurs. Special Order S08-01-01 also lacks any such requirement or framework for turning over *Giglio* evidence. The BIA policies must require that BIA inform the State's Attorney's Office, U.S. Attorney's Office, and impacted criminal defendants of any disciplinary findings that bear on an officer's credibility. To ensure that these important disclosures occur, the policies must provide the specific mechanisms for how, when, and where the disclosures are provided to the relevant agencies.

BIA Investigation Feedback and Transparency

17) CPD must ask for and publish public feedback on how BIA investigators and accountability sergeants behave during investigations.

To increase community trust and improve the effectiveness of the investigatory process, BIA must seek feedback from members of the public who interacted with BIA investigators and accountability sergeants. This feedback must include their overall satisfaction with the process, their ability to access information, their treatment throughout the process, the investigator or sergeant's sensitivity to their circumstances, any instances of bias or discrimination on the part of the investigator or sergeant, and the ease with which one could make a complaint, as well as suggestions for improvement. BIA must publish the results of this feedback process at least annually, and CPD must analyze the feedback and revise the BIA policies based on the feedback received.

18) CPD must meaningfully engage with the community on the BIA policies and re-open the comment period for Special Order S08-01-01.

"Meaningful community involvement is imperative to CPD accountability and transparency." Consent Decree ¶ 422; *see also id.* ("Nothing in this Agreement should be construed as limiting or impeding community participation in CPD's accountability system, including the creation and participation of a community safety oversight board. OAG and the City acknowledge the significant work many of Chicago's community organizations have undertaken and are continuing to undertake, including work alongside CPD, in the area of police reform and accountability, and OAG and the City know this critical work will continue.").

[17] DOJ Report, *supra* note 1, at 76-77.

The Coalition's criticisms of CPD's inadequate community engagement are well known and longstanding. Against this backdrop, we take particular issue with the way in which CPD closed the public comment portal for Special Order S08-01-01 on March 28, even though CPD's website indicated March 29 would be the last day for public comments. Apparently this early closure was a mistake, one that must not be repeated. As we stated in a March 29 email to Michael Milstein, closing the portal prematurely impedes communities' ability to communicate their views on this critically important policy and may well have prevented Chicagoans' voices from being heard. Moreover, the premature closure probably confused, frustrated, and disheartened people who planned to comment on March 29—having relied on CPD's assurance that the portal would be open that day. Misleading the public discourages vital community feedback. To correct this mistake, the City must publicize that it is re-opening the portal for additional comments.

We urge the City to implement the Coalition's recommended edits to Special Order S08-01-01, related BIA policies, and the CPD webpage on filing misconduct complaints. We look forward to CPD's written response to this letter and our subsequent meeting.

Sincerely,

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On behalf of the Coalition