

AFFIDAVIT OF JONATHAN LEWIN

State of Illinois)
) ss.
County of Cook)

The affiant, Jonathan Lewin, after being sworn under oath, avers as follows:

1. I am a Deputy Chief in the Chicago Police Department's Bureau of Organizational Development. In this role, I oversee CPD's Information Services Division, Records Division, Evidence and Recovered Property Section, and Alternate Response Section (telephonic crime reports). I also serve as a board member of the International Association of Chiefs of Police Law Enforcement Management section and as a consultant to the United States Department of Justice Bureau of Justice Assistance.
2. My job responsibilities include overseeing all aspects of technology for CPD, including the systems and processes that support the electronic digitized database that documents investigatory stops and protective pat downs conducted by CPD members ("ISR database"). Between January 1 and June 16, 2016, the ISR database did not archive Investigatory Stop Reports that had been placed in "rejected" or "deficient" status by reviewing supervisors.
3. In response to the request of Judge Arlander Keys, who serves as the Consultant under the Investigatory Stops and Protective Pat Down Settlement between the City of Chicago, the Chicago Police Department, and the American Civil Liberties Union, CPD modified the processes that support the ISR database so that, beginning on June 16, 2016, ISRs that are placed in "rejected" or "deficient" status by reviewing supervisors are archived in the ISR database.
4. In response to the Consultant's request, CPD's Information Services Division also sought to identify and recreate any earlier versions of ISRs that were submitted between January 1 and June 16, 2016, placed in "rejected" or "deficient" status, and subsequently approved. When the ISR database went live on January 1, 2016, there were two mechanisms available for tracing the history of each ISR before final approval. The first mechanism was "status change history" that tracked exactly when an ISR was rejected and resubmitted but not the contents of the ISR at the time of the earlier submission. The second mechanism was an "audit log" that recorded each user's individual time-stamped change(s), including edits made to individual fields and the before and after values of those fields.
5. To reconstruct the earlier versions of ISRs, CPD's analysts used the "status change history" mechanism to identify the time windows between rejection and resubmission that contained the user edits associated with an earlier version of an ISR. The analysts then wrote a program that applied the individual field changes recorded in the "audit log" backward in time to derive the value of each field that existed during the relevant time window. The program then used these pre-existing values to recreate the earlier versions of the ISRs. CPD, through the City's Law

Department, produced those versions to the Consultant on August 8, 2016. Although the audit log CPD used to create these earlier versions was not intended as an archive, using the above-described program CPD was able to reliably recreate all earlier versions of ISRs approved between January 1 and June 30, 2016.

7. After receiving the Consultant's draft Report and Recommendations, CPD sought to validate its earlier conclusion that there were at most 2527 ISRs approved between January 1 and June 30, 2016 with earlier versions. Using the "status change history" mechanism described in paragraph 4 to identify all ISRs that were approved between January 1 and June 30, 2016 and had more than one submission in their history, CPD determined that 2662 ISRs with earlier versions were approved during this time period. It appears that CPD's prior determination that there were 2527 ISRs approved between January 1 and June 30, 2016 with earlier versions was limited to those ISRs that were recovered through the reconstruction process, and did not include the 135 ISRs with earlier versions available through the new archiving process introduced on June 16, 2016.

8. After receiving the Consultant's draft Report and Recommendations, CPD also sought to determine whether any of 4250 ISRs personally reviewed by the Consultant had earlier versions. Using the list provided by the Consultant on August 2, 2016, CPD used the "status change history" mechanism referenced in Paragraph 4 to identify all ISRs that had been rejected and resubmitted at least once. These were cross referenced with the list of 4250 ISRs to identify which of that smaller subset had prior versions. CPD determined that 227 of the 4250 ISRs personally reviewed by the Consultant had earlier versions. Those ISRs are listed in the attached spreadsheet.


9. Based on these subsequent efforts, I am confident that CPD has identified all ISRs approved between January 1 and June 30, 2016 with earlier versions, and that the total number of such ISRs is 2662.

DATED this 21st day of February, 2017.

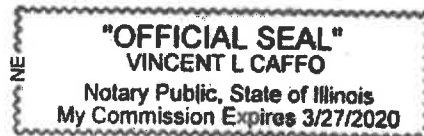


Jonathan Lewin

SUBSCRIBED AND SWORN TO before me on this 21st day of February, 2017.



Notary Public



2527- Candella
2662- Lewin / 54,701
(227/A, 250 sample ISRS)

REPORT_NO

ISRO00011857, ISRO00011937, ISRO00012053, ISRO00012392, ISRO00012409, ISRO00012456, ISRO00012597,
ISRO00012762, ISRO00013324, ISRO00013562, ISRO00013798, ISRO00013819, ISRO00014106, ISRO00014393
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