

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

AMERICAN CIVIL LIBERTIES
UNION OF ILLINOIS,

Plaintiff,

v.

CHICAGO POLICE DEPARTMENT,
CITY OF CHICAGO

Defendants.

COMPLAINT

NOW COMES Plaintiff AMERICAN CIVIL LIBERTIES UNION OF ILLINOIS (“ACLU”), through its undersigned attorneys, which brings this Freedom of Information Act suit to order Defendant CHICAGO POLICE DEPARTMENT (“CPD”) and Defendant CITY OF CHICAGO to release records related to CPD’s acquisition and use of social media monitoring software.

NATURE OF THE LAWSUIT

1. This is a complaint under the Illinois Freedom of Information Act (“FOIA”), 5 ILCS 140/1 *et seq.* In violation of FOIA, CPD delayed and ultimately failed to release certain records regarding CPD’s acquisition and use of software that enables CPD to monitor citizens’ social media accounts. The ACLU seeks an order commanding CPD to release the records and awarding the ACLU other appropriate relief.

2. Members of the public, including residents of Chicago, rely on social media services such as Facebook and Twitter (among others) to exchange information and ideas. The public uses social media to engage in constitutionally protected speech.

3. United States law enforcement agencies, from the FBI to local police, have a history of spying on American citizens and infiltrating or otherwise obstructing political activist groups.

Law enforcement agencies across America have monitored and harassed groups and individuals for doing no more than peacefully exercising their First Amendment rights.

4. CPD has acquired and used software designed to enable CPD to monitor citizens' social media accounts, and CPD maintains public records related to such acquisition and use.

5. CPD monitored citizens' social media accounts for content related to January 2017 protests of Donald Trump's presidential inauguration. Exhibit A contains true and correct copies of CPD First Amendment Worksheets from January 20–21, 2017, which reference such social-media monitoring.

6. CPD's monitoring of citizens' posts on social media—including any monitoring of citizens who are engaging in nothing more than a peaceful exercise of their First Amendment rights—is an issue of paramount importance in Chicago and elsewhere.

7. In order to evaluate police conduct and hold police accountable for any unjustified surveillance, it is critical that the public receive full and complete information about the police's monitoring of social media accounts.

8. Pursuant to the fundamental philosophy of the American constitutional form of government, it is the public policy of the State of Illinois that all persons are entitled to full and complete information regarding the affairs of government and the official acts and policies of those who represent them as public officials and public employees consistent with the terms of the Illinois Freedom of Information Act. 5 ILCS 140/1.

9. All public records of a public body are presumed to be open to inspection or copying. Any public body that asserts that a record is exempt from disclosure has the burden of proving by clear and convincing evidence that it is exempt. 5 ILCS 140/1.2.

10. Public bodies must respond to FOIA requests within five business days, or, if the criteria for an extension are met, within ten business days. 5 ILCS 140/3(d)–(e).

11. If the court determines that a public body willfully and intentionally failed to comply with FOIA, or otherwise acted in bad faith, the court shall impose upon the public body a civil penalty of not less than \$2,500 nor more than \$5,000 for each occurrence. 5 ILCS 140/11(j).

12. CPD violated FOIA by refusing to release documents related to its acquisition and use of social media monitoring software after making repeated bad faith statements that the documents would be released in short order.

PARTIES

13. The ACLU is an Illinois not-for-profit corporation. It is a non-partisan, statewide organization dedicated to protecting and expanding the civil rights and civil liberties enshrined in the U.S. and Illinois Constitutions. It is crucial to the ACLU’s mission that it receive timely information to keep its membership and the public apprised of developments and concerns in those areas.

14. CITY OF CHICAGO is a public body located in Cook County, Illinois.

15. CPD is a public body located in Cook County, Illinois. CPD is a department of CITY OF CHICAGO.

STATEMENT OF THE FACTS

16. On January 2, 2018, the ACLU requested from CPD certain public records (“the ACLU’s Request”). CPD received the ACLU’s Request on January 2, 2018, and it designated the ACLU’s Request with Reference No. P437616. A true and correct copy of the ACLU’s Request is attached as Exhibit B.

17. The ACLU’s Request sought the following records (“the Requested Records”):

- i. All contracts related to the purchase, acquisition, installation, maintenance, or use of social media monitoring software.
- ii. All invoices related to social media monitoring software.
- iii. All manuals, guides training materials, or other instructional records related to social media monitoring.
- iv. All policies governing access, use, or training related to social media monitoring software.
- v. All directives governing access, use, or training related to social media monitoring software.
- vi. All Open Source receipts (or other reports of usage) related to the use of social media monitoring software by the CPD Crime Prevention and Information Center since October 2017.

The ACLU's Request defined "social media monitoring software," "social media service" and "records," as shown in Exhibit B. The definition of "social media monitoring software" included any "application that enables the monitoring, searching, collection, or analysis of user-generated content located on social media services."

18. On January 3, 2018, CPD sent an email to the ACLU indicating that it would take FOIA's maximum permitted extension of five business days and that the ACLU would receive a reply on or before January 17, 2018. A true and correct copy of the extension letter is attached as Exhibit C.

19. On January 17, 2018, CPD sent an email to the ACLU indicating that the ACLU's Request was in process and that CPD would provide a response or update on or before January 24, 2018. A true and correct copy of the email is attached as Exhibit D.

20. On January 24, 2018, CPD sent an email to the ACLU indicating that CPD was awaiting a response from the Office of the First Deputy Superintendent of Police - Crime Prevention & Information Center (CPIC) regarding the ACLU's Request, and that CPD would provide a response or update on or before January 31, 2018. A true and correct copy of the email is attached as Exhibit E.

21. On January 31, 2018, CPD sent an email to the ACLU indicating that the ACLU's Request was in process and that CPD would provide a response or update on or before February 7, 2018. A true and correct copy of the email is attached as Exhibit F.

22. On February 7, 2018, CPD sent an email to the ACLU indicating that the ACLU's Request was in process and that CPD would provide a response or update on or before February 7, 2018. A true and correct copy of the email is attached as Exhibit G.

23. On February 13, 2018, the ACLU sent an email to CPD reminding CPD that the ACLU's Request had been pending since January 2, 2018. The ACLU indicated that it did not accept the indefinite delay asserted in CPD's weekly emails. The ACLU asked CPD to provide a date certain by which it would release the Requested Records. A true and correct copy of the email is attached as Exhibit H.

24. On February 15, 2018, CPD sent an email to the ACLU indicating that it had identified and been reviewing and processing documents responsive to the ACLU's Request and that CPD "hope[d] to have them for you in the next few business days." A true and correct copy of the email is attached as Exhibit I.

25. By March 12, 2018, CPD had not released the Requested Records. On March 12, 2018, the ACLU sent an email to CPD requesting a call to discuss the status of the ACLU's Request. A true and correct copy of the email is attached as Exhibit J.

26. On Tuesday, March 13, 2018, CPD sent an email to the ACLU indicating that it was currently reviewing and following up with several units to make sure it was not missing anything. CPD proposed a call at the end of the week if the ACLU had not heard from CPD before then. A true and correct copy of the email is attached as Exhibit K.

27. By Friday, March 16, 2018, CPD had not released the Requested Records. On the morning of Monday, March 19, 2018, the ACLU sent an email to CPD requesting a call later that day to discuss the status of the ACLU's Request. A true and correct copy of the email is attached as Exhibit L.

28. On March 19, 2018, CPD sent an email to the ACLU indicating that it could not participate in the requested call because its representative was "a bit under the weather and currently [had] no voice." CPD indicated that it was waiting to hear back from one more unit and, as soon as soon as it heard back, the responsive records would be ready to be approved for release. A true and correct copy of the email is attached as Exhibit M.

29. As of the filing of this Complaint, CPD has not sent any further correspondence regarding the ACLU's Request, and CPD has not released the Requested Records.

30. Upon information and belief, CPD delayed and ultimately failed to release the Requested Records in an attempt to avoid legitimate public oversight of CPD's use of social media monitoring software, not because additional time has been required to process the ACLU's Request.

COUNT I
WILLFUL VIOLATION OF THE ACLU'S FOIA REQUEST

31. The above paragraphs are incorporated by reference.

32. Defendants are public bodies under FOIA.

33. The Requested Records are public records of Defendants.

34. Defendants violated FOIA by failing to release the Requested Records.

35. Defendants have willfully and intentionally violated FOIA by refusing to release the Requested Records.

PRAYER FOR RELIEF

WHEREFORE, the ACLU respectfully asks the Court for the following relief:

- A. Declare that Defendants have violated FOIA;
- B. Order Defendants to release the Requested Records redacting only the material that is exempt;
- C. Enjoin Defendants from withholding non-exempt public records under FOIA;
- D. Order Defendants to pay civil penalties;
- E. Award the ACLU reasonable attorneys' fees and costs; and
- F. Award such other relief the Court deems just and proper.

DATED: June 20, 2018

Respectfully submitted,

/s/ Steven V. Hunter

Attorneys for Plaintiff

Karen Sheley
Rachel Murphy
ROGER BALDWIN FOUNDATION OF ACLU, INC.
150 N. Michigan Ave., Suite 600
Chicago, IL 60601
Tel: 312-201-9740
Fax: 312-201-9760
ksheley@aclu-il.org
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Steven V. Hunter
Louis A. Klapp
QUARLES & BRADY LLP
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Chicago, IL 60654
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Fax: 312-632-1948
steven.hunter@quarles.com
louis.klapp@quarles.com

EXHIBIT A

FIRST AMENDMENT WORKSHEET

Chicago Police Department

To: **Superintendent of Police**
Attention: General Counsel

Date and Time of Request	
20 Jan 17	1/20/17
First Amendment Invest. Tracking No.	
116-2017-001	

From: **District Commander/ Unit Commanding Officer of Exempt Rank:** Leo Panepinto

Name and star number

☒ Initial Authorization to Conduct

☐ Authorization to Continue

☐ Order to Terminate/Disapproval Of

a First Amendment investigation
relating to:

☒ Intelligence Gathering

☒ Public Gathering

Investigation Initiated: (Date) 1/20/17 (Time) 1000 Date Authorization Expires: 1/21/17

FACTUAL BASIS FOR INVESTIGATION - For authorization to initiate or continue an investigation, indicate how the investigation will serve/ continue to serve a proper law enforcement purpose and source of information relied upon to justify the investigation; for termination of an investigation or disapproval of an initiation request, indicate rationale for that determination: In an attempt to maintain public safety, we reviewed open source social media concerning mass gatherings. This is done to determine crowd size and locations for manpower analysis in order to ensure pedestrian and vehicular well being. During these reviews, sworn police officers assigned to the Deployment Operations Center as analysts found postings on open forums talking about "Black Bloc" participation in the protests. Members of a "Black Bloc" participation group are usually noted as a group of individuals that wear clothing or items that hide their identity. Being a member of a "Black Bloc" group or participating does not constitute a crime. However, historically many of these groups have promoted acts of civil disobedience and/or property damage during otherwise peaceful gatherings. The postings described "medic" training and participation and for people to carry kits to treat non-lethal police actions known to be employed when crowds turn unruly. The postings additionally called for acts of civil disobedience that can be anything from laying down in traffic, to breaking windows, or acts leading to injuring members of the public.

☒ See Attached Continuation Sheet

Indicate Investigative Techniques and Minimization Procedures to be used:

The following investigative techniques will be used during this investigation: monitoring publicly available information on the internet. Minimization procedures include limiting this investigation to a time period that is even shorter than the 30 day limit authorized for such investigations. This is an event specific investigation so as to have the least impact on First Amendment Rights.

☐ See Attached Continuation Sheet

☐ Request authorization to use Level II Investigative Techniques (electronic surveillance, undercover methods) based on the following justification:

☐ See Attached Continuation Sheet

PERSONS OR GROUPS TO BE INVESTIGATED

Name	Address	Affiliation, if Any	I.R. No.
TrumpTower-Chicago-Inauguration	Protest and Planning Page		
Disrupt J20			
Chicago Anarchist Black Cross			

Signature of District Commander/Unit Commanding Officer
of Exempt Rank

Signature of General Counsel

Date

General Counsel's Determination:

Concur ☒

Do Not Concur ☐

OFFICE OF THE FIRST DEPUTY SUPERINTENDENT
Deployment Operations Center

20 JANUARY 2017

TO: Eddie T. Johnson
Superintendent of Police

Attention: Charise Valente
General Counsel to the Superintendent

FROM: Leo Panepinto
Commander
Deployment Operations Center

SUBJECT: First Amendment Investigation

In an attempt to maintain public safety, we reviewed open source social media concerning mass gatherings. This is done to determine crowd size and locations for manpower analysis in order to ensure pedestrian and vehicular well-being. During these reviews, sworn police officers assigned to the Deployment Operations Center as analysts found postings on open forums talking about "Black Bloc" participation in the protests. Members of a "Black Bloc" participation group are usually noted as a group of individuals that wear clothing or items that hide their identity. Being a member of a "Black Bloc" group or participating does not constitute a crime. However, historically many of these groups have promoted acts of civil disobedience and/or property damage during otherwise peaceful gatherings. The postings described "medic" training and participation and for people to carry kits to treat non-lethal police actions known to be employed when crowds turn unruly. The postings additionally called for acts of civil disobedience that can be anything from laying down in traffic, to breaking windows, or acts leading to injuring members of the public.

An additional post was found that stated "Good place for a bomb downstairs Wacker. In one of those homeless person's tents." This threat can be interpreted in many ways to include a threat towards any protestors that may be attending the public gathering.

The purpose of this investigation is to acquire information to ensure adequate resources are available to maintain peace at the event and to allow for lawful demonstrations to take place and to investigate the threat and possible criminal acts that are associated with these postings, analysts will review the main sites that call for gatherings and then drill down on individuals that are associated with the threats. Due to the strong underlying 1st Amendment protected themes from these postings, to ensure the correct level of oversight, and to ensure the proper handling and protection of any evidence or personal privacy information once this investigation is completed, the undersigned recommends and requests the initiation of the 1st Amendment Investigation under number 116-2017-001.

OFFICE OF THE FIRST DEPUTY SUPERINTENDENT
Deployment Operations Center


20 JANUARY 2017

Page 2 of 2


SUBJECT: First Amendment Investigation

Signature Page Only

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2018-CH-07758
PAGE 4 of 6


Leo Panepinto
Commander
Deployment Operations Center


Steven Caluris
Deputy Chief
Deployment Operations


Kevin B. Navarro
First Deputy Superintendent

FIRST AMENMENT WORKSHEET CONTINUATION

An additional post was found that stated "Good place for a bomb downstairs Wacker. In one of those homeless person's tents." This threat can be interpreted in many ways to include a threat towards any protestors that may be attending the public gathering.

The purpose of this investigation is to acquire information to ensure adequate resources are available to maintain peace at the event and to allow for lawful demonstrations to take place and to investigate the threat and possible criminal acts that are associated with these postings, analysts will review the main sites that call for gatherings and then drill down on individuals that are associated with the threats. Due to the strong underlying 1st Amendment protected themes from these postings, to ensure the correct level of oversight, and to ensure the proper handling and protection of any evidence or personal privacy information once this investigation is completed, the undersigned recommends and requests the initiation of the 1st Amendment Investigation under number 116-2017-001

FIRST AMENDMENT WORKSHEET

Chicago Police Department

To: **Superintendent of Police**
Attention: General Counsel

Date and Time of Request	
21 January 2017	0001
First Amendment Invest. Tracking No.	
116-2017-001	

From: **District Commander/ Unit Commanding Officer of Exempt Rank:** Leo Panepinto

Name and star number

☐ Initial Authorization to Conduct

☐ Authorization to Continue

☒ Order to Terminate/Disapproval Of

} a First Amendment investigation
relating to:

☒ Intelligence Gathering

☒ Public Gathering

Investigation Initiated: (Date) 1/20/17 (Time) 1000 Date Authorization Expires: _____

FACTUAL BASIS FOR INVESTIGATION

- For authorization to initiate or continue an investigation, indicate how the investigation will serve/ continue to serve a proper law enforcement purpose and source of information relied upon to justify the investigation; for termination of an investigation or disapproval of an initiation request, indicate rationale for that determination: This investigation was conducted for one day beginning on 20 January 2017 @ 1000 hrs and ending on 21 January 2017 @ 0001 hrs. During this period, open source social media was monitored. In social media, there were discussions of disobedience, tactics and preparation to counter police non lethal actions known to be employed when crowds turn unruly and posts that stated "Good place for a bomb downstairs Wacker. In one of those homeless person's tents." As a result, there was a window broken at 307 N. Michigan, traffic disruption on Lake Shore Drive and fireworks and flares being thrown into garbage cans at Madison and Michigan. These actions led to 16 arrests.

☐ See Attached Continuation Sheet

Indicate Investigative Techniques and Minimization Procedures to be used:

☐ See Attached Continuation Sheet

☐ Request authorization to use Level II Investigative Techniques (electronic surveillance, undercover methods) based on the following justification:

☐ See Attached Continuation Sheet

PERSONS OR GROUPS TO BE INVESTIGATED

Name	Address	Affiliation, if Any	I.R. No.

Signature of District Commander/Unit Commanding Officer of Exempt Rank

Signature of General Counsel

Date

General Counsel's Determination:

Concur

Do Not Concur

☒

EXHIBIT B



300 N. LaSalle Street
Suite 4000
Chicago, Illinois 60654-3406
312.715.5000
Fax 312.715.5155
www.quarles.com

Attorneys at Law in
Chicago
Indianapolis
Madison
Milwaukee
Naples
Phoenix
Scottsdale
Tampa
Tucson
Washington, D.C.

Louis A. Klapp
Writer's Direct Dial: 312.715.2712
E-Mail: Louis.Klapp@quarles.com

January 2, 2018

VIA E-MAIL AND UPS OVERNIGHT

Freedom of Information Officer
Chicago Police Department
Records Division (Unit 163)
3510 South Michigan Avenue
Chicago, Illinois 60653
foia@chicagopolice.org

RE: Invoices, contracts, policies, manuals, and reports related to social media monitoring software

Freedom of Information Officer:

I represent the American Civil Liberties Union of Illinois ("ACLU of Illinois"). Pursuant to Freedom of Information Act, 5 ILCS 140/1 *et seq.*, the ACLU of Illinois seeks the records listed below.

Definitions

As used in this request, the term "**records**" includes but is not limited to any paper or electronic information, reports, evaluations, memoranda, correspondence, letters, emails, charts, graphs, flyers, meeting agendas, meeting minutes, training materials, diagrams, forms, DVDs, tapes, CDs, notes, or other similar materials.

As used in this request, "**social media service**" means an internet-based service that facilitates the sharing of user-generated content. "Social media service" includes without limitation Facebook, Instagram, Twitter, Google Plus, LinkedIn, Pinterest, YikYak, Reddit, SnapChat, MySpace, Tumblr, and YouTube.

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2018-CH-07758
PAGE 2 of 4

As used in this request, “**social media monitoring software**” means an application that enables the monitoring, searching, collection, or analysis of user-generated content located on social media services. “Social media monitoring software” includes without limitation the following:

- Dunami,
- PATHAR,
- LexisNexis Social Media Monitor,
- Dataminr,
- Geofeedia,
- NetBase,
- TransVoyant, and
- Tweet Deck.

“Social media monitoring software” includes without limitation applications made available through a software as a service model (i.e., where a provider hosts the application and makes it available to users over the internet). “Social media monitoring software” does not include a web browser when used to navigate directly to the webpage of a social media service.

Requests

The ACLU of Illinois requests the following records:

1. All contracts related to the purchase, acquisition, installation, maintenance, or use of social media monitoring software.
2. All invoices related to social media monitoring software.
3. All manuals, guides, training materials, or other instructional records related to social media monitoring software.
4. All policies governing access, use, or training related to social media monitoring software.
5. All directives governing access, use, or training related to social media monitoring software.
6. All Open Source receipts (or other reports of usage) related to the use of social media monitoring software by the CPD Crime Prevention and Information Center since October 2, 2017.

Chicago Police Department
January 2, 2018
Page 3

Logistics

Please email the requested records to me louis.klapp@quarles.com. If email is not feasible, please send them to me at the following address:

Louis A. Klapp
Quarles & Brady LLP
300 North LaSalle Street
Suite 4000
Chicago, Illinois 60654-3406

If possible, please provide the records in electronic format to prevent the need for copying fees. To the extent you incur fees associated with this request, please waive them pursuant to 5 ILCS 140/6(c) because this request is in the public interest. I represent to you that the documents are sought to determine information concerning the legal rights of the general public, and this request is not for the purpose of personal or commercial benefit. If you deny the request for waiver, we are prepared to pay reasonable copying costs for reproducing the requested records. Please notify me before compiling records for which the copying charge will exceed \$100.

Please contact me at 312-715-2712 or louis.klapp@quarles.com if you have any questions concerning this record request. Thank you.

Sincerely,



Louis A. Klapp

EXHIBIT C

From: FOIA
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Request re Social Media Monitoring Software [QBLLP-ACTIVE.FID39352690]
Date: Wednesday, January 3, 2018 8:39:12 AM
Attachments: [125thEmailSignatureLogo_e94f0299-ba87-488e-8ece-4038ae778254.jpg](#)

Hello:

The Chicago Police Department received your Freedom of Information Act Request on January 2, 2018. Under the Freedom of Information Act, a public body may extend the time to respond to a FOIA request by up to 5 business days for a limited number of reasons. Pursuant to Section 5 ILCS 140/3(e) of the Act, the CPD is extending the time to respond to your request by 5 business days from the original due date for the following reason(s):

- (x) The requested records are stored in whole or in part at other locations other than the office having charge of the requested records;
- (x) The requested records may require the collection of a substantial number of specified records;
- () The request is couched in categorical terms and requires an extensive search for the records responsive to it;
- (x) The requested records have not been located in the course of routine search and additional efforts are being made to locate them;
- (x) The requested records require examination and evaluation by personnel having the necessary competence and discretion to determine if they are exempt from disclosure or should be revealed only with appropriate deletions;
- (x) The request for records cannot be complied by the public body within the time limits prescribed by the Freedom of Information Act, 5 ILCS 140/3(c), without unduly burdening or interfering with the operations of the public body;
- (x) There is a need for consultation, which shall be conducted with all practicable speed, with another public body or among two or more components of any public body having a substantial interest in the determination or in the subject matter of the request.

You will get a reply on or before January 17, 2018

Chicago Police Department

FOIA Section

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering that message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this document is strictly prohibited.

From: Klapp, Louis A. [Louis.Klapp@quarles.com]
Sent: Tuesday, January 02, 2018 4:29 PM
To: FOIA
Subject: FOIA Request re Social Media Monitoring Software [QBLLP-ACTIVE.FID39352690]

Freedom of Information Officer:

Please see the attached correspondence, which requests information pursuant to the Freedom of Information Act. I am also sending a duplicate copy via UPS. Please contact me with any questions.

Thank you.

Louis Klapp



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn BIO vCard](#)
300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406
Office 312-715-2712 / Cell 312-288-5657 / quarles.com
Fax 312-632-1948
Assistant Sara Sullivan 312-715-5033

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PAGE 3 of 3

EXHIBIT D

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Cc: [O'Brien, Daniel M.](#)
Subject: FOIA Requests P434230, P437616
Date: Wednesday, January 17, 2018 2:49:29 PM

Dear Mr. Klapp,

Please be advised that your two FOIA requests are in process, and that we have reached out to various divisions inquiring as to responsive records. I will provide a response or update to you on or before January 24, 2018.

Thank you,

Audrey Shulruff, FOIA Officer

Chicago Police Department

Office of Legal Affairs, Unit 114

3510 S. Michigan Ave.

Chicago, IL 60653

312-745-5308

EXHIBIT E

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Wednesday, January 24, 2018 2:15:19 PM
Attachments: [image001.jpg](#)

Dear Mr. Klapp,

We are awaiting a response from Office of the First Deputy Superintendent of Police - Crime Prevention & Information Center (CPIC) regarding records for your request. I will provide a response or update to you on or before January 31, 2018.

Thank you,

Audrey

From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Wednesday, January 17, 2018 2:51 PM
To: Shulruff, Audrey G.
Cc: O'Brien, Daniel M.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Thank you.



Louis Klapp / Attorney
Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)
Quarles & Brady LLP
300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406
[Office](#) 312-715-2712 / [Cell](#) 312-288-5657 / quarles.com
[Fax](#) 312-632-1948
[Assistant](#) Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [mailto:Audrey.Shulruff@chicagopolice.org]
Sent: Wednesday, January 17, 2018 2:49 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>
Subject: FOIA Requests P434230, P437616

Dear Mr. Klapp,

Please be advised that your two FOIA requests are in process, and that we have reached out to various divisions inquiring as to responsive records. I will provide a response or update to you on or before January 24, 2018.

Thank you,

Audrey Shulruff, FOIA Officer

Chicago Police Department

Office of Legal Affairs, Unit 114

3510 S. Michigan Ave.

Chicago, IL 60653

312-745-5308

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PAGE 3 of 3

EXHIBIT F

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Wednesday, January 31, 2018 4:15:45 PM
Attachments: [image001.jpg](#)

Dear Mr. Klapp,

Your request is currently in process. I will provide a response or update to you on or before February 7, 2018.

Thank you,

Audrey

From: Shulruff, Audrey G.
Sent: Wednesday, January 24, 2018 2:15 PM
To: 'Klapp, Louis A.'
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

We are awaiting a response from Office of the First Deputy Superintendent of Police - Crime Prevention & Information Center (CPIC) regarding records for your request. I will provide a response or update to you on or before January 31, 2018.

Thank you,

Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Wednesday, January 17, 2018 2:51 PM
To: Shulruff, Audrey G.
Cc: O'Brien, Daniel M.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Thank you.



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)

Quarles & Brady LLP

300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406

Office 312-715-2712 / Cell 312-288-5657 / quarles.com

Fax 312-632-1948

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Wednesday, January 17, 2018 2:49 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>
Subject: FOIA Requests P434230, P437616

Dear Mr. Klapp,

Please be advised that your two FOIA requests are in process, and that we have reached out to various divisions inquiring as to responsive records. I will provide a response or update to you on or

before January 24, 2018.

Thank you,

Audrey Shulruff, FOIA Officer

Chicago Police Department

Office of Legal Affairs, Unit 114

3510 S. Michigan Ave.

Chicago, IL 60653

312-745-5308

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2018-CH-07758
PAGE 3 of 3

EXHIBIT G

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Wednesday, February 7, 2018 4:58:49 PM
Attachments: [image001.jpg](#)

Dear Mr. Klapp,

Your request is currently in process. I will provide a response or update to you on or before February 7, 2018.

Thank you,
Audrey

From: Shulruff, Audrey G.
Sent: Wednesday, January 24, 2018 2:15 PM
To: 'Klapp, Louis A.'
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

We are awaiting a response from Office of the First Deputy Superintendent of Police - Crime Prevention & Information Center (CPIC) regarding records for your request. I will provide a response or update to you on or before January 31, 2018.

Thank you,
Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Wednesday, January 17, 2018 2:51 PM
To: Shulruff, Audrey G.
Cc: O'Brien, Daniel M.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Thank you.



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)

Quarles & Brady LLP

300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406

Office 312-715-2712 / Cell 312-288-5657 / quarles.com

Fax 312-632-1948

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Wednesday, January 17, 2018 2:49 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>
Subject: FOIA Requests P434230, P437616

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2018-CH-07758
PAGE 3 of 3

EXHIBIT H

From: [Klapp, Louis A. \(CHI x6712\)](#)
To: ["Shulruff, Audrey G."](#)
Bcc: ["Q B Firm Pro Bono American Civil Libe 090022 03430 01 E Mail 090022 03430 "](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Tuesday, February 13, 2018 10:07:33 AM
Attachments: [image001.jpg](#)
[125EvergreenEmailSignature_a6b3add9-9dae-435d-970f-4c0911565efe.jpg](#)

Audrey,

Good morning. FOIA Requests P434230 (including its predecessor request P432117) and P437616 have been pending since October 17, 2017, and January 2, 2018, respectively. We do not accept the indefinite delay asserted in your weekly emails.

If CPD does not produce the requested documents by Wednesday, February 14, 2018, please provide a date certain by which it will do so. Otherwise we will likely need to pursue our legal options to compel CPD's compliance with the Freedom of Information Act. If you think a phone call will help resolve this, I am available to discuss.

Thank you.

Louis

From: Shulruff, Audrey G. [mailto:Audrey.Shulruff@chicagopolice.org]
Sent: Wednesday, February 7, 2018 4:59 PM
To: Klapp, Louis A. (CHI x6712)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

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Thank you,

Audrey

From: Shulruff, Audrey G.
Sent: Wednesday, January 24, 2018 2:15 PM
To: 'Klapp, Louis A.'
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Wednesday, January 17, 2018 2:51 PM
To: Shulruff, Audrey G.
Cc: O'Brien, Daniel M.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Thank you.



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn BIO vCard](#)

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Office 312-715-2712 / Cell 312-288-5657 / quarles.com

Fax 312-632-1948

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]

Sent: Wednesday, January 17, 2018 2:49 PM

To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>

Subject: FOIA Requests P434230, P437616

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EXHIBIT I

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Thursday, February 15, 2018 4:20:55 PM
Attachments: [image001.jpg](#)

Hello Mr. Klapp,
We have identified and been reviewing and processing documents responsive to your request and I hope to have them for you in the next few business days.
Thank you for your patience,
Audrey

From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Tuesday, February 13, 2018 10:08 AM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Audrey,

Good morning. FOIA Requests P434230 (including its predecessor request P432117) and P437616 have been pending since October 17, 2017, and January 2, 2018, respectively. We do not accept the indefinite delay asserted in your weekly emails.

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Thank you.
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From: Shulruff, Audrey G. [mailto:Audrey.Shulruff@chicagopolice.org]
Sent: Wednesday, February 7, 2018 4:59 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Audrey

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Sent: Wednesday, January 24, 2018 2:15 PM
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Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Audrey

From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Wednesday, January 17, 2018 2:51 PM

To: Shulruff, Audrey G.

Cc: O'Brien, Daniel M.

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Thank you.



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)

Quarles & Brady LLP

300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406

Office 312-715-2712 / **Cell** 312-288-5657 / quarles.com

Fax 312-632-1948

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]

Sent: Wednesday, January 17, 2018 2:49 PM

To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>

Subject: FOIA Requests P434230, P437616

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Thank you,

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Chicago Police Department

Office of Legal Affairs, Unit 114

3510 S. Michigan Ave.

Chicago, IL 60653

312-745-5308

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EXHIBIT J

From: Klapp, Louis A.
To: ["Shulruff, Audrey G."](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Monday, March 12, 2018 5:15:48 PM
Attachments: [image001.jpg](#)
[125EvergreenEmailSignature_a6b3add9-9dae-435d-970f-4c0911565efe.jpg](#)

Audrey,

Are you available for a call to discuss these requests? The following times work for me: Tuesday at 2 pm or 3 pm; Wednesday at 10 am or 11 am. If none of these times work for you, please let me know a better time. Thanks.

Louis

From: Shulruff, Audrey G. [mailto:Audrey.Shulruff@chicagopolice.org]
Sent: Thursday, February 15, 2018 4:19 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Hello Mr. Klapp,

We have identified and been reviewing and processing documents responsive to your request and I hope to have them for you in the next few business days.

Thank you for your patience,
Audrey

From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Tuesday, February 13, 2018 10:08 AM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Audrey,

Good morning. FOIA Requests P434230 (including its predecessor request P432117) and P437616 have been pending since October 17, 2017, and January 2, 2018, respectively. We do not accept the indefinite delay asserted in your weekly emails.

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Thank you.

Louis

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Wednesday, February 7, 2018 4:59 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Audrey

From: Shulruff, Audrey G.
Sent: Wednesday, January 24, 2018 2:15 PM
To: 'Klapp, Louis A.'
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

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Thank you,
Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Wednesday, January 17, 2018 2:51 PM
To: Shulruff, Audrey G.
Cc: O'Brien, Daniel M.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Thank you.



Louis Klapp / Attorney
Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)
Quarles & Brady LLP
300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406
[Office 312-715-2712](tel:312-715-2712) / [Cell 312-288-5657](tel:312-288-5657) / quarles.com
[Fax 312-632-1948](tel:312-632-1948)

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]

Sent: Wednesday, January 17, 2018 2:49 PM

To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>

Subject: FOIA Requests P434230, P437616

Dear Mr. Klapp,

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Thank you,

Audrey Shulruff, FOIA Officer
Chicago Police Department
Office of Legal Affairs, Unit 114
3510 S. Michigan Ave.
Chicago, IL 60653
312-745-5308

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EXHIBIT K

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Tuesday, March 13, 2018 9:18:35 AM
Attachments: [image001.jpg](#)

Good Morning Mr. Klapp,

We are currently reviewing and following up with several units to make sure we aren't missing anything. Can we speak at the end of the week if you have not heard from me before then?

Thanks so much,

Audrey

From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Monday, March 12, 2018 5:11 PM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Audrey,

Are you available for a call to discuss these requests? The following times work for me: Tuesday at 2 pm or 3 pm; Wednesday at 10 am or 11 am. If none of these times work for you, please let me know a better time. Thanks.

Louis

From: Shulruff, Audrey G. [mailto:Audrey.Shulruff@chicagopolice.org]
Sent: Thursday, February 15, 2018 4:19 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Hello Mr. Klapp,

We have identified and been reviewing and processing documents responsive to your request and I hope to have them for you in the next few business days.

Thank you for your patience,

Audrey

From: Klapp, Louis A. [mailto:Louis.Klapp@quarles.com]
Sent: Tuesday, February 13, 2018 10:08 AM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Audrey,

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Thank you.

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From: Shulruff, Audrey G. [mailto:Audrey.Shulruff@chicagopolice.org]
Sent: Wednesday, February 7, 2018 4:59 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Thank you,

Audrey

From: Shulruff, Audrey G.

Sent: Wednesday, January 24, 2018 2:15 PM

To: 'Klapp, Louis A.'

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

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Thank you,

Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]

Sent: Wednesday, January 17, 2018 2:51 PM

To: Shulruff, Audrey G.

Cc: O'Brien, Daniel M.

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Thank you.



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)

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Fax 312-632-1948

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]

Sent: Wednesday, January 17, 2018 2:49 PM

To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>

Subject: FOIA Requests P434230, P437616

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PAGE 4 of 4

EXHIBIT L

From: Klapp, Louis A.
To: ["Shulruff, Audrey G."](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Monday, March 19, 2018 11:24:20 AM
Attachments: [image001.jpg](#)
[125EvergreenEmailSignature_a6b3add9-9dae-435d-970f-4c0911565efe.jpg](#)

Are you free for a call at either 2 pm or 3 pm today to discuss the status of these requests? Thanks.

From: Klapp, Louis A. (CHI x6712)
Sent: Tuesday, March 13, 2018 10:24 AM
To: 'Shulruff, Audrey G.' <Audrey.Shulruff@chicagopolice.org>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Thank you for the update. I will follow up on Friday morning to schedule a Friday afternoon call (if necessary). Thanks.

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Tuesday, March 13, 2018 9:18 AM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Good Morning Mr. Klapp,

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Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Monday, March 12, 2018 5:11 PM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Louis

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Sent: Thursday, February 15, 2018 4:19 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
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Thank you for your patience,
Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Tuesday, February 13, 2018 10:08 AM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Sent: Wednesday, February 7, 2018 4:59 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Sent: Wednesday, January 24, 2018 2:15 PM
To: 'Klapp, Louis A.'
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

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Sent: Wednesday, January 17, 2018 2:51 PM
To: Shulruff, Audrey G.
Cc: O'Brien, Daniel M.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Thank you.



Louis Klapp / Attorney
Louis.Klapp@quarles.com / [LinkedIn BIO vCard](#)
Quarles & Brady LLP
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[Fax 312-632-1948](tel:312-632-1948)
[Assistant Sara Sullivan 312-715-5033](mailto:Sara.Sullivan@quarles.com)

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Wednesday, January 17, 2018 2:49 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>
Subject: FOIA Requests P434230, P437616

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Audrey Shulruff, FOIA Officer

Chicago Police Department
Office of Legal Affairs, Unit 114
3510 S. Michigan Ave.
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EXHIBIT M

From: Shulruff, Audrey G.
To: [Klapp, Louis A. \(CHI x6712\)](#)
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Date: Monday, March 19, 2018 11:29:13 AM
Attachments: [image001.jpg](#)

Good Morning,

Unfortunately, I am a bit under the weather and currently have no voice. Drinking a lot of tea though... I am sorry that I won't be able to discuss this today. I can let you know that we are still waiting to hear back from one more unit to see if they have any responsive records. As soon as we do, the rest will be ready to be approved for release.

Thank you,
Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Monday, March 19, 2018 11:24 AM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Are you free for a call at either 2 pm or 3 pm today to discuss the status of these requests? Thanks.

From: Klapp, Louis A. (CHI x6712)
Sent: Tuesday, March 13, 2018 10:24 AM
To: 'Shulruff, Audrey G.' <Audrey.Shulruff@chicagopolice.org>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]
Thank you for the update. I will follow up on Friday morning to schedule a Friday afternoon call (if necessary). Thanks.

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Tuesday, March 13, 2018 9:18 AM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Good Morning Mr. Klapp,
We are currently reviewing and following up with several units to make sure we aren't missing anything. Can we speak at the end of the week if you have not heard from me before then?
Thanks so much,
Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]
Sent: Monday, March 12, 2018 5:11 PM
To: Shulruff, Audrey G.
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Audrey,
Are you available for a call to discuss these requests? The following times work for me: Tuesday at 2 pm or 3 pm; Wednesday at 10 am or 11 am. If none of these times work for you, please let me know a better time. Thanks.
Louis

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]
Sent: Thursday, February 15, 2018 4:19 PM
To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>
Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Hello Mr. Klapp,

We have identified and been reviewing and processing documents responsive to your request and I hope to have them for you in the next few business days.

Thank you for your patience,

Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]

Sent: Tuesday, February 13, 2018 10:08 AM

To: Shulruff, Audrey G.

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Audrey,

Good morning. FOIA Requests P434230 (including its predecessor request P432117) and P437616 have been pending since October 17, 2017, and January 2, 2018, respectively. We do not accept the indefinite delay asserted in your weekly emails.

If CPD does not produce the requested documents by Wednesday, February 14, 2018, please provide a date certain by which it will do so. Otherwise we will likely need to pursue our legal options to compel CPD's compliance with the Freedom of Information Act. If you think a phone call will help resolve this, I am available to discuss.

Thank you.

Louis

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]

Sent: Wednesday, February 7, 2018 4:59 PM

To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

Your request is currently in process. I will provide a response or update to you on or before February 7, 2018.

Thank you,

Audrey

From: Shulruff, Audrey G.

Sent: Wednesday, January 24, 2018 2:15 PM

To: 'Klapp, Louis A.'

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Dear Mr. Klapp,

We are awaiting a response from Office of the First Deputy Superintendent of Police - Crime Prevention & Information Center (CPIC) regarding records for your request. I will provide a response or update to you on or before January 31, 2018.

Thank you,

Audrey

From: Klapp, Louis A. [<mailto:Louis.Klapp@quarles.com>]

Sent: Wednesday, January 17, 2018 2:51 PM

To: Shulruff, Audrey G.

Cc: O'Brien, Daniel M.

Subject: RE: FOIA Requests P434230, P437616 [QBLLP-ACTIVE.FID39352690]

Thank you.



Louis Klapp / Attorney

Louis.Klapp@quarles.com / [LinkedIn](#) [BIO](#) [vCard](#)

Quarles & Brady LLP

300 N. LaSalle Street, Suite 4000 / Chicago, IL 60654-3406

Office 312-715-2712 / Cell 312-288-5657 / quarles.com

Fax 312-632-1948

Assistant Sara Sullivan 312-715-5033

From: Shulruff, Audrey G. [<mailto:Audrey.Shulruff@chicagopolice.org>]

Sent: Wednesday, January 17, 2018 2:49 PM

To: Klapp, Louis A. (CHI x6712) <Louis.Klapp@quarles.com>

Cc: O'Brien, Daniel M. <Daniel.O'Brien@chicagopolice.org>

Subject: FOIA Requests P434230, P437616

Dear Mr. Klapp,

Please be advised that your two FOIA requests are in process, and that we have reached out to various divisions inquiring as to responsive records. I will provide a response or update to you on or before January 24, 2018.

Thank you,

Audrey Shulruff, FOIA Officer

Chicago Police Department

Office of Legal Affairs, Unit 114

3510 S. Michigan Ave.

Chicago, IL 60653

312-745-5308

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