

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

Jerry Boyle,)	
)	
Plaintiff,)	No. 17-cv-244
)	
v.)	Hon. Harry Leinenweber
)	
City of Chicago, et al.,)	
)	
Defendants.)	

DECLARATION OF SERGEANT JAMES J. FIDUCCIA

1. My name is James J. Fiduccia. I make this Declaration based on personal knowledge, and to the best of my recollection.
2. I have been employed by the Chicago Police Department (“CPD”) since 6 September 1994. My current rank is Sergeant. I am currently assigned to the Gang Investigation Division and directly supervise the Electronic and Technical Support Unit . I have served in this capacity since April 12th, 2015.
3. My job responsibilities include the general oversight of the system known as a “cell site simulator,” which includes both hardware and associated software. The CPD’s cell site simulator system is maintained exclusively within the Gang Investigation Division’s Electronic and Technical Support Unit.
4. As part of my job responsibilities, I communicate with representatives of the system’s manufacturer, the Harris Corporation, which is located in Melbourne, Florida. Since I began my current assignment, the CPD has only possessed one active and usable cell site simulator system, manufactured and maintained by Harris Corp. In essence, the cell site simulator consists of several pieces of hardware roughly comparable in size to

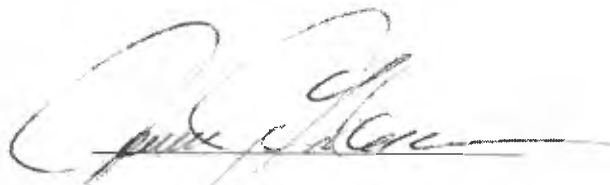


stereo components or computer drives, along with associated software. These hardware components can only function when they are installed in unison and as a complete system.

5. CPD also has outmoded Harris cell site simulator components in storage. It is my understanding that these components are out dated and have been out of use for quite some time. Presently, CPD has no other cell site simulator systems, usable or otherwise.
6. In June 2015, the essential components of CPD's StingRay system were returned by Harris Corp. in Florida, to which they had been sent for upgrades prior to my arrival in the Unit. It is my understanding that the CPD's StingRay system was in Harris Corp.'s possession for updates and maintenance beginning in late 2014.

I declare under penalty of perjury that the foregoing is, to the best of my recollection, true and correct.

Executed on April 24th, 2017

A handwritten signature in black ink, appearing to read "James Fiduccia", written over a horizontal line.

Sergeant James Fiduccia