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

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| STATE OF ILLINOIS,Plaintiff,v.CITY OF CHICAGO,Defendant. | Case No. 17-cv-6260Hon. Robert M. Dow Jr. |

**MEMORANDUM OF AGREEMENT BETWEEN THE CITY OF CHICAGO AND THE CONSENT DECREE COALITION REGARDING WORKING GROUPS**

1. Background: Pursuant to ¶ 709 of the Consent Decree in the above captioned matter, the Coalition is imbued with the authority to enforce the terms of the Decree. The Coalition is comprised of Plaintiff organizations in two separate lawsuits: (1) *Campbell v. City of Chicago*, Case No. 17-cv-4467 (N.D. Ill.); and (2) *Communities United v. City of Chicago*, Case No. 17-cv-7151 (N.D. Ill.). The Coalition’s purpose is to monitor, enforce, and educate the community about the Decree. A separate Memorandum of Agreement (MOA) between the Parties in the above captioned case (“Parties”) and the Coalition describes the Coalition’s role in monitoring compliance with the Decree. That MOA mandates, among other things, quarterly meetings with the Independent Monitor pursuant to ¶ 186 of the Consent Decree and provides the Coalition with the right to file written comments with the Court in response to the Monitor’s Reports.
2. **Purpose:** The Coalition and the City have agreed to initiate a Working Group process, to facilitate the drafting and implementation of CPD policy and practice, in accordance with the requirements of the Decree. Each Working Group will work cooperatively to create a final set of “Workgroup Recommendations,” based on, research, city records and data, policing best practices and model policies, and people’s lived experiences, to be transmitted to the Monitor for approval. Initial working groups should be developed to address 1) Impartial Policing; and

 2) Women and Gender & Prohibition of Sexual Violence. The Coalition and the City agree that once an agreed upon working group process developed, they will launch additional working groups on topics jointly identified by the Coalition and the City. Such topics may include, but are not limited to: 1) Police Interaction with Youth/Police in Schools; 2) Accountability, Transparency and the Civilian Office of Police Accountability; 3) Supervision and Officer Performance Evaluations; 4) Recruitment, Hiring and Promotion; 5) Training; 6) Officer Wellness and Support; 7) Crisis Intervention; 8) Response to Hate Crimes; and 9) Coordination and Implementation of the Empowering Communities for Public Safety Ordinance and the Consent Decree.

1. **Process**: In order to facilitate the Coalition’s role in the Working Group process, the Parties and the Coalition agree to the following:
	1. **Composition.** All Working Groups related to the consent decree will operate as a collaborative effort between the Parties and the Coalition. The City shall designate a chair who has relevant expertise and decision-making authority over the relevant policies at issue. Coalition members shall have the option to co-chair all Working Groups. In the event that the Coalition declines to co-chair a Working Group, the Coalition will work to identify community representatives to fulfill this role. The working group shall be comprised of individuals with the authority to approve policy for the CPD, Coalition representatives, subject matter experts, and people with lived experience relating to police abuse and misconduct. Workgroup chairs and co-chairs shall be responsible for 1) ensuring the composition of the work group is balanced and representative of Chicago’s diverse communities; 2) sharing information and guiding discussions about proposed policy; 3) ensuring that all Working Group members have access to the research and resources needed to fully participate; and 4) selecting Working Group members from the community to ensure the Group is representative of people, including youth, with lived experience, as defined in section 2b below; 5) collaborating with the City on a broader community outreach strategy to ensure that people most affected by the policy revision participate meaningful in this process.
	2. **Lived experience.** Each Working Group shall ensure that it is guided by the expertise of people who have experienced police abuse and misconduct. If this expertise is not reflected in the membership of a Working Group, the Group members must seek this expertise prior to issuing any recommendations.Final Working Group recommendations must be accompanied by a memorandum documenting how people’s lived experiences with police abuse and misconduct were incorporated into the final recommendations.
	3. **Access to City Records and Data.** A member of the CPD’s Research and Development unit will help to staff each working group. The City shall provide each Working Group with prompt access to all records, research, and data requested by members of the Group to enable the Working Group to fulfill its function.
	4. **Prior Coalition Recommendations.** Whenever applicable, the Parties shall provide Working Group members with the relevant recommendations developed by the Coalition and provided to the Parties prior to the Consent Decree’s implementation in Spring 2018. These recommendations include, but are not limited to, relevant excerpts of the “People’s Consent Decree” and excerpts of the *Campbell* Plaintiffs’ and *Communities United* Plaintiffs Submissions regarding the entry of the Consent Decree.
	5. **Costs and Administrative Support.** The City of Chicago will pay all costs associated with the Working Group operations, including, but not limited to, travel and food stipends for Working Group members, a Stipend for each Working Group Co-Chair, who is not an attorney or an employee of the City or State, and funding for subject area expert consulting fees, meeting space, administrative costs, office supplies and meeting-related food and beverages. Further, the city will designate staff resources sufficient to provide administrative support for each Working Group.
	6. **Time Frame.** Each Working Group shall adhere to the following timeframe, unless there is good cause for altering the schedule: 1) within 3 months of formation, the Group will issue initial recommendations; 2) within 6 months of formation, the Group issue final recommendations. If the Parties and/or the Coalition believe there is good cause for altering the schedule, they will so state in writing. The Parties and Coalition must agree to the altered schedule before it can be implemented.
	7. **Monthly Meetings.** On a monthly basis, the Working Group Chairs will meet with individuals leading the consent decree implementation efforts. These monthly meetings will include representatives with requisite knowledge from the City of Chicago, the Chicago Police Department, the Office of the Illinois Attorney General and the Coalition. The purpose of these meetings is to ensure that the working group process is proceeding as described in this MOA and to collectively redress any barriers to implementation.
	8. **Workgroup Recommendations.**  The Parties agree to submit all workgroup final recommendations to the independent monitor for approval. To the extent that any Party disagrees with the monitor’s decision, that Party may request that the monitor reconsider. If, after the monitor’s reconsideration, any party remains unsatisfied with the monitor’s decision, the Party may notify the court. The proposed policies and practices that result from the Working Group process that relate to the Consent Decree shall then be subject to the procedures outlined in paragraphs 626-637 of the Decree, Review of CPD Policies and Procedures.

By signing this MOA, each party represents it is fully authorized to enter into this MOA and accepts the terms, responsibilities, obligations and limitations of this MOA.

For the Office of the Illinois Attorney General: For the City of Chicago:

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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For *Campbell v. City of Chicago Plaintiffs*:

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[Name and Title]

[Address]

Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

For *Communities United v. City of Chicago* Plaintiffs:

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[Name and Title]

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Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_: