



October 26, 2018

Lisa T. Scruggs
Special Assistant Attorney General
Office of the Illinois Attorney General
100 West Randolph Street, Floor 12
Chicago, Illinois 60601

Allan T. Slagel
Special Assistant Corporation Counsel
City of Chicago
121 North LaSalle Street, Suite 600
Chicago, Illinois 60602

**SUBJECT: City of Chicago Police Department Independent Monitoring Proposal
– Supplemental Information**

Dear Ms. Scruggs and Mr. Slagel:

The Police Foundation respectfully submits this letter in response to the October 11, 2018 request for information regarding the next phase of the City of Chicago Police Department Independent Monitor selection process.

Unless as otherwise stated below, none of our team members have ever:

- Been terminated from employment or a consulting contract, or resigned from employment, a consulting contract, or a professional board or organization because of a report or allegation of misconduct;
- Been accused or adjudicated to have engaged in professional misconduct (for attorneys, only report sustained complaints to the Bar); or
- Been sued for professional or employment related actions and the case was settled, either by the member or an employer of the member, or adjudicated.

As former Chiefs of Police, Rick Braziel, Ronal Serpas, and Daniel Isom were sued in their official capacity as the policymaker for their departments (*Monell* claims), under *respondent superior* for actions of subordinates, and sometimes in their individual capacities. These cases were routinely settled in the court of City business and some were dismissed through litigation. Similarly, Jason Johnson was sued as a police officer for Prince George's County; the case was settled by the County.

Brian Maxey was sued as an Assistant Attorney General, but the case was dismissed *sua sponte* by the Court.

Ganesha Martin was sued in an employment capacity, but the matter was voluntarily withdrawn by the plaintiff prior to any responsive filings. As such, the matter was neither settled nor adjudicated, but we disclose in an abundance of caution.

None of our team members have ever had a finding of liability against them.

Please do not hesitate to contact us with any questions. Our contact information is:

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Thank you for your time and consideration.

Sincerely,



Blake Norton
Senior Vice President