

September 26, 2018

Ms. Katherine Lemire
Stone Turn Group, LLC
17 State Street
Suite 2610
New York, NY 10004
klemire@stoneturn.com

RE: Chicago Police Consent Decree Independent Monitor Selection Process
Request for Supplemental Information

Dear Ms. Lemire:

Thank you for responding to the Request for Proposals issued jointly by the Office of the Illinois Attorney General and the City of Chicago (collectively, “the Parties”) seeking individuals or firms interested in serving as the Independent Monitor. The Parties have had an opportunity to review your submission and would like to request supplemental information.

Please review the requests attached to this letter and provide your responses on or before the close of business October 10, 2018. Your written responses should be submitted in electronic format (PDF) and in hard copy. Please send the electronic responses to the OAG at LTScruggs@duanemorris.com and to the City at Aslagel@taftlaw.com. Please include “City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information” in the email subject line and on the package containing a hard copy of the proposal. Hard copies should be sent to the addresses below by USPS Priority Mail or overnight carrier (e.g., FedEx, UPS, DHL) to ensure timely delivery to the addresses below:

For the Attorney General for the State of
Illinois:

Lisa T. Scruggs
Special Assistant Attorney General
Duane Morris LLP
190 South LaSalle Street, Suite 3700
Chicago, IL 60603

For the City of Chicago:

Allan T. Slagel
Counsel for the City
Taft Stettinius & Hollister LLP
111 East Wacker Drive, Suite 2800
Chicago, IL 60601

The Parties have set the following dates for interviews and two public forums that finalists will be required to attend. Please plan accordingly. The interviews will take place on November 1 and 2, 2018 with the specific time and place to be determined later. The public forums are scheduled to take place on Saturday, November 3, 2018 at the James R. Thompson Center, 100 W. Randolph St., Chicago, IL.

We expect to provide additional information and more detailed schedules after October 15. In the meantime, if you have any questions, please direct them to the Parties via email to Lisa Scruggs and Alan Slagel.

Sincerely,

Lisa T. Scruggs
For the Office of the Attorney General
for the State of Illinois

Alan T. Slagel
For the City of Chicago

**City of Chicago Police Department Independent Monitoring RFP
Parties' Joint Request for Supplemental Information**

Please review the requests listed below and provide your responses on or before the close of business October 10, 2018. Your written responses should be submitted in electronic format (PDF) and in hard copy. To the extent that you believe any of the information requested was already provided as part of your initial response to the RFP, please so state and identify the page(s) where the information can be located.

1. Please provide a description of the roles and responsibilities for each member listed on your team. Please clearly define the roles and responsibilities and map them specifically to each task of monitor team members. Please be sure to tell us what the day-to-day responsibilities of each member of your leadership team will be. In your answer, you should, a) specify which of your team members will provide subject matter expertise regarding specified law enforcement functions and operations, engage in statistical or data analysis, participate in outreach to stakeholder communities, provide legal analysis, undertake project management responsibilities, or write reports and b) identify the projected amount of time or percentage of time each member will engage in each function.
2. Please describe how the size and composition of your team will allow for efficient operations. If you plan to modify the size or composition of your team, please describe your plan in more detail. If you expect to make any changes, identify the potential individual team member(s) involved and the role you expect the team member(s) to fulfill or activities they will handle and how the change will affect your overall monitoring plan. Also, to the extent changes in the team composition may affect your cost estimate, please so indicate and detail how the cost estimate would be modified.
3. Describe the distribution of work between the lawyers and the subject matter experts (SMEs) who will serve on your team, particularly between the division of responsibilities between the lawyers and the SMEs who have served in law enforcement.
4. The Parties have agreed to an annual budget cap of \$2.85 million. If your response to this request for supplemental information changes your cost estimate, or if your cost estimate exceeds the cap or you did not provide a complete cost estimate with your initial application, please provide an updated cost estimate. The updated estimate should include a description of how the applicant would fulfill the responsibilities of the Monitor within this cap and what adjustments, if any, you would make to ensure that all required work will be performed within this cap. There is no requirement to submit a revised cost estimate if your previously submitted cost estimate fell within the above-identified cap and no change is necessary.
5. Please include more detailed information to support your cost estimate, including: the total number of hours anticipated to monitor compliance with the consent decree during each of the first three years of the monitoring term, broken down by consent decree section, task (training assessment, policy review/development, technical assistance, community/police outreach), and monitoring team member(s).

6. In your cost estimate, you include projected hours that are contemplated for various activities. Please explain the basis and your rationale for each of those projections.
7. What commitment, if any, will your team make to ensure the performance of work that is necessary but that may fall outside the budget in any given year? In your response, please be sure to identify any team members who have indicated a willingness to provide work on a pro bono or non-billable basis.
8. The RFP contains a statement requesting that all communications with Parties be disclosed. To the extent you have had any communications, written or oral with either or both of the Parties or their consultants or experts before or after September 4, 2018 regarding the IM selection process or consent decree, please detail them. If your response to the RFP contained a statement regarding communications prior to September 4, 2018, there is no need to re-submit that information.
9. If any team members have government jobs and expect to retain those jobs during the term of the monitorship, please confirm that the team members' employment contracts or applicable employment policies permit outside work, and if required by their employer's policies or rules, that their employers are aware that they have applied to serve as the monitor or a member of the monitoring team in this matter.
10. If any team members intend to maintain a full-time job during the term of the monitorship in a position that does not contemplate work on a client-by-client basis (i.e., consultant or firm attorney), please describe how the team member intends to manage his or her full time employment obligation simultaneously with his or her monitorship responsibilities and confirm that their employers are aware (or will be made aware) that they have applied to serve as the monitor or a member of the monitoring team in this matter.
11. Many provisions in the proposed consent decree require the development and/or maintenance of technology systems capable of capturing and analyzing data. To meet the obligations of the consent decree, the City may need to implement significant changes to its automated data systems. The monitoring team will be responsible to assess the adequacy of the upgrades and may need to provide technical assistance. Please detail the experience your team has with the implementation of processes to collect and analyze data. In your response, identify the specific team member(s) who have that experience and how that experience might be used during the term of the monitorship.
12. What is your team's plan for gathering basic information about the Chicago Police Department and the status of its policing reform efforts at the outset of the monitorship?
13. Please provide more information on the team's proposed monitoring methodology. Specifically, describe the team's:
 - Approach to the development of a monitoring plan and staging of monitoring activities/priorities;
 - Establishment and measurement of compliance thresholds;
 - Engagement and collection of information from all stakeholder communities;

- Sources of information/data/access; and
- Capacity to provide ongoing technical assistance.

14. What is the nature of Dr. Long's experience with the Virgin Islands consent decree?

15. Please provide more detail and information on your plan to develop the Community Liaison role.

16. Please provide specific examples of technical assistance you've provided in the past.



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By Electronic Mail and Hand Delivery

October 10, 2018

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Allan T. Slagel
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Chicago, IL 60601

Dear Ms. Scruggs and Mr. Slagel:

This submission serves as a response to your Request for Supplemental Information dated September 26, 2018, in connection with StoneTurn's application to serve as the Independent Monitor for the Consent Decree regarding the Chicago Police Department ("CPD"). Your requests and our written responses are provided below.

1. Please provide a description of the roles and responsibilities for each member listed on your team. Please clearly define the roles and responsibilities and map them specifically to each task of monitor team members. Please be sure to tell us what the day-to-day responsibilities of each member of your leadership team will be. In your answer, you should, a) specify which of your team members will provide subject matter expertise regarding specified law enforcement functions and operations, engage in statistical or data analysis, participate in outreach to stakeholder communities, provide legal analysis, undertake project management responsibilities, or write reports and b) identify the projected amount of time or percentage of time each member will engage in each function.

- Much of the requested information is provided in our Proposal. Our Proposal provides details regarding the internal organization of the team (p. 9) and our Cost Proposal, included as Appendix B of the Proposal, provides additional detail regarding projected amount of time each member will engage in each function. We summarize this information below.
- I will serve as the named Monitor, and Monitorship Team members will report to me. With the support of the Monitorship Team and StoneTurn staff, I will develop a monitoring plan, oversee project management responsibilities, and be accountable for completion of the Monitorship Team's work. I will coordinate the work of the Monitorship Team, and will

serve as the primary liaison with the Court and the Parties. I will be primarily responsible for finalizing monitor reports to be filed periodically as required by the Consent Decree. I will also provide legal analysis as needed, and engage in policy and training reviews. I will also attend community meetings, and meet with stakeholders, including the Parties, members of the CPD, community leaders, and members' bargaining representatives.

- Dr. Long will review CPD policies, procedures, and training materials. He will also provide technical assistance and subject matter expertise, as needed, particularly in the areas of in-service and executive training, including a focus on use of force. He also could provide expertise in the following areas: community policing, crisis intervention, de-escalation techniques, propriety of stops and searches, interactions with youth and the mentally disabled, and community outreach. He will review whether subject matter experts are required to provide additional assistance. Working with other team members, he will conduct compliance reviews and audits to determine whether the City and CPD have complied with the requirements of the Consent Decree.
- Mr. Larrabee will also review CPD policies, procedures, and training materials. He will also provide technical assistance, as needed, in multiple areas, including community relations, community policing, executive training, and police-youth interactions. Working with other team members, he will conduct compliance reviews and audits to determine whether the City and CPD have complied with the requirements of the Consent Decree.
- Dr. Rasor-Cordero will also review CPD policies, procedures, and training materials. She is also experienced in providing technical assistance in numerous areas, including policy writing and numerous aspects of policing training. Working in conjunction with other team members, she will conduct compliance reviews and audits to determine whether the City and CPD have complied with the requirements of the Consent Decree. Dr. Rasor-Cordero will play a substantial role in assisting me in writing reports.
- In addition to the work detailed in our response to Question 11, below, Mr. Costa will oversee statistical analysis and data collection, including conducting community surveys. He will be assisted by StoneTurn staff in maintaining a public website for the posting of monitor reports and other public information. StoneTurn staff will also assist in logistics, collection and organization of documents, and report drafting.
- The Community Liaison will ensure regular meetings with community members and stakeholders. The Community Liaison will serve a vital role in ensuring that the City's diverse populations are included are heard, through participation in community meetings, and facilitating additional feedback through surveys. The Community Liaison will also ensure transparency, making certain that these populations have access to reports

drafted by the Monitorship Team.

- Mr. Burroughs will serve in a support role to me in my role as Monitor, providing assistance in the areas of training assessments, reporting writing, policy review, and overall project management. Mr. Burroughs will also work closely with the Community Liaison, serving as an additional representative of the Monitorship Team, demonstrating the Team's commitment to the community's input, through attendance at community meetings and meetings with other stakeholders.
- StoneTurn staff will be responsible for maintaining a public website for the posting of monitor reports and other public information. StoneTurn staff will also assist in logistics, collection and organization of documents, and report drafting.

2. Please describe how the size and composition of your team will allow for efficient operations. If you plan to modify the size or composition of your team, please describe your plan in more detail. If you expect to make any changes, identify the potential individual team member(s) involved and the role you expect the team member(s) to fulfill or activities they will handle and how the change will affect your overall monitoring plan. Also, to the extent changes in the team composition may affect your cost estimate, please so indicate and detail how the cost estimate would be modified.

- We expect that the size and composition of our team will allow for efficient operations which do not exceed cost expectations. First, the utilization of a small core team will promote communication and efficiencies among team members and with the various stakeholders. In addition, a small core team will allow for greater flexibility in responding to changing needs over the multi-year course of the monitorship. At the same time, the Monitorship Team will have access to the resources of a large consulting firm, StoneTurn, which could provide additional staffing at reduced rates if necessary to accomplish goals of the monitorship, including data collection, legal analysis, report writing, overall project management, and any other needs which have not been identified as this juncture.

3. Describe the distribution of work between the lawyers and the subject matter experts (SMEs) who will serve on your team, particularly between the division of responsibilities between the lawyers and the SMEs who have served in law enforcement.

- A unique aspect of our team is that each lawyer member of our team is also subject a matter expert. As a former local and federal prosecutor, and former Counsel to the Police Commissioner at the NYPD, I have experience writing policy and training in connection with the constitutionality of street-level interactions, and the arrests of transgender persons as well as their treatment while in police custody. I am also experienced in drafting training for

police officers and investigators interacting with survivors of sexual assault and domestic violence.

- As the former Commanding Officer of the NYPD Police Academy, Dr. Long, a law school graduate, is also a subject matter expert in policing. As detailed elsewhere in this submission and our Proposal, Dr. Long provided technical assistance in connection with monitorship of the NYPD, and has provided assistance to the U.S. Virgin Islands Police Department while the agency was operating under a federal consent decree. This work included drafting entry-level and in-service training lesson plans relating to the use of force training and additional support in the areas of promotions, executive training and development, officer morale, and supervision. He is also experienced in overseeing many of the topics addressed in the Consent Decree, including community policing, crisis intervention, de-escalation techniques, propriety of stops and searches, interactions with youth and the mentally disabled, and a variety of community outreach initiatives.

4. The Parties have agreed to an annual budget cap of \$2.85 million. If your response to this request for supplemental information changes your cost estimate, or if your cost estimate exceeds the cap or you did not provide a complete cost estimate with your initial application, please provide an updated cost estimate. The updated estimate should include a description of how the applicant would fulfill the responsibilities of the Monitor within this cap and what adjustments, if any, you would make to ensure that all required work will be performed within this cap. There is no requirement to submit a revised cost estimate if your previously submitted cost estimate fell within the above-identified cap and no change is necessary.

- Our previously submitted cost estimate fell within the above-identified cap and therefore no change is necessary.

5. Please include more detailed information to support your cost estimate, including: the total number of hours anticipated to monitor compliance with the consent decree during each of the first three years of the monitoring term, broken down by consent decree section, task (training assessment, policy review/development, technical assistance, community/police outreach), and monitoring team member(s).

- Appendix B of our Proposal provides all of this requested information.

6. In your cost estimate, you include projected hours that are contemplated for various activities. Please explain the basis and your rationale for each of those projections.

- These projections are based on a combination of factors, including a review of the Consent Decree, a review of Findings issued by the U.S. Department of Justice, an estimation of internal resources available within the Chicago Police Department to assist in the completion of the work required by the Consent Decree, the utilization of less costly resources available

through our team including StoneTurn, an anticipated steady decrease in hours in the course of monitorship, and our experience in budgeting other monitorship engagements.

7. What commitment, if any, will your team make to ensure the performance of work that is necessary but that may fall outside the budget in any given year? In your response, please be sure to identify any team members who have indicated a willingness to provide work on a pro bono or non-billable basis.

- Members of our team have indicated a willingness to provide work on a pro bono or non-billable basis to ensure the performance of work that is necessary but that may fall outside the budget in any given year. At the same time, please note that I am an experienced project manager, and am routinely required to adhere to budgetary requirements on monitorship engagements and other large projects.

8. The RFP contains a statement requesting that all communications with Parties be disclosed. To the extent you have had any communications, written or oral with either or both of the Parties or their consultants or experts before or after September 4, 2018 regarding the IM selection process or consent decree, please detail them. If your response to the RFP contained a statement regarding communications prior to September 4, 2018, there is no need to re-submit that information.

- No member of our team has had communications with either of the Parties or their consultants before or after September 4, 2018, except for an inquiry by Michael Bromwich with regard to contact information for a particular reference.

9. If any team members have government jobs and expect to retain those jobs during the term of the monitorship, please confirm that the team members' employment contracts or applicable employment policies permit outside work, and if required by their employer's policies or rules, that their employers are aware that they have applied to serve as the monitor or a member of the monitoring team in this matter.

- No member of the Monitorship Team presently holds a government job.

10. If any team members intend to maintain a full-time job during the term of the monitorship in a position that does not contemplate work on a client-by-client basis (i.e., consultant or firm attorney), please describe how the team member intends to manage his or her full time employment obligation simultaneously with his or her monitorship responsibilities and confirm that their employers are aware (or will be made aware) that they have applied to serve as the monitor or a member of the monitoring team in this matter.

- No member of our team intends to maintain a full-time job during the term of the monitorship in a position that does not contemplate work on a client-by-client basis.

11. Many provisions in the proposed consent decree require the development and/or maintenance of technology systems capable of capturing and analyzing data. To meet the obligations of the consent decree, the City may need to implement significant changes to its automated data systems. The monitoring team will be responsible to assess the adequacy of the upgrades and may need to provide technical assistance. Please detail the experience your team has with the implementation of processes to collect and analyze data. In your response, identify the specific team member(s) who have that experience and how that experience might be used during the term of the monitorship.

- As set forth on page 19 of our Proposal, Michael Costa, a Managing Director of Data Analytics in StoneTurn's Chicago offices, would lead the data collection and analysis efforts of the monitorship. Mr. Costa has substantial experience in automated data systems implementation, system data mapping, ongoing assessment of data quality and system maintenance, and analytics and reporting post-implementation. Mr. Costa, for example, assisted a higher education institution in its implementation of a state-of-the-art system tracking student information. This work required mapping data from 17 legacy information systems, and transitioning the data into a new schema to enable accurate reporting of historical student outcomes. He has additional experience in advising firms in system upgrades and provided technical assistance as needed.
- Additionally, Mr. Costa has assessed remediation strategies for technology infrastructure, information systems, and data management and storage systems in the course of a StoneTurn monitorship engagement. He is experienced in leveraging existing data systems to perform data analytics and reporting for investigations, litigation, and compliance services. In this role, he has led teams of data scientists and data analysts responsible for data upload, transformation, warehousing, and analytics, and is familiar with the utilization of state-of-the-art cloud-based platforms allowing for scalability and disaster recovery.
- As set forth on p. 20 of our Proposal, I served on the NYPD Police Commissioner's Information Technology Committee, which oversaw the implementation of key information technology initiatives, including the upgrade and merging of legacy systems. These initiatives included the centralization and increased accessibility of crime data for use by officers in the field. While I am not able to provide technical assistance in this area, I have a familiarity with the issues related to law enforcement information technology.

12. What is your team's plan for gathering basic information about the Chicago Police Department and the status of its policing reform efforts at the outset of the monitorship?

- Our starting point for gathering basic information about the Chicago Police Department, would be the Chicago Police Department. We note that the CPD has posted on its website proactive efforts to institute reforms, and we would seek to learn more of those efforts in order to eliminate redundant work in the course of the monitorship. At the same time, we would review the U.S. Department of Justice's Findings and also engage in conversations with the Illinois Attorney General's Office to learn more about the Office's perspectives on the CPD.

13. Please provide more information on the team's proposed monitoring methodology. Specifically, describe the team's: (a) approach to the development of a monitoring plan and staging of monitoring activities/priorities; (b) establishment and measurement of compliance thresholds; (c) engagement and collection of information from all stakeholder communities; (d) sources of information/data/access; and (e) capacity to provide ongoing technical assistance.

- (a) Approach to the development of a monitoring plan and staging of monitoring activities/priorities. As a threshold matter, we note that our approach to monitoring activities and priorities must remain fluid and able to adapt to the changing pace of reform over the course of the monitorship.

Monitoring plan: At the onset of the monitorship, we will develop a Monitoring Plan which will satisfy the mandates of the Consent Decree.

Assessment of the CPD: We will assess reforms already instituted by the CPD and evaluate whether the reforms satisfy any requirements of the Consent Decree. To gather information on the present state of the CPD, we will: interview stakeholders, including the Parties, CPD members and executives, representatives from other law enforcement agencies, community leaders; review data and reports relevant to the mandates of the Consent Decree; review civilian complaints and internal disciplinary cases as well as the underlying processes; assess policies and procedures relevant to the mandates of the Consent Decree; and assess the sufficiency and appropriateness of relevant recruit, in-service, and management training.

Community relations: Led by our Community Liaison, we will engage the community in multiple settings, including town hall meetings and meetings with community leaders, to ensure the transparency of our work. We will also employ other means of gathering data relevant to community relations, such as surveys conducted within

Chicago's diverse communities.

Gap analysis: Following our assessment of the CPD, we will engage in a gap analysis to evaluate areas in need of reform.

Drafting and implementation of revised policies, procedures, and training. After identifying gaps between the CPD's actual practices and the mandates of the Consent Decree, we will create a roadmap for fulfilling the requirements of the Consent Decree, including the need for revised policies, procedures and training. To the extent that the CPD is able to initiate these changes without our assistance, we will confine our role to reviewing and assessing those changes.

Assessing full compliance: Throughout the course of the monitorship, we will assess the CPD's progress, and track reforms as they are implemented.

- Establishment and measurement of compliance thresholds. As provided above, we will establish compliance thresholds through our initial monitoring plan, and will track the CPD's progress throughout the course of the monitorship.
- Engagement and collection of information from all stakeholder communities. We will engage stakeholder communities through town hall meetings; community surveys; and meetings with a variety of stakeholders, including the Parties, civilian and uniformed members of the CPD, CPD executives, other law enforcement agencies, and community leaders including but not limited to those from faith-based organizations, schools, and non-profit organizations.
- Sources of information/data/access. Sources of information utilized in the course of the monitorship will include CPD policies and procedures, training lesson plans, observation of training classes, police reports, disciplinary case files, crime data, civilian complaints, interviews of CPD members and executives, community surveys, interviews of community leaders and other stakeholders, and town hall meetings.
- Capacity to provide ongoing technical assistance. As detailed elsewhere in this response and in our Proposal, our core team includes several former law enforcement officers and a former prosecutor able to provide ongoing technical assistance. If additional resources are needed, we will seek to find appropriate personnel within the CPD, and if needed, we will onboard additional personnel to provide such assistance. Dr. Razor-Cordero and Dr. Long are associated with the Center for Public Safety Management, which provides technical assistance and

training for law enforcement agencies. If additional resources are required, we will be well-positioned to meet these needs.

14. What is the nature of Dr. Long's experience with the Virgin Islands consent decree?

- As provided on pages 14 of our Proposal, and in pages 1 and 3 of his attached C.V., Dr. Long was engaged by T&M Protection Resources to assist the Virgin Islands Police Department in the course of its work in gaining compliance with the consent decree. In that capacity, he developed entry-level and in-service training lesson plans relating to the use of force training. He provided additional support in the areas of promotions, executive training and development, officer morale, and supervision.

15. Please provide more detail and information on your plan to develop the Community Liaison role.

- As a threshold matter, our team believes the Community Liaison role to be of paramount importance. If our team is awarded the monitorship, finding a Community Liaison would be an immediate priority. The ideal candidate will possess the following qualifications: extensive knowledge of Chicago communities, ability to understand all aspects of the Monitorship, excellent communication skills, and availability to devote substantial time as needed to the work of the monitorship. This individual must also be someone who is perceived as unbiased by all stakeholders.

Our team made the deliberate decision in submitting our Proposal to utilize a placeholder for the Community Liaison role. In our experience, it would be a mistake to choose an individual for this role without canvassing the stakeholders for potential perceptions of bias or other perceived shortcomings. We would proceed by utilizing our relationships and resources within Chicago to find the right individual for this position.

16. Please provide specific examples of technical assistance you've provided in the past.

- Dr. Long, Dr. Rasor-Cordero, and Mr. Larrabee have each provided technical assistance to municipal police departments, in the form of policy drafting and assessments, and training. Moreover, as Counsel to the Police Commissioner at the NYPD, I have also provided technical assistance. Among the team members, they have provided a broad array of technical assistance to law enforcement agencies, including areas such as community policing, use of force, de-escalation techniques, police-youth interactions, crisis intervention, arrest of transgender individuals, constitutional policing and street-level interactions, and treatment of sexual assault and domestic violence victims.



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We look forward to the opportunity to discuss our qualifications with you. Thank you for considering our application in this matter.

Sincerely,



Katherine A. Lemire
Partner
StoneTurn

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October 11, 2018

VIA E-MAIL

Ms. Katherine Lemire, JD
StoneTurn Group, LLC
17 State Street
Suite 2610
New York, NY 10004

Re: Chicago Police Consent Decree Independent Monitor Selection Process

Dear Ms. Lemire:

Thank you for your submissions in response to the Request for Proposals issued jointly by the Office of the Illinois Attorney General and the City of Chicago and your ongoing interest in serving as the Independent Monitor. We would like to provide some additional information regarding the next phase of the process.

We will notify those teams who have advanced to the finalist stage during the week of October 15. Please be advised that all finalists will be required to submit an answer to the following question in writing on or before October 26.

Please advise if any team member has:

- *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*

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Ms. Katherine Lemire, JD
October 11, 2018
Page 2

- *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.*

Your written responses should be submitted in electronic format (PDF) and emailed to LTScruggs@duanemorris.com and to the City at Aslagel@taftlaw.com. Please include “City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information” in the email subject line. If you have any questions or concerns regarding your ability to provide a response, please contact Lisa and Allan before October 17 to schedule a mutually convenient time for discussion.

Sincerely,

Lisa T. Scruggs
For the Office of the Attorney General
For the State of Illinois

Allan T. Slagel
For the City of Chicago

LTS/saw



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By Electronic Mail and Hand Delivery

October 26, 2018

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Dear Ms. Scruggs and Mr. Slagel:

This submission serves as a response to your request to finalists dated October 11, 2018. In sum, you ask to be advised if any team member has:

1. 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 of allegation of misconduct.
 - No member of our team has 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 of allegation of misconduct.
2. Been accused or adjudicated to have engaged in professional misconduct (for attorneys, only report sustained Complaints to the Bar)
 - No member of our team has been accused or adjudicated to have engaged in professional misconduct.
3. 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.
 - In the course of serving as the chief of several police departments, Mr. Larrabee, typically along with other municipal officials, has been named in multiple lawsuits. To the best of his recollection, nearly all of these lawsuits were dismissed. He did recall that one case did

settle: Dominque Cash v. Town of East Haven, et al., 15 Civ. 0079, filed in U.S. District Court in Connecticut. Notably, when Mr. Larrabee was vetted by the U.S. Department of Justice ("DOJ") and the Federal Bureau of Investigation ("FBI") to head the East Haven (Connecticut) Police Department, DOJ and the FBI were aware of this prior litigation and nonetheless approved his appointment.

- In the course of serving as a high-ranking member of the NYPD, Dr. Long, has been named in at least one lawsuit, in the 1990s. He is unaware as to whether the case was settled or dismissed.

Please do not hesitate to contact us if you require additional information. We look forward to meeting you in Chicago.

Sincerely,



Katherine A. Lemire
Partner
StoneTurn



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By Electronic Mail

October 31, 2018

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Dear Ms. Scruggs and Mr. Slagel:

This submission serves as a response to your verbal feedback provided on October 22, 2018, in connection with StoneTurn's application ("Proposal") to serve as the Independent Monitor for the Consent Decree regarding the Chicago Police Department ("CPD"). You provided us with the opportunity to elaborate on the following aspects of our Proposal, and we do so below.

1. The comparatively smaller size of our team, and the ability of team to complete scope of work.

Our model for accomplishing the work necessitated by the Consent Decree is centered on a core team, with the ability to expand as required. Each annual budget submitted in our Proposal amounts to more than \$1 million below the \$2.85 million cap requested by the Parties, largely in part to allow for the use of additional assistance as needed. Moreover, as provided in our Proposal, our team includes not only those individuals named in the Proposal, but also the resources of StoneTurn.

We view our size as a significant asset. We are a highly-specialized group with sufficient expertise to ensure the mandates of the Consent Decree can be accomplished. A smaller core team offers the advantages of vastly improved communication, streamlined collaboration, and contained costs. In short, a core team modeled in this manner will accomplish the goals of the Consent Decree in the most efficient and effective manner.

2. Our ability to meet expectations in the following areas: law & civil rights, impartial policing, accountability, and crisis intervention.

Our team is qualified to meet expectations in these specified areas, as demonstrated by our experience and expertise detailed below.



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Law and Civil Rights: As a federal and local prosecutor, Ms. Lemire regularly assessed legal sufficiency and compliance with constitutional law, federal law, and local laws. Dr. Long, in the course of his career at the NYPD including as the Commanding Officer of the Police Academy, and his present work on the NYPD monitorship, has extensive knowledge and experience with regard to constitutional policing. Likewise, Mr. Larrabee is deeply knowledgeable with regard to law enforcement compliance with constitutional and other legal requirements. He served as the first Civil Rights Officer in the Framingham Police Department, and gained additional familiarity and expertise in constitutional policing through his direct experience in directing the overhaul of the East Haven Police Departments policies and practices to comply with a federal consent decree. Given her strong training background, Dr. Rasor-Cordero is well-acquainted with the legal requirements of constitutional policing. As a former federal law enforcement agent, Mr. Burroughs is well-versed in constitutional policing and federal laws governing law enforcement work. (Proposal, p. 15.)

Impartial policing: As provided in our Proposal, Dr. Long has a lengthy history of providing feedback, technical assistance, training, and guidance in the area of impartial policing. Mr. Larrabee and Dr. Rasor-Cordero likewise have experience with reviewing law enforcement practices for impartial policing.

Accountability: Throughout their careers, all team members have worked on projects and led reform focused on accountability, recognizing that lasting reform is only possible if accompanied by accountability. In the course of our work in the monitorship of the Carpenters Union, for example, Ms. Lemire and Mr. Burroughs evaluated processes for supervisors and managers to oversee accountability in this 20,000-member union. They led, for example, the assessment of the Union's Office of the Inspector General, and promoted reforms which significantly broadened the Office's accountability to the Union leadership and membership. In addition, during her time as Counsel to the Police Commissioner at the NYPD, Ms. Lemire oversaw a large-scale re-engineering project that, in part, focused on the evaluation, development, and implementation of processes for supervisors and managers to oversee accountability in the NYPD. Likewise, in instituting reform in multiple police departments, Mr. Larrabee directed organizational reforms which reflected the implementation of increased accountability among police managers and executives. Likewise, Dr. Long and Dr. Rasor-Cordero have worked throughout their careers to institute reform through increased accountability including, for example, through their work for the Center for Public Safety Management.

Crisis Intervention: As provided in our Proposal, Dr. Long, Dr. Rasor-Cordero and Mr. Larrabee have experience in reviewing law enforcement practices and providing feedback in connection with crisis intervention.

3. How we will ensure a cohesive strategy involving the community liaison and the core monitoring team.

Simply put, we view the Community Liaison as a member of the core monitoring team. Each core team member, including the Community Liaison, will participate in regularly-scheduled biweekly meetings and, later in the monitorship, monthly meetings to ensure coordination among the team members and, importantly, to ensure the Community Liaison has firsthand knowledge of the workings of other team members. Given the

critical role of the Community Liaison in creating transparency between the monitorship team and Chicago's diverse communities, the Community Liaison must be fully informed at all times of the work being completed by other team members. Likewise, the Community Liaison will serve in the crucial role of providing community feedback to the other monitorship team members, to help frame the latter's efforts and provide measures of success.

4. Whether Dr. Long and I had any involvement with development and implementation of stop & frisk policy.

Neither Dr. Long nor I had any involvement with the development implementation of stop and frisk policy. Moreover, as detailed in our Proposal, during my tenure as Counsel to the Police Commissioner at the NYPD, I reviewed, revised, and oversaw the implementation of policies and training governing the constitutionality of street-level interactions between police officers and civilians. In particular, I led an initiative to retrain thousands of officers responsible for patrolling public housing developments, focusing on the proper legal basis for stopping and questioning civilians.

We look forward to meeting you in Chicago.

Sincerely,



Katherine A. Lemire
Partner
StoneTurn