



- f. Employee numbers;
- g. Employment records;
- h. Dates of birth;
- i. Driver's license numbers;
- j. Home addresses; and
- k. Personal telephone numbers.

3. Confidential Information received by the attorneys of record shall be used only for purposes of the prosecution of or the defense of the charges in the above-captioned matter, including any subsequent administrative review of a Police Board decision in the above-captioned matter by the Circuit Court of Cook County and/or an appeal to the Illinois Appellate Court, Illinois Supreme Court, or any other court with jurisdiction over the review of this matter.

4. Confidential Information shall in no way be discussed with, disseminated, delivered, or otherwise disclosed to any person except:

- a. Attorneys of record herein and their duly authorized legal, paralegal, or stenographic employees and expert witnesses or consultants;
- b. Stenographic reports of testimony in this litigation and any hearing officer before whom this matter is heard, and his or her personnel;
- c. Videographers duly assigned by the Police Board to record this matter;
- d. With respect to Confidential Information produced by the City:
  - i. City employees who otherwise have authorized access to said Confidential Information;
  - ii. Each person who is the subject of Confidential Information shall have access to the information of which he or she is the subject; and
  - iii. In the case of medical records, the relevant health care provider and his or her duly authorized agents.
- e. Members and staff of the Police Board and any reviewing court; and
- f. Other persons as agreed by the parties or as required by law, or by any judicial, governmental, or administrative body under any law, regulation, or order.

5. To the extent that any Confidential Information, including medical records relating to Respondent, is protected under HIPAA, the signatories further agree to treat the Confidential Information with all protections due to PHI under HIPAA, the *Standards for Privacy of Individually Identifiable Health Information*, codified at 45 C.F.R. §§ 160 & 164 (2000) (“Privacy Standards”), and the *Standards for Privacy of Individually Identifiable Health Information*, codified at 45 C.F.R. §§ 160 & 164 (2007) (“Security Standards”), including:

- a. Not using or disclosing the Confidential Information released for this proceeding for any other purpose or in any other proceeding unrelated to the above-captioned Police Board matter;
- b. Storing all Confidential Information while it is in their possession according to the Privacy Standards and Security Standards; and
- c. Either returning all Confidential Information in any medium disclosed during the course of this proceeding to the Assistant Corporation Counsel representing the Superintendent and/or the attorney representing the person who disclosed the Confidential Information and documents; or disposing of the Confidential Information and documents in any medium disclosed during the course of this proceeding pursuant to the Privacy Standards and Security Standards.

6. If any party to this proceeding wishes to file as part of a motion, brief, or other pleading, or otherwise seeks to enter into the administrative record of this proceeding, any documents or information subject to this Order, the parties shall take all necessary steps to maintain such documents or information as confidential in a previously determined, mutually acceptable manner.

7. Nothing in this Order shall preclude any party from using said Confidential Information and documents in the above-captioned Police Board matter, and/or on administrative review of the same; and/or in any appeal to the Circuit Court of Cook County, Illinois Appellate Court, Illinois Supreme Court, or any other court with jurisdiction over the review of this matter.

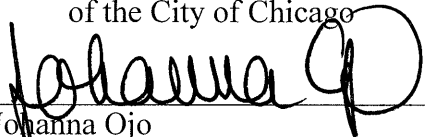
8. Nothing in this Order shall be deemed a waiver of any party’s right to object to any discovery request or to the admissibility of any evidence on the ground of relevance,

materiality, privilege, over breadth, or any other recognized objection to discovery or admissibility of evidence.

9. This Order shall be binding on the parties, their successors, representatives, agents, employees, and assigns, as well as the parties' counsel and those working under the direction of counsel.

MARK A. FLESSNER  
Corporation Counsel  
of the City of Chicago

By:




Johanna Ojo  
Assistant Corporation Counsel

Date:

8/1/19

SERGEANT KHALIL  
MUHAMMAD  
Respondent

By:



Donna Dowd  
Attorney for Respondent

Date:

8-1-2017

Entered:



Police Board of the City of  
Chicago

Date:

8/1/19