

THE POLICE BOARD OF THE CITY OF CHICAGO  
30 N. LaSalle, Suite 1220, Chicago, Illinois 60601

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IN THE MATTER OF THE )  
CHARGES AGAINST )  
Sergeant Khalil Muhammed ) Case #19 PB 2956  
Respondent )

**RESPONDENT’S MOTION FOR DISCOVERY**

Now comes Respondent, by and through the Policemen’s Benevolent and Protective Association, Labor Committee, and pursuant to the Rules of Procedure – Chicago Police Board, requests the following information from the Complainant:

- A copy of the complete complaint register file underlying the above referenced matter, #1086825, including investigator notes, comments, and working papers, such as drafts of the final report.
- Copies of any notes or other recordings taken by the Civilian Office of Police Accountability (“COPA”) investigators at interviews of Respondent related to the above captioned matter.
- Copies of all video and electronic recordings underlying the complaint in this matter.
- Copies of all witness statements to COPA and the notes taken by any and all COPA investigators, including draft witness statements.
- The Command Channel Review for Log #1086825, including any non-concurrences or concurrences whether in the narrative section of the electronic system or in a report uploaded to the electronic system.
- A complete copy of Respondent’s personnel file, including all prior disciplinary history and complimentary history.
- A complete copy of Respondent’s training record, including the format by which the training was received.
- Any email communications between COPA investigators/supervisors and members of the Chicago Police Department regarding the underlying complaint in this matter.
- Any email communications between members of the Chicago Police Department regarding the underlying complaint in this matter.

- All OEMC communications regarding the incident giving rise to these charges that occurred at or near 10947 South Hermosa on August 13, 2017: 911 calls, police radio transmissions, fire radio transmissions and portable data terminal (PDT) messages
- The names of all witnesses the City might call at the hearing whether in its case-in-chief or in (sur-)rebuttal, together with a summary of the subjects to which each might testify.
- Copies of all documents and other matter that the City might introduce as exhibits, or use for impeachment, demonstration, to refresh recollection, or for any other purpose.

Dated this 2<sup>nd</sup> day of July, 2019.



Donna M. Dowd  
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