

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

CHICAGO JUSTICE PROJECT,	)	
	)	
Plaintiff,	)	
	)	18 CH 06576
v.	)	
	)	Hon. Caroline K. Moreland
CHICAGO POLICE DEPARTMENT,	)	
	)	
Defendant.	)	

**PLAINTIFF’S FIRST SET OF DISCOVERY REQUESTS**

Plaintiff, CHICAGO JUSTICE PROJECT, by its undersigned attorneys, LOEVY & LOEVY, propounds the following discovery requests to Defendant, CHICAGO POLICE DEPARTMENT.

**Interrogatories**

1. Identify each person who participated or was consulted in answering these discovery requests.
2. Identify each person working in the Data Fulfillment and Analysis Section, Strategic Analytics Division of CPD and identify their positions and when they began working in the Data Fulfillment and Analysis Section, Strategic Analytics Division of CPD.
3. Identify the person in the Data Fulfillment and Analysis Section, Strategic Analytics Division of CPD who knows the most about how CPD stores and organizes its data.
4. Identify each person involved in or aware of the September 26, 2016 FOIA request, the January 20, 2017 FOIA request, the narrowed February 18, 2017 FOIA request, and the June 23, 2017 FOIA request in this case and what their role was, and specify which FOIA request they were involved in or aware of.

5. Identify how the search(es) for the September 26, 2016 requested records, January 20, 2017 requested records, the narrowed February 18, 2017 requested records, and the June 23, 2017 requested records were performed including what systems and/or databases were searched and why, what search terms and/or keywords were used and why, what information was relied on to conduct the search(es), and specify which FOIA request the identified search applies to.

6. Identify by name, date, and description any records originally deemed to be responsive to the search but after review were later deemed unresponsive to the September 26, 2016 FOIA request, the January 20, 2017 FOIA request, the narrowed February 18, 2017 FOIA request, and the June 23, 2017 FOIA request, and specify which request the records were originally deemed responsive to?

7. What record keeping system(s) is/are used to maintain the records created in the course of making hiring decisions?

8. For each record keeping system identified in interrogatory number 7, how can searches be conducted of that system?

9. In what physical format is staffing analysis maintained?

10. In 2016, were private email and other communication accounts or private devices used to conduct, discuss, and analyze CPD's staffing needs and the decision to hire about 1,000 new officers?

11. If the answer to number 10 is yes, identify all of the people who used private accounts or devices.

12. Describe the staffing analysis done prior to Superintendent Johnson's announcement on September 21, 2016 that CPD would be hiring about 1,000 new police officers.

13. Identify each record containing or referencing the analysis that were described in response to number 12.

14. For each record described in number 12 and identified in number 13, where is that record most likely to be found?

15. For each record described in number 12 and identified in number 13, identify who created and/or completed the record.

16. What record keeping system(s) is/are used to maintain the crime incident data?

17. What record keeping system(s) is/are used to maintain the data for the “GA\_CASE\_CATEGORY\_DESCR”, “BIAS\_MOTIVATION\_DESCR”, “Domestic” fields.

18. For each record keeping system identified in interrogatory numbers 16 and 17, how can searches be conducted of that system?

19. In what physical format is crime incident data maintained?

20. What record keeping system(s) is/are used to maintain the OEMC call for service data?

21. For each record keeping system identified in interrogatory number 20, how can searches be conducted of that system?

22. In what physical format is OEMC call for service data maintained?

23. Explain why the number of OEMC calls for service reported in CPD’s annual report differ than the amount of data produced through this lawsuit in response to the June 23, 2017 FOIA request (see Instruction G).

24. Were private email and other communication accounts or private devices used to discuss OEMC calls for service data?

25. If the answer to number 24 is yes, identify all of the people who used private accounts or devices.

### **Requests for Production**

1. All records upon which you intend to rely in this case.
2. All records related to the processing of the September 26, 2016, January 20, 2017, February 18, 2017, and June 23, 2017 FOIA requests at issue in this case or created in the course of processing the request as well as all records mentioning or referring to Plaintiff.
3. All records documenting the searches for the records responsive to the September 26, 2016, January 20, 2017, February 18, 2017, and June 23, 2017 FOIA requests at issue in this case.
4. All FOIA policies, procedures, orders, directives, training materials, or other records in effect at the time of the FOIA requests and subsequent searches in this case.

### **INSTRUCTIONS**

- A. "Record" shall be given the broadest definitions of public records, documents, objects, tangible things, and electronically stored information under either Sup. Ct. Rule 214 or FOIA Section 2(c). This includes but is not limited to paper records, electronic records, emails and attachments (which should be kept together), voice mail messages, phone logs, text messages, calendar entries, and electronic data processing or database records.
- B. Electronic records should be produced as PDFs, but all original metadata should be preserved for possible future requests for the metadata.
- C. To the extent you refuse to produce any records on the basis that they are irrelevant, this request should also be considered a FOIA request for the same, and such records may be produced at the same time as your document production instead of the FOIA deadline.
- D. You should produce all records in your custody or control. This includes, for example, records in the possession of any private entity with whom you have contracted to perform a governmental function (see FOIA Section 7(2)).
- E. Please produce a privilege log for all records withheld on that basis.

- F. In the course of your search for responsive records, please ensure that people with relevant knowledge identify all unofficial or unauthorized repositories of records and that those repositories are searched.
- G. The below table reflects the amount of OEMC calls for service reported by CPD in its annual report (“Annual Report #s”) and the amount of OEMC calls for service identified through the data already produced in this lawsuit in response to the June 23, 2017 FOIA request (“CPD Discovery #s”).

<b>Year</b>	<b>Annual Report #s</b>	<b>CPD Discovery #s</b>	<b>% CPD Provided</b>
1999	3,998,811	766,518	19%
2000	4,396,615	797,788	18%
2001	5,144,617	774,186	15%
2002	4,937,360	762,270	15%
2003	5,054,817	736,727	15%
2004	5,271,469	730,715	14%
2005	4,979,621	707,791	14%
2006	5,040,887	691,139	14%
2007	5,076,219	675,040	13%

<b>Year</b>	<b>Annual Report #s</b>	<b>CPD Discovery #s</b>	<b>Difference Total</b>	<b>% CPD Provided</b>
2008	4,704,590	5,468,089	-763,499	116%
2009	4,495,714	5,240,991	-745,277	117%
2010	3,711,913	5,012,285	-1,300,372	135%
2011	<b>3,690,176</b>	5,190,667	-1,500,491	141%
2012	<b>3,592,441</b>	5,337,453	-1,745,012	149%
2013	<b>3,218,926</b>	4,918,528	-1,699,602	153%
2014	<b>3,156,085</b>	4,853,206	-1,697,121	154%
2015	<b>3,014,440</b>	4,934,940	-1,920,500	164%
2016	<b>2,396,096</b>	4,754,428	-2,358,332	198%

*/s/ Merrick J. Wayne*

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CHICAGO JUSTICE PROJECT

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**CERTIFICATE OF SERVICE**

I, Merrick J. Wayne, certify that on March 17, 2021, I caused the foregoing PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS to be served via electronic mail on all counsel of record.

*/s/ Merrick J. Wayne*