

# Exhibit 14

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Jermaine Wilson, et al.,                     )  
  )  
                              *Plaintiffs,*        )  
  )  
                              -*vs-*                 )     14-cv-8347  
  )  
City of Evanston, Illinois,                 )     (*Judge Lee*)  
  )  
                              *Defendant.*        )

**RESPONSE TO REQUEST TO ADMIT OF  
PLAINTIFF SANDERS**

Plaintiff Sanders, by counsel, submits the following in response to  
defendant First Request to Admit:

1. You signed the "Notification Regarding Your Property" section of the Prisoner Property Receipt (document produced by the City in discovery Bates stamped as EV 1009) for the Subject Arrest.

**ANSWER: Admitted for the purposes of this action only.**

2. In the "Owner's Acknowledgment" section of the Prisoner Property Receipt (document produced by the City in discovery Bates stamped as EV 1009) for the Subject Arrest, you identified Jessica Mosley as the person authorized to retrieve your belongings in your absence.

**ANSWER: Admitted for the purposes of this action only.**

3. Jessica Mosley failed to retrieve the Subject Inventoried Personal Property for you.

**ANSWER: Admitted for the purposes of this action only.**

4. You had an individual named William Lee contact the Evanston Police Department to retrieve the Subject Inventoried Personal Property for you.

**ANSWER: Admitted for the purposes of this action only.**

5. On your behalf on or about August 27, 2013, William Lee made a request to the Evanston Police Department to hold the Subject Inventoried Personal Property for an additional 30 days.

**ANSWER: Admitted for the purposes of this action only.**

6. William Lee failed to retrieve the Subject Inventoried Personal Property for you.

**ANSWER: Admitted for the purposes of this action only.**

7. On July 26, 2013, the Evanston Police Department transferred you to the custody of the Sheriff of Cook County in the Subject Criminal Case.

**ANSWER: Admitted for the purposes of this action only.**

8. On July 26, 2013, you appeared in court at the 2nd Municipal District of the Circuit Court of Cook County in Skokie, Illinois, for a bond hearing in the Subject Criminal Case.

**ANSWER: Admitted for the purposes of this action only.**

9. At the July 26, 2013 bond hearing in the Subject Criminal Case, you were represented by an attorney from the Public Defender of Cook County.

**ANSWER: Admitted for the purposes of this action only.**

10. You did not have your bond hearing attorney in the Subject Criminal Case contact the Evanston Police Department to obtain the return of the Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

11. You did not obtain a court order at your July 26, 2013 bond hearing in the Subject Criminal Case for the return of the Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

12. At all times during the Subject Criminal Case, you were represented by an attorney.

**ANSWER: Admitted for the purposes of this action only.**

13. At no time during the Subject Criminal Case did you have your criminal defense attorney contact the Evanston Police Department to obtain the return of the Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

14. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to a telephone.

**ANSWER: Admitted for the purposes of this action only.**

15. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you failed to personally contact the Evanston Police Department by telephone to obtain the return of the Subject Inventoried Personal Property.

**ANSWER: Admitted for the purposes of this action only.**

16. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of Corrections to assist you in resolving any of your complaints or grievances.

**ANSWER: Admitted for the purposes of this action only.**

17. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of Corrections to connect you with your family.

**ANSWER: Admitted for the purposes of this action only.**

18. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of Corrections to connect you with your friends.

**ANSWER: Admitted for the purposes of this action only.**

19. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of Corrections agency to connect you with your criminal defense attorney.

**ANSWER: Admitted for the purposes of this action only.**

20. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of Corrections to make telephone calls on your behalf.

**ANSWER: Admitted for the purposes of this action only.**

21. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of

Corrections to assist you in obtaining the release of your personal property from the Cook County Department of Corrections.

**ANSWER: Admitted for the purposes of this action only.**

22. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to Correctional Rehabilitation Workers from the Cook County Department of Corrections to assist you in retrieving the Subject Inventoried Personal Property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

23. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had in your possession the Prisoner Property Receipt (document produced by the City in discovery Bates stamped as EV1009) for the Subject Inventoried Personal Property.

**ANSWER: Admitted for the purposes of this action only.**

24. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you had access to the Prisoner Property Receipt (document produced by the City in discovery Bates stamped as EV1009) for the Subject Inventoried Personal Property.

**ANSWER: Admitted for the purposes of this action only.**

25. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you never contacted the Evanston Police Department by telephone to retrieve the Subject Inventoried Personal Property.

**ANSWER: Admitted for the purposes of this action only.**

26. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you never utilized any Correctional Rehabilitation Workers from the Cook County Department of Corrections to contact the Evanston Police Department on your behalf to retrieve the Subject Inventoried Personal Property.

**ANSWER: Admitted for the purposes of this action only.**

27. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you never utilized any Correctional Rehabilitation Workers from the Cook County Department of Corrections to obtain access to the Prisoner Property Receipt (document produced by the City in discovery Bates stamped as EV1009) for the Subject Inventoried Personal Property.

**ANSWER: Admitted for the purposes of this action only.**

28. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you never utilized any Correctional Rehabilitation Workers from the Cook County Department of Corrections to contact any of your family members on your behalf to retrieve the Subject Inventoried Personal Property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

29. While in custody of the Cook County Department of Corrections for the Subject Criminal Case, you never utilized any Correctional Rehabilitation Workers from the Cook County Department of Corrections to contact any of your friends on your behalf to retrieve the Subject Inventoried Personal Property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

30. You did not obtain a court order at the August 7, 2013 court date in the Subject Criminal Case for the return of the Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

31. You did not obtain a court order at the September 4, 2013 court date in the Subject Criminal Case for the return of the Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

32. You did not obtain a court order at the September 11, 2013 court date in the Subject Criminal Case for the return of your Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

33. You did not obtain a court order at the October 23, 2013 court date in the Subject Criminal Case for the return of your Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

34. On October 23, 2013 in the Subject Criminal Case you were out of custody of the Cook County Department of Correction on bond.

**ANSWER: Denied.**

35. While out on bond in the Subject Criminal Case, you failed to personally appear at the Evanston Police Department to retrieve the Subject Inventoried Personal Property.

**ANSWER: Denied.**

36. While out on bond in the Subject Criminal Case, you failed to retrieve the Subject Inventoried Personal Property from the Evanston Police Department.

**ANSWER: Denied.**

37. You did not obtain a court order at the November 18, 2013 court date in the Subject Criminal Case for the return of the Subject Inventoried Personal Property to you.

**ANSWER: Admitted for the purposes of this action only.**

38. On November 18, 2013, you entered a guilty plea in the Subject Criminal Case.

**ANSWER: Admitted for the purposes of this action only.**

39. On November 18, 2013, you were found guilty of the criminal charges in the Subject Criminal Case.

**ANSWER: Admitted for the purposes of this action only.**

40. At no time did you personally contact the Evanston Police Department to obtain an extension of the period of time for said police department to hold the Subject Inventoried Prisoner Property.

**ANSWER: Admitted for the purposes of this action only.**

41. At no time between November 18, 2013 and April 7, 2014, did you have any family members contact the Evanston Police Department on your behalf to retrieve the Subject Inventoried Personal Property for you.

**ANSWER: Admitted for the purposes of this action only.**

42. At no time between November 18, 2013 and April 7, 2014, did you have any friends contact the Evanston Police Department on your behalf to retrieve the Subject Inventoried Personal Property for you.

**ANSWER: Admitted for the purposes of this action only.**

43. At no time between November 18, 2013 and April 7, 2014 did you have any attorney representing you contact the Evanston Police Department on your behalf to retrieve the Subject Inventoried Personal Property for you.

**ANSWER: Admitted for the purposes of this action only.**

44. The Evanston Police Department arrested you at times prior to the Subject Arrest.

**ANSWER: Admitted for the purposes of this action only.**

45. The Evanston Police Department arrested you at times after the Subject Arrest.

**ANSWER: Admitted for the purposes of this action only.**

46. On July 31, 2010, you were arrested by the Evanston Police Department in Department Case Number 10-020962.

**ANSWER: Admitted for the purposes of this action only.**

47. In connection with your July 31, 2010 arrest, you had personal property inventoried by the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

48. Concerning your July 31, 2010 arrest, you gave Lisa Sanders permission to retrieve your personal property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

49. Concerning your July 31, 2010 arrest, Lisa Sanders retrieved your personal property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

50. Lisa Sanders is your mother.

**ANSWER: Admitted for the purposes of this action only.**

51. On May 7, 2011, you were arrested by the Evanston Police Department in Department Case Number 11-008543.

**ANSWER: Admitted for the purposes of this action only.**

52. In connection with your May 7, 2011 arrest, you had personal property inventoried by the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

53. Concerning your May 7, 2011 arrest, you gave Lisa Sanders permission to retrieve your personal property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

54. Concerning your May 7, 2011 arrest, Lisa Sanders retrieved your personal property from the Evanston Police Department.

**ANSWER: Admitted for the purposes of this action only.**

55. On July 21, 2014, you were arrested by the Evanston Police Department in Department Case Number 14-021291.

**ANSWER: Admitted for the purposes of this action only.**



56. In connection with your July 21, 2014 arrest, you had personal property inventoried by the Evanston Police Department.

ANSWER: Admitted for the purposes of this action only.

57. Concerning your July 21, 2014 arrest, you gave permission to Terrance Mark Sanders to retrieve your personal property from the Evanston Police Department.

ANSWER: Admitted for the purposes of this action only.

58. Concerning your July 21, 2014 arrest, Terrance Mark Sanders retrieved your personal property from the Evanston Police Department.

ANSWER: Admitted for the purposes of this action only.

59. Terrance Mark Sanders is your brother.

ANSWER: Admitted for the purposes of this action only.

60. On November 22, 2015, you were arrested by the Evanston Police Department in Department Case Number 15-035125.

ANSWER: Admitted for the purposes of this action only.

61. In connection with your November 22, 2015 arrest, you had personal property inventoried by the Evanston Police Department.

ANSWER: Admitted for the purposes of this action only.

62. Concerning your November 22, 2015 arrest, you authorized Robert Sanders, Lisa Sanders, or Terrance Sanders to retrieve your personal property from the Evanston Police Department.

ANSWER: Admitted for the purposes of this action only.

63. Concerning your November 22, 2015 arrest, Robert Sanders retrieved your personal property from the Evanston Police Department.

ANSWER: Admitted for the purposes of this action only.

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
ARDC 830399  
Joel A. Flaxman  
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## **CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing on

W. Grant Farrar  
Henry J. Ford, Jr.  
City of Evanston, Law Department  
2100 Ridge Ave. #4400  
Evanston, IL 60201

by email to [gfarrar@cityofevanston.org](mailto:gfarrar@cityofevanston.org) and [hford@cityofevanston.org](mailto:hford@cityofevanston.org) this

19th day of October, 2016.

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
*an attorney for plaintiff*