

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

ALLEN JACKSON, )  
 )  
 Plaintiff, ) ) No. 18 C 5121  
 )  
 v ) ) Honorable Elaine E. Bucklo  
 )  
 CITY OF CHICAGO, et al., ) )  
 )  
 Defendants. )

**DEFENDANT OFFICERS' RULE 26(A)(1) DISCLOSURES**

Defendants Alvin Jones and Elsworth Smith, Jr., (collectively, "Defendant Officers"), by and through their counsel, and for their Rule 26(a)(1) Disclosures, state as follows:

**RULE 26(a)(1)(A)(i):** The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Alvin Jones, may be contacted through undersigned counsel, likely has discoverable information concerning Plaintiff's January 16, 2006 arrest, November 23, 2005 arrest and February 21, 2002 arrest.
2. Patrick Boyle, 155 North Michigan Avenue, Suite 562, may have discoverable information regarding the criminal prosecutions against Plaintiff stemming from his January 16, 2006 arrest and November 23, 2005 arrest.
3. Allen Jackson, has discoverable information regarding the facts and circumstances of his arrest and the allegations made in his civil lawsuit.
4. Elsworth Smith, may be contacted through undersigned counsel, likely has discoverable information concerning Plaintiff's January 16, 2006 arrest.
5. Officer A. Block, may be contacted through counsel for the City of Chicago, may have discoverable information regarding Plaintiff's processing for his January 16, 2006 arrest.
6. Sgt. Lawrence Stec, may be contacted through counsel for the City of Chicago, may have discovery information about his investigation into narcotics overdoses in the Ida B. Wells in April 2006 from the "Renegade," "911," "Cash Money," and "Blue Devil" heroin lines.

7. Officer S. McCabe, may be contacted through counsel for the City of Chicago, may have discoverable information concerning his investigation into narcotics overdoes in the Ida B. Wells in April 2006 from the “Renegade,” “911,” “Cash Money,” and “Blue Devil” heroin lines.
8. Monica Kinslow may have discoverable information concerning the forensic testing on the narcotics recovered from Plaintiff during his January 16, 2006 arrest.
9. Robert Gonzalez, may be contacted through undersigned counsel, likely has discoverable information concerning Plaintiff’s February 23, 2005 arrest.
10. Officer Benford, star number 16561, may be contacted through counsel for the City of Chicago, may have discoverable information concerning Plaintiff’s February 17, 2005 arrest.
11. Officer Sautkus, star number 10609, may be contacted through counsel for the City of Chicago, may have discoverable information concerning Plaintiff’s May 20, 2002 arrest.
12. Officer Stanford, star number 10992, may be contacted through counsel for the City of Chicago, may have discoverable information concerning Plaintiff’s November 23, 2005 arrest and July 17, 2001 arrest.
13. Officer Ferenzi, star number 16037, may be contacted through counsel for the City of Chicago, may have discoverable information concerning Plaintiff’s June 22, 2001 arrest.
14. R. Crossley, may be contacted through counsel for the City of Chicago, may have discoverable information regarding Plaintiff’s processing during his January 16, 2006 arrest.
15. J. Fludder, may be contacted through counsel for the City of Chicago, may have discoverable information concerning Plaintiff’s processing during his January 16, 2006 arrest.
16. Elias Voulgaris, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
17. Robert Cervenka, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
18. Tony Di Cristofano, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included

law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.

19. Alice Del Raso, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
20. Dave Hindman, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development. Officer Hindman may have knowledge of operating as an undercover police officer who purchased narcotics from Shaun James on February 9, 2005 (buy 2); Darnell Holmes on February 17, 2005 (buy 6); Taurus Smith on February 22, 2005 (buy 8); and Taurus Smith on February 23, 2005 (buy 9).
21. Dan Allen, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
22. John Rytina, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
23. Tony Green, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
24. John Xiques, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
25. Dennis Hurd, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
26. Oscar Brown, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.

27. Sterling Terry, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development. Officer Terry may have knowledge regarding being an undercover police officer and buying narcotics from Angelo Shenault on May 17, 2005 (buy 43).
28. Phil Hernandez, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
29. Dave Hernandez, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
30. Joseph Martorano, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development. Officer Martorano may have knowledge of ripping Allen Jackson of one hundred and sixty-nine dollars of drug proceeds (rip 10) on March 8, 2005; ripping Angelo Shenault of \$440.00 on May 17, 2005 (rip 20).
31. Timothy Williams, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development. Officer Williams may have knowledge of operating as an undercover officer and purchasing narcotics from Goleather Jefferson on March 4, 2005 (buy 12); Taurus Smith on March 8, 2005 (buy 13); and Allen Jackson on April 26, 2005 (buy 29).
32. John Killackey, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
33. Walter Green, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.
34. Martin Gainer, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.

35. Steven Dziak, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.

36. James Clarke, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.

37. Angela McGee, may be contacted via counsel at Reiter Burns, LLP. Has knowledge regarding criminal activity uncovered in Operation “Sin City I, II, III, IV, V” that included law enforcement investigations into gang violence and illegal narcotics activity occurring within the IDA B. Wells Housing development.

The Defendant Officers adopt and incorporate the list of witnesses identified by all parties in the cases that are joined with this one for discovery purposes.

**RULE 26(a)(1)(A)(ii):** A copy of—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

**RESPONSE:** Defendant Officers may rely on documents bates stamped DO-JOINT005391 to DO-JOINT005421 and produced with this Rule 26(a)(1) Disclosure. This disclosure is not intended to be a final list of possible documents or records to be used at trial in this matter. Defendant Officers reserve the right to supplement this disclosure as the investigation of this matter continues and other materials become available. Defendant Officers further reserve the right to rely on documents and other records disclosed by plaintiff or co-defendants during the trial of this matter. Investigation continues.

DO-JOINT005391	DO-JOINT005395	Arrest Report- Jackson, Allen CB #16374259
DO-JOINT005396	DO-JOINT005401	Certified Statement of Disposition- Allen Jackson 05CR1955307
DO-JOINT005402	DO-JOINT005406	Certified Statement of Disposition- Allen Jackson 06CR0337501
DO-JOINT005407	DO-JOINT005421	Criminal History Report- Jackson, Allen

**RULE 26(a)(1)(A)(iii):** A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

**RESPONSE:** Not applicable.

**RULE 26(a)(1)(A)(iv):** For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**RESPONSE:** It is the Defendant Officers' understanding that the City of Chicago will make available any such insurance agreement.

Respectfully submitted,

**Dated:** February 4, 2019

/s/ Brian Stefanich  
One of the attorneys for Defendant Officers

Andrew M. Hale  
William Bazerek  
Anthony Zecchin  
Allyson West  
Brian Stefanich  
HALE LAW LLC  
53 W. Jackson Blvd., Suite 330  
Chicago, IL 60604  
(312) 341-9646