

EXHIBIT 4

EXPERT OPINIONS OF DR. JON M. SHANE

SUBMITTED TO:

Joel Flaxman
Law Offices of Kenneth N. Flaxman P.C.
200 S Michigan Ave, Ste 201
Chicago, IL 60604

July 9, 2024

PERTAINING TO:

William Carter v. City of Chicago, et al.

In The United States District Court For The Northern District Of
Illinois Eastern Division

Case No: 17-cv-7241

Chicago, Illinois

PREPARED BY:

Dr. Jon M. Shane
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I am Dr. Jon M. Shane. I previously submitted an expert report in the cases of *White v. Chicago*, *Gipson v. Chicago*, and *Baker & Glenn v. Chicago* dated April 1, 2024. I also submitted a supplemental report in *White v. Chicago* and *Gipson v. Chicago* dated June 27, 2024. Those reports and their attachments are incorporated here.

In addition to the material discussed in those reports, I have reviewed the arrest reports and vice case reports for the arrests of William Carter on March 3, 2004, June 18, 2004, and May 19, 2006. The Bates numbers are as follows:

- | | |
|-----------------------------------|-----------------------|
| 1. March 3, 2004 Arrest Report | DO-JOINT 021009 |
| 2. March 3, 2004 Vice Case Report | CITY-BG-031082-031083 |
| 3. June 18, 2004 Arrest Report | CITY-BG-031023-031024 |
| 4. June 18, 2004 Vice Case Report | CITY-BG-031088-031089 |
| 5. May 19, 2006 Arrest Report | CITY-BG-031037-031041 |
| 6. May 19, 2006 Vice Case Report | CITY-BG-031095-031096 |

The vice case report for the arrest on June 18, 2004, and the vice case report for the arrest on May 19, 2006 are consistent with the practice that I discussed at pages 107-108 in my report dated April 1, 2024 of listing all officers on the team as participants in arrests even if some members of the team were not present. As I explained in my report dated April 1, 2024, this practice falls below nationally accepted standards.

The reports for Mr. Carter's arrests also follow the practice I discussed at page 113 in my report dated April 1, 2024 of not identifying which officers are referred to in the report. The arrest report and vice case report for March 3, 2004 states that "R/O" and "R/O's" (which I understand to mean "Reporting Officer" and "Reporting Officers") made certain observations and took certain actions, but does not identify the officer or officers who made the observations and took the actions.

Similarly, the arrest reports for June 18, 2004 and May 19, 2006 state actions and observations of "A/O" and "A/Os" (which I understand to mean "Arresting Officer" and "Arresting Officers") without identifying the officer or officers who took those actions or made those observations. And the Vice Case Reports for June 18, 2004 and May 19, 2006 contain unexplained references to the actions and observations of "R/O" and "R/Os."

As I explained at page 113 in my report dated April 1, 2024, the practice of failing to provide the name of the officers who made the relevant observations and took the relevant actions falls below nationally accepted standards and could hamper an arrestee's defense of the charges

brought against him by providing a roadblock to his ability to question the officers and otherwise defend against the charges.

ACKNOWLEDGEMENT

This report provides my opinion based on the available information at this time. I presume the information provided to me is accurate and correct. If additional information becomes available at a later time, then I may submit a supplemental report. Depending on the new information, my opinion in this report may or may not change. My opinion is based upon a reasonable degree of professional certainty.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 9, 2024

/s/ Jon M. Shane

Jon Shane