

Exhibit 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Derrick Schaeffer,	)	
	)	
Plaintiff,	)	
	)	No. 19 CV 7711
v.	)	
	)	
City of Chicago, Officer James A. Brandon,	)	
#7634, Officer Mario Perez #18936,	)	
Officer James Kinsey #16189, Detective	)	
Jocelyn Gregoire-Watkins #20974,	)	
	)	
Defendants.	)	
	)	
COOK COUNTY STATE'S ATTORNEY'S	)	
OFFICE,	)	
	)	
Respondent in Discovery.	)	

**PRIVILEGE LOG FOR THE COOK COUNTY STATE'S ATTORNEY'S CRIMINAL
FILE 17 CR 2771, THE PEOPLE OF THE STATE OF ILLINOIS V. DERRICK
SCHAEFFER, BATES STAMPED PAGES CCSAO 001-0171.**

ABBREVIATIONS USED:

CCSAO	=	COOK COUNTY STATE'S ATTORNEY'S OFFICE
CPD	=	CHICAGO POLICE DEPARTMENT
DOB	=	DATE OF BIRTH
SSN	=	SOCIAL SECURITY NUMBER
VIN	=	VEHICLE IDENTIFICATION NUMBER
ID	=	STATE ISSUED IDENTIFICATION NUMBER (non-criminal identifier)
HIPAA	=	HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT
NCIC	=	NATIONAL CRIME INFORMATION CENTER
PC	=	PERSONAL COMPUTER

Bates number(s) redacted	Document-privilege asserted	Author	Entire page
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18,	<u>Blue Back</u>	Assistant State's Attorney	Yes
	<u>CCSAO Trial preparation/ Attorney</u>		

	<u>notes:</u> Privileged from disclosure pursuant to 725 ILCS 5/112-6 Work product/ mental impression/ deliberative process Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i>, 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i>, 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i>, 2017 IL App 1st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i>, 2014 IL App (1st) 131824, ¶24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010) Privilege: Non-Offender phone number 725 ILCS 120/4		
19 - 30	<u>Grand Jury Information</u> Privileged from disclosure pursuant to 725 ILCD 5/112-6 (Secrecy of Grand Jury Proceedings)	Assistant State's Attorney	Yes

	<u>Indictment information return sheet showing Grand Jury findings: March 1, 2017 #000026</u> <u>Information: #000027, #000028 March 9, 2017</u> <u>Oath: #29 ASA Cathy Hufford</u> <u>Felony Minute Sheet – Form 101 #000030: February 1, 2017</u>		
20,	<u>CCSAO Trial preparation/ Attorney notes</u> <u>Matech: Cook County Assistant State's Attorney- Attorney notes relating to communications with opposing counsel: handwritten notes showing prosecution strategy; Witness communication #000020: March 9, 2017</u> Work product/ mental impression/ deliberative process Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i> , 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i> , 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i> , 2017 IL App 1 st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i> , 2014 IL App (1st) 131824, ¶ 24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i> , 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i> , 433 F.3d 946, 949 (7th Cir. 2006).	Assistant State's Attorney	No

	<i>Sandra T.E. v. South Berwyn School Dist. 100</i> , 600 F.3d 612 (7th Cir. 2010)		
21-23, 25, 103	<u>CCSAO Trial preparation/ Attorney notes</u> <u>Matech: Cook County Assistant State's Attorney- Attorney notes relating to communications with opposing counsel: handwritten notes showing prosecution strategy; Witness communication #000021:</u> <u>#000022: June 13, 2018</u> <u>#000023: February 6, 2019</u> <u>Term Counter: #000024:</u> <u>#000024: May 6, 2019</u> <u>#000025: May 5, 2017</u> Work product/ mental impression/ deliberative process Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i>, 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i>, 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i>, 2017 IL App 1st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i>, 2014 IL App (1st) 131824, ¶ 24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949	Assistant State's Attorney	Yes

	(7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010)		
30,	<u>Felony Minute Sheet Form 101</u> Privacy: Witness address, phone number 725 ILCS 120/4 Attorney work product & attorney/client privileges Deliberative process/Investigative privilege Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i>, 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i>, 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i>, 2017 IL App 1st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i>, 2014 IL App (1st) 131824, ¶ 24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010)	Assistant State's Attorney	Yes

31	<u>Disposition Work Sheet</u> <u>February 27, 2017</u> Author: ASA D'Angelo Privacy: Janice Branscomb: Witness address, DOB Harold James Fields: Witness address, DOB Cheryl Young: Witness address, DOB 725 ILCS 120/4	Assistant State's Attorney	No
33, 34, 35, 62 – 64, 158	<u>CPD Original Case Incident Report</u> <u>Printed: March 22, 2017</u> Privacy: Janice Branscomb: Witness address, DOB Harold James Fields: Witness address, DOB Cheryl Young: Witness address, DOB; Officer PC number #000033 - #000035; #000062 – 000064; #000158 725 ILCS 120/4	Chicago Police Department: Officer Fashingbauer; James Brandon	No
36 - 40, 161 - 164	<u>CPD Arrest Report</u> <u>Printed: March 22, 2017</u> Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i> , 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i> , 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i> , 2017 IL App 1 st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i> , 2014 IL App (1st) 131824, ¶	Chicago Police Department: Officer William Fashingbauer	No

	<u>24, 387 Ill. Dec. 819, 23 N.E.3d 511</u> <i>Rule 26(b)(3)</i> of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010) Privacy: Janice Branscomb: Witness address, DOB Harold James Fields: Witness address, DOB Cheryl Young: Witness address, DOB; Chicago Police Department: Stacey Coller D. F. Fowler D. T. West G. E. Braxton J. A. Kinsey J. B. Eisinas E. Mishler Officer PC number #000036 - #000040 725 ILCS 120/4		
41 - 49	<u>CPD Case Supplementary Report February 1, 2017</u> Privacy: Janice Branscomb: Witness address, DOB Harold James Fields: Witness address, DOB Cheryl Young: Witness address, DOB	Chicago Police Department: Officer William Fashingbauer	No

	725 ILCS 120/4		
52, 53	<u>Answer to People's Motion for Pre-trial Discovery</u> <u>Filed: October 24, 2017</u> Janice Branscomb: Witness address, DOB Cheryl Young: Witness address Privacy: Witness address, DOB 725 ILCS 120/4	Office of Cook County Public Defender: Samantha Washlow Cook County Assistant Public Defender: Juanita Lawson-Robinson	No
55	<u>Subpoena Request Form</u> <u>March 25, 2019</u> Janice Branscomb: Witness address, DOB Cheryl Young: Witness address Privacy: Witness address, DOB 725 ILCS 120/4	Assistant State's Attorney: Daniel Falkgren	Yes
57 – 60, 66, 87, 112, 115	<u>Subpoena</u> <u>February 7, 2019;</u> <u>May 26, 2019</u> Privacy: Janice Branscomb: Witness address, DOB Cheryl Young: Witness address 725 ILCS 120/4	Assistant State's Attorney: Naheda Zayyad	No
67, 89	<u>DL/ID Image Retrieval</u> Cheryl T. Young Privacy: Witness DOB, phone number, SSN, address, Driver License/ID number February 20, 2019 725 ILCS 120/4	Secretary of State	No
68, 69, 95 –	<u>LEADS Criminal Background</u>	Assistant State's	Yes

97, 105 – 110, 122 – 134, 156	Protected from disclosure for law enforcement purposes only. 20 Ill. Admin Code. 1240.110 Deliberative process/Work product Privacy: Witness DOB, phone number, SSN, address, Driver License/ID number 725 ILCS 120/4	Attorney	
70 – 78, 90 – 94, 113	<u>Lexis Nexis Person Report</u> Privacy: Witness DOB, phone number, SSN, address, Driver License/ID number, VIN, License plate number, court filings 725 ILCS 120/4	Assistant State's Attorney	Yes
84	<u>Office of Emergency Management and Communication CPD Event Query Report: February 4, 2017</u> Amari K Dawson Privacy: Witness phone number, DL; Officer PC number, CPD employee identification number		
79 - 81	<u>Office of Emergency Management and Communication CPD Event Query Report: February 1, 2017</u> Privacy: Witness phone number, DL; Officer PC number, CPD employee identification number 725 ILCS 120/4		No
100 - 102	<u>Criminal Code</u>	Assistant State's Attorney	Yes

	Privileged from disclosure pursuant to 725 ILCS 5/112-6 Work product/ mental impression/ deliberative process Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i>, 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i>, 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i>, 2017 IL App 1st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i>, 2014 IL App (1st) 131824, ¶24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010)		
65, 86, 103, 111, 114, 117 - 119	<u>CCSAO Investigations Bureau Request Form</u> February 11, 2019 Janice Branscomb Privacy: Witness phone number, DL; Officer PC number, CPD employee identification number: Social Security Number 725 ILCS 120/4	Assistant State's Attorney: Naheda Zayyad	Yes
88, 104	<u>CCSAO Investigative Report</u>	Assistant State's	Yes

	Privileged from disclosure pursuant to 725 ILCS 5/112-6 Work product/ mental impression/ deliberative process Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i>, 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i>, 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i>, 2017 IL App 1st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i>, 2014 IL App (1st) 131824, ¶24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010) Privilege: Non-Offender phone number 725 ILCS 120/4	Attorney	
95 - 97	<u>Interstate Identification Index</u> Privacy: Witness address, DOB, 725 ILCS 120/4	Assistant State's Attorney	No

120, 121	<u>Cook County Sheriff Inmate Web Page</u>	Cook County Sheriff	Yes
166 – 170	<u>Crimes Summary Sheet</u> Privileged from disclosure pursuant to 725 ILCS 5/112-6 Work product/ mental impression/ deliberative process Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i> , 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i> , 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i> , 2017 IL App 1 st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i> , 2014 IL App (1st) 131824, ¶ 24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i> , 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i> , 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist.</i> 100, 600 F.3d 612 (7th Cir. 2010)	Assistant State's Attorney	Yes
171	<u>ASA Internal Memo</u> Privileged from disclosure pursuant to 725 ILCS 5/112-6 Work product/ mental impression/ deliberative process	Assistant State's Attorney	Yes

	Supreme Court Rule 201(b)(2) <i>Fischel & Kahn, Ltd. v. Van Stratten Gallery, Inc.</i>, 189 Ill. 2d 579, (2000), citing <i>Hickman v. Taylor</i>, 329 U.S. 495 (1947) <i>King Koil Licensing Co. v. Harris</i>, 2017 IL App 1st 161019 ¶78-79 <i>BorgWarner, Inc. v. Kuhlman Electric Corp.</i>, 2014 IL App (1st) 131824, ¶24, 387 Ill. Dec. 819, 23 N.E.3d 511 Rule 26(b)(3) of the Federal Rules of Civil Procedure <i>Timmerman's Ranch and Saddle Shop, Inc., v. Pace</i>, 2016 U.S. Dist. LEXIS 40493 <i>Hobley v. Burge</i>, 433 F.3d 946, 949 (7th Cir. 2006). <i>Sandra T.E. v. South Berwyn School Dist. 100</i>, 600 F.3d 612 (7th Cir. 2010)		
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