

EXHIBIT A

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

Derrick Schaeffer)	
)	
)	Case No. 19-CV-7711
Plaintiff,)	
)	Judge Robert M. Dow, Jr.
v.)	
)	Magistrate Judge Jeffrey T. Gilbert
City of Chicago, et al.)	
)	
Defendants.)	

**UPDATED PRIVILEGE LOG FOR NON-PARTY 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:

ASA	=	ASSISTANT STATE'S ATTORNEY
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)

Bates number(s)	Document-privilege asserted	Source	Partial redaction
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18,	Witness address: phone number Personal identifying information. Pursuant to Rule 45(e)(2)(a)	Various	Yes
21	Work product/ deliberative privilege	ASA (Blueback)	Yes
30	Witness address: phone number Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
31	Witness address: phone number: DOB - Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
32	Work product/ deliberative process	ASA (Crimes Fact Sheet)	Yes

33, 37, 39, 41, 42, 44 - 46	Witness's address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
52, 53, 55, 57 - 59	Witness's address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
62	Witness's address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
65 – 67	Witness's address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
57 – 60, 66, 87, 111, 112, 115	Witness Phone number, DL, email address Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
89	Witness Phone number, DL Personal identifying information Pursuant to Rule 45(e)(2)(a)	Illinois Secretary of State	Yes
68, 69	<u>LEADS</u> - inquiry as to criminal history <u>Cheryl T. Young</u> 20 Ill. Adm. Code 1240.80(d), provides that LEADS data shall not be disseminated to any individual or organization <i>that is not legally authorized</i> to have access to the information. Parties can only receive such data if the ISP itself authorized the user to do so.	Illinois State Police	No – entire page redacted
95 - 97	<u>LEADS</u> - inquiry as to criminal history <u>Janice Branscomb</u> 20 Ill. Adm. Code 1240.80(d), provides that LEADS data shall not be disseminated to any individual or organization <i>that is not legally authorized</i> to have access to the information. Parties can only receive such data if the ISP itself authorized the user to do so.	Illinois State Police	No – entire page redacted
122 – 134, 156	<u>LEADS</u> - inquiry as to criminal history	Illinois State Police	No – entire page redacted

	<u>Derrick Schaeffer</u> 20 Ill. Adm. Code 1240.80(d), provides that LEADS data shall not be disseminated to any individual or organization <i>that is not legally</i> <i>authorized</i> to have access to the information. Parties can only receive such data if the ISP itself authorized the user to do so.		
70 – 78, 90 – 94, 113	Witness's address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
84	Witness Phone number, DL Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
103, 104	Witness Phone number, DL Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
111, 114, 117 - 119	Witness's SSN Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
88, 104	Witness address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
148	Witness Phone number Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes
163	Witness Phone number, address, DOB Personal identifying information Pursuant to Rule 45(e)(2)(a)	Various	Yes