

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

Anthony Murdock, et al.,)	
)	
Plaintiff,)	
)	20-cv-1440
-vs-)	
)	Judge Feinerman
City of Chicago,)	
)	
Defendant.)	

DECLARATION OF DIRECTOR KAREN CONWAY

The undersigned states as follows:

1. I, Karen Conway, am the Director of Research and Development at the Chicago Police Department (“CPD”). I am authorized to make this declaration on behalf of CPD.
2. CPD is a department of the City of Chicago. It was created by and operates pursuant to the provisions of Chapter 2-84-010 of the Municipal Code of the City of Chicago.
3. This declaration is based on my professional experience and a review of the records described in this declaration over which CPD has asserted deliberative process, attorney-client, or attorney work product privileges.
4. I understand Plaintiff has requested documents in this matter regarding the creation, preparation, modification, review, or revision of CPD Special Order S06-12-02 from July 6th, 2015 to present.
5. The privilege log attached hereto as Exhibit A identifies the contents of a “Task File” created by CPD, indicating the privileges that CPD is asserting for each document.
6. CPD is asserting the deliberative process and other privileges, as indicated, over these records identified in the attached privilege log after careful consideration of the need to maintain the confidentiality of these records.
7. Releasing Task Files would have a chilling effect on the ability of CPD personnel to engage in free, open, collaborative discussions precedent to CPD’s final policy determination. These discussions and internal thought processes are critical to the deliberative process because they allow individuals to freely exchange and challenge differing opinions.

8. Insuring that final departmental policy determinations are well-reasoned is important to all individuals interested in well-reasoned law enforcement policies. Comparison of the current S06-12-02 and the 13 June 2013 version allows the parties, and the public, to see what changes were made, without create a chilling effect on the free flow of ideas and thoughts in future deliberations.

9. I declare, pursuant to 28 U.S.C. Sec. 1746, under penalty of perjury, that the foregoing is true and correct.



Karen Conway

Director

Research and Development
Chicago Police Department

Date

