UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOMINIQUE TURNER, et al,	)	
	)	
Plaintiffs,	)	Case No. 21-cv-704
	)	
vs.	)	Honorable Thomas M. Durkin
	)	
CITY OF CHICAGO, et al,	)	Magistrate Judge Jeffrey Cummings
	)	
Defendants.	)	

DEFENDANT CITY OF CHICAGO'S MOTION TO DISMISS COUNTS II AND III OF PLAINTIFFS' AMENDED COMPLAINT; AND FOR LEAVE TO JOIN MOTION TO DIMISS FILED BY DEFENDANT OFFICERS [ECF 31]

Defendant City of Chicago ("Defendant City"), by and through its attorney, Celia Meza, Corporation Counsel of the City of Chicago, pursuant to Federal Rules of Civil Procedure 12(b)(6), respectfully moves this Court to dismiss Counts II & III of Plaintiffs' Amended Complaint, for failure to state a claim; and moves this Court for leave to join the motion to dismiss previously filed by the individually-named Defendant Officers [ECF 31]. In support thereof, Defendant City states as follows:

Introduction[1]

Two separate search warrants were executed at an address occupied by Plaintiff Dominique Turner and her four minor children in the 6800 block of South Dorchester Avenue in Chicago. [ECF 26 ¶ 5]. The first warrant was executed on February 8, 2019. *Id.* ¶ 10. The second warrant was executed on April 25, 2019. *Id.* ¶ 22.

Plaintiffs' Amended Complaint contains three counts: Count I – "Constitutional Claims

[1] All facts are taken in the light most favorable to Plaintiff for the purposes of this motion only. Defendant City reserves the right to contest Plaintiffs' allegations for all other purposes.

Against Individual Defendants;" Count II – "Constitutional Claims Against Defendant City of Chicago;" Count III – "Claim under Federal Fair Housing Act." [ECF 26]. As to Count II, Plaintiff purports to allege a *Monell* claim, alleging that: "The above-described conduct of the individual defendants was carried out as a result of policies and widespread practices of defendant City of Chicago." *Id.* ¶ 34. Specifically, Plaintiff alleges defendant City of Chicago has the following widespread practices and/or policies:

A. "Code of Silence" – "At all relevant times, the City of Chicago has known of and has encouraged a 'code of silence' among its police officers." [ECF 26 ¶ 35]

B. "Excessive Force Against Children of Color" – "At all relevant times, the City of Chicago has known of and has failed to end the widespread use by Chicago police officers of excessive force against children of color, which often includes pointing guns at children." [ECF 26 ¶ 45].

C. "Defective Official Directive" – "At all relevant times, the City of Chicago's directive on search warrants, Special Order S04-19, encourages police officers to avoid verifying and corroborating information upon which they rely in seeking a search warrant. [ECF 26 ¶ 50].

D. "Lack of Discipline After Unconstitutional Raids" – "At all relevant times, the City of Chicago has maintained a discipline system that is designed to sweep under the rug unconstitutional conduct that occurs during execution of search warrants." [ECF 26 ¶ 54].

[ECF 26].

On July 30, 2021, the individually-named Defendant Officers filed a motion to dismiss Counts I & III of Plaintiff's complaint. [ECF 31]. Defendant City now moves to join that motion, and separately to dismiss Counts II & III of Plaintiffs' complaint. Count II should be dismissed because Plaintiffs have not alleged facts that would raise the inference that Defendant City was deliberately indifferent. Count III should be dismissed

LEGAL STANDARD

A motion to dismiss pursuant to Federal Rule 12(b) (6) must be granted if the challenged

pleading fails to state a claim upon which relief can be granted. *Corcoran v. Chicago Park District*, 875 F.2d 609, 611 (7th Cir. 1989). A motion to dismiss tests the sufficiency of the complaint, not the merits of the suit. *Gibson v. City of Chicago*, 910 F.2d 1510, 1520 (7th Cir. 1990). When considering a motion to dismiss, the court accepts as true all well-pleaded facts alleged by the plaintiff and all reasonable inferences to be drawn therefrom. *See Barnes v. Briley*, 420 F.3d 673, 677 (7th Cir. 2005). However, the court is not obligated to accept a complaint that simply raises the possibility of relief. *E.E.O.C. v. Concentra Health Servs., Inc*., 496 F.3d 773, 776 (7th Cir. 2007). Rather, a complaint must "state a claim to relief that is plausible on its face." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (*citing Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)). Additionally, the court should not strain to find inferences that are not plainly apparent from the face of the complaint.

In order to survive a motion to dismiss under Rule 12(b) (6), a complaint must set forth "a short and plain statement of the claim showing that the pleader is entitled to relief." (*See* Fed. R. Civ. pg. 8(a) (2)). A complaint satisfies this standard when its allegations "raise a right to relief above the speculative level." *Twombl*y, 550 U.S. at 555–56. Therefore, the complaint still needs to set forth enough factual specificity to causally connect Plaintiffs' claim to their alleged injury. *McTigue v. City of Chicago*, 60 F.3d 381, 382 (7th Cir. 1995); *see also Lowery v. Cook County*, No. 00-cv-5487, 2011 WL 185024, at *3 (N.D. Ill. Feb. 22, 2011) (Kocoras, J.). A plaintiff cannot "unlock the doors of discovery" when "armed with nothing more than conclusions." *Iqbal*, 556 U.S. at 678–79. Plaintiff "must do more than merely parrot the language of *Monell* to state a claim." *Johnson v. Johnnie*, 2011 WL 2020686, at * 3 (S.D. Ill. May 24, 2011) (*citing Hamrick v. Lewis*, 515 F. Supp. 983, 986 (N.D. Ill.1981)); *see also Brooks v. Ross*, 578 F.3d 574, 581 (7th Cir. 2009).

ARGUMENT

I. Count I. Plaintiff's Fourth and Fourteenth Amendment claims should be dismissed for failure to state a claim.

Defendant City moves for leave to join the motion to dismiss previously filed by the individually named defendants regarding Count I. [ECF 31]

II. Count II. Plaintiff's *Monell* claim should be dismissed for failure to state a claim.

To state a *Monell* claim, a plaintiff must show "(1) an action pursuant to a municipal policy, (2) culpability, meaning that **policymakers were deliberately indifferent to a known risk that the policy would lead to constitutional violations**, and (3) causation, meaning that the municipal action was the 'moving force' behind the constitutional injury." *Hall v. City of Chicago*, 95 F.3d 945, 950 (7th Cir. 2020) (emphasis added). Failure to establish any one element dooms a *Monell* claim. In *McCauley*, the Seventh Circuit held that a *Monell* claim was properly dismissed when the plaintiff alleged no more than "legal elements of the various claims." *McCauley* 671 F.3d at 618-619.

a. Plaintiffs Fail to Demonstrate the Requisite "Deliberate Indifference" Element of their *Monell* Claim

Plaintiffs have failed to plead facts supporting a reasonable inference that the City made a deliberate choice to follow an unlawful course of action. The 2019 Consent Decree and 2016 ordinance that established COPA and a Public Safety Deputy Inspector General do not permit a reasonable inference of deliberate indifference by final policymakers to claims made here by Plaintiffs, but instead represent robust efforts to implement best practices in the City's police department.

Deliberate indifference requires the municipality to have made a "deliberate choice to follow a course of action." *City of Canton v. Harris*, 489 U.S. 378, 389 (1989). "Where a §1983

plaintiff can establish that the facts available to city policymakers put them on actual or constructive notice that the particular omission is substantially certain to result in the violation of the constitutional rights of their citizens, the dictates of *Monell* are satisfied." *Id*. at 396. Only then can it be said that the municipality has made a "deliberate choice to follow a course of action . . . from among various alternatives." *Pembaur v. City of Cincinnati*, 475 U.S. 469, 483 (1986). Deliberate or reckless indifference to citizen complaints must be proved in order to establish that a failure to investigate and discipline has actually been condoned and therefore can be said to have been adopted by those responsible for making municipal policy. *Wilson v. City of Chicago*, 6 F.3d 1233, 1240 (7th Cir. 1993), *as modified on denial of reh'g* (Dec. 8, 1993). For example, throwing away complaints into a wastepaper basket or ordering investigators to pay no attention to complaints can permit an inference of failing to investigate or discipline. *Id*. at 1240.

For purposes of a failure to train claim, continued conscious adherence to an approach that municipal policymakers know or should know has failed to prevent tortious conduct by employees may establish the conscious disregard for the consequences of their action—the 'deliberate indifference'—necessary to trigger municipal liability. *Bryan County*, 520 U.S. at 407; *Connick v. Thompson*, 563 U.S. 51, 62 (2011). Even if a final policymaker's actions could be seen as negligent, or even grossly so, that is not enough under the Seventh Circuit's deliberate indifference standard. *Moore v. City of Chicago*, No. 02 C 5130, 2007 WL 3037121, at *11 (N.D. Ill. Oct. 15, 2007) (citing *Wilson v. City of Chicago*, 6 F.3d 1233, 1240 (7th Cir.1993).

Plaintiffs' primarily support their *Monell* claim by citing to reports that led to robust reforms enacted by the City of Chicago prior to the date of the incident that is the basis of Plaintiffs' complaint. [ECF 26 ¶¶ 36-47] (citing the Police Accountability Task Force ("PATF") and Department of Justice ("DOJ") reports). On October 5, 2016, the City Council passed an ordinance

that established COPA and a Public Safety Deputy within the Office of the City Inspector General.[2]

In that ordinance, the City Council specifically stated the following:

> • WHEREAS, effective oversight is essential to maintaining a professional, well-managed, ethical and properly functioning Police Department; and
>
> • WHEREAS, both the Police Department and the residents of the City whom the Police Department serves should be able to rely on an impartial, effective, and adequately-resourced oversight office to conduct objective, thorough, and independent investigations into the matters within the office jurisdiction, and
>
> • WHEREAS, Trust in the oversight office's ability to provide independent oversight is critical and must be established and maintained; and
>
> • WHEREAS; The Mayor and City Council are committed to providing the resources needed to properly investigate allegations of police misconduct, ensuring the expertise of personnel who conduct such investigations, and establishing the credibility of the investigations and inspiring the community's confidence in their quality and independence; and
>
> • WHEREAS, The Mayor of the City of Chicago ("Mayor") established the Police Accountability Task Force ("PATF") to review the system of accountability, oversight and training that is currently in place for the Police Department and recommend reforms to the current system to improve independent police oversight; and
>
> • WHEREAS, The PATF actively engaged the community, victims' rights groups, law enforcement, and youth, religious and elected leaders to ensure its findings and recommendations were based on input from all parts of the City;
>
> • WHEREAS, The PATF developed comprehensive findings and recommendations concerning community and police relations, police oversight and police accountability; and
>
> • WHEREAS, The Mayor and City Council of the City of Chicago have reviewed the findings and recommendations of the PATF, and seek to implement recommendations that address Police Department accountability and oversight by ordinance; and
>
> • WHEREAS, This ordinance establishes a two-part structure to carry out the goal of enhancing the Police Department accountability and oversight: (1) the

[2] A court can take judicial notice of an ordinance without converting a motion to dismiss into a motion for summary judgment. *Missouri Pet Breeders Ass'n v. Cty. of Cook*, 119 F. Supp. 3d 865, 869 (N.D. Ill. 2015) (citing *Newcomb v. Brennan*, 558 F.2d 825, 829 (7th Cir.1977)).

> establishment of the Civilian Police Office of Accountability to promptly, effectively and fairly investigate complaints concerning police misconduct and abuse, and incidents involving the most serious uses of force by police officers, and (2) the creation of a Deputy Inspector General to audit and review the policies, procedures, and practices of the Chicago Police Department, the Police Board, and the Civilian Office of Police Accountability, and thereby enhance transparency, accountability, and quality of oversight; now, therefore,
>
> **BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF CHICAGO**

SO2016-6309, "Amendment of Municipal Code Title 2 by repealing Chapter 2-57, adding new Chapter 2-78 and modifying Chapter 2-56 regarding police accountability," attached hereto as Exhibit A.

This ordinance shows the City's legal commitment to improving police accountability, training, and oversight, as well as providing the resources to effect that.[3] Substantively, the ordinance accorded COPA exclusive authority to investigate a variety of complaints, including unlawful seizures, improper search, excessive force, coercion, verbal abuse, officer involved shootings, taser discharges, in-custody deaths, denial of counsel, civil lawsuits, and pattern and practice investigations. Ex. A; Municipal Code § 2-78 *et seq*.[4] The ordinance also grants subpoena power and the power to recommend discipline or training. §§ 2-78-120, 2-78-130. It also requires that investigations be concluded within 6 months absent a justified extension, and contains strict deadlines for the Superintendent to respond to the discipline recommended by COPA. §§ 2-78-135, 2-78-130.

With respect to the Public Safety Deputy Inspector General, the ordinance grants authority to "make recommendations, based on its reviews and audits, to the Police Department, the Police Board and the Office with respect to changes in policies, procedures, practices, operations,

[3] Indeed, from 2017 to 2019, the publicly available appropriation ordinances establish that the City appropriated $37,354,233 to COPA. See Exhibits B, C, and D.
[4] https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2443835.

directives, training and equipment to address any deficiencies or problems or implement any improvements identified by its reviews and audits." Ex. B; Municipal Code §2- 56-230[5]. It also authorizes recommendations to other City departments and agencies that the Public Safety Deputy determines are necessary or helpful to effect its recommendations as to the Police Department and the Police Board. *Id*. The ordinance then *obligates* the Public Safety Deputy to do the following:

> • Conduct periodic analysis and evaluation of closed disciplinary investigations to identify trends and summarize the number and results of such investigations, and to issue an annual report containing the analysis and evaluation
>
> • Conduct reviews and audits or particular policies, procedures or practices of the Police Department
>
> • To review and audit closed disciplinary investigations and make findings and recommendations, including recommendations that an investigation be reopened if appropriate
>
> • To review and audit the Police Department's policies, practices, programs and training with respect to constitutional policing, discipline and use of force and to make recommendations to the City Council to address problems or deficiencies
>
> • To review, audit and analyze civil judgments and settlements against members of the Police Department
>
> • To review and audit disciplinary recommendations by the Police Department and Police Board

Ex. B, SO2016-6309; Municipal Code § 2-56-230.

Even if one were to concede that these reforms have not succeeded in eliminating or reducing police misconduct, its creation shows that the City was not deliberately indifferent to the issue. Indeed, Plaintiff has pled himself out of court in terms of the deliberate indifference element.

Furthermore, Plaintiffs have pled themselves out of court by citing to the DOJ Report. [See DOJ Report, Attached hereto as Exhibit E]. The Report shows that the City has not embraced the

[5] https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2443507#JD_2-56-230

alleged flaws in policing but has made efforts to combat them. The DOJ Report states, "During the year it took us to complete this investigation, the City of Chicago took action of its own." Ex. E at pg. 3. It went on to say, "The City has acknowledged and begun to correct a number of deficiencies related to how officers use and are held accountable for force." *Id*. at pg. 7. It notes that there have been "repeated, concerted reform efforts by the City and community members from all walks." *Id*. at pg. 16. "Throughout the time our investigation has been underway, the City has undertaken positive steps to improve its accountability structure and repair its relationship with the community, and it should be commended for this." *Id*. at pg. 48. In light of these statements from the DOJ Report, the City cannot be said to have turned a blind eye to the flaws the report addresses.

Further, *even after* the ordinance that established COPA and a Public Safety Deputy was passed, on January 31, 2019 the City voluntarily entered into a Consent Decree with the State of Illinois requiring improvements to numerous aspects of the City's policing.[6] The Consent Decree, referencing the City's commitment to "constitutional and effective law enforcement" (page 1), is 236 pages, and contains numerous commitments to impartial policing, improved hiring, use of force reforms, new training, supervision, accountability, data collection, and more.

As mentioned supra, Plaintiff alleges that "the City of Chicago has known of and has failed to end the widespread use by Chicago police officers of excessive force against children of color." [ECF 26 ¶ 45]. However, Plaintiff does **not** reference or cite any materials or facts to support an inference that the Chicago Police Department has a widespread practice of using force against children **of color** specifically**.** *Id.* at ¶¶46-49.

Plaintiff cannot allege facts that would support an inference that Defendant City was

[6] https://www.chicago.gov/content/dam/city/sites/police-reform/docs/Consent%20Decree.pdf;

deliberately indifferent to any widespread use of force against children. Indeed, Paragraph 32 of the consent decree states that:

> Within 180 days of the Effective Date, CPD will review and revise its current policies relating to youth and children and, within 365 days, will revise its training, as necessary, to ensure that CPD provides officers with guidance on developmentally appropriate responses to, and interactions with, youth and children, consistent with the provisions of this Agreement and as permitted by law.

[Consent Decree ¶ 32]. Further, Paragraph 33 states that:

> When interacting with youth and children, CPD will, as appropriate and permitted by law, encourage officers to exercise discretion to use alternatives to arrest and alternatives to referral to juvenile court, including, but not limited to: issuing warnings and providing guidance; referral to community services and resources such as mental health, drug treatment, mentoring, and counseling organizations, educational services, and other agencies; station adjustments; and civil citations.

Id. at ¶ 33.

As to arrests, Paragraph 509 of the consent decree requires the tracking of arrest practices. Paragraph 546 requires the publication of arrest data and analysis in CPD's annual report. Paragraph 550 requires the reporting of members who accrue two or more complaints of false arrest in a twelve-month period. Paragraph 587 requires an automated electronic system to include a database that will be used to collect, maintain, integrate, analyze, visualize, and retrieve data for each CPD officer, including all arrests by CPD.

Excessive force training, monitoring and reporting reforms are mentioned throughout the Consent Decree including Paragraph 586 of Section D "Early Intervention System", which states that a primary goal of implementing an automated electronic system to track arrests and incidents of excessive force is to identify "officers at elevated risk of being involved in certain types of events so that the officers can receive tailored interventions intended to reduce such risk." pg. 178, paragraph 586 of Consent Decree.

Use of force training and training on de-escalation tactics are a focus in the Consent Decree.

For example, Paragraph 188 requires that CPD incorporate training regarding pointing of a firearm in the annual use of force training. Paragraph 243 requires that CPD's pre-service and in-service training must provide officers with knowledge of policies and laws regulating the use of force; equip officers with tactics and skills, including de-escalation techniques, to prevent or reduce the need to use force or, when force must be used, to use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; and ensure appropriate supervision and accountability. Paragraph 245 requires that CPD will provide all current CPD officers with in-service use of force training on at least an annual basis, and more frequently when necessitated by developments in applicable law and CPD policy. Paragraph 248 requires that pre-service promotional training include strategies for effectively directing officers in de-escalation principles and Paragraph 334 requires that all pre-service promotional training include de-escalation strategies and the principles of force mitigation. Finally, the Consent Decree is replete with requirements that officers intervene to prevent and report incidents of excessive force by other officers. *See* Paragraphs 156, 176, 248, 334, and 413 of the Consent Decree.

These reforms indicate the *exact opposite* of deliberate indifference. They reveal a city that bound itself to improvement, oversight, and accountability for police conduct. Plaintiffs' references to past alleged misconduct is not a talisman that will open the doors to *Monell* discovery in any event, but certainly not in light of such reforms post-dating all of Plaintiffs' "*Monell"* allegations.

Deliberate indifference has a plain and ordinary meaning. Deliberate indifference is not about whether the City is perfect, or has been historically perfect. Deliberate indifference means what it says – turning a blind eye despite knowing about similar and widespread constitutional violations so numerous as to constitute a custom or usage permeating the Department. *See Rosario*

v. Brawn, 670 F.3d 816, 821 (7th Cir. 2012) ("we have consistently held that deliberate indifference requires a showing of more than mere or gross negligence."); *See also Beal v. Blache*, No. CIV.A.02-CV-12447-RG, 2005 WL 352861, at *6 (D. Mass. Feb. 14, 2005) ("perfect foresight is not the standard by which official conduct is judged.")

In *Anderson v. Allen*, the court held that a reduction in stops of African Americans—from 900,000 in 2014 to about 150,000 in 2016—actually rebutted, on a motion to dismiss, any reasonable inference of deliberate indifference. *Anderson*, 2020 WL 5891406, n.2. Per the court, "this pleaded trend shows that the City showed deliberate intention to reform and improve policing practices, not deliberate indifference to the problem[,]." *Id*.

Here, the lack of deliberate indifference is plain. The meaningful reforms outlined above clearly demonstrate a desire by final policy makers to ensure constitutional policing in Chicago. The Court can read the stated intention of the City in the form of the new legislation and throughout the Consent Decree. Ex. A. Therefore, in light of all that was publicly known in February and April of 2019, no reasonable inference can be drawn that the City was deliberately indifferent to the kind of misconduct alleged here. As a result, Plaintiff's *Monell* claim must be dismissed.

To meet the standards of *Twombly, Iqbal, McCauley* and their progeny, Plaintiffs must show rather than just say that the City's final policymaker knew that there were the widespread practices complained of and chose to effectively adopt those practices as its own. Moreover, Plaintiffs would have to show that the City's final policymaker completely failed to act despite this knowledge. Here, Plaintiffs have not pleaded facts that give plausibility to the notion that the final policymaker knew and approved of the alleged practices that Plaintiffs attribute to the City. Statements by City officials acknowledging the existence of a code of silence does not equate to the support of that code of silence, any more than the acknowledgement of any other problem

confronting a municipality – from crime rates.

Because Plaintiffs have not alleged, and cannot allege, deliberate indifference on the part of the City, Plaintiffs' *Monell* claim should be dismissed for failure to state a claim.

III. Count III. Plaintiffs' Fair Housing Act claim should be dismissed for failure to state a claim.

Defendant City moves for leave to join the motion to dismiss previously filed by the individually named defendants regarding Count III. [ECF 31]. In addition to the argument in that motion, Count III should also be dismissed because Plaintiffs have failed to allege facts that would raise the inference that the Defendants were motivated by an intent to discriminate, or that the Defendants interfered with Plaintiffs on account of protected activity under the Fair Housing Act. *See, e.g., E.-Miller v. Lake County Highway Dept.*, 421 F.3d 558, 563 (7th Cir. 2005).

To plead a claim under 42 U.S.C. §3617, a plaintiff:

> must allege that "(1) she is a protected individual under the FHA, (2) she was engaged in the exercise or enjoyment of her fair housing rights, (3) the defendants coerced, threatened, intimidated, or interfered with the plaintiff **on account of** her protected activity under the FHA, and (4) the defendants **were motivated by an intent to discriminate.**"

Davis v. Fenton, 13 C 3224, 2016 WL 1529899, at *7 (N.D. Ill. Apr. 13, 2016), *aff'd*, 857 F.3d 961 (7th Cir. 2017) (emphasis added) (quoting *Bloch v. Frischholz*, 587 F.3d 771, 783 (7th Cir. 2009)).

For the purposes of this motion to dismiss, Defendant City admits that Plaintiffs have adequately alleged the first two elements listed above. However, nowhere in Plaintiffs' Amended Complaint do they allege that the Defendants took any actions against Plaintiffs because of their protected activity under the FHA. [ECF 26]. Further, nowhere in Plaintiffs' Amended Complaint do they allege facts that would raise the inference that Defendants were motived by an intent to discriminate. *Id.* As such, Count III of Plaintiff's Amended Complaint should be dismissed. *See,*

e.g., Davis, 2016 WL 1529899, at *8 ("Although Plaintiff was only required to plead facts that 'plausibly allege discriminatory intent,' . . . she failed to include any allegations that 'raise[ ] at least a minimal inference that Defendants acted with a discriminatory motive.') (quoting *Sheikh v. Rabin*, 565 Fed. Appx. 512, 518 (7th Cir. 2014); *Stevens v. Hollywood Towers & Condo. Ass'n*, 836 F. Supp. 2d 800, 811 (N.D. Ill. 2011))

CONCLUSION

WHEREFORE, Defendant City respectfully request this honorable Court dismiss Counts II & III of Plaintiffs' Complaint with prejudice and provide any other relief this Court deems appropriate and just.

Dated: August 6, 2021

/s/ Kyle Rockershousen
Kyle Rockershousen, Assistant Corporation Counsel
Joi Kamper, Assistant Corporation Counsel Supervisor
City of Chicago, Department of Law
2 North LaSalle Street, Suite 420
Chicago, Illinois 60602
(312) 744-0742 (Phone)
kyle.rockershousen@cityofchicago.org
Attorneys for the City of Chicago