

# EXHIBIT 1

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

Madeline Mendoza,	)	
	)	
<i>Plaintiff,</i>	)	No. 23-cv-2441
	)	
<i>-vs-</i>	)	<i>(Judge Durkin)</i>
	)	
City of Chicago, et al.	)	
	)	
<i>Defendants.</i>	)	

**PLAINTIFF'S RULE 26(a)(1) DISCLOSURES**

**1. Witnesses:**

Plaintiff Madeline Mendoza, to be contacted through undersigned counsel. Ms. Mendoza has information relevant to the facts underlying her claims.

Marilyn Mulero, to be contacted through counsel in Case Number 23-cv-4795. Ms. Mulero has information relevant to the facts underlying plaintiff's claims.

Jacqueline Montanez, to be contacted through her counsel, Alison Flaum, Northwestern University Pritzker School of Law, 375 East Chicago Avenue, Chicago, Illinois 60611. Ms. Montanez has information relevant to the facts underlying plaintiff's claims.

Yvette (or Ivette) Rodriguez, contact information unknown; Jackie Serrano, contact information unknown; Joan (or Joanne) Roberts, contact

information unknown; Rhonda Riley, contact information unknown. These witnesses are likely to have information relevant to the facts underlying plaintiff's claims, including information about their purported statements to police about plaintiff.

Defendants Reynaldo Guevara, Stephen Gawrys, and Anthony Riccio. The individual defendants are likely to have discoverable information relevant to plaintiff's claims.

Representatives of defendant City of Chicago, to authenticate documents, including police reports and video and audio recordings.

The individuals listed in paragraph 48 of plaintiff's complaint, to be contacted through their counsel. These individuals are likely to have discoverable information relevant to plaintiff's claims that defendants had a pattern of concocted false stories and fabricated evidence.

## **2. Documents**

MMENDOZA 00001-00352	Circuit Court Filings, People v. Mendoza, 92-CR-13088-03
MMENDOZA 00353-00368	Transcript, People v. Mendoza, 92-CR-13088-03, July 11, 2023
MMENDOZA 00369-00513	Record on Appeal, People v. Mendoza, 97-4421
MMENDOZA 00514-02156	Record on Appeal, People v. Mulero, 99-0825
MMENDOZA 02157-03661	Record on Appeal, People v. Mulero, 06-1325
MMENDOZA 03662-04595	Record on Appeal to Supreme Court, People v. Mulero, 76869

MMENDOZA 04596-05298	Record on Appeal to Supreme Court, People v. Mulero, 78932
MMENDOZA 05299-05860	Record on Appeal, People v. Montanez, 93-4519
MMENDOZA 05861-06899	Record on Appeal, People v. Montanez, 99-4343
MMENDOZA 06900-06905	Transcript, People v. Mulero, 92-CR-13088-02, August 9, 2022

Plaintiff may also rely on documents adduced in discovery, including documents produced by defendants, documents produced by the parties in Case Number 23-cv-4795, and documents disclosed in response to third-party subpoenas.

### **3. Damages**

Plaintiff seeks appropriate compensatory and punitive damages from the individual defendants and compensatory damages only from the City of Chicago in amounts to be determined by a jury. Plaintiff also seeks litigation costs and attorney fees.

### **4. Insurance**

Not applicable.

Dated: February 14, 2024

/s/ Joel A. Flaxman  
Joel A. Flaxman  
*an attorney for plaintiff*