

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

<b>MICHAEL L. SHAKMAN, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
v.	)	<b>Case Number: 69 C 2145</b>
	)	<b>Judge Andersen</b>
	)	<b>Magistrate Judge Schenkier</b>
<b>SHERIFF OF COOK COUNTY, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**SIXTH REPORT OF THE *SHAKMAN* COMPLIANCE ADMINISTRATOR  
FOR THE SHERIFF OF COOK COUNTY**

Clifford L. Meacham, *Shakman* Compliance Administrator for the Sheriff of Cook County, by and through his attorney, Peter A. Monahan, submits this Sixth Report pursuant to the Order of the Court entered October 30, 2008, as amended.

**I. Introduction**

As mentioned in the five previous reports, the *Shakman* Compliance Administrator for the Sheriff of Cook County (the “SSCA”)<sup>1</sup> is charged with investigating the Cook County Sheriff’s Office’s (the “Sheriff” and the “Sheriff’s Office”) current employment practices and procedures and assisting in the development of new and transparent employment procedures including a new Employment Plan. For over eighteen months, the SSCA has monitored the Sheriff’s efforts to comply with the October 30, 2008 Supplemental Relief Order (the “SRO”). Since agreeing to the SRO, the Sheriff’s Office has developed and implemented transparent employment procedures for hiring, Promotion, Transfer, Detail, Training and Assignments.<sup>2</sup> In

---

<sup>1</sup> “SSCA” is defined as the *Shakman* Compliance Administrator for the Sheriff of Cook County and/or the *Shakman* Compliance Administrator’s Staff.

<sup>2</sup> Terms defined in the Employment Plan will be used in this Report and capitalized herein accordingly.

addition to working with the SSCA and Class Counsel to create an Employment Plan (the “Plan”), the Sheriff’s Office has also drafted and implemented over 20 different procedures (the “Procedures”) to increase transparency and accountability within the Office. The Sheriff’s Office has hired a Compliance Officer to continue the efforts of the SSCA after the SRO sunsets. In addition to investigating Political Contacts and violations of the Plan and Procedures and ensuring proper implementation of the same, the Compliance Officer is required to train all employees on Unlawful Political Discrimination and Unlawful Political Contacts.

Recently, the Sheriff’s Office restructured its Executive Office to increase oversight of the Departments and accountability of the Department Heads. The new structure includes the creation of three Deputy Chiefs of Staff who will be responsible for certain Departments. In addition to this restructuring, the Sheriff’s Office is in the process of interviewing for a Human Resources Specialist who will work with Personnel to continue the implementation of the Plan and Procedures, continue the implementation of the automated timekeeping function, implement the automated tracking system (Taleo), and assist with updating the Sheriff’s document retention system. These initiatives are proactive steps taken by the Sheriff independent from the SSCA and are viewed as positive developments.

The SSCA and Class Counsel appreciate the commitment and the effort made by the Sheriff and his senior staff. Due to their efforts, significant changes have been made resulting in a more transparent office and positive cultural change. Still, more work remains. Prior to certifying that the Sheriff’s Office is substantially compliant with the requirements of the SRO, the SSCA must be satisfied that progress will continue to be made with respect to: (1) the implementation of the Plan and Procedures; (2) the Office of Professional Review’s (“OPR”) investigations of allegations of Unlawful Political Discrimination and Unlawful Political

Contacts; and (3) the Compliance Officer's investigations of violations of the Plan and Procedures. At this point, the Compliance Officer, and to a less extent OPR, have yet to demonstrate to the SSCA that investigations into alleged violations of the Plan and Procedures and Unlawful Political Discrimination, respectively, are where they need to be for substantial compliance. The SSCA has confidence in the Executive Director of OPR and in the Compliance Officer but substantial compliance requires more examples of thorough investigations, reports, and results. The SSCA also believes the Sheriff's Office, Class Counsel and the taxpaying public will benefit from additional monitoring of the Plan and Procedures. Given the investment in time, effort, and resources, it is more important to get the job done well than to get it over with for the sake of completion. Resources necessary to finish this project, both on the part of the SSCA and the Sheriff, are expected to diminish. Proposed suggestions for the final approach to substantial compliance are set forth in Section VI below.

## **II. Personnel**

In the most recent two reports, the SSCA discussed at length the importance of accurate and complete Organizational Charts (the "Charts") and Job Descriptions for proper implementation of the Plan and Procedures. *See, e.g.*, SSCA's Fifth Report to Court (hereinafter "Fifth Report") at 4-6. While the SSCA has received complete and accurate Charts for all Departments in the Sheriff's Office as of the filing of this report, the delay in producing these Charts led to other delays in Personnel projects necessary for substantial compliance, including providing an updated Exempt List, a proposed Senior Manager/Personal Assistant List and updated Job Descriptions for Exempt, Senior Manager and Personal Assistant positions.

The SSCA previously noted the Sheriff's statement that he anticipated the Organizational Chart project would be completed by May 21, 2010. *See id.* at 5. While the SSCA is pleased

with the efforts put forth by the Sheriff's Office employees who have worked on the Chart project since April, the SSCA notes that the Sheriff's Office did not provide copies of the final Chart (Department of Corrections) until June 2, 2010. This delayed the SSCA's ability to confirm the accuracy of the Charts provided by the Sheriff's Office and, in turn, delayed the review of the same by Class Counsel. This project was concededly complex and enormous in scope; nonetheless, Organizational Charts were necessary and identified as such. *See* SSCA's Fourth Report to Court (hereinafter "Fourth Report") at 11-12. The positive news is that the project is now complete and all Charts were provided to Class Counsel as of June 15, 2010. Given the delays in completion, however, Class Counsel has not had a sufficient opportunity to review this material to determine acceptability. Class Counsel must be accorded sufficient time to digest and comment on these materials; they must not be stamped.

As mentioned in the Fifth Report, the Sheriff's Office demonstrated initiative in deciding to hire a Human Resources Specialist. *See* Fifth Report at 6. Since the SSCA filed the Fifth Report, the SSCA has monitored several interviews of Candidates for this position and expects the Sheriff's Office to make a hiring decision in the next couple of weeks.

The SSCA believes the above projects can be finalized soon but is reticent to impose deadlines on Class Counsel given the delays by the Sheriff's Office. The SSCA will continue working closely with the Sheriff's Office to finalize the above issues and will provide input to Class Counsel so that these outstanding projects can be completed.

### **III. OPR: Claims Adjudication, Unlawful Political Discrimination and Unlawful Political Contacts**

Pursuant to the Plan, OPR is responsible for investigating complaints of Unlawful Political Discrimination and Unlawful Political Contacts. *See* Plan, Art. IV, §§ J.3. & J.4. As mentioned in the SSCA's previous reports, OPR's investigations are essential to maintaining a

culture free from political discrimination. The SSCA must be satisfied that investigations of political discrimination are thorough, complete and procedurally and substantively accurate. At this point, based on the number of reports received, the files reviewed, the investigations of political connections, and the results and recommendations arising from these investigations, there is insufficient material to support a finding of substantial compliance.

To date, the SSCA has received over 20 Complaints alleging Unlawful Political Discrimination.<sup>3</sup> It is the judgment of the SSCA that receipt of this number of claims is a positive sign. At a minimum, it establishes that employees are aware of the role of OPR in investigations of Unlawful Political Discrimination and have some confidence that filing Complaints will not subject them to political retaliation.

Some of these Complaints were referred to the Compliance Officer as being time barred as Post-SRO complaints. To the extent these Complaints raise allegations of procedural deviations, the SSCA agrees they should be referred to the Compliance Officer to determine whether the Complaint is well founded. The SSCA expects that the Compliance Officer will refer any information relating to political discrimination to OPR to complete the investigation.

The SSCA has received nine reports from OPR. Five of the nine reports addressed failure to hire claims. The SSCA has no issue with these determinations or investigations. With respect to three of the remaining Complaints, the SSCA and the Plaintiffs have identified concerns with the investigations. There is little evidence in these files or the reports that OPR investigated the backgrounds, connections or political activities of individuals allegedly favored or the individuals making employment decisions.

OPR is taking steps to address the concerns raised by the SSCA and Class Counsel. The Director of OPR, General Counsel and the Unit C Director of OPR have met with the SSCA and

---

<sup>3</sup> Also, OPR has not received any referrals of Unlawful Political Contacts from the Compliance Officer.

his staff to discuss the SSCA's concerns. The Director also plans to discuss protocols for conducting investigations of Unlawful Political Discrimination with staff from the Office of the Cook County Inspector General. In addition, in response to the SSCA's suggestion, OPR intends to assign Complaints to various other investigators and these investigators plan to meet with SSCA staff to discuss information learned and protocols developed by the SSCA during the pre-SRO claims process.

Moreover, the most recent OPR report received June 15, 2010 by the SSCA addressed issues raised by the SSCA and Class Counsel. The Complaint discussed in that report did not allege political discrimination but rather an unfair process. OPR conducted numerous interviews of the decision makers including questions relating to their political affiliation and activities. OPR conducted a thorough investigation of the Promotion process at issue as well as any deviations from this process. In addition, OPR looked into the political contributions of all promoted individuals as well as the political activity and affiliation of the Claimant. As a result of the investigation, OPR determined that due to human error and not politics, the Promotion process with respect to the Claimant was flawed. The SSCA found this investigation and report to be more thorough and complete than the prior investigations reviewed. The SSCA commends this progress but will need to monitor additional investigations prior to certifying substantial compliance.

#### **IV. Compliance Officer**

In the Fifth Report, the SSCA highlighted the Employment Plan's description of the Compliance Officer's duties.<sup>4</sup> The SSCA had not yet had the opportunity to monitor the

---

<sup>4</sup> These duties include, "taking appropriate steps to eliminate, remedy and report instances of Unlawful Political Contacts and Unlawful Political Discrimination [as well as] receive and investigate complaints of alleged violations

Compliance Officer with regard to any of his explicit duties with the exception of training. *See* Fifth Report at 7. The SSCA stated that, “[o]nce the SRO expires, the Compliance Officer becomes the single most important position charged with ensuring that the Sheriff’s Office remains free from Unlawful Political Discrimination and has the duty to ensure that progress made is not lost.” *Id.* The SSCA further stated that “the Compliance Officer must be able to investigate, audit, and report effectively and autonomously.” Fifth Report at 5. The progress shown to date is not sufficient to support a conclusion that the articulated responsibilities are being discharged and that substantial compliance is warranted.<sup>5</sup>

Since the Compliance Officer was hired, the SSCA and members of his staff have had several meetings with the Compliance Officer to discuss the SSCA’s expectations for the Compliance Officer and what the SSCA believes the requirements of the office are. In those meetings, the SSCA highlighted the need for the Compliance Officer to be an independent authority who carries out the duties described in the Plan. The SSCA continues to stress the need for the Compliance Officer to regularly keep the SSCA apprised of the progress of his investigations, including the content of the Compliance Officer’s reports. The Compliance Officer has not satisfied this concern of the SSCA.

The Plan requires that the Compliance Officer prepare written semi-annual reports including a host of information on the progress of his investigations and other information. *See*

---

of this Employment Plan[,] . . . review OPR investigation reports and append as necessary[,] conduct training [and] audit Employment Plan compliance.” *See* Fifth Report at 7 (quoting Plan, Art. XIII, § A).

<sup>5</sup> One clear sign of progress was the Sheriff’s decision to assign Julie Bisbee (Assistant General Counsel) to work with the Compliance Officer. Ms. Bisbee has proven to be a great asset in investigating alleged violations of the Plan and potential instances of Unlawful Political Discrimination. Unfortunately, as will be shown below, Ms. Bisbee has been considerably more visibly active in these investigations than the Compliance Officer. While the SSCA is pleased that Ms. Bisbee is working with the Compliance Officer, the Plan contemplates that the above-referenced duties will be fulfilled by the Compliance Officer. A staff is undoubtedly necessary to fulfill these duties but that staff can be easily detailed or assigned to another position whereas the Compliance Officer is contractually obligated to fulfill the duties laid out in the Plan. The SSCA must see more output from the Compliance Officer before the SSCA can be comfortable with a finding of substantial compliance.

Plan, Art. XIII, § E. The SSCA and the Sheriff's Office understood that if the Compliance Officer waited three months before filing a report, the chances that the SSCA would be comfortable endorsing a finding of substantial compliance would be remote. Accordingly, the Compliance Officer suggested that he issue weekly reports so the SSCA would have more opportunity to be comfortable with the Compliance Officer's investigations and reports on the same. As noted in the Fifth Report, the Compliance Officer presented his first weekly report on the day the SSCA's Fifth Report was filed. *See* Fifth Report at 8 n. 4. Since then, the SSCA has received three additional reports from the Compliance Officer. Reports issued prior to June 15, 2010 consisted of brief summaries of the Compliance Officer's inquiries. The Compliance Officer must demonstrate the ability to not only conduct an independent investigation into allegations of violations of the Plan and Procedures, but to also articulate the steps taken in the investigation, the result and findings, and, where appropriate, suggested remedial proposals. The reports issued to date have not reached this level.<sup>6</sup>

To illustrate this point, the Compliance Officer, in his June 4<sup>th</sup> Report, provided a brief update on his investigation into the Department of Corrections' External Operations issue that the SSCA discussed in the Fifth Report. *See id.* at 9-10. One problem with this June 4 Report was that it did not refer to the fact that the individual the Sheriff's Office put in charge of investigating the External Operations bid issue (Jeff Flyke, Director of Operations for CCDOC), had issued a report the day before the Compliance Officer's June 4 Report (the "Flyke Report"). The Flyke Report included four pages of detailed analysis of the External Operations Bid issue including a "recommendation [ ] to allow all the officers to remain in their bidded spot, and correct the policy so it doesn't happen again in the future." Importantly, Flyke's Report

---

<sup>6</sup> On June 15, 2010, the SSCA received the Compliance Officer's semi-annual report (hereinafter the "Compliance Officer's Semi-Annual Report"). While this report provided greater detail on a number of in-progress investigations and was therefore an improvement over the weekly reports issued to date, there is room for more progress.

contained detailed accounts of: 1) meetings he had with various individuals in the Sheriff's Office and SSCA; 2) information gathered from interviews with CCDOC Superintendents who were partially responsible for allowing unqualified Correctional Officers to Bid into External Operations; 3) procedural deficiencies that were at fault in the erred Bid; 4) examples of new policies put in place since the Bid to ensure the damage from the Bid was understood and contained; and 5) proposals for long-term procedural changes that would solve the many issues exposed by the Bid.

The Compliance Officer's June 4 Report, unlike Flyke's Report, lacked detail.<sup>7</sup> Flyke cautiously noted that his Report was intended to "serve as an advisory component to Compliance Officer Bob Egan's overall investigation into any findings of *political favor* in relation to this incident." (emphasis added). In a meeting between Director Flyke, the Compliance Officer, Ms. Bisbee, and Matt Pryor from the SSCA, the Compliance Officer stated that he believed he could, at that time, conclude that no political animus was involved in the flawed Bid. While this conclusion might ultimately be correct, it was premature. At the time of that meeting, the Compliance Officer had not conducted a single interview with the unqualified Correctional Officers allowed to Bid into External Operations or any of the Correctional Superintendents who permitted those Officers to so Bid. In short, no inquiry into possible Unlawful Political Discrimination had been made when the Compliance Officer stated his belief that no political discrimination occurred. Moreover, the Compliance Officer's Semi-Annual Report, issued 11 days after the June 4 Report, provided virtually no additional detail on the External Operations investigation. The Compliance Officer did note that he would interview various Department

---

<sup>7</sup> Further, the June 4 Report includes brief summaries on four issues under investigation: three in DOC and one in Women's Justice. The June 4 Report discussed Ms. Bisbee's participation at various meetings where these issues were being investigated. The Compliance Officer did not attend those same meetings. While Ms. Bisbee represented the Compliance Officer favorably at those meetings, the SSCA suggests more active involvement by the Compliance Officer in situations such as these.

Heads to determine whether any political considerations factored into the External Operations Bid. It is unclear why these interviews have not taken place in the seven weeks since the Compliance Officer was informed of the External Operation Bid issue. *See* Fifth Report at 9-10. Additionally, it is unclear why the Compliance Officer has not conducted interviews with the Correctional Superintendents who allowed the External Operations Bid issues to occur nor the Correctional Officers at issue.<sup>8</sup>

The demonstrated independence of the Compliance Officer is a necessity. While the Compliance Officer's office is physically located within the Sheriff's Office, he must consider himself an entity that functions independent of and outside the parameters of the Office of the Sheriff. As noted before, the Compliance Officer must be able to investigate, audit, and report effectively and autonomously in order to fulfill his duties under the Plan. *See* Fifth Report at 8. The SSCA has not yet seen the Compliance Officer demonstrate these abilities effectively.

The SSCA appreciates that the Compliance Officer has only been in office for two months. It took several months for the SSCA to get up to speed and get a working understanding on the many complexities with the employment structure of the Sheriff's Office. The SSCA also understands the need for the Compliance Officer to have sufficient resources to help fulfill his duties under the Plan. The SSCA has, at times, been impressed with the Compliance Officer's prompt handling of problems with the implementation of the Plan and Procedures and with the continuing training effort. While the Compliance Officer has the opportunity to address other issues raised herein, whether sufficient progress can be made by July 30, 2010 is doubtful.

---

<sup>8</sup> The Compliance Officer's weekly reports contain single paragraphs of investigation updates with little detail. While the Semi-Annual Report had a greater amount of detail, the Compliance Officer's reports must continue to expand in content. To the extent an investigation is not complete, a roadmap of future inquiries and proposed short-term and long-term solutions are encouraged and expected in the weekly reports. If that is not possible, the Compliance Officer must still report on progress in the manner described above and as required by the Plan.

## V. Implementation of the Plan and Procedures: Departmental Updates

Since March 5, 2010, the SSCA has regularly updated the Court on the implementation of the Plan and Procedures throughout the various Departments of the Sheriff's Office. The SSCA has taken pains to point out both successes and failures as they occurred. Errors in the implementation of the Plan and Procedures were expected. The Sheriff's Office improved identification of these issues as they arose and worked to swiftly and effectively correct them. The SSCA noted in the Fifth Report that the Sheriff's Office has done a good job of engaging the Compliance Officer to solve problems with the implementation of the Plan and Procedures. See Fifth Report at 11.

In addition to the above-mentioned External Operations Bid, other issues have arisen. These include the failure to check identification prior to the DOC Captain Promotion Writing Sample; requiring half of the DOC Promotion Candidates to provide a Writing Sample on only one scenario while requiring the other half to provide a Writing Sample on two scenarios; and the failure to post a DWJS Bid in compliance with the applicable Collective Bargaining Agreement and the Procedures. The SSCA notified the Sheriff of these errors and the Sheriff's Office, with the assistance of the Compliance Officer, has worked to correct the mistakes. There is room for improvement here; the SSCA encourages the Compliance Officer and senior staff at the Sheriff's Office to discuss ways in which these missteps can be avoided in the future.

To date, the SSCA has not received any update on proposed changes in the Vehicle Services Department or the Department of Community Supervision and Intervention ("DCSI"). The SSCA understands that the newly appointed Deputy Chiefs of Staff responsible for these Departments will meet with SSCA staff assigned to those Departments to discuss any *Shakman*-related concerns the relevant SSCA staff have with those Departments.

Progress has been made in incorporating Procedures for Civilian Transfers and Promotions into the Employment Plan, and in finalizing and posting Procedures applicable to Sworn and Civilian Employees. In addition, the Sheriff's Office has provided the SSCA with Promotion and Transfer Procedures applicable to the Criminal Intelligence Unit ("CIU"), DCSI and OPR. The SSCA expects to provide comments to these Procedures in the near future. The Sheriff's Office continues to revise the Employment Plan to address necessary operational issues and additions based on the Procedures.

## **VI. Substantial Compliance**

In filing this Sixth Report to the Court, the SSCA is mindful that the SRO allows the Sheriff to file a Motion to Dissolve the Sheriff's Consent Decree and SRO on or after July 1, 2010. *See* SRO, Art. III, § D.1. The SSCA also recognizes that the SRO does not require that the Sheriff implement the Plan with perfection in order for substantial compliance to be reached. *See id.* Art. III, § D.4. The SRO does, however, require that the Sheriff's Office no longer have a "policy, custom or practice of making employment decisions based on political factors except for Exempt Positions [and that] the Sheriff has implemented procedures that will effect long-term prevention of the use of impermissible political considerations in connection with employment with the Sheriff." *See id.* Art. III, §§ D.3. & D.5. The SSCA believes the Sheriff's Office has made great progress in its efforts to achieve these and the other requirements laid out in the SRO. While the June 15 Report from OPR reflects the type of reporting expected of that office, the SSCA must see more such reports and investigations from OPR. The other watchdog within the Sheriff's Office, the Compliance Officer has yet to demonstrate that "long-term prevention of the use of impermissible political considerations" is assured. While the SSCA believes that this can,

and likely will, happen the successful implementation and long-term prevention have not yet been demonstrated.

Based on the concerns shared above and throughout the SSCA's previous Reports to the Court, the SSCA was prepared to propose that the parties enter into an order that recognizes the results achieved to date, and allows for a limited time for the Sheriff's Office to continue in its efforts to reach substantial compliance, with a self-executing dismissal should there be no objection filed by the SSCA or Class Counsel. After conferring with both sides, that proposal is withdrawn. Class Counsel is concerned that the proposal shifts the burden of proof, constitutes a renegotiation of a hard fought SRO, and that the optimism inherent in assuming continued progress is not supported by sufficient evidence of timely achievements over past months. The Sheriff is concerned that his efforts may not be fully understood and appreciated, that continued Court supervision, especially in light of Judge Andersen's contemplated retirement, has risks, that the resources devoted to this effort have impaired his ability to achieve internal goals and to finish important projects, and that recent discovery requests seek to reopen inquiry to areas examined by the SSCA.

The overriding concern of the SSCA is that the goal that all share, a well-ordered political office free from political discrimination with measures in place to perpetuate nondiscriminatory conduct, be achieved. Once that goal is met, and it will be, the Sheriff can rightfully claim that he is the first Cook County political officeholder to achieve this result, that in so doing he has set the blueprint and standard for other *Shakman* defendants, and that the long-term benefits of his efforts will save Cook County taxpayers millions of dollars while permitting employees to get a fair shake in hiring, Promotion and other Employment Actions.

This Court has decades invested in *Shakman* litigation. This portion of that litigation is on the threshold of completion. The collective interest in ensuring that the *Shakman* legacy will endure well beyond sunset is a goal that is shared by all. The SSCA has highlighted the Sheriff's progress toward that collective goal in the five previous interim reports to this Court. Each report showed how the universe of issues remaining before substantial compliance narrowed as the Sheriff's Office and SSCA worked together in resolving concerns over the course of this investigation. This Sixth Report to the Court further narrows the universe to a handful of issues. *See supra* Secs. II-V. The SSCA has no intention of allowing resolved issues to resurface. What is left to accomplish is clear and the SSCA expects all parties to focus their energy on the issues described herein so the collective goal of an enduring *Shakman* legacy can be reached, and soon.

The SSCA will continue to provide monthly reports. The SSCA believes that extra time will allow the Compliance Officer and OPR to produce more investigatory reports as well as allow the SSCA to monitor those investigations. In addition, Class Counsel will have the opportunity to monitor progress, to provide information to their client, and to negotiate how to resolve outstanding issues. The SSCA believes that the Compliance Officer and OPR will demonstrate that they are capable of ensuring that a culture of political discrimination and favoritism will not exist in the Sheriff's Office. The SSCA also believes that with more monitoring the issues with the implementation of the Employment Plan and Procedures will subside in both frequency and severity. The Sheriff's Office can benefit from more collaboration with the SSCA and Class Counsel as the parties work through the imperfections of the Plan and Procedures.

The resources and personnel the Sheriff has devoted in his attempt to reach substantial compliance deserve recognition and praise. That effort is unmatched by any other *Shakman*

defendant. The SSCA does not believe that maintaining this level of activity will be necessary during the additional months of monitoring; the SSCA's main concerns focus on the Compliance Officer and, to a lesser extent, OPR. Similarly, the SSCA will be able to scale back his staff considerably over the additional months to focus on those two entities. Substantial compliance will not, however, be a foregone conclusion until the above concerns are addressed, resolved, and there is a comfort level that is not present at this time.

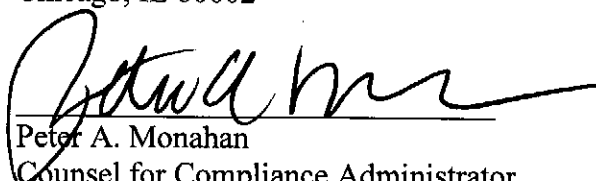
## VII. Conclusion

At this point, the SSCA cannot certify that the Sheriff's Office has substantially complied with the SRO. As mentioned above, it is suggested that the parties consider an order recognizing the progress to date, scaling back the SSCA's activities, and setting a date for status subject to both continued monitoring by the SSCA, production of appropriate material to Class Counsel, and continued progress by the Sheriff. In the meanwhile, the SSCA commits to continue to work with the Sheriff's Office and Class Counsel on this proposal and on the Sheriff's progress in anticipation of a positive conclusion.

Respectfully submitted,



Clifford L. Meacham  
Compliance Administrator  
For the Sheriff of Cook County  
69 West Washington, Suite 840  
Chicago, IL 60602



Peter A. Monahan  
Counsel for Compliance Administrator  
69 West Washington, Suite 840  
Chicago, IL 60602