

The MacArthur Justice Center



LEGAL DIRECTOR AND
CLINICAL ASSOCIATE PROFESSOR
Locke E. Bowman
312.503.0844
l-bowman@law.northwestern.edu

CLINICAL ASSOCIATE PROFESSOR
Joseph Margulies
312.503.0890
j.margulies@law.northwestern.edu

BOARD OF DIRECTORS
Solange MacArthur
John R. MacArthur
James Liggott

GENERAL COUNSEL
David J. Bradford
One IBM Plaza
Suite 4400
Chicago, IL 60611
312.222.9330
djbbradford@jeffner.com

July 31, 2006

Evanston Police Department
150 W. Washington Street
Joliet, Illinois 60432

Re: Freedom of Information Act Request

Dear Sir or Madam:

I am writing to you pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq., on behalf of our client, the National Association of Criminal Defense Lawyers, to request that copies of the documents described in the numbered paragraphs below, be made available for inspection and copying within seven working days of your receipt of this request. Each of the requests relates to Illinois Pilot Program on Sequential Double-Blind Identification Procedures that was conducted pursuant to the requirements of 725 ILCS 5/107A-10 (hereinafter, the "Pilot Program"):

1. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents that describe or reflect the procedures followed by investigating officers in the control group of cases, *i.e.*, those identification procedures that did *not* employ the sequential, double-blind method described in 725 ILCS 5/107A-10(c). In addition to all other relevant information, this request includes any records documenting whether each live lineup was a first viewing of a suspect by an eyewitness, or if the eyewitness had previously identified the suspect in a photo lineup.

2. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents employed to train the police officers who participated in the Pilot Program, and any recordings or records of such trainings.

3. All documents that relate to the retention of Sheri H. Mecklenburg, Dr. Roy S. Malpass and Dr. Ebbe Ebbesen to perform services in connection with the Pilot Program, the analysis of data and the preparation of the Report to the Legislature.

4. Documents sufficient to show the criminal court case numbers for each and every case included in the Pilot Program and the data analysis, all corresponding photographs and recordings of lineups, and all photographs of suspects and fillers shown to an eyewitness during a photo spread or sequential photo array, as required by 725 ILCS 5/107A-5(a).

5. The complete database of information used to generate the data tables in the Report regarding the Pilot Program and the Appendix thereto, as well as any other information contained in the database that was not included in the Report and Appendix.

Thank you for your prompt attention to this request. We will look forward to hearing from you within seven working days of your receipt of this correspondence.

If you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Locke E. Bowman". The signature is written in a cursive style with a long horizontal flourish at the end.

Locke E. Bowman

cc: Scott Ehlers



LEGAL DIRECTOR AND
CLINICAL ASSOCIATE PROFESSOR
Locke E. Bowman
312.503.0844
l-bowman@law.northwestern.edu

CLINICAL ASSOCIATE PROFESSOR
Joseph Margulies
312.503.0890
j-margulies@law.northwestern.edu

BOARD OF DIRECTORS
Solange MacArthur
John R. MacArthur
James Liggett

GENERAL COUNSEL
David J. Bradford
One IBM Plaza
Suite 4400
Chicago, IL 60611
312.222.9350
djbroadford@jenner.com

July 31, 2006

Chicago Police Headquarters
3510 S. Michigan
Chicago, Illinois 60602

Re: Freedom of Information Act Request

Dear Sir or Madam:

I am writing to you pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq., on behalf of our client, the National Association of Criminal Defense Lawyers, to request that copies of the documents described in the numbered paragraphs below, be made available for inspection and copying within seven working days of your receipt of this request. Each of the requests relates to Illinois Pilot Program on Sequential Double-Blind Identification Procedures that was conducted pursuant to the requirements of 725 ILCS 5/107A-10 (hereinafter, the "Pilot Program"):

1. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents that describe or reflect the procedures followed by investigating officers in the control group of cases, *i.e.*, those identification procedures that did *not* employ the sequential, double-blind method described in 725 ILCS 5/107A-10(c). In addition to all other relevant information, this request includes any records documenting whether each live lineup was a first viewing of a suspect by an eyewitness, or if the eyewitness had previously identified the suspect in a photo lineup.

2. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents employed to train the police officers who participated in the Pilot Program, and any recordings or records of such trainings.

Chicago Police Headquarters

July 31, 2006

Page No. 2

3. All documents that relate to the retention of Sheri H. Mecklenburg, Dr. Roy S. Malpass and Dr. Ebbe Ebbesen to perform services in connection with the Pilot Program, the analysis of data and the preparation of the Report to the Legislature.

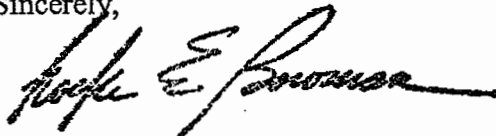
4. Documents sufficient to show the criminal court case numbers for each and every case included in the Pilot Program and the data analysis, all corresponding photographs and recordings of lineups, and all photographs of suspects and fillers shown to an eyewitness during a photo spread or sequential photo array, as required by 725 ILCS 5/107A-5(a).

5. The complete database of information used to generate the data tables in the Report regarding the Pilot Program and the Appendix thereto, as well as any other information contained in the database that was not included in the Report and Appendix.

Thank you for your prompt attention to this request. We will look forward to hearing from you within seven working days of your receipt of this correspondence.

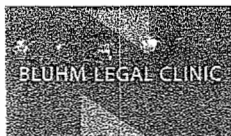
If you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Locke E. Bowman". The signature is written in a cursive style with a long horizontal flourish at the end.

Locke E. Bowman

cc: Scott Ehlers



LEGAL DIRECTOR AND
CLINICAL ASSOCIATE PROFESSOR
Locke E. Bowman
312.503.0844
l-bowman@law.northwestern.edu

CLINICAL ASSOCIATE PROFESSOR
Joseph Margulies
312.503.0890
j-margulies@law.northwestern.edu

BOARD OF DIRECTORS
Solange MacArthur
John R. MacArthur
James Liggett

GENERAL COUNSEL
David J. Bradford
One IBM Plaza
Suite 4400
Chicago, IL 60611
312.222.9350
djbbradford@jeuemer.com

July 31, 2006

Joliet Police Department
150 W. Washington Street
Joliet, Illinois 60432

Re: Freedom of Information Act Request

Dear Sir or Madam:

I am writing to you pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq., on behalf of our client, the National Association of Criminal Defense Lawyers, to request that copies of the documents described in the numbered paragraphs below, be made available for inspection and copying within seven working days of your receipt of this request. Each of the requests relates to Illinois Pilot Program on Sequential Double-Blind Identification Procedures that was conducted pursuant to the requirements of 725 ILCS 5/107A-10 (hereinafter, the "Pilot Program"):

1. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents that describe or reflect the procedures followed by investigating officers in the control group of cases, *i.e.*, those identification procedures that did *not* employ the sequential, double-blind method described in 725 ILCS 5/107A-10(c). In addition to all other relevant information, this request includes any records documenting whether each live lineup was a first viewing of a suspect by an eyewitness, or if the eyewitness had previously identified the suspect in a photo lineup.
2. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents employed to train the police officers who participated in the Pilot Program, and any recordings or records of such trainings.

Joliet Police Department

July 31, 2006

Page No. 2

3. All documents that relate to the retention of Sheri H. Mecklenburg, Dr. Roy S. Malpass and Dr. Ebbe Ebbesen to perform services in connection with the Pilot Program, the analysis of data and the preparation of the Report to the Legislature.

4. Documents sufficient to show the criminal court case numbers for each and every case included in the Pilot Program and the data analysis, all corresponding photographs and recordings of lineups, and all photographs of suspects and fillers shown to an eyewitness during a photo spread or sequential photo array, as required by 725 ILCS 5/107A-5(a).

5. The complete database of information used to generate the data tables in the Report regarding the Pilot Program and the Appendix thereto, as well as any other information contained in the database that was not included in the Report and Appendix.

Thank you for your prompt attention to this request. We will look forward to hearing from you within seven working days of your receipt of this correspondence.

If you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Locke E. Bowman". The signature is written in a cursive style with a long horizontal flourish at the end.

Locke E. Bowman

cc: Scott Ehlers



LEGAL DIRECTOR AND
CLINICAL ASSOCIATE PROFESSOR
Locke E. Bowman
312.503.0844
l-bowman@law.northwestern.edu

CLINICAL ASSOCIATE PROFESSOR
Joseph Margulies
312.503.0890
j-margulies@law.northwestern.edu

BOARD OF DIRECTORS
Solange MacArthur
John R. MacArthur
James Liggett

GENERAL COUNSEL
David J. Bradford
One IBM Plaza
Suite 4400
Chicago, IL 60611
312.222.9350
djbbradford@jcenter.com

July 31, 2006

Bridget DePriest
Illinois State Police
Freedom of Information Officer
500 Iles Park Place, Suite 300
Chicago, Illinois 62703

Re: Freedom of Information Act Request

Dear Madam:

I am writing to you pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq., on behalf of our client, the National Association of Criminal Defense Lawyers, to request that copies of the documents described in the numbered paragraphs below, be made available for inspection and copying within seven working days of your receipt of this request. Each of the requests relates to Illinois Pilot Program on Sequential Double-Blind Identification Procedures that was conducted pursuant to the requirements of 725 ILCS 5/107A-10 (hereinafter, the "Pilot Program"):

1. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents that describe or reflect the procedures followed by investigating officers in the control group of cases, *i.e.*, those identification procedures that did *not* employ the sequential, double-blind method described in 725 ILCS 5/107A-10(c). In addition to all other relevant information, this request includes any records documenting whether each live lineup was a first viewing of a suspect by an eyewitness, or if the eyewitness had previously identified the suspect in a photo lineup.

2. With respect to each of the three participating jurisdictions (Chicago, Joliet and Evanston), all documents employed to train the police officers who participated in the Pilot Program, and any recordings or records of such trainings.

Bridget DePriest

July 31, 2006

Page No. 2

3. All documents that relate to the retention of Sheri H. Mecklenburg, Dr. Roy S. Malpass and Dr. Ebbe Ebbesen to perform services in connection with the Pilot Program, the analysis of data and the preparation of the Report to the Legislature.

4. Documents sufficient to show the criminal court case numbers for each and every case included in the Pilot Program and the data analysis, all corresponding photographs and recordings of lineups, and all photographs of suspects and fillers shown to an eyewitness during a photo spread or sequential photo array, as required by 725 ILCS 5/107A-5(a).

5. The complete database of information used to generate the data tables in the Report regarding the Pilot Program and the Appendix thereto, as well as any other information contained in the database that was not included in the Report and Appendix.

Thank you for your prompt attention to this request. We will look forward to hearing from you within seven working days of your receipt of this correspondence.

If you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Locke E. Bowman". The signature is written in a cursive style with a long horizontal flourish at the end.

Locke E. Bowman

cc: Scott Ehlers