

# PEOPLE'S LAW OFFICE

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May 5, 2014

Sergeant Sean Rice  
CPD Internal Affairs Division  
3510 S. Michigan Avenue  
Chicago, IL 60653

Re: C.L. No. 1068619

HAND DELIVERY

Dear Sergeant Rice:

Thank you for your letter and follow-up phone call concerning the lawsuit our client, Nanci Koschman, recently filed against the City of Chicago and numerous former and present Chicago police officers and command officials. It is our understanding that you wish to take a statement from Ms. Koschman before you question the accused CPD officers.

After giving considerable thought to your request, we have concluded that we cannot participate or allow Ms. Koschman to do so. First, it is obvious to us that the CPD, and particularly its Internal Affairs Division, has a conflict of interest when it comes to investigating the allegations made in Ms. Koschman's complaint. Among other things, the complaint alleges that the Internal Affairs Division first failed to investigate for seven years, and then conducted a sham investigation into the mishandling of an official police file. Paragraphs 128 and 129 of the complaint allege:

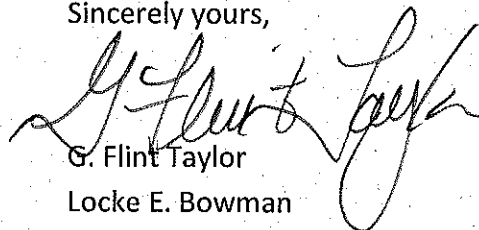
IAD Sergeant, defendant Richard Downs, conducted the IAD "found file" investigation. This "investigation" was not designed to determine how the missing file had been "found," however. Rather, it was done to create the appearance that an investigation had been conducted. Downs's entire inquiry consisted of a ten minute interview of [Lt. Richard] Walsh, who did not fully cooperate and withheld the purported fact that defendant [Sgt. Thomas] Flaherty was present when he claimed to have discovered the homicide file. The day after Walsh's interview, Downs entered a finding of "not sustained." The CPD did not conduct any further investigation of the missing and altered files.

Additionally, the IAD's inaction for many years gives us absolutely no confidence that the present proposed investigation—initiated only *after* the *Sun-Times* exposed this scandal; *after* a Special Prosecutor charged Mr. Vanecko and roundly condemned the CPD for its investigation and cover-up; *after* the City's Office of Inspector General began an investigation; and *after* we initiated suit—will be independent and vigorous or that it will lead to appropriate discipline for all the officers, including Sgt. Downs, who are implicated in this decade-long police cover-up.

Our lack of confidence is heightened by your inexplicable insistence on the precondition that Ms. Koschman, who has been victimized by this cover-up for ten long years, provide a statement. Ms. Koschman was not a witness to any of the particulars of police misconduct alleged in the complaint, as you certainly know.

For all these reasons, we respectfully decline to produce Ms. Koschman for an interview at this time.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "G. Flint Taylor".

G. Flint Taylor  
Locke E. Bowman

Cc: Nanci Koschman