

FILED DATE: 2/19/2021 9:59 PM 2021L001939

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION**

FILED
2/19/2021 9:59 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L001939

ANJANETTE YOUNG,)
)
Plaintiff,)
)
-vs-)
)

12284856

THE CITY OF CHICAGO; CHICAGO POLICE)
OFFICERS ALAIN APORONGAO, STAR NO.)
4870; ALEX WOLINSKI, STAR NO. 2605;)
BRYAN MORDAN, STAR NO. 11437;)
GABRIEL CRUZ, STAR NO. 2844;)
MICHAEL ORTA, STAR NO. 11485;)
JOSEPH LISCIANDRELLO; STAR NO. 19362;)
MICHAEL DONNELLY, STAR NO. 13784;)
TITO JIMENEZ; STAR NO. 14955;)
FILIP BIENIASZ, STAR NO. 15454;)
NIKOLA SARIC, STAR NO. 18200;)
CODY MALONEY, STAR NO. 13032;)
AND ERIC ACEVEDO, STAR NO. 13560,)
)
Defendants.)

Case No.: 2021L001939

Jury Trial Demanded

COMPLAINT AT LAW

NOW COMES Plaintiff ANJANETTE YOUNG (“Plaintiff”) by and through her attorney Keenan J. Saulter of Saulter Law P.C., and for her Complaint at Law against Defendants THE CITY OF CHICAGO, and CHICAGO POLICE OFFICERS ALAIN APORONGAO, STAR NO. 4870; ALEX WOLINSKI, STAR NO. 2605; BRYAN MORDAN, STAR NO. 11437; GABRIEL CRUZ, STAR NO. 2844; MICHAEL ORTA, STAR NO. 11485; JOSEPH LISCIANDRELLO; STAR NO. 19362; MICHAEL DONNELLY, STAR NO. 13784; TITO JIMENEZ; STAR NO. 14955; FILIP BIENIASZ, STAR NO. 15454; NIKOLA SARIC, STAR NO. 18200;

CODY MALONEY, STAR NO. 13032; and ERIC ACEVEDO, STAR NO. 13560, states as follows:

NATURE OF ACTION

1. This cause arises out of the February 21, 2019 execution of a search warrant on Ms. Anjanette Young’s home by Chicago Police Department (“CPD”) officers that was based solely on an anonymous informant.

2. The officers obtained the search warrant at approximately 12:00 p.m. on February 21, 2019.¹

3. While executing the warrant, CPD officers forced Ms. Young to stand either completely or partially naked and handcuffed for approximately 40 minutes in the presence of twelve male (non-African American) officers.

4. Even though Ms. Young explained more than 43 times that the officers had to be in the wrong house, it wasn’t until they had been there in her presence naked for approximately 40 minutes—and after they intentionally turned off their body worn cameras for an off-camera discussion—did they finally ask Ms. Young for her name and admit to her that they knew they were at the wrong home.

5. This off-camera discussion was had at the insistence of the lead officer on the scene Sgt. ALEX WOLINSKI, STAR NO. 2605.

6. SGT. WOLINSKI can be seen and heard improperly directing officers under his command to turn their body cameras off for the purpose of discussing

¹ See Search Warrant Application and Warrant attached hereto and incorporated by reference as Exhibit “A”.

whether the officers were in the wrong home, as Ms. Young had repeatedly advised them that they were.

7. This incident occurred at 164 N. Hermitage Avenue, Chicago, Cook County, Illinois 60612.

8. Shockingly, the individual that this raid team was looking for, was in fact right next door to Ms. Young’s unit during this horrific and inhumane experience.

9. Had Officer ALAIN APORONGAO, STAR NO. 4870 who obtained the search warrant from an alleged confidential information and his supervisor Sgt. SGT. WOLINSKI done the most basic amount of “police work” i.e. using Google—they could have easily found the individual they were looking for, Andy Simpson.²



² A copy of the police reports relating to Simpson are attached hereto and incorporated by reference as Exhibit “B”.

10. As a result of this incident, Plaintiff ANJANETTE YOUNG, was emotionally scarred and traumatized due to Chicago Police Officers unlawfully raided her home.

11. Young continues to suffer from mental and emotional anguish as a result of the reckless conduct of the Defendant and these officers.

PARTIES

A. Plaintiff

12. Plaintiff ANJANETTE YOUNG was a resident of the Cook County, Illinois at the time of the incident (and remains a resident here as of the filing of this action).

B. Defendants

13. Defendant THE CITY OF CHICAGO, is a Municipal Corporation, organization pursuant to the laws of the State of Illinois.

14. Defendant Chicago Police Officers ALAIN APORONGAO, STAR NO. 4870; ALEX WOLINSKI, STAR NO. 2605; BRYAN MORDAN, STAR NO. 11437; GABRIEL CRUZ, STAR NO. 2844; MICHAEL ORTA, STAR NO. 11485; JOSEPH LISCIANDRELLO; STAR NO. 19362; MICHAEL DONNELLY, STAR NO. 13784; TITO JIMENEZ; STAR NO. 14955; FILIP BIENIASZ, STAR NO. 15454; NIKOLA SARIC, STAR NO. 18200; CODY MALONEY, STAR NO. 13032; ERIC ACEVEDO, STAR NO. 13560; OFFICER FRENCH, STAR NO. 15013; OFFICER VILLA, STAR NO. 14319 are employees of the Chicago Police Department (hereinafter referred to as “Defendant Chicago Police Officers”). Each of the Defendant Chicago Police

Officers referenced herein was working as employees and agents, under the color of law at all times complained of in this First Amended Complaint.

JURISDICTION

15. This court has jurisdiction over this lawsuit because the action arises under state law.

VENUE

16. Venue is proper in the Circuit Court of Cook County, Illinois because a substantial part of the events or omissions giving rise to this claim occurred in this county.

VICARIOUS LIABILITY

17. Illinois law, 745 ILCS 10/9-102, directs public entities to pay any common law tort judgment for compensatory damages for which employees are held liable within the scope of their employment activities.

18. In committing the acts alleged above, Defendant Chicago Police Officers were at all times members and agents of CPD and THE CITY OF CHICAGO, this means that the defendant's agents, officers, servants, borrowed servants, employees or representatives did such act or thing and that the time such act or thing was done, it was done with the full authorization or ratification of defendant or was done in the normal and routine course and scope of employment of defendant's officers, agents, servants, borrowed servants, employees or representatives.

19. The principal is vicariously liable for the acts of the agent because of an employer employee status, agency by estoppel, ostensible agency or borrowed servant doctrine.

RESPONDENT SUPERIOR

20. In committing the acts and omissions alleged herein, the Defendant Chicago Police Officers were at all times members and agents of the Chicago Police Department and the Defendant THE CITY OF CHICAGO and were acting within the scope of their employment.

21. The Defendant CITY OF CHICAGO is, therefore, liable as principal for all common law torts by its agents within the scope of their employment.

FACTS COMMON TO ALL COUNTS

22. On February 21, 2019, Plaintiff ANJANETTE YOUNG resided at her home located at 164 N. Hermitage Avenue, Chicago, Illinois 60612.

23. On February 21, 2019, at approximately 7:00 p.m., Plaintiff ANJANETTE YOUNG (hereinafter referred to as “Plaintiff”) was in her bedroom, in the process of preparing for bed when she heard a knock at her front door.

24. Even though the Defendant officers were required to do so, they did not provide Ms. Young with a “reasonable amount of time” to respond to their slight knock at her door—and while they were in the process of nearly knocking her door off of its hinges with a large metal battering ram, they encountered Ms. Young—completely naked in front of twelve men, pointing guns at her.

25. Plaintiff was attempting to find clothing and was completely naked when Defendant Chicago Police Officers burst in her home without authorization.

26. Plaintiff tried to quickly grab a jacket to cover herself but was ordered by Defendant Chicago Police Officers to put her hands up while they pointed guns at her.

27. See <https://youtu.be/2BdjK-KlxU> last visited on Feb. 19, 2021.



28. At this point, Defendant Officer JOSEPH LISCIANDRELLO Star No. 19362—points his assault rifle at Ms. Young and tells her to “let me see your fucking hands!!!”³

29. This was the first time in her entire life that Ms. Young had been threatened with a weapon pointed at her.

³ See LISCIANDRELLO Body Worn Camera x81126433 at T00:56:48.

30. Simply put, she thought at that moment and for the nearly the entirety of the next hour that she was going to die in a hail of gunfire at the hands of individuals who “allegedly” were sworn to serve and protect her.

31. At the time of all relevant events, Plaintiff repeatedly asked the Defendant Chicago Police Officers why they had burst into her home.

32. She pleaded with them and begged them to tell her who they were looking for and repeatedly told them they had the wrong house.

33. Plaintiff repeatedly reiterated that she lived alone.

34. Plaintiff was put in handcuffs while completely naked by the Defendant Chicago Police Officers, all of whom were male.

35. Plaintiff repeatedly asked if she could put clothing on but was ignored by the Defendant Chicago Police Officers.

36. Plaintiff repeatedly asked to see the search warrant but was told by Defendant Chicago Police Officer ALEX J. WOLINKSI that she could see it “*in a minute*” and was ordered to “*calm down*” even though the Defendant Chicago Police Officers had burst into her home without authorization, forced her to stand completely naked before them, and while they threatened her life with their service weapons.

37. Plaintiff was hysterical and crying because she feared for her life.

38. Prior to this incident, Plaintiff had never had a gun pointed at her in her entire life.

39. This was without a doubt, the most emotionally scarring and life-threatening torture that Ms. Young had ever experienced in her nearly 48 years of life through the date of this incident.

40. Plaintiff was violated, demoralized and disrespected as Defendant Chicago Police Officers continued to search her home and throw her personal belongings around as she stood there naked and handcuffed.

41. Plaintiff asked several times if she could put clothing on since she was still handcuffed and completely naked in front of a room full of strange men.

42. Eventually, after approximately forty-five minutes, a female Chicago Police Officer was called to the scene and assisted Plaintiff.

43. The unknown female Chicago Police Officer walked Plaintiff into her bedroom and removed the handcuffs. The female Chicago Police Officer then turned off her bodycam so Plaintiff could get dressed.

44. Once Plaintiff was dressed, she was again placed back into handcuffs.

45. Plaintiff asked Defendant Chicago Police Officer ALEX J. WOLINKSI, what they were looking for and he explained they are looking for an individual and they needed to identify whether anything in her home belonged to him. This was after the Defendant Police Officers had been in her home for nearly an hour.

46. At that point, Defendant Chicago Police Officer ALEX J. WOLINKSI finally showed Plaintiff the Search Warrant and informed her “they had good intel about the suspect being there”.

47. Plaintiff was made to wait nearly an hour after the Defendant Chicago Police Officers burst into her home to show her the Search Warrant.

48. During this time, Plaintiff had repeatedly explained that she has lived in the same residence, alone, for the last four years.

Horribly Shoddy Police Work

49. Defendant Chicago Police Officer ALAIN APORONGAO was assigned to the search team. He was the affiant of the Complaint for Search Warrant that was presented to the Judge.

50. When Defendant Chicago Police Officers executed the search warrant at 164 N. Hermitage Avenue, in Chicago, Illinois, on February 21, 2019, they were at all times acting under color of law and within the scope of their employment as officers of the Chicago Police Department (“CPD”) for the City of Chicago.

51. At approximately 10:00 a.m. on February 21, 2019, Defendant Chicago Police Officer APORONGAO swore out and obtained a search warrant authorizing a search of “Andy L. Simpson” and the premises at “164 N. Hermitage Ave., 1st Floor Apartment, Chicago, Cook County, Illinois.”

52. The warrant also authorized the seizure of a black semi-automatic handgun, ammunition, any articles or documents establishing residency, any locked containers and any other illegal contraband.

53. The complaint for the search warrant inaccurately stated, based on information from a J. Doe confidential informant, that Mr. Simpson resided in the 1st Floor Apartment at 164 N. Hermitage Avenue.

54. In fact, on February 21, 2019, Mr. Simpson did not reside at 164 N. Hermitage Avenue and had not lived there for several years.

55. The Plaintiff has occupied that residence for the last four years prior to the incident.

56. Mr. Simpson had no connection to 164 N. Hermitage Avenue for several years. He does not receive mail or store belongings there. He does not have a key. Plaintiff does not know who this person is.

57. The Defendant Chicago Police Officers used the address given to them by the J. Doe informant, without properly verifying this address through other sources.

58. The facts that a Chicago police officer alleges in a complaint for a search warrant are required to be “credible and reliable.” (CPD SO4-19, VI.B.a.).

59. To this end, a Chicago police officer swearing out a search warrant under oath before a judge is required to “thoroughly conduct the investigation leading up to the need for a search warrant.” (CPD SO4-19).

60. Crucially, the affiant of a complaint for search warrant is required to independently investigate and verify the information provided by a John or Jane Doe confidential informant, including information about where the intended target resided.

61. In other words, as the sworn applicant for the warrant, Defendant Chicago Police Officer APORONGAO had a duty to discover, diligently and in good faith, and disclose to the issuing warrant judge whether he had identified the correct apartment or place to be searched and not the residence of an innocent third party.

62. In direct violation of CPD policy, the Defendant Chicago Police Officers involved in obtaining or approving the search warrant for 164 N. Hermitage Avenue performed no independent investigation or surveillance to verify that the “J. Doe” confidential informant had provided current or accurate information regarding where Mr. Simpson resided or could be found.

63. The Defendant Chicago Police Officers could have made a number of simple inquiries, they had multiple sources of information available to them.

64. They could have contacted the building’s owner. They could have contacted a utility company supplying energy to the building. They could have utilized CPD’s database, Accurint, which assists officers in identifying persons residing at a given address. They could have run a person search on LexisNexis, using Mr. Simpson’s date of birth and last known address.

65. However, the Defendant Chicago Police Officers failed to conduct any investigation or verification, as required by SO4-19. They simply trusted what the “J. Doe” told them about where Simpson lived.

66. Consequently, in his complaint for search warrant, Defendant Chicago Police Officer APORONGAO provided the court with an incorrect or obsolete address, 164 N. Hermitage Avenue.

67. The Defendant Chicago Police Officers did not have probable cause to believe that Simpson lived at the Plaintiff’s house and, therefore, to enter and conduct a search at that address.

68. The Defendant Chicago Police Officers failed in their duty to independently investigate and verify the particular place to be searched, theirs was not a good faith error.

69. Similarly, Defendant Chicago Police Officer WOLINSKI simply gave rubberstamp approval to APORONGAO'S application for the search warrant, without taking any steps to ensure that APORONGAO and other Defendant Chicago Police Officers had performed their due diligence required by CPD Special Order SO4-19.

70. Taking such vital steps was something he was required to do.

71. On February 21, 2019, Defendant Chicago Police Officers reasonably knew or should have known that the intended target of warrant did not reside at 164 N. Hermitage Avenue.

72. Eventually, a female Chicago Police Officer was called to the scene and took Plaintiff into her bedroom and removed the handcuffs. The female Chicago Police Officer turned off her bodycam so Plaintiff can get dressed.

73. Once Plaintiff was dressed, the handcuffs were placed back on her.

74. The Defendant Chicago Police Officers were still walking around and ransacking her home. Plaintiff asked Defendant Chicago Police Officer WOLINSKI who they are looking for and told her they were looking for a person and need to identify if anything belonged to him.

75. Defendant Chicago Police Officer WOLINSKI then (finally) showed Plaintiff the search warrant. He informs her they had "good" intel about the suspect being here.

76. Plaintiff tells them well obviously it is “bad” intel since I have been living here, alone, for the last several years and does not know anyone by the name of Andy L. Simpson.

77. Eventually, Defendant Chicago Police Officer WOLINSKI removed the handcuffs from Plaintiff and apologized to her but reiterated that they had “good” intel.

**Beginning of the Conspiracy and Coverup between
the Chicago Police Department, COPA and the Mayor’s Office**

78. At approximately 35 minutes into this tortuous encounter, Defendant Chicago Police Officers Sgt. WOLINSKI and the Affiant APORONGAO determine that perhaps Ms. Young is telling the truth, that their investigation was horrible and that they are in fact in the wrong house.

79. Instead of immediately apologizing to Ms. Young, they instead begin to violate Chicago Police Department policy relating to the

80. It is at this point that Sgt. WOLINSKI and the Affiant APORONGAO decide to step outside (with two of their brother officers)—and critically purposely make the decision to disconnect their Body Worn Cameras in violation of the Chicago Police Department Special Order S03-14 Body Worn Cameras, Issued on April 20, 2018 with an Effective Date of April 30, 2018. ⁴

⁴ I. POLICY

A. The Department is committed to protecting the safety and welfare of the public as well as its members. Audio and visual recordings from the body-worn camera (BWC) can improve the quality and reliability of investigations and increase transparency. Members will be trained prior to the assignment and utilization of the BWC. If a member assigned a BWC is in a vehicle equipped with an in-car video system, the member will follow both the In-Car Video Systems directive and this directive. Any member who knowingly fails to comply with this directive will be subject to progressive discipline,

training, or other remedial action according to current Department policies. The definitions of various terms used in this directive are in Section XII.

B. The Department does not intend to utilize the BWC to discipline members for isolated minor Departmental rule infractions consistent with the Illinois Officer-Worn Body Camera Act (50 ILCS 706/10) and the Department directive titled Complaint and Disciplinary Procedures.

C. All sworn members and their immediate supervisors assigned to a Bureau of Patrol district normally assigned to field duties and any other member at the discretion of the district commander will be assigned and utilize a BWC.

D. Members will only use department-issued BWCs.

E. Members will only use Department BWCs while on duty in accordance with this directive.

II. INITIATING, CONCLUDING, AND JUSTIFYING RECORDINGS

A. Initiation of a Recording

1. The decision to electronically record a law-enforcement-related encounter is mandatory, not discretionary, except where specifically indicated.

2. The Department member will activate the system to event mode at the beginning of an incident and will record the entire incident for all law-enforcement-related activities. If circumstances prevent activating the BWC at the beginning of an incident, the member will activate the BWC as soon as practical. Law-enforcement-related activities include but are not limited to:

- a. calls for service;
- b. investigatory stops;
- c. traffic stops;
- d. traffic control;
- e. foot and vehicle pursuits;
- f. arrests;
- g. use of force incidents;
- h. seizure of evidence;
- i. interrogations;
- j. searches, including searches of people, items, vehicles, buildings, and places;
- k. statements made by individuals in the course of an investigation;
- l. requests for consent to search;
- m. emergency driving situations;
- n. emergency vehicle responses where fleeing suspects or vehicles may be captured on video leaving the crime scene;
- o. high-risk situations;
- p. any encounter with the public that becomes adversarial after the initial contact;
- q. arrestee transports;
- r. any other instance when enforcing the law.

B. Deactivation of a Recording

1. The Department member will not deactivate event mode unless:

a. the entire incident has been recorded and the member is no longer engaged in a law-enforcement-related activity;

For the purposes of the deactivation of BWCs, the Department has identified the following circumstances as the conclusion of a law-enforcement-related activity:

(1) the member has cleared the assignment;
 (2) the member leaves the scene of the incident;
 (3) for arrestee transports, when the arrestee:

(a) is secured in the processing room and the member is only conducting administrative functions of the Department alone or only in the presence of other sworn members; or

(b) custody has been transferred to another Department member, lock-up personnel, mental health providers, or hospital personnel.

(4) the highest-ranking on-scene Bureau of Patrol supervisor has determined that the scene is secured in circumstances involving an officer-involved death investigation, firearm discharge, or any other use of force incident.

NOTE: The scene may be considered secure when all offenders are in custody or otherwise not in the area, medical aid has been requested/administered or CFD is on the scene, the involved officers have been identified, and the crime scene has been established.

b. requested by a victim of a crime;

c. requested by a witness of a crime or a community member who wishes to report a crime; or

d. the officer is interacting with a confidential informant.

EXCEPTION: Department members may continue or resume recording a victim or witness if exigent circumstances exist or if the officer has reasonable articulable suspicion that a victim, witness, or confidential informant has committed or is in the process of committing a crime.

2. Department members will ensure their BWC is deactivated, consistent with this directive, before providing an oral response to the public safety investigations for incidents involving a firearms discharge and/or officer-involved death.

3. The Department member will ensure that any request by a victim or witness to deactivate the camera, unless impractical or impossible, is made on the recording.

4. Justification for Deactivating a Recording

The Department member will verbally justify on the BWC when deactivating it prior to the conclusion of an incident. When a member fails to record an incident or circumstances warrant the verbal justification of a deactivation as being impractical or impossible, the

81. This decision to hatch a conspiracy and to continue to violate Ms. Young's rights can be seen on the officer's body worn cameras. Defendant Chicago Police Officer APORONGAO'S Body Worn Camera at time stamp 2019-02-22 T01:14:0Z AXON BODY 2 X81309100. *See* <https://chicagopolicepublic.blob.core.usgovcloudapi.net/bwc-19sw5247-2020feb21/index.html> last visited on February 19, 2021.

82. Sadly, the conspiracy didn't end on the night of this wrongful invasion into the sanctity of Ms. Young's home.

83. Instead, the following City of Chicago Agencies including the Office of Mayor Lori E. Lightfoot, the Chicago Police Department ("CPD") and the Chicago Office of Police Accountability ("COPA"), the City of Chicago Department of Law and city employees (at the highest levels) became involved in the conspiracy to cover-up these grotesque human rights violations that occurred at Ms. Young's Home on February 22, 2019:

- Mayor Lori E. Lightfoot;
- Patrick Mullane, Deputy Press Secretary Office of Mayor Lori E. Lightfoot;
- Anthony Guglielmi, Chief Communications Officer, CPD;
- Susan Lee, Deputy Mayor for Public Safety;
- Tamika Puckett, Chief Risk Officer;
- Michael Crowley, Communications Director Office of Mayor Lori E. Lightfoot;
- Anjali Julka FOIA Officer - Office of Mayor Lori E. Lightfoot;

member will document the reason by activating the BWC and stating the type of incident, event number, and the reason for deactivating the recording.

- Lauren Huffman, Deputy Communications Director Office of Mayor Lori E. Lightfoot;
- Anel Ruiz, Press Secretary Office of Mayor Lori E. Lightfoot;
- Bill McCaffrey, City of Chicago Department of Law Spokesperson;
- Michele D. Morris, Director of Risk Management CPD;
- Natalia M. Delgado, Law Department;
- Maurice Claussen, Chief of Staff, Office of Mayor Lori E. Lightfoot;
- Mike Milstein Deputy Director of Community Policing, CPD;
- Dana O'Malley General Counsel, Chicago Police Department;
- Steve Jarosz, Star No.: 1482; FOIA Officer, CPD;
- Vaughn Ganiyu Associate Staff Attorney, CPD; and
- Pedro Rodriguez; FOIA Office, CPD.

84. This raid was brought to the attention of Chicago Mayor Lori E. Lightfoot on November 11, 2019—she was advised: “Mayor, please see below for a pretty bad wrongful raid coming out tomorrow. Media FOIA was denied and victim *[Plaintiff Anjanette Young]* request was in the works and to be released to her tomorrow within the deadline period.”⁵

85. Sadly, after this horrific situation was brought to Mayor Lightfoot’s attention, and after she demanded an immediate meeting regarding this situation, Ms. Young’s FOIA Request for Body Worn Camera Footage of her own naked body and the interior of her home was denied to her.⁶

⁵ See <https://blockclubchicago.org/2020/12/31/chicagos-police-watchdog-blocked-anjanette-young-from-getting-video-of-wrongful-raid-emails-show/>. Last visited on Feb. 19, 2021.

⁶ *Id.*

86. The City has now (finally after nearly two years) acknowledged that it never should've denied Ms. Young's valid FOIA request.⁷

87. Further, Mayor Lightfoot has repeatedly acknowledged that this horrific violation of Ms. Young's Constitutional and Human Rights never should've occurred—even though when she was initially asked about the raid—Mayor Lightfoot apparently forgot that she first learned of the situation on November 11, 2019.⁸

88. The continued instance that Ms. Young be denied access to the Body Worn Camera videos of her naked body and the inside of her home has served to further traumatize Ms. Young.

COUNT I
FALSE IMPRISONMENT

89. Plaintiff realleges paragraphs 1 through 88 above and incorporate them into this count. Plaintiff asserts her claim against Defendant Chicago Police Officers who entered and searched 164 N. Hermitage Avenue, 1st Floor Apartment.

90. The manner in which Defendant Police Officers conducted their entry into and search of Plaintiff's apartment were objectively unreasonable, in violation of her rights.

91. For example, when these Defendant Chicago Police Officers entered Plaintiff's home, they did not knock or announce themselves or their office in circumstances where it was required, they kicked down Plaintiff's door and barged in, they handcuffed Plaintiff while she was naked and refused to let her put clothes

⁷ *Id.*

⁸ *Id.*

on to cover herself, and they intentionally damaged or destroyed Plaintiff's personal property.

92. Further, it was unreasonable for Defendant Chicago Police Officers to selectively handcuff Plaintiff, who did not pose a threat and who did not in any way resemble the target described in the search warrant.

93. Defendant Chicago Police Officers' manner of entry and search was objectively unreasonable in these and other ways and was undertaken intentionally, with malice and reckless indifference to Plaintiff's constitutional rights.

94. Under the circumstances, Defendant Chicago Police Officers had reasonable alternative law enforcement techniques available to them for effective entry and search.

95. As the direct and proximate result of the Defendant Chicago Police Officers' misconduct, Plaintiff suffered and continues to suffer injury and harm.

96. Defendant Chicago Police Officers' conduct under this count merits an award of punitive damages to Plaintiff. Defendant Chicago Police Officers' shocking inaction in failing to perform required and basic reasonable due diligence to verify the correct location for a search warrant before raiding and searching citizens' residence constituted an abuse of power and authority. Defendant Chicago Police Officers' actions – of relying solely on location information provided by a J. Doe confidential informant – were directed towards an honest, hard-working citizen who was totally innocent of all criminal conduct.

97. Defendant Chicago Police Officers' conduct toward Plaintiff was undertaken with willful and wanton disregard for the rights of others. Defendant

Chicago Police Officers acted with actual intention or with a conscious disregard or indifference for the consequences when the known safety and health of Plaintiff was involved. Defendant Chicago Police Officers acted with actual malice, with deliberate violence, willfully or with such gross negligence as to indicate a wanton disregard for the rights of others.

98. In light of the character of Defendant Chicago Police Officers' actions toward Plaintiff and the lasting or permanent psychological injury that Defendants' conduct has caused Plaintiff, Defendants' conduct merits an award of punitive damages.

COUNT II
FALSE ARREST

99. Plaintiff re-alleges paragraphs 1 through 98 above and incorporates them into this count. Plaintiff asserts her claim against Defendant Chicago Police officers who entered and/or searched 164 N. Hermitage Avenue, 1st Floor Apartment.

100. The actions of Defendant Chicago Police Officers set forth above, including pointing a gun at close range, created reasonable apprehension in Plaintiff of immediate harmful contact to Plaintiff's person.

101. The Defendant Chicago Police Officers intended to bring about apprehension of immediate harmful contact in Plaintiff or knew that their actions would bring about such apprehension.

102. In the alternative, the conduct of Defendant Chicago Police Officers was willful and wanton and constituted a course of action which shows an actual or

deliberate intention to cause harm or which, if not intentional, shows an utter indifference to or conscious disregard for the safety of others and/or their property.

103. The conduct of Defendant Chicago Police Officer's in entering and executing a residential search warrant are generally associated with a risk of serious injuries. Numerous prior injuries have occurred to civilians in this context. Defendant Chicago Police Officers failed to take reasonable precautions after having knowledge of impending danger to Plaintiff.

104. The Defendant Chicago Police Officers' actions were the direct and proximate cause of Plaintiff's apprehension.

105. Plaintiff has been seriously harmed by Defendant Chicago Police Officers' actions.

COUNT III
ASSAULT

106. Plaintiff re-alleges paragraphs 1 through 105 and incorporates them into this count. Plaintiff asserts her claim against the Defendant Chicago Police Officers who entered and/or searched 164 N. Hermitage Avenue, 1st Floor Apartment.

107. The actions, omissions and conduct of Defendant Chicago Police Officers set forth above were extreme and outrageous and exceeded all bounds of human decency.

108. Defendant Chicago Police Officers' intended to bring about apprehension of immediate harmful contact in Plaintiff or knew that their action would bring such apprehension.

109. In the alternative, the conduct of the Defendant Chicago Police Officers was willful and wanton and constituted a course of action which shows an actual or deliberate intention to cause harm or which, in not intentional, shows an utter indifference to or conscious disregard for the safety of others and/or their property.

110. The conduct of the Defendant Chicago Police Officers in illegally entering a home are generally associated with a risk of serious injuries. Numerous prior injuries have occurred to civilians in this context.

111. The Defendant Unknown Chicago Police Officers failed to take reasonable precaution after having knowledge of impending danger to Plaintiff.

112. The Defendant Chicago Police Officers' actions were the direct and proximate cause of Plaintiff apprehension.

113. Plaintiff has been seriously harmed by the Defendant Chicago Police Officers' actions.

114. In light of the character of the Defendant Chicago Police Officers' actions toward Plaintiff and the lasting or permanent psychological injury that Defendants' conduct has caused Plaintiff, defendants' conduct merits an award of punitive damages, actions, omissions and conduct above were undertaken with the intent to inflict and cause severe emotional distress to Plaintiff, with the knowledge of the high probability that their conduct would cause such distress, or in reckless disregard of the probability that their actions would cause such distress.

COUNT IV
BATTERY

115. Plaintiff re-alleges paragraphs 1 through 114 and incorporate them into this count by reference.

116. The actions of the Defendant Chicago Police Officers set forth above, including handcuffing Plaintiff force and restraining her while naked constituted an unwarranted physical touching.

117. The Defendant Chicago Police Officers intentionally took these actions.

118. In the alternative, the conduct of the Defendant Chicago Police Officers was willful and wanton and constituted a course of action which shows an actual or deliberate intention to cause harm or which, if not intentional, shows an utter indifference to or conscious disregard for the safety of Plaintiff Anjanette Young.

119. Plaintiff Young has been seriously harmed by the Defendant Chicago Police Officers' actions.

COUNT V
INVASION OF PRIVACY

120. Plaintiff re-alleges paragraphs 1 through 119 and incorporates them into this count. Plaintiff asserts her claim against the Defendant Chicago Police Officers who entered and/or searched 164 N. Hermitage Avenue, 1st Floor Apartment.

121. By obtaining and executing the search warrant when Defendant Chicago Police Officers did not have probable cause to believe that the target resided at the address given them by the J. Doe, Defendant Chicago Police Officers

physically invaded Plaintiff's right to and enjoyment of exclusive possession of their residence.

122. In the alternative, the conduct of the Defendant Chicago Police Officers willful and wanton and constituted a course of action which shows an actual or deliberate intention to cause harm or which, if not intentional, shows an utter indifference to or conscious disregard for Plaintiff's rights and enjoyment of exclusive possession of their residence.

123. The conduct of Defendant Chicago Police Officer's in entering and executing a residential search warrant are generally associated with a risk of serious injuries. Numerous prior injuries have occurred to civilians in this context. Defendant Chicago Police Officers failed to take reasonable precautions after having knowledge of impending danger to Plaintiff.

124. Defendant Chicago Police Officers' actions caused a physical invasion of Plaintiff's residence.

125. Plaintiff was harmed by Defendant Chicago Police Officers' physical invasion of her residence.

COUNT VI
TRESPASS

126. Plaintiff re-alleges paragraphs 1 through 125 and incorporates them into this count. Plaintiff asserts her claim against the Defendant Chicago Police Officers who entered and/or searched 164 N. Hermitage Avenue, 1st Floor Apartment.

127. The actions, omissions and conduct of Defendant Chicago Police Officers set forth above were extreme and outrageous and exceeded all bounds of human decency.

128. The Defendant Chicago Police Officers did not have a search warrant to search for Plaintiff or any known residents of the property, Defendant Chicago Police Officers physically invaded Plaintiff's right to and enjoyment of exclusive possession of her residence.

129. Furthermore, the conduct of the Defendant Chicago Police Officers was willful and wanton and constituted a course of action which shows an actual or deliberate intention to cause harm or which, if not intentional, shows an utter indifference to or conscious disregard for the safety of others and/or their property.

130. The Defendant Chicago Police Officers' actions caused a physical invasion of Plaintiff's residence.

131. Plaintiff were harmed by the Defendant Chicago Police Officers' physical invasion of their residence.

COUNT VII
RECKLESS (NEGLIGENT) INFLICTION OF EMOTIONAL DISTRESS

132. Plaintiff re-alleges paragraphs 1 through 131 above and incorporate them into this count.

133. Defendant Chicago Police Officers unreasonably approved and/or obtained a search warrant for 164 N. Hermitage Avenue, the wrong address for Andy L. Simpson, a fact which invalidated the warrant from the start, prior to execution.

134. Defendant Chicago Police Officers' subsequent unauthorized entry and search violated Plaintiff's Fourth Amendment right to be free from unreasonable searches of their persons or homes.

135. Moreover, Defendant Chicago Police Officers failed to "knock-and-announce" in circumstances where it was required.

136. As the sworn applicant for the warrant, Defendant Chicago Police Officer APORONGAO had a duty to discover and disclose to the issuing magistrate whether he had identified the correct address or place to be searched and not the residence of an innocent third party.

137. Defendant Chicago Police Officer APORONGAO and the officers named in this count reasonably knew or should have known that the intended target(s) of the warrant did not reside at 164 N. Hermitage Avenue, 1st Floor Apartment, and that Plaintiff did.

138. Defendant Chicago Police Officer APORONGAO and the other officers had a duty to reasonably investigate and verify information they received from J. Doe about where Mr. Simpson resided.

139. Such an inquiry was easy to make. Defendant Chicago Police Officers had multiple sources of information available to them at the time, had they bothered to use them.

140. They could have contacted the building's owner.

141. They could have contacted a utility company supplying energy to the building. They could have utilized CPD's own information sources, such as Accurint,

which assists officers in identifying apartments and the persons residing in them.

They could have conducted a LexisNexis search.

142. However, on information and belief, Defendant Chicago Police Officers did not conduct any investigation or verification or failed to conduct a reasonable one.

143. Consequently, in their complaint for a search warrant, Defendant Chicago Police Officers identified the wrong address, Plaintiff's address, a place they never had probable cause to enter and search.

144. Because Defendant Chicago Police Officers utterly failed to independently investigate and verify the place to be searched, theirs was not a good faith error.

145. Defendant Chicago Police Officer WOLINSKI approved Defendant Chicago Police Officer APORONGAO's application for a search warrant without ensuring that Defendant Chicago Police Officers had performed the due diligence required by CPD Special Order S04-19.

146. Defendant Chicago Police Officers' actions in these respects were objectively unreasonable and were undertaken intentionally, with malice and reckless indifference to Plaintiff's constitutional rights.

147. As the direct and proximate result of Defendant Chicago Police Officers' misconduct, Plaintiff's suffered and continues to suffer injury and harm.

148. Defendant Chicago Police Officers' conduct under this count merits an award of punitive damages to Plaintiff. Defendant Chicago Police Officers' shocking inaction in failing to perform required and basic reasonable due diligence to verify

the correct location for a search warrant before raiding and searching citizens' residence constituted an abuse of power and authority. Defendant Chicago Police Officers' actions – of relying solely on location information provided by a J. Doe confidential information – were directed towards at an honest, hard-working citizen who was totally innocent of all criminal conduct.

149. Defendant Chicago Police Officers' conduct toward Plaintiff was undertaken with willful and wanton disregard for the rights of others. Defendant Chicago Police Officers acted with actual intention or with a conscious disregard or indifference for the consequences when the known safety and health of Plaintiff was involved.

150. Defendant Chicago Police Officers acted with actual malice, with deliberate violence, willfully or with such gross negligence as to indicate a wanton disregard for the rights of others.

COUNT VIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

151. Plaintiff re-alleges paragraphs 1 through 150 and incorporates them into this count. Plaintiff asserts her claim against the Defendant Chicago Police Officers who entered and/or searched 164 N. Hermitage Avenue, 1st Floor Apartment.

152. The actions, omissions and conduct of Defendant Chicago Police Officers set forth above were extreme and outrageous and exceeded all bounds of human decency.

153. Defendant Chicago Police Officers' actions, omissions and conduct above were undertaken with the intent to inflict and cause severe emotional distress to Plaintiff, with the knowledge of the high probability that their conduct would cause such distress, or in reckless disregard of the probability that their actions would cause such distress.

154. Defendant Chicago Police Officers, who occupied positions of special trust and authority, knew, had reason to know or believe that Plaintiff, was especially vulnerable and fragile.

155. As a direct and proximate result of Defendant Chicago Police Officers' extreme and outrageous conduct, Plaintiff suffered and continues to suffer long-term, severe emotional distress and trauma.

156. In the alternative, Defendant Chicago Police Officers owed Plaintiff a duty of care that they breached when they pointed guns at her. Plaintiff is a direct victim of Defendant Chicago Police Officers' negligent infliction of emotional distress.

157. Furthermore, the conduct of the Defendant Chicago Police Officers was willful and wanton and constituted a course of action which shows an actual or deliberate intention to cause harm or which, if not intentional, shows an utter indifference to or conscious disregard for the safety of others and/or their property.

158. The conduct of Defendant Chicago Police Officers in entering and executing a residential search warrant are generally associated with a risk of serious injuries. Numerous prior injuries have occurred to civilians in this context.

Defendant Chicago Police Officers failed to take reasonable precautions after having knowledge of impending danger to Plaintiff.

159. Defendant Chicago Police Officers' actions was a proximate cause of Plaintiff's injuries and her extreme, severe, long-term emotional distress and trauma.

COUNT IX
CIVIL CONSPIRACY
(Conspiracy of Silence)

160. Plaintiff re-alleges paragraphs 1 through 159 and incorporates them into this count.

161. Plaintiff asserts her claim against the Defendant Chicago Police Officers who entered and/or searched 164 N. Hermitage Avenue, 1st Floor Apartment.

162. On the night of this incident, various Chicago Police Department Officers (both those on scene at Ms. Young's home an others) began a conspiracy to withhold from Ms. Young and the public the fact that they had in fact tortured Ms. Young for nearly an hour and raided the wrong home.

163. At various points between February 21, 2019 and December 30, 2020 when the Defendant City of Chicago FINALLY released ALL OF THE VIDEO relating to this incident and the relevant documents this conspiracy was active and alive amongst at least the following individuals:

- Mayor Lori E. Lightfoot;
- ALAIN APORONGAO, STAR NO. 4870;
- ALEX WOLINSKI, STAR NO. 2605;
- BRYAN MORDAN, STAR NO. 11437;
- GABRIEL CRUZ, STAR NO. 2844;
- MICHAEL ORTA, STAR NO. 11485;
- JOSEPH LISCIANDRELLO; STAR NO. 19362;
- MICHAEL DONNELLY, STAR NO. 13784;
- TITO JIMENEZ; STAR NO. 14955;
- FILIP BIENIASZ, STAR NO. 15454;
- NIKOLA SARIC, STAR NO. 18200;
- CODY MALONEY, STAR NO. 13032;
- ERIC ACEVEDO, STAR NO. 13560;
- Patrick Mullane, Deputy Press Secretary Office of Mayor Lori E. Lightfoot;
- Anthony Guglielmi, Chief Communications Officer, CPD;
- Susan Lee, Deputy Mayor for Public Safety;
- Tamika Puckett, Chief Risk Officer;
- Michael Crowley, Communications Director Office of Mayor Lori E. Lightfoot;
- Anjali Julka FOIA Officer - Office of Mayor Lori E. Lightfoot;
- Lauren Huffman, Deputy Communications Director Office of Mayor Lori E. Lightfoot;
- Anel Ruiz, Press Secretary Office of Mayor Lori E. Lightfoot;
- Bill McCaffrey, City of Chicago Department of Law Spokesperson;
- Michele D. Morris, Director of Risk Management CPD;

- Natalia M. Delgado, Law Department;
- Maurice Claussen, Chief of Staff, Office of Mayor Lori E. Lightfoot;
- Mike Milstein Deputy Director of Community Policing, CPD;
- Dana O'Malley General Counsel, Chicago Police Department;
- Steve Jarosz, Star No.: 1482; FOIA Officer, CPD;
- Vaughn Ganiyu Associate Staff Attorney, CPD; and
- Pedro Rodriguez; FOIA Office, CPD.

WHEREFORE for the foregoing reasons, Plaintiff ANJANETTE YOUNG demands judgment against Defendants THE CITY OF CHICAGO, and CHICAGO POLICE OFFICERS ALAIN APORONGAO, STAR NO. 4870; ALEX WOLINSKI, STAR NO. 2605; BRYAN MORDAN, STAR NO. 11437; GABRIEL CRUZ, STAR NO. 2844; MICHAEL ORTA, STAR NO. 11485; JOSEPH LISCIANDRELLO; STAR NO. 19362; MICHAEL DONNELLY, STAR NO. 13784; TITO JIMENEZ; STAR NO. 14955; FILIP BIENIASZ, STAR NO. 15454; NIKOLA SARIC, STAR NO. 18200; CODY MALONEY, STAR NO. 13032; and ERIC ACEVEDO, STAR NO. 13560 in an amount in EXCESS of FIFTY THOUSAND DOLLARS (\$50,000.00), the minimum jurisdictional limit of this Court, and for such other and further relief as the Court deems just and proper.

By: /s/ Keenan J. Saulter
Attorney for Plaintiff

Keenan J. Saulter
DaiSha R. Burkett
Saulter Law P.C.
Firm No. 62681
900 Ridge Road, Suite 3SE
Homewood, Illinois 60430
708.573.0060 Telephone
708.573.0061 Facsimile
kjs@saulterlaw.com

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION**

ANJANETTE YOUNG,)
)
Plaintiff,)

-vs-)
)

THE CITY OF CHICAGO; CHICAGO POLICE)
OFFICERS ALAIN APORONGAO, STAR NO.)
4870; ALEX WOLINSKI, STAR NO. 2605;)
BRYAN MORDAN, STAR NO. 11437;)
GABRIEL CRUZ, STAR NO. 2844;)
MICHAEL ORTA, STAR NO. 11485;)
JOSEPH LISCIANDRELLO; STAR NO. 19362;)
MICHAEL DONNELLY, STAR NO. 13784;)
TITO JIMENEZ; STAR NO. 14955;)
FILIP BIENIASZ, STAR NO. 15454;)
NIKOLA SARIC, STAR NO. 18200;)
CODY MALONEY, STAR NO. 13032;)
AND ERIC ACEVEDO, STAR NO. 13560,)
)
Defendants.)

Case No.:

Jury Trial Demanded

JURY DEMAND

Plaintiff assert her rights under the Article I, Section 13 of the Illinois Constitution and demands, in accordance with Section 5/2-1105 of Illinois Code of Civil Procedure, a trial by jury on all issues and all counts.

By: /s/ Keenan J. Saulter
Attorney for Plaintiff

Keenan J. Saulter
DaiSha R. Burkett
Saulter Law P.C.
Firm No. 62681
900 Ridge Road, Suite 3SE
P.O. Box 1475
Homewood, Illinois 60430
708.573.0060 Telephone
708.573.0061 Facsimile
kjs@saulterlaw.com

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION**

ANJANETTE YOUNG,)
)
Plaintiff,)
)
-vs-)
)
THE CITY OF CHICAGO; CHICAGO POLICE)
OFFICERS ALAIN APORONGAO, STAR NO.)
4870; ALEX WOLINSKI, STAR NO. 2605;)
BRYAN MORDAN, STAR NO. 11437;)
GABRIEL CRUZ, STAR NO. 2844;)
MICHAEL ORTA, STAR NO. 11485;)
JOSEPH LISCIANDRELLO; STAR NO. 19362;)
MICHAEL DONNELLY, STAR NO. 13784;)
TITO JIMENEZ; STAR NO. 14955;)
FILIP BIENIASZ, STAR NO. 15454;)
NIKOLA SARIC, STAR NO. 18200;)
CODY MALONEY, STAR NO. 13032;)
AND ERIC ACEVEDO, STAR NO. 13560,)
)
Defendants.)

Case No.:

Jury Trial Demanded

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(B)

Pursuant to Supreme Court Rule 222(b), counsel for the above-named Plaintiff certifies that Plaintiff seeks money damages that are in excess Fifty Thousand and 00/100ths Dollars (\$50,000).

By: /s/ Keenan J. Saulter
Attorney for Plaintiff

[X] Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true.

Keenan J. Saulter
DaiSha R. Burkett
Saulter Law P.C.
Firm No. 62681
900 Ridge Road, Suite 3SE
P.O. Box 1475
Homewood, Illinois 60430
708.573.0060 Telephone
708.573.0061 Facsimile
kjs@saulterlaw.com

Exhibit "A"

STATE OF ILLINOIS
COUNTY OF COOK

THE CIRCUIT COURT OF COOK COUNTY

COMPLAINT FOR SEARCH WARRANT

P.O. Alain Aporongao #4870, Chicago Police Department, 011th District, Complainant and J. Doe now appears before the undersigned judge of the Circuit Court of Cook County and the request the issuance of a search warrant to search.

SIMPSON, Andy L., a Male Black, IR#2257884, DOB [REDACTED] approximately 6'03", 180lbs, with medium complexion

and the premises:

[REDACTED] Chicago, Cook County, Illinois, a Grey brick 3 story apartment building with a red front door

and seize the following instruments, articles and things:

Black semi-auto handgun, ammunition, any articles or documents establishing residency, any locked containers and any other illegal contraband.

which have been used in the commission of, or which constitute evidence of the offense of:

UNLAWFUL USE OF WEAPON BY FELON 720 ILCS 5/24-1.1 (a)

Complainant says that he has probable cause to believe, based upon the following facts, that the above listed things to be seized are now located upon the person and premises set forth above:

I, Officer Alain Aporongao #4870, have been a Chicago Police Officer for over 6 years and during that time I have been assigned to the 011th District I have been involved in numerous search warrants and weapon related investigations. On 20FEB2019, I, Officer Alain Aporongao #4870, met with an individual whom from here on will be referred to as J. Doe for the purpose of safety and anonymity. J. Doe stated that with in the last 48 hours, J. Doe went to [REDACTED] apartment Chicago, Cook County, Illinois, to meet an individual J. Doe has known for over 10 years and during that time J. Doe has known SIMPSON, Andy L., IR#2257884 to reside at [REDACTED] apartment Chicago, Cook County, Illinois, for approximately the last 3 months. J. Doe stated while inside [REDACTED] apartment Chicago, Cook County, Illinois, SIMPSON, Andy L., IR#2257884 retrieved a semi-auto black handgun from his front waist band and showed J. Doe. J. Doe stated that SIMPSON, Andy L., IR#2257884 ejected the black magazine and showed J. Doe the live ammunition from the semi-automatic handgun. J. Doe stated that he knows the handgun was real because of his familiarity with hand guns and

Subscribed and sworn to before me on

2/24/17 10¹⁵ AM
J. Doe
COMPLAINANT
[Signature]

JUDGE

[REDACTED]

Judge's No. 207

FILED DATE: 2/19/2021 9:59 PM 2021L001939

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STATE OF ILLINOIS
COUNTY OF COOK

THE CIRCUIT COURT OF COOK COUNTY

COMPLAINT FOR SEARCH WARRANT

having fired a gun multiple times before.

J. Doe described the building located at [redacted] apartment Chicago, Cook County, Illinois, a Grey brick 3 story town house with a red front door.

On 20FEB2019, Officer Alain Aporongao #4870 was able to discover a picture of SIMPSON, Andy L., IR#2257884 on the Chicago Data Warehouse System. I, Officer Alain Aporongao #4870 showed this picture to J. Doe and J. Doe immediately identified the picture of SIMPSON, Andy L., IR#2257884 to that of SIMPSON, Andy L., IR#2257884 who resided at [redacted] apartment Chicago, Cook County, Illinois the individual s/he observed in the possession of the firearm. On 20FEB2019 I, Officer Alain Aporongao #4870 drove J. Doe to the apartment building that was clearly marked [redacted] Chicago, Cook County, Illinois and J. Doe identified that building as the one SIMPSON, Andy L., IR#2257884 resides in 1st floor apartment. I, Officer Alain Aporongao #4870, discovered SIMPSON, Andy L., IR#2257884 is a convicted felon under docket #15CR1135902.

J. Doe's criminal history, including possible pending investigations, if any, has been presented and been made available to the undersigned Judge. J. Doe swore to the contents of this complaint, and was made available to the undersigned Judge for questioning.

J. Doe

COMPLAINANT

Subscribed and sworn to before me on

2/21/19 10¹⁵ AM

JUDGE

[redacted]

Judge's No.

100

H 198725
H# 205184
Lt. K. [unclear] #334

AGA
Paul Joyce
Sun 2/20/19 1:52 PM
1:52 PM

FILED DATE: 2/19/2021 9:59 PM 2021L001939

The People of the State of Illinois to all peace officers of the state

SEARCH WARRANT

On this day P.O. Alain Aporongao #4870, Chicago Police Department, 011th District, Complainant and J. Doe has subscribed and sworn to a complaint for a search warrant before me. Upon Examination of the complaint, I find that it states facts sufficient to show probable cause.

I therefore command that you search:

SIMPSON, Andy L., a Male Black, IR#2257884, DOB [REDACTED] approximately 6'03", 180lbs, with medium complexion

and the premises:

[REDACTED] apartment Chicago, Cook County, Illinois, a Grey brick 3 story apartment building with a red front door

and seize the following instruments, articles and things:

Black semi-auto handgun, ammunition, any articles or documents establishing residency, any locked containers and any other illegal contraband.

which have been used in the commission of, or which constitute evidence of the offense of:

UNLAWFUL USE OF WEAPON BY FELON 720 ILCS 5/24-1.1 (a)

I further command that a return of anything so seized shall be made without necessary delay before me or before:

Judge

[Signature]

or before any court of competent jurisdiction.

JUDGE

[REDACTED]

2207

Judge's No.

Date and time of issuance:

2/21/19 10¹⁵ AM

FILED DATE: 2/19/2021 9:59 PM 2021L001939

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Exhibit "B"



CPD-31.903C (REV. 4/97)

CRIMINAL HISTORY REPORT

ORI/ILCPD0000

SIMPSON, ANDY L

IR # 2257884

SID # 22766471

FBI # 88714CE4

Current Arrest Information:

Date of Birth [REDACTED]

Age [REDACTED]

Place of Birth ILLINOIS

SSN #

Drivers License #

State

Scars, Marks, & Tattoos

>>> CONVICTED FELON <<<

MALE

BLACK

6'03"

180 lbs

EYES : BRO

HAIR : BLK

HAIR STYLE :

SHORT

COMPLEXION : MBR



Key Historical Identifiers:

<u>Aliases</u>	<u>Date used</u>	<u>Dates of Birth Use</u>	<u>Social Security Numbers Used</u>
SIMPSON, ANDY L	02-AUG-2014	[REDACTED]	[REDACTED]

Criminal Justice Summary: Total CPD Arrests: 4 (2 Felony, 2 Misdemeanor)

Total CPD Convictions: 1

-----ARREST-----

Arrest Name: SIMPSON, ANDY L

Arrest Date: 06-DEC-2018

Residence: [REDACTED]

Date of Birth: [REDACTED]

Dist. of Detention: CENTRAL MALE LOCKUP

CHICAGO, IL 60612

CB No: 019739171

Arrest Charges

Officer: CALLAHAN

[1] 3 F 720 ILCS 5.0/24-1.1-A

UW - WEAPON - FELON,
POSSESS/USE FIREARM

OFFENSE AS CITED

Star No: 15700

Unit:

Court Charges/Dispositions

Seq.	Statute	Charge	Case #
101	720-5/24-1.1-A	UW - WEAPON - FELON, POSSESS	M 18112362301
Disposition: SUPERCEDED BY INDICTMENT			04-JAN-2019
Disposition: TRANSFER - CRIMINAL DIVISION (MUNICIPAL DISTRICTS)			04-JAN-2019
Sentence:			
Sentence:			

CONFIDENTIAL - Further dissemination or unlawful use of information contained in this record is forbidden. When this record has served the purpose for which it was issued, it must be destroyed.

FILED DATE: 2/19/2021 9:59 PM 2021L001939



351 South Michigan Avenue/Chicago, Illinois 60606
 Identification Section



CRIMINAL HISTORY REPORT

PD-31.903C (REV. 4/97)

IR Number: 2257884

Name: SIMPSON, ANDY L

ARREST

Arrest Name: SIMPSON, ANDY L

Arrest Date: 10-SEP-2018

Residence: [REDACTED]

Date of Birth: [REDACTED]

Dist. of Detention: CENTRAL MALE LOCKUP

CHICAGO, IL 60612

CB No: 019701122

Arrest Charges

Officer: MARTIN

[1] L 9-76-050(B)

HEADLIGHT TWO REQUIRED-MOTOR VEHICLE OFFENSE AS CITED

Star No: 9683

[1] A M 625 ILCS 5.0/6-303-A

DRIVING ON SUSPENDED LICENSE OFFENSE AS CITED

[1] A M 720 ILCS 550.0/4-C

POSS CAN/>30-100 GRAM/1ST OFFENSE AS CITED

[1] A M 430 ILCS 85.0/2-14

OPERATE WITHOUT INSURANCE OFFENSE AS CITED

Unit:

Court Charges/Dispositions

Seq.	Statute	Charge	Case #
001	720-550/4-C	POSS CAN/>30-100 GRAM/1ST	M 18150221701
Disposition: SENTENCED/COUNTY DEPARTMENT OF CORRECTIONS			11-SEP-2018
Sentence: JAIL 000 YEARS 00 MONTHS 004 DAYS			11-SEP-2018

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CRIMINAL HISTORY REPORT

IR Number: 2257884

Name: SIMPSON, ANDY L

ARREST

Arrest Name: SIMPSON, ANDY L Arrest Date: 15-JUN-2015 Residence: [REDACTED]
 Date of Birth: [REDACTED] Dist. of Detention: CENTRAL MALE LOCKUP CHICAGO, IL 60612
 CB No: 019134097 Arrest Charges
 Officer: VEGA [3] X F 720 ILCS 5.0/18-2-A-2 ROBBERY - ARMED W/ FIREARM OFFENSE AS CITED
 Star No: 10294
 Unit: Court Charges/Dispositions

Seq.	Statute	Charge	Disposition	Sentence	Case #
001	720-5/18-1(A)	ROBBERY	SENTENCED/ILLINOIS DEPARTMENT OF CORRECTIONS	DOC 005 YEARS 00 MONTHS 000 DAYS	F 15CR1135902 11-MAR-2016 11-MAR-2016
					CONVICTED
001	720-5/18-2(A)(2)	ARMED ROBBERY/ARMED W/FIREARM	FINDING OF GUILTY OF LESSER INCLUDED OFFENSE		F 15CR1135902 10-FEB-2016
001	720-5/18-2-A-2	ROBBERY - ARMED W/ FIREARM	SUPERCEDED BY INDICTMENT		M 15111573001 14-JUL-2015
002	720-5/18-1(A)	ROBBERY	SENTENCED/ILLINOIS DEPARTMENT OF CORRECTIONS	DOC 005 YEARS 00 MONTHS 000 DAYS	F 15CR1135902 11-MAR-2016 11-MAR-2016
					CONVICTED
002	720-5/18-2(A)(2)	ARMED ROBBERY/ARMED W/FIREARM	FINDING OF GUILTY OF LESSER INCLUDED OFFENSE		F 15CR1135902 10-FEB-2016
002	720-5/18-2-A-2	ROBBERY - ARMED W/ FIREARM	SUPERCEDED BY INDICTMENT		M 15111573001 14-JUL-2015
003	720-5/18-1(A)	ROBBERY	SENTENCED/ILLINOIS DEPARTMENT OF CORRECTIONS	DOC 005 YEARS 00 MONTHS 000 DAYS	F 15CR1135902 11-MAR-2016 11-MAR-2016
					CONVICTED
003	720-5/18-2(A)(2)	ARMED ROBBERY/ARMED W/FIREARM	FINDING OF GUILTY OF LESSER INCLUDED OFFENSE		F 15CR1135902 10-FEB-2016
003	720-5/18-2-A-2	ROBBERY - ARMED W/ FIREARM	SUPERCEDED BY INDICTMENT		M 15111573001 14-JUL-2015
004	720-5/10-3.1(A)	AGGRAVATED UNLAWFUL RESTRAINT	FINDING OF NOT GUILTY		F 15CR1135902 10-FEB-2016
005	720-5/10-3.1(A)	AGGRAVATED UNLAWFUL RESTRAINT			F 15CR1135902

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CRIMINAL HISTORY REPORT

IR Number: 2257884 Name: SIMPSON, ANDY L

Arrest Name: SIMPSON, ANDY L 15-JUN-2015 Residence [REDACTED]

Court Charges/Dispositions

720-5/10-3.1(A)	AGGRAVATED UNLAWFUL RESTRAINT	F 15CR1135902
Disposition: FINDING OF NOT GUILTY		10-FEB-2016
Sentence:		

006 720-5/10-3.1(A)	AGGRAVATED UNLAWFUL RESTRAINT	F 15CR1135902
Disposition: FINDING OF NOT GUILTY		10-FEB-2016
Sentence:		

-----ARREST-----

Arrest Name: SIMPSON, ANDY L Arrest Date: 02-AUG-2014 Residence [REDACTED]

Date of Birth: [REDACTED] Dist. of Detention: CENTRAL MALE LOCKUP CHICAGO, IL 60612

CB No: 018947129

Arrest Charges

Officer: VOGLER [1] A M 720 ILCS 5.0/21-1-1-A CRIM DAMAGE PROP-KNOWINGLY OFFENSE AS CITED
Star No: 16342 DAMAGE <\$300

Unit: Court Charges/Dispositions

Seq.	Statute	Charge	Case #
001	720-5/21-1-1-A	CRIM DAMAGE PROP-KNOWINGLY DA	M 14123070901
	Disposition: STRICKEN FROM DOCKET WITH LEAVE TO REINSTATE		27-AUG-2014
	Sentence:		

*** End of Record ***

FILED DATE: 2/19/2021 9:59 PM 2021L001939