IN THE MATTER OF CHARGES AGAINST)	
Officer Eulalio Rodriguez)	
<i>2</i>	j j	Case No.: 23 PB 3013
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28th day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March Pary 2024

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Service List: hillina.tamrat@cityofchicago acaffarelli@caffarelli.com

Respondent.			
Police Officer Eulalio Rodriguez)	No.	23 PB 3013
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Eulalio Rodriguez, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On January 17, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Eulalio
 Rodriguez seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that

have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Eulalio Rodriguez by and through his attorneys

of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson

311 W. Superior St., Ste. 215

Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

IN THE MATTER OF CHARGES AGAINST)	
Officer Amin Elmesquine)	
-)	Case No.: 23 PB 3014
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March February

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Service List:

hillina.tamrat@cityofchicago.org maria.vuolo-milan@cityofchicago.org roxana.sanchez@cityofchicago.org daniel.broadwell@cityofchicago.org

Respondent.			
Police Officer Amin Elmesquine)	No.	23 PB 3014
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Amin Elmesquine, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On January 17, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Amin Elmesquine seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration. On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that

have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Amin Elmesquine by and through his attorneys

of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson

311 W. Superior St., Ste. 215

Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

IN THE MATTER OF CHARGES AGAINST)	
Officer Noble Williams)	Case No.: 23 PB 3018
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March Think Jo24

Signed:

/s/Timothy M. Grace Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Service List:

hillina.tamrat@cityofchicago.org maria.vuolo-milan@cityofchicago.org roxana.sanchez@cityofchicago.org daniel.broadwell@cityofchicago.org

IN THE MATTER OF CHARGES AGAINST)		
Police Officer Noble Williams)	No.	23 PB 3018
Respondent.			

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Noble Williams, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On February 17, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Noble Williams seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration. On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly within the parameters and consistent with Judge Mullen's ruling and he is exercising his right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Noble Williams by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Respectfully submitted,

/s/Timothy M. Grace
Timothy M. Grace

/s/James E. Thompson James E. Thompson

Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654 P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Police Board Proceedings.

IN THE MATTER	R OF CHARGES AGAINST)	
Officer Daniel Ba	rnak)	
)	Case No.: 23 PB 3022
)	
3.	Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March 2024

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654 P: (312) 943-0600 F: (312) 943-7133 connorgrace@aol.com

Service List:

hillina.tamrat@cityofchicago.org maria.vuolo-milan@cityofchicago.org maw@franczek.com donna.pappas@cityofchicago.org marycatherine.gruber@cityofchicago.org

Respondent.			
Police Officer Daniel Barnak)	No.	23 PB 3022
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Daniel Barnak, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On April 10, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Daniel Barnak seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration. On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that

have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Daniel Barnak by and through his attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson

311 W. Superior St., Ste. 215

Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

IN THE MATTER OF CHARGES AGAINST)	
Officer Adrianna Kondilis)	
)	Case No.: 23 PB 3024
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March 2024 Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Service List:

hillina.tamrat@cityofchicago.org maria.vuolo-milan@cityofchicago.org maw@franczek.com donna.pappas@cityofchicago.org marycatherine.gruber@cityofchicago.org

Respondent.			
Police Officer Adrianna Kondilis)	No.	23 PB 3024
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Adrianna Kondilis, by and through her attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On April 10, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Aldolfo Bolanos seeking her termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook
 County seeking to enforce the Final Opinion and Award and sometime thereafter the City
 of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was
 filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a

procedure. This order applies to *all* pending disciplinary hearings that

have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and she is exercising her

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Adrianna Kondilis Bolanos by and through her

attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request

that this Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all

Chicago Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/<u>s/James E. Thompson</u>

James E. Thompson

Grace & Thompson

311 W. Superior St., Ste. 215

Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

IN THE MATTER OF CHARGES AGAINST)	
Officer Eric Stillman)	
)	Case No.: 23 PB 3025
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28th day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March Page 2634

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Service List:

hillina.tamrat@cityofchicago.org

Jlydon@hinshawlaw.com

Bzeeck@hinshawlaw.com

DMikhail@hinshawlaw.com

IN THE MATTER OF CHARGES AGAINST)		
Police Officer Eric Stillman)	No.	23 PB 3025

Respondent.

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Eric Stillman, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On April 10, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Eric Stillman seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration. On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook
 County seeking to enforce the Final Opinion and Award and sometime thereafter the City
 of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was
 filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that

have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Eric Stillman by and through his attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/<u>s/James E. Thompson</u>

James E. Thompson

Grace & Thompson

311 W. Superior St., Ste. 215

Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

IN THE MATTER OF CHARGES AGAINST)	
Officer Mark Johnson)	
	Ć	Case No.: 23 PB 3029
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28th day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654 P: (312) 943-0600 F: (312) 943-7133

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Service List:

hillina.tamrat@cityofchicago.org sabrina.wilkins@att.net Maria.Vuolo-milan@cityofchicago.org

Respondent.			
Police Officer Mark Johnson)	No.	23 PB 3029
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Mark Johnson, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On June 14, 2023 the City of Chicago, by and through the Chicago Superintendent of
 Police, ("City of Chicago") did file charges against Chicago Police Officer Mark Johnson
 seeking to suspend him for 366 days from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.

7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that

have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Mark Johnson by and through his attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson

311 W. Superior St., Ste. 215

Chicago, Illinois 60654

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connorgrace@aol.com

IN THE MATTER OF CHARGES AGAINST)	
Officer Patrick Bunyon)	
)	Case No.: 23 PB 3030
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28th day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March 2024

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654 P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

B. ...

Service List: hillina.tamrat@cityofchicago.org Maria.Scavo@gtlaw.com David.Stein@gtlaw.com

Police Officer Patrick Bunyon)	No	23 PB 3030
Respondent.	,	110.	23 1 1 3 0 3 0

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Patrick Bunyon, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On June 28, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Patrick Bunyon seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook
 County seeking to enforce the Final Opinion and Award and sometime thereafter the City
 of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was
 filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Patrick Bunyon by and through his attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson

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Chicago, Illinois 60654

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IN THE MATTER OF CHARGES AGAINST)	
Officer Kris Stipanov)	
•)	Case No.: 23 PB 3032
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28th day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March 2024 Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

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Service List:

hillina.tamrat@cityofchicago.org kelley.garner@cityofchicago.org maria.vuolo-milan@cityofchicago.org jennifer.caliva@cityofchicago.org daniel.broadwell@cityofchicao.org

Respondent.			
Police Officer Kris Stipanov)	No.	23 PB 3032
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Kris Stipanov, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On August 9, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Kris Stipanov seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook
 County seeking to enforce the Final Opinion and Award and sometime thereafter the City
 of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was
 filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to all pending disciplinary hearings that have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Kris Stipanov by and through his attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson 311 W. Superior St., Ste. 215

Chicago, Illinois 60654

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IN THE MATTER OF CHARGES AGAINST)	
Officer Bernadette Kelly)	
·	j	Case No.: 23 PB 3033
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March 2024

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

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Service List:

hillina.tamrat@cityofchicago.org jennifer.caliva@cityofchicago maria.vuolo-milan@cityofchicago.org beatriz.matias@cityofchicago.org

Respondent.			
Police Officer Bernadette Kelly)	No.	23 PB 3033
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Bernadette Kelly, by and through her attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- 1. On September 5, 2023 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Bernadette Kelly seeking her termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook
 County seeking to enforce the Final Opinion and Award and sometime thereafter the City
 of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was
 filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

As the City of Chicago is required by the terms of the Supplemental Final Opinion and Award to offer any police officer, who is protesting a suspension in excess of 365 days and separations (dismissal), with the option to present any grievance to final and binding arbitration instead of having the Chicago Police Board decide the disciplinary actions, the City of Chicago is hereby enjoined and prohibited from conducting any such

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly

within the parameters and consistent with Judge Mullen's ruling and she is exercising her

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Bernadette Kelly and through her attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson 311 W. Superior St., Ste. 215

Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

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3

IN THE MATTER OF CHARGES AGAINST)	
Officer Stefanie Mingari)	
9	j j	Case No.: 23 PB 3034
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March 2024

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

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Service List:

hillina.tamrat@cityofchicago.org maria.vuolo-milan@cityofchicago.org maw@franczek.com donna.pappas@cityofchicago.org marycatherine.gruber@cityofchicago.org

Respondent.			
Police Officer Stefanie Mingari)	No.	23 PB 3034
IN THE MATTER OF CHARGES AGAINST)		

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Stefanie Mingari, by and through her attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On September 5, 2023 the City of Chicago, by and through the Chicago Superintendent
 of Police, ("City of Chicago") did file charges against Chicago Police Officer Stefanie
 Mingari seeking her termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration.

 On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.
- 7. Specifically, the Court ordered:

As the City of Chicago is required by the terms of the Supplemental Final Opinion and Award to offer any police officer, who is protesting a suspension in excess of 365 days and separations (dismissal), with the option to present any grievance to final and binding arbitration instead of having the Chicago Police Board decide the disciplinary actions, the City of Chicago is hereby enjoined and prohibited from conducting any such

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly within the parameters and consistent with Judge Mullen's ruling and she is exercising her

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Stefanie Mingari by and through her attorneys

of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace

Timothy M. Grace

/s/James E. Thompson

James E. Thompson

Grace & Thompson 311 W. Superior St., Ste. 215

Chicago, Illinois 60654

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3

IN THE MATTER OF CHARGES AGAINST)	
Officer Aldolfo Bolanos)	
)	Case No.: 23 PB 3037
)	
Respondent.)	

NOTICE OF MOTION

To: Please see below

PLEASE TAKE NOTICE that on this 28^{th} day of March 2024, I caused to be filed with the Police Board of the City of Chicago the attached Motion.

Respectfully Submitted,

/s/Timothy M. Grace
Timothy M. Grace

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on this 28th Day of March, 2024, I caused copies of this Notice and accompanying Motion to be sent to the below listed parties at their above listed addresses via regular and electronic U.S. mail.

Date: 28 March Date: 28 March

Signed:

/s/Timothy M. Grace
Timothy M. Grace

Timothy M. Grace Gottreich Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

Service List:

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Jlydon@hinshawlaw.com

moliver@hinshawlaw.com

DMikhail@hinshawlaw.com

Police Officer Aldolfo Bolanos)	No.	23 PB 3037
	,	110.	23 TB 3037
Respondent.			

MOTION TO TRANSFER THIS MATTER TO THE ARBITRATION CALL AND TERMINATE ALL POLICE BOARD PROCEEDINGS

NOW COMES, Chicago Police Officer Aldofo Bolanos, by and through his attorneys of record, TIMOTHY M. GRACE and JAMES E. THOMPSON, and files this Motion to Transfer this Matter to the Arbitration Call and Terminate all Chicago Police Board Proceedings, and in support of this motion states the following:

- On January 19, 2024 the City of Chicago, by and through the Chicago Superintendent of Police, ("City of Chicago") did file charges against Chicago Police Officer Aldolfo Bolanos seeking his termination from the Chicago Police Department.
- 2. On August 2, 2023, a Supplemental Interim Opinion and Award was entered by the designated Neutral Chair Arbitrator pursuant to the Dispute Resolution Board under the Collective Bargaining Agreement between the City of Chicago and Chicago John Dineen Lodge #7 ("The Lodge"). The Supplemental Interim Award held that the right to arbitration was grounded in "long and established case law in Illinois"; the grievance procedure of the Illinois Public Labor Relation Act, IPLRA 5 ILCS 315/8; the supremacy clause in section 15 of the IPLRA, 5 ILCS 315/15; and the Worker's Right Amendment to the Illinois Constitution, Art. I §25. The award held that Chicago Police Officers had

- the right to proceed by arbitration in termination cases or cases where the City of Chicago is seeking a suspension of more than 365 days.
- 3. On August 11, 2023, following the issuance of the Supplemental Interim Opinion and Award, The Lodge filed on the behalf of the Petitioner, a two-part motion to transfer this case to the arbitration call or in the alternative to stay all pending proceedings. The purpose of this motion was to preserve the Petitioner's fundamental right to arbitration. On September 26, 2023 the Chicago Police Board denied that motion.
- 4. On October 19, 2023 the Neutral Chair issued a Final Opinion and Award which was sent to the City Council of the City of Chicago for ratification pursuant to the Collective Bargaining Agreement. The City Council refused to accept the Final Opinion and Award and it failed to ratify the award.
- 5. On January 4, 2024, The Lodge filed a verified complaint in the Circuit Court of Cook County seeking to enforce the Final Opinion and Award and sometime thereafter the City of Chicago filed an answer and counter claim. A motion to dismiss the counterclaim was filed by The Lodge and cross-motions for summary judgement were filed by both parties.
- 6. After extensive briefing and oral argument, the circuit court issued a 26 page decision where it held that Chicago Police Officers who are subject to termination or a suspensions of more than 365 days have an absolute right to grievance arbitration thus enforcing the Final Opinion and Award.

7. Specifically, the Court ordered:

As the City of Chicago is required by the terms of the Supplemental Final Opinion and Award to offer any police officer, who is protesting a suspension in excess of 365 days and separations (dismissal), with the option to present any grievance to final and binding arbitration instead of having the Chicago Police Board decide the disciplinary actions, the City of Chicago is hereby enjoined and prohibited from conducting any such

disciplinary hearings before the Chicago Police Board unless any officer so charged on or after September 14, 2002, has consented to such a procedure. This order applies to *all* pending disciplinary hearings that have not proceeded to an evidentiary hearing.

Memorandum Opinion and Order, Hon. Judge Michael T. Mullens March 21, 2024 24CH00093.

8. Petitioner has filed a grievance seeking to arbitrate this case. This request is clearly within the parameters and consistent with Judge Mullen's ruling and he is exercising his

right to proceed by grievance arbitration on the charges filed before this Police Board.

9. Upon this election, the Chicago Police Board has lost jurisdiction of this case based upon

the circuit court's order and all charges should be immediately dismissed from its docket.

WHEREFORE, Chicago Police Officer Aldolfo Bolanos by and through his attorneys of

record, TIMOTHY M. GRACE and JAMES E. THOMPSON, respectfully request that this

Chicago Police Board Transfer this Matter to the Arbitration Call and Terminate all Chicago

Police Board Proceedings.

Respectfully submitted,

/s/Timothy M. Grace Timothy M. Grace

/<u>s/James E. Thompson</u> James E. Thompson

Grace & Thompson 311 W. Superior St., Ste. 215 Chicago, Illinois 60654

P: (312) 943-0600 F: (312) 943-7133

connorgrace@aol.com

3