## **CHARGES**

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating the following rules contained in Article V of the Rules and Regulations of the Chicago Police Department, which were in full force and effect on the date of the alleged violations:

Rule 1: Violation of any law or ordinance.

Rule 2: Any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department.

Rule 4: Any action or conduct taken to use the official position for personal gain or influence.

Rule 5: Failure to perform any duty.

Count I:

Rule 14: Making a false report, written or oral.

Rule 26: Failure to provide the Department with a current address and telephone number.

Rule 40: Failure to inventory and process recovered property in conformance with Department orders.

## **SPECIFICATIONS**

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 1, "Violation of any law or ordinance," in one or more of the following instances:

within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he received, or agreed to accept, a personal advantage which he was not authorized by law to accept, knowing that such personal advantage was promised or tendered with the intent to cause him to influence the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings received, or agreed to accept, sexual favors from Olivia Robinson, knowing that these sexual favors were promised or tendered by Olivia Robinson to

convince him to reduce her charges, in violation of Chapter 720, Act 5, Section 33-1(d) of the Illinois Compiled Statutes, 1992, as amended; and/or

On or about January 6, 2001 through and including January 7, 2001, at and

Count II:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he solicited, received, or agreed to accept, a personal advantage, to wit: sexual favors from Olivia Robinson, with the understanding that he would improperly influence or attempt to influence, the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings solicited, received, and/or agreed to accept sexual favors from Olivia Robinson with the understanding that in return for her sexual favors, he would charge her with a less serious charge, in violation of Chapter 720, Act 5, Section 33-1(e) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count III:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he received, or agreed to accept, a personal advantage which he was not authorized by law to accept, knowing that such personal advantage was promised or tendered with the intent to cause him to influence the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings received, or agreed to accept, sexual favors from Darlene Brown, knowing that these sexual favors were promised or tendered by Olivia Robinson to convince him to reduce her charges, in violation of Chapter 720, Act 5, Section 33-1(d) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count IV:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he solicited, received, or agreed to accept, a personal advantage, to wit: sexual favors from Darlene Brown, with the understanding that he would improperly influence or attempt to influence, the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings solicited, received, and/or agreed to accept sexual favors from Darlene Brown with the understanding that in return for her sexual favors, he would charge her with a less serious charge, in violation of Chapter 725, Act 5, Section 33-1(e) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count V:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, you committed the offense of Bribery, in that you solicited a personal advantage, to wit: sexual favors from Wanda Bryant, with the understanding that you would improperly influence the performance of any act related to your employment or function as a public employee, to wit: while a Chicago Police Officer you solicited sexual favors from Wanda Bryant in exchange for keeping her from going to jail on her charge, in violation of Chapter 725, Act 5, Section 33-1(e) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count VI:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he in his official capacity as Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he committed the offense of Battery in that he knowingly and without legal justification, made physical contact of an insulting nature with arrestee Robin Lance by running his hand up her leg, in violation of Chapter 720, Act 5, Section 33-3(b) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count VII:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he, in his official capacity as a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he solicited and/or accepted sexual favors from Olivia Robinson in exchange for initially causing her charge to be reduced so that she would not be held in custody overnight, in violation of Chapter 720, Act 5, Section 33-3(c) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count VIII:

On or about January 6, 2001, at and within County of Cook, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, a public employee in his official capacity as a Chicago Police Officer, knowingly accepted for the performance of an act, a fee or reward, which he knew was not authorized by law, to wit: he accepted sexual favors from Olivia Robinson as a fee or reward for initially causing her charge to be reduced so that she would not be held in custody overnight, in violation of Chapter 720, Act 5, Section 33-3(d) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count IX:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he, in his official capacity as a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he solicited and/or accepted sexual favors from Darlene Brown in exchange for initially causing her charge to be reduced so that she would not be held in custody overnight, in violation of Chapter 720, Act 5, Section 33-3(c) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count X:

On or about January 6, 2001, at and within County of Cook, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, a public employee in his official capacity as a Chicago Police Officer, knowingly accepted for the performance of an act, a fee or reward, which he knew was not authorized by law, to wit: he accepted sexual favors from Darlene Brown as a fee or reward for initially causing her charge to be reduced so that she would not be held in custody overnight, in violation of Chapter 720, Act 5, Section 33-3(d) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count XI: On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, in his official capacity as a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he solicited sexual favors from arrestee Wanda Bryant while she was in custody, in violation of Chapter 720, Act 5, Section 33-3(c) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count XII: On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, a public employee in his official capacity, to wit: a Chicago Police Officer, knowingly solicited for the performance of an act, a fee or reward, which he knew was not authorized by law, to wit: he accepted sexual favors from arrestee Wanda Bryant in exchange for keeping her from going to jail on her charge, in violation of Chapter 720, Act 5, Section 33-3(d) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count XIII: On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, in his official capacity, to wit: a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he asked arrestee Nicole Tate, while in custody, to open her shirt and show her breasts for sexual gratification, in violation of Chapter 720, Act 5, Section 33-3(c) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count XIV: On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that; he, in his official capacity as a Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he committed the offense of Disorderly Conduct (Chapter 720 ILCS, 5/26-1(a)(11) in that he transmitted or caused to be transmitted, false Chicago Police Department report(s) stating that Darlene brown and/or Olivia Robinson had committed the offense of unlawful sale of alcohol, MCC 4-60-140(c), without reasonable grounds necessary to believe that transmitting the report(s) was necessary for the safety and welfare of the public, in violation of Chapter 720, Act 5, Section 33-3(b) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count XV: On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he, in his official capacity as a Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he violated the Chicago Police Department Rules of Conduct, Rule 14, by making false Police reports pertaining to Darlene Brown and/or Olivia Robinson, in violation of Chapter 720, Act 5, Section 33-3(b) of the Illinois Compiled Statutes, 1992, as amended; and/or

Count XVI: On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct in that, he, in his official capacity as a Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he violated the Chicago Police Department Rules of Conduct, Rule 48, by soliciting and/or accepting a gratuity, gift, present or reward, to wit: sexual favors from Darlene Brown and/or Olivia Robinson in exchange for a service rendered by him, to wit: initially causing their charge(s) to be reduced so that Darlene Brown and/or Olivia Robinson would not be held in custody overnight, in violation of Chapter 720, Act 5, Section 33-3(b) of the Illinois Compiled Statutes, 1992, As Amended.

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 2, "Any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department," in one or more of the following instances:

Count I:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he received, or agreed to accept, a personal advantage which he was not authorized by law to accept, knowing that such personal advantage was promised or tendered with the intent to cause him to influence the performance of any act related to his employment or function as a public employee to wit: while a Chicago Police Officer, Officer Jennings received, or agreed to accept, sexual favors from Olivia Robinson, knowing that these sexual favors were promised or tendered by Olivia Robinson to convince him to reduce her charges.

Count II:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he solicited, received, or agreed to accept, a personal advantage, to wit: sexual favors from Olivia Robinson, with the understanding that he would improperly influence or attempt to influence, the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings solicited, received, and/or agreed to accept sexual favors from Olivia Robinson with the understanding that in return for her sexual favors, he would charge her with a less serious charge.

Count III:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he received, or agreed to accept, a personal advantage which he was not authorized by law to accept, knowing that such personal

advantage was promised or tendered with the intent to cause him to influence the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings received, or agreed to accept, sexual favors from Darlene Brown, knowing that these sexual favors were promised or tendered by Olivia Robinson to convince him to reduce her charges.

Count IV:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Bribery, in that he solicited, received, or agreed to accept, a personal advantage, to wit: sexual favors from Darlene Brown, with the understanding that he would improperly influence or attempt to influence, the performance of any act related to his employment or function as a public employee, to wit: while a Chicago Police Officer, Officer Jennings solicited, received, and/or agreed to accept sexual favors from Darlene Brown with the understanding that in return for her sexual favors, he would charge her with a less serious charge.

Count V:

On or about January 6, 2001 through and including January 7, 2001, at and within Cook County, Illinois, you committed the offense of Bribery, in that you solicited a personal advantage, to wit: sexual favors from Wanda Bryant, with the understanding that you would improperly influence the performance of any act related to your employment or function as a public employee, to wit: while a Chicago Police Officer you solicited sexual favors from Wanda Bryant in exchange for keeping her from going to jail on her charge.

Count VI:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he in his official capacity as Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he committed the offense of Battery in that he knowingly and without legal justification, made physical contact of an insulting nature with arrestee Robin Lance by running his hand up her leg.

Count VII:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he, in his official capacity as a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he solicited and/or accepted sexual favors from Olivia Robinson in exchange for initially causing her charge to be reduced so that she would not be held in custody overnight.

Count VIII:

On or about January 6, 2001, at and within County of Cook, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, a public employee in his official capacity as a Chicago Police Officer, knowingly accepted for the performance of an act, a fee or reward, which he knew was

not authorized by law, to wit: he accepted sexual favors from Olivia Robinson as a fee or reward for initially causing her charge to be reduced so that she would not be held in custody overnight.

Count IX:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he, in his official capacity as a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he solicited and/or accepted sexual favors from Darlene Brown in exchange for initially causing her charge to be reduced so that she would not be held in custody overnight.

Count X:

On or about January 6, 2001, at and within County of Cook, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, a public employee in his official capacity as a Chicago Police Officer, knowingly accepted for the performance of an act, a fee or reward, which he knew was not authorized by law, to wit: he accepted sexual favors from Darlene Brown as a fee or reward for initially causing her charge to be reduced so that she would not be held in custody overnight.

Count XI:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, in his official capacity as a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he solicited sexual favors from arrestee Wanda Bryant while she was in custody.

Count XII:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, a public employee in his official capacity, to wit: a Chicago Police Officer, knowingly solicited for the performance of an act, a fee or reward, which he knew was not authorized by law, to wit: he accepted sexual favors from arrestee Wanda Bryant in exchange for keeping her from going to jail on her charge.

Count XIII:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that, he, in his official capacity, to wit: a Chicago Police Officer, with intent to obtain a personal advantage for himself, performed an act in excess of his lawful authority, to wit: he asked arrestee Nicole Tate, while in custody, to open her shirt and show her breasts for sexual gratification.

Count XIV:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that; he, in his official capacity as a Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he committed the offense of Disorderly Conduct (Chapter 720 ILCS, 5/26-1(a)(11) in that he

transmitted or caused to be transmitted, false Chicago Police Department report(s) stating that Darlene brown and/or Olivia Robinson had committed the offense of unlawful sale of alcohol, MCC 4-60-140(c), without reasonable grounds necessary to believe that transmitting the report(s) was necessary for the safety and welfare of the public.

Count XV:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct, in that he, in his official capacity as a Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he violated the Chicago Police Department Rules of Conduct, Rule 14, by making false Police reports pertaining to Darlene Brown and/or Olivia Robinson.

Count XVI:

On or about January 6, 2001, at and within Cook County, Illinois, Officer Jennings committed the offense of Official Misconduct in that, he, in his official capacity as a Chicago Police Officer, knowingly performed an act which he knew was forbidden by law to perform, to wit: he violated the Chicago Police Department Rules of Conduct, Rule 48, by soliciting and/or accepting a gratuity, gift, present or reward, to wit: sexual favors from Darlene Brown and/or Olivia Robinson in exchange for a service rendered by him, to wit: initially causing their charge(s) to be reduced so that Darlene Brown and/or Olivia Robinson would not be held in custody overnight.

Count XVII:

On or about January 6, 2001, while at the Howard Johnson Hotel, Room 01. 730 North La Salle, Chicago, Illinois, Officer Jennings recovered suspected cannabis from Darlene Brown during a custodial search and failed to charge her with possession of cannabis.

Count XVIII: On or about January 6, 2001, while at the Howard Johnson Hotel, 730 North LaSalle, Chicago, Illinois, inside Room 01, Officer Jennings recovered suspected cannabis from Darlene Brown during a custodial search and failed to inventory the suspected cannabis.

Count IX:

On or about January 7, 2001, while at the Homewood Suites Hotel, 40 East Grand, Chicago, Illinois, in Room 1220, Officer Jennings returned to Darlene Brown, the suspected cannabis he had previously recovered from Ms. Brown and allowed Darlene Brown and Olivia Robinson to smoke the suspected cannabis in his presence.

Count XX:

On or about January 6, 2001, Officer Jennings submitted one or more false report(s) by indicating that Robin Lance and/or Olivia Robinson and/or Nicole Tate and/or Darlene Brown and/or Wanda Bryant were arrested on the street at 120 West Superior, when in fact Lance and/or Robinson and/or Tate and/or Brown and/or Bryant were arrested in Room 01 at the Howard Johnson Hotel, 720 North LaSalle, Chicago, Illinois.

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 4, "Any action or conduct taken to use the official position for personal gain or influence," in one or more of the following instances:

Count I:

On or about January 6, 2001, in the 18<sup>th</sup> District Station, Officer Jennings solicited sexual favors from arrestee Robin Lance in exchange for reducing the charge against her.

Count II:

On or about January 6, 2001, in the 18<sup>th</sup> District Station, Officer Jennings solicited sexual favors from arrestee Nicole Tate in exchange for reducing the charge against her.

Count III:

On or about January 6, 2001, in the 18<sup>th</sup> District Station, Officer Jennings solicited sexual favors from arrestee Wanda Bryant in exchange for reducing the charge against her.

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 5, "Failure to perform any duty," in one or more of the following instances:

Count I:

On or about January 6, 2001; while at the Howard Johnson Hotel, Room 01, 730 North LaSalle, Chicago, Illinois, Officer Jennings recovered suspected cannabis from Darlene Brown during a custodial search and failed to charge her with cannabis possession.

Count II:

On or about January 6, 2001; while at the Howard Johnson Hotel, 730 North LaSalle, Chicago, Illinois, in Room 01, Officer Jennings recovered suspected cannabis from Darlene Brown during a custodial search and failed to inventory the suspected cannabis.

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 14 "Making a false report, written or oral," in one or more of the following instances:

Count I:

On January 6, 2001, Police Officer Jennings submitted an arrest report indicating that Robin Lance had been arrested on the street at 120 West Superior, when, in fact, Robin Lance was arrested in Room 01, at the Howard Johnson Hotel, 720 North LaSalle Street, Chicago, Illinois.

Count II:

On January 6, 2001, Police Jennings submitted an arrest report indicating that Olivia Brown had been arrested on the street at 120 West Superior, when, in fact, Olivia Brown, was arrested in Room 01, at the Howard Johnson Hotel, 720 North La Salle, Chicago, Illinois.

Count III:

On January 6, 2001, Police Officer Jennings submitted an arrest report indicating that Nicole Tate had been arrested on the street at 120 West Superior, when in fact, Nicole Tate was arrested in Room 01, at the Howard Johnson Hotel, 720 North La Salle, Chicago, Illinois.

Count IV:

On or about January 6, 2001, Police Officer Jennings submitted an arrest report indicating that Darlene Brown had been arrested on the street at 120 West Superior, when, in fact, Darlene Brown was arrested in Room 01, at the Howard Johnson Hotel, 720 North LaSalle Street, Chicago, Illinois.

Count V:

On or about January 6, 2001, Police Jennings submitted an arrest report indicating that Wanda Bryant had been arrested on the street at 120 West Superior, when, in fact, Wanda Bryant, was arrested in Room 01, at the Howard Johnson Hotel, 720 North LaSalle, Chicago, Illinois.

Count VI:

On or about January 6, 2001, Police Officer Jennings prepared a false Vice Case Report, G-012257, by indicating that Robin Lance had been arrested for solicitation for Prostitution on the street at 120 West Superior, when in fact, Robin Lance was arrested in Room 01, at the Howard Johnson Hotel, 720 North LaSalle, Chicago, Illinois.

Count VII:

On or about January 6, 2001, Police Officer Jennings prepared a false Vice Case Report, G-012257, indicating that Wanda Bryant had been arrested for solicitation for Prostitution on the street at 120 West Superior, when in fact, Wanda Bryant was arrested in Room 01, at the Howard Johnson Hotel, 720 North La Salle, Chicago, Illinois.

Count VIII:

On or about January 6, 2001, Police Officer Jennings prepared a false Vice Case Report, G-012257, by indicating that Nicole Tate had been arrested for solicitation for Prostitution on the street at 120 West Superior, when in fact, Nicole Tate was arrested in Room 01, at the Howard Johnson Hotel, 720 North LaSalle, Chicago, Illinois.

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 26 "Failure to provide the Department with a current address and telephone number," in the following instance:

Officer Jennings failed to provide the Department with a current address and/or telephone number in that Officer Jennings' address of record is listed as 900 West 53<sup>rd</sup> Street, Chicago, Illinois, when in fact, Officer Jennings resides at 3419 West Carroll, Chicago, Illinois.

Police Officer Eugene F. Jennings, Star Number 11158, is charged with violating Rule 40 "Failure to inventory and process recovered in conformance with Department orders," in the following instance:

On or about January 6, 2001, while at the Howard Johnson Hotel, 730 North La Salle, Chicago, Illinois, in Room 01 Officer Jennings recovered suspected cannabis from Darlene Brown during a custodial search and failed to inventory the suspected cannabis.

Based on the foregoing charges and specifications, the Superintendent of Police recommends that Police Officer Eugene F. Jennings, Star Number 11158, be discharged from the Chicago Police Department.

TERRYG. HILLARD Superintendent of Police

Approved As To Form:

ANGELA C. THOMAS

**Deputy Corporation Counsel**