

## CHARGES

Police Officer Jay Ramirez, Star Number 19766, 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 conduct or action taken to use the official position for personal gain or influence.
- Rule 14: Making a false report, written or oral.
- Rule 48: Soliciting or accepting any gratuity, or soliciting or accepting a gift, present, reward, or other thing of value for any service rendered as a Department member, or as a condition for the rendering of such service, or as a condition for not performing sworn duties.

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## SPECIFICATIONS

1. Police Officer Jay Ramirez, Star Number 19766, is charged with violating Rule 1, "Violation of any law or ordinance," in the following instance:

- Count I: In or about September 2001, Officer Ramirez committed the offense of Bribery in that he agreed to accept a service from Paul Geannopulos, namely, the design of a website, knowing that the service was promised with the intent to cause Officer Ramirez to falsely arrest Paul Geannopulos' estranged wife, Elizabeth Geannopulos, in violation of 720 ILCS 5/33-1.
- Count II: In or about September 2001, Officer Ramirez committed the offense of Conspiracy to Commit Unlawful Restraint in that he, with the intent to commit Unlawful Restraint, agreed with Paul Geannopulos to commit Unlawful Restraint and committed an act in furtherance of the agreement by detaining Elizabeth Geannopulos without lawful authority, in violation of 720 ILCS 5/8-2.
- Count III: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez committed the offense of Official Misconduct in that he knowingly performed an act which he knew he was forbidden by law to perform by conspiring with Paul Geannopulos to falsely arrest Elizabeth Geannopulos, unlawfully planting cocaine in Elizabeth Geannopulos' vehicle and /or falsely arresting Elizabeth Geannopulos, in violation of 720 ILCS 5/33-3.

- Count IV: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez committed the offense of Official Misconduct in that in his official capacity and with intent to obtain a personal advantage for himself and /or Paul Geannopulos, he performed an act in excess of his lawful authority by falsely arresting Elizabeth Geannopulos, in violation of 720 ILCS 5/33-3.
- Count V: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez committed the offense of Unlawful Restraint in that he knowingly detained Elizabeth Geannopulos without lawful authority, in violation of 720 ILCS 5/10-3.
- Count VI: On or about 26 September 2001, at or near the 13<sup>th</sup> District, 937 North Wood Street, Chicago, Illinois, Officer Ramirez committed the offense of Disorderly Conduct in that he caused a report to be transmitted that Elizabeth Geannopulos committed the offense of Possession of a Controlled Substance, knowing that there was no reasonable ground for believing that the offense was committed, in violation of 720 ILCS 5/26-1.
- Count VII: On or about 26 September 2001, at or near the 13<sup>th</sup> District, 937 North Wood Street, Chicago, Illinois, Officer Ramirez committed the offense of Perjury in that he falsely stated under affirmation in an arrest report that he found suspect cocaine in Elizabeth Geannopulos' vehicle, in violation of 720 ILCS 5/32-2.

2. Police Officer Jay Ramirez, Star Number 19766, 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 the following instance:

- Count I: In or about September 2001, Officer Ramirez agreed to accept a service from Paul Geannopulos, namely, the design of a website, knowing that the service was promised with the intent to cause Officer Ramirez to falsely arrest Paul Geannopulos's estranged wife, Elizabeth Geannopulos.
- Count II: In or about September 2001, Officer Ramirez conspired with Paul Geannopulos to falsely arrest Elizabeth Geannopulos.
- Count III: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez planted cocaine in Elizabeth Geannopulos' vehicle.
- Count IV: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez falsely arrested Elizabeth Geannopulos.
- Count V: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street

in Chicago, Illinois, Officer Ramirez knowingly detained Elizabeth Geannopulos without lawful authority.

- Count VI: On or about 26 September 2001, at or near the 13<sup>th</sup> District, 937 North Wood Street, Chicago, Illinois, Officer Ramirez caused a report to be transmitted that Elizabeth Geannopulos committed the offense of Possession of a Controlled Substance, knowing that there was no reasonable ground for believing that the offense was committed.
- Count VII: On or about 26 September 2001, at or near the 13<sup>th</sup> District, 937 North Wood Street, Chicago, Illinois, Officer Ramirez falsely stated under affirmation in an arrest report that he found suspect cocaine in Elizabeth Geannopulos' vehicle.
- Count VIII: On or about 11 March 2003, before a Cook County Grand Jury, Officer Ramirez was indicted on counts of Bribery, Conspiracy, Official Misconduct, Unlawful Restraint, Perjury and False Report of an Offense, all relating to his false arrest of Elizabeth Geannopulos on 26 September 2001.

3. Police Officer Jay Ramirez, Star Number 19766, is charged with violating Rule 4, "Any conduct or action taken to use the official position for personal gain or influence," in the following instances.

- Count I: In or about September 2001, Officer Ramirez agreed to accept a service from Paul Geannopulos, namely, the design of a website, knowing that the service was promised with the intent to cause Officer Ramirez to falsely arrest Paul Geannopulos' estranged wife, Elizabeth Geannopulos.
- Count II: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez, in his official capacity and with intent to obtain a personal advantage for himself, falsely arrested Elizabeth Geannopulos.

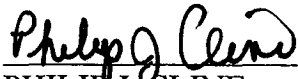
4. Police Officer Jay Ramirez, Star Number 19766, is charge with violating Rule 14, "Making a false report, written or oral," in the following instances:

- Count I: On or about 26 September 2001, at or near the 13<sup>th</sup> District, 937 North Wood Street, Chicago, Illinois, Officer Ramirez caused a report to be transmitted that Elizabeth Geannopulos committed the offense of Possession of a Controlled Substance, knowing that there was no reasonable ground for believing that the offense was committed.
- Count II: On or about 26 September 2001, at or near the 13<sup>th</sup> District, 937 North Wood Street, Chicago, Illinois, Officer Ramirez falsely stated under affirmation in an arrest report that he found suspect cocaine in Elizabeth Geannopulos' vehicle.

5. Officer Jay Ramirez, Star Number 19766, is charged with violating Rule 48, "Soliciting or accepting any gratuity, or soliciting or accepting a gift, present, reward, or other thing of value for any service rendered as a Department member, or as a condition for the rendering of such service, or as a condition for not performing sworn duties," in the following instances:

Count I: In or about September 2001, Officer Ramirez agreed to accept a service from Paul Geannopulos, namely, the design of a website, knowing that the service was promised with the intent to cause Officer Ramirez to falsely arrest Paul Geannopulos' estranged wife, Elizabeth Geannopulos.

Count II: On or about 26 September 2001, at or near Ogden Avenue and Monroe Street in Chicago, Illinois, Officer Ramirez, in his official capacity and with intent to obtain a personal advantage for himself, falsely arrested Elizabeth Geannopulos.



PHILIP J. CLINE

Superintendent of Police

Approved As To Form:



KERRY JEWELL

Assistant Corporation Counsel