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March 2, 2025

City of Chicago  
121 N. LaSalle Street  
Chicago, IL 60602

Chicago Fire Department  
3510 S. Michigan Ave.  
Chicago, IL 60653

**RE: Preservation of Evidence - Pending Lawsuit for Illegal Vehicle Searches on February 27-28, 2025 – Litigation Hold Letter**

Via E-Mail:

[Monica.Lowe@cityofchicago.org](mailto:Monica.Lowe@cityofchicago.org); [Cicely.Porter@cityofchicago.org](mailto:Cicely.Porter@cityofchicago.org); [brian.casey@cityofchicago.org](mailto:brian.casey@cityofchicago.org); [Evan.Haim@cityofchicago.org](mailto:Evan.Haim@cityofchicago.org)

This letter serves as a formal demand that the City of Chicago and the Chicago Fire Department preserve all evidence relating to the searches of personal vehicles that occurred on February 27-28, 2025, by various members of Internal Affairs and the Command Staff of the Chicago Fire Department and/or various unnamed officials of the Chicago Fire Department and/or City of Chicago. A lawsuit may be forthcoming regarding these incident(s). You are hereby instructed to immediately take all necessary steps to preserve, protect, and maintain all records and information, in any form, that may be relevant to this matter, including but not limited to:

1. All video footage from body cameras, dashboard cameras, and surveillance cameras in the vicinity of the searches.
2. All written reports, notes, and communications related to the searches.
3. Any physical evidence collected during the searches.
4. Dispatch logs and radio communications surrounding this incident from February 27-28, 2025.

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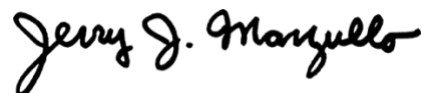
5. Any phone call records, any text messages, any e-mails, or any communication in any medium made by and between any officials of the Chicago Fire Department and/or the City of Chicago involved in these searches.

This preservation request extends to all electronic data, including emails, text messages, and other digital communications related to the incidents. Please ensure that all auto-delete functions are suspended for relevant data and that no potentially relevant information is destroyed, altered, or removed. To that end:

1. Order the applicable officials to NOT delete or, if applicable, suspend deletion, overwriting, or any other destruction of electronic information relevant to this dispute that is under your control. This includes electronic information wherever it is stored – at your workstation, on a laptop, or at home. It includes all forms of electronic communication – e.g., e-mail, word processing, calendars, voice messages, videos, photographs, and information in your PDA. This electronic information must be preserved so that it can be retrieved at a later time. The information must be preserved in its original electronic form so that all information contained within it, whether visible or not, is also available for inspection.
2. Similarly, have them preserve any new electronic information that is generated after you receive this letter that is relevant to this dispute.
3. Preserve any hard copy under their control.

Failure to comply with this preservation request may result in sanctions for spoliation of evidence. This is an essential legal duty, and failure to follow these instructions may result in legal consequences. If you have any questions regarding the scope of this request, please contact me immediately.

Sincerely,



Jerry J. Marzullo, Esq.  
Counsel for IAFF-AFFI Local 2

Cc: CFFU Local 2