



Board of Fire and Police
P.O. Box 219
Rockford, IL 61105-0219

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Williams McCarthy LLP

Dear Commissioners.

Based on complaints containing allegations of violations of the Rules and Regulations of the Rockford Police Department, filed against Chief Chester Epperson and herein served to the Fire and Police Commissioners through their Representative, we respectfully request the following actions, which are in keeping with the past practices of the department with all employees placed on similar status: 1) that Chief Chester Epperson be immediately placed on administrative leave; 2) that he be required to remain in his residence from 0800 to 1700 hours Monday through Friday, except having all administrative holidays off and an hour lunch between 1100 and 1300 hours for lunch; 3) that Chief Chester Epperson be relieved of possession of his department issued firearm and be prohibited from carrying any firearm in his capacity as a police officer; 4) that Chief Chester Epperson be required to surrender any and all City of Rockford Police Department equipment; 5) that Chief Chester Epperson be prohibited from working any police-related employment either for this department or any public or private employer; and 6) That Chief Chester Epperson remain on administrative leave pending the final outcome of the investigation and any subsequent discipline proceeding.

Further charges may be rendered against him regarding his conduct as Chief of Police.

Respectfully Submitted,

Aurelio DeLaRosa, President
Police Benevolent and Protective Association, Unit 6

In The Matter Of:)
)
Rockford Police Chief)
Chester Epperson)

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Williams McCarthy LLP

Affidavit in Support of the Uniform Peace Officer Disciplinary Act

50 ILCS 725/3.8(b)

After first being duly sworn on oath I, Bruce Brannum do depose and state the following:

That I am filing an Internal Discipline Complaint Form with the Rockford BOARD OF FIRE AND POLICE COMMISSION that alleges that the City of Rockford Police Chief Chester Epperson has violated ordinances of the City of Rockford, laws of the State of Illinois, or laws of the United States of America including violations of the Rockford Police Department Policy, Orders, Rules and/or Regulations and Violations of Rules of Conduct of the Rockford Police Department.

Count 1

That on or about June 6th, 2006, Rockford Police Chief Chester Epperson violated the RULES OF CONDUCT OF THE ROCKFORD POLICE DEPARTMENT, SECTION III, ACT 7, by using COARSE AND DISRESPECTFUL LANGUAGE TOWARDS ANOTHER OFFICER OR OTHER PERSON. This violation occurred while Rockford Police Chief Chester Epperson was serving an internal discipline on Rockford Police Detective Jeffrey Stovall. During the discipline, Rockford Police Chief Chester pointed and waived his right index finger in Detective Jeffrey Stovall's face and demanded that he call him Chief, not Chet. This action occurred after Detective Jeffrey Stovall asked to speak freely to Chief Chester Epperson during this discipline meeting, and was witnessed by Rockford Police Deputy Chief Greg Lindmark and then Rockford Police Sgt. Doug Block.

Count 2

That on or about January 2007, Rockford Police Chief Chester Epperson violated the RULES OF CONDUCT OF THE ROCKFORD POLICE DEPARTMENT, SECTION III, ACT 6, by

allowing the MALTREATMENT OF ANY PERSON WITHIN THE OFFICER'S SCOPE OF AUTHORITY, he allowed Rockford Police Sgt. Todd McLester to be reprimanded, in that the K-9 Unit was taken away from his authority as punishment. This discipline stemmed from Sgt. Todd McLester supporting his K-9 officers, Officers Durk Garcia and Duane Johnson when they were out of Rockford sub-beat 66, to back up officers (an Illinois State Police Officer) or conduct traffic stops. Rockford Police Deputy Chief Michael Booker disciplined Sgt. McLester by taking the K-9 unit away from a veteran K-9 handler and transferring the duties to then Rockford Police Lt. Steve Johnson, who had no knowledge of K-9's. Rockford Police Chief Chester Epperson condoned Deputy Chief Booker's decision to transfer the K-9 unit away from Sgt. McLester and allowed this discipline to be handed down.

Count 3

That on or about September 18th, 2007, Rockford Police Chief Chester Epperson violated the RULES OF CONDUCT OF THE ROCKFORD POLICE DEPARTMENT, SECTION III, ACT 8, in that Chief Chester Epperson SPOKE SLIGHTINGLY OF THE RACE, NATIONALITY, RELIGION, OR CREED OF ANY PERSON. This charge stems from remarks Chief Chester Epperson made to nine detectives (Kevin Gulley, Bob Reffett, Eric Harris, Shawn Ross, Erik Swenson, Torry Regez, Mike McDonald, Brian Shimaitis, and Mark Jacobi) during a "breakfast meeting" held in the Rockford Police Chief's Conference room. During this meeting, Rockford Police Chief Chester Epperson made remarks indicating, "if you (detectives) get Detective Jason Bailey to resign, I will offer amnesty to the remainder of the officers facing discipline in front of the Fire and Police Commission". Chief Epperson later made comment that "if you are not Mexican, you may not know what amnesty means".

Count 4

That since Chief Chester Epperson was appointed Chief of the Rockford Police Department on April 11th, 2006, he has routinely violated the RULES AND REGULATIONS OF THE ROCKFORD POLICE DEPARTMENT, particularly SECTION II, B, PARAGRAPH #4, which states COMMANDERS AND SUPERVISORS SHALL SET A GOOD EXAMPLE FOR ALL SUBORDINATE OFFICERS, PROVIDING LEADERSHIP AND GUIDANCE IN DEVELOPING LOYALTY AND DEDICATION FROM THE DEPARTMENT. This charge stems from the fact morale is at an all time low. The Chief's "do what I say" and "it's my way or the Highway" or "you're either with this administration or you're against it" attitude has

caused the morale within the Rockford Police Department to plummet. On September 14th, 2007, 98% of the Rockford Police Officers voted they have no confidence in Chief Chester Epperson's leadership abilities. The Rockford Police Officers have conducted informational pickets/marches expressing their lack of confidence in Chief Chester Epperson's leadership and guidance. On November 13th, 2007, the PB&PA #6 called for Chief Epperson's resignation. Yet, Chief Chester Epperson continues to lead the department in the way he has since he was appointed Chief.

Count 5

That on October 27th, 2006 Rockford Police Chief Chester Epperson violated the RULES AND REGULATIONS OF THE ROCKFORD POLICE DEPARTMENT, SECTION II, B, PARAGRAPH #7, which states COMMANDERS AND SUPERVISORS WILL PROMOTE HARMONIOUS RELATIONSHIPS BETWEEN ELEMENTS OF THE DEPARTMENT, WITH OTHER CITY DEPARTMENTS AND WITH OTHER LAW ENFORCEMENT AGENCIES, BY PROPER EXCHANGE OF INFORMATION AND SERVICES ACCORDING TO POLICY AS DETERMINED BY THE CHIEF OF POLICE. Rockford Police Chief Chester Epperson violated this rule when he publicly criticized the Federal Bureau of Investigations (FBI) SWAT Team for their actions in conducting a dynamic entry into a residence located at 627 Chapin Court, Rockford, Illinois, during a kidnapping investigation. The actions of the FBI SWAT Team saved the victim and resulted in the arrest of six men involved in the kidnapping. These men originally kidnapped the victim from Virginia and were transporting him to Colorado.

Count 6

That on or about December 8th, 2006 Rockford Police Chief Chester Epperson violated the RULES AND REGULATIONS OF THE ROCKFORD POLICE DEPARTMENT, SECTION II, B, PARAGRAPH #7, by again publicly criticizing the Federal Bureau of Investigations (FBI) regarding the arrest of terrorist suspect Derek Shareef. After the FBI arrested Derek Shareef, Chief Chester Epperson publicly criticized the FBI for not providing him with information concerning their (FBI) investigation and his (Chief Epperson's) lack of knowledge of the arrest.

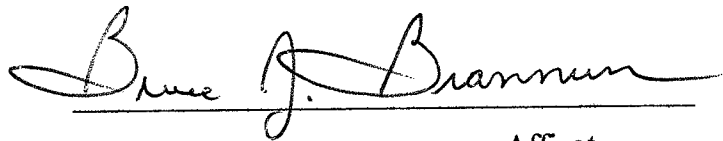
Count 7

That on or about September 25th, 2007, Rockford Police Chief Chester Epperson again violated the RULES AND REGULATIONS OF THE ROCKFORD POLICE DEPARTMENT, SECTION II, B, PARAGRAPH #7, by refusing to allow members of the Rockford Police

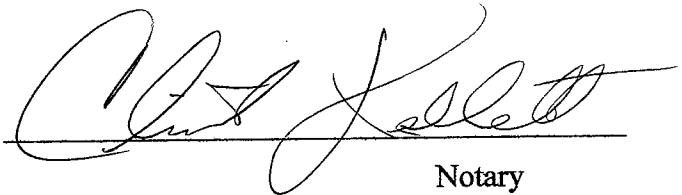
Department in assisting the Immigration and Customs Enforcement (ICE) in locating and arresting eight suspected sexual predators in the Rockford area. These ICE Agents were unfamiliar with the city of Rockford and due to Chief Epperson's decision to not assist the Federal Agents in this "Operation Predator" sweep, because he (the Chief) "wanted to be more sensitive to the Hispanic Community", potentially placed these federal agents at risk.

That I, Bruce Brannum, affirm under oath that this affidavit is true and factual, under the penalty of filing a false police report or perjury. Furthermore, this affiant prays that the members of the FIRE AND POLICE COMMISSIONERS will investigate these allegations thoroughly and take appropriate action.

SUBSCRIBED AND SWORN TO before me 5th day of December, 2007.



Affiant



Notary

Notary Seal:

