



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

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DEC - 5 2007

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.

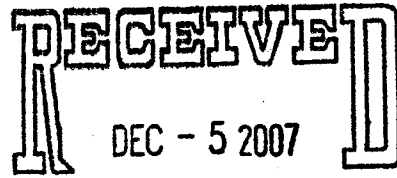
Respectfully Submitted,

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

County of Winnebago)

)

State of Illinois)



Williams McCarthy LLP

I, Robert F. Redmond, do state the following:

That I am a Rockford Police Officer and have been so employed for the past twenty-three years. I am currently assigned to the rank of sergeant in the Investigative Services Bureau. My primary duties include the supervision of ten detectives investigating youth and sex crimes, and the supervision of the Rockford Police Hostage Negotiation Team.

That on December 5th, 2007, I am filing a formal complaint against Rockford Police Chief Chester Epperson for the violation of felony offenses.

Count 1

Perjury

That on December 1st, 2007, during the discipline hearing of Jason Bailey, Rockford Police Chief Chester Epperson testified under oath, whereby law such oath or affirmation is required, knowingly made a false statements. During Rockford Police Chief Epperson's testimony, Chief Epperson knowingly gave false statements on at least two occasions during his testimony, in violation of Chapter 720 ILCS, Section 5, Act 32-2.

Count 2

Eavesdropping

That on March 2nd, 2007, Rockford Police Chief Chester Epperson, knowingly and intentionally used an eavesdropping device for the purpose of hearing and viewing a conversation with Jason Esterbrook without the consent of Jason Esterbrook, in violation of Chapter 720, Act 5, Section 14(2)(1)(A).

Count 3

Eavesdropping

That on May 27, 2007, Rockford Police Chief Chester Epperson, knowingly and intentionally used an eavesdropping device for the purpose of hearing and viewing a conversation with Steven Parham without the consent of Steven Parham, in violation of Chapter 720, Act 5, Section 14(2)(1)(A).

Count 4

Official Misconduct

That on December 1st, 2007, Rockford Police Chief Chester Epperson, being a public officer, while acting in his official capacity, knowingly performed an act which he knew was forbidden by law to perform in that he committed perjury, in violation Chapter 720 ILCS, Section 5, Act 32-2, this is in violation of Chapter 720 ILCS, Act 5, Section 33-3(b).

Count 5

Official Misconduct

That on March 2nd, 2007, Rockford Police Chief Chester Epperson, being a public officer, while acting in his official capacity, knowingly performed an act which he knew was forbidden by law to perform in that he violated the eavesdropping statute, in violation Chapter 720 ILCS, Act 5, Section 14(2)(1)(A), this is in violation of Chapter 720, Act 5, Section 33-3(b).

Count 6

Official Misconduct

That on May 27th, 2007, Rockford Police Chief Chester Epperson, being a public officer, while acting in his official capacity, knowingly performed an act which he knew was forbidden by law to perform in that he violated the eavesdropping statute, in violation Chapter 720 ILCS, Act 5, Section 14(2)(1)(A), this is in violation of Chapter 720, Act 5, Section 33-3(b).

WHEREFORE, I respectfully request that a hearing be held in regard to this complaint.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Robert F. Redmond".

Robert F. Redmond

Date Signed: December 5th, 2007