

**IN THE CIRCUIT COURT OF COOK COUNTY  
CHANCERY DIVISION  
STATE OF ILLINOIS**

**CHICAGO JOHN DINEEN LODGE # 7,** )

)

)

Petitioners, )

)

v. )

)

**CITY OF CHICAGO, DEPARTMENT of** )

**POLICE, BRANDON JOHNSON, in his** )

**Official Capacity as MAYOR, and Larry** )

**Snelling, in his Official Capacity as** )

**Superintendent of the Chicago Police** )

**Department, and the Chicago City Council,** )

)

)

**Respondents,** )

)

**2024CH00093**

**Case No. 2023 CH**

**Judge**

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**VERIFIED COMPLAINT TO CONFIRM INTEREST ARBITRATION AWARD**

Petitioner Chicago John Dineen Lodge No. 7 (“the Lodge”), by and through it’s attorneys complain of Respondents, City of Chicago, Chicago Police Department (“the City”), Brandon Johnson, Mayor of the City of Chicago, Larry Snelling the Superintendent of the Department of Police and the City Council of the City of Chicago and petition this Court to confirm an arbitration award pursuant to the Illinois Uniform Arbitration Act, 710 ILCS 5/1, et seq. In support of this petition, the Petitioner states and allege as follows:

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## **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to Section 16 of the IPLRA, 5 ILCS 315/8, 16, and Section 16 of the Illinois Uniform Arbitration Act, (“UAA”), 710 ILCS 5/16.

2. This Court has subject matter jurisdiction over this justiciable matter pursuant to Ill. Const. Art. VI, § 9, as the claims arise under Illinois law.

3. Venue is proper in this Court pursuant to Section 17 of the UAA, as the relevant arbitration hearing was held in Chicago, Cook County, Illinois.

## **NATURE OF THE ACTION**

4. This is a petition to confirm and enforce a Supplemental and a Final Opinion and Award in an interest arbitration proceeding issued by the parties’ Dispute Resolution Panel, on October 19, 2023, and the Supplemental Final Opinion and Award issued on January 4, 2024. Exhibits 1 and 2.

## **PARTIES**

5. Petitioner, Chicago John Dineen Lodge No. 7, is a “labor organization” as that term is defined in the Illinois Public Labor Relations Act (“IPLRA”), 5 ILCS § 315/3(i) and is the exclusive collective bargaining representative for Chicago Police Officers below the rank Sergeant.

6. Petitioner Lodge 7 has its principal place of business in the City of Chicago, Cook County, Illinois.

7. Respondent, City of Chicago, Chicago Police Department is a “public employer” as that term is defined in the IPLRA, 5 ILCS §315/3(o). As such, the City employs members of a bargaining unit that is exclusively represented by the Lodge.

8. Respondent Brandon Johnson is the elected Mayor of the City of Chicago, and this action is filed against him in his official capacity as the Mayor of the City of Chicago.

9. Respondent Larry Snelling is the Superintendent of the Department of Police of the City of Chicago, and this action is filed against him in his official capacity as the Superintendent of the Department of Police of the City of Chicago.

10. The Respondent City Council of the City of Chicago consists of elected alderpersons who represent each of the 50 wards of the City of Chicago.

11. The Respondent City is an incorporated municipality under the Illinois Municipal Code, 65 ILCS 5/1-1-2(1) and 5/1-1-3. It operates and has its principal place of business in Cook County.

**SUIT TO CONFIRM AND ENFORCE INTEREST ARBITRATION AWARD**

12. Petitioner re-alleges and incorporates by reference herein Paragraphs 1-11 as if fully alleged herein.

13. At all times relevant to this action, the City and the Lodge have been parties to a collective bargaining agreement (“CBA”), the original duration which is July 1, 2012, to June 30, 2017. A true and accurate copy of pertinent portions of the parties’ CBA is attached as Exhibit 1.

14. Pursuant to the parties’ agreement, the terms of the CBA have remained in full force and effect through the present date as the parties have been engaged in negotiations and an interest arbitration proceeding for a successor agreement since at least June 30, 2017. (Exhibit 3, Section 28.2)

15. The parties commenced their collective bargaining negotiations in or about October 2017, and those negotiations culminated in final and binding interest arbitration.

17. The interest arbitration tri-partite panel was comprised of neutral Arbitrator Edwin Benn, Lodge Appointee John Catanzara and the City Appointee Cicely Porter.

18. The Final Opinion and Award (“Award”) was issued on October 19, 2023. Exhibit 1. The Award ordered the parties to include in their collective bargaining agreement an option for bargaining unit members to submit grievances protesting suspensions in excess of 365 days and separations to final and binding arbitration or to the Chicago Police Board.

19. The Final Opinion and Award also incorporated the parties’ tentative agreements reached on all other outstanding issues. A true and correct copy of the Final Opinion and Award is attached as Exhibit 1.

20. On December 13, 2023, the Respondent City Council rejected that portion of the Final Opinion and Award awarding an option to submit grievances protesting suspensions in excess of 365 days and separations to final and binding grievance arbitration. A true and correct copy of the Ordinance rejected the Final Opinion and Award is attached as Exhibit 4.

21. Also, on December 13, 2023, the Respondent City Council adopted all other portions of the Final Opinion and Award. A true and correct copy of the Ordinance adopting all other portions of the Final Opinion and Award is attached as Exhibit 5.

22. Pursuant to the parties’ CBA, the sole issue rejected by the City Council – was the right to final and binding grievance arbitration over grievances protesting suspensions greater than 365 days and separations, and subsequently the parties met again with the tri-partite interest arbitration panel.

23. A supplemental Final Opinion and Award was issued by the tri-partite panel on January 4 2024, which once again ordered the parties to include in their collective bargaining agreement an option for bargaining unit members to submit grievances protesting suspensions in excess of 365 days and separations to final and binding arbitration or to the Chicago Police Board. A true and correct copy of the Supplemental Final Opinion and Award is attached as Exhibit 2.

24. The Tri-Partite Panel acted within the scope of its authority in issuing the Final Opinion and Award and the Supplemental Final Opinion and Award.

25. The Final Opinion and Award and the Supplemental Final Opinion and Award drew their essence from the Parties' collective bargaining agreement, the statutory requirements of the IPLRA and the mandate of the Illinois Constitution.

26. Pursuant to 710 ILCS 5/11 and 5/14 of the Illinois Uniform Arbitration Act, the Lodge hereby applies for confirmation of the Award and entry of a judgment in conformity therewith.

**WHEREFORE**, the Lodge requests this Court to issue an Order as follows:

- A. Enter an order and judgment confirming and enforcing the Arbitration Award issued by the interest arbitration panel on October 19, 2023;
- B. Enter an order and judgment confirming and enforcing the Arbitration Award issued by the interest arbitration panel on January 4, 2024 and October 19, 2023;
- C. Order Respondents to comply with the Interest Arbitration Awards issued on October 19, 2023 and January 4, 2024;
- D. Enter an order enjoining Respondents from their continued failure and refusal to comply with the Arbitration Award issued October 19, 2023 and January 4, 2024; and
- E. Grant all other relief the Court finds appropriate, including awarding attorneys' fees incurred in this confirmation and enforcement process.

/s/ Joel A' D'Alba

Joel A. D'Alba

/s/ Margaret Angelucci

Margaret Angelucci

/s/ Matt Pierce

Matt Pierce

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*Attorneys for Chicago John Dineen  
Lodge No.7*

Date: January 4, 2024

**VERIFICATION**

Pursuant to Section 2-605 of the Illinois Code of Civil Procedure, 735 ILCS §5/2-605, the undersigned verifies that the factual statements set forth in the foregoing Verified Complaint To Confirm Interest Arbitration Award are true and correct, except as to matters therein stated to be on information and belief and as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true.

1/4/24  
Date

*John J. Catanzara Jr.*  
John Catanzara, Jr.