CIVILIAN OFFICE OF POLICE ACCOUNTABILITY

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September 8, 2026

Mr. Max A. Caproni
Executive Director, Chicago Police Board
30 North LaSalle Street, Suite 1220
Chicago, Illinois 60602

Via Email

RE: Request for Review, Log #2022-5227, Officer Paul Srodulski, # 18452

Dear Mr. Caproni,

Pursuant to Municipal Code of Chicago § 2-78-130 and Chicago Police Board Rules of Procedure § VI, this letter constitutes COPA's Request for Review of the non-concurrence issued by the Superintendent of the Chicago Police Department ("CPD") in Log #2022-0005227.[1]

For the reasons set forth below and in COPA's Final Summary Report ("FSR") dated February 29, 2024, there is a compelling legal and evidentiary basis to support COPA's disciplinary recommendation for Officer Paul Srodulski ("Officer Srodulski").

I. BACKGROUND

A. Relevant Factual Background[2]

On December 9, 2022, COPA received a complaint from [redacted]([redacted] alleging that, on August 28, 2022, Officer Srodulski slammed him to the ground and battered him during an arrest in the vicinity of 9500 South Ewing Avenue. Officer Srodulski was on duty responding to drag-racing and car-club activity in the area. As [redacted] began to climb onto a marked squad vehicle occupied by other officers, Officer Srodulski approached from behind and took [redacted] to the ground.[3]

[redacted] was transported first to the 004th District station and then to [redacted] Hospital. Hospital records document that [redacted] sustained facial lacerations and the loss of three teeth. A maxillofacial CT confirmed three missing maxillary incisors with fractures of the alveolar sockets, together with soft-tissue swelling of the upper lip.[4]

Following its investigation, COPA sustained the allegation that Officer Srodulski slammed [redacted] to the ground without justification, in violation of Rules 2, 3, 5, 6, 8, 9, and 10. COPA recommended a ten-day suspension.[5]

[1] As required by the Police Board Rules of Procedure, enclosed are copies of COPA's final summary report, CPD's non-concurrence letter (Non-Concurrence), and the certificate of meeting and service.
[2] A more detailed factual summary can be found in the FSR.
[3] Att. 59, FSR; Att. 51, Statement of Officer Paul Srodulski, pg. 11, lns. 6-8, pg. 16, lns 1-13.
[4] Att. 54, [redacted] Medical Records.
[5] Att. 59, at 5.

B. Disputed Findings and Recommendations

CPD does not concur with COPA's Sustained finding and instead recommends a finding of Unfounded.[6] The Superintendent advances three principal arguments. First, he contends that Officer Lindgren's BWC shows Officer Srodulski pulling [redacted] off the squad car, attempting to turn him away, and then leaning backward and losing his balance, such that Officer Srodulski and [redacted] fell to the ground unintentionally rather than by way of a deliberate takedown. Second, he relies on Officer Srodulski's statement to COPA that "I did not slam him on the ground. I just pulled him off the car," and emphasizes that the statement carries the status of an official CPD report subject to Rule 14. Third, he relies on a statement [redacted] is reported to have made to Lieutenant Unizycki that "the Officer tackled [me] but they didn't use excessive force on me either."

C. Applicable Laws and Department Policies

COPA sustained the allegation as an excessive-force violation. General Order G03-02 governs de-escalation, response to resistance, and use of force. CPD's stated highest priority is the sanctity of human life, and G03-02 provides that a member may use only force that is objectively reasonable, necessary, and proportional under the totality of the circumstances, to ensure the safety of CPD member or a third person, stop an attack, make an arrest, control a person, or prevent escape.[7] The amount and type of force used must be proportional to the threat, actions, and level of resistance a person offers. The reasonableness of an officer's force is assessed objectively, from the perspective of a reasonable officer on the scene, and does not turn on the officer's subjective intent or after-the-fact characterization of the officer's own conduct.[8]

General Order G03-02-01 describes CPD's available responses to resistance and noncompliance, and indicates that CPD members must use de-escalation techniques to prevent or reduce the need for force, unless doing so would place a person or CPD member in immediate risk of harm, or de-escalation techniques would be clearly ineffective under the circumstances at the time.[9]

COPA's findings are governed by defined standards of proof. A Sustained finding is appropriate where the allegation is supported by a preponderance of the evidence. An Unfounded finding is appropriate only where it is determined, by clear and convincing evidence, that the allegation is false or not factual. An Exonerated finding, by contrast, applies where it is determined by clear and convincing evidence that the conduct described in the allegation occurred but was lawful and proper.[10]

II. ANALYSIS

A. The Evidence Shows the Takedown Was Intentional and not Objectively Reasonable.

First, COPA does not dispute the permissibility of Officer Srodulski physically removing [redacted] from the top of the squad car. However, the video footage does not appear to show a loss of balance, but a

[6] Att. 61, Superintendent's Non-Concurrence with Findings and Penalty Recommendation, dated May 22, 2024.
[7] Att. 53, G03-02(III)(B), De-Escalation, Response to Resistance, and Use of Force.
[8] *Plumhoff v. Rickard*, 572 U.S. 765, 775 (2014); *see also Graham v. Connor*, 490 U.S. 386, 396–97 (1989).
[9] Att. 52, G03-02-01, Response to Resistance and Force Options.
[10] Att. 51, Appendix B, Definition of COPA's Findings and Standards of Proof. Because an Unfounded finding is only appropriate where the conduct did not occur, COPA contends that that Superintendent's finding of Unfounded is foreclosed by the evidence and Officer Srodulski's admission that he pulled [redacted] off the squad car and continued to the ground. COPA further contends that an Exonerated finding is inappropriate, as the evidence is not clear and convincing that Officer Srodulski's takedown was lawful and proper, and it is in fact the main issue in dispute.

takedown resulting in Officer Srodulski fully mounted onto [redacted] who was propelled head-first onto a paved surface with force sufficient to knock out three of his teeth and fracture the sockets that held them.[11]

[redacted] did not display any signs of physical resistance, and the video footage does not show [redacted] even reacting to police presence prior to the takedown. This aligns with [redacted] statement to Lieutenant Unizycki that he was not attempting to resist the officers and was not paying attention.[12] [redacted] actions were irresponsible and dangerous to himself, but a reasonable and proportional response was available to Officer Srodulski, who instead drove [redacted] to the ground head-first, ensuring that he was injured, rather than facing the risk of injury.

Even if Officer Srodulski's takedown was an unintentional fall, this merely indicates that the application of force was not controlled or proportional. Officer Srodulski claimed that [redacted] "continued to the ground" upon being pulled off the police vehicle, but the video footage plainly shows Officer Srodulski lifting up [redacted] after pulling him from the vehicle, and then rotating the full weight of his body onto [redacted] The video evidence is inconsistent with any interpretation that [redacted] merely continued to the ground. The reasonableness of an officer's use of force is assessed objectively according to the standard of a reasonable officer, and an application of excessive force does not suddenly become objectively reasonable when an officer claims the force used was unintentional.

Second, the Superintendent's non-concurrence relies on Officer Srodulski's statement that he "did not slam" [redacted] but "just pulled him off the car." The non-concurrence concludes that Officer Srodulski's statement should be relied on because he understood that any intentional falsification of his answers would result in a Rule 14 violation and potential separation. The existence of a rule prohibiting false statements, Rule 14, is not evidence that an officer's self-serving claim is true. Moreover, "I did not slam him" is Officer Srodulski's conclusion about the very question in dispute, not independent evidence bearing on it.

Finally, the Superintendent also relies on [redacted] statement to Lieutenant Unizycki that CPD did not use excessive force as evidence that the force was not excessive. The standard, however, is an objective one based on the perspective of a reasonable officer on the scene, not the perspective of an intoxicated teenager.[13] [redacted] account does not supersede COPA's objective analysis, supported by body-worn cameras and medical records.[14]

III. CONCLUSION

For these reasons, COPA maintains that the Superintendent has failed to meet his burden of showing that COPA's findings and recommendation in this matter are unreasonable. Accordingly, COPA respectfully requests that the Chicago Police Board reject the Superintendent's non-concurrence in this matter and accept COPA's findings and recommendation in full.

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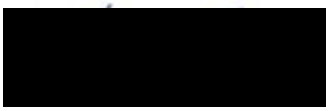
[11] Officer Srodulski also did not claim his fall was unintentional when he spoke to COPA. His reference to falling can fairly be read to explain the natural consequence of forcefully pulling someone off a car. See Att. 51, pg. 19, lns. 2-7 ("Q. Okay. So when you pulled him off, did you guys go directly to the ground when you pulled him off? A. **I pulled him to me and then we continued to the ground**. So I went with him; so it wasn't a slamming motion up here to here. It was -- I pulled him toward me, and then we both fell to the ground.") (emphasis supplied).

[12] Att. 38, TRR, at 3.

[13] This is particularly true when [redacted] later contacted COPA to make a complaint about the conduct.

[14] The Superintendent claims that COPA never attempted to contact or interview [redacted] That statement is incorrect. [redacted] filed the complaint with COPA, communicated with COPA investigators several times, and provided medical records and images of his injuries. The case record reflects that COPA made several attempts to interview [redacted] but was not successful. See CMS Notes CO-0202798, CO-0210644, CO-1355044, CO-1355454, CO-1355478, CO-1355506, CO-1359013. In any event, COPA's inability to interview [redacted] is not evidence that the alleged misconduct did not occur. Body-worn cameras, medical records, and Officer Srodulski's own statement provide sufficient justification for COPA's sustained finding.

Respectfully,



Lakenya White
Chief Administrator
Civilian Office of Police Accountability