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OFFICE OF INSPECTOR GENERAL

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The City of Chicago's Implementation and Enforcement of the Gun Offender Registration Ordinance

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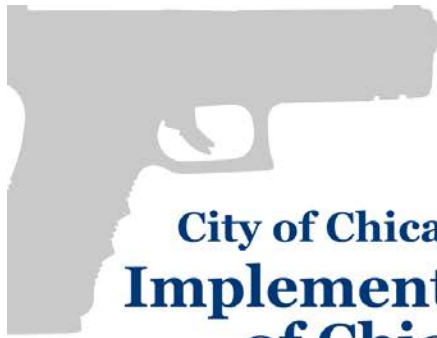
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Acronyms

BOP	Bureau of Patrol
CCDOC	Cook County Department of Corrections
CCSAO	Cook County State's Attorney's Office
CCL	Concealed Carry License
CLEAR	Citizen Law Enforcement Analysis and Reporting
CPD	Chicago Police Department
CRU	Criminal Registration Unit
DOL	Department of Law
FOID	Firearm Owners Identification
IDOC	Illinois Department of Corrections
LEADS	Law Enforcement Agencies Data System
MCC	Municipal Code of Chicago
OIG	Office of Inspector General
OPSA	Office of Public Safety Administration
U UW	Unlawful Use of a Weapon



City of Chicago Office of Inspector General Implementation and Enforcement of Chicago's Gun Offender Registration Ordinance

The Gun Offender Registration Ordinance requires all Chicago residents convicted of specific gun-related offenses to register with the Chicago Police Department (CPD).

The current registry is **incomplete and unreliable**, undermining its utility as a public safety tool.



Notification Issues

Some gun offenders may not be notified to register due to coordination issues between CPD and custodial institutions, and the range of qualifying convictions in the ordinance.

01



02

Registration Complications

Few locations, limited hours, and long lines have been barriers; CPD reported recent improvements such as indoor waiting areas.

Lack of Enforcement

CPD does not proactively enforce the ordinance, and the City rarely seeks penalties for violators.

03



OIG
recommends

Before devoting additional resources to enforcing the Gun Offender Registration Ordinance, the City should **evaluate the costs and benefits of administering the current ordinance**, where there is little evidence of its achieving its intended impact.

I | Executive Summary

The Public Safety section of the Office of Inspector General (OIG) conducted an inquiry into the City of Chicago's implementation and enforcement of the Gun Offender Registration Ordinance (the Ordinance). Initially passed in 2010 and amended in 2013, the Ordinance requires all Chicago residents who have been convicted of specific gun-related offenses to register with the Chicago Police Department (CPD or the Department). Per the Ordinance, CPD is responsible for notifying qualifying offenders of their duty to register, maintaining the public Gun Offender Registry, and enforcing registration requirements. The objectives of this inquiry were to describe the demographic profile and qualifying criminal offenses of the registrants on the Gun Offender Registry and to assess how effectively CPD and other involved agencies are fulfilling the mandates outlined in the Ordinance and provisions outlined in CPD policies, including providing notice to offenders and enforcing registration obligations.

As a result of this inquiry, OIG identified areas of concern regarding the current implementation and enforcement of the Gun Offender Registration Ordinance. First, CPD is unable to ensure that all qualifying individuals are provided written notice of their duty to register due to CPD's lack of procedural controls with partnering custodial institutions and broad offender eligibility criteria under the Ordinance. In fact, CPD has no way of ascertaining or subsequently providing notice of the duty to register to the full universe of qualifying gun offenders under the Ordinance. OIG also found that CPD's gun offender registration processes may have hampered efficient registration. The Ordinance requires individuals to register in person with CPD within five days of their receiving notice to register, and re-register annually for a total period of four years. However, CPD and the City have provided inconsistent and conflicting information on where and when to register. In addition, limited registration sites and operational hours have created barriers in the registration process for the large volume of registrants in Chicago. In response to the recommendations in this inquiry, CPD reported to OIG that since the time of analysis, it has taken actions to improve the experience for individuals waiting to register with CPD, such as by providing indoor waiting areas (see Management Response, Recommendation 10).

OIG additionally found that, despite processes outlined in CPD policy to conduct routine residency verification and proactive missions to register non-compliant individuals, CPD is not conducting either of these actions. Moreover, OIG found that CPD does not systematically ensure the accuracy or validity of registrant information and allows individuals to remain on the registry past their required four-year registration period, undermining the registry's overall usefulness and accuracy. Finally, OIG determined that the City is declining to pursue registration violations to the full extent allowed under the Ordinance, as the City's Department of Law (DOL) rarely seeks penalties for violators, instead dismissing charges should the individual come into compliance with the Gun Offender Registration Ordinance.

Supporters of the Ordinance have argued that the Gun Offender Registry can serve as a public safety tool, a resource for law enforcement, and a deterrent to crime. However, little evidence exists suggesting that the Ordinance or the registry has fulfilled these intended goals. In this report, OIG discusses the gaps that exist for notifying individuals of the registration requirement, inefficiencies in CPD's registration practices and lack of enforcement of the Ordinance, and makes recommendations to address the identified deficiencies—if, in fact, the City determines that the benefits that might be anticipated from robust enforcement of the Ordinance outweigh its costs. In response to this inquiry, the Mayor's Office committed to “evaluate the existing ordinance,” “define

collectable metrics,” and “determine whether and to what extent additional resources are necessary” (see Recommendations 1-3). CPD largely accepted OIG’s recommendations to improve its enforcement of the Ordinance (see Recommendations 4-15) and reported that it has begun reviewing relevant Department policies and public-facing information regarding the Gun Offender Registration Ordinance and is seeking to implement new software to be used as a registrant management tool.

II | Background

In 1982, the City Council and Mayor Jane Byrne passed a city ordinance that effectively banned the ownership of handguns by private citizens in Chicago. However, on June 28, 2010, the United States Supreme Court held in *McDonald v. City of Chicago* that the Second Amendment right to keep and bear arms was applicable to the States.¹ Subsequently, on July 2, 2010, then-Mayor Richard M. Daley called a special City Council meeting to repeal the original ordinance that McDonald et al. challenged and “to promptly pass an ordinance that provides for reasonable regulation of firearms in compliance with the rulings of the United States Supreme Court, but still is effective in protecting the public from the potentially deadly consequences of gun violence in [Chicago].”² This municipal action aimed to supplement Illinois law in order “to protect the City from the unique and heightened risk of firearm violence, especially handgun violence, endemic in densely populated urban areas.”³ Among the wide sweeping gun regulations passed in a unanimous vote by City Council was Municipal Code of Chicago (MCC) §8-26, “Gun Offender Registration Ordinance,” which requires Chicago residents convicted of specific offenses to register as gun offenders. In 2013, the Ordinance was amended to expand the list of qualifying convictions.

In support of its 2013 amendment, the primary sponsor, Alderperson Edward Burke, noted the importance of the Ordinance as a gun violence prevention strategy, a community resource, and a law enforcement tool. At the time, Ald. Burke posited the registry’s purpose first as a crime deterrent, suggesting that gun offender registries have a “deterrent effect on people who might be tempted to commit gun crimes again.”⁴ In addition, Ald. Burke suggested that the registry could be a resource for community awareness, as “an enhanced and comprehensive database of registered gun offenders will provide Chicago residents with the opportunity to alert themselves as to the presence of gun offenders in their own communities.”⁵ Finally, Ald. Burke asserted the registry’s function as a law enforcement tool, describing how “[o]fficers responding to calls for help also can check the registry to see if someone known to be at the scene is on the list.”⁶

While the 2013 amendment expanded the list of qualifying convictions for registration, City Council members have long questioned the completeness of the registry. In 2017, when City Council was considering another amendment to the Ordinance, the *Chicago Sun-Times* reported that “registrations ha[d] been flat since the amended [2013] ordinance passed” and that the “annual

¹ McDonald v. City of Chicago, 561 U.S. 742 (2010).

² City of Chicago, “Journal of the Proceedings of the City Council,” July 2, 2010, accessed March 14, 2024, https://chicityclerk.s3.us-west-2.amazonaws.com/s3fs-public/document_uploads/journals-proceedings/2010/070210SP.pdf.

³ City of Chicago, “Journal of the Proceedings of the City Council,” July 2, 2010.

⁴ Burke cited Baltimore, New York, and Washington D.C. as cities with gun offender registries which had a deterrent effect on gun crime. OIG was unable to find publicly available figures on the effect of the registries on gun-related crime rates in New York and Washington D.C. and found that recent studies have questioned the utility and identified negative impacts of Baltimore’s gun offender registry.

Fran Spielman, “City’s ‘gun offender registry’ may be expanded,” *Chicago Sun-Times*, March 8, 2013.

Cheng Keat Tang and Thao Le, “Crime risk and housing values: Evidence from the gun offender registry,” *Journal of Urban Economics*, March 2023, accessed March 13, 2024, <https://www.sciencedirect.com/science/article/abs/pii/S0094119022001024>.

⁵ Hal Dardick, “Wider gun-crime registry advances,” *The Chicago Tribune*, March 8, 2023, accessed March 13, 2024.

⁶ Hal Dardick, “Wider gun-crime registry advances.”

growth of the registry has remained about the same since 2010.”⁷ According to DNA Info, in 2017 the Gun Offender Registry contained 1,942 registered gun offenders.⁸ During the 2017 Ordinance amendment discussions, Ald. Burke stated that “It defies logic to think that there are less than 2,000 convicted gun offenders in the City of Chicago...there is a glitch in the system somewhere.”⁹ From 2017 to 2021, the number of registered gun offenders on the registry grew from 1,400 individuals to about 4,500.¹⁰

A | Components of the Gun Offender Registration Ordinance

The Gun Offender Registration Ordinance requires Chicago residents convicted of gun-related offenses under specific Illinois statutes, such as Unlawful Use of a Weapon (UUW) or Defacing Identification Marks of Firearms, or “substantially equivalent” convictions for federal, state or local laws, to register with the Chicago Police Department (CPD or the Department) within 5 days of their release or discharge from federal, state, or local custodial institutions.¹¹ If the offender’s sentence does not include imprisonment, they are notified of their duty to register at the time of sentencing and must register within 5 days.¹²

1. Notice of Registration Requirement

Section 8-26-055 of the Ordinance states that every qualifying gun offender must be given written notice of their duty to register and that CPD “may cooperate with other agencies, including other public, private, criminal justice, or law enforcement agencies, to issue such notice.”¹³

For convicted gun offenders whose sentence includes imprisonment, CPD relies on custodial institutions such as the Illinois Department of Corrections (IDOC) to notify individuals of their duty to register upon their release from custody.¹⁴ IDOC personnel reported to OIG that the Field Services unit within each custodial institution notifies qualifying releasees of their duty to register, using a notification form provided by CPD.¹⁵ Figure 1 below outlines the notification process for gun offenders released to Chicago from an IDOC facility.

⁷ Frank Main and Art Golab, “Chicago’s gun offender registry ‘glitch’ kept hundreds of names off,” *Chicago Sun-Times*, March 24, 2017, accessed March 14, 2024, <https://chicago.suntimes.com/2017/3/24/18464532/chicago-s-gun-offender-registry-glitch-kept-hundreds-of-names-off>.

⁸ Heather Cherone, “1,942 Gun Offenders Listed On Registry, Prompting Criticism From Council,” *DNAInfo* March 21, 2017, accessed March 14, 2024, <https://www.dnainfo.com/chicago/20170321/mt-greenwood/1942-gun-offenders-listed-on-registry-prompting-criticism-from-council/>.

⁹ Heather Cherone, “1,942 Gun Offenders Listed On Registry, Prompting Criticism From Council.”

¹⁰ As of January 16, 2025, the public Gun Offender Registry includes 6,220 individuals.

¹¹ See Finding 1.B. for more on equivalent convictions, and Appendix A for a complete list of qualifying offenses.

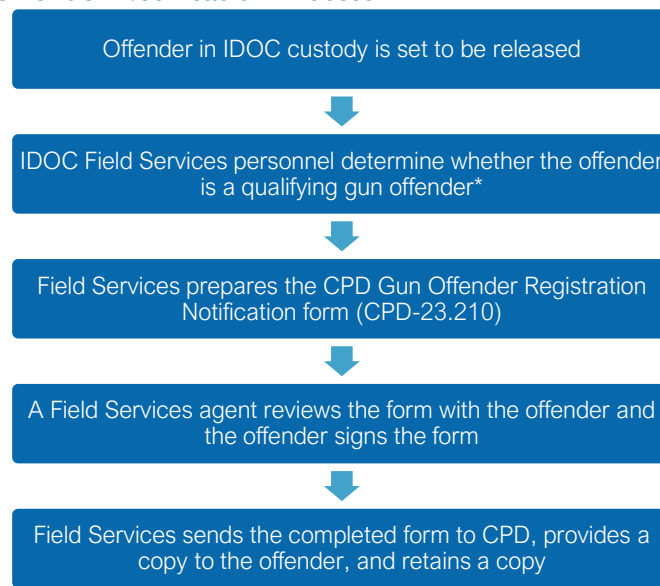
¹² City of Chicago, Municipal Code, Chapter 8-26: Gun Offender Registration Ordinance, https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2644670.

¹³ MCC §8-26-055.

¹⁴ CPD reported that while the majority of notifications are made by IDOC facilities, it also relies on the Cook County Sheriff’s Office to notify releasees from Cook County Department of Corrections (CCDOC) facilities of their gun offender registration obligation.

¹⁵ Chicago Police Department, “CPD-23.210 Gun Offender Registration Notification,” April 2013, accessed March 13, 2024, <https://directives.chicagopolice.org/forms/CPD-23.210.pdf>.

Figure 1: IDOC Gun Offender Notification Process



*See Finding 1 for more detail on IDOC's determination of qualifying offenders.

Source: OIG visualization

2. Registration

Within five days of being notified, individuals with a qualifying gun conviction are required under the Ordinance to report in person to CPD to register as a gun offender. The Ordinance charges CPD with the responsibilities of maintaining the registry of gun offenders and posting it publicly. Within CPD, the Criminal Registration Unit (CRU) processes the registration of qualifying gun offenders. Gun offender registrants must re-register annually for a total period of four years, disclosing any changes in their information during this time, such as a change of address. After four years, absent any further convictions for qualifying offenses, registered gun offenders are released from the obligation to re-register and are removed from the Gun Offender Registry.¹⁶

The Office of Public Safety Administration (OPSA) is a City agency which provides administrative and technical support to the City's public safety agencies, including CPD. OPSA receives gun offender registration information collected by the CRU and updates the public Gun Offender Registry, displayed alongside registered sex offender information within the City's Registered Sex and Gun Offenders Application, accessible through CPD's website.¹⁷ For the purposes of this report, the "Registered Sex and Gun Offenders Application" and the "Gun Offender Registry" are used synonymously. The application is an interactive map which displays registrants' city block of residence, in addition to identifying information including their name, age, race, sex, and basic visual descriptive information (height, weight, hair color and style, complexion, and eye color).

¹⁶ See Finding 3 for more information.

¹⁷ Office of Public Safety Administration, "Registered Sex and Gun Offenders," accessed August 21, 2024, <https://experience.arcgis.com/experience/cbfbf35f4e784aa58d5be6a175e63c96/page/Offender-Dashboard/>. Chicago Police Department, "Gun Offender Database Search," accessed December 10, 2024, <https://www.chicagopolice.org/gun-offender-database-search/>.

Figure 2: Example of gun offender information available on the registry¹⁸

Gun Offender - [REDACTED] ^ x

Zoom to Pan

Statute **720 ILCS 5.0/24-1.6-A-1**
AGG UUW/LOADED-NO FCCA-FOID

Address [REDACTED]
Sex **MALE** | Age **32** | Race **BLACK**
Height **505** | Weight **220**
Hair Color **BLACK** | Style **SHORT - CURLY**
Complexion **DARK BROWN**
Eye Color **BLUE**
Beat **1821** | Ward **27** | Community **NEAR NORTH SIDE**

Source: OPSA Registered Sex and Gun Offenders Application

3. Enforcement and Penalties

The Ordinance states that convictions for failure to register as a gun offender will result in penalties of incarceration, fines, or both. Specifically, that “any person who violates any provision of this chapter, or rule or regulation promulgated hereunder, shall, upon conviction, be fined not less than \$300.00 nor more than \$500.00 or be incarcerated for a term not to exceed six months, or both.”¹⁹ The Ordinance further states that each day the violation exists shall constitute a separate and distinct offense.

CPD directive, “Special Order S02-05-01: Gun Offender Registration,” provides guidance to CPD members for processing individuals taken into custody who have a qualifying gun conviction under the Ordinance.²⁰ This Special Order states that CPD members who encounter convicted gun offenders must determine whether they are in compliance with the Ordinance, and describes the procedure for individuals found to be (1) notified and in violation of the Ordinance or (2) not notified and not registered. When encountering a registered gun offender, CPD members must confirm the registrant has re-registered annually and provided up-to-date residency and employment information. If CPD members find that an individual is in violation of the Ordinance, for example, by failing to report a change in address, employment or school, or failing to report to CRU for initial or annual registration, the Special Order states that the individual will be taken into custody for violating Ordinance provisions Duty to Register (MCC 8-26-020), Duty to Report Change of Information (MCC 8-26-050), or Annual Registration (MCC 8-26-030). CPD members are required to document the violation in a case report, inventory all physical evidence, and complete an Investigatory Stop Report (ISR). When encountering a qualifying gun offender who was never issued a formal notification of their duty to register, the Special Order states that CPD members will detain the individual in order to serve the notification, orally inform them of their duty to register, and have the offender sign CPD form “Gun Offender Registration – CPD Notification” (CPD-23.214).²¹ The individual must then report to CRU within 5 days to complete their registration in person.

¹⁸ Personally identifiable information (name and city block of residence) has been redacted by OIG in this example.

¹⁹ MCC §8-26-100.

²⁰ Chicago Police Department, “Special Order S02-05-01: Gun Offender Registration,” May 25, 2018, accessed March 13, 2024, <https://directives.chicagopolice.org/#directive/public/6517>.

²¹ See Finding 1.A. and Recommendation 5 regarding potential issues regarding the constitutionality of this practice.

Further, CPD directive “Special Order S02-05: Criminal Registration and Community Notification” states that District Commanders, upon receipt of a quarterly listing of criminal registrants residing in their District’s geographic boundaries from CRU, are responsible for organizing quarterly visitations using beat or tactical personnel in order to verify each subject’s criminal registration information and compliance.²² From December 2017 to May 2023, CPD policy tasked CRU with coordinating quarterly visitations in the Districts, but this responsibility was removed in a May 2023 revision to CPD policies.²³ As reported by CPD, it does not conduct quarterly visitations (see Finding 3).

Separately, the “Bureau of Patrol Special Order 17-03: Gun Offender Registration Mission” establishes procedures for Districts to conduct semi-annual gun offender registration missions, in which tactical officers make personal visits to subjects who are known to be in violation of the Ordinance, such as those who have failed to report for initial or annual registration.

B | Gun Offender Registrants

In response to OIG’s inquiry, CPD provided data on all registered gun offenders as of March 21, 2022, which included 4,587 unique individuals on the Gun Offender Registry. The population skewed heavily towards young, Black, male registrants.

Of the 4,587 registrants on the registry:

- a. 98.2% were male,
- b. 84.5% were Black, 12.9% were Hispanic, 2.3% were White, and 0.3% had a race/ethnicity coding of “unknown,”
- c. 81.0% were between the ages of 19 and 39, and
- d. 66.5% were Black males between the ages of 19 and 39.

Figure 3: Demographics of Registered Gun Offenders as of March 21, 2022²⁴

Demographic Characteristic	Count	Percent
Black	3,875	84.5%
Black Female	67	1.5%
19 to 29 years old	30	0.7%
30 to 39 years old	25	0.5%
40 to 49 years old	5	0.1%
50 to 59 years old	7	0.2%
Black Male	3,806	83.0%
19 to 29 years old	1,596	34.8%
30 to 39 years old	1,456	31.8%
40 to 49 years old	532	11.6%

²² Many of CPD’s operations, particularly patrol functions, are carried out within its 22 distinct police Districts. CPD Districts have specific and contiguous geographic boundaries and are led by a District Commander. Chicago Police Department, “Special Order S02-05: Criminal Registration and Community Notification,” May 25, 2018, accessed March 13, 2024, <https://directives.chicagopolice.org/#directive/public/6258>.

²³ Chicago Police Department “General Order G01-02-04: Organization and Functions of the Bureau of Detectives.” Chicago Police Department, “General Order G01-02-05: Organization and Functions of the Bureau of Detectives.”

²⁴ Figure 3 presents registrants recorded as “Black Hispanic” and “White Hispanic” under a single category of “Hispanic.” Further, registrants with a recorded race/ethnicity of American Indian/Alaska Native (N=1), Asian/Pacific Islander (N=1), and Unknown/Refused (N=12) are not displayed in Figure 3. Lastly, the row totals for race/ethnicity includes registrants with unknown age or sex (N=3)—a Black male with unknown age, a Black 30-to-39-year-old with unknown sex, and a Hispanic male with unknown age.

50 to 59 years old	162	3.5%
60 or older	60	1.3%
Hispanic	590	12.9%
Hispanic Female	11	0.2%
19 to 29 years old	5	0.1%
30 to 39 years old	5	0.1%
40 to 49 years old	1	0.0%
Hispanic Male	580	12.6%
19 to 29 years old	304	6.6%
30 to 39 years old	196	4.3%
40 to 49 years old	64	1.4%
50 to 59 years old	11	0.2%
60 or older	4	0.1%
White	107	2.3%
White Female	5	0.1%
19 to 29 years old	2	0.0%
30 to 39 years old	2	0.0%
40 to 49 years old	1	0.0%
White Male	102	2.2%
19 to 29 years old	30	0.7%
30 to 39 years old	49	1.1%
40 to 49 years old	14	0.3%
50 to 59 years old	8	0.2%
60 or older	1	0.0%

Source: OIG Analysis

Within CPD's Gun Offender Registry, OIG found that most registered individuals were convicted of crimes involving the possession of a firearm. Registrants most often had qualifying charges listed as UUW (Unlawful Use of a Weapon) by a felon or person in prison (N=1,991, 43.41%) and aggravated UUW (N=1,496, 32.61%).²⁵ According to Loyola University Chicago's Center for Criminal Justice Research, Policy, and Practice, "[d]espite the legal terminology used in Illinois to define these crimes— specifically, 'unlawful use of a weapon' or 'aggravated unlawful use of a weapon'— these offenses do not involve violence against victims." Instead, these charges indicate "the illegal possession of a gun (i.e., the possession of a gun by persons prohibited from possessing guns due to their age, criminal record, or not having applied for/received a Firearm Owner's Identification/FOID card or a Concealed Carry License/CCL, or possessing a gun in prohibited places)."²⁶

²⁵ As of January 1, 2025, these statutes have been changed to reflect "unlawful possession" of weapons. 720 ILCS 5/24.1.1 and 720 ILCS 5/24-1.6.

²⁶ David E. Olson et al., "Arrests in Cook County for Illegal Possession of a Firearm," Loyola University Chicago Center for Criminal Justice Research, Policy, and Practice, December 2020, accessed March 13, 2024, <https://loyolaccj.org/CookCountygunpossessionbulletindecember2020.pdf>.

Figure 4: Frequency of Qualifying Convictions Represented in CPD's Gun Offender Registrant Data as of March 21, 2022²⁷

Criminal Offense Categorization	Count of Registered Offenders	Percentage of Registered Offenders
UUW by felon or person in prison	1,991	43.41%
Aggravated UUW	1,496	32.61%
Armed habitual criminal	307	6.69%
Robbery and vehicular hijacking offenses	163	3.55%
Aggravated discharge of a firearm	155	3.38%
Assault, battery, home invasions offenses	106	2.31%
Defacing identification marks of firearms	57	1.24%
UUW	51	1.11%
Reckless discharge of a firearm	50	1.09%
Unlawful possession of a firearm by a street gang member	36	0.78%
Armed violence	18	0.39%
Possession of a stolen firearm	13	0.28%
Unlawful possession of firearms and firearm ammunition	11	0.24%
Gunrunning	10	0.22%
Kidnapping and related offenses	3	0.07%
Aggravated possession of a stolen firearm	1	0.02%
Unlawful purchase of a firearm	1	0.02%
<i>Other or Unknown²⁸</i>	118	2.57%
TOTAL	4,587	100.00%

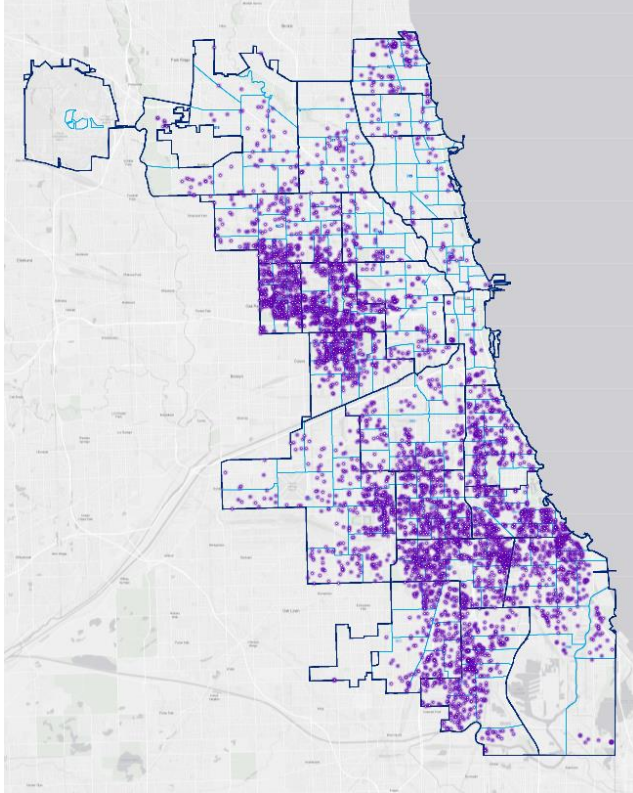
Source: OIG analysis

OIG found that there are gun offender registrants represented on the registry from each of the City's 22 Police Districts and each of the City's 50 Wards. Registrants are most heavily concentrated in the South and West sides of Chicago, specifically in District 006 – Gresham (465 registrants), District 011 – Harrison (431), and District 007 – Englewood (417). This distribution of registered gun offenders throughout Chicago has persisted since the period of OIG's analysis, as shown in the Registered Sex and Gun Offenders Application in Figure 5 below:

²⁷ The underlying Gun Offender Registry data contains information on the statute violated by each registrant. The database used to compile the Gun Offender Registry only allows CRU members to enter one statute, even if an individual has been convicted of multiple qualifying offenses. CRU personnel reported to OIG that in these circumstances, CRU members simply pick one of the offender's qualifying statute violations when they enter the data. Therefore, this analysis is subject to CPD's initial selection of qualifying offenses and may not fully encompass all criminal offenses committed by registrants.

²⁸ "Other or Unknown" includes criminal offenses that have been repealed, renumbered, or fall outside of the explicitly stated statutes listed within the Municipal Code. Statute information was missing for two registrants.

Figure 5: Gun Offender Registrants Shown by City-Block of Residence as of March 21, 2024



Source: Screen capture of the Gun Offender Registry as of March 21, 2024.

III | Objectives, Scope, and Methodology

A | Objectives

The objectives of this evaluation were to describe the demographic profile and qualifying criminal offenses of the registrants on the Gun Offender Registry and to assess how effectively CPD and/or other City agencies are fulfilling the mandates outlined in the Ordinance and provisions outlined in CPD policies, including providing notice to offenders and enforcing registration obligations.

B | Scope

The scope of this inquiry encompasses a snapshot of the Gun Offender Registry, provided by CPD on March 21, 2022, as well as CPD's enforcement policies, training, and practices related to the Gun Offender Registration Ordinance.

Due to limitations of Cook County conviction data (see Finding 1), OIG was unable to identify a population of gun offenders qualifying for registration by which to assess the completeness of the Gun Offender Registry and CPD's enforcement efforts for gun offender registration.

C | Methodology

To describe the individuals on the Gun Offender Registry and the criminal offense(s) for which they were required to register, OIG:

- Calculated descriptive measures about the population of registrants, including:
 - Demographic makeup (race, sex, and age);
 - Geographic distribution (community area and police district); and
 - Criminal offense(s) from among the list of Ordinance-prescribed qualifying crimes.

To determine whether CPD and other City agencies are providing notice to offenders and enforcing the obligation of offenders to register on the Gun Offender Registry, OIG:

- Reviewed CPD and DOL policies on enforcement;
- Interviewed a Sergeant and Detective from CPD's Criminal Registration Unit on the notification and registration processes;
- Interviewed the Commander of the Bureau of Patrol regarding CPD's gun offender visitations and gun missions;
- Interviewed DOL attorneys in charge of prosecuting Municipal Code violations;
- Interviewed 11 Illinois Department of Corrections personnel on notification processes for offenders; and
- Reviewed the MCC Charge Dispositions of Gun Offender Registry violations in 2020 and 2021.

To determine whether CPD and other City agencies are fulfilling other provisions of the Ordinance and CPD's Special Order S02-05, OIG:

- Reviewed CPD policies and processes for sending out Community Notification Lists;
- Interviewed representatives from Chicago Housing Authority, Chicago Board of Education, Chicago Park District, and Chicago Public Library to determine if they had received Community Notification Lists; and

- Interviewed CRU and OPSA personnel responsible for data entry and publication of the public Gun Offender Registry.

In addition to the above, to inform the discussion section of the report, OIG:

- Interviewed District Council Members to understand the community's engagement with the public Gun Offender Registry;²⁹
- Reviewed CPD directives to determine how the Department instructs members to utilize the Gun Offender Registry; and
- Analyzed a sample of registered gun offenders to determine if active registrants continued to be arrested by CPD.

D | Standards

OIG conducted this review in accordance with the Quality Standards for Inspections, Evaluations, and Reviews by Offices of Inspector General found in the Association of Inspectors General's *Principles and Standards for Offices of Inspector General* (i.e., "The Green Book").

E | Authority and Role

The authority to perform this inquiry is established in the City of Chicago Municipal Code §§ 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations, and, specifically, to review the operations of CPD and Chicago's police accountability agencies. The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity. Further, Paragraph 561 of the consent decree entered in *Illinois v. Chicago* required OIG's Public Safety section to "review CPD actions for potential bias, including racial bias."³⁰

²⁹ In July 2021, the Chicago City Council passed an ordinance creating 22 District Councils, each one representing a different police District and working to improve policing and public safety in the District. Each District Council is made up of three people elected by residents of the police District in regular municipal elections every four years. The first District Council elections occurred in February 2023.

Community Commission for Public Safety and Accountability, "Information on District Councils," accessed December 11, 2024, https://www.chicago.gov/city/en/depts/ccpsa/supp_info/district-councils.html.

³⁰ Consent Decree ¶ 561, *State of Illinois v. City of Chicago*, No. 17-cv-6260 (N.D. Ill. Jan. 31, 2019).

IV | Findings

Finding #1: CPD is unable to ensure that all qualifying gun offenders are notified of their duty to register due to a lack of procedural controls with cooperating custodial institutions and the broad scope of offender eligibility under the Gun Offender Registration Ordinance.

CPD appropriately relies on cooperating custodial institutions to notify qualifying gun offenders of their duty to register upon release from custody. However, CPD's current practices impede effective communication, which hampers its ability to fulfill its mandate under the Gun Offender Registration Ordinance. Furthermore, the breadth of criteria requiring registration complicates CPD's responsibilities, making it challenging to identify and notify all qualifying individuals. In fact, CPD has no way of ascertaining the full universe of individuals with gun offenses who are required to register under the Ordinance. Consequently, even if CPD rectifies communication issues within the notification process, it will be unable to ensure that all qualified gun offenders are notified of their duty to register.

A | CPD does not have procedural controls established with the entities upon which it relies to fulfill notification requirements

Section 8-26-055 of the Ordinance states that, "Every gun offender subject to this chapter shall be given individual notice, in writing, of the gun offenders' duty to register. The superintendent may cooperate with other agencies, including other public, private, criminal justice, or law enforcement agencies, to issue such notice."³¹ To meet these notification requirements, the Department coordinates with and relies on Illinois Department of Corrections (IDOC) and Cook County Department of Corrections (CCDOC) personnel to inform qualifying individuals of their duty to register as gun offenders with CPD. CPD provided OIG with a list of 13 IDOC facilities and reported that these facilities report the majority of notifications to the Department on a daily basis.³²

IDOC Field Service agents confirmed to OIG that individuals are notified of their obligation to register, using CPD form "Gun Offender Registration Notification (CPD-23.210)," at the time of their

³¹ MCC §8-26-055.

³² Although CPD stated it also receives notification forms from CCDOC, OIG limited its outreach to the 13 IDOC facilities CPD identified as providing the majority of notifications to CRU.

release from custody.³³ IDOC then sends the notification forms to CPD's Criminal Registration Unit (CRU), where CRU members verify offender information to confirm they meet the registration requirements under the Ordinance. CRU members create an initial file for each notified offender to help facilitate registration when the offenders ultimately report to CRU. This initial file also allows CRU to identify and track individuals as "Notified, Not Registered," who have been notified but failed to register in person within 5 days of receiving their notice.

As a foundational step to building an accurate and complete Gun Offender Registry, custodial institution personnel must correctly identify and provide notice to qualifying offenders. However, OIG identified a lack of clarity among IDOC personnel about which released individuals with gun convictions are required to register and therefore subject to notification. For example, several IDOC Field Service agents told OIG that they were unsure about which specific gun offenses required notification. While some agents mistakenly reported that "all gun offenses" apply, others reported that they refer to the MCC for guidance. Two IDOC Field Service agents reported checking CPD's publicly accessible "Gun Offender Rules and Regulations," dated April 2013.³⁴ Another two referred to a printout list of relevant offenses, although neither could pinpoint the origin of this document. Upon review, OIG found that CPD's "Gun Offender Rules and Regulations" includes four MCC statutes that have been repealed.³⁵ It also omits MCC 8-20-075, prohibiting unlawful possession of an assault weapon, which is a qualifying gun offense and thus requires notification.³⁶

Additionally, the Gun Offender Registration Ordinance applies only to offenders who reside within Chicago. IDOC personnel reported that they complete notification forms for any qualifying individuals who provide a Chicago address at the time of their release. However, IDOC personnel only verify the residential addresses of individuals who are being paroled, and do not verify addresses for individuals who are being discharged. IDOC Field Service agents explained that discharged individuals are not subject to residence pre-approval and can reside anywhere. If an individual does not provide a Chicago address or does not disclose their future residence to IDOC, the IDOC Field Service agents do not complete the notification form.

While CPD relies on IDOC to initiate the gun offender registration process, communication between CPD and IDOC concerning the Gun Offender Registration Ordinance and its related policies is minimal and may lead to gaps in the notification process. In OIG's initial interviews with IDOC, several IDOC Field Service agents indicated they sent their notification paperwork directly to a specific CRU member. This CPD member left CRU in December 2022 but reported to OIG in February 2023 that they continued to receive notification emails from IDOC at their individual CPD email address. The CPD member stated that they would forward the emails with notification paperwork to CRU members.

During the course of OIG's inquiry, IDOC leadership reported to OIG that CPD did not alert them of a general CRU email address that was in use to receive notification paperwork, and instead an IDOC employee discovered this information in the course of their work with CRU. Upon learning of

³³ Chicago Police Department, "CPD-23.210 Gun Offender Registration Notification," April 2013, accessed March 13, 2024, <https://directives.chicagopolice.org/forms/CPD-23.210.pdf>.

³⁴ Chicago Police Department, "Rules and Regulations Gun Offender Registration- Chapter 8-26," April 20, 2013, accessed March 13, 2024, <https://home.chicagopolice.org/services/gun-offender-database-search/>.

³⁵ MCC 8-26-020 states that the duty to register does not apply to individuals whose convictions are "based on a law that was invalidated or held to be unconstitutional or otherwise invalid." In this inquiry OIG did not seek to determine whether the registry contains individuals with invalid convictions.

³⁶ See Appendix A.

the CPD CRU email address, IDOC shared it with its Field Service agents. Inconsistent information and a lack of consistent, structured communication between CPD and custodial institutions increases the risk that notification forms could be sent to an incorrect or outdated recipient, which could inhibit CPD from efficiently completing offender registration or identifying notified offenders who have failed to register. Numerous IDOC employees reported to OIG that they did not receive confirmation of receipt for their emailed or mailed CPD-23.210 notification forms. CPD confirmed to OIG that it does not review the notification practices of cooperating institutions.

Critically, inconsistency and ambiguity in the notification process could have consequences for qualifying gun offenders who are not provided notice of their duty to register at the time of their release. According to the Ordinance, an individual's obligation to register as a gun offender arises only after they receive written notification of their duty to register.³⁷ However, OIG found that CPD "Special Order S02-05-01: Gun Offender Registration," instructs CPD members encountering qualifying gun offenders who have not been issued formal notification of their duty to register to detain the individual to serve the notification, to orally inform them of their duty to register, and to have the offender sign CPD form "Gun Offender Registration – CPD Notification" (CPD-23.214).³⁸ This policy directing CPD members to detain any "Not Notified/To Be Notified" individuals raises constitutional concerns under the Fourth Amendment and its protections against unreasonable searches and seizures. CPD members cannot logically form at least a reasonable suspicion that a crime was committed and therefore may be unable to lawfully detain an individual who is "Not Notified/To Be Notified" of their duty to register; an individual who failed to register because they did not receive notice is not committing a crime.

Additionally, the Gun Offender Registration Ordinance states that offenders are required to renew their registration for four years following their *initial registration*. Therefore, if CPD or a cooperating custodial institution fails to notify an individual of their duty to register at the time of their release, the individual's registration period as a gun offender may begin long after their release. A delay in notification would thus prolong the offender's obligation to register through no fault of their own.

B | CPD cannot practicably determine the complete universe of gun offenders qualifying for registration

Separate from the administrative concerns regarding offender notification outlined above, it is also not feasible for CPD to identify all qualifying offenders due to the scope of conditions outlined in the Gun Offender Registration Ordinance. For instance, the Ordinance requires registration for individuals convicted of qualifying gun offenses who, at any point, move to Chicago. Specifically, MCC 8-26-020 states, "A gun offender who did not reside in the city at the time when registration would otherwise be required pursuant to this chapter, and subsequent to that time becomes a resident of the city, shall register within 5 days of becoming a resident of the city."³⁹ However, CPD leadership reported to OIG that the Department would have "no way" to know if an offender convicted in another state moved into Chicago. Because CPD does not have a standard process to identify offenders that move into the city limits, these individuals would go unnotified of their obligation to register, unless informed through other circumstances.⁴⁰

³⁷ MCC §8-26-020(a)(4).

³⁸ Chicago Police Department, "Special Order S02-05-01: Gun Offender Registration."

³⁹ MCC §8-26-020.

⁴⁰ For example, it is possible that qualifying gun offenders who are on parole at the time of their move to Chicago might be informed of their obligation to register as a result of the transfer of their parole.

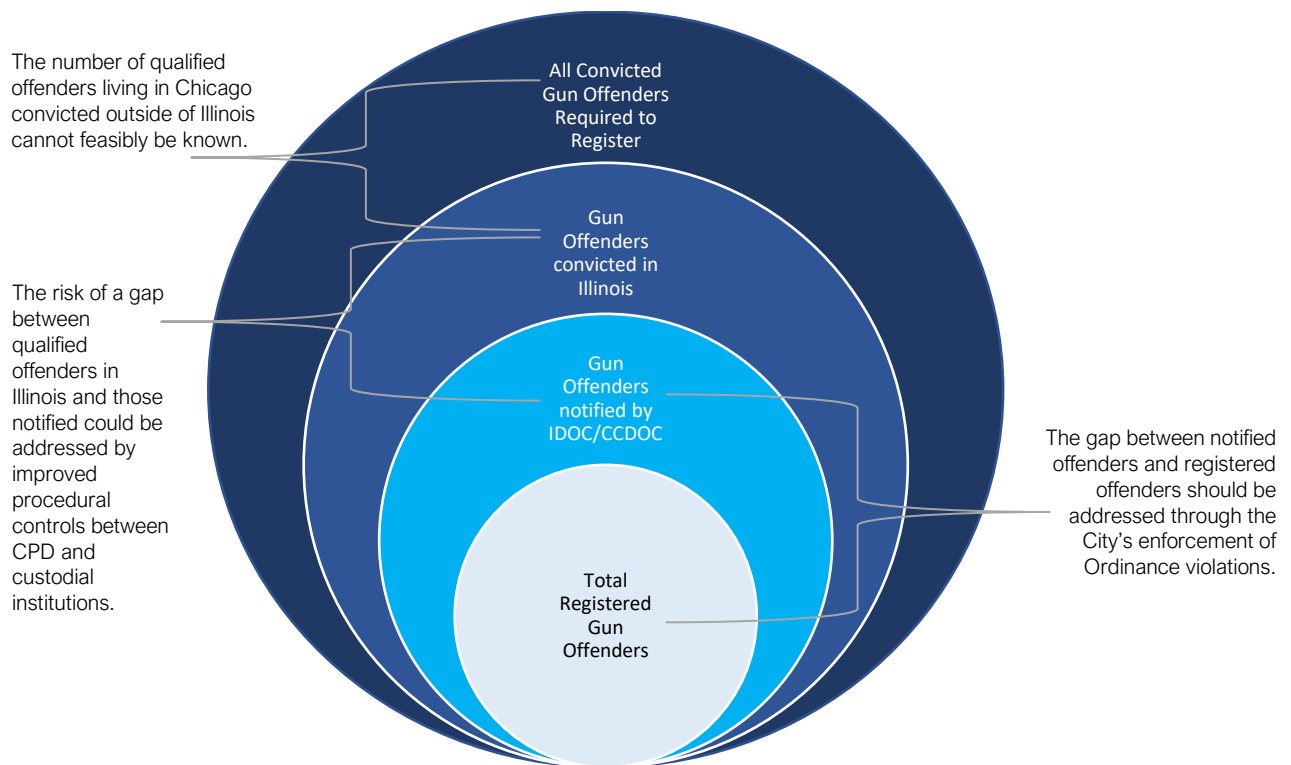
Creating an even wider net of qualifying gun offenders is the Ordinance's inclusion of violations of "any federal, state, or local law that is substantially equivalent to any [gun] offense listed."⁴¹ In interviews with OIG, CPD members acknowledged gaps in their processes that may lead to offenders being left off the registry. For example, due to overlapping legal jurisdictions or the "substantially equivalent" Ordinance clause, some gun offenders required to register would be held within the Federal Bureau of Prisons, which do not have CPD notification processes in place. A detective within CRU reported to OIG that the Federal Bureau of Prisons does not send notification forms to CRU, but that some qualifying gun offenders do report to CRU at the guidance of their federal probation officer. The challenge in identifying gun offenders convicted of equivalent federal, state, or local laws is evident in the fact that the gun offender registry almost exclusively contains individuals with reported Illinois convictions. OIG found that of the 6,220 records on the Gun Offender Registry as of January 2025, 99.9% reported a conviction under an Illinois criminal statute.

As part of its analysis, OIG attempted to estimate the number of gun offenders required to register using gun-related conviction data from the Cook County State's Attorney's Office and the Office of the Chief Judge of the Circuit Court of Cook County. However, OIG could not compile a complete list due to data limitations such as records reflecting only a single "primary" criminal charge, and residency information only for the time of sentencing and not release from custody. Based on the narrow criminal charge and residency information provided, it is likely any analysis of the conviction data would have been unreliable. For example, any analysis would have excluded convictions where a qualifying gun charge was not listed as the primary criminal charge and where offenders who did not reside in Chicago at the time of sentencing moved into the city after their release, and would have included offenders who resided in Chicago at the time of sentencing but not after their release. Therefore, it is not feasible for CPD to identify all potential qualifying gun offenders using information obtained at the time of conviction. Instead, CPD and cooperating custodial institutions are able to identify offenders at the point of their release from custody when their intended residence is more likely to be known and a complete list of their qualifying convictions is available.

As shown in Figure 6 below, there is an unknown discrepancy between the total qualifying individuals mandated to register and those who ultimately make it onto the Gun Offender Registry.

⁴¹ MCC §8-26-010.

Figure 6: Universe of Qualifying Gun Offenders vs Registered Gun Offenders



Please note that the above visualization is not to scale and is for illustrative purposes only.

Source: OIG visualization

CPD therefore appropriately coordinates with custodial institutions at the time of offender release, as permitted under the Ordinance. However, due to the importance of notification in the creation and completeness of the Gun Offender Registry, CPD should take action to address any misunderstanding of qualifying requirements among custodial institution personnel, update public reference documents, and improve interagency communication.

Finding #2: Information about CPD's current gun offender registration process and practices is inconsistent, risking confusion for qualifying offenders and hindering the Department's efforts to efficiently register offenders.

The Gun Offender Registration Ordinance requires individuals who reside in the City and are convicted of a qualifying gun offense to register with CPD within 5 days of receiving their notice to register.⁴² This registration must be done in person and individuals must re-register annually for a total period of four years. The registration process requires offenders to report to CPD's Criminal Registration Unit (CRU) and includes requirements to provide personal, contact, and conviction information, as well as to submit to photographs and fingerprinting. While the Ordinance places the obligation to register on gun offenders themselves, OIG found that CPD's guidance is inconsistent on where and when to register. Coupled with limited registration sites and operational hours, these informational and logistical barriers may hinder offenders' compliance with the registration requirements. In accordance with Ordinance mandates and in the interest of creating a thorough and accurate registry, CPD should create more accessible avenues for registration.

A | CPD provides inconsistent information about where and when gun offenders may register

OIG discovered conflicting information across CPD resources about the available locations and hours for gun offender registration. The Gun Offender Registration Notification form (CPD-23.210), a copy of which is given to gun offenders when they are notified of their duty to register, and CPD's "Gun Offender Rules and Regulations," a publicly available document on CPD's Gun Offender Database Search page, direct offenders to CPD Headquarters at 3510 S. Michigan Avenue for registration.⁴³ However, due to a fire in December 2021, CRU relocated temporarily from CPD Headquarters to its Juvenile Intervention and Support Center (JISC) at 3900 S. California Avenue, and then in August 2022 again moved to a City-owned building at 9059 S. Cottage Grove Avenue. These location changes were not communicated to agencies involved in gun offender registration notification and prosecution, as IDOC personnel and City attorneys with the Department of Law reported to OIG that in this timeframe they continued to direct gun offenders to CPD Headquarters

⁴² MCC §8-26-020.

⁴³ By September 2023, CPD had updated the address on its Gun Offender Database Search page itself to 9059 S. Cottage Grove Ave., but the attached Rules and Regulations still list CRU's location as 3510 S. Michigan Avenue. Chicago Police Department, "CPD-23.210 Gun Offender Registration Notification," April 2013, accessed March 13, 2024, <https://directives.chicagopolice.org/forms/CPD-23.210.pdf>. Chicago Police Department, "Rules and Regulations Gun Offender Registration- Chapter 8-26," April 20, 2013, accessed March 13, 2024, <https://home.chicagopolice.org/services/gun-offender-database-search/>.

for their initial registration.⁴⁴ In correspondence with OIG in November 2024, CPD confirmed that gun offender registration is available at two City locations: 9059 S. Cottage Grove Avenue (Chatham location) and 2452 W. Belmont Avenue (North Center location).

Further, information regarding the operating hours for criminal registration is inconsistent across sources. In April 2023, the City launched its “re-entry hub,” a new website for residents returning from incarceration, which provides “information about registration in Chicago, including where to go and how to register.”⁴⁵ OIG found that while CPD’s “Gun Offender Rules and Regulations” and “Special Order S02-05: Criminal Registration and Community Notification” state that registration hours are from 8:00 a.m. to 2:30 p.m., Monday through Friday, the City’s re-entry hub states “registration occurs daily from 7:30 a.m. to 2:00 p.m.”⁴⁶ In correspondence with OIG in November 2024, CPD confirmed that gun offender registration is available Monday through Friday from 7:30 a.m. to 2:00 p.m. at both locations. Notably, the City re-entry hub accurately reports the locations and hours of operations for gun offender registration but does not specify that registration only occurs on weekdays.

B | Large volumes of criminal registrants, limited registration hours and locations, and safety concerns may hinder individuals from complying with gun offender registration requirements

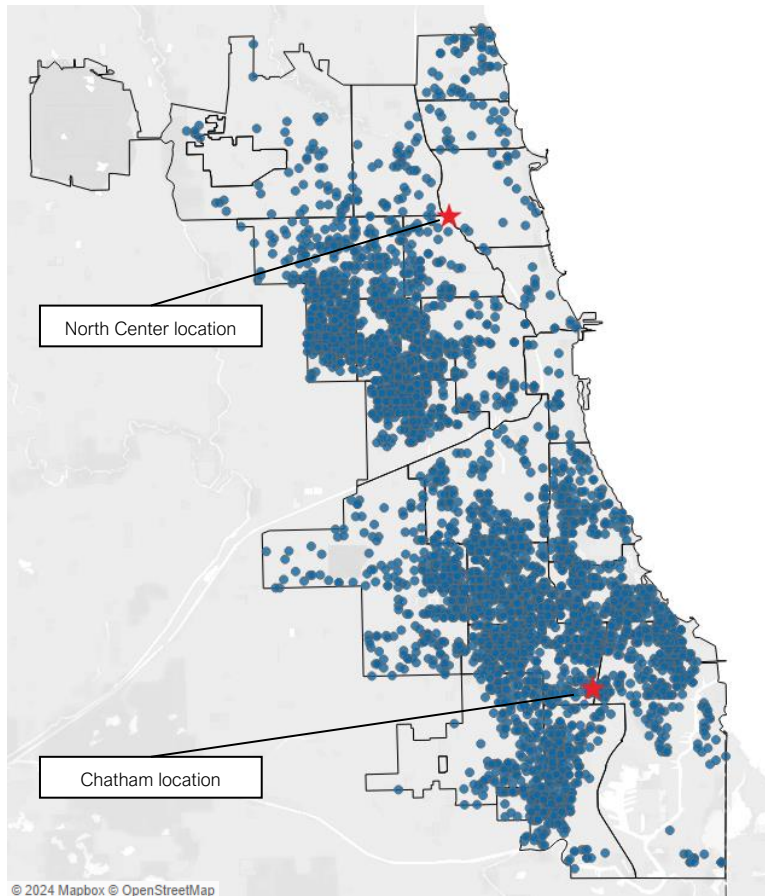
Of the two CRU registration sites available to gun offenders, only one is located in an area with a high concentration of registered gun offenders. The stars shown in Figure 7 below indicate CPD’s current Chatham and North Center registration sites alongside the reported residences for all registered gun offenders as of March 21, 2022.

⁴⁴ City attorneys reported to OIG that they may provide qualifying gun offenders with the address of where to register if the individual is being prosecuted for non-compliance with the Gun Offender Registration Ordinance. See Finding 3 for more information on CPD and the Department of Law’s enforcement strategies.

⁴⁵ City of Chicago, “Re-Entry in Chicago,” accessed March 14, 2024, <https://www.chicago.gov/city/en/sites/reentry/home.html>.

⁴⁶ City of Chicago, “Conviction Registries,” accessed March 13, 2024, <https://www.chicago.gov/city/en/sites/reentry/home/conviction-registries.html>.

Figure 7: Registered Gun Offender Residences and CPD Registration Sites



Source: OIG Visualization of CPD's Gun Offender Registry data

Additionally, CRU personnel at both locations are responsible for registering individuals on multiple criminal registration lists. The North Center facility also registers Murderer and Violent Offender Against Youth offenders while the Chatham location registers Murderer and Violent Offender Against Youth offenders as well as sex offenders.

In January 2023, there were reports of excessive wait times at registration sites, with some offenders being turned away as many as five separate times.⁴⁷ These CRU delays not only require individuals to return multiple times to complete their registration obligations, but also leave them vulnerable to criminal liability for their failure to timely register as gun offenders. Unlike CPD Headquarters, which had indoor accommodations for registrants, the current registration locations have had reports of individuals waiting in long lines outside. The City's re-entry website echoes these conditions and states that "it is not uncommon for there to be a line and significant wait

⁴⁷ Shannon Heffernan, "People with sex and gun convictions are required to register with police," WBEZ Chicago, January 11, 2023, accessed March 13, 2024, <https://www.wbez.org/stories/chicago-police-sex-and-gun-offender-registry/3f11349e-dabf-48f0-8d18-963f87a0ac01>.

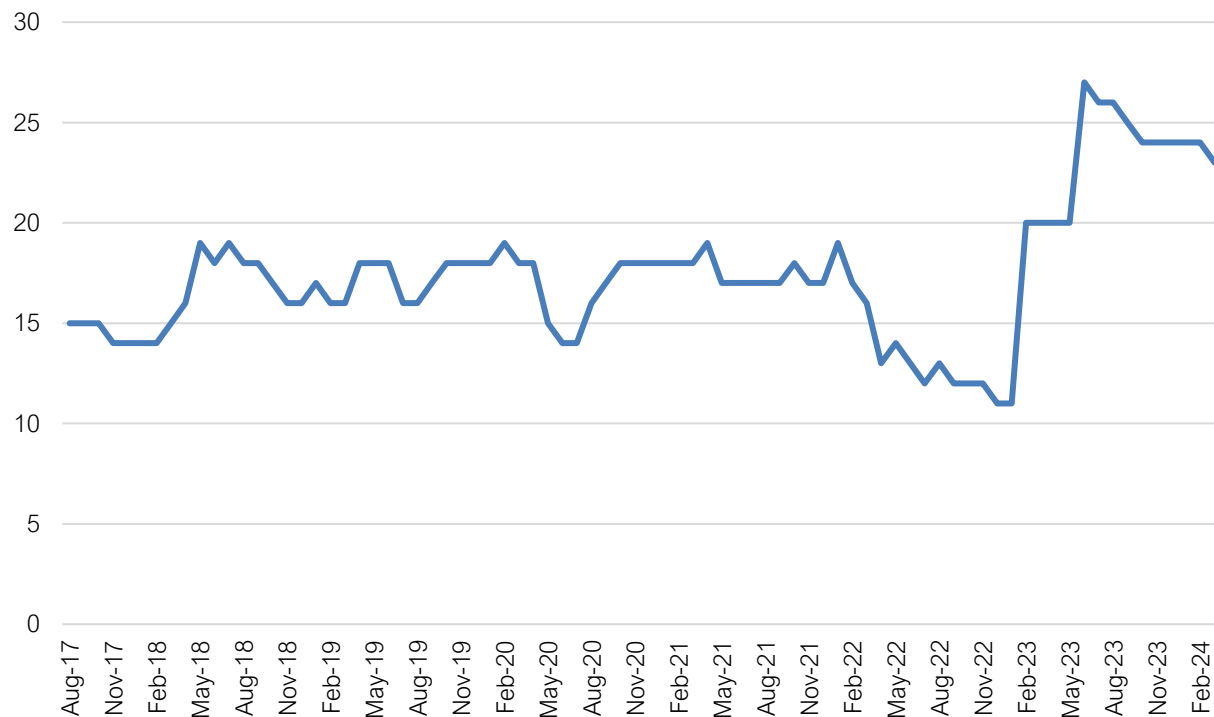
Lourdes Duarte and Andrew Schroedter, "Officer shortage means some sex offenders can't register in Chicago," WGN, January 31, 2023, accessed March 13, 2024, <https://wgntv.com/news/wgn-investigates/officer-shortage-means-some-sex-offenders-cant-register-in-chicago/>.

times.”⁴⁸ CRU members reported to OIG that in response to COVID-19 guidance, an appointment process for offender registration had at one point been implemented, but as of April 2022 had been discontinued.

Aside from inconvenience, these conditions pose real danger, with one CPD member calling it a “drive-by waiting to happen.”⁴⁹ Notably, CRU’s Chatham registration site is located within an area identified by CPD as gang-controlled.⁵⁰ However, offenders from all over Chicago, including those who may be involved in gangs and/or gang conflicts, face waiting outside in lengthy lines at a City facility in order to comply with their duty to register.

In January 2023, WGN Chicago broadcast an interview with a retired former Commander of the CRU who reported that the unit was severely understaffed, with only “half the number of persons they had several years ago.”⁵¹ Figure 8 below displays the fluctuation of CPD members assigned to CRU in recent years.

Figure 8: Number of CPD Members assigned to the Criminal Registration Unit, August 2017 to March 2024



Source: OIG Analysis

⁴⁸ City of Chicago, "Conviction Registries," accessed March 13, 2024, <https://www.chicago.gov/city/en/sites/reentry/home/conviction-registries.html>.

⁴⁹ Shannon Heffernan, "People with sex and gun convictions are required to register with police."

⁵⁰ The Chatham facility is located in CPD Beat 0633.

Office of Public Safety Administration, "2023 Gang Territorial Boundaries," January 9, 2024, accessed March 13, 2024, <https://chicagopd.hub.arcgis.com/documents/ChicagoPD::chicago-gangs2023/explore>.

⁵¹ Lourdes Duarte and Andrew Schroedter, "Officer shortage means some sex offenders can't register in Chicago."

A month after that broadcast, in February 2023, CPD increased the number of members assigned to the CRU. However, limited registration sites and operation hours of the unit may continue to pose a challenge for offenders to comply with registration obligations. The former Commander criticized CPD for not effectively facilitating the registration process, stating, "CPD is not doing their part to let the registrants follow the law."⁵²

CPD's gun offender registration process is a part of the Department's larger criminal registration efforts by the CRU. CPD continues to provide outdated and inaccurate information to gun offenders about where and when to register in the registration notification form provided to those required to register, the "Gun Offender Rules and Regulations" posted on its website, and the Special Order governing gun offender registration. Providing inaccurate registration information may create confusion for those seeking to comply with the Ordinance. These inconsistencies, combined with real safety concerns at the registration sites, continue to compromise efficient and effective registration of gun offenders within the period mandated by the Ordinance.

⁵² Lourdes Duarte and Andrew Schroedter, "Officer shortage means some sex offenders can't register in Chicago."

Finding 3: Despite requirements in CPD directives meant to enforce the Ordinance, CPD does not proactively monitor or pursue registered or unregistered gun offenders, risking an incomplete and inaccurate registry and diminishing its usefulness.

As discussed in Findings 1 and 2, the Gun Offender Registry is incomplete due to the difficulty of identifying all qualifying offenders under the Ordinance and the operational deficiencies within the notification and registration processes. Additionally, OIG identified several issues raising concerns about the registry's accuracy and reliability, including infrequent data verification, outdated registry entries, and DOL's limited prosecution of violations.

A | CPD does not comply with its own policies to monitor or pursue registered or unregistered gun offenders

CPD directives outline two processes to ensure Ordinance compliance through CPD's Bureau of Patrol (BOP): Criminal Registrant Visitations—which would enable CPD to verify the information listed for registered gun offenders—and Gun Offender Registration Missions—which would allow CPD to pursue notified, but unregistered gun offenders. However, as of this writing, CPD reported to OIG that gun offender registrant visitations have never occurred, and Gun Offender Registration Missions have not occurred since December 2021.

Figure 9: Criminal Registrant Visitations and Gun Offender Registration Missions

Department Action		
	Criminal Registrant Visitations	Gun Offender Registration Missions
Purpose	To verify/check information provided by criminal registrants	To register individuals who are out of compliance with the Ordinance
CPD Directive	S02-05: Criminal Registration and Community Notification	BOPSO 17-03: Gun Offender Registration Mission
Subject	ALL registered individuals	Notified/Not Registered or Individuals Overdue for Annual Registration
Frequency per Policy	Once per year ⁵³	Twice per year – June and December
Status	CPD BOP reported they have never done gun offender registrant visitations.	CPD BOP reported Gun Offender Registration Missions were last done in December 2021.

Source: CPD Directives and OIG analysis

According to the Gun Offender Registration Ordinance and CPD's "Gun Offender Rules and Regulations," at the time of initial and annual registration, the gun offender "shall submit to fingerprinting and photographing . . . [and] will be required to produce a copy of a driver's license, a non-driver's government issued photo identification card, or another document . . . that establishes proof of address on the date of registration."⁵⁴ CRU personnel then input the registration data into CPD's Citizen Law Enforcement Analysis Reporting (CLEAR) application. Under the Ordinance, registrants are also required to "report any change in information...within five days of such change."⁵⁵ Per CPD "Special Order S02-05: Criminal Registration and Community Notification," individuals must return to a Criminal Registration Unit location to report any changes in person.⁵⁶

CPD's "General Order G01-02-04: Organization and Functions of the Bureau of Detectives," effective from December 8, 2017, to May 11, 2023, charged CRU with coordinating "quarterly verification checks of registrant addresses." Similarly, "Special Order S02-05: Criminal Registration and Community Notification," states that for each District, "The District Commander, upon receipt of a quarterly criminal offender registrant listing, will:

1. ensure personnel will follow internal Bureau of Patrol protocol for conducting quarterly visitations.
2. ensure all registrants on the list are visited within three (3) weeks of receipt of the quarterly list."⁵⁷

⁵³ CPD "Special Order S02-05: Criminal Registration and Community Notification" states that "Districts will receive a listing each quarter of a different criminal registrant group residing in their respective districts." Therefore, although the Districts receive a listing each quarter, because there are four registries (sex offenders, arsonists, Murderer and Violent Offender Against Youth offenders, and gun offenders), gun offenders registrant information would be verified once per year. Chicago Police Department, "Special Order S02-05: Criminal Registration and Community Notification," May 25, 2018, accessed March 13, 2024, <https://directives.chicagopolice.org/#directive/public/6258>.

⁵⁴ MCC §8-26-020.

Chicago Police Department, "Rules and Regulations Gun Offender Registration- Chapter 8-26," April 20, 2013, accessed March 13, 2024, <https://home.chicagopolice.org/services/gun-offender-database-search/>.

⁵⁵ MCC §8-26-050.

⁵⁶ Chicago Police Department, "Special Order S02-05: Criminal Registration and Community Notification."

⁵⁷ Chicago Police Department, "Special Order S02-05: Criminal Registration and Community Notification."

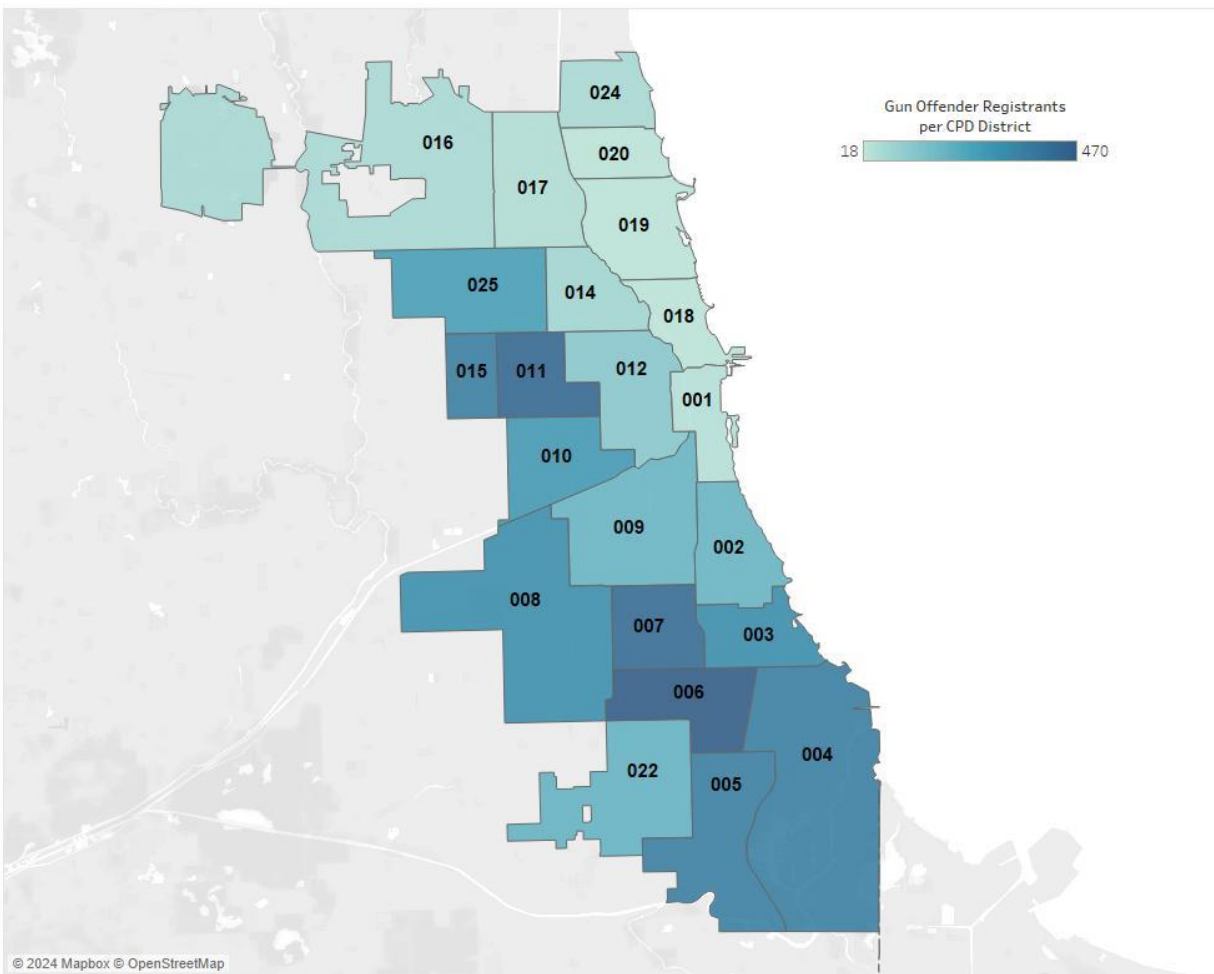
S02-05 further states that these visitations are to “verify the subject's criminal registration information and compliance.”⁵⁸ In an interview with OIG, CRU confirmed that it has never disseminated quarterly registrant lists, which according to CPD policy, should be used to initiate gun offender registrant visitations, but reported that it disseminates a Community Notification List that “appear[s] to have the same information that would likely be contained within a criminal offender registrant list.” According to Special Order S02-05, District Commanders are to receive the Community Notification List which could allow Districts to conduct visitations of gun offender registrants. However, from 2020 to 2024, OIG has only identified one Community Notification List, sent in July 2023, which contained gun offender registrant information.⁵⁹ Further, the Commander of the Bureau of Patrol reported to OIG that gun offender visitations had never been conducted during their time with the Bureau. Thus, CPD relies on information and documents provided by the registrant during the initial registration and the subsequent annual registrations but does not systematically follow up with compliant registrants at any other point in their four-year registration period.

Notably, if the Department were to begin conducting quarterly registrant visitations by the Bureau of Patrol, it is important to consider that because of the uneven distribution of registered gun offenders throughout the city, the responsibility to conduct visitations would vary widely by CPD District. For example, in Districts 006, 007, and 011, each of which is home to over 400 registered gun offenders, visitations would require more significant resources than in other Districts.

⁵⁸ Chicago Police Department, “Special Order S02-05: Criminal Registration and Community Notification.”

⁵⁹ See Discussion, Subsection A for more information.

Figure 10: Distribution of Gun Offender Registrants by CPD District as of March 21, 2022



Source: OIG Visualization of Gun Offender Registry Data

Separately, CPD's "Bureau of Patrol Special Order BOPSO: 17-03 Gun Offender Registration Mission," requires the Criminal Registration Unit to create and distribute a "semi-annual list of gun Registration violation offenders" to BOP during the first week of June and December. This list is comprised of individuals who have been notified to register, but have not reported to CRU, as well as individuals whose yearly registration renewals are overdue. These lists are then to be distributed to individual District Commanders to coordinate tactical officers and complete "Gun Offender Registration Missions." BOPSO: 17-03 requires District Commanders to "ensure that all gun registration violators are visited within one week of the receipt of the list."

In an interview with OIG, the Commander of BOP described the procedures for a Gun Offender Registration Mission. They reported that prior to conducting the Gun Offender Registration Mission, tactical officers run the offender's information through law enforcement databases to check for active warrants, incarcerations, and to verify residency. The tactical officers then visit the address provided by CRU, which constitutes the Gun Offender Registration Mission. If the tactical officers

determine that the offender is non-compliant with the Ordinance, BOPSO 17-03 states the offender will be arrested.⁶⁰

Despite CRU leadership reporting that Gun Offender Registration Missions are the method by which CPD brings such “Notified, Not Registered” offenders into compliance with the Ordinance, CPD confirmed that no Gun Offender Registration Missions have been conducted by the Bureau of Patrol since December 2021. As of November 2024, CPD reported to OIG that there were 500 “Notified, Not Registered” gun offenders. CPD did not provide a reason as to why these coordinated missions are not being conducted.

While the Bureau of Patrol has not organized a Gun Offender Registration Mission since 2021, in March 2023 OIG spoke with a District Commander who reported conducting missions of a similar nature. The District Commander reported that their decision to conduct those missions was based on the District’s crime statistics and included gun offenders of varying compliance, not solely those with a registration violation. The District Commander stated that when there are locations identified in their District with a high number of shootings, teams are sent to do “gun offender registration missions” and make arrests as needed if individuals are carrying weapons. The District Commander stated that tactical officers and members in the District’s Strategic Decision Support Center rooms know the individuals who should be on the Gun Offender Registry and will do street stops to ensure they are registered. Elaborating on these tactics, the District Commander stated, “we can’t put a car on every street, on every corner.”

Although processes to enforce the Ordinance—gun offender registrant visitations and Gun Offender Registration Missions—are built into CPD Directives, OIG found the Department does not presently conduct either practice. The Department’s lack of proactive enforcement of the Gun Offender Registry questions the registry’s importance and usefulness to police. Additionally, by not systematically verifying and updating the information for registered gun offenders or pursuing unregistered offenders, CPD increases the likelihood that the information that is recorded in the Gun Offender Registry is inaccurate and incomplete. Below, OIG discusses additional quality concerns it identified in the records included on the Gun Offender Registry.

⁶⁰ The SAFE-T Act states that “law enforcement shall issue a citation in lieu of custodial arrest... for those accused of any offense that is not a felony or Class A misdemeanor unless (i) a law enforcement officer reasonably believes the accused poses a threat to the community or any person.” Based on CPD’s public arrest records, the Department continues to arrest individuals for violations of the Gun Offender Ordinance. CPD’s “Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures,” effective September 18, 2023, states that certain persons are ineligible for release by citation. Someone who is ineligible for release by citation is an individual who “poses a threat to the safety of an individual or the community,” and in establishing a threat, CPD members may consider felony convictions within the last twenty years, including those related to “gun-related charges” in the arrestee’s criminal history.

Chicago Police Department, “Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures,” September 18, 2023, accessed March 15, 2024, <https://directives.chicagopolice.org/#directive/public/6976>.
Chicago Police Department, “Special Order S02-05-01: Gun Offender Registration.”

B | CPD's and OPSA's records management practices, such as the lack of a regular audit, have resulted in data errors published on the registry and risk that individuals could remain on the registry beyond their required registration period

OIG found that CPD's data management practices create the risk that registrants' information is being shared with the public beyond their four-year registration period. OPSA personnel stated that the mapping process for the public registry does not involve any alterations to the registration data. The registry is automatically refreshed daily from the registration data in CPD's CLEAR system and CRU is responsible for entering and maintaining the gun offender data in CLEAR. Those responsibilities include entering the registrant's personal attributes and applicable criminal statutes, as well as removing information for individuals who have met their four-year registration obligation from the registry. The gun offender data provided by CPD contains an "Expiration Date" field. Per CRU, the "Expiration Date" is the date that is "four years from the first time [the offender] register[s]," and is therefore when the offender's duty to register expires. CRU personnel described a manual data cleaning process for removing registrants' information after their expiration date has passed. CRU members explained that this process occurs by selecting a past date range within the "Expiration Date" data and removing individuals from their database who fall within that expiration date range. Consequently, this manual process compromises CRU's ability to ensure the registry remains accurate as it relies on the assumption that the expiration date is valid and that CRU members consistently purge individuals' information based on the appropriate registration expiration date. In analyzing CPD's Gun Offender Registry data from March 2022, OIG found that 132 records had expiration dates which had lapsed and that 316 records had no expiration date.⁶¹ Based on OIG's analysis, at that time, anywhere from 2.9% to 9.8% of records were improperly included on the Gun Offender Registry. In effect this means that the personal information of offenders who complied with their registration obligations under the Ordinance remained on the public registry beyond the timeframe required by law.

When asked in December 2021 about its maintenance of gun offender data, CRU leadership informed OIG that they last audited registrant data in February 2021. Nevertheless, OIG identified seven registrants on the registry who had expiration dates prior to this audit. Further, OIG identified additional data validation concerns in its analysis, such as registered gun offenders whose ages were listed as 0 and 1 years old, duplicate records of the same registrant, and missing or irrelevant statute data. A lack of data validation increases the risk of invalid and outdated information on the registry and decreases its utility. In November 2024, CRU leadership told OIG that "an audit is conducted monthly wherein Gun Offenders are removed from the registry upon completion of their four-year registration period." On January 16, 2025, OIG downloaded data from the Registered Gun and Sex Offender Application and found 37 records with expiration dates that had lapsed prior to December 2024, 14 records with no expiration date, and 2 records with expiration dates in 2099.

⁶¹ The data analyzed by OIG and referenced here was provided by CPD in March 2022. However, OIG found that these data concerns remain, as OIG has identified that, as of this publication, OPSA's Registered Sex & Gun Offender Application also contains records with missing or lapsed expiration dates. Office of Public Safety Administration, "Registered Sex and Gun Offenders," accessed August 21, 2024, <https://experience.arcgis.com/experience/cbfbf35f4e784aa58d5be6a175e63c96/page/Offender-Dashboard/>.

C | The City's Department of Law typically prioritizes bringing violators into compliance with the Ordinance rather than pursuing penalties for violators

Under Illinois law, Chicago is a Home Rule municipality, which allows the City to exercise any power pertaining to its government or affairs unless there is an express limitation on that power enacted in State law.⁶² Under this rule, DOL is authorized to prosecute Gun Offender Registration Ordinance violations.⁶³ DOL attorneys from the Legal Information and Prosecution Division stated to OIG that their division handles the prosecution of Gun Offender Registration Ordinance violations, sometimes collaborating with the Cook County State's Attorney's Office (CCSAO) if an individual is facing both state and municipal charges.

OIG found, however, that even when CPD arrests individuals for violating the Ordinance, DOL rarely pursues penalties for violators. In response to an information request during its 2022 City Council budget hearing, CPD provided arrest and disposition data for MCC violations from January 1, 2020, through September 30, 2021, including violations of the Gun Offender Ordinance. These violations included:

- Gun Offender Duty to Register and to Verify,
- Initial Gun Offender Registration,
- Annual Gun Offender Registration,
- Gun Offender Registration Period, and
- Gun Offender Duty to Report.

During this 21-month period, CPD reported that it made 589 total arrests related to Gun Offender Registry violations and that 443 arrests had reached a final disposition.⁶⁴ OIG analyzed the 443 final dispositions reported and found that 91.0% (403 arrests) ended in non-suits, where charges were dismissed because prosecution was declined. DOL attorneys explained that their approach prioritizes bringing individuals into compliance with registration rather than pursuing penalties for violating the Ordinance.⁶⁵ When an individual who has violated the Ordinance is scheduled to appear in court, DOL attorneys contact CRU to determine whether the offender has since registered as a gun offender. If a defendant has reached compliance with the Ordinance, DOL attorneys reported that under those circumstances, they would "non-suit" the case, dismissing the charges with the court. Similarly, a CRU Sergeant asserted that the unit does not take law enforcement action against offenders who report to a CPD criminal registration site beyond the 5-day window from their release date, which is a violation of the Ordinance, but instead completes the individuals' registration.

⁶² Ill. Const. art. VII, § 6; *Palm v. 2800 Lake Shore Drive Condominium Ass'n*, 2013 IL 110505.

⁶³ MCC § 2-60-020(b).

⁶⁴ Per the 2021 Budget Hearing Response, the arrest numbers provided are based on individual custodial arrests in which an MCC violation was the first charge.

⁶⁵ As is its usual practice, OIG provided a draft of this report to DOL for comment and response. In response to that draft, DOL affirmed that its approach towards these cases is "to ensure defendants' compliance with the [Gun Offender Registry] Ordinance" and provided OIG with additional records demonstrating DOL's filing of charges against individuals arrested for violations of the Ordinance with some records indicating the individual had since registered. In this publication, OIG has made revisions reflecting the additional information provided by DOL on its approach to violations of the Ordinance. See Appendix F.

This decision to bring offenders into compliance rather than prosecute Ordinance violations appears to be influenced in part by limited resources, the burden of proof needed for conviction, and the minimal penalties ultimately imposed by judges when charges are brought. DOL reported that limited CPD resources are available which are needed to meet the evidentiary burden of proof to establish that an Ordinance violation has occurred. For example, in order to prove an Ordinance registration violation, DOL has to provide a witness, such as a member of the CRU, to testify about the offender's registration. DOL asserted that the demand on CRU personnel to testify in court would be impractical due to the size of CRU. DOL also reported that municipal branch court judges are "somewhat hostile" to Ordinance violation cases. The attorneys stated that the judges view Ordinance violations as offenses requiring compliance rather than adjudication.⁶⁶ Even among the small percentage of cases taken to trial, DOL reported that a successful conviction often results in penalties less severe than is mandated by the Ordinance. DOL attorneys referenced a judge who refused to institute a fine of more than \$50.00 for a gun offender registration violation. Although the Ordinance mandates that violators will incur penalties of "not less than \$300.00 nor more than \$500.00 or be incarcerated for a term not to exceed six months, or both," a DOL attorney stated that "there is not a judge in this county" who would jail someone for violating the Ordinance.⁶⁷ Rather than have DOL "spin [its] wheels" to convict Ordinance violators, attorneys stated that they focus on bringing offenders into compliance.

Ultimately, by not pursuing Ordinance violators, particularly individuals who fail to register as gun offenders, and by not conducting data audits or registrant visitations, CPD risks that the information presented in Chicago's Gun Offender Registry is incomplete and inaccurate. Both DOL and CPD pointed to limited CPD resources as part of the motivation behind each of the agencies' strategies, suggesting that full enforcement of the registry would require a substantial increase in resources from the Department. In addition to these practical concerns, CPD's lack of systematic enforcement of the Ordinance, coupled with DOL's decision to prioritize compliance with the Ordinance over pursuing penalties for violators, raises questions about the Gun Offender Registry's broader purpose and value. In the following section, OIG discusses whether the registry, in its current state, fulfills the original intent of the Gun Offender Registration Ordinance.

⁶⁶ Cases involving MCC violations may be heard by other courts and judges depending on prosecution in coordination with CCSAO.

⁶⁷ MCC §8-26-100.

V | Discussion and Recommendations

As noted in the Background, the Gun Offender Registration Ordinance was passed in 2010 as part of an effort by City Council to provide regulations that both complied with the U.S. Supreme Court's decision in the *McDonald v. City of Chicago* ruling and was "effective in protecting the public from the potentially deadly consequences of gun violence in our City."⁶⁸ The preamble introducing the Ordinance stated that existing state laws were "not sufficient to protect the City from the unique and heightened risk of firearm violence, especially handgun violence, endemic in densely populated urban areas." Although the Ordinance was passed as part of a suite of laws meant to protect residents from "firearm violence," OIG's analysis of its current implementation suggests that the Gun Offender Registry falls short of answering the problem of gun violence.

In support of the passage of the Ordinance and its proposed amendments, City Council members posited that the Gun Offender Registry would serve as a vital community resource, a necessary law enforcement tool, and a crime deterrent for registered offenders. In this section, OIG discusses whether the Gun Offender Registry, in its current state, fulfills each stated purpose. Additionally, Findings 1, 2, and 3 of this report outline deficiencies in the notification processes, registration operations, and the maintenance and enforcement of the City's Gun Offender Registration Ordinance. Together, these shortcomings result in an incomplete and inconsistently accurate Gun Offender Registry. Pursuant to its own Ordinance to promote economy and efficiency in City operations, OIG also endeavors to explore the potential costs and benefits associated with the pursuit of a complete and accurate registry of all individuals with qualifying gun offenses in Chicago.

A | Gun Offender Registry as a Community Resource

According to the *Chicago Tribune*, in 2013, Ald. Burke stated, "[a]n enhanced and comprehensive database of registered gun offenders will provide Chicago residents with the opportunity to alert themselves as to the presence of gun offenders in their own communities."⁶⁹ However, in order to be a vital source of public safety information, communities must both be aware of and utilize the Gun Offender Registry.

In its current state, although CPD policy (Special Order S02-05) requires CPD to disseminate Gun Offender Registry data through a periodic "Community Notification List" provided to specific City and sister agencies (the Chicago Housing Authority, the Board of Education, the Chicago Public Library, and the Chicago Park District), OIG found little evidence that these agencies use gun offender registration information in their operations. From October to December 2022, OIG interviewed leadership from each of these agencies and, aside from Chicago Public Library, the agencies reported that they were unaware of the Gun Offender Registry's existence, and none reported having received a Community Notification List from CPD.⁷⁰ In April 2022, the commanding officer of CRU reported to OIG that the unit did not send out Community Notification Lists and had not done so since at least July 2020 due to delays related to the COVID-19 pandemic. In April 2023, OIG, also a designated recipient agency, received its first Community Notification List since the pause in its dissemination. This April 2023 Community Notification List only contained

⁶⁸ City of Chicago, "Journal of the Proceedings of the City Council," July 2, 2010, PDF page 6.

⁶⁹ Hal Dardick, "Wider gun-crime registry advances."

⁷⁰ The Commissioner of the Chicago Public Library stated they had heard of the registry but had never accessed the public-facing website.

Chicago Police Department, "Special Order S02-05: Criminal Registration and Community Notification."

information regarding sex offender registrants and Murderer and Violent Offender Against Youth registrants. OIG did not receive a Community Notification List including gun offender registrants until July 2023.⁷¹ As of this writing, this is the only Community Notification List OIG has received that contains information regarding gun offenders.

Despite a lack of awareness of the registry, leadership from the sister agencies speculated about how they might use gun offender registration data in their operations. For example, leadership at the Chicago Housing Authority reported that such data could be beneficial to ensure compliance with agency policy; the Board of Education stated that it might be used to maintain geographic awareness for student safety; and the Chicago Public Library reported that it could help to identify patrons with recurring behavioral issues. CPD's policy does not specify the purpose for providing sister agencies with the Gun Offender Registry data nor provide guidance for how it should be used.

In 2021, City Council passed an ordinance creating the Community Commission for Public Safety and Accountability and establishing 22 District Councils, each comprised of three elected community members. The responsibilities of the District Councils include “build[ing] connections between the police and the community,” and ensuring there is a forum where “residents can raise and work to address any concerns about policing in the District.”⁷² Given the District Councils’ position within the community, OIG interviewed select District Council members to gain a sense of the usefulness of the Gun Offender Registry to residents of their Districts. In November and December 2023, OIG interviewed District Council members from the three Districts with the highest number of registered gun offender residents (006 - Gresham, 007 - Englewood, and 011 - Harrison), about the Gun Offender Registry. The District Council members interviewed by OIG all stated that, while shootings and gun violence were a concern among their community members, their communities were generally unaware of the Gun Offender Registry and did not use it. When asked if they saw any potential uses for the registry, rather than using the registry to identify specific gun offender registrants, each of the three District Council members reported that the Gun Offender Registry could be useful as a way to solicit resources, such as to allocate grant money, by demonstrating the high need for employment resources or funding for anti-violence community groups.

However, the District Council members also expressed concern about potential negative consequences of the registry, including employment discrimination and the potential for the public registry with address information to be used for retaliation or targeting registered offenders or their families. The District Council members reported that community members they engaged specifically to discuss the Gun Offender Registry expressed concerns to them, with one District Council member reporting that community members felt that the registry appeared to be “another racist tool” and another District Council member stating they had received concerns that the Gun Offender Registry may be a way to supplement the currently decommissioned gang database.

Other cities have similarly identified unintended consequences of gun offender registries for individuals and communities. A recent study looking at individuals on Baltimore’s publicly available gun offender registry found that by the “most conservative estimates...houses within 0.1 miles from ex-gun offenders’ residences experience an 8.0% decline in value (\$12,632) after these ex-gun

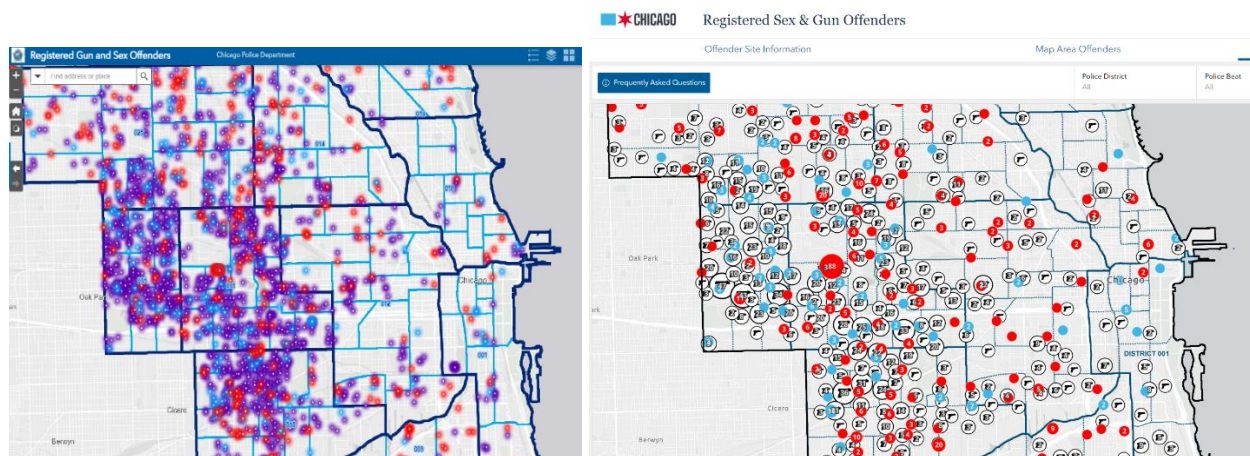
⁷¹ The email contained four separate notification lists by registration type (sex, arson, gun, and Murderer and Violent Offender Against Youth).

⁷² MCC §2-80-070

offenders move in.”⁷³ While the study shows a correlation between the presence of ex-gun offenders and decreased property values, it did not “observe significant increases in crimes following the relocation of ex-gun offenders into the neighborhoods.”

Additionally, there is little evidence to determine the extent to which Chicagoans currently utilize the Gun Offender Registry. In its review, OIG requested data on the number of public views of the Gun Offender Registry within a six-month period. In response, OPSA provided the total usage numbers (41,981 views) for the Registered Sex and Gun Offenders Application. Because the Gun Offender Registry is presented within the same public data application as the Sex Offender Registry on the City’s website, there is currently no way to determine how often the public uses the application for the purpose of viewing Gun Offender Registry information independent from those who access the application to view Sex Offender Registry information. Further, one District Council member reported that, because the gun offender and sex offender information were presented together, the registry itself was confusing to interpret. At the time of this interview, the address of individuals with gun offenses were shown as a purple dot within the application, whereas sex offenders were shown as blue or red dots. The District Council member highlighted a lack of clearly defined color legends to explain the different categories of offenders. Since then, OPSA has revised the Registered Sex and Gun Offenders application, and the residence of individuals with gun offenses are now more distinguishable as they are denoted by gun icons (see Figure 11 below). However, the new application still displays sex and gun offenders within the same map, and therefore prohibits a determination of how often the public seeks to access information from each distinct registry.

Figure 11: Side by side display of previous and current Registered Sex and Gun Offenders Application



Source: OPSA Registered Sex and Gun Offender Application⁷⁴

⁷³ Cheng Keat Tang and Thao Le, "Crime risk and housing values: Evidence from the gun offender registry," *Journal of Urban Economics*, March 2023, accessed March 13, 2024, <https://www.sciencedirect.com/science/article/abs/pii/S0094119022001024>.

⁷⁴ The screenshot on the left was captured on August 17, 2021. The screenshot on the right was taken on August 20, 2024.

Office of Public Safety Administration, "Registered Sex and Gun Offenders," accessed August 21, 2024, <https://experience.arcgis.com/experience/cbfbf35f4e784aa58d5be6a175e63c96/page/Offender-Dashboard/>.

| Could a complete registry serve as a resource for the public?

➤ Yes, but there are associated costs and risks.

In its current state, the Gun Offender Registry may provide some insight for communities into the residents in their area who have previously been convicted of gun crimes. However, in interviews with OIG, District Council members viewed the Registry as an opportunity to provide evidence of resource needs within their communities rather than addressing a public safety concern. Moreover, OIG found that there was generally little awareness of the Gun Offender Registry, even among entities who were supposed to receive specific community notifications from the Department.

While a complete registry may provide information to Chicagoans about residents in their area, for both safety and resource allocation purposes, City Council and the Mayor must evaluate the potential benefit to the public against the potential negative consequences for registered individuals and their communities. Further, to fully evaluate the utility of the registry for Chicago's communities, public access of the Gun Offender Registry should be tracked independent of that of the Sex Offender Registry (see Recommendation 15).

B | Gun Offender Registry as a Law Enforcement Resource

In support of an amendment to the Ordinance in 2013, CPD's then-Chief of Detectives told the *Chicago Sun-Times*, "Having these registrants—knowing who they are—helps policemen on the street. It's an officer safety issue."⁷⁵ Ald. Burke similarly suggested that "[o]fficers responding to calls for help also can check the registry to see if someone known to be at the scene is on the list."⁷⁶ However, City Council has also questioned the value of the registry. In 2021, in response to media reports that violators of the Gun Offender Registration Ordinance were not being prosecuted, Ald. O'Shea stated, "The gun-offender registry is BS. What a colossal waste of resources," and "It creates a lot of useless paperwork."⁷⁷ Further, a former CRU Commander stated that the Department, especially those in charge of the registration unit, "do not care if [the registry] succeeds."⁷⁸ Finally, the deficiencies OIG identified in CPD's ability to ensure the completeness and accuracy of the registry hinder whatever utility the tool might have for law enforcement (see again Findings 1, 2, and 3).

In its review, OIG did not find any CPD directives or guidance that direct CPD members to reference the Gun Offender Registry in Patrol operations such as responding to 911 calls for service or conducting traffic or investigatory stops. While CPD members have the ability to view registry information by searching for a specific individual through the in-vehicle Portable Data Terminal (PDT) laptop, the PDT does not automatically display registry information to CPD members responding to calls for service. Similarly, CPD trainings and guidance for special law enforcement operations, specifically those provided to CPD members conducting search warrants,

⁷⁵ Fran Spielman, "Council expands gun offender registry," *Chicago Sun-Times*, March 14, 2013.

⁷⁶ Hal Dardick, "Wider gun-crime registry advances."

⁷⁷ Frank Main, "Chicago requires convicted gun criminals to register, makes arrests but won't prosecute violators," *February 21, 2021*, accessed March 15, 2024, <https://chicago.suntimes.com/2021/2/12/22268275/gun-registry-registration-law-chicago-lori-lightfoot-enforcement>.

⁷⁸ Shannon Heffernan, "People with sex and gun convictions are required to register with police."

provide numerous examples of law enforcement tools for members to utilize in preparation and to identify concerns for officer safety, but do not refer members to the Gun Offender Registry.⁷⁹

CPD members have access to law enforcement databases that capture the same, and often more comprehensive, information than that contained on the Gun Offender Registry. In Patrol, for example, within the PDT, CPD members can query or receive queries from dispatchers, from both CPD's Citizen Law Enforcement Analysis and Reporting (CLEAR) data application and Illinois' Law Enforcement Agencies Data System (LEADS). According to CPD training materials, "CLEAR provides access to information about crimes and offenders in Chicago and throughout the region," while LEADS provides access to data including Illinois Criminal History Record Information, FOID, and CCL information. These databases provide CPD members with information regarding an individual's arrest history, including arrests for gun charges.

In order to fulfill the intention of the Gun Offender Registry serving as a robust law enforcement resource, the Gun Offender Registry would need to be both complete and utilized by CPD members. In its current state, the Gun Offender Registry does not include individuals who fail to register and may contain out-of-date information for individuals who fail to update the CRU or report for annual registration (see again Finding 3). Therefore, other law enforcement databases likely contain more complete and up-to-date records such as an individual's criminal history or an address provided from a recent arrest, from which CPD members can review and evaluate considerations for officer safety.

| Could a complete registry serve as a tool for law enforcement?

➤ Potentially, but CPD has other tools that may serve the same purpose.

While an accurate and complete registry might provide some useful information to CPD members, given the annual nature of registration and the fact that there will always be some number of individuals who are not in compliance with the Gun Offender Registration Ordinance, utilizing other law enforcement databases in addition to or in place of the registry would remain necessary to ensure the most complete and up-to-date information is reviewed.

C | Gun Offender Registry as a Crime Deterrent

In a February 2017 joint meeting for the Committees on Finance and Public Safety, Ald. Burke and Ald. Reboyras proposed expanding public access to Gun Offender Registry information. They argued that "people who have been convicted of felony gun offenses pose unique dangers to the people of Chicago," and that "such convicted individuals should be monitored to anticipate recidivism and to ensure their prompt apprehension if the convicted offenders commit further crimes."⁸⁰ Ald. Burke, the amendment's primary sponsor, had previously opined in 2013 that gun

⁷⁹ City of Chicago Office of Inspector General, "Final Report – Chicago Police Department's Search Warrant Process," June 28, 2023, <https://igchicago.org/publications/final-report-chicago-police-departments-search-warrant-process/>.

⁸⁰ The proposed 2017 amendment sought to expand the means of access to Gun Offender Registry information, to include means such as the U.S. Postal Service. The proposed change passed the joint committees on Finance and Public Safety in February 2017, but failed to pass City Council in May 2019.

City of Chicago Office of the City Clerk, "Amendment of Municipal Code Sections 2-84-052 and 8-26-080," February 22, 2017, accessed March 13, 2024, <https://ocprodstoragev1.blob.core.usgovcloudapi.net/lsmatterattachmentspublic/dd171d58-3037-418b-9fea-eb597be62b32.pdf>.

offender registries have a “deterrent effect on people who might be tempted to commit gun crimes again.”⁸¹

In interviews with OIG, several District Council members expressed concerns regarding gun violence, specifically shootings in their neighborhoods. However, these members expressed doubt that a registry of individuals with prior gun convictions would address their concerns. For example, one District Council member questioned the registry’s alignment with efforts to combat gun violence, stating that creating a list of past offenders is “not how gun violence works.” This District Council member stated that the individuals who are committing crimes are often not caught by CPD and, therefore, are not convicted nor registered as gun offenders.

In this inquiry, OIG examined the rearrest rate for a sample of individuals registered as gun offenders as of March 21, 2022. However, OIG was unable to assess the impact of the registry alone on crime rates involving guns due to limitations in available data and the many factors that affect crime rates. Isolating the impact of the Gun Offender Registry on registrants’ criminal behavior is complicated by the lack of a sufficiently comparable control group. For example, rearrest rates of registered gun offenders may differ from those of qualified gun offenders who fail to register, as the non-compliant group may have inherent behavioral differences compared to the group of offenders who have complied with registration requirements. Similarly, the rearrest rates for individuals convicted of the same charges in jurisdictions without a gun offender registration requirement or for those convicted prior to the registry’s existence may differ given the many numerous factors that impact gun crime rates over time and by area. As a result, OIG does not make any conclusions as to whether the rearrest rates presented here would be higher or lower in the total absence of the Gun Offender Registry, but instead presents the following data for consideration.

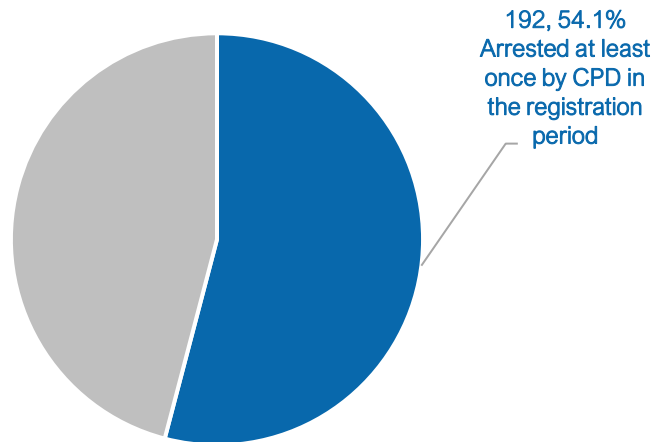
OIG analyzed a random sample of individuals registered as gun offenders as of March 21, 2022 (N=355) to determine the rate of rearrest, specifically examining arrests occurring during the individual’s registration period.⁸² OIG found that of the 355 individuals examined, at least 192 registrants (54.1%) had been arrested by CPD while registered as a gun offender.⁸³ The counts reported here are conservative estimates both in number of arrests included and in the registration period analyzed, as OIG examined only arrests made by CPD and within the four-year period prior to an individual’s registration expiration date. Thus, the figures reported here would exclude any arrests made by non-CPD law enforcement agencies, arrests made after an individual was released from a correctional facility but prior to registering as a gun offender, or arrests made while registered outside the four-year period.⁸⁴ Among arrests that occurred within the registration period of offenders, OIG found that the charges were wide-ranging in severity, from minor traffic violations to homicide.

⁸¹ See again the Background section. See also, Fran Spielman, “City’s ‘gun offender registry’ may be expanded.”

⁸² From the 4,587 records from the gun offender registry provided by CPD in March 2021, OIG determined a sample size of 355 records for further examination at a 95% confidence interval. The 355 records in the sample were randomly selected. OIG examined the sample and determined that it was representative of the overall population of all 4,587 registered gun offenders at that time, both in demographic makeup and conviction type.

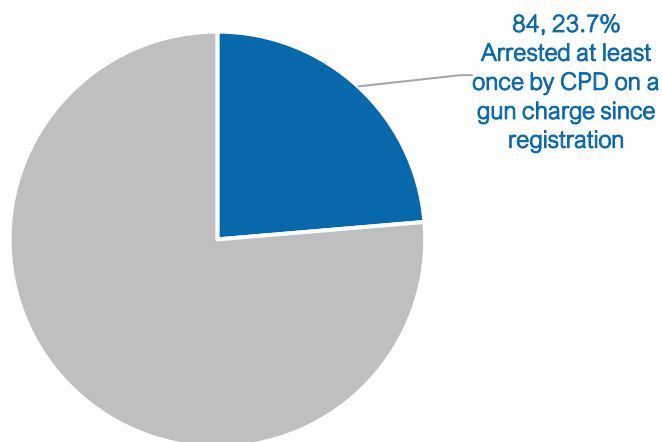
⁸³ The fact of an arrest does not indicate guilt of a criminal offense. This analysis is limited to arrests by CPD within an individual’s registration window and does not examine whether such arrests led to convictions. Further, this analysis does not examine instances of rearrests among convicted gun offenders who never registered.

⁸⁴ It is possible for a gun offender to be properly registered for more than four years if they are reconvicted of a qualifying gun offense during their initial registration period.

Figure 12: Gun Offender Registrants Rearrested by CPD While Registered

Source: OIG analysis

Of the sample analyzed, OIG identified 84 registrants (23.7%) who were rearrested by CPD at least once on gun-related charges during their registration period, including one registrant with six gun-related charges.⁸⁵

Figure 13: Gun Offenders Registrants Rearrested by CPD on Gun-Related Charges While Registered

Source: OIG analysis

⁸⁵ In its analysis of gun-related charges, all arrests OIG identified were for qualifying offenses contained within the Gun Offender Registry. That is, OIG examined the occurrence of arrest for the offenses which themselves would require registration under the Ordinance. The figures reported here include only arrests where OIG was able to confirm charges involving guns. For example, charges such as aggravated assault with a deadly weapon — which may or may not include guns — were excluded unless the presence of guns was indicated by other charges levied in the same arrest.

This data shows that some individuals registered as gun offenders get rearrested by CPD, including arrests for gun-related charges. Specifically, over half of the registered gun offenders analyzed were rearrested during their registration period, with nearly a quarter arrested for a charge involving a firearm.

| Could a fully-enforced registry deter crime?

➤ Unknown.

While the goal of deterring crime and reducing gun violence may be the most compelling component of the Gun Offender Registration Ordinance's stated purposes, it is also the least susceptible to measurement. Even if CPD were able to ensure that all qualified gun offenders residing in Chicago were registered upon release or sentencing, the registry itself is still predicated upon the successful identification, arrest, and conviction of individuals engaged in gun crimes. In addition, not only are there complications in measuring the independent impact of a registry on a type of crime that is influenced by many societal factors, but available data further limits potential analyses. For instance, an arrest is not an indicator of guilt, and therefore arrest rates cannot be used as a true measure of whether an individual has committed a crime. Similarly, court records may provide too narrow of a pool for evaluating the registry's deterrence impact, given the many factors needed to obtain a conviction for a gun charge. Given these complications, even if the Gun Offender Registry contained all convicted gun offenders residing in Chicago, the City will remain limited in its ability to evaluate the deterrent effect of the registry or the Gun Offender Registration Ordinance's impact on gun violence.

| Recommendations

OIG urges the Mayor's Office, City Council, and the Chicago Police Department to undertake a comprehensive evaluation of the ongoing utility and impact of the Gun Offender Registration Ordinance. If, in fact, there is a public safety benefit to law enforcement and to communities in building a robust and comprehensive registry, OIG encourages the City to invest the resources into ensuring it is complete. If not, the City should not continue to pursue an effort that has not proven its utility in creating a safer Chicago.

1. CPD, the Mayor's Office, and appropriate committees of the City Council should work together to conduct a cost/benefit analysis of the efficacy and efficiency of the Gun Offender Registration Ordinance to date and, based on the findings, take appropriate legislative action (MCC § 8-26).

If the City elects to keep the Ordinance, it should implement changes to address the challenges and shortcomings outlined in this report. OIG offers the following recommendations to the City and to CPD in the event that a determination is made to maintain the registry.

OIG makes the following recommendations to appropriate committees of the City Council and the Mayor's Office:

2. Metrics should be defined to assess the effectiveness of the Gun Offender Registration Ordinance.
3. Sufficient resources should be allocated for the enforcement and prosecution of violations of the Gun Offender Registration Ordinance.

OIG makes the following recommendations to CPD, in the event that a determination is made to maintain the registry:

Notification

4. CPD should correct its public-facing "Gun Offender Rules and Regulations" document to contain a complete and current list of qualifying offenses for gun offender registration.
5. CPD should ensure cooperating custodial institutions completing gun offender registration notifications have a clear and current understanding of qualifying conditions for registration, including gun offense and residency qualifications, such as through the creation of a Memorandum of Understanding, regular trainings, and/or other consistent coordination efforts.
 - a. CPD should collaborate with federal authorities and probation departments to ensure qualifying individuals under their jurisdictions are notified of their duty to register as gun offenders.
6. CPD should establish standard operating procedures for the gun offender notification process, including the use of a centralized email address for receipt of Gun Offender Registration Notification forms, and should ensure these are disseminated to cooperating custodial institutions.
7. CPD should review "Bureau of Patrol Special Order 17-03: Gun Offender Registration Mission" to determine the constitutionality of detaining individuals who have not received notice of their duty to register as gun offenders.

Registration

8. CPD should correct and align information about the gun offender registration process—including the locations of its facilities and hours of operation—across all public resources, including its public "Gun Offender Rules and Regulations" document and CPD website, and collaborate with the City to ensure consistency between the City's re-entry website and CPD resources.
9. CPD should update its Gun Offender Registration Notification form (CPD-23.210) to list the correct addresses for gun offender registration sites and disseminate corrected versions of the form to relevant agencies and departments, such as DOL, IDOC, and CCDOC.
10. CPD should review safety and security measures at its criminal registration sites and make changes as appropriate based on the findings of the review.

11. CPD should implement technological and/or procedural solutions to manage the volume of registrants it processes, such as the use of appointments.

Maintenance and Enforcement

12. CPD should modify “Special Order S02-05: Criminal Registration and Community Notification” to accurately reflect its current practices for verification of criminal registrant information, for example, to reflect its use of the Community Notification List in place of a separate quarterly criminal registration list and its discontinuation of registrant visitations.
13. CPD should act in accordance with “Bureau of Patrol Special Order 17-03: Gun Offender Registration Missions” by conducting “Gun Offender Registration Missions” twice per year to bring known violators of the Ordinance into compliance or modify the directive to reflect current Departmental practices.
14. CPD should implement a procedural or technological solution to automatically remove individuals from the registry map whose registration obligation has concluded.
15. CPD should implement a solution to determine public viewership of the Gun Offender Registry independent of the Sex Offender Registry and should solicit community feedback on the online application to ensure the tool is responsive to community needs.

| Management Response

The Mayor’s Office

1. *“The Mayor’s Office appreciates the work of the Public Safety Inspector General on this subject, and will work with CPD, DOL, and the appropriate committees of City Council to evaluate the existing ordinance, taking into consideration the utility of the Gun Offender Registry as a public safety tool, resource for law enforcement, and deterrent to crime.”*
2. *“As part of the above-referenced evaluation, the Mayor’s Office will work with CPD and the appropriate committees of the City Council to define collectable metrics that will enable meaningful assessment of the Gun Offender Registration Ordinance.”*
3. *“As part of the above-referenced evaluation, the Mayor’s Office will work with CPD, DOL, and the appropriate committees of the City Council to determine whether and to what extent additional resources are necessary for the enforcement and prosecution of the Gun Offender Registration Ordinance. These findings will inform any future legislative action or budgetary requests related to the Ordinance.”*

City Council Committee on Police and Fire

“I have had an opportunity to review the above-referenced draft report, and the recommendations made to the Committee on Police and Fire. As Chair, I look forward and

remain committed to working with the Office of the Mayor and city departments by having the necessary committee meetings to assist in the implementation of an effective gun offender registry program, which includes the development of metrics to assess effectiveness of the program.” (See Appendix C).

City Council Committee on Public Safety

“Based on my understanding of committee jurisdictions, the recommendations in the draft report may fall under the purview of a committee other than the Committee on Public Safety. However, I remain amenable to holding hearings on this subject and welcome collaborative action with appropriate committees, the Mayor’s Office, and other City departments.” (See Appendix D).

CPD

1. *“The CPD recognizes the importance of MCC Chapter 8-26 and its impact on the safety of Chicago residents and CPD members. As such, the CPD is willing to work with the Mayor’s Office and City Council to review and strengthen the ordinance in order to achieve its intended outcome.”*
4. *“The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including the 2013 Rules and Regulations document identified here, all with the goal of ensuring that this information is consistent and easily understood across all platforms.”*
5. *“The CPD has already undertaken the efforts described in this recommendation. However, the CPD does not agree that a Memorandum of Understanding is necessary or appropriate.*

The CPD already maintains strong, collaborative relationships with local, state, and federal partners who readily assist with implementing Chapter 8-26. In addition, the CPD ensures that the revised links of any applicable registration information at our website is shared with these partners so that they can meet their obligation in informing and, as appropriate, training their personnel.

Key to the success of this effort is ongoing communication and training between the CPD and its law enforcement partners, including advisories concerning changes in the law and respective procedures within each agency’s jurisdiction.”

6. *“As noted on page 16 of the OIG’s draft report, the CPD has already established a centralized e-mail address and is aware that its law enforcement partners are currently using it. The CPD does not agree that adopting standard operating procedures for implementing Chapter 8-26 is appropriate because these procedures are already set out in CPD Special Orders S02-05 and S02-05-01, which are publicly available at directives.chicagopolice.org. The CPD recognizes that its directives must be periodically reviewed and is coordinating a comprehensive review of all publicly facing information with CPD’s Research & Development Unit.”*
7. *“The CPD is in the process of reviewing Bureau of Patrol Special Order 17-03 to ensure that there are no constitutional concerns regarding “no notice/not registered” gun offenders.”*

8. *"The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including the 2013 Rules and Regulations document identified here, all with the goal of ensuring that this information is consistent and easily understood across all platforms. Once this review is complete, the CPD will coordinate with the Mayor's Office to ensure that public-facing information is both consistent and accurate."*
9. *"The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including the CPD-23.210 form identified here. Once this review is complete, the CPD will coordinate with its law enforcement partners to ensure that they are using only the latest version of CPD-23.210."*
10. *"The CPD has already undertaken this effort and provided the OIG with pictures of how registrants are being accommodated while awaiting their turn to meet with CPD personnel. To the extent that a risk to registrants ever existed, that risk has been addressed and the CPD considers this issue closed."*
11. *"The CPD is coordinating with PSA to implement the Offenderwatch software platform, which should address concerns raised about the increased volume of registrants that the CPD processes. Offenderwatch is a management tool that allows law enforcement agencies to more effectively monitor registered offenders, update the public, and maintain compliance with the applicable Illinois statutes and City of Chicago ordinances. It is currently being used by other municipalities in the state of Illinois to manage their registrant population.*

<https://www.offenderwatch.com/>"
12. *"The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including Special Order S02-05."*
13. *"The Bureau of Patrol is conducting a comprehensive review of its operations under Bureau of Patrol Special Order 17-03, including how to best deploy resources most effectively to ensure that convicted gun offenders achieve compliance with Chapter 8-26. This decision may be impacted by the Workforce Allocation Study being undertaken by Matrix Consulting Group, which is due by the end of 2025."*
14. *"The CPD is coordinating with PSA to implement the Offenderwatch software platform, which should address concerns raised about the increased volume of registrants that the CPD processes. Offenderwatch is a management tool that allows law enforcement agencies to more effectively monitor registered offenders, update the public, and maintain compliance with the applicable Illinois statutes and City of Chicago ordinances. It is currently being used by other municipalities in the state of Illinois to manage their registrant population."*
15. *"The CPD is coordinating with PSA to implement the Offenderwatch software platform, which should address concerns raised about the increased volume of registrants that the CPD processes. Offenderwatch is a management tool that allows law enforcement agencies to more effectively monitor registered offenders, update the public, and maintain compliance with the applicable Illinois statutes and City of Chicago ordinances. It is*

currently being used by other municipalities in the state of Illinois to manage their registrant population."

VI | Conclusion

Since the creation of Chicago's Gun Offender Registration Ordinance in 2010, there has been little evidence demonstrating its impact. In this inquiry, OIG found gaps in gun offender registration notification, inefficiencies in the registration process itself, and an overall lack of proactive enforcement of the Ordinance by the City. These deficiencies result in a current Gun Offender Registry that is incomplete and unreliable, undermining whatever utility the registry might have. OIG makes recommendations to CPD, City Council, and the Mayor's Office to remediate the identified deficiencies in gun offender registration in Chicago and to wholly comply with CPD directives and the Ordinance. OIG, however, acknowledges that full implementation of the recommendations made here would require the allocation of substantial resources. The Gun Offender Registration Ordinance was passed alongside gun regulations in a municipal action with the goal of addressing gun violence in Chicago. Since then, it has been further suggested that the Ordinance could be used to inform communities, aid law enforcement, and deter crime. However, little evidence exists that the Ordinance has functioned as imagined. Without clear objectives and intended outcomes for the Ordinance and the registry, it is unknown what value would come from allocating additional resources to the full enforcement of the Ordinance. OIG urges the City to thoroughly assess the costs and benefits of robust enforcement of the Gun Offender Registration Ordinance.

Appendix A | Qualifying Conviction Statutes for Gun Offender Registration

Criminal Offense	Statutes on the Ordinance
Kidnapping and related offenses	720 ILCS 5/10-2(a)(6) 720 ILCS 5/10-2(a)(7) 720 ILCS 5/10-2(a)(8) 720 ILCS 5/10-3.1(a) - (if the deadly weapon was a firearm) 720 ILCS 5/10-4(a)(1) - (if the dangerous weapon was a firearm)
Assault, Battery, Home Invasion Offenses	720 ILCS 5/12-2(c) - (if a firearm was used or discharged) 720 ILCS 5/12-3.05(e) - (if a firearm was used or discharged) 720 ILCS 5/12-4(b) (if a firearm was used or discharged) 720 ILCS 5/12-11(a)(3) 720 ILCS 5/12-11(a)(4) 720 ILCS 5/12-11(a)(5)
Robbery and vehicular hijacking offenses	720 ILCS 5/18-2(a)(2) 720 ILCS 5/18-2(a)(3) 720 ILCS 5/18-2(a)(4) 720 ILCS 5/18-4(a)(4) 720 ILCS 5/18-4(a)(5) 720 ILCS 5/18-4(a)(6)
Armed Violence	720 ILCS 5/33A-2(a) - (if the dangerous weapon was a firearm) 720 ILCS 5/33A-2(b) 720 ILCS 5/33A-2(c)
UUW	720 ILCS 5/24-1(a)(4) - (firearms only) 720 ILCS 5/24-1(a)(7)(i) 720 ILCS 5/24-1(a)(7)(ii) 720 ILCS 5/24-1(a)(8) (firearms only) 720 ILCS 5/24-1 (a)(9) - (firearms only) 720 ILCS 5/24-1(a)(10) - (firearms only)
UUW by felon or person in prison	720 ILCS 5/24-1.1(a) (firearms only) 720 ILCS 5/24-1.1(b) (firearms only)
Aggravated discharge of a firearm	720 ILCS 5/24-1.2(a)(1) 720 ILCS 5/24-1.2(a)(2) 720 ILCS 5/24-1.2(a)(3) 720 ILCS 5/24-1.2(a)(4) 720 ILCS 5/24-1.2(a)(5) 720 ILCS 5/24-1.2(a)(6) 720 ILCS 5/24-1.2(a)(7) 720 ILCS 5/24-1.2(a)(8) 720 ILCS 5/24-1.2(a)(9)
Aggravated discharge with machine gun or silencer	720 ILCS 5/24-1.2-5(a)(1) 720 ILCS 5/24-1.2-5(a)(2) 720 ILCS 5/24-1.2-5(a)(3) 720 ILCS 5/24-1.2-5(a)(4)

	720 ILCS 5/24-1.2-5(a)(5) 720 ILCS 5/24-1.2-5(a)(6) 720 ILCS 5/24-1.2-5(a)(7) 720 ILCS 5/24-1.2-5(a)(8)
Reckless discharge of a firearm	720 ILCS 5/24-1.5(a) 720 ILCS 5/24-1.5(b)
Aggravated UUW	720 ILCS 5/24-1.6(a)(1) (3)(A) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(B) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(C) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(D) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(E) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(G) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(H) (firearms only) 720 ILCS 5/24-1.6(a)(1) (3)(I) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(A) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(B) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(C) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(D) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(E) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(G) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(H) (firearms only) 720 ILCS 5/24-1.6(a)(2) (3)(I) (firearms only)
Armed habitual criminal	720 ILCS 5/24-1.7(a)(1) 720 ILCS 5/24-1.7(a)(2) 720 ILCS 5/24-1.7(a)(3)
Unlawful possession of a firearm by a street gang member	720 ILCS 5/24-1.8(a)(1) 720 ILCS 5/24-1.8(a)(2)
Unlawful sale of firearms	720 ILCS 5/24-3(A)(a) 720 ILCS 5/24-3(A)(b) 720 ILCS 5/24-3(A)(c) 720 ILCS 5/24-3(A)(d) 720 ILCS 5/24-3(A)(e) 720 ILCS 5/24-3(A)(f) 720 ILCS 5/24-3(A)(g) (firearms only) 720 ILCS 5/24-3(A)(h) 720 ILCS 5/24-3(A)(i) 720 ILCS 5/24-3(A)(j) 720 ILCS 5/24-3(A)(k)
Gunrunning	720 ILCS 5/24-3A
Unlawful possession of firearms and firearm ammunition	720 ILCS 5/24-3.1(a)(1) 720 ILCS 5/24-3.1(a)(2) (firearms only) 720 ILCS 5/24-3.1(a)(3) (firearms only) 720 ILCS 5/24-3.1(a)(4) (firearms only) 720 ILCS 5/24-3.1(a)(5) (firearms only)
Unlawful sale or delivery of firearms – school/public housing	720 ILCS 5/24-3.3

Unlawful sale of firearms by liquor licensee	720 ILCS 5/24-3.4
Unlawful purchase of a firearm	720 ILCS 5/24-3.5(b) 720 ILCS 5/24-3.5(c)
Unlawful use of a firearm in the shape of wireless telephone	720 ILCS 5/24-3.6(b)
Use of a stolen firearm in the commission of an offense	720 ILCS 5/24-3.7(a)
Possession of a stolen firearm	720 ILCS 5/24-3.8
Aggravated possession of a stolen firearm	720 ILCS 5/24-3.9
Defacing identification marks of firearms	720 ILCS 5/24-5(b)
Unlawful possession of an assault weapon ⁸⁶	MCC 8-20-075 unlawful possession of an assault weapon
Unlawful sale of firearms	MCC 8-20-100(a) unlawful sale of firearms
Unlawful discharge of a firearm	MCC 8-24-010 unlawful discharge of a firearm

⁸⁶ The Gun Offender Registration Ordinance lists MCC 8-20-075 unlawful possession of an assault weapon as a qualifying violation, while CPD's Gun Offender Rules and Regulations lists MCC 8-20-020 Unlawful possession of handguns, MCC 8-20-030 unlawful possession of long guns, MCC 8-20-035 Unlawful possession of unregistrable firearms, and MCC 8-24-027 disguised firearms. Language in the ordinance allows for comparable offenses to be considered.

Appendix B | Mayor's Office Response

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Deborah Witzburg
Inspector General

OFFICE OF INSPECTOR GENERAL City of Chicago

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Management Response Form

Inquiry Title and Number: The City of Chicago's Implementation and Enforcement of the Gun Offender Registration Ordinance, #21-0757

Department Name: The Office of the Mayor

Commissioner/Department Head: Mayor Brandon Johnson

Date: 2/21/2025

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
1. CPD, the Mayor's Office, and appropriate committees of the City Council should work together to conduct a cost/benefit analysis of the efficacy and efficiency of the Gun Offender Registration Ordinance to date and, based on	The Mayor's Office appreciates the work of the Public Safety Inspector General on this subject, and will work with CPD, DOL, and the appropriate committees of City Council to evaluate the existing ordinance, taking into consideration the utility of the Gun Offender Registry as a public safety tool, resource for law enforcement, and deterrent to crime.	Ongoing	Mayor's Office, DOL, CPD-IGA, appropriate City Council committees

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
the findings, take appropriate legislative action (MCC § 8-26).			
OIG makes the following recommendations to appropriate committees of the City Council and the Mayor's Office: 2. Metrics should be defined to assess the effectiveness of the Gun Offender Registration Ordinance.	As part of the above-referenced evaluation, the Mayor's Office will work with CPD and the appropriate committees of the City Council to define collectable metrics that will enable meaningful assessment of the Gun Offender Registration Ordinance.	Timeline to be determined	Mayor's Office, DOL, CPD-IGA, appropriate City Council committees

4751



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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
OIG makes the following recommendations to appropriate committees of the City Council and the Mayor's Office: 3. Sufficient resources should be allocated for the enforcement and prosecution of violations of the Gun Offender Registration Ordinance.	As part of the above-referenced evaluation, the Mayor's Office will work with CPD, DOL, and the appropriate committees of the City Council to determine whether and to what extent additional resources are necessary for the enforcement and prosecution of the Gun Offender Registration Ordinance. These findings will inform any future legislative action or budgetary requests related to the Ordinance.	Timeline to be determined	Mayor's Office, DOL, CPD-IGA, appropriate City Council committees

Appendix C | City Council Committee on Police and Fire Response



CITY OF CHICAGO

ALD. CHRIS TALIAFERRO
Chairman

Phone: (312) 744-3510

COMMITTEE ON POLICE AND FIRE
City Hall, Room 305
121 N. LaSalle Street
Chicago, Illinois 60602

May 15, 2025

Tobara Richardson
Deputy Inspector General for Public Safety
231 S. LaSalle St., 12th Floor
Chicago, IL 60604
TRichardson@igchicago.org

Re: Response to Recommendation Made to the Committee on Police and Fire regarding the Office of the Inspector General's Draft Report to the City of Chicago's Implementation and Enforcement of the Gun Offender Registry Ordinance

Dear Deputy Richardson,

I always hope that you are well and remain safe. I have had an opportunity to review the above-referenced draft report, and the recommendations made to the Committee on Police and Fire. As Chair, I look forward and remain committed to working with the Office of the Mayor and city departments by having the necessary committee meetings to assist in the implementation of an effective gun offender registry program, which includes the development of metrics to assess effectiveness of the program.

If you have any questions regarding this correspondence, please feel free to contact me at your earliest convenience.

Sincerely,

A handwritten signature in black ink that reads "C Lt Taliaferro".

Chris Taliaferro
Chairman, Committee on Police and Fire
29th Ward Alderman

Appendix D | City Council Committee on Public Safety Response

121 NORTH LASALLE STREET, Room 300
CHICAGO, ILLINOIS 60602
PHONE: 312-643-2299
EMAIL: office@aldermanhopkins.com
WEBSITE: www.aldermanhopkins.com



CITY OF CHICAGO
CITY COUNCIL

★
BRIAN HOPKINS
ALDERMAN, 2ND WARD

COMMITTEE MEMBERSHIPS

COMMITTEE ON PUBLIC SAFETY
(CHAIRMAN)

AVIATION

COMMITTEES AND RULES

FINANCE

PEDESTRIAN AND TRAFFIC SAFETY

SPECIAL EVENTS, CULTURAL
AFFAIRS AND RECREATION

ZONING, LANDMARKS, AND BUILDING
STANDARDS

April 1, 2025

Tobara Richardson
Deputy Inspector General for Public Safety
Office of Inspector General
trichardson@igchicago.org
Via Email

RE: Responding to recommendations made to the Committee on Public Safety in your Draft Report on the City of Chicago's Implementation and Enforcement of the Gun Offender Registry Ordinance

Deputy Inspector General Richardson:

Based on my understanding of committee jurisdictions, the recommendations in the draft report may fall under the purview of a committee other than the Committee on Public Safety. However, I remain amenable to holding hearings on this subject and welcome collaborative action with appropriate committees, the Mayor's Office, and other City departments.

Sincerely,

Brian Hopkins
Chairman, Committee on Public Safety

Appendix E | CPD Response



Brandon Johnson
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Larry Snelling
Superintendent of Police

March 31, 2025

VIA ELECTRONIC MAIL

Ms. Tobar Richardson (TRichardson@igchicago.org)
Deputy Inspector General for Public Safety
City of Chicago Office of Inspector General
231 South LaSalle Street
Chicago, Illinois 60604

Re: Response to OIG's Draft Report on the City of Chicago's Implementation and Enforcement of the Gun Offender Registry Ordinance, #21-0757

Dear Public Safety Inspector General Richardson:

The Chicago Police Department ("CPD") appreciates the opportunity to provide this response and the opportunity to discuss the Public Safety Inspector General's findings concerning the draft report on the City of Chicago's Implementation and Enforcement of the Gun Offender Registry Ordinance ("Draft Report").

As the OIG is aware, the CPD is responsible for maintaining several registries under both state and local law, including the Sex Offender Registry and the Murder and Violent Offender Against Youth Registry. The Draft Report recognized several of the challenges inherent in the Gun Offender Registry, and identified some areas where the CPD could strengthen the registry.

As reflected in the attached Management Response Form, the CPD is undertaking several initiatives with regard to the Gun Offender Registry. First, the CPD is undertaking a comprehensive review of all public-facing information about the registry to ensure that it is consistent and accurate across all platforms. Second, the CPD is reviewing and updating its directives and forms. Third, the CPD is leveraging technology to assist with implementing the Gun Offender Registry ordinance by implementing the Offenderwatch software system, which is already in use by other police departments around the country. Finally, as suggested in the Draft Report, the CPD is willing to coordinate with the Mayor's Office and City Council to review the Gun Offender Registry Ordinance to evaluate ways in which it can be strengthened to work better for both registrants and the CPD.

Thank you for your review of this important program.

Sincerely,

A handwritten signature in blue ink, appearing to read "Antoinette Ursitti".

Chief Antoinette Ursitti
Bureau of Detectives
Chicago Police Department

Emergency and TTY: 9-1-1 · Non Emergency and TTY: (within city limits) 3-1-1 · Non Emergency and TTY: (outside city limits) (312) 746-6000

E-mail: police@cityofchicago.org · Website: www.cityofchicago.org/police

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Management Response Form

Inquiry Title and Number: The City of Chicago's Implementation and Enforcement of the Gun Offender Registration Ordinance, #21-0757

Department Name: Chicago Police Department

Commissioner/Department Head: Superintendent Larry Snelling

Date: 2/21/2025

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
1. CPD, the Mayor's Office, and appropriate committees of the City Council should work together to conduct a cost/benefit analysis of the efficacy and efficiency of the Gun Offender Registration Ordinance to date and, based on	The CPD recognizes the importance of MCC Chapter 8-26 and its impact on the safety of Chicago residents and CPD members. As such, the CPD is willing to work with the Mayor's Office and City Council to review and strengthen the ordinance in order to achieve its intended outcome.	Unknown	CPD-IGA, Mayor's Office, appropriate City Council committees

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
the findings, take appropriate legislative action (MCC § 8-26).			

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
4. CPD should correct its public-facing "Gun Offender Rules and Regulations" document to contain a complete and current list of qualifying offenses for gun offender registration.	The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including the 2013 Rules and Regulations document identified here, all with the goal of ensuring that this information is consistent and easily understood across all platforms.	Six months	CPD-BOD; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
5. CPD should ensure cooperating custodial institutions completing gun offender registration notifications have a clear and current understanding of qualifying conditions for registration, including gun offense and residency qualifications, such as through the creation of a Memorandum of Understanding, regular trainings, and/or other consistent coordination efforts. a. CPD should collaborate with federal authorities and probation departments to ensure qualifying individuals under their jurisdictions	The CPD has already undertaken the efforts described in this recommendation. However, the CPD does not agree that a Memorandum of Understanding is necessary or appropriate. The CPD already maintains strong, collaborative relationships with local, state, and federal partners who readily assist with implementing Chapter 8-26. In addition, the CPD ensures that the revised links of any applicable registration information at our website is shared with these partners so that they can meet their obligation in informing and, as appropriate, training their personnel. Key to the success of this effort is ongoing communication and training between the CPD and its law enforcement partners, including advisories concerning changes in the law and respective procedures within each agency's jurisdiction.	Ongoing	CPD-BOD

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
are notified of their duty to register as gun offenders.			

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
6. CPD should establish standard operating procedures for the gun offender notification process, including the use of a centralized email address for receipt of Gun Offender Registration Notification forms, and should ensure these are disseminated to cooperating custodial institutions.	As noted on page 16 of the OIG's draft report, the CPD has already established a centralized e-mail address and is aware that its law enforcement partners are currently using it. The CPD does not agree that adopting standard operating procedures for implementing Chapter 8-26 is appropriate because these procedures are already set out in CPD Special Orders S02-05 and S02-05-01, which are publicly available at directives.chicagopolice.org . The CPD recognizes that its directives must be periodically reviewed and is coordinating a comprehensive review of all publicly facing information with CPD's Research & Development Unit.	6 months	CPD-BOD; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
7. CPD should review "Bureau of Patrol Special Order 17-03: Gun Offender Registration Mission" to determine the constitutionality of detaining individuals who have not received notice of their duty to register as gun offenders.	The CPD is in the process of reviewing Bureau of Patrol Special Order 17-03 to ensure that there are no constitutional concerns regarding "no notice/not registered" gun offenders.	6 months	CPD-BOP; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
8. CPD should correct and align information about the gun offender registration process—including the locations of its facilities and hours of operation—across all public resources, including its public "Gun Offender Rules and Regulations" document and CPD website, and collaborate with the City to ensure consistency between the City's re-entry website and CPD resources.	The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including the 2013 Rules and Regulations document identified here, all with the goal of ensuring that this information is consistent and easily understood across all platforms. Once this review is complete, the CPD will coordinate with the Mayor's Office to ensure that public-facing information is both consistent and accurate.	6 months	CPD-BOD; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
9. CPD should update its Gun Offender Registration Notification form (CPD-23.210) to list the correct addresses for gun offender registration sites and disseminate corrected versions of the form to relevant agencies and departments, such as DOL, IDOC, and CCDOC.	The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including the CPD-23.210 form identified here. Once this review is complete, the CPD will coordinate with its law enforcement partners to ensure that they are using only the latest version of CPD-23.210.	6 months	CPD-BOD; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
10. CPD should review safety and security measures at its criminal registration sites and make changes as appropriate based on the findings of the review.	The CPD has already undertaken this effort and provided the OIG with pictures of how registrants are being accommodated while awaiting their turn to meet with CPD personnel. To the extent that a risk to registrants ever existed, that risk has been addressed and the CPD considers this issue closed.	N/A	N/A

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
11. CPD should implement technological and/or procedural solutions to manage the volume of registrants it processes, such as the use of appointments.	The CPD is coordinating with PSA to implement the Offenderwatch software platform, which should address concerns raised about the increased volume of registrants that the CPD processes. Offenderwatch is a management tool that allows law enforcement agencies to more effectively monitor registered offenders, update the public, and maintain compliance with the applicable Illinois statutes and City of Chicago ordinances. It is currently being used by other municipalities in the state of Illinois to manage their registrant population. https://www.offenderwatch.com/	6 months	CPD-BOD; PSA

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
12. CPD should modify "Special Order S02-05: Criminal Registration and Community Notification" to accurately reflect its current practices for verification of criminal registrant information, for example, to reflect its use of the Community Notification List in place of a separate quarterly criminal registration list and its discontinuation of registrant visitations.	The CPD has already begun a comprehensive review of public-facing information concerning MCC Chapter 8-26, including Special Order S02-05.	6 months	CPD-BOD; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
13. CPD should act in accordance with "Bureau of Patrol Special Order 17-03: Gun Offender Registration Missions" by conducting "Gun Offender Registration Missions" twice per year to bring known violators of the Ordinance into compliance or modify the directive to reflect current Departmental practices.	The Bureau of Patrol is conducting a comprehensive review of its operations under Bureau of Patrol Special Order 17-03, including how to best deploy resources most effectively to ensure that convicted gun offenders achieve compliance with Chapter 8-26. This decision may be impacted by the Workforce Allocation Study being undertaken by Matrix Consulting Group, which is due by the end of 2025.	1 year	CPD-BOP; CPD-R&D

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
14. CPD should implement a procedural or technological solution to automatically remove individuals from the registry map whose registration obligation has concluded.	The CPD is coordinating with PSA to implement the Offenderwatch software platform, which should address concerns raised about the increased volume of registrants that the CPD processes. Offenderwatch is a management tool that allows law enforcement agencies to more effectively monitor registered offenders, update the public, and maintain compliance with the applicable Illinois statutes and City of Chicago ordinances. It is currently being used by other municipalities in the state of Illinois to manage their registrant population.	6 months	CPD-BOD; PSA

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
15. CPD should implement a solution to determine public viewership of the Gun Offender Registry independent of the Sex Offender Registry and should solicit community feedback on the online application to ensure the tool is responsive to community needs.	The CPD is coordinating with PSA to implement the Offenderwatch software platform, which should address concerns raised about the increased volume of registrants that the CPD processes. Offenderwatch is a management tool that allows law enforcement agencies to more effectively monitor registered offenders, update the public, and maintain compliance with the applicable Illinois statutes and City of Chicago ordinances. It is currently being used by other municipalities in the state of Illinois to manage their registrant population.	6 months	CPD-BOD; PSA

Appendix F | DOL Response

**Department of Law's Response to the Office of Inspector General's Report on
"The City of Chicago's Implementation and Enforcement of the Gun Offender
Registration Ordinance"**

In response to Section IV(C) of the City of Chicago Office of Inspector General's ("OIG") inquiry report, "The City of Chicago's Implementation and Enforcement of the Gun Offender Registration Ordinance" ("Report"), the City of Chicago Department of Law ("DOL") is obligated to clarify and correct the OIG's Findings in the Report in order to avoid leaving a misleading or incomplete impression with the public regarding the actions taken by DOL in enforcing the provisions of Chapter 8-26 of the Municipal Code of Chicago ("MCC").

It is concerning that this OIG inquiry and report contain unsupported assertions and reflect a fundamental misunderstanding of core legal principles and prosecutorial processes. The audit, as presented, is flawed, incomplete, and offers skewed analyses that misrepresent the realities surrounding the implementation and enforcement of the Ordinance. The Department of Law urges the OIG to reevaluate its findings relevant to the prosecution of the ordinance and correct these mischaracterizations through a more rigorous and informed assessment of the relevant data, facts, and legal framework. Failure to do so not only undermine the OIG's statutory obligation to produce accurate and objective reports pursuant to Chapter 2-56 of the Municipal Code of Chicago but also constitutes a disservice to the residents of Chicago, who rightly expect and deserve transparency, accountability, and integrity from the Office of Inspector General.

The City of Chicago, through DOL, prosecutes violations of Chapter 8-26 of the MCC. The OIG states in its Report that "DOL often declines to prosecute those violations." See Report p. 31. This OIG finding is incorrect. In support, the OIG's Report analyzed 443 arrests and found that 403 arrests resulted in non-suited dispositions "where charges were dismissed because prosecution was declined." *Id.* The Report further states "that despite laws and directives requiring CPD and DOL to take specific actions regarding the maintenance and enforcement of the Gun Offender Registry [Ordinance] ("Ordinance"), the OIG found that both CPD and DOL have chosen not to fully implement the Ordinance requirements." *Id.* As to DOL, the OIG's conclusion is unjustified and reveals a fundamental misunderstanding about the purposes of prosecuting under ordinances and statutes.

As an initial matter, the OIG concedes that it has not done a thorough analysis. Without fully analyzing or reviewing the circuit court cases of the 589 arrests, pursuant to Chapter 8-26 of the MCC—over a 21-month period, the OIG reaches a false conclusion that DOL "declines to prosecute those violations." *Id.* In fact, the OIG, on page 13 of the Report, admits that "due to the limitations of Cook County conviction data (see Finding 1), OIG was unable to assess the completeness of the Gun Offender Registry and CPD's enforcement efforts for gun offender registration." The OIG's willingness to draw false inferences from incomplete data and its insistence upon publishing an incomplete investigation is troubling given the OIG's charge to investigate the performance and efficiency of the City's government and its employees.

According to the Illinois Supreme Court Rules Professional Conduct, “[t]he duty of a public prosecutor is to seek justice, not merely to convict.” *Rule 3.8 - Special Responsibilities of a Prosecutor*, Ill. Sup. Ct. R. 3.8. The OIG, in its Report, either disregards or is unaware of this guiding ethical principle in reaching its findings. To further clarify DOL’s position, we offer an explanation of misdemeanor prosecutions. A misdemeanor prosecution commences at the filing of the complaint with a court. Given that Chapter 8-26 of the MCC allows for potential jail time as penalty, the matter proceeds under the Illinois Rules of Criminal Procedure (“IRCP”) in circuit court. The IRCP provide a defendant in a gun registry violation with all the safeguards guaranteed to all criminal defendants—the right to a lawyer, automatic discovery, and the requirement that the case is proven beyond a reasonable doubt in front of a trier of fact. Every element of a violation must be proven beyond a reasonable doubt including the requirement—pursuant to Section 8-26-055 of the MCC—that “every gun offender subject to this chapter shall be given **individual notice, in writing, of the gun offender’s duty to register**.” Additionally, pursuant to Section 8-26-100 of the MCC “any person who violates any provision of this chapter . . . shall, **upon conviction**, be fined no less than \$300.00 nor more than \$500.00 or be incarcerated for a term not to exceed six months, or both . . . (emphasis added).”

The OIG disregards basic legal principles critical to evaluate the propriety of DOL’s enforcement actions pursuant to the Ordinance. Rather than focusing on the number of cited defendants brought into compliance (something the OIG doesn’t bother to report), the OIG erroneously finds that DOL “has chosen not to fully implement the Ordinance requirements.” But of course, this assumes that full implementation of the Ordinance requires DOL prosecutors to seek fines and/or jail time for each defendant charged with a violation. This assumption is incorrect and fails to consider the realities of a prosecutor’s ethical obligations, the court’s authority to provide the defendant with supervision options, and the legal limitations faced when proceeding to a trial in a misdemeanor branch court in the Circuit Court of Cook County.

Pursuant to 720 ILCS 5/2-5, a conviction means a judgment of conviction or sentence entered upon a plea of guilty or upon a verdict or finding of guilty of an offense, rendered by a legally constituted jury or by a court of competent jurisdiction authorized to try the case without a jury. If judgment is withheld, the plea, verdict, or finding of guilty is not a conviction under Illinois law unless and until judgment is entered. Pursuant to 730 ILCS 5/5-6-3.1, “when a defendant is placed on supervision, the court shall enter an order for supervision specifying the period of such supervision and shall defer further proceedings in the case until the conclusion of the period.” The court shall defer entering any judgment on the charges until the conclusion of the supervision. At the conclusion of the supervision period, if the court determines that the defendant has successfully complied with all of the conditions of the supervision, the court shall discharge the defendant and enter a judgment dismissing the charges. Discharge and dismissal upon a successful conclusion of a disposition of supervision shall be deemed without adjudication of guilt and shall not be termed a conviction for purposes of disqualification or disabilities imposed by law upon conviction of a crime. For example, a judge trying misdemeanor cases has the authority to order a form of

supervision by continuing the matter until the defendant gains compliance with the Ordinance by registering. In essence, the Courts can still dismiss the case without a judgment of conviction, by imposing a form of supervision and, possibly, as a term of that supervision require the defendant to register under the City's Gun Registry Ordinance. This is the approach most courts and DOL attorneys—within their prosecutorial discretion—pursue. The Department of Law attorneys are not merely “non-suiting” Ordinance violations as the OIG so cavalierly suggests. See Report p. 31. Prosecutors are properly handling these matters within their discretion and, in fact, prosecuting these Ordinance violations by offering means for defendants to comply with their registration requirements rather than seeking a penalty in the form of a fine or jail time.

Further, DOL's decision to ensure defendants' compliance with the Ordinance is not, as the OIG concludes, based on what “appears to be influenced by limited resources.” See Report p. 32. Rather, attorneys assigned to prosecute these matters recognize the limitations—outside of their control—to impose fines and/or jail time for these violations. Instead, DOL attorneys have used the opportunities provided by gun offender arrests to facilitate compliance with the City's Gun Registry Ordinance, which one might argue is the more just outcome—ensuring that the purpose of the Ordinance is achieved. While legitimate questions may exist as to the purpose and value of the Ordinance, it is not DOL's decision making or prosecutorial priorities that raise these questions.



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For further information about this report, please contact the City of Chicago Office of Inspector General, 231 S. LaSalle Street, 12th Floor, Chicago, IL 60604, or visit our website at igchicago.org.

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