



2. Professor Belden Fields, Political Science 361 Lincoln Hall, 605 E. Springfield Ave, M/C 452 Champaign, IL 61820, is expected to testify that he put the City of Champaign on notice of Officer Rush's unlawful behavior and tendency to use excessive force by unreasonably punching people and other means when Professor Fields had a sit down meeting with then Mayor Don Gerard and Councilman/Deputy Mayor Tom Bruno together with Myron Scruggs. Professor Fields is expected to testify that, among the matters discussed was the excessive force used by Officer Rush against Mr. Scruggs and the need for a civilian police review board that could provide meaningful oversight to the Champaign Police Department.
3. Barbara Kessel, Courtwatch/Books To Prisoners, 202 S. Broadway Ave, Urbana IL, is expected to testify that she was present at the meeting between Professor Fields, Mayor Gerrard, Councilman Bruno, and Myron Scruggs, and is expected to testify about the substance of the meeting consistent with Professor Belden's anticipated testimony described above.

Investigation continues. Plaintiff reserves the right to identify additional witnesses and documents as his investigation continues and reserves the right to rely upon any witness, document, video or other evidence disclosed by the defendants in this case.

DATED: June 30, 2016

Respectfully submitted,

PRECIOUS JACKSON

BY: /s/ Shneur Nathan  
Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I, Shneur Nathan, an attorney, certify that on June 30, 2016, I sent via electronic mail, a copy of the attached **Plaintiff's Fed. R. Civ. P. 26 (a) Disclosure** to counsel at the addresses identified on the attached service list.

/s/ Shneur Nathan

**Service List**

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