



U.S. Department of Justice

Civil Rights Division
Federal Coordination and Compliance Section
Disability Rights Section

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November 14, 2024

CERTIFIED, RETURN-RECEIPT REQUESTED

Paula Crouch, Sangamon County Sheriff
Sangamon County Sheriff's Office
1 Sheriff's Plaza
Springfield, Illinois 62701

Chris Mueller, Emergency Telephone System Department Director
Sangamon County Emergency Telephone System Department
2000 Shale Road
Springfield, Illinois 62703

John C. Milhiser, Sangamon County State's Attorney
Sangamon County State's Attorney's Office
200 S. Ninth Street, Room 402
Springfield, Illinois 62701

Re: Sangamon County Sheriff's Office, Sangamon County, and Sangamon County
Central Dispatch System
DJ Nos. 171-24-16 and 204-24-142

Dear Sheriff Crouch and Messrs. Mueller and Milhiser:

This letter notifies you that the United States Department of Justice, through the Civil Rights Division's Federal Coordination and Compliance Section and Disability Rights Section (collectively, "DOJ"), has reviewed information alleging that the Sangamon County Sheriff's Office ("SCSO"), Sangamon County, and the Sangamon County Central Dispatch System ("SCCDS") may be in violation of the nondiscrimination requirements of the following statutes and implementing regulations:

- Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d to 2000d-7, and its

- implementing regulations, 28 C.F.R. Part 42, Subpart C (collectively, “Title VI”);
- The Omnibus Crime Control and Safe Streets Act, 34 U.S.C. § 10228(c)(1), and its implementing regulations, 28 C.F.R. Part 42, Subpart D (collectively, “Safe Streets Act”); and
- Title II of the Americans with Disabilities Act, 42 U.S.C. §§ 12131-34, and its implementing regulation, 28 C.F.R. Part. 35 (collectively, “Title II” or “ADA”).

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. 42 U.S.C. § 2000d. The Safe Streets Act prohibits discrimination on the basis of race, color, national origin, religion, and sex in programs and activities receiving specified law enforcement assistance funds. 34 U.S.C. § 10228(c)(1). SCSO is a recipient of federal financial assistance from DOJ, including Safe Streets Act funds.

Under Title II, “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 U.S.C. § 12132; 28 C.F.R. § 35.130(a); *see also* 28 C.F.R. § 35.130(b)(1)(i)-(iii). Further, Title II prohibits failing to make reasonable modifications to policies, practices, or procedures necessary to avoid disability discrimination unless doing so would fundamentally alter the nature of the service, program, or activity. 28 C.F.R. § 35.130(b)(7)(i). Title II applies to state and local governments and their agencies and departments, including Sangamon County, SCSO, and SCCDS. *See* 42 U.S.C. § 12131.

DOJ has reviewed reports about an SCSO deputy’s fatal shooting of Sonya Massey, a Black woman experiencing a mental health crisis, while responding to Ms. Massey’s 911 call for help on July 6, 2024. The incident raises serious concerns about SCSO’s interactions with Black people and people with behavioral health disabilities,¹ as well as SCSO’s policies, practices, procedures, and training regarding community policing, bias-free policing, response to behavioral health crises, use of force, de-escalation, affirmative duty to intervene, affirmative duty to render medical aid, and body-worn camera (“BWC”) policies and compliance. Additionally, the incident and prior 911 calls involving Ms. Massey in the days before her death indicate possible issues with Sangamon County, SCSO, and SCCDS’s emergency response and dispatch system. Finally, DOJ has reviewed reports concerning SCSO’s employment practices, including allegations that a lack of racial diversity at SCSO impacts SCSO’s provision of policing services in communities of color. These allegations collectively raise concerns of race and disability discrimination prohibited by Title VI, the Safe Streets Act, and Title II.

As a recipient of federal financial assistance from DOJ, SCSO must provide access to information that can be used to determine whether it is complying with applicable nondiscrimination requirements. *See, e.g.*, 28 C.F.R. § 42.106(c) (Title VI implementing regulations); 28 C.F.R. § 42.207 (Safe Streets Act implementing regulations). Failure to provide access to information necessary to determine compliance could result in the suspension or termination of federal financial assistance or a civil suit to enforce the rights of the United States.

¹ People with behavioral health disabilities are individuals who have a diagnosable mental illness and/or substance use disorder. This population includes individuals with co-occurring intellectual or developmental disabilities.

See, e.g., 28 C.F.R. § 42.108. Title VI, Safe Streets Act, and their applicable implementing regulations provide opportunities to resolve identified concerns through voluntary compliance prior to engaging in suspension and/or termination of federal financial assistance or further proceedings to enforce the rights of the United States for violations of Title VI and the Safe Streets Act. *See* 28 C.F.R. § 42.106(a); 28 C.F.R. § 42.205(c)(3)(iii) - (c)(4).

Regardless of whether public entities receive federal funds, Title II authorizes DOJ to investigate complaints of disability discrimination, informally resolve investigations where appropriate, make findings of fact and conclusions of law where a violation is found and resolution is not achieved, and attempt to negotiate voluntary resolutions after finding violations. 28 C.F.R. Part 35, Subpart F. DOJ also is authorized to take appropriate action, including filing an action in federal district court, to enforce the ADA if voluntary compliance is not achieved after a finding. 28 C.F.R. § 35.174.

We have included requests for information below. The decision to issue these requests for information does not reflect any conclusions as to SCSO's compliance with Title VI, the Safe Streets Act, or Title II. Nor does the issuance of these requests for information reflect any conclusions about Sangamon County's or SCCDS's compliance with Title II.

We understand that a criminal prosecution of former deputy Sean Grayson is ongoing. Our investigation is not intended to interfere or conflict with that prosecution. If you think any of the information requested in this letter would compromise that prosecution, please let us know.

Initial Information Request and Next Steps

To further facilitate our investigation of this matter, please provide the following documents and information by December 14, 2024 (30 days). Please preserve all relevant or related documents and information. We ask that you contact us within ten (10) days of the date of this letter, or by November 25, 2024, to discuss the production format of responsive documents and electronically stored information.

1. The name, address, telephone number, and email address of the individual(s) to whom this office should direct any future questions and correspondence. Please indicate if they have authority to negotiate a settlement of this matter.
2. Organizational chart(s) for SCSO, Sangamon County, and SCCDS reflecting their structures and chains of command at all times from January 1, 2020, to the present.
3. The name, address, telephone number, and email address for ADA Coordinators for SCSO, Sangamon County, and SCCDS, if any.
4. A copy of all documents related to Sonya Massey. Please include:
 - a. all phone logs;
 - b. all dispatch records;
 - c. all transcripts and recordings of 911 calls seeking help for Sonya Massey;

- d. all transcripts, recordings, and other documents related to the dispatch of officers or personnel to respond to 911 calls for assistance for Sonya Massey;
 - e. a list of all SCSO deputies or other personnel on the scene responding to any call(s), 911 or otherwise, related to Ms. Massey (including the deputy who responded on July 6, 2024, together with Deputy Grayson). Provide each individual's position and rank, as well as the bureau, division, and/or unit to which the individual was assigned; and
 - f. copies of all reports related to Sonya Massey, and, in any instance where a report was not completed, provide applicable date(s) and location(s) to which SCSO or any other type of responder that SCCDS can dispatch responded.
5. All dash camera and BWC footage related to the events listed in response to Request No. 4.
6. For the period January 1, 2020, to the present, identify whether SCSO has provided or currently provides any form of alternative response models when responding to behavioral health crises or interacting with someone with a behavioral health disability, such as co-responder teams, mobile crisis teams, or Crisis Intervention Training (CIT) programs. Provide a description of each form of alternative response and all related policies.
7. For the period January 1, 2020, to the present, all SCSO policies, procedures, rules, guidelines, standards of practice, and related documents that address:
- a. community policing;
 - b. bias-free policing;
 - c. interacting with people with disabilities;
 - d. response to behavioral health crises;
 - e. use of force;
 - f. de-escalation;
 - g. affirmative duty to intervene;
 - h. affirmative duty to render medical aid, and
 - i. BWCs.

Include all versions in effect during any part of the relevant time period.

8. For the period January 1, 2020, to the present, a description of all SCSO training(s) on:
- a. community policing;
 - b. bias-free policing;
 - c. interacting with people with disabilities;
 - d. response to behavioral health crises;
 - e. use of force;
 - f. de-escalation;
 - g. affirmative duty to intervene;
 - h. affirmative duty to render medical aid, and

i. BWCs.

Include the method of delivery of the training; the identity of the trainer; the frequency of delivery; and any related training materials.

9. For the period January 1, 2020, to the present, identify all codes SCCDS uses to categorize calls, including all codes that can be assigned to a call involving a behavioral health crisis or person with a behavioral health disability.
10. For the period January 1, 2020, to the present, identify all possible responders SCCDS can dispatch to a call related to a behavioral health crisis or someone with a behavioral health disability.
11. For the period January 1, 2020, to the present, identify all SCCDS policies, procedures, rules, guidelines, standards of practice, and related documents that address identifying calls involving someone with a behavioral health disability; responding to calls involving behavioral health crises; and interacting with someone with a behavioral health disability.
12. For the period January 1, 2020, to the present, a description of all SCCDS training on interacting with people with disabilities and handling calls involving behavioral health crises. Include the method of delivery of the training; the identity of the trainer; who has been trained; when the training took place; the frequency of delivery; and any related training materials.
13. A copy of all training records for SCSO Deputy Sean Grayson and the other SCSO deputy who responded to Ms. Massey's 911 call on July 6, 2024. Include the date(s) of training, the method of delivery of the training, and the associated training materials.
14. Provide the names of all individuals involved in developing, coordinating, implementing, administering, or participating in SCSO's deputy recruitment and selection processes (including individuals administering any psychometric exams); the dates they were involved in the recruitment or selection process; the positions they held when they were involved in the recruitment or selection process; and whether they are currently employed by SCSO or Sangamon County. If they are not currently employed by SCSO or Sangamon County, please provide their last known address, phone number, and email address.
15. For the period January 1, 2020, to the present, a description of SCSO's hiring process for deputies, including recruitment, background check, psychometric evaluation, reference, and selection processes.
16. For the period January 1, 2020, to the present, a description of SCSO's hiring process for lateral transfers for deputies, including recruitment, background check, psychometric evaluation, reference, and selection processes.

17. For the period January 1, 2020, to the present, all SCSO policies, procedures, rules, guidelines, standards of practice, and related documents that address SCSO's hiring of deputies, including recruitment, background check, reference, and selection processes.
18. For the period January 1, 2020, to the present, a list of all candidates for SCSO deputy positions. For each candidate, please provide the following information:
 - a. Race and/or ethnicity;
 - b. Sex;
 - c. Date of application;
 - d. If hired, date of hire;
 - e. If disqualified, date of and reason for disqualification;
 - f. Whether the candidate had prior law enforcement experience, i.e., whether the candidate was a lateral hire; and
 - g. Whether the candidate has any family members currently or previously employed by SCSO.
19. A complete copy of the post-selection personnel and internal affairs files of Deputy Grayson and the other deputy who responded to Sonya Massey's home on July 6, 2024, including any complaints and investigation-related information related to these deputies.
20. For the period January 1, 2020, to the present, all SCSO traffic and pedestrian stop data disaggregated by race.
21. For the period January 1, 2020, to the present, all SCSO use of force data disaggregated by race.
22. For the period January 1, 2020, to the present, all SCSO dispatch logs, including date and time of the call for service, description, location, and SCSO response time.
23. For each calendar year starting with 2020, state how many 911 calls SCCDS received, and of the 911 calls received, state how many:
 - a. sought help for a person experiencing a possible behavioral health crisis;
 - b. included information that the person for whom help was sought has a behavioral health disability.
24. For the calls identified in response to Request No. 23, please identify how many of those call resulted in a response from SCSO and how many of those calls resulted in a response from each of the other types of responders that SCCDS can dispatch.
25. For the period January 1, 2020, to the present, a description of SCSO's processes for SCSO personnel and members of the public to file formal or informal complaints alleging discrimination by SCSO deputies or other personnel. Please include a copy of any complaint forms, procedures, policies, notices, and any other documents related to this process.


26. For the period January 1, 2020, to the present, all written complaints or reports related to discrimination based on race, ethnicity, national origin, or disability made to SCSO. Please include a description of how the complaint or report was addressed or investigated and any resolution and provide all related documents and all dash camera and BWC footage related to the police interaction or incident underlying the complaint.
27. For the period January 1, 2020, to the present, all written complaints or reports related to discrimination based on race, ethnicity, national origin, or disability made to SCCDS. Please include a description of how the complaint or report was addressed or investigated and any resolution, and provide all related documents related to the call or incident underlying the complaint.
28. Any other information you would like DOJ to consider.

This letter addresses only the matters discussed and does not cover any other issues regarding compliance with Title VI, the Safe Streets Act, the ADA, or other federal laws. Under the Freedom of Information Act (“FOIA”), DOJ may be required to release information and related correspondence and records shared by recipients and complainants upon request. If we receive a FOIA request, we will seek to protect, to the extent provided by law, information that is subject to an applicable FOIA exemption, including personal information that, if released, could constitute an unwarranted invasion of privacy.


Title VI, the Safe Streets Act, and the ADA also prohibit retaliation. Under Title VI, this includes any action to “intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege” under Title VI. 28 C.F.R. § 42.107(e). The ADA similarly prohibits retaliation against anyone who exercises their rights under the ADA or participates in an ADA investigation. 42 U.S.C. § 12203. Individuals who believe that they have been a target of retaliation may file a complaint with DOJ.

We appreciate your cooperation in this matter. Be assured that all the information that you provide will be carefully considered. We will afford you the opportunity to work cooperatively with DOJ to address any concerns and resolve this matter before taking more formal actions. If you have any questions or concerns regarding this letter or wish to arrange a meeting, please contact Lauren Lovett at lauren.lovett@usdoj.gov and Cheryl Rost at cheryl.rost@usdoj.gov. Please be advised that we may request additional documents after our initial review.

Sincerely,



Lauren Lovett
Bharathi A. Venkatraman



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