

2. The Decree states that an independent monitor will report to the Court on the Defendants' compliance with its terms, and further provides that the Monitor and class counsel are entitled to various documents in order to track compliance. In addition to the documents listed in the Decree, the Decree states as follows:

If Plaintiffs believe that additional types of documents are necessary in order to evaluate the Defendants' substantial compliance with the Consent Decree, Plaintiffs shall submit a written request to Defendants and explain why they are necessary for their review; if Defendants refused Plaintiffs' request, Plaintiffs may seek an order from the Court directing the Defendants to provide the records if Plaintiffs demonstrate that the request was reasonable and that the particular requested records are necessary to evaluate the Defendants' substantial compliance with the Consent Decree.

Consent Decree ¶ 34

3. Between December 22, 2014 and January 26, 2015, defense counsel and Class Counsel exchanged a number of e-mails, attached as Exhibit One, regarding the outstanding document requests. *See* Group Ex. A. Class Counsel, pursuant to the terms of the Consent Decree, requested "an explanation of how youths will be appointed counsel and how counsel will be notified of their appointment." *Id.* (E-mail from Sheila Bedi to Deborah Beltran (Dec. 22, 2014, 16:25 CST)). Class Counsel also requested information as to the qualifications of appointed counsel and the compensation structure of the vendors. *Id.* Specifically, Class Counsel requested "a summary of the vendor's background and qualifications" as well as confirmation "that appointed counsel will be compensated both for the work they do during preliminary and final revocation hearings and for all the required prep work – including meeting with youth in advance of the hearings." *Id.*

4. Defense counsel responded by providing only the names of the vendors. *See* Ex. A. (E-mail from Sheila Bedi to Deborah Beltran (Jan. 5, 2015, 9:20 CST)). They then claimed that the names of the vendors were sufficient to meet the request as to the qualifications of

appointed counsel. *Id.* (E-mail from Deborah Beltran to Sheila Bedi (Jan. 12, 2015, 12:15 CST)). Defense counsel further claimed that any documentation regarding “the appointment process, including notification and provision of documents to the attorneys” was not covered by the Consent Decree and thus did not need to be produced. *Id.* They stated, in addition, that under the explicit terms of the Decree, Plaintiffs were not entitled to either “compensation arrangements for the attorneys” or “the proposals submitted by the attorneys selected.” *Id.* In reply, Class Counsel reminded defense counsel of the requirement that documents be produced as necessary to evaluate substantial compliance with the Consent Decree, set forth above. *See* Ex. A. (E-mail from Sheila Bedi to Deborah Beltran (Jan. 14, 2015, 13:22 CST)). Class Counsel also gave notice that, if defense counsel refused to produce the documents as required by paragraph 34 of the Decree, Class Counsel would seek an order directing the defendants to produce the necessary records. *Id.*

5. Defense counsel then responded by again stating that the documents sought by Class Counsel “are not listed among those available to Class Counsel.” Ex. A. (Letter from Deborah Beltran to Sheila Bedi (Jan. 15, 2015)). While acknowledging that paragraph 34 required the production of documents necessary to evaluate substantial compliance, they asserted that they were “aware of no provision” of the Consent Decree relating to the issues raised by Class Counsel’s request. *Id.* Defense counsel further claimed that “Class Counsel’s requests overstep the carefully delineated boundaries” between Class Counsel and the independent monitor, and that Class Counsel’s request would “constrain vendor selection.” *Id.* Class Counsel responded—in a final communication—that Plaintiffs’ request would not constrain vendor selection since it only “seeks information pertaining to the qualifications of the counsel chosen by the State to comply with a court-ordered mandate.” Ex. A. (Letter from

Alexa Van Brunt to Deborah Beltran (Jan. 21, 2015)). Class Counsel further contended that, because “the Consent Decree clearly contemplated the appointment of *effective* counsel,” the documents requested were necessary to evaluate substantial compliance.

6. The documents and information sought by Plaintiffs and which the Defendants refuse to produce concern 1) the qualifications of the counsel who will appointed to members of the Plaintiffs class; 2) the compensation structure for appointed counsel (how are counsel paid and for what tasks are they paid); and 3) the procedure(s) for appointing counsel. Each of these documents is essential to allow Class Counsel to effectively monitor the Decree, as set forth below:

- a. **Qualifications for appointed counsel.** The Decree clearly contemplates that appointed counsel will be effective advocates—that is, that their presence will protect the due process rights of the Plaintiff class. Class counsel seeks information about the background and training of each appointed counsel in order to better understand whether these individuals have the qualifications required to provide effective representation.
- b. **Compensation structure.** Under the terms of the Decree, the Defendants are required to provide sufficient resources to ensure that class members are represented at each stage of the parole process—from the preliminary hearing through the appeal. Consent Decree ¶ 14. Class counsel seeks information about the compensation provided to appointed counsel in order to determine if the Defendants have provided the resources necessary to compensate appointed counsel at each stage of parole proceedings.

- c. **Procedure for appointing counsel.** Class counsel seeks information about how and when attorneys are appointed to represent class members. This information is required to ensure that, prior to any parole hearing, appointed counsel have adequate time to meet with class members, review any necessary documents and conduct any investigation. If the Defendants appoint counsel for class members mere minutes before that class member must appear for a parole hearing, the purpose of appointed counsel (to protect class members due process rights) will be entirely subverted because class counsel will not have sufficient time to counsel his or her client or understand the allegations levied against the client.

7. Defendants attempt to argue that this information should be provided solely to the independent monitor and that class counsel has no right to this information. This argument fails because, as explained above, the Decree clearly provides that class counsel may access documents necessary to evaluate the Defendants' compliance. Further, courts have long recognized that the presence of an independent monitor in no way usurps the right of class counsel to monitor compliance with a Consent Decree. As the 10th Circuit held in *Duran v. Carruthers*: “[C]ounsel argues that because of the Special Master, and the defendants’ own monitoring of its degree of compliance, plaintiffs’ monitoring is unnecessary and duplicative. With this argument we do not agree. To so hold would mean that the plaintiffs must accept reports of the Special Master and the defendants’ own compliance officer at face value and they would be unable to make any real challenge, backed with facts established by monitoring, to such reports. *See, e.g., McDonald v. Armontrout*, 860 F.2d 1456 (8th Cir. 1988) (“perseverance and a watchful eye” enabled plaintiffs to file a motion for contempt, to secure a compliance

monitor and to obtain an agreement supplementing consent decree).” 885 F.2d 1492, 1495 (10th Cir. 1989).

8. Here too, in order to effectively represent the Plaintiff class, Class counsel must have the opportunity to obtain necessary information concerning the State’s compliance with the Decree, above and beyond what will be reported by the independent monitor.

WHEREFORE, the Plaintiffs request that this Court enter an order requiring that the Defendants provide to class counsel documents that convey the following information: (1) the qualifications of the counsel who will appointed to members of the Plaintiffs class; (2) the compensation structure for appointed counsel; and 3) the procedure(s) for appointing counsel.

Respectfully submitted:

/s/Sheila A. Bedi
Class Counsel

Alexa A. Van Brunt
Sheila A. Bedi
Roderick and Solange MacArthur Justice Center
Northwestern University School of Law
375 E. Chicago Avenue
Chicago, Illinois 60611
(312) 503-1336
Counsel for the Plaintiff class

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that she served the foregoing document via the Court's CM/ECF system on February 5, 2015.

/s/ Sheila A. Bedi



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

January 26, 2015

Via U.S. Mail and Electronic Mail

Sheila A. Bedi
Roderick and Solange MacArthur Justice Center
Northwestern University School of Law
375 East Chicago Avenue
Chicago, Illinois 60611

Re: *M.H. v. Monreal, 12-cv-8523*

We are in receipt of your January 21, 2015 letter, which now requests different "information" than that requested in your email of January 14, 2015, which was the basis of our January 25, 2015 response; it is difficult to respond when the target is in perpetual motion, and it is unfair to imply that we are being non-responsive when the requests morph between your communications.

We will address your numbered items slightly out of order due to the redundancy in some of your requests. In their second category, Class Counsel seeks to know [w]hether the State intends to employ the screening process as set forth in the consent decree, or whether counsel will be appointed all youth in DJJ custody," as well as "mechanics of the class counsel appointment process, including how youth will be appointed counsel and how counsel will be notified of their appointment to represent youth." Although we note that the consent decree does not entitle Class Counsel to "information," but, rather, "documents" (Paragraph 34), we will address some of your requests, without waiving our rights under the decree as to deny future requests for information, rather than documents. As an initial matter, we have already provided you with some of this information. In fact, as you acknowledged in your December 22, 2014, email, we had already told Class Counsel (over a month ago), that Defendants intend to appoint counsel for all youth, as contemplated in Paragraph 42 of the consent decree; Defendants, of course, reserve the right to employ the screening/assessment mechanisms set forth in the consent decree in the future. Next, it is our understanding that there currently are not documents related to the appointment process, but that attorneys who expressed a willingness to work at each facility are assigned to youth on a rotating basis (i.e., if three attorneys share a facility, each would get every third case), and that the Defendants have been working with the attorneys to determine their preferences for the receipt of information and assignments, within agency resources and the timing requirements of the consent decree.

Next, Class Counsel's letter raises attorney "compensation" in two places (within point 1 and as point 3). We continue to fail to see any utility in this request—no provision in the consent decree requires Defendants to compensate attorneys in any particular manner, and Class Counsel is aware (from discussions after the entry of the consent decree and our November 25, 2015 email that included a link to the full bid solicitation) that the attorneys participated in a competitive bidding process in which they freely engaged and quoted their own rates. <http://www.purchase.state.il.us/ipb/IllinoisBID.nsf/firmBidDocFrameset?ReadForm&RefNum=22034545&DocID=6B2B034F5FB16F9386257D58006F804F&view=viewNoticesOpenByDate> Had you reviewed the items within the solicitation, you would have seen that the bid solicitation required bidders to quote a rate format (each attorney could quote an hourly, daily, or per case rate and choose the DJJ facilities at which they would provide services, see link for "Pricing Model for Legal Services Solicitation"), for providing the following services: "preparation for and presentation of witnesses and evidence at both preliminary and final revocation hearings," with chosen attorneys required to "ensure coverage for all hearings, under the deadlines established in the M.H. consent decree," see link for "MHvMonreal PRB Solicitation for Legal Services." We provided you with the bid solicitation that contained all of this information over two months ago.

Finally, Class Counsel requests "[d]ocuments concerning the identity of appointed counsel, their compensation,¹ and their qualifications to fulfill this role." Again, the first portion of this request seeks information that was long ago provided to Class Counsel. On December 23, 2014, we emailed you to provide the "identity of appointed counsel." As for their qualifications, you seem to acknowledge, in your failure to ground your request in any term of the consent decree (as Paragraph 34 requires when you request documents not specifically set forth within it), that no particular "qualifications" for appointed counsel are set forth in the decree. You state on page 2 of your letter that you would need to know attorney qualifications to determine their effectiveness—but how could you argue that an attorney is "ineffective" based solely on his or her "qualifications?" We have seen no case that approaches effectiveness of counsel in this manner; instead, it is counsel's performance in the course of representation that is the relevant consideration.² Your argument, in fact, reinforces our concern that Class Counsel seeks attorney qualifications solely to attempt to argue, without any stated performance concerns, much less any approaching the level that might implicate the terms of the consent decree, that the State should have either conducted its solicitation process differently or chosen different bidders through that process.

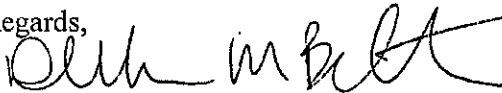
Notably, your letter fails to even address the other chief concerns we outlined in our January 25 letter as to your request for this information: (1) that the consent decree, which the court also approved after the parties had engaged in extensive negotiations, intentionally excluded terms that would constrain vendor selection; and (2) that the consent decree also explicitly and intentionally limits Class Counsel's role and access to documents regarding appointed counsel to avoid duplicated efforts of agency staff and even the appointed attorneys, as

¹ We have already addressed compensation, above.

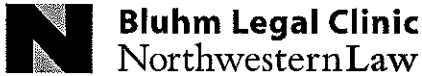
² Of course, isolated performance issues are not the subject of the consent decree, which charges the independent Monitor with ensuring that there are not "systemic barriers" preventing the attorneys from providing "zealous representation"; their individual qualifications cannot be a "systemic barrier."

compared to the independent Monitor, who has an intentionally broader access to documents and personnel. To now contend that you are not bound by these limits, which are expressly set forth in the terms of the consent decree to which you agreed, is untenable.

Regards,



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Roderick and Solange MacArthur Justice Center

January 21, 2015

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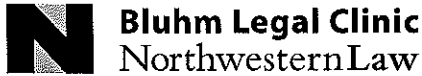
Dear Deb and Mike,

We write in response to your letter of January 15th. While Plaintiffs' counsel does not intend for our communications to be contentious, in order to effectively represent our clients, we are entitled to obtain key information concerning the implementation of the consent decree. This includes the following, which we have requested multiple times:

- (1) Documents concerning the identity of appointed counsel, their compensation, and their qualifications to fulfill this role.
- (2) Whether the State intends to employ the screening process, as set forth in the decree, or whether counsel will be appointed to all youth in DJJ custody. Relatedly, the mechanics of the class counsel appointment process, including how youth will be appointed counsel and how counsel will be notified of their appointment to represent youth.
- (3) Confirmation that appointed counsel will be compensated both for the work they do during the preliminary and final revocation hearings and for all work completed in preparation of these hearings, including meeting with youth in advance of the hearings.

Frankly, we are surprised you are not willing to disclose this information, most of which is arguably subject to FOIA and thus available for public consumption. Class counsel are clearly entitled to access these documents under the decree. Pursuant to paragraph 34, if "Plaintiffs believe that additional types of documents are necessary in order to evaluate the Defendants' substantial compliance with the Consent Decree, Plaintiffs shall submit a written request to Defendants and explain why they are necessary for their review." The purpose of this section, as stated in that same paragraph, is to provide Plaintiffs the necessary materials "to evaluate the Defendants' substantial compliance with the Consent Decree."

Each of Plaintiffs' requests clearly concern the Defendants' substantial compliance with the decree. Whether the Defendants have elected to "forego screening," for instance, is a matter specifically set



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forth in paragraph 42. As for the other requests, the consent decree clearly contemplated the appointment of *effective* counsel to youth. Class counsel should be able to determine whether qualified (and sufficiently compensated) counsel are in fact being appointed. Contrary to the assertion in your January 15th correspondence, our request does not “constrain vendor selection,” but rather seeks information pertaining to the qualifications of the counsel chosen by the State to comply with a court-ordered mandate.

We hope that we can achieve a resolution to these issues this week. That said, if you choose not to turn over the requested documents, we will seek intervention by the Court next week.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexa Van Brunt'.

Alexa Van Brunt
Counsel for Plaintiffs

cc: Sheila Bedi and Alan Mills



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

January 15, 2015

Via U.S. Mail and Electronic Mail

Sheila A. Bedi
Roderick and Solange MacArthur Justice Center
Northwestern University School of Law
375 East Chicago Avenue
Chicago, Illinois 60611

Re: *M.H. v. Monreal, 12-cv-8523*

We are disappointed at Class Counsel's unnecessary assumption of a contentious tone in your email of January 14, 2015. We have a long road ahead in regard to the consent decree, and hostility and unprovoked threats of court action at this early stage do not bode well for the future. We anticipate that, in the future, Class Counsel will in good faith attempt to resolve any disputes that arise prior to threatening, much less seeking, Court intervention. It is unreasonable to reference Court action without even allowing Defendants a chance to review, much less respond to, the additional information that you provided for the first time yesterday.

Plaintiffs have invoked Paragraph 34 of the consent decree in requesting three categories of documents: (i) explaining the appointment-of-counsel process, including notification and provision of documents to attorneys; (ii) providing information as to compensation arrangements for appointed counsel; and (iii) comprising the proposals submitted by the attorneys selected to represent youths in parole proceedings. As Defendants noted in their January 12, 2015 email, however, it is clear even from a cursory glance at Paragraph 34 that these documents are not listed among those available to Class Counsel. Nevertheless, when requesting the items, you did not provide any explanation of why you felt such items were "necessary" for Class Counsel "to evaluate the Defendants' substantial compliance with the Consent Decree," as required by Paragraph 34.

When we pointed out that Class Counsel's request did not comply with the requirements of Paragraph 34, you yesterday provided additional information, submitting that Class Counsel needs "information regarding the qualifications and compensation of the attorneys contracted . . . to determine if they have the requisite experience and resources required"¹ to represent youth in

¹ We note that Plaintiffs' requests were not limited to merely documents setting forth "qualifications" and "compensation" as you represent in your email; Defendants, however, assume that your January 14, 2015 email narrowed your request to those items referenced within it. In any case, that we fail to see the utility

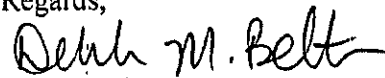
parole revocation proceedings. This explanation does not reference any provision of the consent decree, much less explain why these items are necessary for Class Counsel to evaluate "substantial compliance" with such provision, and we are aware of no provision relating to these issues. The consent decree, in fact, intentionally excludes any terms that would constrain vendor selection, which occurs pursuant to state law and procedures.

Similarly, the Consent Decree carefully defines the roles of the independent Monitor and Class Counsel; Class Counsel's monitoring role (particularly where appointed counsel is concerned) under the consent decree is intentionally narrower than that of the independent Monitor. The independent Monitor, by design, and in deference to his knowledge in this field, has broad access both to agency documents related to consent decree compliance and to personnel, including appointed counsel and certain agency staff. (Consent Decree, ¶¶ 33-34). In contrast, Class Counsel's monitoring role is narrower— (1) the classes of documents Class Counsel may request are specifically listed in Paragraph 34, which sets a heavy burden for requesting additional categories of documents, and (2) Class Counsel's role as to appointed counsel during the independent Monitor's appointment is limited to being present at interviews of appointed counsel that are conducted by the independent Monitor. (Consent Decree, ¶¶ 33, 34; see also Consent Decree ¶ 39 (permitting Class Counsel to interview appointed counsel only after entering the Class Counsel Monitoring phase)).

Class Counsel's requests overstep the carefully-delineated boundaries between Class Counsel's monitoring role and that of the independent Monitor explicitly set forth in the consent decree. This delineation was intentional and designed to control costs and avoid any unnecessary duplication of efforts both of agency staff, on the one hand, and the independent Monitor and Class Counsel, on the other.

Defendants remain willing to work with Class Counsel as to the documents that fall within the terms and spirit of Paragraph 34. Class Counsel also may, of course, pursuant to paragraph 33, observe hearings (at which appointed counsel are present). To that end, we attach the schedule for upcoming preliminary and final revocation hearings.

Regards,



Deborah Morgan Beltran
Michael T. Dierkes
Assistant Attorneys General
Office of the Illinois Attorney General
100 West Randolph Street, 13th floor
Chicago, Illinois 60601
(312) 814-3599/3672

Enclosure

in Plaintiffs reviewing the bid proposals of successful bidders; certainly, nothing in the consent decree permits Class Counsel to second-guess the selection of service providers pursuant to state processes.

Sheila A Bedi

From: Sheila A Bedi
Sent: Wednesday, January 14, 2015 1:22 PM
To: 'Beltran, Deborah'; Alexa Anne Van Brunt
Cc: 'dmuhammad@hotmail.com'; Dierkes, Michael; alanmills@comcast.net
Subject: RE: Class Counsel Document requests

Deb: Thank you for your response. Paragraph 34 of the Consent Decree provides that “If Plaintiffs believe that additional types of documents are necessary in order to evaluate the Defendants’ substantial compliance with the Consent Decree, Plaintiffs shall submit a written request to Defendants and explain why they are necessary for their review; if Defendants refuse Plaintiffs’ requests Plaintiffs may seek an order from the Court directing the Defendants to provide the records....”

We have requested information regarding the qualifications and compensation of the attorneys contracted to provide representation to our clients to determine if they have the requisite experience and resources required to defend children against allegations that they have violated their parole. If you are refusing to provide us with this information, we will seek an order from the Court. Please advise by the end of this week—we will plan to file a motion with the Court early next week if your position remains unchanged.

Additionally, we intended to observe parole proceedings and to meet with class members this week, but have not yet received a schedule of hearings. Please forward both a schedule and any requirements the DJJ intends to impose upon us regarding hearing observations and meeting with class members ASAP. We intend to meet with class members immediately after their parole hearings. If we don’t receive this information this week, we will request that the Court order the Defendants to produce it in the motion referenced above.

Thank you for your immediate attention these matters, -s.

From: Beltran, Deborah [mailto:DBeltran@atg.state.il.us]
Sent: Monday, January 12, 2015 12:15 PM
To: Sheila A Bedi; Alexa Anne Van Brunt
Cc: 'dmuhammad@hotmail.com'; Dierkes, Michael
Subject: MH: Class Counsel Document requests

Dear Sheila,

We have reviewed Class Counsel’s requests for several categories of documents, and we appreciate the clarification that Class Counsel’s requests are made pursuant to paragraph 34 of the consent decree. We understand that Class Counsel is requesting the following categories of documents: (1) schedules of preliminary and final revocation proceedings of youth; (2) names of the attorneys who will be representing youths in parole proceedings; (3) explaining the appointment

process, including notification and provision of documents to the attorneys; (4) compensation arrangements for the attorneys; and (5) the proposals submitted by the attorneys selected to represent youths in parole proceedings.

As to category (1), we have requested the schedules of parole proceedings and will forward those to you after we receive them from the client. As to category (2), we have already provided Class Counsel with the names of the attorneys who will be representing youths in parole proceedings.

For categories (3)-(5), even to the extent such documents exist, paragraph 34 of the consent decree specifically lists the types of documents that shall be available to Class Counsel upon request, and the documents you have requested do not fall within paragraph 34. Please note that this is not meant to indicate any position as to the documents the Monitor may request and/or review.

Regards,
Deb

PLEASE NOTE MY PHONE NUMBER HAS CHANGED

Deborah Morgan Beltran
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100 West Randolph Street, 13th Floor
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dbeltran@atg.state.il.us

Sheila A Bedi

From: Sheila A Bedi
Sent: Wednesday, January 07, 2015 11:57 AM
To: Beltran, Deborah (DBeltran@atg.state.il.us); Dierkes, Michael
Cc: Alexa Anne Van Brunt; alanmills@comcast.net; 'hotmail'
Subject: FW: MH Compliance

Deb and Mike: We are requesting the information described below pursuant to paragraph 34 of the Consent Decree. This is my third request. If we do not receive this information by the end of the week, we will file a motion to enforce before Judge Wood. Additionally, during the next two weeks, we intend to observe hearings and interview class members. Please provide us with a schedule of parole hearings at your very earliest convenience. We appreciate your immediate attention to these matters. Thanks, s

From: Sheila A Bedi
Sent: Monday, January 05, 2015 9:20 AM
To: Beltran, Deborah (DBeltran@atg.state.il.us); Dierkes, Michael
Cc: Alexa Anne Van Brunt; alanmills@comcast.net; 'hotmail'
Subject: FW: MH Compliance

Deb and Mike: I hope you both had wonderful holidays. We appreciate you providing us with the names of the vendors, but you have not responded to items 2 and 3 below. Please do so at your very earliest convenience. Additionally, please forward to us the proposals submitted by the successful vendors. Thank you for your immediate attention to this matter. Best, S.

From: Sheila A Bedi
Sent: Monday, December 22, 2014 4:25 PM
To: Beltran, Deborah (DBeltran@atg.state.il.us); Dierkes, Michael
Cc: Alexa Anne Van Brunt; alanmills@comcast.net; 'hotmail'
Subject: MH Compliance

Dear Mike and Deb: I am writing to follow-up on my previous email requesting information about the *MH* decree. Please provide the following information at your very earliest convenience.

- 1) The names and contact information of all vendors who were selected to provide legal services pursuant to the Decree. Please also include a summary of the vendor's background and qualifications.
- 2) Based on our previous correspondence, it is our understanding that Counsel will be provided to every youth facing revocation proceedings and that no screening will occur. But we still do not have any information regarding the mechanics of the counsel appointment process. Please provide us with an explanation of how youth will be appointed counsel and how counsel will be notified of their appointment. Please also

explain how counsel will be provided with the required documents—including the parole revocation reports and any attachments.

- 3) Please confirm that appointed counsel will be compensated both for the work they do during preliminary and final revocation hearings and for all required prep work—including meeting with youth in advance of the hearings.

We remain deeply concerned that this information has not been provided to us—especially since we are only 1 ½ weeks away from the deadline. If we do not receive this information we will seek court intervention immediately after the Christmas holiday. Thanks for your immediate attention to these matters.

Sheila A. Bedi
Associate Clinical Professor
Northwestern University School of Law
Roderick and Solange Macarthur Justice Center
375 E. Chicago Ave., 8th Floor
Chicago, IL 60611
312-503-2492

Sheila A Bedi

From: Sheila A Bedi
Sent: Monday, January 05, 2015 9:20 AM
To: Beltran, Deborah (DBeltran@atg.state.il.us); Dierkes, Michael
Cc: Alexa Anne Van Brunt; alanmills@comcast.net; 'hotmail'
Subject: FW: MH Compliance

Deb and Mike: I hope you both had wonderful holidays. We appreciate you providing us with the names of the vendors, but you have not responded to items 2 and 3 below. Please do so at your very earliest convenience. Additionally, please forward to us the proposals submitted by the successful vendors. Thank you for your immediate attention to this matter. Best, S.

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Sent: Monday, December 22, 2014 4:25 PM
To: Beltran, Deborah (DBeltran@atg.state.il.us); Dierkes, Michael
Cc: Alexa Anne Van Brunt; alanmills@comcast.net; 'hotmail'
Subject: MH Compliance

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- 1) The names and contact information of all vendors who were selected to provide legal services pursuant to the Decree. Please also include a summary of the vendor's background and qualifications.
- 2) Based on our previous correspondence, it is our understanding that Counsel will be provided to every youth facing revocation proceedings and that no screening will occur. But we still do not have any information regarding the mechanics of the counsel appointment process. Please provide us with an explanation of how youth will be appointed counsel and how counsel will be notified of their appointment. Please also explain how counsel will be provided with the required documents—including the parole revocation reports and any attachments.
- 3) Please confirm that appointed counsel will be compensated both for the work they do during preliminary and final revocation hearings and for all required prep work—including meeting with youth in advance of the hearings.

We remain deeply concerned that this information has not been provided to us—especially since we are only 1 ½ weeks away from the deadline. If we do not receive this information we will seek court intervention immediately after the Christmas holiday. Thanks for your immediate attention to these matters.

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