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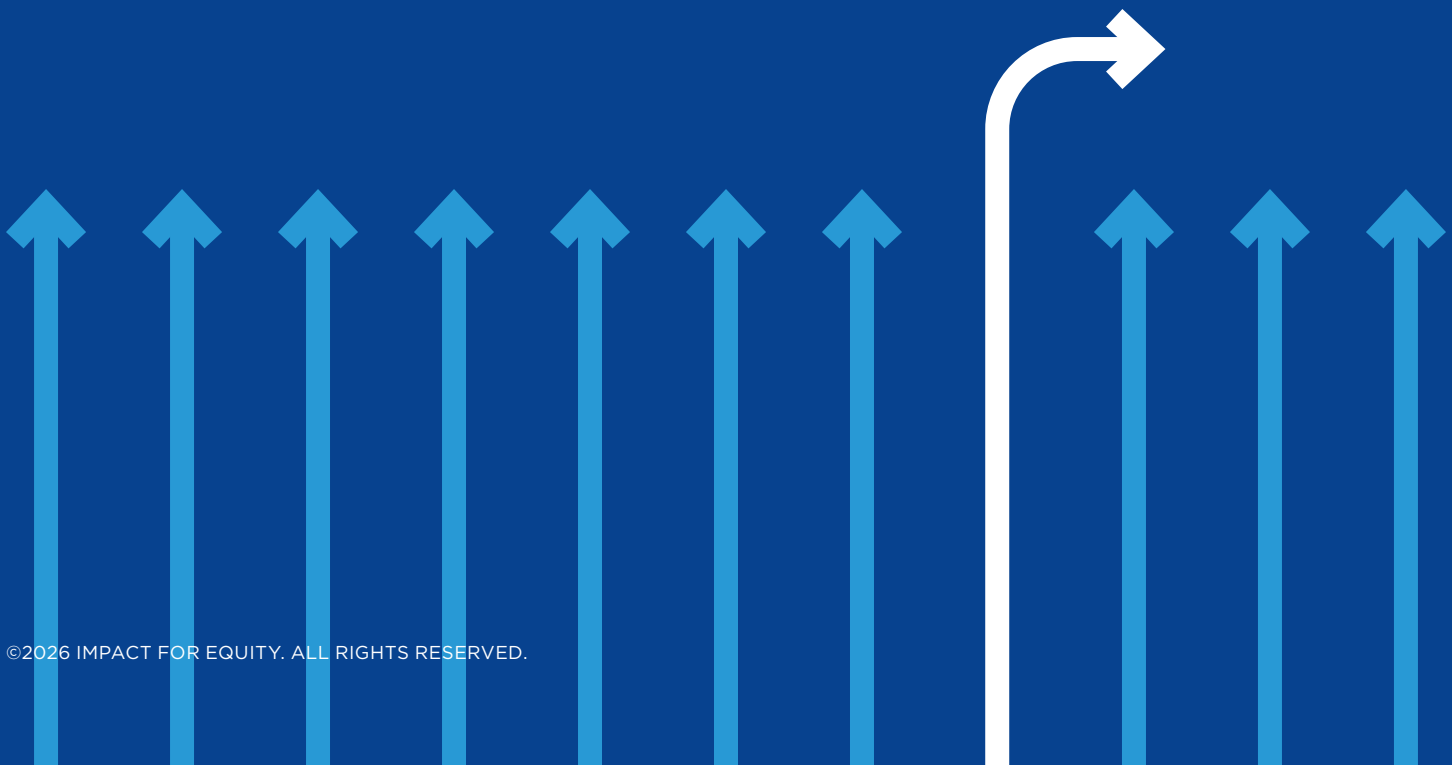
Inconsistent Implementation of Citation in Lieu of Arrest in Chicago and Illinois

MARCH 2026



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About Impact for Equity

Impact for Equity is a public interest law and policy center that has been at the front lines of social justice in the Chicago region and Illinois for over 55 years. Known for its innovative and effective advocacy for racial and economic equity, today Impact for Equity is deeply engaged in advancing systemic change in housing and criminal legal systems.

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Executive Summary

In 2021, Illinois passed a law requiring police officers to issue a citation at the site of arrest for certain low-level crimes instead of bringing a person into custody, a reform commonly known as citation in lieu of arrest (CILOA). This powerful tool has the potential to minimize the compounding detrimental effects of criminalization and incarceration while simultaneously freeing up public safety resources. As law enforcement departments across the state interpret and implement this law, uneven application and deviation from the statute have contributed to inconsistent use of CILOA within Chicago and beyond.

This report reviews implementation of CILOA with a focus on Illinois' largest police agency, the Chicago Police Department (CPD), and anecdotal evidence from six other jurisdictions. The CPD data suggests four main conclusions regarding the implementation of CILOA in Chicago:

1. CILOA rates have gone down since implementation began in September 2023.
2. The types of offenses a person is accused of appear to significantly impact whether they are ultimately granted CILOA.
3. In Chicago, the rates of CILOA vary substantially depending on location.
4. A person's race appears to have a relationship with whether a person is granted CILOA.

A review of CPD's policy and training illuminates misinterpretations of the CILOA law that may be limiting its application. Ultimately, this report raises concerns about how consistently and effectively CILOA is being implemented. Based on these findings, we offer recommendations to bring Illinois and Chicago into closer compliance with the law. With greater clarity, oversight, and enforcement, departments can fully implement CILOA, and we as a state can reduce unnecessary and harmful criminal legal system contacts.

Introduction

The 2021 Illinois Safety, Accountability, Fairness and Equity Today (SAFE-T) Act was a landmark criminal justice reform package that touched policing, jails, prisons, and more, making much needed improvements to our state's criminal legal system.[1] Understandably, much of the focus in the wake of the law's passage was on its historic abolishment of cash bail in Illinois. However, the law included many other provisions aimed at reducing the harmful impacts of contacts with the criminal legal system, including citation in lieu of arrest (CILOA).

CILOA is a diversionary reform designed to limit police and jail contact for people who are accused of minor crimes. It requires police to issue a citation and release someone after an encounter rather than taking them into custody for unnecessary detention and processing. The reform has the potential to limit harmful criminal legal system interactions and conserve public safety resources. However, that potential hinges on effective implementation, and there has not yet been an evaluation of whether the new CILOA law has been implemented effectively in Illinois.

This report bridges that gap by producing a preliminary analysis of the available CILOA data and policy to examine the successes, challenges, and concerns with its implementation in select jurisdictions across the state, focusing primarily on the Chicago Police Department (CPD). The analysis shows that, while there are examples of the reform being implemented successfully, concerns remain as to whether CILOA is being fully implemented in alignment with the intent of the legislation across the state. To address those gaps at this critical early stage, this report makes recommendations on how Illinois can improve implementation, address noncompliance, and ultimately achieve greater diversion from prolonged criminal legal system contact in Illinois.

Background

CILOA requires the police to issue a citation for minor crimes and release someone after an encounter rather than taking them into custody for further detention and processing. A citation, or ticket, is issued to the person detained, either requiring them to pay a fine or appear in court at a later date.

Chiefly, the reform has the potential to limit unnecessary and harmful criminal legal system interactions by limiting further system contact.[2] An arrest can have a destabilizing effect on people's lives, including inducing financial burdens through loss of employment or income.[3] The Prison Policy Initiative (PPI), a nonpartisan think tank, views CILOA as a solution to help break the cycle of repeatedly jailing people whose actions do not pose a risk to public safety and instead stem from other issues, such as mental health or financial needs.[4] PPI found that nationally, one in five individuals who were jailed once were jailed again within 12 months.[5] The majority of those jailed, per their findings, had been incarcerated for non-violent offenses.[6] Limiting criminal legal system contact can help reduce harm to those who are already disproportionately facing compounding negative effects from the criminal legal system. This

An arrest can have a destabilizing effect on people's lives, including inducing financial burdens through loss of employment or income.

[1] Safety, Accountability, Fairness, and Equity-Today Act, Public Act 101-652 (2021).

[2] International Association of Chiefs of Police, *Citation in Lieu of Arrest: Examining Law Enforcement's Use of Citation Across the United States*, 13, 17-18 (2016), https://www.theiacp.org/sites/default/files/all/c/Citation%20in%20Lieu%20of%20Arrest%20Literature%20Review.pdf.

[3] *Id.* at 14-15.

[4] Alexi Jones & Wendy Sawyer, *Arrest, Release, Repeat: How Police and Jails are Misused to Respond to Social Problems*, Prison Policy Initiative (Aug. 2019), https://www.prisonpolicy.org/reports/repeatarrests.html.

[5] Emily Widra & Wendy Sawyer, *Who is jailed, how often, and why: Our Jail Data Initiative collaboration offers a fresh look at the misuse of local jails*, Prison Policy Initiative (Nov. 27, 2024), https://www.prisonpolicy.org/blog/2024/11/27/jail_bookings/.

[6] *Id.*; *see also* Jones & Sawyer, *supra* note 4.

population is disproportionately Black and living in historically disenfranchised areas with less access to educational and economic opportunity.[7]

CILOA can also conserve public safety resources. R Street Institute, a nonpartisan free market think tank, uplifts citations for low-level, non-violent offenses as a cost-effective reform that can reduce jail crowding, increase institutional safety, improve trust between officers and communities, reduce the risk of harm to officers and police-civilian shootings, and increase law enforcement capacity to focus on homicides.[8] Of the 10.5 million arrests every year, arrests for violent crimes account for only 5%, while arrests for low-level offenses account for 80%.[9] CILOA presents a solution to the excessive public safety resources spent on addressing offenses that are more appropriately dealt with through citations.

Here in Illinois, CILOA provisions took effect in September 2023.[10] The CILOA statute states, "[a] law enforcement officer shall issue a citation in lieu of custodial arrest, upon proper identification, for those accused of any offense that is not a felony or Class A misdemeanor."[11] Exceptions to the rule are if the officer "reasonably believes the accused poses a threat to the community or any person," if "a custodial arrest is necessary because the criminal activity persists after the issuance of a citation," or if "the accused has an obvious medical or mental health issue that poses a risk to the accused's own safety."[12] In other words, unless the detained individual lacks proper identification[13] or fits into one of the above categories, the officer must issue a citation for offenses below a Class A misdemeanor rather than carrying out an arrest and taking the person into custody. The law's release requirement is keyed to the severity of the alleged criminal offense. The philosophy behind CILOA is that minor crimes by definition do not amount to dangerous conduct that would require further law enforcement attention. Instead, this conduct can be addressed by issuing a citation and letting the person go, much like a traffic ticket.

Per the law, CILOA is required for Class B and C misdemeanors as well as petty and business offenses ("Sub-Class-A offenses"). All misdemeanors have a sentence of less than one year in custody, with descending severity starting with A to B to C.[14] Class B and C misdemeanors incur a sentence of six months and thirty days or less, respectively. Examples of such offenses include disorderly conduct and criminal trespass to real property.[15] Also subject to CILOA are petty or business offenses. Petty offenses largely include low-level traffic violations like failure to use a turn signal, and business offenses include charges like operating an uninsured motor vehicle.[16] The law does not impact officers' preexisting discretion under state law to cite and release individuals accused of Class A misdemeanors or felonies; it merely requires this process for Sub-Class-A offenses.[17]

When CILOA is applied, the person is released at the site of the encounter, i.e., "field released." Before field release the officer typically runs the person's name to check for warrants, and per their discretion and depending on the severity of the offense, the officer will either issue a ticket with a fine or a notice to appear in court at a later date on the charged

[7] *See* Jones & Sawyer, *supra* note 4.

[8] Maya Szilak, *Combating the Rise in Homicides by Expanding the Use of Citations in Lieu of Arrest*, R-Street, 1-2 (2022), https://www.rstreet.org/wp-content/uploads/2022/03/RSTREET251.pdf.

[9] *Id.* at 3.

[10] Various SAFE-T Act provisions were rolled out over time with the most controversial provision, dubbed the Pretrial Fairness Act and scheduled to be implemented in January of 2023, delayed due to legal opposition. Ultimately, the SAFE-T Act's pretrial reforms survived legal challenges and were implemented in September 2023. Matt Masterson, *Illinois Supreme Court Upholds SAFE-T Act Provision Eliminating Cash Bail*, WTTW (July 18, 2023), https://news.wttw.com/2023/07/18/illinois-supreme-court-upholds-safe-t-act-provision-eliminating-cash-bail.

[11] 725 ILCS 5/109-1(a-1).

[12] *Id.* at (i)-(iii).

[13] For further discussion on the issues with the "proper identification" exception to CILOA, *see* section CPD Policy Review: Misapplication of CILOA Exceptions, subsection 1. "[U]pon proper identification" below.

[14] 730 ILCS 5/5-4.5-85.

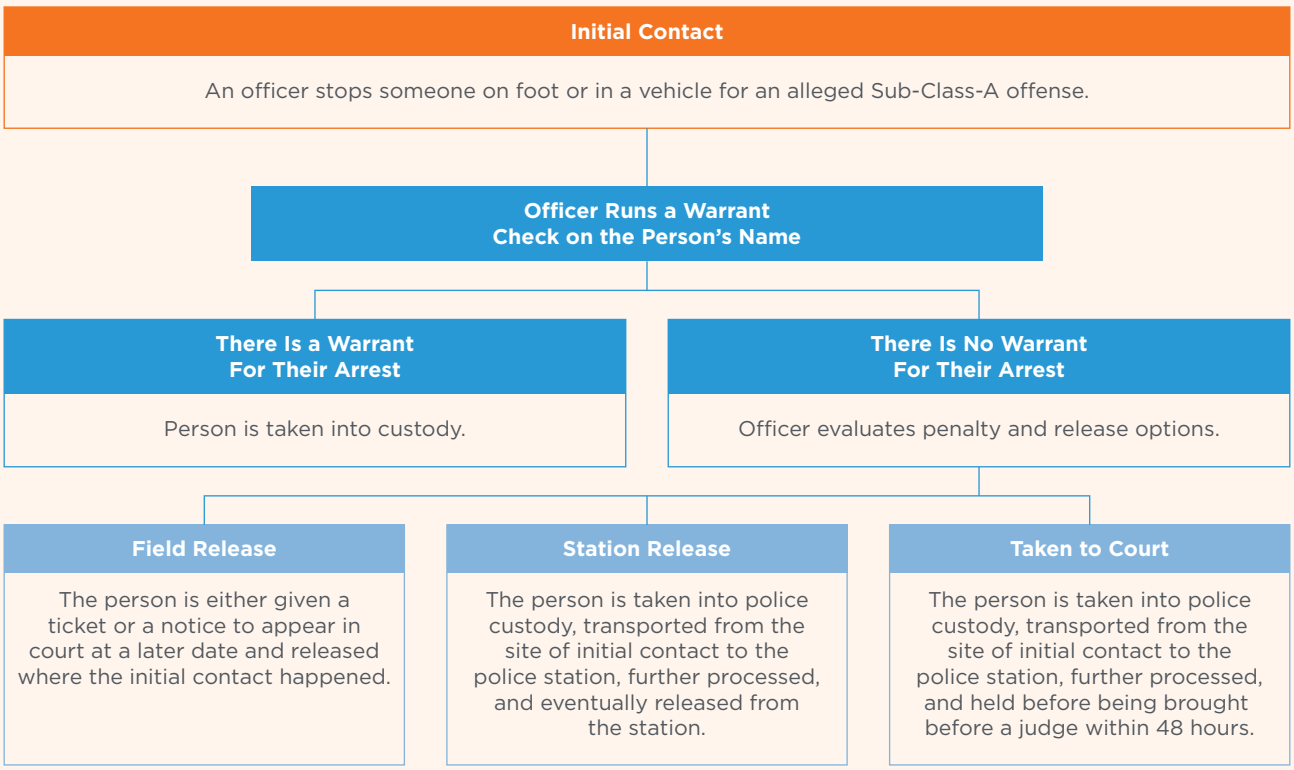
[15] 720 ILCS 5/26-1; 720 ILCS 5/21-3.

[16] 625 ILCS 5/12-208; 625 ILCS 5/3-707(c).

[17] 725 ILCS 5/109-1(a-1) ("Nothing in this Section requires arrest in the case of Class A misdemeanor and felony offenses or otherwise limits existing law enforcement discretion to decline to effect a custodial arrest.")

offense. Alternatively, if a person meets one of the exceptions to CILOA, an officer can bring them to the police station for further processing before releasing them, i.e., "station release." Bringing someone to the police station for processing, even if station released, can take several hours. If the charged offenses are non-detainable offenses, the SAFE-T Act requires a presumption of release by the officer without appearing before a judge.[18] However, if the person detained has been charged with a detainable offense, the officer must bring them before a judge within 48 hours to determine whether they shall be given conditional release or held in jail.[19] Compared to these more restrictive and time-consuming detentions, field release should last mere minutes, freeing up time and resources for the officer and the police department while liberating the person from further encroachment by the criminal legal system.

Figure 1: Citation In Lieu of Arrest Process



[18] 725 ILCS 5/109-1(a-3). *See* 725 ILCS 5/110-6.1 for a list of detainable offenses. Any offense not listed is a non-detainable offense. Examples of non-detainable offenses include most traffic violations or low-level theft.

[19] 5 ILCS 109-1.

Implementation Analysis

Illinois' enactment of the CILOA law presents an opportunity for the state to reap the benefits of increased diversion from police custody, but realizing that potential hinges on effective implementation. To evaluate that implementation, we analyzed local agency arrest and citation data, departmental policies, and officer training and guidance. Limitations in the available data and information restricted the scope of our analysis and the depth of our conclusions. While we sought to evaluate a sample of police agencies across the state, CPD provided the most comprehensive data, and therefore our analysis primarily focuses on this agency. Where informative, we spotlight examples from the other jurisdictions reviewed.

Ultimately, our analysis finds that CPD policy and arrest data raise concerns about how faithfully CPD is implementing the SAFE-T Act CILOA provisions. The available data shows that CPD release rates have decreased over time, and that type of charge, arrest location, and race may be impacting whether a person stopped for a CILOA eligible offense is field released. Further, as written, CPD policy construes the CILOA exceptions too broadly. This raises concerns that the "exceptions" to the law may not be the "exception" in Chicago. Arrest samples from other jurisdictions around Illinois indicate that a stricter adherence to CILOA is possible. Despite data limitations, paying close attention to these early indicators is critical at this juncture to prompt necessary course correction while implementation continues.

CPD policy and arrest data raise concerns about how faithfully CPD is implementing the SAFE-T Act CILOA provisions.

CILOA Data

Our review of CILOA implementation is based on publicly available sources and data and documents received in response to Freedom of Information Act (FOIA) requests to seven different police agencies, each chosen for their size and geographic diversity: Chicago Police Department, Cook County Sheriff's Office, Aurora Police Department, Peoria Police Department, Champaign Police Department, Rockford Police Department, and Bloomington Police Department.

The Chicago Police Department produced the most comprehensive data, while other jurisdictions provided smaller subsets of data or documents. For a more detailed explanation of the data collection process, the information we obtained, and obstacles we encountered along the way, please see Appendix A.

CPD Data Review: Trends Across Time, Charges, Location, and Race

The best source of data to analyze CPD's CILOA implementation is their arrest data. CPD policy requires officers to complete an arrest report for the types of incidents that would fall under the CILOA law.[20] However, certain traffic citations and municipal ordinance violations use a different citation system. CPD policy makes clear that those types of enforcement actions should continue as they existed before the SAFE-T Act.[21] Rather than an arrest report, some traffic offenses will result in only a Personal Service Citation (i.e., a traffic ticket), and some municipal ordinance violations will result in only an Administrative Notice of Violation (ANOV). Because CPD policy prescribes the arrest data as their way of collecting CILOA data and because those other datasets do not include information about whether the person was field released or brought into custody, arrest data is the dataset that our CPD analysis focuses on.[22] It does not include interactions that resulted in a Personal Service Citation or ANOV but no arrest report.[23]

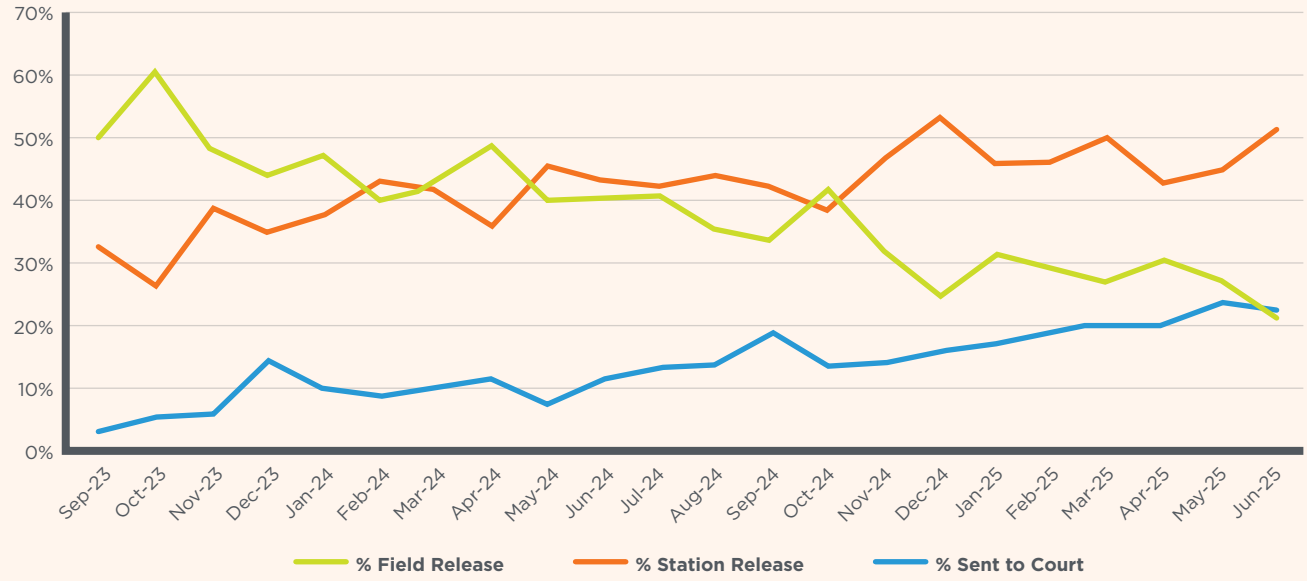
[20] Chicago Police Department, Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures (Eff. Nov. 15, 2023), https://directives.chicagopolice.org/#directive/public/6976?f=identification.

[21] *Id.* at Part VIII(C)("A CLEAR Automated Arrest Report will not be completed unless the arrestee is being considered for a felony upgrade or additional charges are identified (e.g., driver under the influence) and Part III(D) ("Department members will continue to follow the procedures established in the Department directive titled 'Municipal Administrative Hearings,' when an individual is eligible for enforcement via an Administrative Notice of Ordinance Violation (ANOV) citation for a violation of the Municipal Code of Chicago (MCC).").

[22] To obtain this data, we submitted a Freedom of Information Act Request to the Chicago Police Department asking for a list of every CPD arrest where the offenses did not include a felony or Class A misdemeanor, including the location of arrest, person's race, offenses at issue in the arrest, and whether the person was released in the field.

[23] For the time period reviewed here, CPD issued 61,612 Personal Service Citations. Due to the way CPD collects this data, we are unable to determine whether these individuals were issued the Personal Service Citation in the field and released or whether they were taken into custody, brought to the police district, and issued the Personal Service Citation there.

Figure 2: CPD CILOA-Eligible Arrests by Release Type
(September 2023 – June 2025)



Within the arrest data subset, however, we can pull out some key observations. Ultimately our analysis makes four primary conclusions:

1. CPD's Sub-Class-A field release rates have gone down since the implementation of the CILOA law.

According to CPD arrest data, the share of CILOA-required arrests that were field released has steadily decreased, from a high of 60% in October 2023 to 21.9% in June 2025, seen in Figure 2. That is lower than the percentage of these arrests who were sent to court, which in June 2025 was 22.9%.

Meanwhile, the share of those who were taken into custody and then released from the police station within this subset has steadily increased, from a low of 26.77% in October 2023 to a near high of 51.16% in June 2025.

Other jurisdictions, however, show higher release rates within the smaller sample of arrest reports we reviewed. For example, Cook County Sheriff's Office had an 82% field release rate, Aurora had an 84% field release rate, Peoria had a 73% field release rate, and Champaign had a 95% field release rate. CPD's field release rate averaged 38% throughout the September 2023 – June 2025 period, never reaching above 61% in any given month. Although the samples from these jurisdictions were narrower than CPD's data, their relatively high release rates indicate that greater adherence to the CILOA requirements is possible.[24] While differences in release rates may be expected to change over time, the clear decline of CILOA use across the first two years of CPD's implementation is concerning.

2. Despite all reviewed charges qualifying for field release, field release rates vary significantly depending on the offenses at issue.

The rate of field release varies significantly depending on the violations at issue. In the subset of Chicago arrest data, driving documentation offenses result in field release less often, with just 26% of people arrested for driving while unlicensed being field released compared to 66% being taken into custody and then released at the station.[25] These numbers

[24] The non-CPD police agencies did not collect and store arrest data in a way that would allow the agency to readily produce a list of arrests restricted to Sub-Class-A offenses with descriptors of release type for the full review period. To address those challenges, we requested either a list of arrests or individual arrest reports from three sample weeks throughout the implementation period. Therefore, the release rates for these other jurisdictions are calculated from only the three sample weeks. For more details on these data limitations, *see* Appendix A.

[25] For individuals arrested while driving who are station released or arrested pending a detention hearing, their vehicles are either left at the scene or they are towed and/or impounded per Chicago Municipal Code 9-92-30(h-i) and CPD's General Order G07-03 detailing the towing and impoundment procedure.

Driving documentation offenses result in field release less often, with just 26% of people arrested for driving while unlicensed being field released.

decrease further to 4% and 3% field release rates when the offense is "operating an uninsured vehicle" and "failure to carry driver's license," respectively. As discussed below, CPD policy virtually carves out these types of offenses as disqualifying an individual for CILOA.

Similarly, although Cook County's sample arrest data had a high field release rate overall, the majority of the 8.90% of reviewed arrests who were station released were accused of driving documentation related offenses. These offenses include "driving without a valid driver's license," "lack of insurance," and "lack or improper use of registration."

There is a clear relationship between documentation related offenses and the officer's decision to not conduct a field release. While further explored elsewhere in the paper, it appears to be due to the officer's reliance on the condition of "proper identification" and the exception regarding the risk that the detained individual will persist in the criminal activity.

Compare this with CPD's Chicago Transit Authority (CTA) related arrests, which have much higher field release rates. For example, 96% of those accused of "trespassing on the CTA without paying" and 84% accused of "using alcohol or drugs on CTA" were cited and released in the field. Possible explanations for this could include that police officers are likely on foot and thus inclined to give a ticket or notice to appear in court rather than find a mode of transport to the station. These are also municipal offenses, which officers may be more inclined to grant field release for than misdemeanors. Further, unlike driving documentation offenses, the police may be less likely to care about insufficient documentation for a CTA offense stop, because carrying identification is not required to ride the CTA.

Among those who are taken to court, the most common charges are a forcible (or perceived to be a forcible) offense like "simple assault" or "gun offender registration" violations. "Trespass" is also common in these release types, although it is also common in field release and station release arrests.

Some relationship between charge type and release type might be expected, because charge type corresponds to the severity of conduct, which could correspond to CILOA exceptions for, e.g., safety threats. However, the data raises the question of whether CPD is using the charge alone to deny field release, rather than evaluating each individual instance for whether the conduct triggers a CILOA exception that would justify denying field release. The high rate of denying field release for some offenses, particularly driving documentation offenses, raises concerns about whether CPD is applying a bright-line rule when they should instead be making these individual assessments. In truth, all Sub-Class-A misdemeanor driving offenses qualify for field release, unless an exception applies. While all arrests reviewed had charges that would trigger the CILOA requirement, not all arrested persons were treated equally, seemingly depending in part on what specific charges were at issue, even though the SAFE-T Act requirement applies to all arrests we reviewed.

3. Field release rates differ significantly across police districts.

Within the Sub-Class-A arrest data, we also see significant variance in field release rates across Chicago's twenty-two police districts. As shown in Figure 3, the three districts with the most arrests have by far the highest field release rates. Districts 1, 18, and 10 have field release rates of 53.13%, 68.56%, and 58.90% respectively. District 1 and District 18 cover Chicago's largest commercial and recreational area, ranging from the Gold Coast down to the South Loop, which could potentially explain the high number of arrests. District 10, however, is ranked third, and it does not have the same rate of commercial activity, covering areas like Douglas Park, Little Village, and North Lawndale. While District 10 doesn't have the

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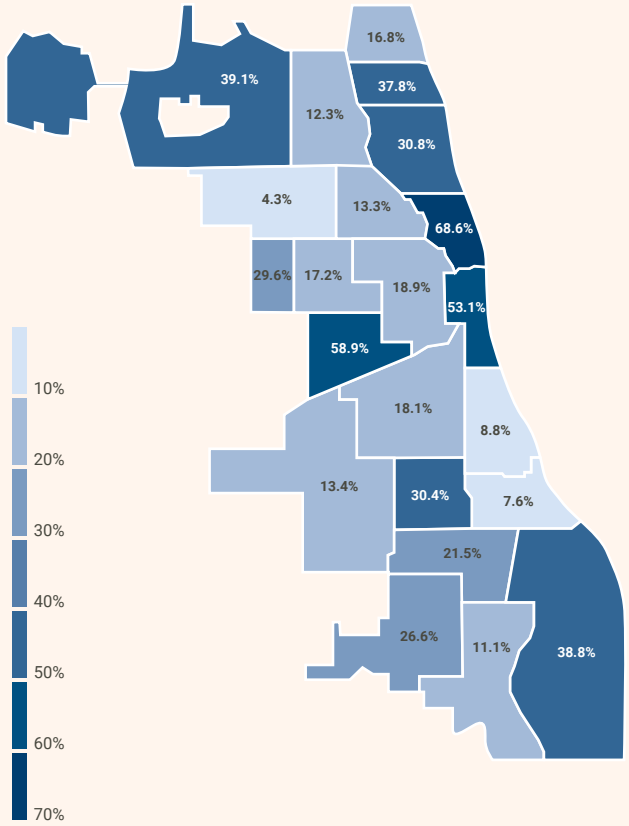
Figure 3: Sub-Class-A Arrests by Chicago Police District
(September 2023 – June 2025)

Rank in # of Arrests	Police District	% of Chicago Arrests	% Field Released
1	01	26.81%	53.13%
2	18	11.12%	68.56%
3	10	10.41%	58.90%
4	25	4.68%	4.32%
5	11	4.55%	17.22%
6	09	3.71%	18.14%
7	12	3.65%	18.94%
8	03	3.57%	7.55%
9	06	3.34%	21.46%
10	08	3.27%	13.40%
11	04	3.00%	38.76%
12	19	2.87%	30.79%
13	16	2.71%	39.13%
14	07	2.47%	30.38%
15	05	2.36%	11.07%
16	24	2.00%	16.81%
17	20	1.83%	37.79%
18	15	1.65%	29.59%
19	02	1.63%	8.81%
20	14	1.52%	13.33%
21	17	1.51%	12.29%
22	22	1.20%	26.57%

Figure 4: Map of Sub-Class-A Arrest Field Release Rates by Chicago Police District
(September 2023 – June 2025)



same commercial activity as Districts 1 and 18, it does have a population consisting of mostly Black and Latiné[26] residents.[27]

While these districts have high rates of Sub-Class-A arrests paired with higher rates of field releases, the trend doesn't hold across all districts. For example, District 25 on Chicago's West Side has the lowest rate of field release citywide at 4.32% despite having the fourth highest number of Sub-Class-A arrests citywide. Overall, many districts have very low field release rates. As the map in Figure 4 shows, sixteen districts (73%) field release less than a third of these Sub-Class-A arrests.

Once we consider the charges in question, we find that the districts with the highest numbers of Sub-Class-A arrests have dissimilar top arrest offenses. In District 1, home to the epicenter of CTA bus and L' routes, the top offense is "riding the CTA without

[26] Latiné is a gender-neutral form of the term Latino referring to individuals who trace their roots to Latin America. It is often preferred by Latiné people over Latinx (which fits less easily into Spanish speech), Latino (which is not gender neutral), or Hispanic (which refers to the broad group of Spanish-speaking people, including from Spain). Here the accent mark, specifically the acute accent, over the /e/ is an orthographic attempt to ensure pronunciation of the /e/ in Latiné for English language readers. CPD arrest data uses the terms "White Hispanic" and "Black Hispanic" to describe a person's race, delineating by both race (White or Black) and Hispanic ethnicity. When directly quoting CPD data in text or visualizations we use CPD's terminology. We also group Black and Black Hispanic individuals together when depicting racial categories. However, when speaking about the data in our own words, we choose to use Latiné over Hispanic not only because it is the terminology that many in this group choose to use themselves, but also it is a more accurate description of the way individuals from Latin America have been racialized in the United States.

[27] North Lawndale, which includes Douglas Park, has a Black population of 76.2%. *See* Chicago Metropolitan Agency for Planning, *North Lawndale: Community Data Snapshot*, 3,6 (July 2025), https://www.cmap.illinois.gov/wp-content/uploads/dlm_uploads/North-Lawndale.pdf. Little Village, also known as South Lawndale, has an Hispanic or Latino population of 81%. *See* Chicago Metropolitan Agency for Planning, *South Lawndale: Community Data Snapshot*, 3 (July 2025), https://www.cmap.illinois.gov/wp-content/uploads/dlm_uploads/South-Lawndale.pdf.

Across Chicago's police districts we see a significant variance in field release rates, meaning that a person stopped in one neighborhood for a crime may be subjected to different treatment than if they were stopped in another neighborhood for the same offense.

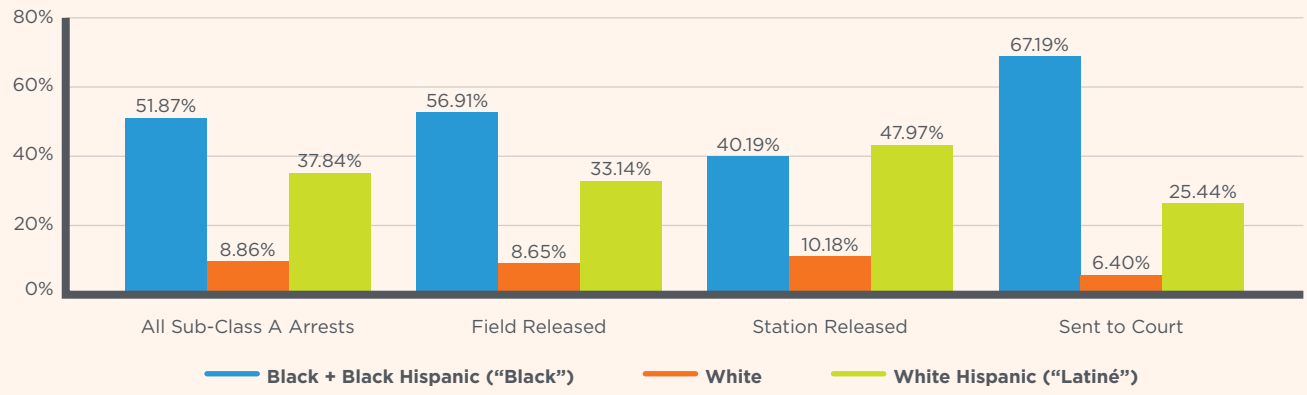
paying." In District 18, the top offense is "driving without issuing a license," suggesting traffic stops as being a top source of their arrests. Finally, District 10's top charge by a large margin is "drinking alcohol on the public way."

Overall, across Chicago's police districts we see a significant variance in field release rates, meaning that a person stopped in one neighborhood for a crime may be subjected to different treatment than if they were stopped in another neighborhood for the same offense. Moreover, districts with the highest numbers of arrests may be utilizing the time-saving rewards of using CILOA more often than other police districts with fewer arrests as evidenced by their higher field release rates. Overall, it shows there needs to be greater consistency in application of CILOA across the city.

4. The data suggests that how a person is released may be connected to their race.

CPD data suggests a relationship between the race of the individual charged, what they are charged with, and the release type. The racial breakdown of the Sub-Class-A arrest data shows that Black and Latiné people are disproportionately arrested for Sub-Class-A crimes compared to their makeup of the surrounding population.[28] However, even within this subset of data, we see people of different races being granted field release differently. As shown in Figure 5, compared to their share of Sub-Class-A arrested persons, Black individuals are slightly overrepresented among those who are field released. On the other hand, they are then underrepresented among those who are station released and significantly overrepresented in those who are sent to court. For arrested Latiné people, they are slightly underrepresented in the field-released population but overrepresented in those who are station released and underrepresented in those sent to court. White people make up a small percentage of the Sub-Class-A arrested people, but their share of the three release types is roughly proportional. Generally, it appears that arrested Black and Latiné people are treated differently by officers when discerning between a field release versus station release.

Figure 5: Sub-Class-A Arrests by Race and Release Type
(September 2023 – June 2025)



[28] Over-policing in low-income, minority-majority neighborhoods is longstanding and persistent. Despite not making communities safer, Black and Latiné people are disproportionately targeted for pretextual traffic stops and stop and frisk tactics that can result in arrests for minor crimes. *See, e.g.*, ACLU of Illinois, *Stop and Frisk in Chicago* (March 2015), https://www.aclu-il.org/app/uploads/2017/07/ACLU_StopandFrisk_6.pdf; Loren Jones & Amy Thompson, *A New Vehicle for Stop and Frisk: The Scope, Impact, and Inequities of Traffic Stops in Chicago*, Impact For Equity (Mar. 2023), https://impactforequity.org/report/a-new-vehicle-for-stop-and-frisk-the-scope-impact-and-inequities-of-traffic-stops-in-chicago/; Chip Mitchell, *Chicago police traffic stops plunge, but racial disparities persist, analysis finds,* WBEZ Chicago (July 16, 2025), https://www.wbez.org/data/2025/07/16/report-shows-big-drop-in-chicago-police-traffic-stops-but-sharp-racial-disparities-persist.

This difference may be related to the types of offenses for which CPD most commonly arrests different racial groups and the field release rates of those offenses. As Figure 6 shows, the top charge for Black people arrested is "trespass on CTA without paying." This offense has a 96% release rate, which may explain why Black people are overrepresented in the field release population.

For Latiné people arrested, the top charges include "driving/never issued license" at 47.53%, "operating an uninsured motor vehicle" at 29.16%, and "no valid registration" at 10.31%. This likely explains why, compared to all other race groups, they are most underrepresented among those field-released (33.14%) compared to their percentage of the arrested population (37.84%). Chicago has a large immigrant population that has increased with the recent wave of asylum seekers, many of whom are struggling to find stable housing.[29] Immigrants and houseless individuals often have difficulty identifying, acquiring, and keeping legally necessary documentation, which may result in them being charged more often with documentation-related offenses.[30]

Cook County Sheriff's Office arrest data showed similar trends with Latiné arrested people. Although Cook County did not provide race data in its arrest reports, factors such as the person's name, requests for translators, and foreign identification give clues to the person's ethnicity. Eight of the nine persons who were taken into custody in Cook County for a CILOA offense had a Spanish-language name or had identified the need for a translator in the arrest narrative, suggesting those who are not field released by Cook County Sheriff are largely Latiné and Hispanic.

Overall, likely due to a variety of factors including the charge type, CPD's arrest data shows that persons of different races in Chicago are experiencing CPD's release decisions differently.

Figure 6: Most Common Sub-Class-A Arrest Charges by Race
(September 2023 – June 2025)

Black and Black Hispanic ("Black") Top Charges	# of Arrests	% of Black Sub-Class-A Arrests
Trespass on CTA without paying	1,299	21.10%
Assault — simple	1,036	16.83%
Criminal trespass to land	692	11.24%
Annual gun offender registration	584	9.49%
Drinking alcohol on the public way	509	8.27%
White Hispanic ("Latiné") Top Charges	**# of Arrests**	**% of White Hispanic Sub-Class-A Arrests**
Driving/never issued license	2,135	47.53%
Operate uninsured motor vehicle	1,310	29.16%
Drinking alcohol on the public way	541	12.04%
No valid registration	463	10.31%
Assault — simple	366	8.15%
White Top Charges	**# of Arrests**	**% of White Sub-Class-A Arrests**
Criminal trespass to land	217	20.63%
Assault — simple	149	14.16%
Trespass on CTA without paying	129	12.26%
Criminal trespass to real property	121	11.50%
Criminal trespass — remain on land	112	10.65%

[29] As of December 2024, Chicago had recorded 51,648 new arrivals from the Southern border. City of Chicago, New Arrivals Situational Awareness Dashboard (last accessed: Jan. 28, 2026), https://www.chicago.gov/city/en/sites/texas-new-arrivals/home/Dashboard.html. As of January 2025, the houseless population tripled, and among their numbers are the increased wave of immigrants. Cindy Hernandez & Violet Miller, *Chicago Sun-Times: Chicago's homelessness surged in 2024, as major U.S. cities bore the brunt of a national trend*, Chicago Coalition to End Homelessness (Jan. 4, 2025), https://chicagohomeless.org/chicago-sun-times-chicagos-homelessness-surged-in-2024-as-major-u-s-cities-bore-the-brunt-of-a-national-trend/.

[30] US Government Accountability Office, Report to Congressional Committees, Homelessness: Barriers to Obtaining Id And Assistance Provided to Help Gain Access 8-11 (2024), https://www.gao.gov/assets/d24105435.pdf; Devin Haas, *What Real ID Will Mean For Undocumented Chicagoans*, South Side Weekly (Nov. 2, 2022), https://southsideweekly.com/what-real-id-will-mean-for-undocumented-chicagoans/.

CPD Policy Review: Misapplication of CILOA Exceptions

Arrest data raises concerns about why field release rates are lower than expected. Part of the explanation for this discrepancy may include CPD's overly broad interpretation of the CILOA exceptions. While the SAFE-T Act required law enforcement to issue a citation instead of bringing a person into custody for certain low-level crimes, it also established exceptions to that general requirement. As stated above, officers are permitted to take a person into custody even when only minor crimes are at issue if: (1) the accused person lacks proper identification; (2) the officer has a reasonable belief that the person poses a threat to the community or a person; (3) the criminal activity continues after the accused person is issued a citation; or (4) the accused person has an obvious medical or mental health issue that poses a risk to their own safety.[31]

The statutory exceptions provided some guidance to departments, but departments must more fully flesh out the meaning behind these exceptions in order to implement the law and to give further instruction to officers.[32] There has been no statewide guidance on that implementation, and unfortunately, agencies like CPD demonstrate how these exceptions can be interpreted contrary to both the text and the intent of the law.

1. "[U]pon proper identification"

In order for the CILOA requirement to apply, a person must first have provided "proper identification."[33] State law does not elaborate on what would constitute proper identification in these circumstances, leaving significant leeway for departments to define this exception.

Law enforcement has several incentives to establish the identity of a person being cited, including being able to link the citation to a person's prior or future police encounters and ensuring that there is a pathway to tracking a person down if they fail to comply with the citation's requirements. For example, in one Cook County Sheriff's Office arrest, officers made a traffic stop for a petty traffic offense. When the individual could not produce any identification at all, officers took him into custody and fingerprinted him, which led to his being connected to a prior offense.[34]

There has been no statewide guidance on that implementation, and unfortunately, agencies like CPD demonstrate how these exceptions can be interpreted contrary to both the text and the intent of the law.

However, arrest records from multiple departments show that oftentimes the "proper identification" exception is applied to people even when they can produce valid identification from another country. Excluding foreign identification results in prolonged police contact for immigrant residents and visitors. It also contradicts the state's public policy aim to serve as a sanctuary for immigrants.[35]

Here in Chicago, samples of Sub-Class-A arrest records showed individuals who produced identification from Venezuela, Ecuador, or other countries, were taken into custody because officers stated that "is not a valid form of ID."[36] However, CPD policy states that a person can be properly identified if they provide government identification.[37] Moreover, CPD policy, as directed by local ordinance, states that where presentation of an Illinois identification card would be accepted as adequate evidence of identity, presentation of a photo ID from a person's nation of origin should be acceptable and "will not subject the person to a higher level of scrutiny or different

[31] 725 ILCS 5/109-1(a-1).

[32] The Illinois Pretrial Implementation Task Force named this interpretation as further work that departments would need to do. Illinois Pretrial Implementation Task Force, Pretrial Fairness Act Release by Citation Flowchart and Implementation Considerations (2022), https://ilcourtsaudio.blob.core.windows.net/antilles-resources/resources/b3d911ef-bd4e-4263-b86b-0b16fe032ac9/Pretrial%20Fairness%20Act%20Release%20by%20Citation%20Flowchart%20and%20Implementation%20Considerations.pdf.

[33] 725 ILCS 5/109-1(a-1) ("Law enforcement shall issue a citation in lieu of custodial arrest, upon proper identification, for those accused of any offense that is not a felony or Class A misdemeanor…").

[34] Sample of Cook County Sheriff's Office arrest record, on file with Impact for Equity.

[35] *See* Illinois TRUST Act, 5 ILCS 805/ et seq.

[36] Samples of Chicago Police Department arrest records, on file with Impact for Equity.

[37] Chicago Police Department, Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures (Eff. Nov. 15, 2023), https://directives.chicagopolice.org/#directive/public/6976?f=identification.

Where presentation of an Illinois identification card would be accepted as adequate evidence of identity, presentation of a photo ID from a person's nation of origin should be acceptable and "will not subject the person to a higher level of scrutiny..."

treatment than if the person had provided an Illinois driver's license or identification card."[38]

Thus, CPD's unclear definition of what ultimately constitutes proper identification appears to subject some immigrants who are arrested to increased unwarranted scrutiny.

2. "[T]he accused poses a threat to the community or any person"

Where a person normally should be released in the field under CILOA, they can be taken into custody if "a law enforcement officer reasonably believes the accused poses a threat to the community or any person."[39] For example, a person being arrested by Bloomington Police Department officers for the Sub-Class-A misdemeanor Disorderly Conduct allegedly threatened physical violence toward officers and their family members and was therefore taken into custody.[40]

With no further elaboration from the state on what circumstances constitute a threat, agencies are left to interpret on their own. CPD policy and training have construed the scope of a possible threat unjustifiably broadly. CPD policy states that the determination of a threat will be based on the totality of circumstances but specifies that those circumstances can include a person's criminal history, including misdemeanor convictions that are up to ten years old or felony convictions that are up to twenty years old.[41] These unspecific and remote factors risk subjecting a person to police custody solely based on past actions rather than the presence of a legitimate and immediate threat that would require custody. A prerequisite for the CILOA requirement is that the criminal allegations at issue are lower-level offenses less than a Class A misdemeanor. If more serious conduct is at issue, officers can allege more serious crimes, and the CILOA requirement would no longer apply. However, without such evidence, officers should not be permitted to use a person's distant criminal history to deny them the field release they are entitled to under the SAFE-T Act.

3. "[C]riminal activity persists after the issuance of a citation"

The third exception to the citation in lieu of custodial arrest requirement is if "a custodial arrest is necessary because the criminal activity persists after the issuance of a citation."[42] Several smaller department arrest reports clearly show officers applying this exception per the statute's terms. For example, in several arrests reviewed from the Aurora Police Department an individual was cited for criminal trespass, ordered to leave, and instructed that if they returned they would be taken into custody. Generally, the person did not return. However, in one arrest when the person did return, the officers then took them into custody.[43] These arrests show that when implemented properly, individuals need not be taken into custody, but that if necessary, they can be based on their actions after citation.

The statute's description of this exception makes clear that custodial arrest can only be made where a person's activity persists after citation. However, CPD policy contravenes that language and instead allows officers to determine whether "based on credible, articulated evidence, there is high probability the arrestee will continue, return, or restart the offense(s)

Officers should not be permitted to use a person's distant criminal history to deny them the field release they are entitled to under the SAFE-T Act.

[38] Chicago Police Department, Special Order S06-14-03: Responding to Incidents Involving Citizenship Status, https://directives.chicagopolice.org/#directive/public/6495?f=Responding%20to%20Incidents%20Involving%20Citizenship%20Status; City of Chicago Welcoming City Ordinance, Chi. Mun. Code § 2-173-040(b).

[39] 725 ILCS 5/109-1(a-1).

[40] Sample of Bloomington Police Department arrest record, on file with Impact for Equity.

[41] Chicago Police Department, Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures (Eff. Nov. 15, 2023), https://directives.chicagopolice.org/#directive/public/6976?f=identification.

[42] 725 ILCS 5/109-1(a-1).

[43] Sample of Aurora Police Department arrest records, on file with Impact for Equity.

after the member leaves the scene[.]"[44] It does not first require officers to issue a citation and then observe continued criminal activity. By allowing officers to estimate whether someone's criminal activity will persist, CPD's policy runs counter to the language and undermines the purpose of the CILOA reform. It relies on officers' estimation of propensity to engage in criminal activity. The policy even goes so far as to describe specific offenses that are de facto presumed likely to be continued by stating, "...other lesser traffic offenses where there is high probability the arrestee will continue or restart the offense(s) after the member leaves the scene (e.g., Driving when Never Issued a License, Driving with No License or Permit) will be processed in the district facility in the district of occurrence...."[45] This strict policy prescription assumes without evidence that individuals will choose to continue breaking the law and denies individuals the chance at field release that the CILOA law requires.

4. "[A]n obvious medical or mental health issue that poses a risk to the accused's own safety"

Finally, the last exception to the CILOA requirement is where "the accused has an obvious medical or mental health issue that poses a risk to the accused's own safety."[46] For example, the Rockford Police Department arrested an individual for trespass after he was acting erratically and scaring customers in a store. The officers noted that the individual would be transferred to jail "for Criminal Trespass as he poses a danger to himself or others based on his mental health status."[47] While taking a person into custody is not an effective solution to mental health crises,[48] this appears to be an application of the CILOA exception that aligns with the statute.

This strict policy prescription assumes without evidence that individuals will choose to continue breaking the law and denies individuals the chance at field release that the CILOA law requires.

This would allow a person to be taken into custody for a minor offense simply because they have a medical or a mental health issue, regardless of whether that condition is jeopardizing their safety.

However, CPD's policy breaks this exception into two, making it easier for the CILOA exception to apply. CPD policy states a person is ineligible for field release with a citation if the person "has medical or mental health issues" or "is determined by a Department member, based on the totality of the circumstances, to pose a threat to their own safety."[49] This would allow a person to be taken into custody for a minor offense simply because they have a medical or a mental health issue, regardless of whether that condition is jeopardizing their safety. This is another example of CPD policy contravening the language of the CILOA law and opening up more opportunities for people to be unnecessarily taken into police custody.

The CILOA law is an important change that allows for reduced law enforcement contact. However, a critical element of reform is effective implementation. CPD data, policy, and sample arrest reports raise serious concerns about whether CPD's implementation complies with the letter of state law and runs counter to the intent of this reform.

[44] Chicago Police Department, Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures (Eff. Nov. 15, 2023), https://directives.chicagopolice.org/#directive/public/6976?f=identification.

[45] *Id.*

[46] 725 ILCS 5/109-1(a-1).

[47] Sample of Rockford Police Department arrest record, on file with Impact for Equity.

[48] It is well established that criminalizing mental health crises by bringing individuals into custody and charging them with crimes instead of providing them with care exacerbates the individual's mental health condition, causes trauma, results in overcrowding of jails and prisons, and prevents them from getting the treatment and resources they need. *See, e.g.*, Sam McMann, *Locking up People with Mental Health Conditions Doesn't Make Anyone Safer*, Vera Institute for Justice (Aug. 25, 2022), https://www.vera.org/news/locking-up-people-with-mental-health-conditions-doesnt-make-anyone-safer; National Alliance on Mental Illnois, *Criminalization Of People With Mental Illness* (last accessed Dec. 15, 2025), https://www.nami.org/advocacy/policy-priorities/stopping-harmful-practices/criminalization-of-people-with-mental-illness/; Bazelon Center for Mental Health Law, *Diversion to What? Evidence-Based Mental Health Services that Prevent Needless Incarceration* (Sept. 2019), https://www.bazelon.org/wp-content/uploads/2019/09/Bazelon-Diversion-to-What-Essential-Services-Publication_September-2019.pdf.

[49] Chicago Police Department, Special Order S06-01-13: Pretrial Fairness Act Arrest Processing Procedures (Eff. Nov. 15, 2023), https://directives.chicagopolice.org/#directive/public/6976?f=identification.

Recommendations

To increase field release rates under the SAFE-T Act's CILOA provisions in Chicago and around Illinois, there are several steps local departments and state officials should take:

1. The Chicago Police Department must correct the deficiencies in its policies governing CILOA implementation.

The review of CPD policy on CILOA revealed the need for changes to department policy to correct misapplications of the law, clarify standards, and provide further guidance for law enforcement. Specifically, CPD must at a minimum:

a. Make clear what types of identification are sufficient to satisfy "proper identification" in accordance with Chicago's Welcoming City Ordinance and related policies;

b. Eliminate the unnecessarily broad inclusion of criminal records in determining whether there is a threat to the community or a person, requiring taking the person into custody. If criminal records are considered, they must be directly related and close in time to the offense at issue;

c. Correct the policy provision that improperly allows officers to take someone into custody based on the likelihood of future continued criminal behavior rather than observed criminal conduct after citation, as the law requires; and

d. Rectify the policy provision that lowers the bar for applying the CILOA exception for medical or mental health conditions. The policy must require both that (1) the person has a physical or mental health condition and (2) the condition poses a risk to the person's own safety, per the statute's terms.

2. Law enforcement agencies must examine their local policies to ensure they are fully and accurately implementing the CILOA reform.

Departmental policies, officer guidance, and training are how local departments operationalize laws that regulate officer decision making. CPD's policy that misinterprets the CILOA exceptions is a cautionary tale of how an overly broad policy risks the exceptions having an outsized role in the administration of the law. Other local departments should examine their own policies to ensure officers are given accurate and effective guidance that strives for increased diversion in alignment with the CILOA law's aims. Departments should also make sure they are collecting and analyzing the citation and arrest data necessary to make those assessments.

3. Illinois should develop a model policy for CILOA implementation.

To help local departments properly implement CILOA, Illinois should develop a model policy that will address the correct scope of the law by adding further detail to the CILOA exceptions. The model policy must narrowly delineate when the CILOA exceptions can be applied to ensure the law's ultimate goal of increased diversion is achieved. The model policy also needs to include recommended data collection practices to enable departments to collect enough data on each police interaction so they and the public can isolate arrests by offense class, track field release rates in the aggregate, and readily understand the reasons for and against field release. Leveraging that improved data collection, the model policy should also recommend evaluation processes to help local law enforcement and the public determine whether and to what degree the CILOA law is being implemented.

State agencies with expertise should develop this model policy. The Illinois Criminal Justice Information Authority (ICJIA) has subject matter expertise regarding deflection models that could inform the

obstacles for diversionary policy implementation and propose procedures to help effectuate service referrals, avoiding unnecessary detention.[50] Further, ICJIA has law enforcement data collection and analysis expertise that would enable them to recommend data practices that would ultimately aid in analysis and evaluation. The Illinois Law Enforcement Training and Standards Board (ILETSB) has relevant knowledge of law enforcement operations and procedures. Working together, ICJIA and ILETSB could develop a model policy that would address the implementation gaps and suit the needs and procedures of departments.

4. Statewide law enforcement oversight agencies like ILETSB should educate law enforcement about the benefits—to both people who are arrested and law enforcement—of CILOA.

CILOA is a promising reform that can help limit unnecessary contact between civilians and law enforcement. Further, it has the potential to reduce the consumption of public safety resources and officer hours. Some law enforcement officials in Illinois have expressed their support for reforms like this, citing the benefits of saved law enforcement time and resources spent transporting, fingerprinting, and processing people unnecessarily.[51] ILETSB and other state law enforcement agencies can help make the case for why this reform is beneficial both for people who are arrested and the departments. The state can help increase compliance with this law with peer messengers by showing local agencies the operational and financial benefits of proper implementation.

5. Illinois should consider ways to evaluate law enforcement agencies' compliance with the CILOA requirements and respond to noncompliance.

This report reviews the available information regarding compliance with Illinois' new CILOA law. However, limitations in the available data make it difficult to comprehensively assess whether even departments with relatively robust data collection comply with the law. The increased data collection from Recommendations #2 and #3 would help facilitate greater oversight by state agencies. That oversight must also include a response mechanism so the state can appropriately address agencies not in compliance with the law.

Options for Illinois to address noncompliance could include the Office of the Attorney General initiating an action for mandamus or injunction or state agencies deeming noncompliant local agencies ineligible for state grants.

6. Illinois legislators should consider whether the current exceptions to the CILOA law are serving the ultimate aims of diversion from custody and make legislative amendments to address any gaps.

As implementation continues and more information emerges about the impact of CILOA, legislators should monitor whether the objective of the law—increased diversion from law enforcement custody—is being achieved. As gaps surface, legislators must stand ready to advance any necessary amendments to

[50] *See, e.g.*, Alex Menninger et. al, *The Evaluation of the Illinois Multi-Site Police-Initiated Deflection Initiative*, Ill. Criminal Justice Information Authority (July 21, 2025), https://icjia.illinois.gov/researchhub/articles/the-evaluation-of-the-illinois-multi-site-police-initiated-deflection-initiative/; Melissa Labriola, et. al, *A Multi-Site Evaluation of Law Enforcement Deflection in the United States*, RAND Corporation & The Illinois Criminal Justice Information Authority (Feb. 21, 2023), https://icjia.illinois.gov/researchhub/articles/a-multi-site-evaluation-of-law-enforcement-deflection-in-the-united-states/.

[51] Matt Alsdorf, *Illinois Law Enforcement Leaders Discuss the Pretrial Fairness Act*, Advancing Pretrial Policy & Research (Oct. 30, 2024), https://advancingpretrial.org/story/illinois-law-enforcement-leaders-discuss-the-pretrial-fairness-act/ (quoting Chief Jamal Simington, Bloomington Police Department: "You can respond to a situation and resolve a situation with fewer personnel hours for those miscellaneous offenses, like retail thefts and criminal trespass. You can cite and release and then move on. This saves officers time because you're not booking people into jail.")

make sure individuals are being cited in lieu of arrest in all possible circumstances and that the current language is not unnecessarily limiting the law's potential impact.

For instance, the law allows officers to bring a person into custody who would otherwise be entitled to CILOA if "the accused has an obvious medical or mental health issue that poses a risk to the accused's own safety."[52] Instead, the law should require officers to connect the individual to necessary care that would address the medical or mental health issue rather than taking them to a law enforcement facility where they will not have access to that needed care. Rather than providing people in crisis access to care and the same diversionary opportunities others enjoy, officers are taking them into custody. Officers increase the risk of escalating and exacerbating the problem by subjecting a person experiencing a mental or medical health crisis to a custodial arrest. This risk could be remedied with this legislative change.

[52] 725 ILCS 5/109-1(a-1).

Conclusion

The SAFE-T Act's CILOA reform opened a door for Illinois to reduce harmful criminal legal system interactions and limit the drain on public safety resources stemming from unnecessary custodial detention. It mandated grace for those minor violators who otherwise would have been subjected to the harmful and lasting impact of custodial arrest. Yet this report's analysis raises concerns that Illinois' largest police agency, the Chicago Police Department, may be falling short in fully and equitably implementing CILOA.

To address these gaps in implementation, this report offers recommendations for local and state law enforcement and oversight agencies. The six recommendations seek to correct the deficiencies in law enforcement directives, encourage local data collection and policy review, advocate for the drafting of model policies, promote further education of local law enforcement, encourage oversight to address noncompliance, and suggest further inquiry into potential statutory amendments that would further align the impact of the law with its original intent.

Illinois took an important step toward reducing the harms of the criminal legal system by enacting the SAFE-T Act's CILOA reforms. Spotlighting early indicators of implementation failures like those discussed in this report can help jurisdictions across Illinois identify and address actual or possible gaps in their own systems. By committing to the above recommendations, we as a state can improve compliance with the law and reduce the negative impacts from unnecessary and often detrimental interactions with the criminal legal system.

Appendix A: Data Collection and Methods

For the seven police departments reviewed, we requested data on all Sub-Class-A arrests, including whether the individual was field released and why or why not. None of the reviewed departments systematically collected data on the reasons for providing or denying field release by citation. The information that was available was in each individual arrest record, making it virtually impossible to analyze reasonings for providing or denying field release by citation in the aggregate. This made it difficult to get a comprehensive picture of why individuals were or were not being cited in lieu of custodial arrest. Further, some departments recorded arrest data in a manner that impeded our ability to restrict the analysis to the arrest types requiring CILOA. For these departments, we focused on "sample" weeks selected throughout the implementation time frame. Finally, for smaller departments, the FOIA response unit's capacity limited the amount of documents and data provided.

Despite the data limitations, this report analyzes the available data and documents to assess successes or concerns with CILOA implementation in Illinois. We reviewed the following data and documents from each police agency:

a. Chicago Police Department: A list of all arrests with a corresponding arrest record that did not include a felony or Class A misdemeanor from January 2023 – June 2025 (data included the arrested person's race, arrest location, charges involved, and whether the person was released in the field, released at the police district, or taken to court); forty-nine individual arrest reports throughout January 2023 – June 2025 with charges that did not include a felony or Class A misdemeanor (which each included the officer's narrative describing the arrest and reason for release or custodial arrest); all Personal Service Citation records January 2023 – June 2025; relevant CPD policy directives; CPD training materials related to CILOA implementation.

b. Cook County Sheriff's Office: A list of every arrest that did not include a felony or Class A misdemeanor during the sample weeks of September 18-24, 2023, September 18-24, 2024, and March 18-24, 2025 (data included arrest location, charges involved, and arrest narrative which generally included information about whether the person was released with a citation in the field); Cook County Sheriff's Office departmental policy.

c. Aurora Police Department, Bloomington Police Department, Champaign Police Department, Rockford Police Department, and Peoria Police Department: All individual arrest reports during the sample weeks of September 18-24, 2023, September 18-24, 2024, and March 18-24, 2025 (data included arrest location, charges involved, and arrest narrative which often included information about whether the person was released with a citation in the field); Aurora, Bloomington, Champaign, Peoria, and Rockford departmental policies.

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