



United States District Court for the Northern District of Illinois

Simpson, et al. v. Thomas J. Dart in his official capacity as Sheriff of Cook County, Cook County Sheriff's Merit Board, and County of Cook, Case No. 1:18-cv-00553

Class Action Notice

Authorized by the U.S. District Court

You are not being sued. This is not a solicitation from a lawyer. This notice tells you about a class action lawsuit settlement that entitles you to money and to a chance to re-apply for a job as a Cook County Correctional Officer.

Records show that:

1. You applied to be a Correctional Officer at the Cook County Department of Corrections
2. You were not hired because you did not pass one of the written tests or the physical abilities test that were used to screen applicants for the job
3. You are Black (African American)

If the records are correct, then you are:

1. Included in this class action lawsuit alleging race discrimination in hiring.
2. Eligible to receive money from a \$5,675,000 settlement of this lawsuit
and
3. Eligible to re-apply for a Correctional Officer job without having to re-take all the tests

But to receive money or re-apply for the job without fully re-testing, YOU MUST TAKE ACTION BY:

August 5, 2026

You can take action www.SimpsonCookCountySettlement.com

Important things to know:

- If you do nothing, you will still be bound by the settlement, and your rights will be affected. If you don't want to be bound by the settlement, you must "opt out" (as explained in this notice).
- If you still have questions after reading this notice, you can contact the attorneys for the Class at simpsonsettlement@hsplegal.com.
- Re-applying for a Correctional Officer job under this class action settlement does not guarantee employment

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About This Notice

Why did I get this notice?

You received this notice to tell you about the proposed settlement of a class action lawsuit, *Simpson, et al. v. Thomas J. Dart in his official capacity as Sheriff of Cook County, Cook County Sheriff's Merit Board, and County of Cook*, brought on behalf of Black applicants who: (1) applied for Correctional Officer positions at the Cook County Department of Corrections but (2) did not get the job because they did not pass one of the two written tests or the physical abilities test that were administered by the Merit Board and used to screen candidates for the job.

According to records kept by the Cook County Sheriff's Merit Board, you are in this group because you took the first written test after March 13, 2015, but did not pass one of the three tests. If you are in this group, you are a "Class Member" in this class action.

This notice describes the proposed class action settlement agreement. It explains your rights as a Class member and should help you decide whether you want to participate in the settlement and what to do if you don't want to.

What are my options?

As a class member, you have several options:

Options	
Submit a Claim Form to Receive Money	If you want to receive money from the settlement you need to fill out and submit a Claim Form at www.SimpsonCookCountySettlement.com/Login .
Submit a Claim Form AND a Job Application to Receive Money AND Reapply for the Job Under a	If you want to receive money from the settlement <i>AND</i> re-apply for the job, you need to fill out and submit <i>BOTH</i> a Claim Form and a Job Application Form . To receive money from this settlement, you do not have to re-apply for the job. IF YOU WANT BOTH, YOU MUST SUBMIT BOTH. If you submit a Claim Form or re-apply for a job, you will be bound by the settlement if the court approves it.

Special Process for Class Members	
Opt Out	<p>If you don't want to participate in this settlement and be bound by it, you can "opt out." To opt out, you must fill out and submit an Opt Out Form, which can be found at www.SimpsonCookCountySettlement.com/Documents.</p> <p>If you "opt out," you give up your right to any settlement money and you give up the chance to re-apply for the job under the new process created by the settlement. But you preserve any right you might have to bring another lawsuit against Thomas J. Dart in his official capacity as Sheriff of Cook County, the Cook County Sheriff's Merit Board, and Cook County claiming that the tests you took were discriminatory.</p>
Object	<p>If you are dissatisfied with the settlement but want to participate in it anyway, you can write to the Court explaining what you dislike about it. This is called an "objection." Unlike opting out, filing an objection does not keep you from claiming your share of the settlement money or re-applying for the job under the new process created by the settlement. But, to object and still receive your share of the settlement money, you must submit a Claim Form at www.SimpsonCookCountySettlement.com/Login and to re-apply for the job under the new process you must submit the Job Application at https://cookcountyyil.taleo.net/careersection/800/jobsearch.ftl?lang=en</p>
Do Nothing	<p>If you do nothing—neither file a Claim Form, nor a Job Application, nor opt out, nor object—you will not receive any money from the settlement. You will lose the chance to re-apply for a Correctional Officer job through the special process for Class Members. You will get nothing, but you will still be bound by the Settlement.</p>

When do I have to decide? What are my deadlines?

The deadline to object or opt out: **August 5, 2026**

The deadline to submit a claim form: **August 5, 2026**

The deadline to re-apply for a Correctional Officer position under new procedures: **Not earlier than November 27, 2026 (60 days after the Settlement's Effective Date). Visit the Settlement website at www.SimpsonCookCountySettlement.com for the final deadline.**

Learning About the Lawsuit

What is this lawsuit about?

In 2018, several Black applicants for Cook County Correctional Officer jobs sued Thomas J. Dart in his official capacity as Sheriff of Cook County, the Cook County Sheriff's Merit Board, and Cook County, claiming that the three tests administered by the Merit Board to screen candidates for Correctional Officer jobs—the first written test, second written test, and physical abilities test—discriminated against Black applicants.

After extensive, court-supervised negotiations, the parties have reached a settlement. Settling does not mean the defendants admit wrongdoing or that the Sheriff's Office admits responsibility for the Merit Board's tests.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at: www.SimpsonCookCountySettlement.com

Why is there a settlement in this lawsuit?

In 2025, the parties reached an agreement to resolve the lawsuit. This is called a "settlement."

The settlement of a class action decides the rights of all class members. Before the settlement can take effect, the Court must approve it. To decide whether to approve this settlement, the Court will conduct a "Fairness Hearing" on August 28, 2026 at 10:00 AM.

What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement at:

Where: Room 1025 of the United States District Court at the Everett McKinley Dirksen Federal Building, located at 219 South Dearborn Street, Chicago, IL 60604.

When: 10:00 AM on August 28, 2026.

You don't have to attend this Fairness Hearing, but you may if you want to. You can also ask the Court for permission to speak at the hearing to express your opinion about the settlement.

If the Court does not approve the settlement, the lawsuit will continue.

To learn more and to confirm the hearing date, go to www.SimpsonCookCountySettlement.com.

Learning About the Settlement

What does this settlement achieve?

This settlement has five main parts:

1. **Money:** Cook County has agreed to pay \$5,675,000 into a settlement fund. If the Court approves the settlement, this money will be divided among the class members, after paying reasonable attorneys' fees, reimbursing costs incurred in the lawsuit, and providing service awards to the plaintiffs who filed this case. All amounts must be approved by the Court. It is expected that approximately \$3.4 million will be divided equally among Class Members who file claims, up to a maximum of \$10,000 per person.
2. **Jobs:** Under the settlement, Class Members who want to re-apply for the job will be able to re-apply under a revised process agreed to as part of this settlement:
 - a. **Second written test or the physical abilities test.** If you did not pass the second written test or did not pass the physical abilities test, you will not have to retake them if you re-apply for the job under this Settlement.
 - b. **First written test.** If you did not pass the first written test, you get another chance to pass that under this Settlement—using a different scoring system agreed to as part of this Settlement. Depending on the score you got before, you may or may not need to re-take the first written test to achieve a “passing” score under the new scoring system.
 - c. **Disqualifications.** Under this Settlement, candidates who are disqualified for reasons other than their test scores will have the right to appeal their disqualification.

3. **Attorneys' fees and lawsuit costs.** The attorneys who filed and litigated this lawsuit have not been paid for their time and effort—thousands of hours. Nor have they been reimbursed for the out-of-pocket costs they advanced to pay for litigation-related expenses (hundreds of thousands of dollars). They will ask the Court to award them one-third of the settlement funds as fees for their time and risk and also an amount to reimburse them for their out-of-pocket costs.
4. **Service awards for the individuals who filed this case.** The attorneys who filed this lawsuit will also ask the Court to award the people who helped to bring the lawsuit and whose names are on it \$5,000 each, to compensate them for their service. These individuals are: Joseph Simpson, Darius Johnson, Charles Dunner, Jr., Elzina Williams-Gray, and Tiffany Harrison.
5. **Releases.** In exchange for the money and job opportunities, all Class Members who do not “opt out” will “release” their claims, which means they cannot sue Thomas J. Dart in his official capacity as Sheriff of Cook County (the Cook County Sheriff’s Office), the Cook County Sheriff’s Merit Board, or Cook County for the same issues involved in this lawsuit. The complete terms of the release can be found at www.SimpsonCookCountySettlement.com/Documents.

Two Class Members, Joseph Simpson and Charles Dunner, have separate individual claims for alleged injuries not included in and not resolved by the class action. They have separately settled those claims. Their settlement of those claims will not be deducted from the amount recovered for and by the Class.

How much will my payment be?

The amount of your payment will depend on how many Class Members submit Claim Forms and how much the court approves for the costs of settlement administration, attorneys’ fees, reimbursing case costs, and service awards.

The total settlement amount is \$5,675,000. Subject to court approval, there will be four deductions from that amount before funds are distributed to class members who file claims. These four amounts will be deducted: (1) to pay a settlement administrator for administering this settlement (processing Claim Forms and distributing settlement funds to Class Members, a cost estimated at \$31,000; (2) to reimburse Class

Counsel for amounts they paid to fund the case (estimated at \$370,000); (3) to make service awards to the five individuals whose names are on the lawsuit (\$5,000 to each one); and (4) to pay class Counsel's attorneys' fees. Class Counsel will request fees calculated as 1/3 of the \$5,675,000 Settlement recovery.

After approved deductions, the rest of the \$5,675,000 Settlement recovery will be paid to and divided among Class Members in equal shares up to a maximum of \$10,000 per Class Member.

Depending on the number of Class Members submitting Claim Forms and the size of the deductions from the Settlement recovery approved by the Court for the costs of settlement administration, attorneys' fees, reimbursed case costs, and service awards, it is expected that payments to Class Members will be between \$950 and \$2,000, up to a maximum of \$10,000 (minus any legally required deductions for taxes).

What is the new process the Settlement creates for Class Members who want to re-apply for the job?

Under the settlement, you can re-apply for the Correctional Officer position if you are still interested, but this time under a revised process:

1. Class Members' applications will be given priority.
2. Class Members will not have to take (or re-take) either the second written test or the physical abilities test.
3. If you did not pass the first written test when you applied, your test will be re-scored. If the score becomes a "pass" when it is re-scored, you will not have to retake the test. If your score is still too low, you will have a chance to retake the test under the new scoring system.
4. When the Merit Board reviews your application, it will consider whether you have personally ever been affiliated with a gang and will not inquire about friends' or relatives' possible gang ties.
5. If the Merit Board rejects you for a reason other than your test score, you will be given the reason or reasons why you were rejected, and you will have a right to an appeal to ask the Merit Board to reconsider.
6. If the Cook County Sheriff's Office rejects you at any point—for instance, after a polygraph— and then also rejects your internal

appeal, you will have a right to an independent review of the decision by the judge presiding over this case.

How do I reapply for a job under the Settlement?

To re-apply for a Correctional Officer job at the Cook County Department of Corrections under the process created by this Settlement, you must apply online by the deadline, which will be no earlier than November 27, 2026 (60 days after the Settlement's Effective Date). Visit the Settlement website at www.SimpsonCookCountySettlement.com for the final deadline. You can submit an online application at <https://cookcountyyil.taleo.net/careersection/800/jobsearch.ftl?lang=en>.

You do not need to re-apply for the job to receive your share of the money under the Settlement. But all Class Members must complete and submit a Claim Form to receive settlement money.

Re-applying for a job under this Settlement does not guarantee that you will be hired or employed. To be hired, you must re-apply and successfully complete the Settlement's revised hiring process.

Deciding What to Do

How do I weigh my options?

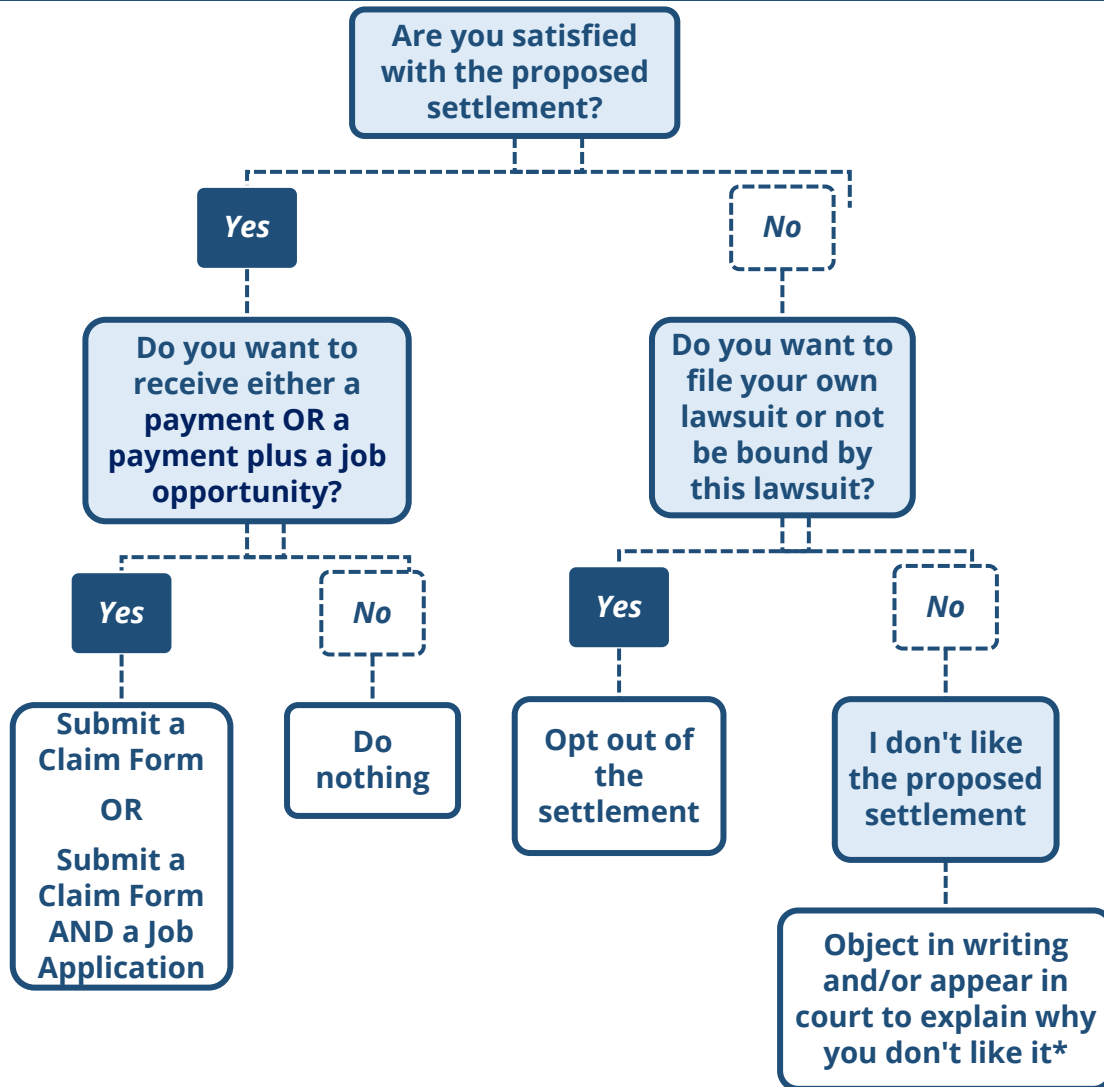
You have **four** options:

1. You can submit a Claim Form and share in the money. And if you want, you can also submit a job application. In return, you will be bound and will release your claims.
2. You can opt out of the settlement. If you opt out, you will not be bound and will not release your claims. You also will not receive any settlement money or the chance to re-apply for the job under new procedures.
3. You can object to the settlement. If you object, you will still be eligible for settlement money and to re-apply for the job under new procedures. You will also be bound and will release your claims.
4. You can do nothing. If you do nothing, you will get nothing, and you will still be bound and will release your claims.

This chart shows your options:

	Submit a Claim	Submit a Job Application	Opt out	Object	Do Nothing
May I receive settlement money if I . . .	YES	YES	NO	YES	NO
Am I bound by the terms of this lawsuit if I . . .	YES	YES	NO	YES	YES
May I pursue my own case if I . . .	NO	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	YES	NO	NO	YES

What is the best path for me?



*You may object to the settlement AND submit a claim form to receive payment.

Submitting a Claim

How do I get a payment if I am a class member?

If you want to receive money, you must fill out and submit a Claim Form. You can use either the online Claim Form or mail a Claim Form to the Settlement Administrator (address below).

Do I have a lawyer in this lawsuit?

In a class action, the court appoints lawyers to work on the case and represent the interests of all Class Members. For this settlement, the Court has appointed the following lawyers.

Your lawyers: Marni Willenson of Willenson Law, LLC; Matthew Piers and Margaret Truesdale of Hughes Socol Piers Resnick & Dym, Ltd.; and Joshua Karsh of Mehri & Skalet, PLLC. These are the lawyers who negotiated this settlement on your behalf.

If you want to hire your own lawyer rather than being represented by the lawyers appointed by the court, you can do that at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be deducted from the Settlement Fund in an amount to be determined by the Court. **You will not have to pay the lawyers directly.**

To date, your lawyers have incurred out-of-pocket expenses of approximately \$370,000 to fund this case and have received no fees for the thousands of hours they have spent litigating this case.

For their work on the case and the Settlement, Class Counsel will ask the Court to approve attorneys' fees equal to one-third of the \$5,675,000 Settlement Fund, or \$1,891,666, plus no more than \$370,000 as reimbursement for the costs they have paid out-of-pocket.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment or the opportunity to

apply for a job under the new procedures created by the settlement. You also cannot object to the settlement if you opt out. However, you will not be bound by the settlement, and you may be able to file your own case.

How do I opt out?

To opt out of the settlement, you must complete the opt out form, which can be found at www.SimpsonCookCountySettlement.com/Documents and mail it by August 5, 2026 to the Settlement Administrator at:

Simpson v. Thomas J. Dart
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
1-888-439-0284

Be sure to include your name, address, telephone number, and signature.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement but don't want to opt out of the settlement (i.e., you still want to participate in the settlement if it is approved), you can object. To object, you must specify the reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement—it cannot change the settlement. If you object, you may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- (1) is postmarked by August 5, 2026;
- (2) includes the case name and number (*Simpson, et al. v. Thomas J. Dart in his official capacity as Sheriff of Cook County, Cook County Sheriff's Merit Board, and County of Cook*, Case No. 1:18-cv-00553);
- (3) includes your full name, address, telephone number, and email address (if you have one);
- (4) states the reasons for your objection;

- (5) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name if you have one;
- (6) includes your signature.

Mail the letter to both:

<i>Simpson v. Thomas J. Dart</i> c/o CPT Group, Inc. PO Box 19504 Irvine, CA 92623 1-888-439-0284	U.S. District Court for the Northern District of Illinois Everett McKinley Dirksen U.S. Courthouse 219 South Dearborn Street Chicago, IL 60604
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Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will not get any money or the opportunity to apply for a job, but you will still be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Sheriff Tom Dart, Cook County Sheriff’s Merit Board, the Cook County Sheriff’s Office and/or County of Cook about the issues in this case.

A full description of the claims and persons who will be released if this settlement is approved can be found at www.SimpsonCookCountySettlement.com/Documents.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement agreement, with all its terms, can be found at www.SimpsonCookCountySettlement.com/Documents. To get a copy of the complete settlement agreement or get answers to your questions:

- contact your lawyers (information below)
- visit the case website at www.SimpsonCookCountySettlement.com

- contact the Settlement Administrator (information below) for questions about filing your claim or receiving payment
- access the Court Electronic Records (PACER) system online or by visiting the Clerk’s office of the Court (address below).

Resource	Contact Information
Case website	www.SimpsonCookCountySettlement.com
Settlement Administrator	<p><i>Simpson v. Thomas J. Dart</i> c/o CPT Group, Inc. PO Box 19504 Irvine, CA 92623 1-888-439-0284</p>
Your Lawyers	<p>Matthew Piers (mpiers@hsplegal.com) Margaret Truesdale (mtruesdale@hsplegal.com) Hughes Socol Piers Resnick & Dym, Ltd. 70 W. Madison St., Suite 4000 Chicago, IL 60602 1-866-344-6230</p> <p>Marni Willenson (marni@willensonlaw.com) Willenson Law LLC 3420 W. Armitage Ave., Suite 200 Chicago, IL 60647</p> <p>Joshua Karsh (jkarsh@findjustice.com) Mehri & Skalet, PLLC 1237 Judson Ave. Evanston, IL 60202</p>
Court (DO NOT CONTACT)	<p>U.S. District Court for the Northern District of Illinois Everett McKinley Dirksen U.S. Courthouse 219 South Dearborn Street Chicago, IL 60604</p>