



DEPARTMENT OF LAW  
CITY OF CHICAGO

June 13, 2019

Patrick Calihan  
UNITE HERE Local 1  
Via email: pcalihan@sbcglobal.net

Re: Notice to Cease and Desist Violations of Settlement Agreement and MCC 8-32-120

Dear Mr. Calihan;

This follows up on our phone conversations and messages regarding the Union's violations of the Settlement Agreement and MCC 8-32-120 at the Cambria picket in front of 166 North Superior Street, Chicago, Illinois. Short-form terms used in this Notice have the same meaning and force as those employed in the Parties' Settlement Agreement entered into as of December 17, 2018.

As we have advised in previous communications to the Union and to you, the Union is in violation of the Settlement Agreement as a consequence of increased noise levels generated in recent weeks by the Cambria picket protestors that exceed the noise levels produced at the Cambria picket prior to October 17, 2018. In addition, the Union's increased noise levels are in violation of MCC 8-32-120 because the Union's protestors are interfering with the functions of Ann & Robert H. Lurie Children's Hospital, located adjacent to the Cambria Hotel.

We have previously demanded that the Union reduce its noise levels to pre-October 17, 2018, levels at the Cambria picket, in compliance with the Parties' Settlement, based upon multiple complaints from Lurie Hospital that the Union is interfering with vital health care-giving functions at Lurie Hospital. Lurie Hospital staff invited the Union and its representatives for a presentation of evidence and a discussion about reducing the Union's noise levels at the Cambria picket, and how the Union's protestors at then-current noise levels were adversely affecting hospital medical staff, administrators, and most critically, patients and families, and interfering with Lurie Hospital's functioning as a health care facility for sick children. Unfortunately, following this meeting between the Union and Lurie Hospital, the Union in fact increased its noise levels at the Cambria picket, despite multiple requests from Lurie Hospital and demands from the City that the Union reduce its noise levels.

Accordingly, this serves as Notice to the Union of the City's demand that the Union immediately cease and desist its violations of the Parties' Settlement Agreement and MCC 8-32-120, pursuant to Chicago ordinance and paragraph 5 of the Parties' Settlement Agreement. If the Union and its protestors do not reduce noise levels at the Cambria picket by 7:00 p.m. today, June 13, 2019 and thereafter for the duration of the Cambria picket, to levels below that generated prior to October 17, 2018 and levels that do not adversely impact the operations of the hospital, the City will take appropriate enforcement action, including issuing appropriate Administrative Notice of Violation to the Union and any of its protestors, and the City will seek to enforce both the Parties' Settlement Agreement and the law.

Sincerely,

Natalia M. Delgado  
City Prosecutor  
Department of Law