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April 10, 2007

Shanetta Y. Cutlar, Chief  
Special Litigation Section  
Civil Rights Division  
United States Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530

Rita McNeil  
City Solicitor  
City of Cincinnati Legal Department  
801 Plum Street, Suite 214  
Cincinnati, OH 45202

Dear Ms. Cutlar and Ms. McNeil:

This letter reflects the Monitor's determinations regarding compliance with the Memorandum of Agreement (MOA) between the United States Department of Justice and the City of Cincinnati. As discussed below, however, please note that the Monitor's determinations stated in this letter are based on the data available to the Monitor, and the actions of the Cincinnati Police Department (CPD), through September 30, 2006, the third quarter of 2006. It does not reflect the work and activity of the CPD in the fourth quarter of 2006, or the first quarter of 2007.

On March 21, 2007, the Department of Justice requested that the Monitor issue a summary report of our compliance determinations regarding the MOA before April 12, 2007, five years from the date that the MOA was signed – April 12, 2002. To provide the CPD and the Department of Justice an opportunity to review a draft of our report, we were asked to provide a draft by April 5, 2007. It would not have been possible for the Monitor to review all of the data and materials related to the fourth quarter of 2006, and to draft a new report, in that time period. To meet the requested reporting schedule, we informed the Department of Justice and the CPD we would have to rely on the compliance determinations made in our January 15, 2007, Fifteenth Report.

### **Provisions In Compliance For Over Two Years**

On July 25, 2006, the City of Cincinnati and the Department of Justice signed an amendment to the MOA that terminated provisions of the MOA that had been in compliance for over two years. On October 10, 2006, we issued a Special Report that identified which provisions had been in compliance for over two years and therefore were terminated. This MOA Amendment recognized the progress that had been made by the City in implementing many of

the MOA provisions, and it also allowed the City and the CPD to focus their efforts in the final year of the Agreement on those areas where its compliance has not been complete.

The Monitor found that the CPD has been in compliance with 49 of the 82 operating MOA provisions for more than two years (60 percent), and those provisions were terminated. There were also two provisions of the MOA that were no longer applicable to the City (MOA ¶¶25, 65) that were also terminated. In the Monitor's 15<sup>th</sup> Report, we determined that an additional provision, MOA ¶11, was in compliance for over two years and was terminated. The list of provision that have already been terminated is attached in Appendix 1. These include provisions related to:

- Mental Health Response Team
- Foot Pursuits
- Development of Use of Force Policies
- Canines
- Beanbag Shotguns and 40 Millimeter Foam Rounds
- Firearms Discharge Board
- Creation of the Citizens Complaint Authority (CIA)
- Training

### **Provisions That Were In Compliance as of the Monitor's 15<sup>th</sup> Report**

For the Monitor's 15<sup>th</sup> Report, we reviewed the 32 MOA provisions that were still in place. We determined that the City of Cincinnati was in compliance with 25 of those provisions. Thus, as of the Monitor's 15<sup>th</sup> report, 76 of the 82 operating MOA provisions were in compliance (93 percent). A chart of the Monitor's determinations from the 15<sup>th</sup> Report is attached in Appendix 2. They include:

- Use of Force Policies
- Chemical Spray
- In-car Mobile Video Recorders (or Digital Video Recorders)
- Use of Force Investigations
- Discipline

### **Provisions That Were in Partial Compliance as of the Monitor's 15<sup>th</sup> Report**

As of the Monitor's 15<sup>th</sup> Report, there were six MOA provisions where the Monitor determined the City of Cincinnati was only in partial compliance. Several of these provisions moved from "not in compliance" to "partial compliance" in 2004 and 2005.<sup>1</sup>

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<sup>1</sup> In addition, there was one provision (MOA ¶66), which was still applicable, but had not taken effect in any of the quarters we reviewed. The provision allows the CPD to propose future

- **MOA ¶24.** This provision requires the CPD to document use of force incidents. For this provision, supervisors who are investigating Taser incidents must document on the Use of Force Report (Form 18 TBFP) that the subject of the force incident was interviewed by the investigating supervisor. In our 15<sup>th</sup> Report, we noted that there has been continued improvement in this requirement, but that the CPD was in partial compliance. Also, on March 27, 2007, the CPD included in its “Staff Notes” to its members a reminder that officers must fill out the Use of Force Reports completely, including documentation of the interview of the subject of the use of force.
- **MOA ¶¶41, 49 and 50.** These provisions relate to the investigations of citizen complaints by the CPD Internal Investigations Section (IIS) and the CCA. While the level of thoroughness of these investigations has improved significantly since the beginning of the monitoring process, we determined there were still investigations that did not meet the requirements of these MOA provisions.
- **MOA ¶¶57, 62.** These provisions relate to the CPD’s risk management system – the Employee Tracking System (ETS). The ETS is now fully functional, and technical issues that had been problems during the course of the Agreement appear to have now been resolved. What is crucial, however, is that the data and analysis in the ETS must be used by the CPD supervisors and management to manage risk and liability, and promote civil rights, as required by the ETS protocol and the MOA. In our 15<sup>th</sup> Report, we found that the City was in partial compliance with these MOA provisions. In addition, in our last two Reports, we noted that when the CCA has determined that a citizen complaint is “not sustained” and the City Manager agrees with this disposition, this determination is not entered into the ETS if the CPD disagrees and determines that the complaint should be exonerated or unfounded.<sup>2</sup>

After the February 1, 2007 Status Conference with Judge Dlott, we agreed with the Department of Justice and the CPD that it would be helpful to have Monitor Team members Joe Brann and Tim Longo, who conduct the majority of our citizen complaint investigation reviews, meet with the managers in IIS and at the CCA to provide their feedback on Cincinnati investigations. This meeting was held on March 14, 2007. Mr. Brann and Chief Longo discussed with the CPD and the CCA the need to ensure that all potential witnesses were identified and interviewed, documentation of whether area canvasses were conducted, and discussed the issues relating to credibility determinations.

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changes to the ETS, subject to review and approval by the Department of Justice. This provision does not have a bearing on compliance.

<sup>2</sup> The number of these cases is not large, and we believe that the same procedures used when there is a disagreement between the CPD and the CCA relating to “sustained” findings can be used for “not sustained” findings. The Monitor discussed this issue with the City Manager, but it was not resolved.

They agreed that, in future reviews of complaint and use of force investigations, if the Monitor Team had questions regarding the investigations or any need for additional documentation, they would contact Captain Isaac or Kenneth Glenn of the CCA directly.

We also agreed that it would be helpful for the Monitor Team to meet with the CPD's Inspections Section to provide our feedback on the ETS. That meeting occurred on March 13, 2007. The Inspections Section's audits identified many of the same concerns raised by the Monitor in our previous reports, and Captain Lee informed us of some of the efforts the Inspections Section has undertaken to work with District Commanders to improve their use of the ETS. Pattern and trends are often not identified, and interventions generally have been limited to driving issues and missed court attendance. Reports also have not included follow-up on the interventions put in place. In addition, not all supervisors were undertaking ETS reviews of officers transferred into units and districts. It is also not clear whether supervisors, managers and commanders are being evaluated on their ability to use the ETS (for example, whether their ETS use is incorporated into decisions on promotions).

To the extent that the complaint investigations and ETS meetings moved the CPD towards compliance, it would be reflected in the work and investigations completed in 2007, which we have not reviewed. We believe that the recent meetings on complaint investigations and the ETS place the CPD on track for future improvement.

The Monitor was requested by the Department of Justice and the Cincinnati Police Department to provide a final report prior to April 12, 2007, the date on which the MOA ends. The Monitor has not reviewed data regarding the CPD's compliance with the MOA for the fourth quarter of 2006 or the first quarter of 2007. Based on the monitoring and evaluation through our January 15, 2007, Fifteenth Report, significant accomplishments in police reforms have taken place in the City of Cincinnati during the past five years. These reforms are a strong foundation for sustained and continued improvement in policing in Cincinnati.

Very truly yours,

Miller, Canfield, Paddock and Stone, P.L.C.

By: \_\_\_\_\_  
Saul A. Green

SAG/plj

**APPENDIX 1**  
**Chart from October 10, Special Report**

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
10	Mental Health Response Team (MHRT)	Comp.
13	Make policy revisions publicly available; publish on website	Comp.
15	Spray on restrained person investigated with tapes; investigations reviewed by Inspections Section	Comp.
16	Sufficient restraining equipment in cars, and officers to be trained to use	Comp.
17	In-service training on chemical spray	Comp.
18	Accounting of spray canisters	Comp.
19	Periodic review of research on choice of spray	Comp.
20	Canines	Comp.
20a	Revise canine policy; improve operations, and introduce “improved handler-controlled alert curriculum”	
20b	Policy shall limit off-leash searches to commercial buildings and search for suspect wanted for offense of violence or reasonably suspected of being armed	
20c	Approval of supervisor needed for deployment	
20d	Loud and clear announcement required before deployment, time to surrender	
20e	Canines not allowed to bite unless subject poses risk of imminent danger, or is actively resisting or escaping	
20f	1. Dog called off at first possible moment 2. Bites of nonresistant suspects prohibited 3. Medical treatment must be sought	
20g	CPD to track deployments, calculate bite ratio monthly	
20h	Bite ratio included in risk management system; 20% ratio triggers review	
21	Beanbag Weapon	Comp.
21a	Define terms in beanbag weapon policy	
21b	Weapons may only be used to incapacitate subject to prevent physical harm	
21c	Prohibit use to prevent theft or minor vandalism	
21d	Prohibit use against crowd, unless specific target who poses threat of imminent physical harm	
21e	Weapon use can be inappropriate even if only option is to let	

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
	subject escape	
21f	Supervisor required to approve use against crowd	
22	Enforce provision limiting simultaneous rounds against single individual	Comp.
23	Verbal warning to be given before use of beanbag shotguns, where distance makes it practical	Comp.
25	Gun pointing contingency	N/A
26	1. Officers to notify supervisors after use of force 2. Supervisors to respond to scene 3. Supervisors involved in incident will not investigate force	Comp.
28	1. IIS will respond and investigate incidents of serious use of force 2. Inspections will review canine bites, beanbags and batons	Comp.
<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
32	Firearms discharge investigations will account for shots, locations, and include ballistic or crime scene analysis	Comp.
33	1. Create firearms discharge board 2. Board will review all discharges 3. Board's reports will determine whether force was in policy, proper tactics were used, lesser force was available	Comp.
34	Firearm Board's policy requirements; return incomplete investigations; annually review patterns; 90 days for review	Comp.
35	Program to inform public of complaint process	Comp.
38	Allegations filed with CPRP, OMI, CCA will be referred to IIS in 5 days	Comp.
39	Complaints evaluated using preponderance of evidence standard	Comp.
40 <sup>3</sup>	Officers involved in incident shall not investigate incident	Comp.

<sup>3</sup> Although the Monitor found the CPD in partial compliance in the 11<sup>th</sup> Report, we are applying the principle of paragraph 111 of the MOA that temporary failure to comply during a period of otherwise sustained compliance should not bar a finding of substantial compliance.

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
42	1. All relevant police activity and each use of force will be reviewed 2. Investigation not to be closed if complaint withdrawn 3. Guilty plea not to be used to decide whether force is in policy	Comp.
43	Complainant will be kept informed	Comp.
44	Each allegation to be closed with one of four dispositions	Comp.
45	Unit Commanders to evaluate investigations to identify problems and training needs	Comp.
47	CCRP complaints will be fully investigated and adjudicated, prior to resolution meeting. Willingness of complainant to participate in resolution meeting will have no bearing on outcome	Comp.
48	CCRP complaints will be handled through chain of command. Investigator will prepare report, with description of incident, summary and analysis of all evidence, findings and analysis. Investigation will be reviewed by District or Unit Commander, who will order additional investigation when appropriate	Comp.
51	CCA will assume all responsibilities from OMI	Comp.
53	CPD officers will answer CCA questions. CCA will have access to CPD records and personnel	Comp.
60	CPD will prepare for review and approval of DOJ a Data Input Plan	Comp.
61	CPD will prepare for review and approval of DOJ a protocol for using the risk management system	Comp.
<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
65 <sup>4</sup>	CPD to use existing databases for risk management until new system implemented	N/A
69	Regular meetings with local prosecutors to identify issues in	Comp.

<sup>4</sup> Although there were several quarters where the CPD was not in compliance with this provision, now that the computerized risk management system (ETS) is in place and operational, this provision is no longer applicable. For this reason, the provision can be terminated.

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
	officer, shift or unit performance	
73	CPD will upgrade its Police Communications Section technology	Comp.
74	CPD will maintain a written protocol or checklist to guide PCS operators on responding to situations	Comp.
77.	1. CPD will coordinate use of force training to ensure quality, consistency and Comp. with policy 2. CPD will conduct regular reviews, at least semi-annually	Comp.
78	Director of training academy will (a) ensure quality of training (b) develop and implement use of force training curricula (c) select and train CPD officer trainers (d) develop and oversee in-service training and roll-call curricula (e) establish evaluation procedures (f) conduct needs-assessments	Comp.

79	CPD will provide training consistent with CPD policy, law and proper police practices; ensure that only mandated objectives and approved lesson plans are taught	Comp.
80	CPD curriculum and policy committee will review all use of force training and use of force policies on regular basis. The committee will include academy staff, command staff, cross section of field personnel, and representative of City Solicitor's office	Comp.
81	Use of Force Training	Comp.
81a	Use of force training will include CPD's use of force model	
81b	Proper use of force decision making	
81c	CPD's use of force reporting requirements	
81d	Fourth Amendment and other constitutional requirements	
81e	Examples of scenarios on force decision making	
81f	Interactive exercises emphasizing proper force decision making	
81g	Proper amount of chemical spray, proper targets and procedure	
81h	De-escalation techniques to allow arrest without force, disengagement, area containment, surveillance, waiting out subject, summoning reinforcements, or letting subject temporarily evade arrest may be appropriate response, even when force is legally justified	
81i	Additional training on extracting subjects from stationary cars and	

	disabling cars	
81j	Threat assessment	
81e	Examples of scenarios on force decision making	

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Status</b>
81f	Interactive exercises emphasizing proper force decision making	
81g	Proper amount of chemical spray, proper targets and procedure	
81h	De-escalation techniques to allow arrest without force, disengagement, area containment, surveillance, waiting out subject, summoning reinforcements, or letting subject temporarily evade arrest may be appropriate response, even when force is legally justified	
81i	Additional training on extracting subjects from stationary cars and disabling cars	
81j	Threat assessment	
81k	Additional training on interacting with persons who are mentally ill	
81l	Factors to consider in limiting or continuing a pursuit	
82	1. CPD will provide all officers charged with accepting complaints training on handling complaints. Training on role of CCA, IIS, CCRP to new recruits and as part of annual in service training 2. Training on burden of proof, factors to consider in assessing credibility, to supervisors responsible for investigating complaints	Comp.
83	Leadership training for CPD supervisors. Provided to sergeants within 30 days of their assuming supervisory responsibilities	Comp.

84	Canine Training	Comp.
84a	Canine training will be modified: development and implementation of comprehensive training curriculum and lesson plan identifying the goals, objectives and mission of Canine Unit, consistent with canine policy as amended by MOA.	
84b	1. CPD shall purchase only professionally bred dogs 2. CPD to ensure that all canines, handlers and supervisors shall be formally trained in the canine policy and can carry it out	
84c	Canines to receive annual recertification and periodic refresher training	
84d	CPD to ensure that handlers are capable of implementing policy; able to maintain control of, and contact with, the canine to ensure that the canine is not allowed to bite a suspect without legal justification	

84e	Canine trainers shall be certified canine instructors	
85	Training instructors engage students in meaningful dialogue regarding scenarios	Comp.
86	CPD to periodically meet with Solicitor's office concerning conclusion of lawsuits involving allegations of misconduct; to be incorporated into training	Comp.
87	Copies of the agreement to be provided to all CPD and relevant City employees. Initial training within 120 days of implementation. Training thereafter to be part of in-service training	Comp.
88	FTOs: 1. The CPD to enhance program. Protocol to address criteria and selection of FTOs, and set standards requiring assessment of officer's past complaint and disciplinary history 2. FTO appointment subject to review for reappointment at Training Director's discretion 3. District Commanders also will have discretion to remove FTO officer, in consultation with Training Director	Comp.
89	FTOs will be reviewed at least bi-annually, with recertification dependent on satisfactory performance and feedback from Training Academy	Comp.
90	1. CPD to ensure that all officers complete mandatory annual re-qualification firearms training 2. Increased in-service firearms training consisting of completion of re-qualification courses and a passing score on target shooting trials 3. Professional night training and stress training in annual in-service 4. CPD will revoke powers of officers failing recertification	Comp.
91	1. Firearms instructors will critically observe students 2. CPD will create and implement a checklist identifying evaluation criteria. Checklists to be completed for each student by instructor; to include: a. maintains finger off trigger; b. maintains proper hold and stance; c. uses proper force decision making	Comp.

**PROVISIONS THAT WILL BE TERMINATED:**

10, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 28, 32, 33, 34, 35, 38, 39, 40, 42, 43, 44, 45, 47, 48, 51, 53, 60, 61, 65, 69, 73, 74, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91

**PROVISIONS THAT WILL REMAIN IN EFFECT**

11, 12, 14, 24, 27, 29, 30, 31, 36, 37, 41, 46, 49, 50, 52, 54, 55, 56, 57, 58, 59, 62, 63, 64, 66, 67, 68, 70, 71, 72, 75, 76

**APPENDIX 2**  
**Chart from Monitor's 15<sup>th</sup> Report**

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Compliance Status</b>
11	Foot pursuits	Compliance
	<b>This provision has been in compliance for over two years and will now be terminated.</b>	
12	Use of Force	Compliance
12a	Use of Force Policy shall use clear terms	
12b	Define force as in MOA	
12c	Incorporate force model	
12d	Individuals should be allowed to submit to arrest before force is used	
12e	Advise that excessive force will subject officers to discipline	
12f	Prohibit chokeholds	
12g	Remove term "restraining force" from policies and procedures	
14	Chemical Spray	Compliance
14a	Define terms in chemical spray policy	
14b	Limit spray to cases where force is necessary to protect persons, to effect arrest, or prevent escape	
14c	Spray used only where verbal commands would be ineffective or endanger officer	
14d	Supervisory approval needed for spray on crowd, absent exigency	
14e	Verbal warning and time for compliance required, unless dangerous	
14f	Aim at upper torso and face	
14g	Guidance on duration and distance for spray	
14h	Decontamination within 20 minutes	
14i	Medical attention when needed	
14j	Don't keep subject face down	
14k	Spray on restrained persons used only when subject or other likely to suffer injury or escape	
24	1. All uses of force reported as CPD reports use of	Compliance

MOA Para.	MOA Requirement	Compliance Status
	force 2. Report form will indicate each and every type of force 3. Report to contain supervisor's narrative, and taped statement 4. Supervisors shall have access to force reporting database 5. Special form for canine deployments, tracking	Partial Compliance with respect to revised MOA ¶24 for Taser incidents
27	1. Supervisors will investigate force. Include description of facts 2. Investigation will review basis of stop and seizure	Compliance
29	1. Prohibit investigators from asking leading questions 2. Consider all relevant evidence and make credibility determinations 3. No automatic preference for officer 4. Resolve material inconsistencies	Compliance  Unable to monitor leading questions
30	All officers who witness force will provide a statement; be identified on force form; and forms will indicate whether medical care was provided, or refused	Compliance
31	1. Lieutenant or higher will review each investigation and identify deficiencies 2. Appropriate corrective action taken for deficient investigations	Compliance
36	1. Complaint forms available at various locations, CPD stations, in police vehicles 2. Officers will not discourage any person from making complaint	Compliance
37	1. Complaints can be made through variety of processes 2. Every complaint will result in written form 3. Every complaint resolved in writing. Complaint will have unique identifier, and be tracked by type	Compliance

<b>MOA Para.</b>	<b>MOA Requirement</b>	<b>Compliance Status</b>
41	1. Investigating agency will consider all relevant evidence 2. No automatic preference 3. Resolve material inconsistencies 4. Consider and train investigators on credibility determinations	Partial Compliance
46	IIS will investigate complaints of force, pointing firearms, searches and seizures and discrimination. IIS will determine which complaints it investigates. Only complaints not in IIS jurisdiction will be eligible for CCRP	Compliance
49	Thoroughness of investigations	Partial Compliance
49a	IIS investigations will have taped interviews of complainant, officers and witnesses	
49b	Interviews of complainant and witnesses will be at times and sites convenient for them when practicable	
49c	Prohibit group interviews	
49d	Notify supervisors of investigation	
49e	Interview all appropriate CPD officers, including supervisors	
49f	Collect and analyze appropriate evidence, including canvassing of scene	
49g	Identify all material inconsistencies in officer and witness statements	
50	1. IIS report will include description of allegation, summary of all evidence, proposed findings and analysis 2. IIS will complete investigations within 90 days absent exceptional circumstances	Partial Compliance with first requirement  Compliance with time period requirement
52	1. All complaints will be directed to CCA 2. CCA will have jurisdiction over, and will investigate itself, excessive force, improper pointing of firearms, unreasonable searches and discrimination complaints	Compliance

	3. CCA will accept third party complaints 4. CCA will have sufficient investigators	
54	City to develop procedures re timing, notification, and interviewing of witnesses so parallel investigations are effective	Compliance
55	City will take appropriate action, including imposing discipline or non-corrective action where warranted, regarding CCA investigations	Compliance

56	1. CCA will complete investigations within 90 days 2. City Manager to take action within 30 days of completion of CCA investigation	Compliance
57	CPD to expand risk management system. Use system to promote civil rights and manage risk and liability	Partial compliance
58	System will collect 10 data elements	Compliance
59	System will include appropriate identifying information for each officer	Compliance
62	Use of Risk Management System	Partial Compliance
62a	Protocol will contain data storage, retrieval, reporting, analysis, pattern identification, supervisory assessment	
62b	Protocol will require system to analyze data on individual officer, average activity, patterns by officers, and by all officers within unit	
62c	Protocol will require system to generate monthly reports describing data, data analysis, identifying individual and unit patterns	
62d	CPD commanders, managers, and supervisors to review system reports (at least quarterly) and evaluate individual officer, supervisor and unit activity	
62e	CPD commanders, managers, and supervisors initiate interventions for officers, supervisors or units based on activity and pattern assessment	
62f	Intervention options include discussion, counseling, training, monitored action plans. All interventions to be documented in writing	
62g	Actions taken will be based on all relevant information, not just numbers	
62h	Data to be accessible to commanders, supervisors and managers, and supervisors will promptly review data on officers transferred into their units	
62i	Commanders, managers and supervisors will be evaluated on their use of system	
62j	System to be managed by Inspections. Inspections	

	will do quarterly audits	
62k	Protocol will require regular reviews (not less than quarterly) of all relevant risk management system information to evaluate officer performance citywide, and make appropriate comparisons regarding performance of units to identify patterns or series of incidents	
63	City will maintain officer data in system during officer's employment and five years after. Aggregate statistical data will be kept indefinitely	Compliance
64	System to be developed on specified schedule	Compliance
66	CPD may propose future changes, subject to review and approval of DOJ	N/A
67	CPD to develop protocol for audits, with regular fixed schedule for audits	Compliance
68	1. CPD will conduct quarterly audits of CCRP complaints 2. CPD will conduct semi-annual audit if IIS investigations	Compliance
70	MVRs	Compliance
70a	Mandatory activation of video cameras for all traffic stops, pursuits	
70b	To the extent practical, recording of requests for consent to search, vehicle searches, drug detection canines	
70c	To the extent practical, manual activation for incidents in which the prisoner being transported is violent	
70d	Supervisors to review tapes from incidents involving force, injuries to prisoners, vehicle pursuits, complaints	
70e	CPD to retain and preserve tapes for at least 90 days, or longer when incident is subject to investigation	
71	If officer knows camera is not working, officer will notify shift supervisor	Compliance

72	<p>1. CPD will conduct periodic random reviews of MVR tapes for training and integrity purposes. Reviews will be documented in a log book</p> <p>2. CPD to conduct random reviews of equipment</p>	Compliance
75	<p>1. CPD will revise its disciplinary matrix to take account of violations of different rules rather than just repeated violation of same rule</p> <p>2. CPD will revise matrix to increase penalties for excessive force, improper searches and seizures, discrimination, or dishonesty. Revised matrix will allow CPD to impose appropriate punishment when misconduct exhibits lack of fitness for duty</p>	Compliance
76	CPD will take disciplinary action when matrix calls for disciplinary action. CPD will consider non-disciplinary, corrective action (in addition to discipline) even where discipline is imposed	Compliance

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