

POLICE PRACTICES REVIEW

A Publication of the Police Assessment Resource Center

October 2004
Vol. 3, No. 10

- 1 **CIVILIAN OVERSIGHT**
Panel Issues Findings on Miami FTAA Protests
Berkeley Commission Issues Statistical Report
- 3 **CONSENT DECREES/
MEMORANDA OF AGREEMENT**
Detroit Monitor Releases Fourth Quarterly Report
Cincinnati Mayor Looks to End Agreement
- 4 **ACADEMIC RESEARCH**
- 5 **RACIAL PROFILING**
MA Attorney General Upholds Data Collection
- 6 **FORCE MANAGEMENT**
Boston Suspends Use of Pepper-Ball Launcher
- 6 **STANDARDS & TRAINING**
Revised Training for LAPD Recruits
- 6 **LEGAL AFFAIRS**
Second Mistrial in Pepper Spray Case
- 7 **A LOOK AT THE NACOLE CONFERENCE**
- 7 **NEWS BRIEFS**
U.S. Virgin Islands Oversight Proposal Passes
Oakland Revises Crowd Control Policy
- 8 **INTERVIEW**
San Jose Independent Police Auditor
Teresa Guerrero-Daley
- 17 **CONFERENCES**

CIVILIAN OVERSIGHT

Panel Issues Findings on Miami FTAA Protests

During last November's Free Trade Area of the Americas (FTAA) meeting in Miami, a multi-agency law enforcement operation responded to several days of demonstrations. The effort involved approximately 40 agencies, including the Miami-Dade County Police Department (MDPD), whose civilian oversight board, the Independent Review Panel (IRP), recently released its investigative findings concerning the Department's policing of the demonstrations.

The IRP's Inquiry Report, which is based on fact-finding meetings and public hearings addressing specific issues such as prisoner processing, police deployment, and use of force, presents 32 findings about Miami-Dade's and other agencies' response to the protests.

Although the City of Miami Police Department (MPD) was the lead law enforcement agency in charge of crowd control during the event, MDPD "did not cede command to the Miami PD or any other" agency but rather responded to MPD requests. The IRP found that the lack of a unified FTAA law enforcement command caused difficulty in determining "accountability for police actions, and often resulted in 'we don't know who is responsible for that' as the response to questions about specific police actions." The IRP recommended that MDPD adopt a policy providing for a unified control and a clear chain of command in future joint policing ventures.

The IRP noted that MDPD "only used less-lethal munitions two times" during the FTAA demonstrations and was not the agency against which much of the public criticism was aimed. "The internationally publicized pictures of police deploying gas and shooting less-lethal weapons at non-violent

PARC

POLICE
ASSESSMENT
RESOURCE CENTER

Biltmore Court
520 South Grand Avenue, Suite 1070
Los Angeles, California 90071

Tel (213) 623-5757
Fax (213) 623-5959
Email: information@parc.info

POLICE ASSESSMENT RESOURCE CENTER

With the generous support of the Ford Foundation, PARC, in cooperation with monitors, law enforcement executives, civic and government officials, and other interested constituencies, aims to strengthen police oversight so as to advance effective, respectful, and publicly accountable policing.

Board of Trustees

John Dunne, *Chairperson*
Esther Bush
Zachary Carter
Geoffrey Cowan
Michael Graham
Wade Henderson
Bonnie Guiton Hill
Lowell Johnston
Christopher Stone
Elizabeth Watson

Senior Advisors

Ronald Davis
William Finney
Thomas Frazier
Bernard Melekian

President

Merrick Bobb

The *Police Practices Review* is published 12 times a year by the Police Assessment Resource Center.

Copyright © 2004, all rights reserved. Material in this newsletter may be reproduced and/or circulated without permission when proper acknowledgement is made.

No copyright is claimed in the text of the statutes, regulations and excerpts from court opinions quoted in this work. The opinions expressed herein are not those of PARC and their inclusion herein does not constitute an endorsement by PARC.

To subscribe to the *Police Practices Review* (or to access it electronically), visit our website at www.parc.info.



protesters," noted the report, "were not pictures of Miami-Dade Police Department officers."

According to the report, the Department allowed insufficient time for demonstrators to disperse from a protest on November 21—a videotape recording showed MDPD officers arresting individuals who had begun dispersing before a two-minute deadline. The IRP recommended MDPD adopt specific written standards about "the method of announcement and the execution of dispersal orders," together with sample scripts of what officers could broadcast to a crowd before dispersion to ensure that participants are able to hear and understand the orders and are allowed adequate time to comply. In another finding, the IRP criticized Miami-Dade for deploying officers in riot gear without visible identification, leading some citizens to complain about difficulty in identifying specific officers and their agencies. The full IRP inquiry report can be accessed online at <http://www.miamidade.gov/irp/>.

Berkeley (CA) Commission Issues Statistical Report

The Berkeley Police Review Commission (PRC) recently published its 2003 Statistical Report, marking 30 years of commission operations. The PRC receives and investigates citizen complaints against Berkeley Police Department (BPD) officers and also reviews Department policies and procedures. Completed investigations can result in public evidentiary hearings chaired by three PRC commissioners. Complainants and officers testify at the hearings and can question the various involved parties.

Of the 51 cases closed in 2003, 24 had full hearings, 21 were closed through administrative action, four were closed with mediation, and the remaining two were policy matters that all commissioners reviewed. The PRC received a total of 47 new complaints last year, containing 211 allegations altogether—or an average of 4.5 allegations per complaint. Improper arrest, search, stop, and detention allegations comprised a plurality of the allegations, followed by discourtesy and improper use of force. No complaints citing the subcategory of "serious excessive force" were filed. Out of the 26 improper use-of force allegations, 14 resulted in hearings with four allegations ultimately sustained. By comparison, there were 25 such allegations in 2002, of which 21 went to hearings with 10 of them sustained.

African Americans, who represent 13.3 percent of Berkeley's population, filed 64 percent of the complaints the PRC received (30 complaints). Whites, 55.2 percent of the city, lodged 26 percent (12 complaints). There were 13 discrimination complaints in 2003; African-American complainants filed all 13. However, observed the PRC, "only approximately 42 [percent] of the discrimination complaints alleged racial bias" as opposed to other forms such as sexual, religious, or political discrimination.

The report highlighted several PRC policy recommendations, including one that the City Council request that Alameda County and city courts update records of probation status, stipulations, and stay-away orders to prevent police officers from acting on incorrect information. The PRC also recommended that the Berkeley Police Department (BPD) hold roll call training for officers regarding Berkeley's policy that marijuana laws be given lowest priority enforcement. "Due to the high turnover of BPD officers in the last several years, and recent cases involving marijuana enforcement," the report stated, "there was concern that some officers were unaware of the City policy on marijuana enforcement." For more information about the PRC and to access its reports, go to <http://www.ci.berkeley.ca.us/prc/>.

CONSENT DECREES/ MEMORANDA OF AGREEMENT

Detroit Monitor Releases Fourth Quarterly Report

The City of Detroit and the U.S. Department of Justice (DOJ) jointly filed two Consent Judgments in federal court on June 12, 2003. The two agreements—the Use of Force and Arrest and Witness Detention Consent Judgment (UOF CJ) and the Conditions of Confinement Consent Judgment (COC CJ)—outlined a wide array of changes the City of Detroit and Detroit Police Department (DPD) were required to make in order "to improve the overall policing in the City of Detroit by remedying the unconstitutional conduct alleged by the DOJ in its complaint filed against the City and the DPD." During the fourth quarter of monitoring ending August 31, the Monitor examined a total of 103 paragraphs and subparagraphs in the two consent judgments that describe required tasks the City and DPD must complete. Of the 103, the

DPD had complied with two and failed to comply with 96; the Monitor withheld determinations on the remaining five.

According to the Monitor, "one of the most prevalent challenges facing the Department is policy development, which must take place in an effective manner before many of the other reforms can be achieved." The report did commend the DPD for making the most significant progress in policy development in the quarter since monitoring began. Policies approved by the Chief of Police and the Board of Police Commissioners in the fourth quarter include Detainee Transportation, Detainee Suicide Prevention, Baton Training, Crime Scene Investigation, and Citizen Complaint Intake and Tracking.

Required DPD policies on firearms re-qualification and shooting at moving vehicles, use-of-force and prisoner injury investigations, and a performance evaluation system were among those found not to be in compliance with the UOF CJ. The Monitor also noted the Department's non-compliance with a provision requiring that DPD officers report any misconduct on the part of other officers, whether on- or off-duty. While the DPD issued a directive to fulfill the judgment's reporting requirement, "it falls short of describing how the DPD will achieve the core requirement of the paragraph—enforcement," according to the Monitor. The Monitor was "quite positive" about the DPD's implementation of a digital video system for prisoner processing areas in each precinct station, pursuant to the COC CJ. Though the DPD is not yet in compliance with the paragraph, the video system's initial capabilities impressed the Monitor, who said the system will correct videotape storage problems addressed by the UOF CJ.

The DPD's failure to complete any of the annual or semiannual audits mandated by both judgments was one of the report's highlighted major concerns. The audits cover areas such as misconduct allegations, witness identification and questioning, prisoner injuries, and holding cell environmental health and safety. "Until these audits are completed," the Monitor explained, "the DPD will remain in non-compliance with each of the paragraphs requiring the submission of audits, and the DPD's ability to evaluate its operations, address concerns and make improvements will be significantly hampered." The fourth quarter also marked the first anniversary of

ACADEMIC RESEARCH

In “COMPSTAT and Bureaucracy: A Case Study of Challenges and Opportunities for Change,” the effect of the implementation of COMPSTAT in a mid-size police department is explored. The authors, James J. Willis, Stephen D. Mastrofski, and David Weisburd, provide an in-depth look at the effect of COMPSTAT on a police department’s organizational structure. The article appeared in the September issue of *Justice Quarterly*.

According to the article, COMPSTAT, a program originally implemented in the New York City Police Department (NYPD), was designed to change organizational structure and processes. Specifically, it was created to reduce the bureaucracies associated with the centralized command of police departments. The authors identified seven key elements of COMPSTAT that are central to its goal of changing organizational structure: mission clarification, internal accountability, geographic organization of operational command, organizational flexibility, data-driven analysis of problems and assessment of department’s problem-solving efforts, innovative problem-solving tactics, and external information exchange.

To examine the impact of COMPSTAT on the organizational structure of a police department, the authors studied the Lowell Police Department (LPD) in Lowell, Massachusetts. LPD is a mid-size department that employed 260 sworn officers at the time of study and served a population of 105,167. LPD had implemented COMPSTAT by early 1997.

Previous research has found differences between police departments that did and did not implement COMPSTAT. Several areas in which departments differed were having a clarified mission, strong internal accountability mechanisms, and the use of (crime) data. Departments using COMPSTAT did not differ from other departments in areas like external information exchange or organizational flexibility. The purpose of the current study was to explore why departments differed in only some areas and why elements of COMPSTAT were unevenly implemented.

The study found that certain elements of COMPSTAT were in direct conflict with the structure and needs of a police department. LPD was similar to other departments using COMPSTAT in that only certain components of COMPSTAT were successfully applied. Specifically, COMPSTAT “helped top management mobilize the rank and file by reinforcing the traditional police organization’s focus on crime control.” COMPSTAT also helped increase accountability by placing greater authority at the district level instead of a centralized command and establishing performance criteria for middle-level managers. These accountability mechanisms reinforced the traditional command hierarchy as well. Although more authority was placed at the district level, many decisions were still made from a centralized command structure and not geographically based, as COMPSTAT is designed to promote.

One key element of COMPSTAT that did not succeed in the LPD was the implementation of innovative crime-control techniques. The stronger measures of accountability and reinforcement of the traditional hierarchy within the Department created organizational barriers for the identification and experimentation with new problem-solving tactics. According to the authors, “By strengthening these features (accountability and rank hierarchy), COMPSTAT hindered brainstorming and reduced tolerance for risk. This, in turn, limited innovation.”

The authors conclude by noting that while COMPSTAT was a response to the specific organizational *dysfunction* of the NYPD, COMPSTAT is not a one-size-fits-all program and may be subject to bureaucratic influences. *Justice Quarterly*, September 2004; Vol. 21, No. 3

the start of the Consent Judgments. The report said the COC CJ could have ended after one more year (two years after it first began) had the City and the DPD come into substantial compliance with each provision by the first-year mark. The City instead filed a motion during the quarter to extend the COC CJ beyond the two years, the Monitor noted. The full quarterly report can be accessed online at http://www.krrollworldwide.com/library/detroit/DPD_Q4_Report_10-18-2004.pdf.

Cincinnati Mayor Looks to End Agreement

In an October letter to the U.S. Justice Department, Cincinnati's mayor asserted that the Cincinnati Police Department (CPD) no longer required federal oversight, according to media reports. In 2002, the City, CPD, U.S. Justice Department, and community groups reached two agreements after riots had erupted when a CPD officer shot to death an unarmed, African-American man wanted on misdemeanor charges who ran from the police. The Memorandum of Agreement between the Justice Department, the City of Cincinnati, and CPD calls for reforms in areas such as use of force, officer training, and civilian complaint investigations, while the Collaborative Agreement between the CPD, the officers' union, and plaintiffs American Civil Liberties Union of Ohio and the Cincinnati Black United Front, focuses on implementation of community policing and improving police accountability.

Cincinnati Mayor Charles Luken asked the Justice Department to lift the five-year Memorandum, which can only be ended early with the U.S. District Judge's permission. Citing CPD's new civilian complaint intake system, soon-to-begin officer tracking system, and deployment of Tasers—which he said had brought down use-of-force incidents over the past year—Luken argued that the police department had achieved its goals and should be able to operate without the remaining two-and-a-half years of federal monitoring. Cincinnati's independent monitor, Saul A. Green, stressed that his quarterly reports show that more improvement is still necessary. DOJ said it would consider Mayor Luken's request. *Cincinnati Enquirer*, October 6, and October 12, 2004; *Associated Press*, October 7, 2004.

RACIAL PROFILING

MA Attorney General Upholds Data Collection

Commonwealth of Massachusetts Attorney General Tom Reilly has upheld Secretary of Public Safety Edward Flynn's order that 247 state law enforcement agencies collect traffic-stop data for one year to determine whether they engage in racial and gender profiling. The order followed Northeastern University's "Massachusetts Racial and Gender Profiling Study," a report commissioned by the Legislature to analyze traffic-citation, warning, and search data and practices of 366 agencies between April 2001 and June 2003. Northeastern University's Institute on Race and Justice used four measures to gauge agencies' treatment of various groups; the 249 agencies Flynn originally ordered to collect data for one year were identified in the report "as having substantial disparity in one or more" of the measures. (PARC described this report in *May's Police Practices Review*.) One hundred-thirty of the 249 departments appealed the order, but only two—Royalston and Stockbridge—succeeded in their appeals and will not need to collect additional information. Reilly's office determined that Northeastern's report used an insufficient amount of data to adequately identify possible disparities in those two departments.

The one-year data collection order requires the departments to gather information on all traffic stops, including those that do not result in a warning, citation, search, or arrest. Reilly acknowledged that neither his decision nor Secretary Flynn's order suggested that any of the departments had engaged in racial profiling, explaining in a letter upholding the data collection that "the Secretary identified those police departments whose racial disparities in the issuance of citations or warnings and/or in searches performed suggested the potential that they engaged in racial profiling, among other possible explanations for the racial disparity." Under the Legislature's 2000 statute that commissioned the profiling study, departments subsequently required to perform the additional data collection could appeal the mandate to the Attorney General.

In his letter, the Attorney General praised the study for giving "all law enforcement agencies in the Commonwealth an important opportunity to address the public's perception that law enforcement officers

use illegal and improper forms of profiling,” adding that effective enforcement of traffic laws protects public safety. With additional data from the 247 agencies, said Reilly, “departments across the Commonwealth can identify policy changes and improvements in supervision, review and monitoring of traffic enforcement data, and officer training so that police departments and the public can confidently conclude that racial profiling does not occur in their communities.” The Attorney General’s letter and press releases can be accessed online at <http://www.ago.state.ma.us/>. The study can be accessed at <http://www.racialprofilinganalysis.neu.edu/>. *Boston Globe*, October 20, 2004.

FORCE MANAGEMENT

Boston Suspends Use of Pepper-Ball Launcher

Following the death of Emerson College student Victoria E. Snelgrove, killed when officers shot pepper balls into a crowd, the Boston Police Department (BPD) suspended its use of the pepper-ball launcher employed in the incident until the conclusion of an investigation. BPD officers used crowd-control weaponry in response to the allegedly rowdy crowd celebrating a Red Sox victory. The female college student was struck in the eye and killed by one of the projectiles. The plastic, spherical projectile is fired using a compressed-air gun and is designed to break upon impact and release a pepper powder irritant.

FN Herstal, the company that manufactures the FN303 Launcher the BPD used in the incident, warns on its web site to “never aim at the face” and recommends a distance between 30 and 50 meters. The company says the FN303 fires pepper balls at a velocity of 85 to 90 meters per second, or approximately 183 to 194 miles per hour. The *Boston Globe* reported that a BPD officer familiar with less-lethal weapons and crowd-dispersion tactics said the Department trains officers to aim pepper balls at a person’s chest area so that the chemical will rise up to the face. The same officer reportedly said that pepper balls can curve in flight; one purported theory about the death is that the projectile’s path rose until it hit the student in the face.

The Department reportedly procured less-lethal, crowd control weapons before the Democratic National Convention held in Boston during the

summer. After the Snelgrove incident, the BPD announced that it would replace the FN303 with a less powerful, pepper-ball gun for the time being. The FN303 manufacturer noted that “the age, the constitution, [and] the mental condition” of an individual fired at, in addition to external factors, are among the variables influencing a projectile’s effect. More information about the FN303 can be accessed at <http://www.fnherstal.com>. *Boston Globe*, October 22, 2004; *Associated Press*, October 23 and 24, 2004; *Washington Post*, October 24, 2004.

STANDARDS & TRAINING

Revised Training for LAPD Recruits

The Los Angeles Police Department (LAPD) recently announced its intention to enhance training of recruits to encourage them to intervene when fellow officers appear to be out of control in using force. The training change comes several months after the televised incident in which an LAPD officer hit car-theft suspect Stanley Miller 11 times with a flashlight while other officers looked on. Announcing the training enhancement at a joint news conference, LAPD Chief William Bratton and Los Angeles Mayor James Hahn told reporters they had planned to revise the training before the June 2004 incident.

The training will focus less on lectures and more on role-play situations to hone officers’ judgment and decision-making skills for dealing with fellow officers who appear to be engaging in misconduct during encounters with residents or suspects. The revised training curriculum encourages recruits to intervene if another officer loses control, and while the LAPD Academy had previously addressed an officer’s duty to intervene, the new program focuses on identifying situations that require intervention. *City News Service*, October 5, 2004; *Associated Press*, October 6, 2004; *Los Angeles Daily News*, October 6, 2004.

LEGAL AFFAIRS

Second Mistrial in Pepper Spray Case

A seven-year legal battle over pepper spray usage during three protests in Humboldt County (CA)

A LOOK AT THE NACOLE CONFERENCE

The National Association for Civilian Oversight of Law Enforcement (NACOLE) held its 10th Annual Conference, from October 17 through 20, in Chicago. The conference was attended by more than 150 oversight professionals, police executives, and elected officials. The conference's keynote speaker, University of Wisconsin Law School Professor Herman Goldstein, discussed his work and progress made on racial profiling and problem-oriented policing. Additionally, NACOLE gave a special achievement award to out-going San Jose Independent Police Auditor Teresa Guerrero-Daley (PARC's interviewee in this newsletter) for her more than ten years as one of the country's top professionals in the civilian oversight field.

Concurrent sessions throughout the four-day conference allowed participants to attend presentations on topics such as civilian oversight as a risk management tool; best investigative practices; federal "pattern or practice" investigations and subsequent monitoring of local police departments; and development of successful police review boards and commissions, with presentations including training on how to handle a wide variety of complaint investigations. Several sessions focused on the experiences of specific law enforcement agencies and their oversight bodies. For example, one session focused on use of force in the Los Angeles Police Department and featured panelists Andre Birotte, the Inspector General for the LAPD; Deputy Chief and Office of Professional Standards Bureau Commander Michael Berkow; and member of the "pattern or practice" consent decree monitoring team, Jeff Schlanger of Kroll, Inc.

recently resulted in a second mistrial in federal court. Humboldt County sheriff's deputies and, in one incident, City of Eureka police officers swabbed pepper spray on anti-logging protesters' eyes with cotton swabs after the activists had locked their arms together with metal cylinders to prevent forcible separation. Authorities said that deputies and officers applied the pepper spray to activists instead of using metal grinders to cut the cylinders because the ensuing sparks could have created a fire hazard because of wood chips or products close to each protester. Plaintiffs in the lawsuit against Eureka and county law enforcement agencies and authorities contended the pepper spray had caused chronic problems such as impaired vision, according to the *New York Times*.

Since 1997, the incidents have been the subject of litigation that led to an initial mistrial in 1998 because of a deadlocked jury. The case was tried again beginning in 2004, but the jury could not reach a unanimous decision, as was required in this case. As with the first lawsuit, plaintiffs in the second trial alleged they had been subjected to unreasonable and excessive force in violation of their constitutional rights. The defendants said they would seek to dismiss the case, while plaintiffs vowed to secure a retrial. *Headwaters Forest Defense v. County of Humboldt*, 240

F.3d 1185, 2000 U.S. App., May 4, 2000; *Headwaters Forest Defense v. County of Humboldt*, 276 F.3d 1125, 2002 U.S. App., January 11, 2002; *New York Times*, September 22, 2004; *Los Angeles Times*, 2004; *Associated Press*, September 23, 2004.

NEWS BRIEFS

U.S. Virgin Islands Oversight Proposal Passes

The U.S. Virgin Islands Legislature recently passed the 2004 Omnibus Justice Bill, which among other provisions creates a civilian review board. The Virgin Islands Law Enforcement Review Commission would review and investigate allegations against law enforcement officers about misconduct including excessive or deadly force, bribery, and discriminatory treatment. It would be authorized to subpoena witnesses and documents for its hearings and would issue recommendations to the Virgin Islands Justice Department and the police commissioner; it would not have authority to impose discipline on officers. The bill awaits signature by the Virgin Islands governor who, together with the president of the Virgin Islands Bar Association, would appoint the commission's nine members. The governor would be responsible for

picking seven of the members which must include a retired law enforcement officer, a member of the Chamber of Commerce, a victims' rights advocate, and an individual who resides in public housing and serves on a public housing tenant council. The Bar Association's two selections must be active association members. All commission members would be subject to the Legislature's confirmation. *Associated Press Worldstream*, September 30, 2004; *Virgin Islands Daily News*, September 30 and October 1, 2004.

Oakland Revises Crowd Control Policy

Oakland city officials recently reached an agreement with plaintiffs' and civil rights attorneys that bars the Oakland Police Department (OPD) from using several crowd control weapons and tactics, according to a statement issued by the civil rights groups. According to reports, the agreement bans weapons for use in dispersing crowds including: skip-fired wooden projectiles and stinger grenades; rubber bullets; Tasers; and pepper spray. The new OPD policy also prohibits the use of motorcycles to disperse crowds.

The changes come as a partial settlement of a class-action lawsuit filed by demonstrators after an April 2003 anti-war protest; the OPD policy revisions do not resolve monetary claims by those injured as a result of police actions during the demonstration. The protest occurred at the Port of Oakland, where the OPD alleges demonstrators refused to disperse and threw rocks and bottles at officers. Demonstrators deny the OPD claims regarding thrown objects, saying instead that officers fired projectiles directly at the protesters, instead of bouncing them off the ground, and assert that OPD's dispersal orders were inaudible.

Under the new policy, the OPD will retain the right to fire bean-bag projectiles, but only at individuals presenting an imminent threat to officers, civilians, or property, not for purposes of crowd control. "Non hand held crowd control chemical agents" may be used if authorized by a supervisor or command officer and after a crowd is warned that the agent is about to be used and allowed sufficient time to disperse. The policy also requires that the OPD establish and maintain communication with protest organizers. http://aclunc.org/police/041109-opd_policy.pdf. *Contra Costa Times*, November 6, 2004; *Oakland Tribune*, November 6, 2004; *KTVU TV*, November 7, 2004; *Sacramento Bee*, November 10, 2004.

INTERVIEW

Teresa Guerrero-Daley was appointed as the first San Jose (CA) Independent Police Auditor (IPA) when the office opened in 1993. The Office of the IPA was created to audit citizen-complaint investigations of misconduct by San Jose Police Department (SJPD) officers. In addition to providing independent review of such investigations, the IPA issues policy recommendations to the Department and conducts public outreach to assist the community with the complaint process. Mrs. Guerrero-Daley reports directly to the San Jose Mayor and City Council. This oversight model, which she helped establish more than ten years ago, has been replicated in numerous cities across the country. She is a lawyer, specializing in criminal law, and prior to becoming the IPA, was a lawyer in private practice, a criminal investigator and a Drug Enforcement Administration special agent. In March 2004, Mrs. Guerrero-Daley was elected to a Santa Clara County Superior Court judgeship and will soon leave the IPA's Office for her seat on the bench. On a personal note, Merrick Bobb, PARC's President, would like to congratulate Teresa on her outstanding contributions to the field of police oversight. Her long tenure speaks highly of her skills at gaining the trust of both the Police Department and communities the Department serves. She is a pioneer and all of us at PARC respect her efforts greatly.



PARC: Please briefly describe your relevant experience prior to becoming the San Jose Independent Police Auditor.

TGD: To go in reverse chronological order, I had my own legal practice where I primarily did criminal law. I represented hundreds of clients on everything from misdemeanors to death penalty cases. Prior to becoming a lawyer, I was a private investigator for about ten years doing primarily criminal defense, investigating about every cause of death you can imagine. Prior to that, I was a special agent—in fact, the first female special agent on the San Jose task

force—with the Drug Enforcement Administration and worked major cases involving the sales, transportation, and manufacturing of dangerous drugs and narcotics. And before that, I was working for the Morgan Hill, California, Police Department in the area of crime prevention.

PARC: *Why did you want to be the IPA?*

TGD: It was a new opportunity and challenge, personally and professionally. The concept of oversight was fairly new [in 1993], and this being a new office and the first time San Jose would be having civilian police oversight, I saw it as a tremendous opportunity to not only learn about the field but also use my varied experience to help establish the office. As an attorney, I was part of a panel overseeing discipline of attorneys, so I already saw accountability as an area that I firmly believed in. Also, after I left the Drug Enforcement Administration, I had a personal run-in with an officer that I felt was totally uncalled-for. After having been a special agent—carrying a gun and a badge—and then as a civilian experiencing an incident like that, I realized how helpless people feel when they are involved in a situation with someone who represents authority. That experience opened my eyes early on to the reality that there needs to be oversight—the more authority someone has, the more oversight there should be.

PARC: *What does the IPA do?*

TGD: We have five primary functions. The first is to intake a complaint, which starts the San Jose Police Department investigation process. Second is to monitor the investigation by reading in advance any police reports that are available, any information, any evidence, and then by attending the interview of any civilian witnesses and/or officers. Our third function is to audit the completed investigation before the officer or the complainant receives the disposition; at that point we're able to request additional investigation or clarification from the investigators. It's then when we agree or disagree with the outcome of the

investigation. There's an appeals process that the IPA can initiate if in the end it still disagrees with the police chief, and because we are a chartered city, the city manager (who appoints the chief of police) oversees the appeals process and makes the final determination. The incentive for this appeals process is that unsatisfied complainants will take their grievances publicly to the city council. The city manager and I both report directly to the mayor and the city council. Fourth, we do analyses of our audits, which serve as the foundation for recommendations that we make. We've made in excess of 100 recommendations since 1993. Not only do we make these recommendations, but we help implement them. Finally, we do community outreach to inform the public of its right to file complaints.

PARC: *What steps did you take to try to establish relationships based on trust with SJPD personnel when you first became the IPA?*

"I worked closely with all of the staff at SJPD Internal Affairs.... I was sensitive to the fact that it's human nature not to like to have people watching over your shoulder. Officers may not approve of what we do, but I can tell you that not one of them can ever claim that we were disrespectful to them."

TGD: I worked closely with all of the staff at SJPD Internal Affairs (IA). There was a

lot of face time, which served two purposes—to establish a relationship with them and to observe and get a hands-on knowledge of what they do, knowing that I was going to be in a position where my responsibility was to point out any deficiencies in their work. I was sensitive to the fact that it's human nature not to like to have people watching over your shoulder. Officers may not approve of what we do, but I can tell you that not one of them can ever claim that we were disrespectful to them.

I also made it a point not to surprise the Department with findings. I would give them plenty of time to look at what we had found and what we were going to recommend. While they didn't have editing rights, they would know in advance, and by the time recommendations hit the news, we were already looking at solutions together. That was really appreciated by the SJPD administration because it not only didn't embarrass them in public but also gave them an opportunity to start working on the solution. That's ultimately what we wanted anyway. That was

a tremendous incentive to have the Department look at issues and begin addressing them.

I made it a point to regularly meet with the chief—whichever chief it was—both formally and informally. Oftentimes, we would have pretty passionate exchanges, and I would leave angry. But a couple of days wouldn't go by before I would set up an informal meeting—you know, "let's go for breakfast or lunch"—and continue that relationship in which we would both passionately argue our points of view without our arguments becoming personal.

I'd go on ride-alongs and go to briefings. I also went to the Citizens' Police Academy. And I would go to the SJPD Police Academy to give a class to incoming officers. Lastly, we do a satisfaction survey of all of the subject officers involved in complaint investigations; it gives them an opportunity to let us know what they thought of the process, if they were treated with respect and courtesy, and what can be done to improve the process.

PARC: *How has the Office of the IPA changed since it first opened eleven years ago?*

"It's gone from 'over my dead body' from the perspective of the Department to where we are working collaboratively.... The focus has shifted from having to defend our right to exist to looking at issues that need to be addressed and working together towards the implementation of solutions."

TGD: It's gone from "over my dead body" from the perspective of the Department to where we are working collaboratively towards addressing issues. The focus has shifted from having to defend our right to exist to looking at issues that need to be addressed and working together towards the implementation of solutions. With some of my recommendations, I've gotten a call from the police administration saying, "Could you help us implement this?"

When I proposed that SJPD provide communication and interpersonal skills training to officers—an area in which few departments if any had specialized training—the Department said, "Can you help us shape the training?" I did, and I'm very proud of the fact that after San Jose put together the training, POST (California Commission on Peace Officer Standards and Training) adopted it, and now every officer in California must receive this kind of training every two

years. That's what you can achieve when you're no longer fighting over your right to do your job.

PARC: *What do you see as the advantages and disadvantages of San Jose's model of civilian oversight?*

TGD: The advantage is that our focus is much broader than a case-by-case review, even though we do this as well. We look more at structural changes than simply the finding of a case. We can actually go to the root of a problem and fix it. This model also allows us to address the implementation of our recommendations, because while everyone can recommend change, it can also sit on a shelf and never go anywhere. Because we have the opportunity to examine the implementation, we are able to truly have behavior modification in the process.

For example, we had recommended that every time an officer uses force, that it would be an affirmative duty for the supervisor to write an investigation report as to why the officer needed to use force—not simply focus on the suspect but on why the officer used force. The Department

adopted the recommendation and it became mandatory. However, the following year, we looked at all of those complaints alleging excessive force, and we started to do an audit of how many supervisors were following the new mandate. We found that less than 50 percent were complying. We printed that, and we had the names of supervisors who had not followed through. Well, that got out, and when we repeated the same analysis the next year, 99 percent of the supervisors were complying. When officers know there is this possibility that their work can be examined in that specificity, and who is and is not complying can be identified, it's going to have the desired results.

One disadvantage is that the way we're set up to ask the questions of the officers is difficult, because we must give our questions to the IA investigators, who do the asking. I feel that oftentimes investigators don't ask the foundational questions; they just go directly

to the main question. Oftentimes, what we're looking for is going to be in the details and not in the \$60,000 questions. On the other hand, this does make a difference as far as how officers answer and their whole attitude about being candid when it's not us asking the questions. That's why I've left this alone, because it makes a difference for both the subject officer and for the investigator when that officer starts to not be forthcoming with answers. The sergeant who's asking the question doesn't take it too kindly that he has an officer trying to pull the wool over his eyes. If I were asking the questions, they'd be ready to be evasive and non-responsive. Also, if they were not truthful in a question that I asked, there'd be no penalty—at least on the books—for not being truthful to the auditor. But that is insubordination that can lead to termination if it's within the direct chain of command. So there are benefits, but it is frustrating.

The other disadvantage is that we don't have investigative authority which for some exceptional cases would be good to have. I don't believe that we should be the lead investigative agency, because I know that investigations are all-time consuming—they take as much time as you can give them. If we were to do that, it would be at the expense of the other work we do. I truly believe that if I were to compare the training, resources, and skills that civilians like us have, versus what those officers at IA have, there's no question that their skills, training, and resources are superior.

The real challenge is in controlling their biases that they bring to the job. That is an area on which we focus by doing satisfaction surveys, listening to the taped interviews, and conducting random audits of how they are interviewing and treating the public. We examine closely their finished product to see if their reports are conclusory or if they substantiate any assertions. By doing that, we are having an influence on the quality of the investigation without it tying up all of our time.

PARC: *If you could make changes to improve the IPA's effectiveness, what would you do?*

TGD: I believe our office should be present at, or at least monitoring the live interviews of subject officers involved in police shootings. We are not allowed to be present. We look at them after-the-fact. It's something that other cities are able to do; however, we have experienced tremendous resistance here from the police union. Because it is the most serious use of force, it merits having greater scrutiny. I would like to see greater involvement by our office early on in the investigation of police shootings in order to have greater accountability.

PARC: *Have you found ways to increase the likelihood that the Police Department will accept and implement your recommendations?*

TGD: We track our recommendations. On each one, the Police Department has to provide a response. We have about a 90-percent adoption rate. We track subsequent complaints that allege violations of policies addressed in our recommendations so that not only do we track whether the recommendations were adopted but also if they're making a difference in officer behavior. Take, for example, the issue of officers refusing to provide identification

"On each [recommendation] the Police Department has to provide a response.... We track subsequent complaints that allege violations of policies addressed in our recommendations so that not only do we track whether the recommendations were adopted but also if they're making a difference in officer behavior."

(name and badge number) to citizens. The chief, at the time the issue emerged, was reluctant to issue a mandate. I recommended that the SJPD give the officers business cards that they could hand to complainants or to any citizen who asked. I found that in some use-of-force cases, it was at the point when communications broke down that eventually led to going hands-on, an arrest, or someone getting hurt. And an officer's refusal to identify himself was what triggered the exchange, hostility, and anger. The chief didn't want to follow the recommendation even though it was already in the books that officers had to identify themselves. We tracked complaints five years in a row that alleged that an officer had refused to provide identification. In these complaints, IA would handle the complaint by referring complainants for

conciliation with the officer's supervisor. When these types of complaints continued to be filed, conciliation was removed as an option. Finally in the fifth year we made it known that we were going to make an issue out of every case where SJPD didn't thoroughly investigate and depending on the evidence, sustain the allegation. We felt that only that way were they going to get serious about this recommendation, and sure enough they did.

PARC: *Your 2003 Year-End Report showed "unnecessary force" allegations steadily decreasing to their lowest number since the IPA's Office opened. Do you believe your Office has had any role in the drop?*

TGD: Yes, I believe we have, for two reasons. One, we were shining the light on this issue, and so it brought use-of-force complaints to the forefront. It became one of our primary focuses. And two, there was greater transparency on how these cases came about by the fact that we were tracking and reporting everything from the degree of force to the type and location of injuries to what was used to inflict injuries. By breaking use-of-force complaints down, we were able to look at whether blows were in areas where officers were trained to strike or in prohibited areas such as the head. We reported this information in a manner that was useful in identifying particular problem areas and assisted the training unit in restructuring its training.

We don't have definitive evidence to say that these were the only two reasons, but I would feel comfortable saying that they were definitely factors in the drop in unnecessary force allegations.

PARC: *You also mentioned in that report that public awareness of your office has increased. What have you and your staff done to increase public awareness of the IPA? How does that awareness help you do your job?*

TGD: We've done many things, from having a really comprehensive web site that includes an eight minute video about our office from the perspective of the

police, community, and the IPA, to collecting data from satisfaction surveys of complainants and subject officers, to finding out more about who are the people we serve. When we make presentations, we survey people to see what their awareness was of our office and whether they are better informed after hearing our presentation. We publish our reports not only in hardcover but now also on CD-ROMs that are easy to use. We also wrote a youth guide. It was the first time this police department ever did a publication on youth and police practices. We had that youth guide translated into three languages and distributed throughout the schools. We also do public service announcements, and we have an advisory board that helps act as our eyes and ears out in the community. Finally, I've got one full-time staff member dedicated to public awareness/community outreach.

As far as how that awareness helps us do our job, it helps us build relationships with the community and its leaders, so that when issues arise, they do not get out of control.

"As far as how [public] awareness helps us do our job, it helps us build relationships with the community and its leaders, so that when issues arise, [situations] do not get out of control.... Awareness has materialized in support for our office and in the ability to maintain our current resources."

When I began to look at the dynamics of grassroots organizing, I realized that people look to that leader who's willing to go public, to mobilize people to take on an issue. By identifying who

those key people are and spending the time informing them how we do our job and what limitations we have, we are able to go to them when issues arise and say, "Sit down with us. Let us explain to you why this is happening." They have much greater credibility with the people who come to them than we do. Oftentimes, there are recommendations we know are going to get a lot of resistance from the police, but by having these relationships with key people, these community leaders are willing to come into the city council meetings and say, "We support the police auditor, and we support this recommendation." And the city council listens.

Awareness has materialized in support for our office and in the ability to maintain our current resources. I think recognizing early on the importance of public outreach and the facilitation of community forums where people are allowed to express their emotions

and concerns has helped us to build public confidence and communication with people who have a contrary view and at times accuse us of being a toothless watchdog. It is not easy to sit through public meetings where people come to vent their frustrations, but not to hear from the public would pose a greater threat to police oversight because it could send a message to police departments or elected officials that there is no longer a need for oversight.

PARC: *You mentioned the IPA Advisory Committee. What is the interaction among the IPA, the Advisory Committee, and the public?*

TGD: We created the Advisory Committee two or three years after the IPA Office was implemented. I realized that there was a void between our office and the community because everything we do here is so confidential, so outside the public view. There weren't enough people in the community who had a true understanding of how we function. We realized we needed people informed out in the community, and so I called on key community leaders who have a constituency of their own and brought them together.

They talked about what they wanted to be, what they wanted to do, and out of that came a mission and some guidelines. This group is comprised of

"It is not easy to sit through public meetings where people come to vent their frustrations, but not to hear from the public would pose a greater threat to police oversight because it could send a message to police departments or elected officials that there is no longer a need for oversight."

volunteers and is not sanctioned by the city council, which is good because the council doesn't have a say about who is on the committee, nor do we have to follow the rules under the Brown Act (a California law addressing public access to meetings of multi-member public bodies).

I meet with the committee two or three times a year, and before we make our recommendations, I meet with them to find out about the issues in their communities. Our city has a majority of minorities; it's such a diverse community that we need people from different areas telling us what their concerns are. The committee also helps us with community outreach and going to the mayor and city council and fighting against IPA budget cuts.

PARC: *What you have done to make your reports accessible to the public? What have you done in general to increase public confidence in the IPA's Office?*

TGD: I see confidence and awareness as difficult to separate. How I believe we have built confidence is by being visible in the community, by being responsive to emerging issues, and by making the work that we do more transparent. We put a lot of effort into preparing our reports so that the lay person can understand them. Our audience is primarily the public, though the reports also serve as internal documents since they help record agreements and progress we've made so that we don't have to reinvent the wheel with each incoming chief.

Going back to the issue of confidence, the only example I can give where there is some real, concrete evidence of confidence in our office is that we were not a chartered office until 1997. From 1993 to 1997, I was an independent contractor and our office could have easily been abolished by the city council. But in November 1996, the issue was placed on the ballot, and people voted in all ten council districts by 65 to

70 percent, and more, to make this office a chartered office, to make my position one with four-year, renewable terms, and to require ten of the eleven council members' support in order to fire me. I think it was a clear

mandate that people wanted this office and wanted it to be permanent.

PARC: *Do you have any concerns with the Department's deployment of Tasers and other less-lethal weapons in the past few years? Has the deployment had an effect on your complaint and audit processes?*

TGD: I do have concerns and am in the process of doing a study on the deployment of Tasers as they relate to either equipment failure or human error, primarily because the last two officer-involved shootings that resulted in the death of a citizen were cases where Tasers were deployed. These last two cases have resulted in us wanting to do a further study on why the Tasers didn't work. The chief has agreed to

provide the raw data they have collected in the last six months since SJPD first equipped every officer on patrol with a Taser gun

PARC: *How have different SJPD command staffs affected your work?*

TGD: Our work is affected in both good and bad ways every time there is a change in command staff. The attitude of the first chief I worked with started as “over my dead body.” The second chief was very supportive. And Rob Davis, who is the new chief, was then a sergeant working at Internal Affairs and is very familiar with our office. Our longevity has helped us become institutionalized so that oftentimes on some matters, we’re the authority. It has been good from that perspective.

It has been a greater challenge adjusting to the changes in command at Internal Affairs. In the 11 years I’ve been here, there have been ten IA commanders. If there would have been someone in command at IA who had been there as long as I have, I think we would have been much further ahead because of better continuity. However, aside from continuity, we have had a very good working relationship with the IA Unit and its commanders. They, better than any other police unit, understand the challenges that are inherent in police oversight.

PARC: *Do you have any advice for other police auditors and civilian oversight professionals on how they might more effectively work with departments and communities to resolve complaints and make policing more publicly accountable?*

TGD: My advice to other oversight practitioners is not to approach their duties from an adversarial perspective. As the Independent Police Auditor, the greatest power I have is the power of persuasion. I look for ways to make the Department feel that there is a win-win situation in every recommendation we make. I have also come to appreciate compromise because I think it’s an important first step towards

change. Police departments are agencies that are resistant to change. Police officers are suspicious of civilian oversight and are hypersensitive to criticism from civilians about how they should do their work.

I have found that there are two speeds that are dangerous for civilian oversight offices— very fast and very slow. To push for too much change in a very short period of time can be counterproductive and can alienate the police. And to not make changes and give a department the impression that you’re going to be rubberstamping its usual way of doing business is also dangerous because then you set a precedent that is difficult to break.

I can’t overemphasize the importance of establishing relationships. It really is about building relationships with the police department, community, elected officials, and media. As much as we would like to

“My advice to other oversight practitioners is not to approach their duties from an adversarial perspective. As the Independent Police Auditor, the greatest power I have is the power of persuasion. I look for ways to make the Department feel that there is a win-win situation in every recommendation we make.”

think that we can stay out of the politics, we cannot if we work for elected officials and in a field where the people we are providing oversight to are very political— I’m talking about the police unions. You

can’t close your eyes to the fact that you live, work, and operate in a very political world.

Oversight practitioners should develop networks in communities that are interested in civil rights, in the business community, and among mainstream groups. When it comes to tapping support, elected officials may dismiss people who are usually the ones demonstrating and are what some would call the usual disturbers, activists, and agitators. While they may be natural alliances, your support base must be diverse, so that when people come to support you, elected officials are looking at a cross section of the community they represent.

You must also develop thick skin. There were days when I felt there was nobody supporting my recommendations. Be willing to take your licks and then move on. Don’t take rejection personal. If there is a critical issue on which you are getting much opposition, examine the timing and circumstances and

determine if it is best to wait and reintroduce it at a later time. When making findings and recommendations, you need to be well prepared before doing battle. Always be looking for the latest studies, breakthroughs, and information to support your issues because this is a new field where, other than NACOLE (National Association for Civilian Oversight of Law Enforcement), there's really nowhere to go. Where do people in this field go for training? Where do they go for continuing education? People in this field have to be self-starters and have to be motivated to increasing their knowledge and expertise in this field.

PARC: *How have you seen the field of oversight change in your numerous years as a civilian oversight professional?*

TGD: I have seen the field of civilian oversight of law enforcement evolve from a strictly voluntary, grassroots effort to a profession where there are the beginnings of some minimum standards. Offices are moving towards paid staff, and the number of civilian oversight agencies is growing. When I started, there were maybe 50 or so cities that had some form of police oversight, and now there are hundreds. I think that there have also been great advances in the de-polarization of the field. When I look at the early NACOLE conferences, it was hard to find any police presence. I recall advocating for having some panels that involved police chiefs and people in law enforcement. There was initially a lot of resistance, but now we can find panels presenting at the NACOLE Conferences that not only involve police chiefs but also police union representatives. I don't think the overriding sentiment of police oversight professionals is an "us-versus-them" attitude anymore.

I also think that police oversight has become much more accepting of different oversight models. When we formed our own organization in the Bay Area involving six or seven oversight agencies, I remember letting the other agencies know that I was going to

leave because the majority of them were bent on believing that if you weren't a review board, you weren't a legitimate form of oversight. At that time, not only was there resistance from the police, there was also resistance in our own field to accept an office like ours. Now there are a lot of cities that have gone to the auditor/monitor model. There has been a tremendous change in accepting that perhaps there are different ways of doing this job.

As a profession, we are also better organized, and I think NACOLE deserves a lot of the credit. There are now many sources of information, such as the many books and publications about this field that have been written. Professor Sam Walker from the University of Nebraska at Omaha has been one of the early authors in the field of police oversight and has been instrumental in the development of police oversight as a profession. The NACOLE email network has helped practitioners like me stay on top of what's going on in other cities across the country and internationally.

"I remember when our first recommendation became part of the police duty manual—I almost wanted to frame it. It was a moment in time where I remember thinking, 'This is why we exist.' To have something tangible in my hands that I could touch and that I knew would make a difference, validated our work...."

PARC: *Which accomplishments as Independent Police Auditor are you most proud of?*

TGD: From a broader perspective, I think I'm most proud of our involvement in

promoting police oversight as a profession, locally, nationally, and internationally. And I am very proud of the fact that there are eight to 10 cities that have used our office as a model in creating their own civilian oversight agencies.

Locally, I am very proud of the fact that we have set up a process by which the City of San Jose, the Police Department, and the community can have their grievances and complaints heard in a credible manner. I remember when our first recommendation became part of the police duty manual—I almost wanted to frame it. It was a moment in time where I remember thinking, "This is why we exist." To have something tangible in my hands that I could touch—feel—and that I knew would make a difference, validated our work, especially in the area of excessive force. But

I'm also proud of the things that are not as interesting, such as the changes in the infrastructure at Internal Affairs (IA). Investigations no longer take two and three years; they are timely and IA places greater emphasis on communicating with the complainants. Previously, the complainants would file complaints and never hear anything or even get a closing letter, much less a regular update.

There are other areas I'm proud of, such as the Police Department becoming more focused on issues such as courtesy. That may not sound very important, but when I look at the number of calls to which police respond year after year, it is approximately 500,000. Only three percent of those involve making an arrest. So 97 percent of the calls involve providing a service where officers are dispatched and interpersonal communication is important (*i.e.* cold burglaries, false calls, situations that don't involve a confrontation). And, of course, confrontations that don't result in an arrest also require good communication skills. I saw a need to balance the focus and training in order to improve the service to the 97 percent of the calls where officer safety was not the over-riding factor. San Jose police officers are now more visible, responsive, and courteous to the public. And I'm very proud of the fact that we've made changes in how police shootings are reviewed, because I don't think there's another subject that creates so much controversy, resistance, and outright hostility from officers and police unions. No matter how fair, objective, and respectful I am in performing my duties, I realize that because of the work I do, I will never be liked by the police union. On the other hand, being liked by the subjects of our oversight should never be our goal.

For more information about the Office of the San Jose Independent Police Auditor, please visit <http://www.sanjoseca.gov/ipa/home.html>.

SPECIAL DISCOUNT FOR PARC READERS

The Police Executive Research Forum (PERF) is offering PARC readers a special discount of 20% on any of the following publications:

And Justice for All: Understanding and Controlling Police Abuse of Force

Product number: 237 Price: \$29.95 plus S/H
William Geller and Hans Toch, eds., 1995,
(372 pp.)

Police use of force is one of the most difficult and painful issues both for citizens interested in police accountability and police departments seeking to forge partnerships with citizens. This collection of essays from leading experts addresses such topics as public opinion about police use of force, race-related issues, officer training, prevention strategies, lawsuits, resolution strategies that satisfy both citizens and police, and more.

Citizen Review Resource Manual

Product number: 802 Price: \$27.50 plus S/H
Samual Walker, 1995, (424 pp.)

As more and more jurisdictions, large and small, establish review committees of community members in an effort to hold the police accountable for their actions, it is crucial that police leaders and policymakers be familiar with the policies and procedures in place across the country. In the *Citizen Review Resource Manual*, author Samuel Walker provides an overview of citizen review, including a section of ordinances and statutes, executive and department orders, and other documents collected from more than 30 police departments nationwide.

Order publications by calling toll-free to 1.888.202.4563 or visit PERF's online store at www.policeforum.org and register as a guest to view other titles on use of force, community policing, and other topics, or to purchase publications online.

CONFERENCES

December 1-4, 2004 – Commission on Accreditation for Law Enforcement Agencies, 25th Anniversary Conference, Austin, TX. Online at <http://www.calea.org/>

December 2-4, 2004 – International Association of Court Officers and Services, 10th Annual Conference, Orlando, FL. Online at <http://64.176.202.219/IACOS/>

December 6-7, 2004 – National Criminal Justice Association, Southern Regional Conference: Best Practices Across the South, Williamsburg, VA. Online at http://www.ncja.org/ncja_southern_conf.html

December 6-8, 2004 – Americans For Effective Law Enforcement, Public Safety Discipline and Internal Investigations, Las Vegas, NV. Online at <http://www.aele.org/wkspdates.html>

December 13-15, 2004 – The Performance Institute, National Conference on Law Enforcement Diversity Recruiting, Miami, FL. Online at <http://www.performanceweb.org/ledc/1189/1189.htm>

February 17-19, 2005 – Western Society of Criminology, 32nd Annual Conference, Honolulu, HI. Online at <http://www.sonoma.edu/cja/wsc/wscmain.html>

March 14-19, 2005 – Academy of Criminal Justice Sciences, Annual Conference, Chicago, IL. Online at <http://www.acjs.org/>