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# 2024 Annual Report

Covering January 1 – December 31, 2024

Submitted: April 7, 2025

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Office of the Independent Police Auditor for the City of Petaluma

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## INTRODUCTION

Over the past three years communities nationwide have focused their attention on addressing a number of critical issues in policing, including race relations, community-oriented public safety, and police use of force. These communities have demanded action to address these issues and the well-documented racial disparities arising from prevailing police policies and practices.

This is the second annual report of the Petaluma Independent Police Auditor (“IPA”) covering its activities during the year 2024. The IPA’s first annual report covering 2023 was presented to the Petaluma City Council on March 18, 2024.<sup>1</sup>

The establishment of the IPA was a seminal step in ensuring best practices and increasing trust in the Petaluma Police Department (“PPD” or the “Department”). Since its inception the relationship between the Department and the IPA has been exceptional, with a mutual goal of fostering a philosophy of continuous improvement in the Department.

## BACKGROUND

As mentioned above, to address requests from community members and start these conversations locally, the City of Petaluma (the “City”) hosted a community engagement and listening forum followed by community-led listening sessions. The City then hired a professional facilitator, Tracey E. Webb of Tracey Elizabeth Webb Associates, and established an Ad Hoc Community Advisory Committee (AHCAC) to discuss race relations in Petaluma. The AHCAC was tasked with making recommendations to the City Council to help unify the community and identify and pursue opportunities for meaningful, positive change and advancement of inclusion both within Petaluma City government and throughout the broader community.

The AHCAC consisted of 28 representatives from various groups, including many representing the City’s Black, Indigenous, and people of color (BIPOC) communities. The Committee began meeting in April 2021 and met monthly through October of that year. Over six sessions, the AHCAC identified issues and brainstormed ideas to make Petaluma more inclusive and welcoming, and published its final recommendations in a report dated December 2, 2021.<sup>2</sup>

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<sup>1</sup> The IPA’s Annual reports can be found on the IPA’s website at <https://www.petalumapoliceauditor.org/reports>

<sup>2</sup> The full report, titled “City of Petaluma ADHOC Community Advisory Committee: Final Report on the ADHOC’s Work on Racism, “Otherism”, and Community Relations with the Police,” can be found at <https://cityofpetaluma.org/documents/ahcac-final-report/>.

In total, the Committee made 31 recommendations addressing four categories:

- Police and the Community
- Diversity in Schools
- Creation of Multicultural Center/Restorative Justice
- Diversity in City Hiring and Appointments

On December 13, 2021, Petaluma City Council reviewed and prioritized the AHCAC's recommendations to give staff specific items to analyze for budgetary, legal, and policy implications and to bring back to Council for consideration. These included:

- Study current staff capacity to support existing City Commissions, Committee, and Boards in consideration of establishing a Diversity, Equity, and Inclusion ("DEI") Commission
- Hire DEI consultant(s) and/or establish an Office of Diversity and Equity
- Provide information on options for civilian police oversight

On April 4, 2022, a group consisting of the Petaluma City Manager, the Chief of Police, the City Attorney, and the Director of Economic Development & Open Government presented the Mayor and City Council with a memorandum titled "Provide Direction for Implementation of the City Council's Priorities in Response to the Recommendations of the [AHCAC]," which discussed the City's capacity for implementing the AHCAC's recommendations.<sup>3</sup>

On May 2, 2022, the Council responded by issuing its top 10 Goals and Priorities, which included the "Implementation of Hybrid Police Oversight Model and Citywide Diversity, Equity, and Inclusion Efforts." The first project milestone related to police oversight was to develop and issue a Request for Proposal ("RFP") for a new position, the Independent Police Auditor (IPA), which would be responsible for reviewing and evaluating complaints against City police officers, examining local policing policy, and conducting assorted audits related to the operations and activities of the PPD.

The IPA would also play a key role in assisting the City with the planning and implementation of a new Public Safety Advisory Committee (PSAC), which would be made up of community members and would provide advice on how police-community relations can be strengthened. Additionally, the IPA would support the PSAC and community members by offering relevant training and addressing concerns related to police-community relations and policing policies and practices, and by providing informative annual reports and audits for the PSAC, including data

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<sup>3</sup> The memorandum can be found at  
[https://petaluma.granicus.com/MetaViewer.php?view\\_id=31&clip\\_id=3598&meta\\_id=522855](https://petaluma.granicus.com/MetaViewer.php?view_id=31&clip_id=3598&meta_id=522855).

and information on topics of interest to the group. The IPA and the PSAC would work closely together to ensure that community feedback is received and considered and that PPD policies and practices are developed and implemented to make policing more effective and accountable in the City of Petaluma.

After issuing a solicitation for candidates, the City Council selected IntegrAssure, led by Jeff Schlanger, to serve as the City's first Independent Police Auditor.

IntegrAssure officially assumed its role as IPA on April 19, 2023. We applaud the decision of the City to implement this form of oversight of its police department, not as a reaction to a specific critical incident, but rather through recognition that such oversight, when executed appropriately, holds significant benefits for the City. Moreover, we applaud the way in which the Petaluma Police Department has collaborated with the IPA, providing unfettered access to its systems and meaningfully engaging in discussions relative to the improvement of the Department.

## FOUNDATIONAL PHILOSOPHY OF THE INDEPENDENT POLICE AUDITOR

IntegrAssure embraces the notion that effective policing must be rooted in a philosophy of continuous improvement. IntegrAssure has Subject Matter Experts ("SMEs") drawn from various law-enforcement related fields including executives and rank-and-file staff from numerous large and small police agencies from California and across the country. We also have lawyers and legal experts, public policy makers, and academia - all bringing their individual expertise to the City of Petaluma. The team brings with it a belief, that for policing in America to be truly successful, the basic principles of policing as first enunciated by Sir Robert Peele must be honored:

*"The police are the public and the public are the police;" and*

*"The ability of police to perform their duties is dependent on public approval of police actions."*

A failure to abide by these and other principles has caused issues of public trust in cities throughout the nation. Distrust and adversarial relations with the community spawn a variety of harms that need to be addressed: Harm to the Community from criminal activity. Harm to the Community from poor police practices. And harm to police officers, the vast majority of whom want only to do the right thing and crave the guidance to do it in accordance with best policing practices.

The City of Petaluma, through the creation of the PSAC and the IPA, is addressing these issues, and with the creation of the IPA, the City has provided a mechanism of police oversight that brings us back to the Peelian principles to build public trust to create a healthy ecosystem of public safety, fairness, transparency, accountability, and officer wellness.

This ecosystem brings with it a relentless pursuit to make officers all they can and must be. As this happens, the Community feels better about its police department and the domino effect of positive change can begin; starting with better collaboration with the Community and greater crime reduction which makes officers feel better about themselves. This creates an environment that enhances officer safety and makes policing for the City of Petaluma a more appealing career choice, easing the burden of recruitment and hiring. At the same time the Petaluma Police Department will become a more attractive place to work and the City an even better place to live.

The goal of our oversight is to ensure that policies, training, operational integrity, and accountability all reflect best policing practices. Our approach to the oversight process is to be collaborative while maintaining our independence and objectivity. In that quest, we have been and will continue to work closely with the PPD and the City to ensure that best practices are employed in every aspect of policing.

#### LEADERSHIP CHANGE IN POLICE DEPARTMENT

In April 2024, the City of Petaluma appointed a new Chief of Police. Brian Miller, a well-respected veteran of the Petaluma Police Department who began his career in 2005 and served in each rank in the Department, including Deputy Chief of Police and Interim Chief was selected to serve as the new permanent Police Chief. We want to thank retired Chief Ken Savano for laying the remarkably strong foundation of the department and for expertly executing on the City's vision of civilian oversight.

#### ESTABLISHMENT OF THE PUBLIC SAFETY ADVISORY COMMITTEE

On May 6, 2024, the Petaluma City Council signed legislation establishing a Public Safety Advisory Committee (PSAC) *"...as an essential element of Petaluma's hybrid model for civilian police oversight, transparency and accountability and community engagement with Petaluma public safety programs and practices."*

Further, as described in the legislation, the PSAC's purpose is *"...intended to serve as an advisory body to the City Council and a community resource for the City of Petaluma in the formation of strategies, development of community policing concepts, increasing public awareness, and addressing police/community relations regarding the public safety of the entire community. The*

*PSAC is intended to provide a forum for discussions of community public safety concerns and to represent a broad spectrum of viewpoints.”<sup>4</sup>*

On July 24<sup>th</sup> the PSAC held its first meeting. Members of the Committee were selected following the normal process for the City’s boards and commissions. Interested community members applied through the City and the names of the qualified applicants were presented to the City Council for a vote. Those receiving a majority vote were appointed. This first appointment was unique in that the top three vote-getters received a four-year term and the remaining three got a two-year term. Additional meetings of the PSAC were held in August, September, October and November of 2024. As is described further below in “Assistance to the PSAC, 2024 Activities” during the PSAC meetings, the IPA participated by reporting on important and relevant topics and presented to the PSAC to provide its expertise and insight.

## THE IPA TEAM

The IPA team is led by Jeff Schlanger who is designated as the Independent Police Auditor, along with assistance by his deputy, Denise Lewis, and other members of the IntegrAssure team as needed. Mr. Schlanger’s experience in both the public and private sectors, bringing a process of continuous improvement, risk management, and integrity assurance. Additional information on IntegrAssure and Petaluma’s IPA team including individual biographies can be found at <https://www.petalumapoliceauditor.org>

## THE ROLE OF THE IPA

The role of the IPA is laid out in the City’s contract with IntegrAssure. The IPA’s role includes:

- Stakeholder Engagement
- Review complaint investigations undertaken by the police department, including both internal and citizen complaints to identify any trends and patterns and the department’s use of its early warning system
- Direct Receipt of Complaints
- Review of Critical Incidents including those that result in death or serious injury

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<sup>4</sup> Italicized verbiage taken from the Petaluma City Council Resolution establishing the PSAC which is included as Appendix A.

- Review of Uses of Force and Complaints, Pursuits and Collisions in connection with the Department's use of an Early Warning System ("EWS")
- Audits of Complaints and Discipline
- Audits of Policies and Training
- Development of a Mediation Program
- Audits of Background Investigations
- Interfacing with PSAC
- Public Reporting

Each of these aspects of the role of the IPA is detailed below.

## STAKEHOLDER ENGAGEMENT

Soon after being selected, the IPA team established collaborative relationships with stakeholders, including the City Manager's Office, the City Attorney's Office, and PPD. In July of 2024, the IPA attended the first PSAC meeting.

The IPA encourages open communication and collaboration through regular meetings with PPD leadership to discuss the IPA's assessments of particular incidents and complaint investigations, significant events and any pending requests for data. During these meetings, the IPA team presents their preliminary findings and concerns and commendations to PPD, discusses those concerns and commendations and, when required, collaboratively arrive at "Agreed Upon Courses of Action (AUCAs)" which the department executes to address the identified issues.

In addition to the regular meetings with PPD leadership, the IPA team also attends and participates in monthly PSAC meetings.

## 2024 ACTIVITIES

As noted above, the Public Safety Advisory Committee was commissioned during the current reporting period. The IPA attended all monthly meetings of the PSAC during 2024.

In addition, the IPA met with City leadership to share noteworthy results of our reviews and receive input on areas to which the city wanted the IPA to focus resources. On March 18, 2024 the IPA attended a City Council meeting to present our 2023 annual report.

We have continued to have open communication and collaboration through our regular meetings with PPD leadership to discuss the IPA's review of uses of force and pursuits, complaint investigations, significant events and any pending requests for data. During these meetings, the IPA team presented their preliminary findings and recommendations to PPD and listened to any

concerns expressed by the Department in response before agreeing on a course of action for that particular matter.

The IPA notes that during this annual reporting period, through the PPD leadership transition, both the City and PPD continued to demonstrate their willingness to cooperate and to fully support the IPA in the performance of its duties. It is clear to the IPA, that City and PPD leadership are committed to the goal of making every PPD officer, and the department as a whole, be all that it can and should be.

## ASSESSMENT OF INCIDENTS

### INTRODUCTION

In reviewing PPD incidents, the IPA utilizes its “operational integrity” assessment template for its assessments of uses of force and pursuit incidents to determine whether PPD officers complied with the operational, or functional aspects of the PPD’s policies. These assessments are conducted using a 360-degree review template (see Appendix B to this report) to determine if the actions of the officers on the street have “operational integrity” through effective and appropriate implementation of PPD’s policies and the training.

The 360-degree incident reviews serve as the basis of the IPA’s philosophy relative to police performance improvement: identify and correct small mistakes before they become larger and, whenever possible, correct them through coaching, mentoring, and training. This methodology provides the best early warning system, as performance issues are identified and corrected as they arise rather than waiting for multiple events to occur. Its main purpose is to make all officers the best that they can be and derivatively make the department all that it can be.

The IPA’s approach, using this method, is aimed at reviewing these incidents holistically, from all points of view including the constitutionality of the initial interaction between an officer and individual, conformance to all PPD policies, professionalism, internal communication both before and during the incident, communication with the subject, tactics utilized, pre-event planning, and supervision. This full-circle review can help determine if the theoretical framework detailed in PPD’s policies and training are effectively translated into positive results in day-to-day police operations.

### USES OF FORCE METRICS

In 2024, officers responded to a total of 58,351 calls for service down from 61,753 calls for service in 2023, a decrease of 5.5%. Out of those 58,351 calls for service, there were 4,240 police reports taken by officers, compared to 4,803 in 2023, a decrease of 11.7%.

In 2024, the Department made 1,693 arrests down from 2,058 arrests in 2023, a decrease of 17.7%. Arrests include felony and misdemeanor arrests and citations which are classified as arrests.

The 75 total uses or displays of force represents approximately 0.13% of total calls for service. This is a reduction from the 0.2% in 2023. Of the 75 total incidents, 48 incidents or 64% involved an actual application as opposed to show of force. Thus, less than 0.08% of calls for service resulted in an actual application of force, with force being utilized in approximately 2.83% of all arrests made by Petaluma Police Department officers. While a reportable use of force (as opposed to a display of force) is force beyond mere handcuffing of a passive individual, it is notable that the level of actual force used by PPD in 2024 was minimal with no serious injuries occurring as a result of any use of force.

The charts contained in Appendix C show the different types of force used broken down by ethnicity and whether the subject of the force used was a Petaluma resident or not. The last two charts show the origin of the call in each case in which there was a display or use of force, one showing the breakdown for all incidents and one showing the breakdown for incidents in which the display or use of force was against a resident.

Regarding the breakdown of Uses of Force by ethnicity, it is crucial to distinguish between disparities and biases. Disparities refer to the unequal distribution of uses of force across different ethnic groups, which can be observed by comparing the number of incidents for each racial or ethnic group. In other words, if whites are subject to uses of force at a number greater than that of other racial groups, that is a disparity. Disparities can also exist with regard to percentages of uses of force related to a particular racial group when compared to a benchmark of that racial group, such as census data. So, for example, if whites make up 10% of the population but account for 25% of the uses of force, that too would be a disparity. However, the presence of such disparities does not and cannot be interpreted as indicative of bias. Bias implies a prejudgment or unfair treatment based on race or ethnicity, which must be substantiated by evidence beyond mere statistical discrepancies.

The causes of disparities in police uses of force are likely multifaceted and complex, influenced by a range of socio-economic factors, community-police relationships, regional crime rates, and policing strategies. These factors can contribute to the observed statistical differences without necessarily reflecting any discriminatory practices or biases within the Petaluma Police Department. In order to understand any disparities fully, it would be imperative to conduct a thorough and contextual analysis of the data. Only through such detailed examination can effective strategies be formulated to address any underlying issues contributing to these disparities, whether they be systemic, procedural, or arising from broader societal challenges. It should be noted that the IPA in its 360-degree review of incidents is looking for any indications of biased policing. It has found none to date.

## ASSESSMENT OF USE OF FORCE INCIDENTS

More than any other characteristic, police officers are defined by their unique authority to use coercive force to induce compliance with the law and protect public safety. The advent of social media and the ubiquity of camera-enabled smartphones made police uses of force more visible than ever and helped promote adoption of body-worn cameras by police departments around the country, including Petaluma. Use of force encounters, more than any other police-community interaction, shape the public's perception of policing at large. Instances of excessive, abusive, and unjustifiable force can ignite outrage, especially if not appropriately addressed, while those uses of force seen as justifiable or necessary can reassure community members that their values align with those of the sworn officers that patrol their streets.

The IPA is tasked with conducting assessments of all PPD uses of force and their initial review by PPD to ensure that PPD officers are using their authority consistent with the law and established best practices, and that the initial review of such incidents by supervisors is appropriate. Among the questions to be considered by these reviews are not just whether force was legally justifiable, but whether force was necessary or advisable, and whether less forceful means could have been used to achieve a similar—or better—result.

As described above, the IPA utilizes its 360 Review template when assessing uses of force. In each assessment, the IPA reviews the supervisory review of the incident conducted by a first line supervisor of the involved officer as well as independently reviewing body worn camera footage of the incident and the police reports associated with the incident. The IPA assessment of the incident determines whether the incident comports with policy, procedures, and state and federal law, as well as determining whether the supervisory investigation was conducted appropriately and reached the right conclusions, not only with respect to whether the use of force was justified and within policy, but whether the action of the involved officers comported with best practice in a number of different areas.

The justifiability of police use of force is a critical aspect of ensuring accountability and maintaining public trust. While the specific requirements may vary based on the circumstances, the following general principles apply to the analysis of use of force:

1. **When Force Can Be Used:** The use of force by police officers must be objectively reasonable and must be limited to overcoming resistance to arrest or detention (including flight) or be in response to an imminent threat of physical harm to the involved officer(s) or others. Officers must be able to articulate the resistance posed by an individual to arrest or detain and the reasonableness of the degree of force used to overcome that resistance, or the reasonableness of the officer's belief in an imminent threat of physical harm. Specifically, in *Graham v. Connor*, the U.S. Supreme Court established a key legal

standard for evaluating the use of force by law enforcement officers under the Fourth Amendment. The case originated when Dethorne Graham, a diabetic experiencing a medical emergency, was detained by Officer M.S. Connor under suspicion of theft. During the stop, Graham was subjected to physical restraint, resulting in injuries. Graham later filed a lawsuit alleging excessive force. The Court ruled that claims of excessive force must be analyzed under the Fourth Amendment's "objective reasonableness" standard, considering factors such as the severity of the crime, whether the suspect poses an immediate threat, and if they are actively resisting arrest. This decision underscored that the reasonableness of force must be judged from the perspective of a reasonable officer on the scene, without the benefit of hindsight, and taking into account the rapidly evolving nature of such encounters.

2. **Reasonable Belief and Objectivity:** The officer's use of force must be based on a reasonable belief that such force is necessary under the circumstances as they appeared at that moment. Any assessment of the use of force should be made objectively, taking into account the information available to the officer at the time, rather than relying on hindsight.
3. **Proportional Response:** The level of force employed must be proportionate to the threat faced. Officers should use no more force than necessary to effectively address the situation. This principle emphasizes the importance of considering the severity of the threat, the potential for harm, and the availability of alternative, less-lethal options.
4. **Consideration of Alternatives / De-escalation:** Before resorting to force, officers should make reasonable efforts to de-escalate the situation whenever possible and employ non-violent means of resolving conflicts. This includes verbal commands, warnings, and the use of techniques aimed at calming the situation and minimizing the need for physical force.
5. **Continuous Evaluation:** Throughout any use of force, officers should continuously reassess the situation and adjust their tactics accordingly. If the threat diminishes or ceases, the use of force should likewise be de-escalated or discontinued.
6. **Reporting and Documentation:** Any use of force by police officers must be promptly reported, thoroughly documented, and subject to review. Clear and comprehensive reporting ensures transparency and enables comprehensive evaluation of the incident to determine whether the use of force was justifiable.

These requirements aim to strike a balance between the legitimate need for law enforcement officers to effect arrests and detentions and to protect themselves and others, while safeguarding the rights and safety of individuals they interact with. Adhering to these principles can help ensure that police use of force is justified, accountable, and aligned with the principles of constitutional policing.

## ASSESSMENT OF PURSUIT INCIDENTS

Pursuit analysis is a critical component of ensuring accountability and safety within modern policing. Pursuits, while sometimes necessary to apprehend suspects, pose significant risks to both law enforcement officers and the public. Pursuits can quickly escalate, leading to property damage, serious injury, or loss of life. By police departments thoroughly analyzing each pursuit, can evaluate whether proper protocols were followed, assess the decision-making process in real-time, and determine if alternative methods could have been employed to mitigate risk. Moreover, analyzing pursuits allows departments to assess the proportionality of the response relative to the severity of the crime, ensuring that the pursuit's justification aligns with department policies and best practices.

In-depth pursuit analysis also provides a platform for continuous improvement and training. Reviewing the circumstances leading up to a pursuit and its outcomes can help identify trends, such as which types of incidents most frequently result in pursuits or whether certain individuals or units are involved in a disproportionate number of these events. These insights are valuable for guiding future training initiatives, updating policies, and enhancing the department's overall approach to high-risk situations. In this way, regular pursuit analysis helps to ensure that police actions remain aligned with the goals of public safety and responsible law enforcement.

## 2024 ACTIVITIES: OVERVIEW OF ASSESSMENT OF INCIDENTS

The chart on the following page provides visual perspective as to the nature of the IPA's recommendations and the type of incident they are associated with.

<b>2024 Activities: Overview of Assessment of Incidents</b>				
<b>Type of Incident Assessed<sup>5</sup></b>	<b>Use of Force</b>	<b>Display of Force</b>	<b>Pursuits</b>	<b>Totals</b>
Total Number of Incidents Assessed	41	20	12	<b>73</b>
Number of Incidents Assessed that Resulted in Recommendation(s) <sup>6</sup>	26	13	9	<b>48</b>
<b>Type of Recommendation</b>				
SAFE Team Deployment	4	1	0	<b>5</b>
Use of Wrap and Transportation	3	0	0	<b>3</b>
Communication / De-escalation	4	3	1	<b>8</b>
Tactics/ Safety	5	5	3	<b>13</b>
BWC Activation or Buffering	6	5	1	<b>12</b>
Remedial Training on Policy or SOP	1	0	2	<b>3</b>
Review of Policy	2	0	2	<b>4</b>
<b>Total Recommendations</b>	<b>25</b>	<b>14</b>	<b>9</b>	<b>56</b>

Overall, the above recommendations made by the IPA during this period were designed to reinforce best practices, ensure officer safety, and enhance transparency and accountability. By addressing areas such as policy clarity, tactical operations, supervisory accountability, and

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<sup>5</sup> Several incidents involved both a use of force and a pursuit, or a complaint and a use of force. In this chart, when that occurred the incident was counted based on its initial occurrence, i.e., a use of force that resulted in a complaint was shown as a use of force only.

<sup>6</sup> Some incidents might result in multiple recommendations, and/or the same recommendation repeated over several incidents. Consequently, this chart is not meant to provide an exact incident-to-recommendation count. Recommendations are made as needed and bear no pre-determined alignment with the number of incidents reviewed. Any extrapolation or comparison between the number of recommendations and the number of cases would be misplaced.

documentation, the IPA and PPD continue to work collaboratively towards the shared goal of continuous improvement in policing practices.

## 2024 ACTIVITIES: OVERVIEW OF FINDINGS

In this second year of operation, we reviewed 41 uses of force (UOF), two of which also involved a pursuit. The IPA also reviewed 20 displays of force, one of which also involved a pursuit. Of the 41 UOF incidents reviewed, 26 incidents initiated some type of recommendation or Agreed Upon Course of Action (AUCA). Of the 20 displays of force, 13 resulted in an AUCA.

In addition to the UOFs and displays of force we reviewed, we reviewed 12 pursuits, two of which, as noted above, also involved the use of force, and another one that involved the display of force. Of the 12 pursuits reviewed, nine initiated some type of recommendation or AUCA.

Generally speaking, the IPA's reviews found that PPD officers were courteous and professional in their interactions with members of the public. Indeed, there were several extraordinary performances by officers in handling challenging and difficult circumstances that were noted by the IPA. However, there were also several incidents where certain tactics could have been better with potentially better outcomes, and several incidents where remedial training in certain aspects of constitutional policing was suggested. Our reviews include recommendations on how any given incident could have been handled better, or more specifically, whether in any given incident a different approach by officers could have potentially yielded a better outcome.

Our findings and recommendations from these reviews were shared with PPD leadership, and after lengthy and healthy discussions, in the end, there were no disagreements relative to those findings and recommendations. While there were no use of force incidents that the IPA found to be "out of policy" per se, there were several incidents where the IPA's findings and recommendations indicated a need to reenforce certain policies, and in some cases illustrated the need to revise and/or clarify PPD policies.

For each finding in this area of "continuous Improvement", together, the IPA team and the PPD executive staff develop "Agreed Upon Course of Action" on specific areas of remediation and the process therefor.

PPD leadership has expressed its commitment to remedial training, coaching and mentoring of officers and supervisors to ensure that the philosophy of continuous improvement becomes embedded in the agency. The IPA reviews are part of the process that helps to ensure that small issues are addressed at the first opportunity through a non-disciplinary remediation program, recognizing that in some cases discipline is, in fact, called for. PPD leadership expressed its

commitment to having supervisors include the question of what could have been done differently to potentially achieve a better outcome in their investigations.

## 2024 ACTIVITIES: RECOMMENDATIONS

### SAFE TEAM DEPLOYMENT

The S.A.F.E. (Specialized Assistance for Everyone) Program in Petaluma, California, is a forward-thinking initiative designed to provide specialized assistance for non-emergency situations involving mental health, homelessness, substance use, and other social challenges. It seeks to address these issues through a compassionate, community-focused approach that reduces reliance on law enforcement and prioritizes the well-being of individuals in crisis. By deploying trained professionals such as mental health clinicians and social workers, the program ensures that responses are tailored to the unique needs of each situation, fostering more effective and empathetic outcomes.

At the core of the program is its use of mobile crisis teams, which are equipped to provide immediate, on-the-spot assistance. These teams work to de-escalate crises, offer support, and connect individuals with vital resources, such as housing, healthcare, and counseling services. Operating independently of police, these teams create a non-threatening presence that encourages trust and cooperation from community members, particularly those who may be hesitant to seek help due to concerns about law enforcement involvement.

The S.A.F.E. Program operates around the clock to ensure that assistance is always available to those in need. This constant accessibility underscores Petaluma's commitment to community safety and equitable care. By addressing root causes rather than symptoms, the program not only provides immediate relief but also contributes to long-term solutions for complex social issues. It plays a critical role in diverting individuals away from emergency rooms and the criminal justice system, offering instead a pathway toward stability and recovery.

The S.A.F.E. Program collaborates closely with the Petaluma Police Department (PPD) to ensure that each call receives the most appropriate response based on the nature of the situation. For non-emergency incidents that do not involve a foreseeable potential for violence, such as mental health crises, substance use concerns, or homelessness-related issues, S.A.F.E.'s trained professionals handle these calls independently, allowing police resources to focus on law enforcement priorities. However, in situations where there is a potential for violence or an uncertain risk to safety, S.A.F.E. teams co-respond alongside PPD officers. This partnership ensures that while the police maintain situational control, if necessary, S.A.F.E. professionals can focus on de-escalation and providing specialized care. By working together, the program and the

department strike a balance between maintaining public safety and delivering compassionate, resource-driven support.

As shown in the chart, relative to five of the 73 incidents reviewed, the IPA recommended that the PPD consider whether the “SAFE” program was utilized to its fullest potential. In a few of the cases, the IPA noted that it might have been more advantageous to have the SAFE team be the primary contact with subject. Better communication between PPD and the SAFE team will serve to prevent such incidents in the future.

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#### USE OF WRAP DEVICE AND TRANSPORTATION

The WRAP device is a restraint system designed to securely immobilize uncooperative individuals while prioritizing their safety and the safety of officers and medical personnel. Often used in situations where a subject is combative, resistant, or at risk of harming themselves or others, the WRAP provides an alternative to traditional methods of restraint. The device consists of a combination of padded straps and a reinforced harness that immobilizes the individual's legs and torso in a seated position, significantly reducing their ability to struggle or cause harm while maintaining proper airflow and minimizing pressure on the chest.

By positioning the restrained individual upright, the WRAP reduces risks associated with positional asphyxia, a concern in prone restraint techniques. It allows for a controlled and efficient method of transport, particularly in high-stress situations where ensuring the safety of all involved parties is critical. That being said, the transportation of individuals in the WRAP needs to be carefully monitored.

Law enforcement agencies and medical professionals view the WRAP as an effective tool for incident management. Its purpose is to minimizing harm while maintaining control over volatile situations. By combining security with considerations for individual dignity and safety, the WRAP reflects evolving best practices in handling uncooperative individuals in a way that balances operational needs with humane treatment.

As shown in the chart on page 12 “2024 Activities - Overview of Assessments of Incidents”, relative to three of the 73 incidents reviewed, the IPA recommended that the PPD reconsider whether the WRAP device was the best choice to restrain the individual in that instance, and further, whether or not the department should transport an individual who is “Wrapped” in the back seat of a police vehicle, or if other means of transportation might be safer for all involved.<sup>7</sup>

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<sup>7</sup> Photos of the WRAP restraint device are contained in Appendix D.

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## COMMUNICATION / DE-ESCALATION

Effective communication is critical in potential use of force situations, as it can often determine whether an encounter escalates or de-escalates. Clear, calm, and deliberate communication helps establish authority while reducing tension, allowing officers to guide subjects toward compliance without resorting to physical measures. By actively listening and responding with empathy, officers demonstrate professionalism and respect, which can build trust even in contentious circumstances. When individuals understand the actions being taken and why those actions are necessary, they are more likely to cooperate, minimizing the need for force and enhancing the overall safety of everyone involved.

Communication also plays a key role in coordinating responses among officers and ensuring alignment in tactics. Providing clear directives and sharing situational awareness prevents misunderstandings and improves decision-making in dynamic environments. Furthermore, when communication focuses on de-escalation techniques, it not only reduces the likelihood of force being used but also upholds the principles of procedural justice. Maintaining open and respectful dialogue helps to preserve the dignity of those involved and supports public confidence in law enforcement's commitment to equitable and fair practices.

Transparency statements are an essential component of effective communication during arrests, ensuring that individuals are informed of what is happening and why. When officers clearly state their intention to arrest someone, provide the reason for the arrest, and explain the process when feasible, they enhance understanding and reduce the potential for confusion or resistance. This approach aligns with constitutional principles and procedural fairness, demonstrating respect for individual rights while maintaining public trust. Transparency statements also provide a foundation for accountability, as they articulate the rationale for actions taken and reinforce the legitimacy of law enforcement practices.

As shown in the “2024 Activities - Overview of Assessments of Incidents” chart on page 12, relative to 8 of the 73 incidents reviewed, the IPA and the PPD discussed and came to “Agreed Upon Course of Action” for certain of the involved officers with regard to communication issues. The broad category covers issues such as the timing of communication with subjects; the particular choice of words, techniques and strategies used to defuse potentially violent situations without using force; officers being transparent about the intention to detain and/or take individuals into custody; the use of profanity; and the use of language that lacked sensitivity.

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## TACTICS / SAFETY

Employing best practice tactics is crucial for ensuring the safety of both officers and civilians, particularly in situations involving heightened risk or potential for conflict. These tactics include the strategic deployment of less-lethal alternatives, such as tasers, pepper spray, or beanbag

rounds, to control individuals while minimizing harm. Less-lethal tools provide officers with options to de-escalate situations without resorting to deadly force, aligning with modern policing standards that prioritize the preservation of life. Additionally, best practices emphasize avoiding crossfire situations, where officers or bystanders could inadvertently be placed in harm's way. By maintaining clear lines of fire and ensuring proper positioning, officers enhance their ability to act effectively and reduce the risk of unintended injuries.

Incorporating these tactical considerations not only protects lives but also reinforces public trust by demonstrating a commitment to professionalism and proportionality in the use of force. When officers consistently employ best practices, including the strategic use of less-lethal options and an awareness of crossfire risks, they are better equipped to navigate complex and potentially volatile encounters. This approach supports both officer safety and community well-being, promoting transparency and accountability in law enforcement actions. Ultimately, adhering to these principles ensures that public safety is achieved without unnecessary escalation, maintaining fairness and upholding the dignity of all individuals involved.

As shown in the “2024 Activities - Overview of Assessments of Incidents” chart on page 12, relative to 13 of the 73 incidents reviewed, the IPA recommended that the PPD consider whether the use of different tactics in the particular scenarios, might have been safer for the involved officers and/or the subject and community, and may have resulted in a better outcome or potentially avoided the need to use force. Several of our recommendations were made in instances in which the display or deployment of less lethal weapons should have occurred in conjunction with the display of lethal force. This issue can be resolved through better communication amongst responding officers to ensure, when practical and appropriate, that at least one officer is designated as “less lethal”.

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#### BWC ACTIVATION OR BUFFERING

Adhering to Body-Worn Camera (“BWC”) policies is essential for ensuring transparency, accountability, and the accurate documentation of interactions between officers and the public. Prompt activation of the camera, as required by policy, is critical because it ensures that incidents are recorded in their entirety, capturing not just the escalation or resolution of an encounter but also the context and events leading up to it. This level of documentation provides an objective record that can be invaluable in evaluating officer conduct, resolving complaints, and supporting evidence in investigations or prosecutions. A failure to activate the camera promptly risks undermining the integrity of the incident review process, potentially eroding public trust and exposing officers or their departments to allegations of misconduct.

Failure to maintain a buffer, typically achieved by not having the camera operating in the appropriate mode before an incident, further compounds these risks. Most modern BWCs are

designed to include a pre-recording buffer, which captures crucial moments before the manual activation of the device. Without this buffer, the recording may miss critical context that could clarify an officer's actions, or the behavior of others involved. This gap in documentation can hinder accountability efforts and leave room for questions about whether important information was intentionally or inadvertently omitted. Adhering strictly to BWC policy, including maintaining the proper mode for capturing a buffer, not only supports the principles of transparency and justice but also protects officers by providing a clear and unbiased record of events.

As shown in the “2024 Activities - Overview of Assessments of Incidents” chart on page 12, relative to 12 of the 73 incidents reviewed, the IPA and the PPD discussed and came to “Agreed Upon Course of Action” regarding BWC policy violations, typically relating to late activation or buffering. Our recommendations and our Agreed Upon Course of Action usually involves counseling or warning the involved officers. We will continue to work with PPD to address BWC violations and hold officers accountable for repeated failures of compliance.

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#### REMEDIAL TRAINING ON POLICY OR SOP

Following policies or standard operating procedures (“SOPs”) is fundamental to ensuring consistency, accountability, and effectiveness in any professional setting. These guidelines are designed to provide a clear framework for decision-making and actions, promoting safety, fairness, and compliance with legal or organizational standards. Adherence to established policies reduces ambiguity, helping individuals navigate complex situations with confidence while minimizing the risk of errors or misconduct. Moreover, consistent compliance reinforces trust among stakeholders, whether they are colleagues, community members, or regulatory bodies, by demonstrating a commitment to professionalism and integrity. Deviating from policies can compromise safety, undermine accountability, and expose individuals or organizations to unnecessary risks, making strict adherence an essential component of operational success.

As shown in the chart, relative to three of the 73 incidents assessed, the IPA and the PPD discussed and came to “Agreed Upon Course of Action” (AUCA) for certain of the involved officers with regard to specific policy violations. The AUCA in these situations was to provide a review of relevant policies or procedures during briefings to all PPD patrol officers such as placing persons in a recovery position after the use of force, legal justification for detentions, and the use of ballistic shields.

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#### REVIEW OF POLICY

Reviews of incidents often highlight gaps, ambiguities, or unintended consequences within existing policies, underscoring the necessity for periodic policy evaluation and revision. By systematically analyzing incidents, particularly those involving outcomes or deviations from

expected standards, organizations can identify patterns or deficiencies that may not have been evident when the policies were initially drafted. These insights enable policymakers to address issues such as unclear language, unrealistic expectations, or evolving best practices that necessitate updates to ensure alignment with current needs and standards. Revisiting policies in light of incident reviews also demonstrates a commitment to continuous improvement, fostering organizational accountability and public trust by ensuring that policies remain relevant, effective, and supportive of both operational goals and ethical principles.

As shown in the chart, relative to four of the 73 incidents reviewed, the IPA and the PPD discussed and agreed to prioritize the joint review of the related policy. As described further in this report, several policies were reviewed as a result, specifically the Body Worn Camera (BWC) policy, the Pursuit policy, the Use of Force policy and policy on the use of the WRAP restraint device.

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## PURSUIT RECOMMENDATIONS

As noted above, vehicle pursuits present inherent dangers to officers, suspects, and the public, often resulting in severe injuries or fatalities. The decision to initiate a pursuit must be carefully weighed against the severity of the offense and the risks posed by continuing the chase. Pursuits for violent felonies or immediate threats to public safety may be justifiable, whereas those for minor infractions or non-violent crimes can create unnecessary hazards that outweigh the benefits of apprehension. Agencies must establish clear policies that balance the need for enforcement with the duty to protect lives, ensuring that pursuits are conducted only when the potential harm of allowing a suspect to escape outweighs the dangers posed by the pursuit itself. We have worked with the Department in revising the policy that sets the parameters for pursuits.

Once a pursuit is initiated, officers must adhere to strict safety protocols to minimize risk. Excessive speeds increase the likelihood of crashes, reducing the ability to react effectively to traffic conditions, pedestrians, or sudden movements by the fleeing vehicle. Additionally, officers must always wear seat belts, as failing to do so dramatically increases the chance of serious injury in the event of a collision. Clear communication with dispatch and coordinating units is critical for maintaining situational awareness, ensuring that supervisors can assess the evolving risks and call off pursuits when necessary. Officers should also avoid initiating pursuits alone without waiting for backup when feasible, as doing so increases the risk to both the pursuing officer and the community. Proper policies and ongoing training in pursuit tactics help ensure that law enforcement actions are not only effective but also prioritize public and officer safety at every stage of the encounter.

As shown in the “2024 Activities - Overview of Assessments of Incidents” chart above, there were a total of 9 recommendations in our pursuit assessments. These recommendations dealt with each of the areas noted in the prior paragraph.

## DETAILED ANALYSIS OF TOUR ACTIVITY (D.A.T.A.) AUDITS

The Detailed Analysis of Tour Activity (DATA) Audit is a key component of the IPA's approach to comprehensive oversight and accountability. Unlike on-going reviews that focus primarily on specific categories, specifically, use of force, pursuits, or complaints, the DATA Audit provides a broader, periodic examination of all incidents occurring within a defined timeframe. This audit ensures that every aspect of policing, from routine stops and calls for service, is conducted in alignment with departmental policies and best practices. By encompassing all types of incidents, the DATA Audit offers additional insight into how the department is operating, as well as a view of officer performance in other categories of regular police activities.

Through this periodic review, the DATA Audit helps identify instances of behavior and areas for improvement that may otherwise go unnoticed under our regular assessment regime. The goal is to assure that officers are consistently adhering to protocols across the full spectrum of their duties, not just in high-profile or critical incidents. This proactive approach allows for detection of potential policy violations, training gaps, or emerging trends that may warrant additional attention. The DATA Audit ultimately strengthens the department's commitment to transparency, accountability, and continuous improvement in policing practices across Petaluma.

### 2024 ACTIVITIES

During the current reporting period of 2024, the IPA conducted one DATA audit covering a two-day period of July 8 – July 9. The review identified a number of anomalies involving the failure to complete RIPA forms on a total of six incidents which required that form to be completed. The use of the forms is relatively new, and these incidents have been discussed with command staff and the issue of failure to complete the forms is being addressed.

Overall, officers were extremely professional in their contacts with members of the public, and in the execution of their duties. There was one incident, which has been discussed with command staff, regarding possible improvements in the actions of officers during a particular death investigation.

We will continue to conduct these DATA Audits in 2025 to identify trends and issues that need to be addressed.

## ASSESSMENT OF COMPLAINT INVESTIGATIONS AND DISCIPLINE

### INTRODUCTION

The IPA is charged with assessing all internal and external complaints regarding the conduct of PPD officers. The goal of the assessments is to ensure that the complaint investigations are complete, thorough, objective, and fair, and that they reach the right conclusions based on the facts and applicable policy. To the extent that any investigation is found to be deficient, the IPA would consult with the Chief of Police and, if necessary, the City Manager, to ensure that those deficiencies are corrected. In addition, with respect to each complaint that is assessed by the IPA, the IPA may make recommendations on broad issues of policy, training, and accountability, and other relevant issues uncovered through the review.

There are several ways complaints can be filed against members of PPD. Community members can file a complaint directly to PPD against any of its members, sworn or civilian, by reporting it in person at PPD headquarters, calling PPD, by directly contacting the IPA, and/or submitting an online complaint. Additionally, an internal complaint can be filed by any member of PPD against another member of PPD. Lastly, the Petaluma Chief of Police can direct that an internal investigation be conducted against any member(s) of PPD. PPD's internal policy (Policy #1020) governs the intake and the investigation process for all complaints made against any employees of PPD.

In brief, if the complaint involves less serious or minor allegations, including no allegation of prohibited harassment, then the subject employee's supervisor may attempt to resolve the complaint, provided that the investigation would not be jeopardized by that supervisor's involvement. More serious allegations are required to be investigated by the Department's Professional Standards Division (PSD). Additionally, City managers and supervisors, such as PPD supervisors, are also responsible for reporting potential violations of the City's Prevention of Workplace Harassment Policy to the Director of Human Resources.

There are four potential findings for a complaint: unfounded, exonerated, sustained, and not sustained. An unfounded complaint is one where the alleged acts are found to have not occurred or did not involve Department members. Complaints that are determined to be frivolous will fall within this classification. An exonerated complaint is one where the alleged act occurred but was justified, lawful, or otherwise proper. A sustained complaint is one where the actions of an accused officer were found to have violated the law, department policy, or both. The burden of proof in such cases is by a preponderance of the evidence meaning that a complaint will not be sustained unless, from an examination of all of the evidence in an investigation, it is more likely than not that the conduct complained of did in fact occur and violated policy.

## ASSESSMENT OF COMPLAINT INVESTIGATIONS

It has been the practice of the PPD to share incoming complaints of misconduct against its officers upon receipt, with the IPA during the regular meetings in order to keep the IPA updated through the progression of the investigation as well as the overall number and nature of complaints. Once PPD concludes its investigation and issues associated discipline, the entire case is forwarded to the IPA for review to determine the thoroughness, adequacy, and lack of bias of the investigation. To make a determination with respect to these benchmarks there are a number of different and specific areas that are evaluated for every case the IPA reviews. Some examples of the areas that are assessed for each review are whether all relevant witnesses are interviewed, the quality of witness interviews, inspection of all relevant evidence including the body-worn camera footage, and whether the investigation was conducted fairly. In addition to assessing whether the investigation was conducted appropriately, the IPA also assesses whether the investigation was properly documented and whether there was appropriate internal quality control with respect to the investigation and the report. Lastly, if there was discipline issued in the case, the IPA assesses whether the discipline was appropriate and fair. Deficiencies in any of these areas are noted and may lead to broader findings and recommendations. All investigations must be conducted under the Public Safety Officers Procedural Bill of Rights (POBR) (Government Code Section 3303)<sup>8</sup>.

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<sup>8</sup> The bill requires that the interview of an accused member be conducted during reasonable hours and preferably when the member is on-duty. If a member is interviewed when off-duty, then the member must be compensated. Unless waived by the member, the accused member shall be interviewed at PPD headquarters or another reasonable and appropriate place. There cannot be more than two interviewers who ask questions of an accused member. Prior to any interviews, the accused member must be informed of the nature of the investigation, and the name, rank, and command of the officer in charge of the investigation, any interviewing officers, and all other persons to be present during the interview. The interview must be for a reasonable period of time and the members' needs should be reasonably accommodated. The member cannot be subjected to any offensive or threatening language, or any promises, rewards, or other inducements to obtain answers. An accused member who refuses to answer any questions directly related to the investigation may be ordered to answer questions in the administrative investigation after being given a Lybarger advisement and may be subject to discipline for any continued failure to answer questions. No information or evidence administratively coerced from a member may be provided to anyone involved in a criminal investigation into the same allegations or to any prosecutor assigned to such an investigation. All interviews must be recorded, with a copy of the of the recorded interview provided to the accused member prior to any subsequent interview. An accused member has to the right to have an uninvolved representative present during the interview. Finally, an accused member cannot be asked or compelled to submit a polygraph examination. Cal. Gov. Code § 3307.

The IPA is also empowered to directly receive complaints from the community regarding the conduct of PPD officers. The IPA has established three different ways to receive complaints from the community. The first is through a multilingual public website ([www.petalumapoliceauditor.org](http://www.petalumapoliceauditor.org)) with information about the IPA and a form the community can use to submit any complaints about PPD directly to the IPA. The second is through an [mailto:email](mailto:policeauditor@cityofpetaluma.org) address (policeauditor@cityofpetaluma.org) that community members can use to directly submit a complaint to the IPA. In addition, the IPA has a phone number of (707-927-0727) for the members of the community to call to report any complaints. The IPA is also empowered to receive complaints that have been received by the City Manager’s Office.

## 2024 ACTIVITIES: OVERVIEW OF ASSESSMENT OF COMPLAINT INVESTIGATIONS

The chart on the following page provides visual perspective as to the nature of the IPA’s recommendations and the type of incident they are associated with.

2024 Activities: Overview of Complaint Investigations	
Type of Incident Assessed <sup>9</sup>	Complaints
Total Number of Incidents Assessed	47
Number of Incidents Assessed that Resulted in Recommendation(s) <sup>10</sup>	7
Type of Recommendation	
SAFE Team Deployment	1
Use of Wrap and Transportation	0
Communication / De-escalation	1
Tactics/ Safety	2
BWC Activation or Buffering	0
Remedial Training on Policy or SOP	4
Review of Policy	0
<b>Total Recommendations</b>	<b>8</b>

<sup>9</sup> Several incidents involved both a complaint and a use of force. When that occurred the incident was counted based on its initial occurrence, i.e., a use of force that resulted in a complaint was shown as a use of force only.

<sup>10</sup> Some incidents might result in multiple recommendations. Consequently, this chart is not meant to provide an exact incident-to-recommendation count.

As indicated in the above chart, the IPA reviewed a total of 47 complaint investigations, all of which were conducted under the auspices of the Professional Standards Division (PSD). With respect to those reviews, the IPA made nine recommendations related to seven investigations which were shared on an on-going basis with PPD leadership.

The IPA agreed with all of the dispositions of the allegations in the 47 investigations reviewed, and the nine recommendations made involved specific issues noted during the IPA review that needed to be addressed within the investigation such as the handling of property, clarity and completion of documentation, the deployment of the SAFE team. The IPA also noted any circumstances that might be beneficial based on the nature of the complaint such as conducting a briefing review on the relocation of the Siren button in the police vehicles.

During this annual period, the IPA received seven complaints directly from the community, either through the IPA email, voicemail and one additional complaint which was forwarded from the City Manager's Office. In each of these complaints the IPA conducted an initial preliminary review of the allegation to best understand the circumstances surrounding the complaint. In each instance, the IPA determined that forwarding the complaint to the Department for investigation was the appropriate course of action. The IPA agreed with the outcome of PPD's internal investigation in each case.<sup>11</sup>

## AUDIT OF POLICIES AND TRAINING AND BACKGROUND INVESTIGATIONS

Among the IPA's most important responsibilities is the assessment of internal policies and trainings of the PPD determining how those policies and trainings conform to, or depart from, established best practices. Although PPD policies and trainings span a broad array of subject areas—from patrol operations to departmental management—the policies assessed relate to areas of particular concern to Petaluma community members and officials.

These include those policies relating to stops, searches and seizures, pursuits, body-worn cameras, uses of force, and internal investigations and disciplinary procedures. These areas have been selected for assessment because they directly govern how PPD officers interact with community members when conducting investigations, enforcing laws, or responding to calls for service. Accordingly, they, more than others, determine how PPD officers perform their duties and how Petaluma residents, in turn, experience policing.

The goal of these assessments is to help officials and community members better understand which PPD policies and trainings already reflect current best practices, which need modification, and how the City can further improve PPD's accountability to Petaluma's residents.

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<sup>11</sup> Of the 47 complaints 43 were external (from the community), of which seven came directly to the IPA, and 4 were internal complaints.

## 2024 ACTIVITIES

### **POLICY**

With respect to policies, in 2024 the IPA reviewed and made recommendations and worked with PPD on revisions with respect to the following policies:

Vehicle Pursuits (Policy 314)

WRAP (Policy 306)

De-escalation and Use of Force (Policy 300)

Body Worn Camera (Policy 449)

### **TRAINING**

As for trainings, the IPA attended and observed PPD's defensive tactics training in part to better understand how officers are being trained with regard to uses of force, and to ensure best practices for training are being implemented. The IPA was impressed with the training content and delivery, as well as the participation of the students/officers. The IPA will periodically attend and/or assess training and training curriculum to ensure PPD officers are benefitting from the most current best practices in police training.

### **OTHER**

The IPA also conducted an onsite review and assessment of applicant background investigation packages including new hires, lateral hires and dispatchers. The IPA noted several areas of inconsistent formatting between the different investigators, which was brought to the attention of PPD for future improvements.

## REVIEW OF CRITICAL INCIDENTS

Critical incidents are defined to include all officer-involved shooting incidents, regardless of whether the person was injured; traffic collisions involving police officers that result in death or serious bodily injury to another person; uses of force resulting in death or serious bodily injury to another person; and all deaths of persons occurring while the deceased was in the custodial care of the police department. The IPA is charged with review of all officer-involved shooting incidents and all other critical incident investigations to determine if the investigation was complete, thorough, objective, and fair. Additionally, PPD is obligated to provide IPA with timely notification of all critical incidents to provide the IPA with the ability to observe the scene at the IPA's discretion.

PPD and the IPA established a mechanism for PPD to notify the IPA in a timely manner when a critical incident occurs.

## 2024 ACTIVITIES

There were no critical incidents during the reporting period.

## REVIEW OF RIPA DATA

The Racial and Identity Profiling Act (RIPA) assessment is aimed at ensuring compliance with state-mandated reporting requirements and promoting transparency in policing practices. Under RIPA, the PPD is required to collect and report data on stops, and after-stop actions with a focus on demographic factors such as race, ethnicity, and gender. This process is essential for fostering accountability and building public trust, as it provides a clear record of how law enforcement interactions occur across different segments of the population. The IPA review is not only a means of assuring that PPD complies with RIPA's requirements but also serves as a tool for highlighting patterns and trends in policing practices which may require further analysis and inquiry.

The IPA RIPA assessment provides a comprehensive presentation of the data in graphical format, allowing for an accessible visualization of the demographic breakdown of stops and after-stop actions conducted by PPD. These charts and graphs offer the public and department leadership a clear snapshot of the frequency of stops, the outcomes, and the demographic groups involved. Importantly, this review does not include an analysis of potential causes for racial, ethnic, or gender disparities observed within the data.<sup>12</sup> The intent is to provide a representation of the collected data, leaving further investigation and interpretation of any disparities for future discussion and policy considerations. During the October 2024 PSAC meeting, Dr. Lorie Fridell presented on the topic of “Interpreting Disparity Data” at the invitation from the PPD. Dr. Fridell is an associate professor in the Department of Criminology at the University of South Florida, is an expert in her field, and is known for her research on police, especially regarding bias policing.<sup>13</sup>

## 2024 ACTIVITIES

In 2024, California implemented significant changes to data collection requirements under the Racial and Identity Profiling Act (RIPA), expanding the scope and specificity of the data law enforcement agencies must report. These changes include additional fields related to the type of stop, perceived attributes of the individual stopped (such as race, gender identity, and disabilities), and detailed documentation of the reasons for stops and actions taken. Additionally, the revised standards emphasize community-based approaches to behavioral health crises and impose stricter limitations on data collection practices, particularly regarding field interview cards and database entries. As a result of these modifications, direct comparisons between 2023 and 2024 RIPA data are challenging. The expanded reporting categories and revised definitions

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<sup>12</sup> Academics measure disparities compared with benchmarked data. These benchmarks may include residential population data which is generally not thought to be an appropriate benchmark for determining whether disparities are indicative of biased policing. The analysis of RIPA data is beyond the IPA's scope of services and expertise. For more on this topic see, for example, [Aurora Police Enforcement Data Analysis](#) and sources cited therein.

<sup>13</sup> For more explanation on the difference between disparities and the question of bias, please view the video of Dr. Fridell's October 24, 2024 presentation to the PSAC at <https://petalumaca.new.swagit.com/videos/318576>

introduce variations in how stops and interactions are recorded, making year-over-year analysis less reliable without significant contextual adjustments. Despite the challenges posed, in March of 2025, the IPA reviewed PPD's 2024 RIPA data and compared to 2023 data which we have included in Appendix E in both graph and table format. The content of Appendix E was presented to the PSAC on March 26, 2025. It should be noted that the material presented represents a quantitative analysis of the aggregate data, whereas the IPA conducts qualitative assessments of various incidents through its 360 Degree reviews and its DATA audits, which are described elsewhere in this report. The IPA found no constitutional issues, but did find a concerning level of under-reporting which we are addressing and will continue to evaluate. Other than a reduced number of stops and fewer uses of force year-over-year, racial breakdowns in the data appear to remain relatively consistent. Moving forward, the 2024 changes to RIPA reporting requirements should provide a more comprehensive dataset, enhancing the ability to assess and address potential disparities in law enforcement practices.<sup>14</sup>

## INDEPENDENT INVESTIGATIONS AS ASSIGNED BY THE CITY MANAGER

The IPA may be called upon from time to time to perform independent investigations as the request of the City Manager.

### 2024 ACTIVITIES

During 2024, the City Manager did not request the IPA to conduct any special investigations.

## ASSISTANCE TO THE PSAC

The IPA serves as the law enforcement subject matter expert for the Public Safety Advisory Committee (PSAC). The Committee's function includes reviewing, discussing and providing comments regarding the IPA's annual report and providing comments on existing and recommended police policies. Another function is for the PSAC to review and provide comments on the Department's annual military equipment report and the City's military equipment use ordinance. The PSAC will also assist in the development and review of the Police Department's strategic plan goals and objectives; provide recommendations on Petaluma public safety programs and initiatives; assist in educating the Petaluma community about the PSAC function civilian public safety oversight; and issuing to the City Council and the community an annual public report on the PSAC's work.

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<sup>14</sup> It is important to note that RIPA data is based on officer perception relative to age, race/ethnicity and gender. Officers cannot use what is reported on an individual's driver's license to report that information. To the extent that any potential category of age, race/ethnicity and gender is not reflected on the graphs in Appendix E, then that category was not utilized at all during the applicable period. For more information on this topic click [here](#) for the applicable legislative code.

PSAC members are to receive training from the PPD, the IPA, the Human Resources Department, the City Attorney's Office, and others as appropriate, regarding the federal, state and local laws and regulations affecting the operation of municipal police services in California. The PSAC members are to receive public safety related information which may include current and proposed PPD policies, calls for service; summary information of assessments of the IPA.<sup>15</sup>

The PSAC meets on the fourth Wednesday of each month.

## 2024 ACTIVITIES

The PSAC had its first meeting in July of 2024 and held a total of five monthly meetings in 2024.<sup>16</sup> The IPA has been in attendance each month, and during its inaugural meeting the PSAC was provided with an overview of the IPA's role and the IPA's first Annual report, as well as a presentation from the City Attorney's Office on important topics such as which the Public Records Act, and Brown Act.

Beginning in January 2025 the IPA began providing the Committee with detailed (as opposed to general) monthly updates on the IPA's activities.

## CONCLUSION

During the second year of operation, additional important issues have been uncovered through the IPA's auditing and review processes with regard to specific incidents and department-wide policies and procedures. These identified matters resulted in recommendations and agreed upon action items, all of which have been accepted or are on schedule for further discussion and deliberation. These issues are clearly addressable through modifications made to policies and training and to coaching and mentoring of officers. The IPA is working with the City to ensure the timely implementation of these recommendations to keep the PPD on a path of continuous improvement.

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<sup>15</sup> As stated in the resolution, PSAC members do not have access to confidential information that is exempt from disclosure to members of the public pursuant to the California Public Records Act or other laws and/ or that if disclosed may endanger the safety of a witness or other person involved in an investigation, the successful completion of an investigation, or violate individual privacy rights, or be a basis of City liability, such as confidential law enforcement investigation information or police officer personnel records. The PSAC shall have no authority to employ any person or to supervise or direct City staff or to incur any expense or obligation without approval of the City Manager or City Council.

<sup>16</sup> The December 2024 meeting was skipped in December due to the holiday schedule.

## APPENDIX A - CITY COUNCIL RESOLUTION ESTABLISHING PSAC

Appendix Begins on Following Page

## Resolution No. 2024-048 N.C.S. of the City of Petaluma, California

### **RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PETALUMA ESTABLISHING A PUBLIC SAFETY ADVISORY COMMITTEE (PSAC) AS PART OF THE CITY'S EXPANSION OF CIVILIAN POLICE OVERSIGHT AND COMMUNITY ENGAGEMENT WITH PUBLIC SAFETY IN PETALUMA IN FURTHERANCE OF THE CITY'S COMMUNITY CONVERSATIONS AND RECOMMENDATIONS ON RACE RELATIONS AND PETALUMA CITY GOVERNMENT**

**WHEREAS**, the City of Petaluma established an Ad Hoc Community Advisory Committee (AHCAC), which consisted of 28 appointees from numerous community stakeholder groups, include education, public health, civil rights, and other stakeholder groups, with substantial representation from Petaluma black, indigenous and people of color (BIPOC) communities; and

**WHEREAS**, the AHCAC met from April 21, 2021 to October 19, 2021 in 6 facilitated meetings with City executive staff and on December 13, 2021 provided the City Council with 31 recommendations to improve public safety and promote diversity, equity, inclusion and belonging within the Petaluma community in general and within the City government and its Police Department in particular; and

**WHEREAS**, the recommendations from the AHCAC included the implementation of Independent Police Oversight and diversity, equity, inclusion and belonging efforts throughout City government, including in recruiting, hiring, training, retention, and advancement of City staff, and in all City programs and activities; and

**WHEREAS**, on May 2, 2022, the City Council identified the establishment of a hybrid model combining independent, professional public safety auditors and civilian public safety advice and oversight, including the creation of a community Public Safety Advisory body as one of the City Council's top priorities for achieving enhanced community safety, feelings of belonging and trust, transparency and public safety accountability; and

**WHEREAS**, the hybrid civilian oversight model adopted by the City Council will integrate the functions of the Office of the Independent Police Auditor (IPA) and a Public Safety Advisory Committee (PSAC) to ensure comprehensive civilian oversight, public safety transparency for the community and adherence to best practices within the Police Department; and

**WHEREAS**, the Public Safety Advisory Committee is intended to work closely with the Office of the Independent Police Auditor, the Police Department, the City Manager's Office, the City Attorney's Office, and other City departments to promote public trust, enhance City responsiveness and accountability, represent community values, provide advice and recommendations and also respond to City proposed initiatives related to public safety and police/community relations; and

**WHEREAS**, the Petaluma City Charter provides in section 55 that the City Council shall have the power to establish such commissions as shall be necessary for the effective accomplishment of municipal business, subject to such commissions including a City Council member as a commission member and term limits specified in section 55 of the City Charter, and

**WHEREAS**, the City Council has from time to time, pursuant to the City's general police and other powers established committees as subordinate bodies to the City Council and charged such bodies with providing advice and recommendations to the City Council regarding specified topics, and the Petaluma City Charter restrictions that apply to creation of City commissions do not apply to establishment of City committees or to the appointment of City committee members or their terms of office; and

**WHEREAS**, the proposed action is not a “project” under the California Environmental Quality Act (CEQA) in accordance with CEQA Guidelines Section 15378(b)(5) because establishing the PSAC is an organizational and administrative activity of the government that will not result in direct or indirect physical changes in the environment, and if this action were a “project” under CEQA it would be exempt in accordance with the “Commonsense Exemption” pursuant to Section 15061(b)(3) of the CEQA Guidelines because it can be seen with certainty that as an organizational and administrative activity of the government there is no possibility that the establishment of the PSAC will have the potential for causing a significant effect on the environment.

**NOW, THEREFORE, BE IT RESOLVED** by the City Council of the City of Petaluma as follows:

1. **Establishment.** A Public Safety Advisory Committee (PSAC) is hereby established as an essential element of Petaluma’s hybrid model for civilian police oversight, transparency and accountability and community engagement with Petaluma public safety programs and practices.
2. **Purpose.** The PSAC is intended to serve as an advisory body to the City Council and a community resource for the City of Petaluma in the formation of strategies, development of community policing concepts, increasing public awareness, and addressing police/community relations regarding the public safety of the entire community. The PSAC is intended to provide a forum for discussions of community public safety concerns and to represent a broad spectrum of viewpoints.
3. **Composition.** The PSAC shall consist of six community members, representing diverse interests and backgrounds, and one City Council member as a City Council liaison to the committee, for a total of seven seats on the PSAC. Ideal PSAC appointees will: be interested in engaging with and learning about public safety and policing in Petaluma and the legal and policy framework that govern Petaluma policing; meet the eligibility requirements in this paragraph; and be prepared to attend PSAC meetings and fulfill all the duties of PSAC members in accordance with Section 4 this resolution. Each member shall be either a resident of the City, having resided in the City not less than one year prior to the member’s appointment, or the owner of a business authorized to operate within the City in accordance with Petaluma Municipal Code Chapter 6.01 for not less than one year prior to the member’s appointment. To ensure the PSAC’s independence from the Petaluma Police Department, no current or former employee of the Petaluma Police Department, and no immediate family or household member (defined as the parent, spouse, domestic partner, sibling, child, or cohabitant), of a current or former employee of the Petaluma Police Department, may be appointed to or serve on the PSAC. Practicing attorneys who represent/or are members of firms or entities that represent individuals or entities that are parties to criminal or civil matters involving law enforcement agencies as a party or witness are ineligible to be appointed to or serve on the PSAC. Persons who have active, pending criminal proceedings, are on parole, probation, or post-community release supervision, or who have prior criminal convictions for violent felonies or other crimes involving moral turpitude are ineligible to be appointed to or serve on the PSAC. For purposes of eligibility to be appointed to or serve on the PSAC, “moral turpitude” shall have the same meaning as in California law, and includes “dishonesty,” “general readiness to do evil,” “bad character,” and “moral depravity.” (See, e.g., *People v. Bautista* (1990) 217.Cal.App.3d 1, 5.)
4. **Duties/Authority.** The PSAC and its members are charged with the following duties: reviewing, discussing and providing comments to the City Council regarding the IPA’s annual report; providing comments on existing and recommended police policies; reviewing and providing comments to the City Council on the Department’s annual military equipment report and the City’s military equipment use ordinance pursuant to AB-481; assisting in the development and review of the Police Department’s strategic plan goals and objectives; commenting and providing recommendations on Petaluma public safety programs and initiatives;

assisting in educating the community at large about Petaluma civilian public safety oversight and the function and role of the Petaluma Police Department, providing comments and recommendations regarding the community's need for police services as well as ensuring that appropriate public safety services are delivered for the community's benefit; and issuing to the City Council and the community an annual public report on the PSAC's work.


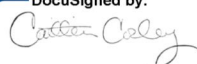
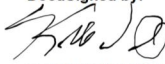
PSAC members will receive training from members of the Police Department, the IPA, the Human Resources Department, the City Attorney's Office, and others as appropriate, regarding the federal, state and local laws and regulations affecting the provision of municipal police services in California. City staff shall provide PSAC members public safety related information necessary for the fulfillment of their duties, including information on: current and proposed Petaluma Police Department policies, calls for police assistance; incidents involving the Petaluma Police Department; citizen complaints concerning the Police Department; and conclusions, recommendations and reports of the IPA. The PSAC members will not have access to confidential information that is exempt from disclosure to members of the public pursuant to the California Public Records Act or other laws and/or that if disclosed may endanger the safety of a witness or other person involved in an investigation, the successful completion of an investigation, or violate individual privacy rights, or be a basis of City liability, such as confidential law enforcement investigation information or police officer personnel records. The PSAC shall have no authority to employ any person or to supervise or direct City staff or to incur any expense or obligation without approval of the City Manager or City Council.

5. **Terms.** The terms of office of PSAC members shall commence upon their appointment taking effect and following their being sworn into office. Initial member terms will be staggered, with three members serving four years and three members serving two years. Following the initial PSAC terms and subsequently, each member's term shall be for four years. No PSAC member shall serve more than two, full, consecutive terms. The PSAC members' terms shall continue to be staggered such that the terms of no more than three PSAC members shall expire in any given year. The City Council PSAC liaison shall serve a one-year term. City Council PSAC liaison appointments will generally occur at the same time as other City Council liaison appointments, except that City Council PSAC liaison appointments may occur at other times as needed due to vacancy or otherwise. Notwithstanding the expiration of a PSAC member's term pursuant to this provision, and subject to provision 6, each PSAC member shall serve until a successor is appointed by the City Council.
6. **Resignation/Removal.** PSAC members may resign their seats at any time upon notice to the then PSAC chair. The City Council may declare the office of a PSAC member vacant: upon the resignation, death, or disability that results in the inability of a PSAC member to perform his/her duties; loss of residency or other status required for a PSAC member to be eligible to serve; or unexcused absence of a PSAC member from three consecutive regular meetings of the PSAC. The City Council may also remove any PSAC member without cause; however, removal without cause shall require the affirmative vote of at least four members of the City Council.
7. **Vacancies.** Upon the occurrence of a vacancy in a PSAC seat for any reason, the City Council shall, at a time convenient to the City Council, appoint a qualified person to fill the vacancy for the unexpired term.
8. **Meetings.** PSAC meetings shall be held monthly; provided that the PSAC may conclude that for part or all of the year, bi-monthly meetings are adequate for the PSAC to fulfill its duties in accordance with Section 4. PSAC meetings will generally not exceed ninety (90) minutes in length, and may be extended by up to fifteen (15) minutes in accordance with Section 9. PSAC meetings shall be subject to all applicable requirements of the Ralph M. Brown Act ("the Brown Act"), California Government Code Section 54950 *et seq*.
9. **Quorum/Action.** A majority of 4 PSAC members shall constitute a quorum for meeting and conducting PSAC business. All actions of the PSAC shall require the affirmative vote of a majority of the PSAC members present. Fewer than 4 members, or if no members are present, staff to the PSAC may adjourn meetings of

the PSAC in accordance with all applicable requirements of the Brown Act. A tie vote shall constitute no action on the motion, proposed action or recommendation.

10. **Organization.** At its first meeting, the PSAC shall organize by electing from the PSAC members a chair and vice-chair, who shall each hold office for one year. The chair, and in the absence of the chair, the vice-chair, shall preside over PSAC meetings.
11. **Staff.** The City’s Police Department and City Attorney’s Office shall provide PSAC staff and advise and support the PSAC as appropriate in the performance of its duties.

Under the power and authority conferred upon this Council by the Charter of said City.

<b>REFERENCE:</b>	I hereby certify the foregoing Resolution was introduced and adopted by the Council of the City of Petaluma at a Regular meeting on the 6 <sup>th</sup> day of May 2024, by the following vote:	Approved as to DocuSigned by:  5EF85AE94F3048D... City Attorney
<b>AYES:</b>	McDonnell, Barnacle, Cader Thompson, Nau, Pocekay, Shribbs	
<b>NOES:</b>	None	
<b>ABSENT:</b>	Healy	
<b>ABSTAIN:</b>	None	
<b>ATTEST:</b>	<div>DocuSigned by:  182689A429E4492... City Clerk</div>	<div>DocuSigned by:  FE316449A062476... Mayor</div>

## APPENDIX B – 360-DEGREE ASSESSMENT EXPLANATION AND TEMPLATE

Appendix Begins on Following Page



**IntegrAssure**

Independent Police Auditor for the City of Petaluma

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# ASSESSMENT CRITERIA FOR 360-DEGREE OPERATIONAL INTEGRITY INCIDENT REVIEWS

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June 2024

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## I. INTRODUCTION

This document describes the criteria that the IPA's team will use when conducting comprehensive 360-degree reviews of the Police Department (PD) and its various law enforcement activities, including uses of force, vehicle pursuits, complaints, stops and other community interactions.

The objective of the IPA's 360-degree incident reviews is to determine whether all law enforcement actions reviewed were conducted in compliance with legal standards, departmental policies and ethical guidelines in order to maintain accountability, transparency and trust in the PD's law enforcement practices. The 360-degree incident reviews serve as the basis of the IPA's philosophy relative to police performance improvement: identify and correct small mistakes before they become larger and, whenever possible, correct them through coaching, mentoring and training. This methodology provides the best early warning system, as performance issues are identified and corrected as they arise rather than waiting for multiple events to occur. Its main purpose is to make all officers the best that they can be, and derivatively make the department all that it can be.

The IPA notes that performance issues may not always be caused by police conduct issues. Policies, training, supervision and systems of accountability are vital components of continuous improvement and are separate tracks that the IPA has and will continue to assess in conjunction with the 360-degree incident reviews described herein.

The IPA reserves the right to update this document as needed to better reflect the approach to assessing operational integrity.

## II. THE IPA'S PHILOSOPHY OF COLLABORATIVE OVERSIGHT

The IPA firmly embraces a philosophy of collaborative oversight in its 360-degree incident review process. This approach is rooted in the principle that effective oversight should not be a punitive "gotcha" mechanism, but rather a constructive partnership aimed at continuous improvement. The IPA's goal is to work closely with command staff and other stakeholders, fostering an environment of open dialogue, mutual understanding and a shared commitment to excellence in law enforcement practices. Practical aspects of this approach include:

- Early feedback and communication
- Open dialogue on issues
- Joint determination of remediation
- Effective implementation of remediation
- Focus on learning and growth

### A. EARLY FEEDBACK AND COMMUNICATION

The IPA prioritizes providing feedback to the PD Command Staff at the earliest opportunity. This timely communication allows for immediate awareness and understanding of any issues or concerns identified during the 360-degree incident reviews.

### B. OPEN DIALOGUE ON ISSUES

By engaging in candid discussions about the issues uncovered, the IPA aims to create a space where insights are shared openly, and perspectives are broadened. This dialogue is crucial for a comprehensive understanding of the context and nuances surrounding each issue.

### C. AGREED UPON COURSE OF ACTION

The IPA believes in collaboratively discussing the extent of remediation necessary, arriving at an agreed upon course of action for remediation. While the IPA will provide preliminary recommendations to PD regarding any issues identified, the IPA plans to work together with PD Command Staff to evaluate the impact of any issues identified during the 360-degree incident review process and reach agreement on the most effective and appropriate course of action for remediation.

### D. EFFECTIVE IMPLEMENTATION OF REMEDIATION

The process of effecting remediation is a cooperative effort. the IPA will assist in developing strategies and actions that are both corrective and proactive in nature, and that the measures

taken are practical, sustainable, and aligned with the best practices in policing. The IPA will document agreed-upon remediations and will track the status of completion of such remediation.

#### E. FOCUS ON LEARNING AND GROWTH

The IPA's approach is underpinned by a commitment to learning and growth, with each 360-degree incident review being an opportunity for development and improvement, rather than merely a compliance check. Through this collaborative oversight approach, the IPA will work together with PD to strengthen its practices and policies, thereby enhancing its ability to serve and protect the community effectively. The IPA's role is not only to provide independent reviews, but also to be a facilitator of positive change, guiding and supporting PD in its journey towards excellence in policing.

### III. SCOPE OF REVIEW

The scope of the IPA's 360-degree incident reviews will encompass a broad range of activities:

- *Use of Force:* Assessment of instances where physical force or weapons were used by officers, evaluating their necessity, proportionality, and legality, consistent with PD policy. The IPA will also assess issues related to the duty to intervene; the duty to provide medical assistance; and the requirements relative to relief of involved officers.
- *Pursuits:* Analysis of vehicle pursuits to assess adherence to safety protocols, decision-making processes, and compliance with pursuit policies.
- *Complaints:* Assessment of complaints lodged against officers or the department to confirm whether a thorough investigation, fair adjudication, and appropriate response occurred.
- *Contacts:* Assessment of consensual encounters, stops, citations and arrests (traffic or pedestrian) to confirm whether the contact, and the reason(s) behind the contact, were consistent with the law; and assessment of the rationale and conduct of officers during these interactions for professionalism and compliance with department policy.

#### IV. THE IPA'S 360-DEGREE INCIDENT REVIEW PROCESS

The IPA's 360-degree incident review process is grounded in objectivity, thoroughness, and a commitment to best practices. It involves:

- A detailed examination of incident reports, body-worn camera footage, witness statements, and any other relevant documentation as well as review and assessment of supervisory reviews.
- Determining whether all actions by law enforcement personnel are legally justified, ethical, and within policy guidelines.
- Application of established legal standards and departmental policies as benchmarks for evaluation.
- Documenting the findings from each of the IPA's 360-degree incident reviews and recommendations relative to both individual officer performance and wider-reaching issues. For each of the areas assessed in the 360-degree incident reviews, the IPA will indicate whether there is an "Issue or Notable Observation" or not.

#### V. OUTCOMES AND RECOMMENDATIONS

The outcomes of the IPA's 360-degree incident reviews are aimed at:

- Identifying areas where officers have excelled in their duties and those areas where improvements are needed.
- Recommending specific remediation for particular officers involved in an incident.
- Recommending changes or enhancements in training, policies, and practices to prevent future occurrences of any identified issues.
- Strengthening community relations by demonstrating a commitment to accountability and excellence in policing.
- Examining the role of supervisory actions and review in order to understand how supervisors and command staff respond to and manage situations involving uses of force, pursuits, complaints, and stops.

## VI. COMMITMENT TO CONTINUOUS IMPROVEMENT

The IPA's 360-degree incident review process reflects its efforts to promote the PD's commitment to continuous improvement. Effective policing requires not only adherence to laws and policies but also responsiveness to the evolving needs and expectations of the community. Through these incident reviews, the IPA will require and assist the PD in its pursuit of upholding the highest standards of law enforcement and fostering a culture of integrity, respect, and professionalism. The philosophy of continuous improvement is a major focus in the discussion of each incident with PD in the context of determining whether anything could have reasonably been done differently to have potentially and reasonably achieved a better outcome.

## VII. THE IPA'S 360-DEGREE INCIDENT REVIEW CRITERIA (UOF)

The IPA's assessment criteria for its 360-degree incident reviews are detailed below.

### A. BODY WORN CAMERA UTILIZATION

Proper use of body-worn cameras (BWCs) ensures that a clear and comprehensive record of events is maintained, which is invaluable for post-incident reviews, investigations, and building community trust. The IPA's assessment of BWC utilizations is therefore integral to ensuring that the benefits of BWC technology are fully realized relating to enhanced policing standards and practices. Key considerations for the BWC utilization assessment include:

- *Activation Compliance:* Were BWCs activated at the start of an incident or encounter, in accordance with departmental policies?
- *Continuation of Recording:* Did BWCs remain active throughout the duration of the incident, ensuring continuous and uninterrupted recording?
- *Termination of Recording:* Was termination of the BWC recording appropriately timed to capture the entire incident?
- *Muting and Audio Considerations:* Were there any instances where audio was muted or disabled?

### B. PLANNING, INTERNAL COMMUNICATIONS AND DECISION-MAKING

Police actions at the inception and early stages of an incident often reflect the level of preparedness and situational awareness of the officers involved. Evaluating these actions offers insight into officers' readiness to handle unexpected situations and adherence to training and protocols. Specifically, reviewing these actions can reveal how well officers assess and manage risks before engaging in a situation. This includes understanding the environment, potential threats, and available resources, including appropriate communications with supervisors.

Similarly, the making of sound decisions based on sound judgment and intelligence is a crucial skill for an officer which needs to be evaluated. Key considerations for the assessment of planning, internal communications and decision-making include:

- *Pre-Incident Information Gathering:* Did the officers gather sufficient information before the incident, when available, indicating their effectiveness in understanding the situation they were about to engage in?
- *Planning:* Were plans of an appropriate quality developed, when possible?
- *Pre-Incident Decisions:* Were the decisions made by officers before or in the early stages of the incident of an appropriate quality, in light of the available information and circumstances?
- *Internal Communications:* Did the officers communicate appropriately with each other and their supervisor before and in the early stages of an incident?

#### C. LEGAL PREDICATE FOR CONTACT WITH SUBJECT

Intrusive law enforcement interactions must be predicated on reasonable suspicion, probable cause, or other legal justification, such as fulfilling a caretaker function. By assessing whether there is an appropriate legal basis for the interaction, officers demonstrate a commitment to upholding legal standards and protecting the rights of individuals. This can enhance public trust in law enforcement agencies by reassuring the community that officers are acting within the scope of their authority and respecting citizens' rights. Key considerations for the assessment of legal predicate for contact with subject include:

- *Encounter Permissible:* Was the level of the encounter supported by objectively reasonable facts from the perspective of the involved officer so as to make the encounter constitutionally permissible?
- *Consensual Encounter:* With respect to a consensual encounter, was the individual free to leave and not answer any questions?
- *Terry Stop Reasonable Suspicion:* With respect to a Terry Stop, did the officer have a specific, articulable, and reasonable suspicion, not a mere hunch, that the person is, or is about to be, or was involved in criminal activity? This suspicion must be supported by specific facts or observations.
- *Terry Stop Brief and Focused:* In the case of a Terry Stop, was the stop brief and focused on confirming or dispelling the officer's suspicion?
- *Arrest Probable Cause:* In the case of an arrest, was there probable cause to make the arrest?

#### D. COMMUNICATION WITH SUBJECT(S)

Communication plays a critical role in law enforcement interactions, especially in high-stress situations like those involving use of force. Effective communication can de-escalate tensions,

clarify intentions, and prevent misunderstandings, while poor communication can exacerbate a volatile situation. Key considerations for the assessment of officer communications with subject(s) include:

- *Clarity of Communication:* How clearly and effectively did the officer communicate with the subject? This includes the use of clear language, appropriate tone, and understandable instructions.
- *De-escalation Efforts:* Were attempts made by the officer to de-escalate the situation through verbal communication? This could include calming the subject, negotiating, or employing other crisis intervention techniques. It also includes active listening to understand the subject's concerns or state of mind, the use of empathetic and non-confrontational language, and the avoidance of language or gestures that could escalate tension.
- *Command Presence and Authority:* Did the officer balance assertiveness with respectfulness to maintain control of the situation without escalating tensions?
- *Use of Verbal Warnings:* Did the officer provide adequate verbal warnings or make the consequences of non-compliance clear to the subject?
- *Responsiveness to Subject's Communication:* Did the officer listen and respond appropriately to the subject's verbal and non-verbal cues?
- *Cultural and Linguistic Considerations:* Did the officer adapt their communication to accommodate any cultural or linguistic differences?

#### E. DE-ESCALATION

De-escalation is key to good policing, especially in situations where use of force is or may become involved. Even in non-use-of-force contacts with civilians, the level of an officer's de-escalation skills can affect the outcome of an encounter. Key considerations for the assessment of de-escalation include:

- *Verbal De-escalation:* Did officers use their verbal and non-verbal communication skills to de-escalate tension? This includes tone of voice, choice of words, and body language; providing clear and simple instructions or requests; actively listening in order to understand the subject's concerns or state of mind; acting empathetically and non-confrontationally; and avoiding the use of language or gestures that could escalate tension, such as profanity or aggressive demeanor.
- *Efforts to Slow Down or Stabilize the Situation:* Did tactical decisions slow the pace of the encounter, allowing more time for a peaceful resolution? This includes avoiding rushing or forcing a resolution unless immediate action is necessary for safety; and creating a controlled environment where both the officer and the subject have time to think and communicate.
- *Attempts to Understand and Empathize with the Subject:* Did the officer empathize with the subject, considering their emotional, mental, and situational state? Did the officer recognize

signs of mental illness, substance abuse, or emotional distress? Did the officer show compassion and understanding, which can help in gaining the subject's trust and cooperation?

- *Utilization of Space, Barriers, or Tactical Repositioning:* Did officers use physical space and positioning to reduce the immediacy of a threat and increase safety? This includes maintaining a safe distance to reduce perceived aggression, using barriers (like vehicles or furniture) as protection and to create a buffer zone and repositioning to avoid cornering or overwhelming the subject.
- *Decisions to Wait for Additional Resources or Specialized Units:* Did officers exercise appropriate judgment in deciding to wait for backup, specialized units, or crisis negotiators? Did the officers recognize when the situation was beyond their training or required specialized skills? Did the officers use the time before additional resources arrived to stabilize the situation as much as possible?

#### F. LEGAL JUSTIFICATION FOR USE OF FORCE

Assessing the legal justification for each use of force is a critical component of any comprehensive use of force review. This assessment determines whether force was used in compliance with legal standards, departmental policies, and ethical considerations. Key considerations for the assessment of legal justification for each use of force, include:

- *Alignment with Legal Standards:* Did the use of force comply with relevant legal standards, including constitutional guidelines and state law including §18-1-707 C.R.S.? Were each involved officer's actions objectively reasonable considering the circumstances, without the benefit of 20/20 hindsight? This means evaluating the situation from the perspective of a reasonable officer on the scene, rather than with the clarity often available after the fact, while considering: (1) the severity of the crime, if any; (2) any immediate threat to involved officers or others; and (3) whether the subject was actively resisting or evading arrest by flight.
- *Other Factors:* Were alternative methods of capture or restraint considered in light of other potentially relevant factors such as the number of suspects versus officers, and the size, age, and condition of the suspect versus the officers?
- *Consistency with PD Policies:* Did the use of force align with the specific policies and procedures of PD?
- *Proportionality:* Was the level of force used proportional to the threat presented and the subject's actions?
- *De-escalation:* Were de-escalation techniques properly employed?
- *Officer Training and Experience:* Did the officers' decision-making reflect the training and experience of the officer(s) involved?

- *Alternative Options:* Were other less intrusive options available that were not used?
- *Reporting and Supervisory Review:* Was the documentation of the use of force and the supervisory review thereof thorough, accurate and complete?

#### G. DUTY TO INTERVENE

The duty to intervene, as required by the law <sup>1</sup> and as trained on by PD in its participation in ABLE training, is a critical component of law enforcement accountability and ethics. It refers to the obligation of an officer to step in when they observe another officer engaging in excessive use of force or conduct that violates a person's rights, departmental policies, or laws. This duty is rooted in the principle of upholding justice, protecting civilians from harm, and maintaining the integrity of the law enforcement profession. The evaluation of this duty is essential to promote a culture of accountability and to assess whether all officers adhere to ethical standards and legal guidelines. Key considerations for the assessment regarding whether there was appropriate discharge of the duty to intervene, include:

- *Identifying the Need to Intervene:* Was there a clear and apparent need for an officer to intervene in the situation? The nature of the incident, the actions of the involved officers, and the level of force used are relevant to this assessment.
- *Officer's Response to the Situation:* Did officers at the scene respond in a timely and effective manner to any improper conduct? Did they take appropriate actions to prevent, stop, or report the misconduct?
- *Barriers to Intervention:* Were there any potential barriers that might have prevented an officer from intervening, such as hierarchical constraints, perceived peer pressure, or fear of retaliation?
- *Training and Policy Awareness:* Did the officers possess the knowledge and understanding of relevant policies and training regarding intervention duties? Did the situation reflect a need for enhanced training or clearer policies?
- *Reporting and Follow-up Actions:* Was the incident reported appropriately by the officers following the incident, in line with departmental policy? Were the actions taken by the PD upon receiving the report appropriate?

#### H. MEDICAL RESPONSE AFTER A USE OF FORCE

The provision of medical response after a use-of-force incident is a fundamental duty of law enforcement officers. It involves assessing the medical needs of individuals involved in the incident and assessing whether appropriate medical care was provided promptly. This duty reflects a commitment to preserving life and health, even in situations where force was necessary. Evaluating this aspect is crucial for assessing whether policies and practices prioritize

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<sup>1</sup> California Government Code §7286

the well-being and rights of all individuals, align with humanitarian principles, and comply with legal obligations. Key considerations for the assessment of medical response after a use of force include:

- *Timeliness of Medical Assessment and Response:* Did officers assess the need for medical assistance in a timely manner after the use of force, and did they promptly provide and/or call for medical aid?
- *Adequacy of Medical Care Provided:* Was the first aid or medical care provided by the officers adequate, if applicable, and was the care appropriate for the injuries or conditions observed?
- *Training and Knowledge:* Did the officers' actions reflect their training and knowledge regarding medical response and first aid?
- *Escalation to Medical Professionals:* Was the officers' decision-making timely and appropriate regarding when to escalate to medical professionals, such as calling an ambulance or EMT?
- *Documentation and Reporting:* Did the officers' documentation of the medical response accurately and thoroughly reflect the medical care provided and the condition of the individual?
- *Policy Adherence:* Were the officers' actions in compliance with departmental policies and protocols related to medical response after the use of force?
- *Consideration of Special Medical Needs:* Did officers consider and appropriately respond to any known special medical needs or conditions of the individual?

## I. RELIEF PROTOCOLS IN USE OF FORCE INCIDENTS

Relief protocols in use-of-force incidents typically mandate that an officer involved in a significant use of force should be relieved from direct contact with the subject at the earliest opportunity by an available officer. This protocol serves as post-force de-escalation of tension between a subject and officer involved in a use of force, allowing for decompression of the situation and the most professional handling of post-force police operations. Adhering to relief protocols is fundamental in assessing whether use-of-force incidents are managed with the utmost professionalism and consideration for all involved. Compliance with these protocols reflects the PD's commitment to responsible and ethical law enforcement practices. Key considerations for the assessment of relief protocol include:

- *Timeliness of Relief:* Was the involved officer promptly relieved following the use of force incident? If not, were any delays reasonable in light of the circumstances?
- *Implementation of Relief:* Was relief implemented in a manner that maintained the dignity and rights of the subject while ensuring the safety of all parties?

- *Documentation and Reporting:* Was documentation regarding the relief process in the incident report accurate and complete, especially regarding the timeliness and description of the relief action?
- *Policy Adherence:* Did relief actions taken comply with the PD's relief protocols and policies? If not, were any deviations from the protocol justified in light of the circumstances?

## J. CONSTITUTIONAL RIGHTS

The Constitution provides fundamental rights that must be respected in all law enforcement activities, and it serves as a safeguard against potential civil rights violation. Compliance with constitutional standards is paramount in upholding the rule of law in all encounters between police and the public, and in protecting the rights of individuals. It also reinforces the commitment of law enforcement agencies to ethical and lawful practices. Key considerations in the assessment of compliance with fundamental Constitutional rights include:

- *Frisk:* If the encounter involved a frisk, was the frisk legal and appropriate? Did the officers have reasonable suspicion to believe that the person was armed and dangerous, as required by Terry v. Ohio? Was such suspicion based on specific and articulable facts, not just a hunch? And was the frisk limited to a pat-down of the outer clothing for weapons?
- *Search:* If the encounter involved a search, was the search conducted in compliance with fourth amendment protections against unreasonable searches? Was there proper legal justification for the search, such as consent, a warrant, incident to arrest, inventory, or exigent circumstances? The warrantless search of a detained individual or his or her belongings is only permissible in the case of a detention if a legally permissible frisk has determined the presence of that which reasonably is felt to be a weapon.
- *Detention:* If the encounter involved a detention, was the detention legal and appropriate, based on reasonable suspicion or probable cause? Was the detention not unduly prolonged or unduly restrictive as to the place and condition to ensure the safety of officers or others and/or to prevent an escape or willful refusal to comply with an order of detention?
- *Handcuffing:* If the encounter involved the use of handcuffs or other restraints, was their use reasonable and necessary under the circumstances, and did the use of such restraint not constitute excessive or punitive restraint? Handcuffing is generally associated with an arrest, which requires probable cause to believe that the person has committed a crime. Officers may also use handcuffs during a Terry Stop for safety reasons if they reasonably believe that their safety, or that of others, is at risk, or that the detainee is a flight risk. This must be justified by specific circumstances suggesting the individual may be armed, dangerous, or a flight risk. The use of handcuffs during a stop does not automatically turn the encounter into an arrest, but it does increase the level of scrutiny regarding the lawfulness of the police action.
- *Arrests:* If the encounter involved an arrest, was the arrest legally made, supported by probable cause and conducted in accordance with legal procedures?

- *Miranda Warnings:* If the encounter involved a Miranda warning, was it properly administered, and were suspects informed of their rights before any custodial interrogation, as mandated by the *Miranda v. Arizona* decision?
- *Protected Class Bias:* Was the encounter conducted in an unbiased manner in whole and in part, without any indication of protected class bias affecting the officer's enforcement actions? Protected class bias refers to bias based on race, ethnicity, gender, national origin, language preference, religion, sexual orientation, gender identity, age, or disability.
- *First Amendment Issues:* Did the officers fully respect individuals' exercise of freedom of speech and assembly, and their ability to record incidents?

#### K. PROFESSIONALISM

Professionalism in the context of law enforcement encounters refers to the conduct, demeanor, and adherence to the ethical and procedural standards expected of law enforcement officers. The professionalism of law enforcement officers is fundamental to maintaining public trust and confidence in the criminal justice system. It is essential for the fair and effective administration of justice and for fostering positive community relations. By continually evaluating and reinforcing professional standards, police departments evidence their commitment to the highest ideals of law enforcement and community service. Key considerations in the assessment of professionalism include:

- *Consistency with Training and Policy:* Was the officer's behavior consistent with the PD's training and policy guidelines?
- *Interaction with the Public:* Did the officers demonstrate courtesy, respect, and ability to effectively communicate in their interactions with the public?
- *Handling of Stressful Situations:* Did the officer effectively handle stress and maintain professionalism in challenging or high-pressure situations?
- *Impartiality and Fairness:* Were the officer's actions and decisions impartial and fair, free from bias or prejudice?

#### L. TACTICS

Effective and safe tactical execution is essential for the success of law enforcement operations and for the protection of officers and the public. Reviewing the tactics employed in various incidents can foster an environment of continuous tactical improvement, heightened safety, and professionalism in the PD's practices. Key considerations in the assessment of tactics include:

- *Appropriateness of Tactics:* Were the tactics used appropriate for the situation, considering factors such as the nature of the incident, the level of threat, and the available resources?

- *Officer Safety:* Did the tactics employed prioritize officer safety, including the use of protective equipment, adherence to safety protocols, and situational awareness?
- *Public Safety:* Was the impact of officers' tactics on public safety reasonable, including risk mitigation strategies to protect bystanders and prevent unnecessary harm or escalation?
- *Tactical Training and Preparedness:* Did the tactics employed align with the officers' training and preparedness, and did the officers apply tactical knowledge and skills effectively?
- *De-Escalation Techniques:* Did the officers use effective de-escalation techniques as part of their tactical approach, to enable the resolution of situations with minimal force and conflict?
- *Decision-Making and Judgment:* Did the officers exercise effective decision-making and judgment in choosing and implementing tactics?
- *Compliance with Policy and Best Practices:* Were the tactics employed in compliance with departmental policies and recognized best practices in law enforcement?

#### M. EQUIPMENT ISSUES

Various types of specialty equipment are used in policing. Malfunctioning or improper use of equipment can affect policing outcomes; accordingly, it is important to avoid such issues. Key considerations in the assessment of equipment issues include:

- *Equipment Malfunction and Failure:* Were there any instances of equipment malfunction or failure during the incident, and did such equipment malfunctions or failures affect the outcome of the incident?
- *Inappropriate Use of Equipment:* Was any equipment used inappropriately or contrary to training and protocols?
- *Training and Handling:* Did the officers' handling of equipment during the incident align with standard training and protocols?

#### N. OFFICER(S) DOCUMENTATION

Officer documentation of police incidents is a critical aspect in policing. The written and recorded accounts of incidents must be thorough, accurate, reliable, and timely, thereby supporting the principles of accountability, transparency, and continuous improvement in policing practices. Key considerations in the assessment of officer documentation include:

- *Completeness and Accuracy:* Did officer documentation thoroughly and accurately represent the events of the incident, with sufficient detail and clarity in the descriptions provided?
- *Consistency with Evidence:* Was officer documentation, including RIPA form completion, consistent with other available evidence, such as video footage?

- *Timeliness and Procedure Compliance:* Was officer documentation completed in a timely manner following the incident?
- *Transparency and Objectivity:* Did officer documentation have any signs of bias, subjectivity, or omission of critical information?

#### O. POLICY AND RELATED TRAINING IMPLICATIONS

Police work needs to adapt and evolve in response to changing environments, particularly relating to social evolution, technology, criminal trends, legal trends, and evolving citizen expectations. In order to keep pace with evolving challenges and remain responsive and relevant to the public safety needs of the community, periodic updates need to be made to law enforcement policies and practices and related training. Assessing the need for potential policy changes and training updates in the wake of a specific incident is an important component of ensuring that law enforcement practices remain responsive to evolving challenges. Key considerations in the assessment of policy and related training implications include:

- *Relevance and Effectiveness of Current Policies and Training:* Did the policies and related training implicated in the incident provide appropriate guidance for officers to follow under the circumstances of the incident?
- *Policy/Training Gaps or Deficiencies:* Did the existing controlling policies and related training relevant for the incident have any gaps or deficiencies that influenced the decisions and/or actions of officers and the outcome of the incident?
- *Best Practices and Benchmarking:* Are the current policies and related training aligned with best practices and standards considering any insights from other agencies or jurisdictions that have successfully implemented policies and training addressing similar issues?

#### P. SUPERVISORY REVIEW

Assessing the role of the supervisor in, and any supervisory review of, a specific police incident is crucial to determine whether oversight mechanisms are functioning effectively. A thorough, appropriate and effective supervisory review, including supervisory response, on-scene supervision and supervisory investigation (where required), is essential for ensuring accountability, transparency and fairness within law enforcement. It serves as a key mechanism for overseeing the decisions and conduct of officers and maintaining high standards of conduct in the handling of incidents. This standard serves to enhance public trust and fosters continuous improvement through applied coaching and mentoring when performance can be improved. Key considerations in the assessment of supervisory review include:

- *Comprehensiveness of the Review:* Was the supervisory review thorough, appropriate and effective? Did the supervisory review examine all aspects of the incident, including the decisions and actions of involved officers and the situational context? Did the supervisory

review adequately consider all relevant evidence, including documentation, witness statements, and any available audio-visual material?

- *Adherence to Procedures and Standards:* Was the supervisory review conducted in accordance with established departmental procedures, industry standards, legal requirements and ethical obligations?
- *Objectivity and Impartiality:* Was the supervisory review conducted in an impartial manner, with no conflicts of interest or biases that could have influenced the outcome? Was the supervisory review conducted in an objective manner, free from external pressures or influences?
- *Timeliness and Responsiveness:* Was the supervisory review conducted in a timely manner, considering the urgency and seriousness of the incident, that allowed for prompt corrective action and response?
- *Outcomes and Recommendations:* Were the conclusions and recommendations made as a result of the supervisory review effective? Were the actions taken as a result of the supervisory review effective, including disciplinary measures, policy changes, or additional training?

#### Q. CONTINUOUS IMPROVEMENT AFTER ACTION REVIEW

The question: "What could have been done differently to have reasonably achieved a potentially better outcome?" is an essential component of a continuous improvement philosophy in the assessment of police incidents. While this is an element of the assessment during its reviews, the intention is for PD officers to ask this question of themselves for all facets of their law enforcement activities, from pre-incident planning through supervisory review of the incident, leading to a refinement of incident response strategies and management practices, in turn leading to more effective and safer outcomes in future situations. Regularly questioning and analyzing incident outcomes fosters a proactive mindset, emphasizing the importance of ongoing improvement and adaptation in law enforcement practices. When done properly, this process not only aids in identifying areas for growth and development but also reinforces a commitment to excellence, accountability, and progressive change in law enforcement. Key considerations in the assessment of different approach/better outcome include:

- *Alternative Approach/Better Outcome:* Could officers have executed alternative strategies, decisions, or actions to have reasonably achieved a potentially better outcome?
- *Alternatives to Arrest:* Were there opportunities where alternatives to arrest could have been employed, in line with a compassionate and community-focused approach to policing, in particular with respect to unhoused individuals and individuals with mental health and substance abuse issues?

- *Reflective Mindset:* Is there evidence that the officers used a reflective and analytical approach in their self-evaluation of the incident? Did the officers exhibit a mindset of learning and improvement?

## VIII. THE IPA'S 360-DEGREE INCIDENT REVIEW CRITERIA (Pursuits)

When evaluating a pursuit the following criteria is applied. In cases where a pursuit ends with a use or display of force, then all sections above applicable to the use or display of force are included.

In incidents involving pursuits, it is critical for public and officer safety that pursuits align with departmental policies and legal standards, and that they prioritize public and officer safety at all stages of the pursuit, including the initiation, conduct, and termination of the pursuit. Key considerations in the assessment of pursuits include:

- *Justification for the Pursuit:* Was the pursuit initiated based on a clear and justifiable reason, and aligned with PD policies and legal standards?
- *Adherence to Pursuit Policies:* Did officers involved in the pursuit adhere to departmental policies regarding when to initiate or terminate a pursuit?
- *Risk Assessment:* Did the risk assessment conducted by officers before and during the pursuit, appropriately consider the safety of the public, the officers, and the suspect?
- *Decision-making and Communication:* Was the decision-making process and the communication among officers and with dispatch during the pursuit effective and appropriate?
- *Outcome of the Pursuit:* Was the conclusion of the pursuit, including any arrests, injuries, or property damage, handled appropriately?
- *Documentation and Supervisory Review:* Was the documentation relative to the pursuit complete and accurate and was the supervisory review appropriate in documenting the supervisor's assessment of the pursuit including lessons learned and any corrective actions to be taken?

## IX. THE IPA'S 360-DEGREE INCIDENT REVIEW CRITERIA (Complaints)

When evaluating a complaint investigation, the following criteria is applied.

For complaint investigations, the thorough and impartial assessment of how police departments investigate citizen complaints is a cornerstone of maintaining integrity and public trust in law enforcement. Such evaluations are pivotal for assessing compliance with legal and ethical standards and for reinforcing a culture of accountability within police agencies. Reviewing the investigative

processes and reporting mechanisms of complaints enables an assessment of whether each case was handled with the utmost diligence, fairness, and transparency. This type of review is essential in identifying strengths and areas for improvement in the department's approach to internal oversight. It serves as a critical mechanism for promoting organizational learning, enhancing community relations, and upholding the principles of justice and professionalism that are fundamental to the mission of law enforcement. In the pursuit of transparency and accountability, the PD has established a robust and accessible system for receiving citizen complaints to include a wide array of channels to accommodate the diverse needs and preferences of the community. Complaints can be submitted through the department's website, via email, by phone, through traditional US mail, or directly to an officer or at a police facility. Internally, complaints may originate from supervisors or fellow officers who observe conduct that warrants review. For each incident review involving a complaint, the IPA will note the origin of the complaint. Key considerations in the assessment of complaint investigations include:

#### Interviews:

- *Selection of Interviewees:* Were all potential witnesses properly identified and interviewed, including the complainant, the accused personnel, bystanders, and other relevant parties? Interviews are a pivotal component of the investigative process in resolving internal and citizen complaints within law enforcement agencies. They provide an opportunity to gather firsthand accounts, clarify details, and understand the perspectives of all involved parties.
- *Comprehensive and Impartial interviews:* Were the interviews conducted comprehensive and impartial? Effective interviews can illuminate the facts of the case, reveal inconsistencies, and contribute significantly to establishing the veracity of the complaint. Conducting comprehensive and impartial interviews is essential for assessing the thoroughness and fairness of the investigation.
- *Appropriateness of Questioning:* Was a structured approach employed in the interviews that established a conducive environment? Were open-ended, non-leading questions used to elicit detailed responses? Were the questions free of any bias or preconceptions on the part of the investigator? Were follow-up questions utilized to confirm that all relevant information was obtained? Were witnesses interviewed separately and in-person when practical and beneficial?
- *Interview Recording and Documentation:* Were all interviews recorded and was the documentation of such interviews accurate and complete?

#### Evidence Collection and Review:

- *Evidence Collection:* Were all relevant forms of evidence actively collected, including body-worn camera footage, any additional video from the scene, photographs, and diagrams of the incident location?
- *Documentation of Physical Scene:* Was the scene of the incident adequately documented when necessary, including the taking of photographs and creating diagrams when beneficial

for understanding the case to capture a clear and detailed representation of the physical context in which the incident occurred?

- *Completeness of Documentary Evidence:* Were all documents pertinent to the matter gathered and reviewed including officer reports, witness statements, and any administrative paperwork related to the incident, or the individuals involved?
- *Review of Video Evidence:* Was body-worn camera footage and other video evidence reviewed to provide a clear and objective account of the events as they unfolded, including an analysis of actions, behaviors, and any verbal exchanges captured in the footage?
- *Evidence Preservation:* Was evidence integrity maintained throughout the process, with appropriate measures taken to preserve such evidence, including the safeguarding of digital data, maintaining a chain of custody for physical evidence, and ensuring that evidence is not tampered with or degraded?
- *Use of Video Evidence:* Was video evidence such as BWC footage appropriately utilized during interviews to clarify events, challenge inconsistencies, and corroborate statements?

*Complaint Investigation Process:*

- *Leads:* Did the investigator pursue all relevant and material leads during the investigation, including tracking down additional witnesses, seeking out further evidence, and exploring any new information that arose during the investigation?
- *Bias:* Was there any indication of bias or unfairness in the conduct of the investigation? This entails examining the investigator's approach to all parties involved, ensuring that actions and decisions were based on evidence and facts rather than preconceived notions or prejudices.
- *Comprehensiveness:* Was the investigation comprehensive and meticulous, covering all aspects of the incident? This includes a complete examination of the circumstances, context, and actions of all individuals involved.
- *Consideration of All Evidence:* Was there any minimization or disregard of any evidence that could impact the outcome of the investigation? All evidence, regardless of whether it supported or contradicted initial assumptions, was given appropriate consideration and weight.
- *Objective:* Did the investigator maintain an objective standpoint throughout the process, analyzing evidence and statements critically and without bias? This includes evaluating the credibility of all sources and cross-referencing information to confirm its accuracy.
- *Transparency:* Was the investigation conducted transparently, with clear and comprehensive documentation of each step and finding? Does such documentation comprehensively record the investigative process? And does such documentation support the conclusions reached?
- *Timeliness:* Was the complaint investigation completed in a timely manner from date of intake to the date of completion? The prompt resolution of internal and citizen complaints is crucial in maintaining the integrity and efficacy of police oversight mechanisms. Swift

investigative action not only demonstrates the department's commitment to accountability but also helps in preserving the trust and confidence of the community. It is essential, however, to recognize that the time necessary to thoroughly investigate a complaint can vary widely, depending on the complexity of the complaint and the intricacies of the underlying incident. A balanced approach is required to assess whether investigations are conducted as expeditiously as possible, without compromising the thoroughness and fairness needed to reach just and accurate conclusions. Timely investigations can prevent the escalation of community concerns, reduce the potential for misinformation, and enable the timely implementation of corrective actions or disciplinary measures.

#### Investigation Report:

The creation of clear, concise, and unbiased complaint investigation reports is important as complaint investigation reports serve as the official record of the investigation and also as a testament to the department's commitment to transparency, accountability, and justice. A well-crafted report is essential for several reasons: it provides a trustworthy account for all parties involved, including the complainant, the subject of the complaint, and the community at large; it enables the investigative process to be documented in a manner that is easily understandable and free from ambiguity; and it upholds the integrity of the investigation by presenting facts and findings in an impartial and objective manner. The quality of these reports is a direct reflection of the department's dedication to upholding the highest standards of law enforcement practice and to fostering trust within the community it serves. Key considerations in the assessment of a complaint investigation report include:

- *Report Layout:* Was the report structured in a logical, coherent manner, facilitating clear understanding and ease of navigation through the document? Was the presentation of information, findings, and conclusions well organized?
- *Investigation Synopsis:* Did the report include a concise and accurate synopsis of the complaint, providing a clear understanding of the allegations and the context of the investigation?
- *Appropriate Discussion of Each Allegation:* Did the report thoroughly address each specific allegation made in the complaint? This involves an individual examination of the facts and evidence relevant to each allegation.
- *Appropriate Conclusions:* Were the conclusions in the report appropriate, based on evidence, sound reasoning and supported by the investigation's findings?
- *Avoidance of Unsupported Conclusory Statements:* Did the report refrain from making conclusory statements without proper evidentiary support? Were all conclusions and assertions backed by specific findings from the investigation?

- *Identification of Exculpatory Evidence:* Did the report identify and consider all exculpatory evidence that could suggest the innocence or mitigate the responsibility of the subject of the complaint?
- *Identification of Inculpatory Evidence:* Did the report identify and evaluate all inculpatory evidence that could indicate the culpability of the subject of the complaint?
- *Neutral Tone:* Did the report maintain a neutral tone throughout, devoid of any evident bias towards either party? Were the facts and findings presented in an impartial and objective manner?

## X. THE IPA'S INCIDENT REPORTING

The IPA's findings from its 360-degree incident reviews will be fully documented and reported to command staff as soon as practical after the review. Thereafter, the IPA will discuss its findings with PD Command Staff at regular (typically twice-monthly) meetings and collaborate with the PD command staff regarding what, if any, actions should be taken in light of the findings. The IPA will track recommendations and remediations that have been mutually agreed upon. These recommendations will fall into two major buckets: those that are specific to an individual officer and those that have broader applicability to specific units or the PD as a whole.

### A. SUMMARY OF INCIDENT REVIEW AND ITEMS FOR DISCUSSION

When the 360-degree incident review is complete for each incident, the IPA will prepare a consolidated summary of the key issues and unresolved questions identified during the incident review and summarize any exemplary conduct identified in the incident using the report template included as Attachment 1. The aim is to provide a clear and concise overview of the areas that require further attention, resolution, or action; and to recognize any exemplary conduct identified. This summary serves as a guide for prioritizing efforts in addressing the challenges uncovered and in formulating strategies for improvement and a roadmap for emulating exemplary conduct.

The purpose of this summary is to:

- Highlight critical issues that emerged during the review.
- Outline significant questions that remain unresolved or require deeper investigation, thereby setting the agenda for subsequent analysis, discussion, and decision-making.
- Highlight any exemplary conduct that was identified in the review.

While this summary is specific for each incident reviewed, it is also forward-looking, intending to inform future policy decisions, training programs, and operational strategies. It is designed to address the specifics of the incident and contribute to the broader goal of continuous improvement.

## B. RECOMMENDATIONS

After completion of the incident review summaries, the IPA will outline its recommendations from its comprehensive 360-degree incident review. These recommendations are designed to address specific issues and exemplary conduct identified during the review and to promote overall improvement in law enforcement practices. The aim is to provide targeted guidance for remedial actions, policy enhancements, and training initiatives. The IPA's recommendations are broken down into three major categories: Specific Officer Remediation; General Departmental Recommendations; Specific Officer Commendation.

1. *Specific Officer Remediation:* The IPA will detail any recommendations for individual officers involved in the incident, focusing on areas such as additional mentoring, coaching, training, counseling, or disciplinary actions, as warranted by the findings of the 360-degree incident review.<sup>2</sup> Each recommendation will be tailored to the circumstances and actions of the specific officers, ensuring a personalized and effective response to the issues identified.
2. *General Departmental Recommendations:* The IPA will propose any broader training, policy and equipment recommendations that extend beyond the scope of the individual officers involved as raised by the specific incident under review. Recommendations focus on enhancing overall departmental preparedness, responsiveness, and adherence to best practices and could include updates to existing policies, introduction of new training modules, and leveraging technology for education purposes.
3. *Recommendations for Officer Recognition:* The IPA will recognize exemplary conduct of officers in any of the areas assessed as it is just as important to recognize model conduct and use it as a teaching tool as it is to address and use potential issues.

## C. POST-REVIEW CONFERENCE WITH THE POLICE DEPARTMENT

Documentation of each 360-degree incident review will be shared with the PD. In regular (typically twice-monthly) post-assessment meetings with the PD Command Staff and relevant personnel, the IPA will review all issues and notable observations relating to each incident. These meetings are a cornerstone of the IPA's collaborative review process, designed to comprehensively discuss the findings and recommendations emanating from the 360-degree incident reviews in order to remediate any issues found. These meetings are called RISKS meetings; RISKS is an acronym for the Remediation of Identified Situations Key to Success.

- *Documentation of Findings:* For each incident reviewed, the IPA will present documentation relating to its review, including any issues and notable observations regarding exemplary conduct in any of the assessment areas. The documentation is structured to facilitate a clear understanding of the IPA's observations and the underlying data supporting them.

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<sup>2</sup> It will be incumbent on the supervisory and chain of command of any individual officer to ensure that recommended remediations are, in fact, completed.

- *Discussion of Recommendations:* The IPA will discuss its recommendations regarding actionable steps for improvement and the rationale behind each recommendation. During these meetings, the IPA will encourage open dialogue, allowing the PD representatives to provide context, ask questions, and express concerns.
- *Collaborative Action Planning:* The core of each RISKS meeting involves collaboratively developing an action plan to address any notable observations. This process ensures that the recommendations are feasible and aligned with the PD's operational capabilities and strategic goals.
- *Accountability:* The IPA has established a mechanism for follow-up and accountability, to confirm that agreed upon timelines for implementing the action plan are met.

## ATTACHMENT 1: The IPA's 360-Degree Incident Review Report Template

**Incident Review**

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**THE INCIDENT**

The following incident was reviewed by the Independent Police Auditor:

<b>Incident number:</b>	
<b>Date of incident:</b>	
<b>Time of incident:</b>	
<b>Place of incident:</b>	
<b>Incident summary:</b>	
<b>Incident initiated by:</b>	

**REVIEW DETAILS**

The details of the review are as follows:

<b>Date of Review:</b>	«Date_of_Review»
<b>Reviewer(s):</b>	
<b>Reason For Review:</b>	
<b>Documents Reviewed:</b>	

**INVOLVED OFFICER(S) AND SUBJECT(S)**

The following were involved in this incident:

<b>Involved Officer(s):</b>	
<b>Involved Subject(s):</b>	

**BODY WORN CAMERA ASSESSMENT**

BWC was reviewed as follows: (Note: The listing of a review does not necessarily mean that the entire BWC video of that officer was reviewed.)

<b>BWC Officers Reviewed:</b>	
<b>BWC Assessment:</b>	
<b>BWC Comment:</b>	

**IMPLICATED POLICIES**

The following policies are implicated in this incident and review:

<b>Applicable Policies Implicated:</b>	
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### Incident Review

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#### PRE-INCIDENT ACTIONS ASSESSMENT

The assessment of each of the following pre-incident (pre-UOF):

<b>Pre-Incident Info Gathering, Planning and Decision Making Evaluation:</b>	
<b>Pre-Incident Info Gathering, Planning and Decision Making Evaluation Comment:</b>	

#### LEGAL PREDICATE FOR CONTACT WITH SUBJECT

The following is the assessment of the legal predicate for contact with the subject:

<b>Level of Initial Contact:</b>	
<b>Assessment of Legal Predicate for Contact with Subject:</b>	
<b>Legal Predicate for Contact with Subject Comment:</b>	

#### COMMUNICATIONS WITH SUBJECTS ASSESSMENT

The following is an assessment of officer-subject communication:

<b>Communications Assessment:</b>	
<b>Communications Assessment Comment:</b>	

### Incident Review

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#### DE-ESCALATION ASSESSMENT

The following is a general assessment of de-escalation techniques utilized by officers:

<b>De-escalation and Alternative Assessment:</b>	
<b>De-escalation and Alternative Comment:</b>	

#### USE OR DISPLAY OF FORCE ASSESSMENT

The following areas involving any uses or displays of force were assessed as follows:

<b>UOF Displayed or Employed:</b>	
<b>UOF Other (if checked)</b>	
<b>UOF Description:</b>	
<b>Legal Justification of Use of Force:</b>	
<b>Legal Justification of Use of Force Comment:</b>	
<b>Duty to Intervene Assessment:</b>	
<b>Duty to Intervene Comment:</b>	

**Incident Review**

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<b>Medical Response Assessment:</b>	
<b>Medical Response Comment:</b>	
<b>Relief Protocols Assessment:</b>	
<b>Relief Protocols Comment:</b>	

**PURSUIT ASSESSMENT**

The following relates to the assessment of the pursuit:

<b>Pursuit Assessment:</b>	
<b>Pursuit Comment:</b>	

**COMPLAINT INVESTIGATION REVIEW ASSESSMENT**

The following areas are relative to the assessment of the complaint investigation:

<b>Complaint ID:</b>	
<b>Complaint Date:</b>	
<b>Intake Method:</b>	
<b>Complainant Info:</b>	
<b>Complaint Investigation to IPA:</b>	
<b>Time from Receipt to IPA Review:</b>	
<b>Complaint Timeliness:</b>	
<b>Timeliness Comment:</b>	

**Incident Review**

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<b>Investigative Issues:</b>	
<b>Investigative Issue Comments:</b>	
<b>Evidence Collection and Review:</b>	
<b>Evidence Collection Comment:</b>	
<b>Other Investigative Issues:</b>	
<b>Other Investigative Issues Comment:</b>	
<b>Report Issues:</b>	
<b>Report Issues Comment:</b>	
<b>Preliminary Resolution of Complaint:</b>	
<b>Preliminary Resolution Comment:</b>	

**OTHER CONSTITUTIONAL RIGHTS ASSESSMENT**

The following assessment relates to whether there were any potential constitutional rights violations by the involved officers:

<b>Constitutional Rights Assessment:</b>	
--	--

**Incident Review**

Attorney-Client Privileged Correspondence – Not for Distribution

<b>Constitutional Rights Comment:</b>	
---	--

**PROFESSIONALISM ASSESSMENT**

The following assessment relates to the professionalism of the involved officers:

<b>Professionalism Assessment:</b>	
<b>Professionalism Comment:</b>	

**TACTICAL ASSESSMENT**

The following assessment relates to an assessment of tactics of involved officers:

<b>Tactical Assessment:</b>	
<b>Tactical Comment:</b>	

**EQUIPMENT ASSESSMENT**

The following relates to any equipment issues noted in the assessment of this incident:

<b>Equipment Issue Assessment:</b>	
<b>Equipment Comment:</b>	

### Incident Review

Attorney-Client Privileged Correspondence – Not for Distribution

#### DOCUMENTATION ASSESSMENT

The following relates to any documentation issues noted by involved officers:

Assessment of Officer(s) Documentation:	
Assessment of Officer(s) Documentation Comment:	

#### POLICY ASSESSMENT

The following relates to any need for policy review as brought to light by this incident:

Policy Issue(s) Assessment:	
Policy Issue(s) Comment:	

#### SUPERVISORY REVIEW ASSESSMENT

The following areas involving the supervisory review of any uses of force were assessed as follows:

Overall Assessment of Supervisory Review:	
Assessment of Supervisory Comment:	«Assessment_of_Supervisory_Review»

#### CONTINUOUS IMPROVEMENT AFTER ACTION REVIEW

### Incident Review

Attorney-Client Privileged Correspondence – Not for Distribution

The following is our assessment of whether a different approach could have potentially and reasonably yielded a better outcome:

<b>Different Approach/Better Outcome:</b>	
<b>Different Approach/Better Outcome Comment:</b>	

### SUMMARY OF ASSESSMENT ISSUES FOR DISCUSSION AND RECOMMENDATIONS

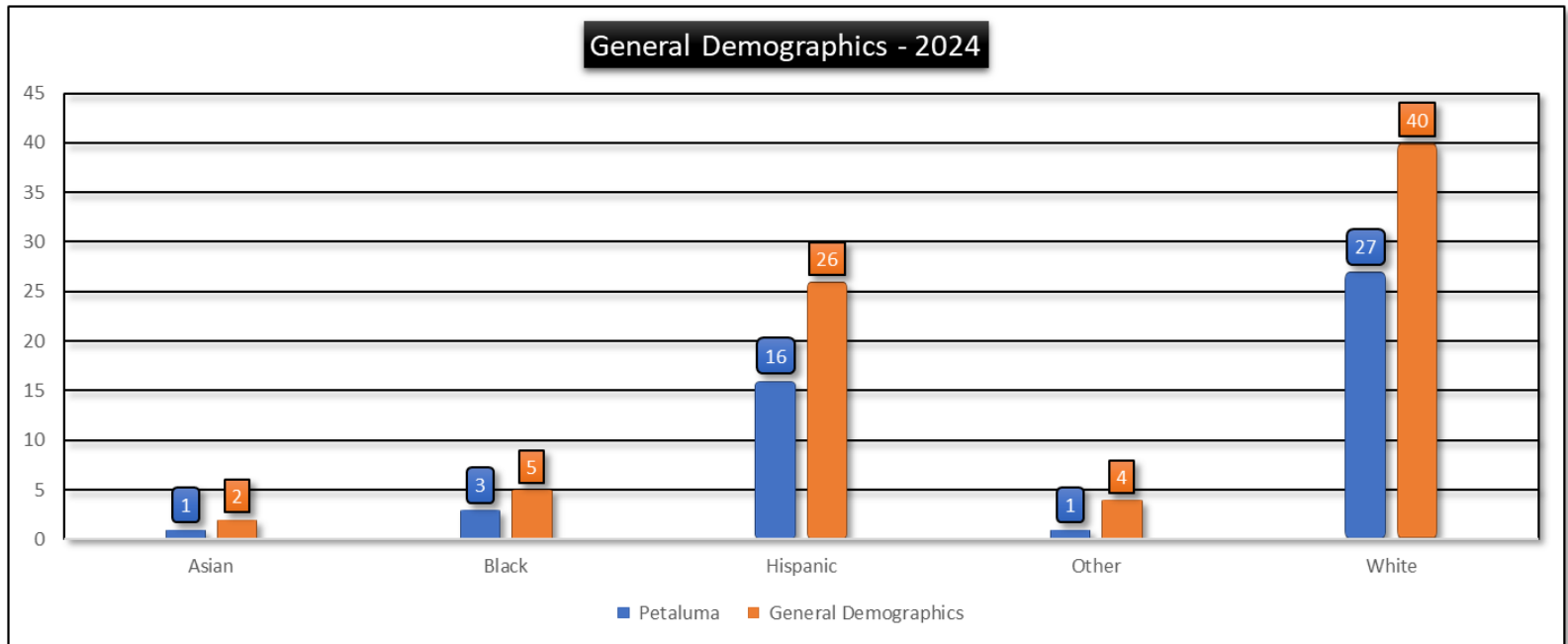
The following section summarizes our assessment of this incident.

<b>Summary Assessment and Observations and Issues:</b>	
<b>Recommendations Comment:</b>	

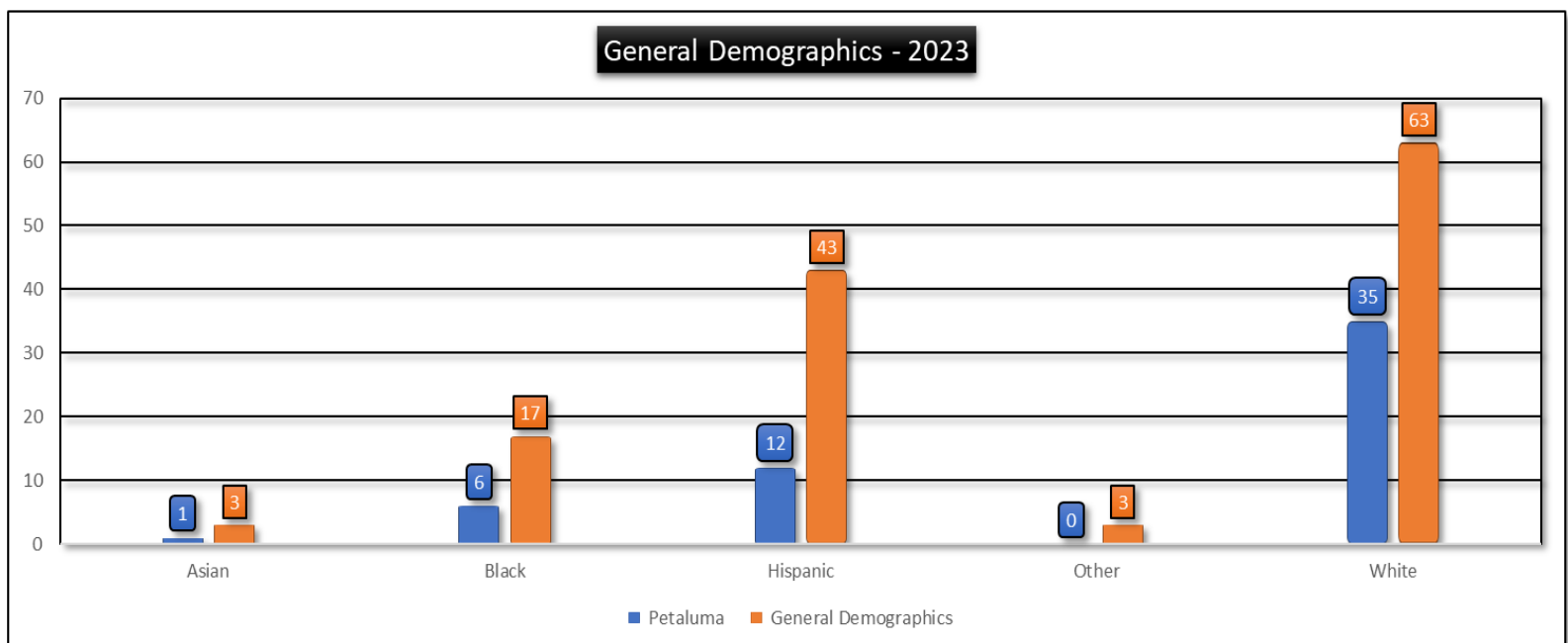
## APPENDIX C – BREAKDOWN OF USES AND DISPLAYS OF FORCE

Appendix Begins on Following Page

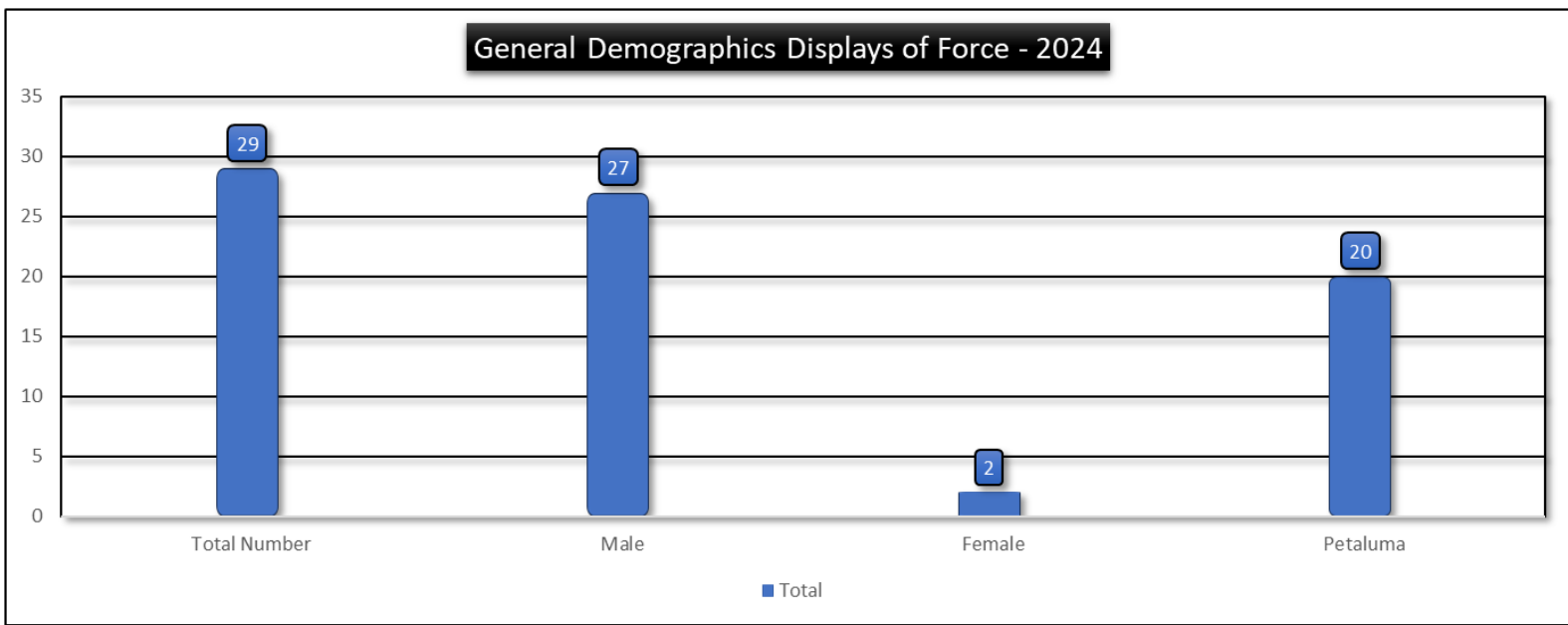
**Chart 1: The following chart shows the RACIAL/ETHNIC breakdown for CY2024 of those individuals who were subject to either a DISPLAY OR USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.**



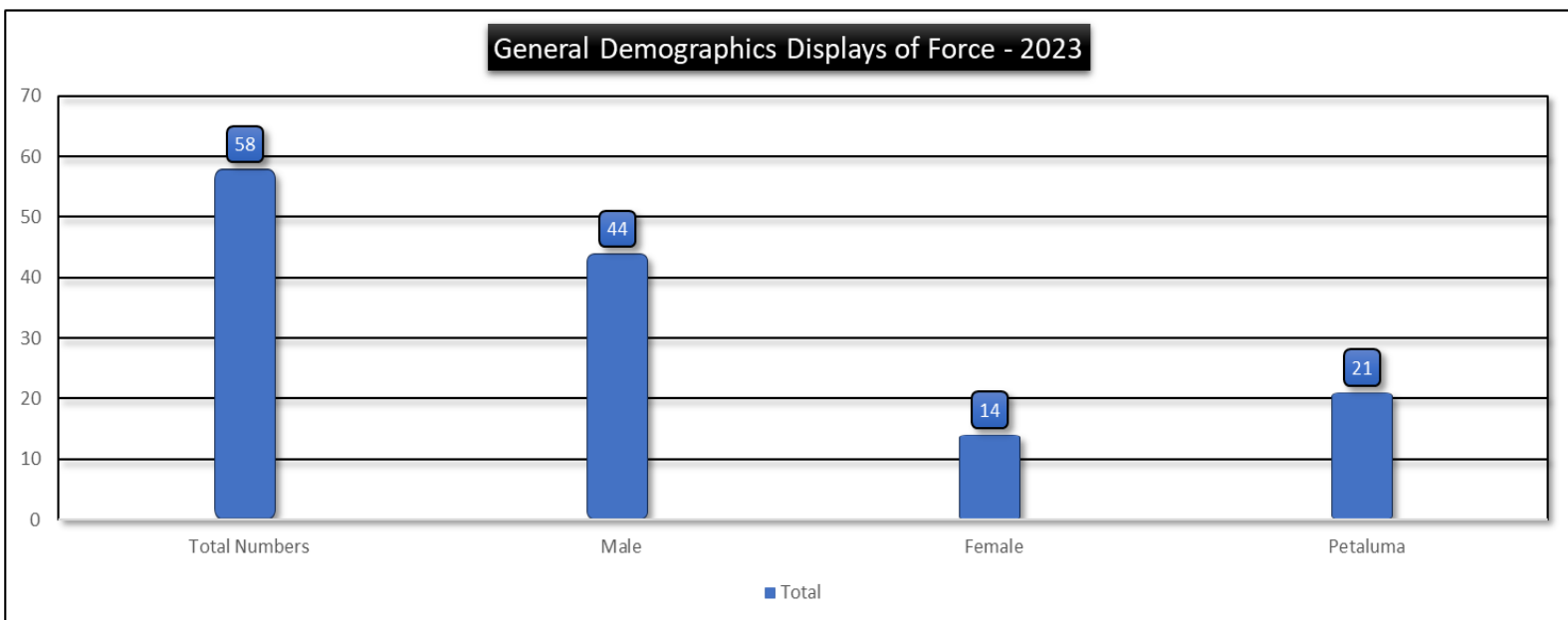
**Chart 1A: The following chart shows the RACIAL/ETHNIC breakdown for CY2023 of those individuals who were subject to either a DISPLAY OR USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.**



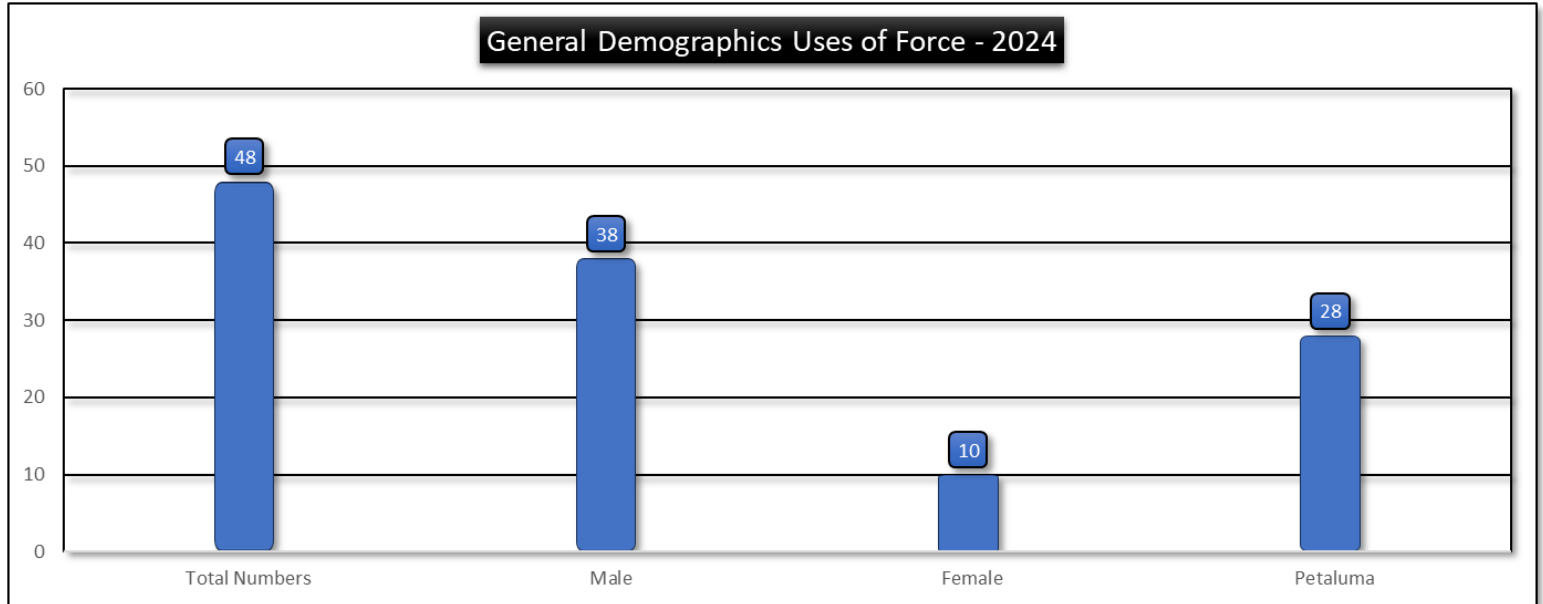
**Chart 2:** The following chart shows the GENDER breakdown for CY2024 of those individuals who were subject to a DISPLAY OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.



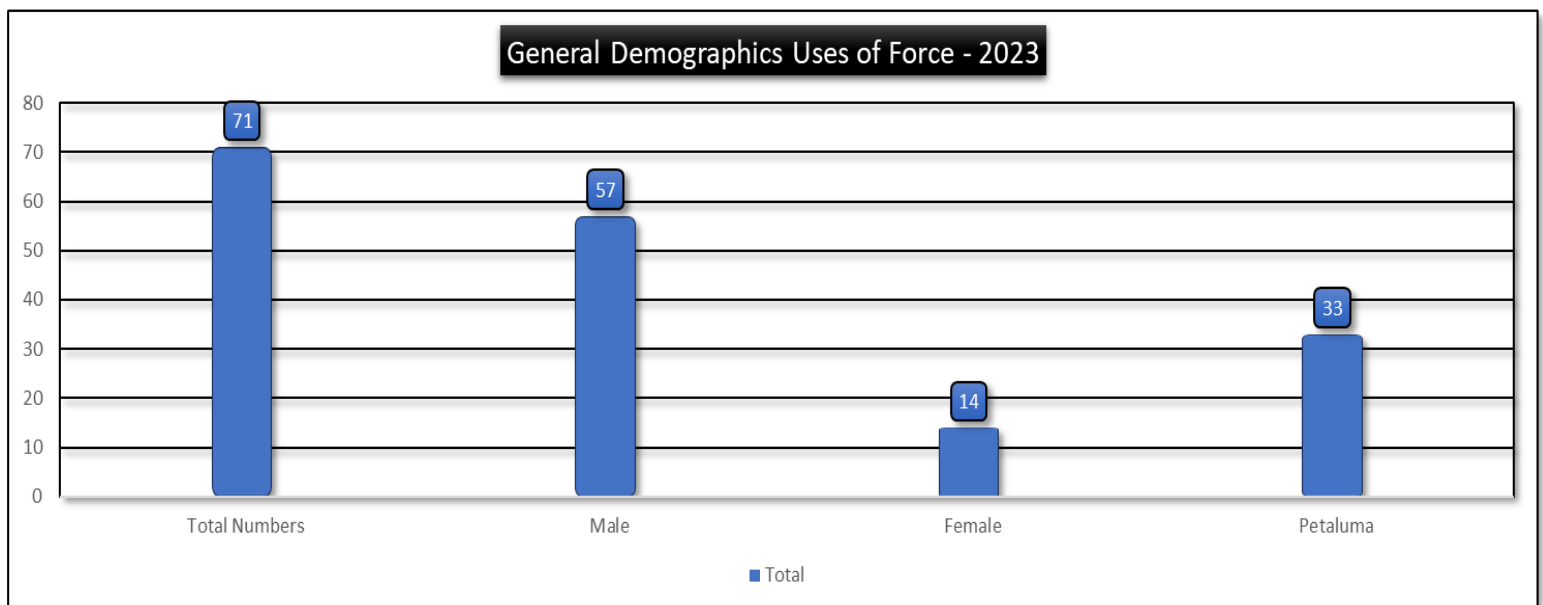
**Chart 2A:** The following chart shows the GENDER breakdown for CY2023 of those individuals who were subject to a DISPLAY OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.



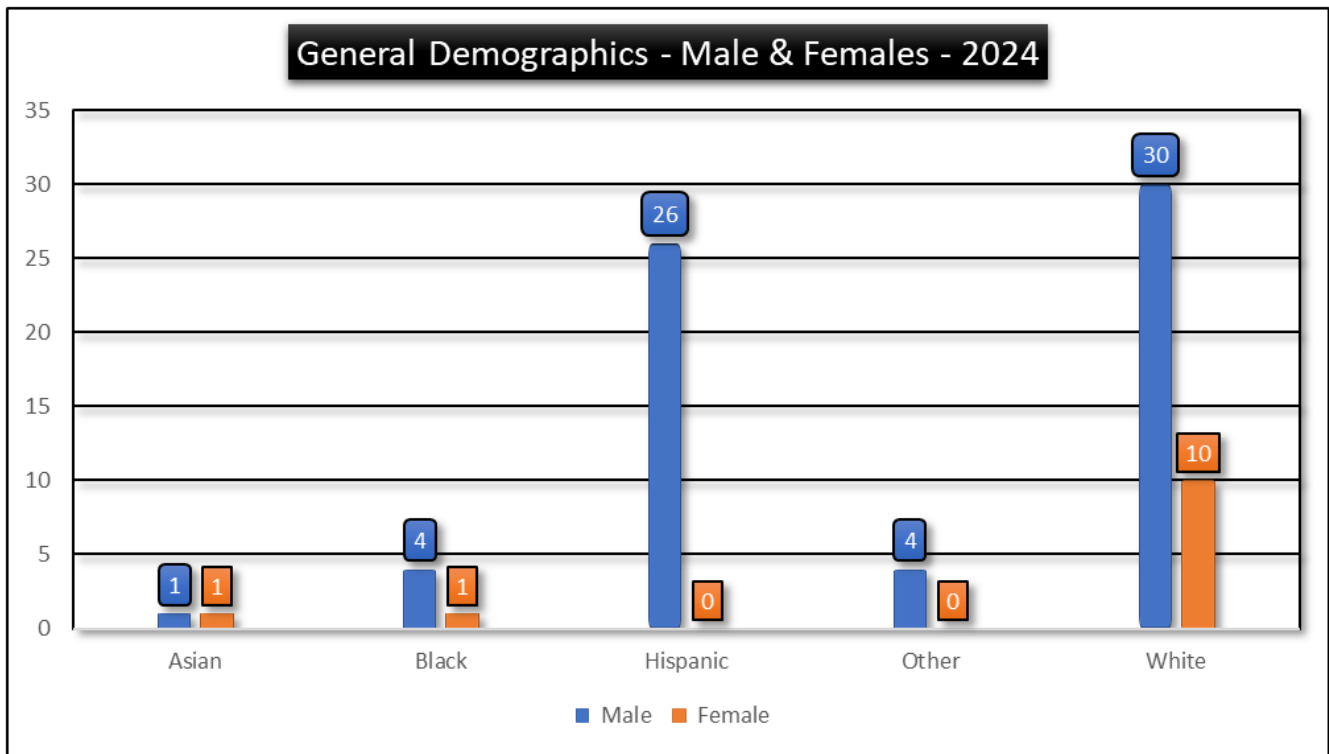
**Chart 3:** The following chart shows the GENDER breakdown for CY2024 of those individuals who were subject to a USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.



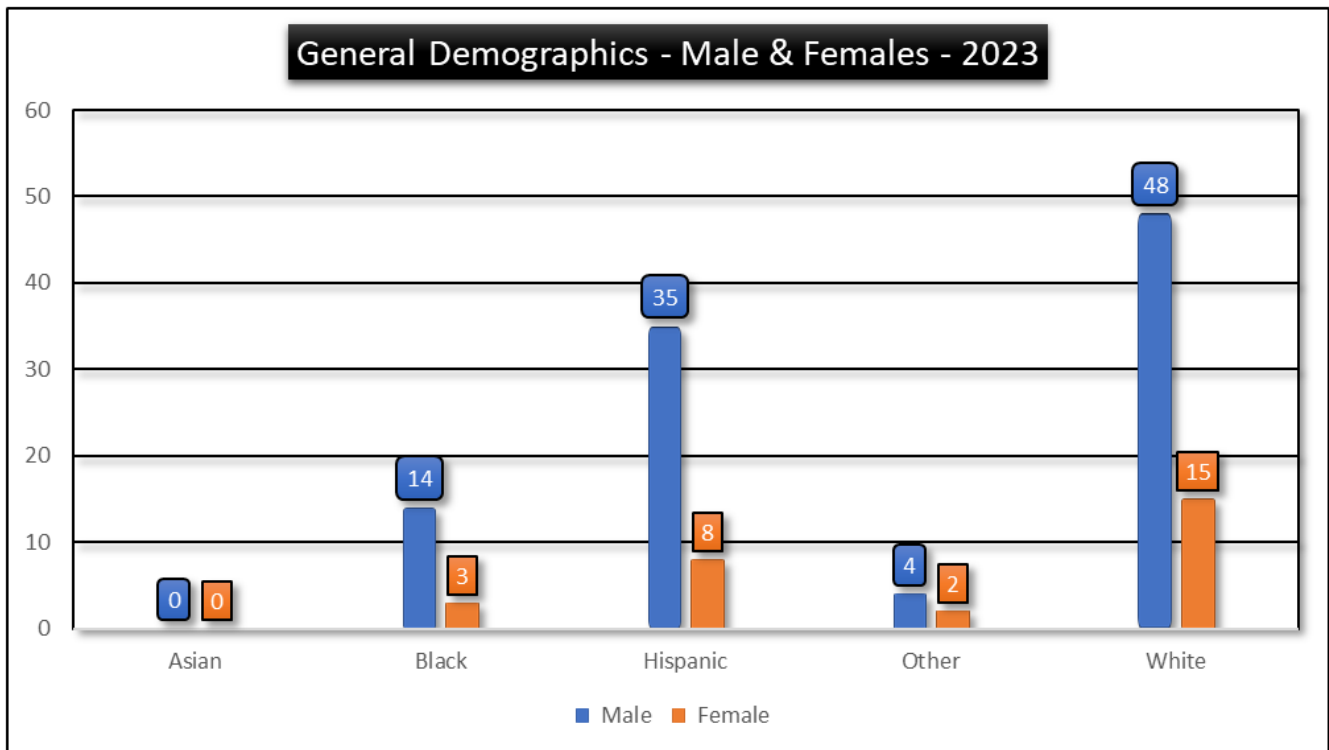
**Chart 3A:** The following chart shows the GENDER breakdown for CY2023 of those individuals who were subject to a USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.



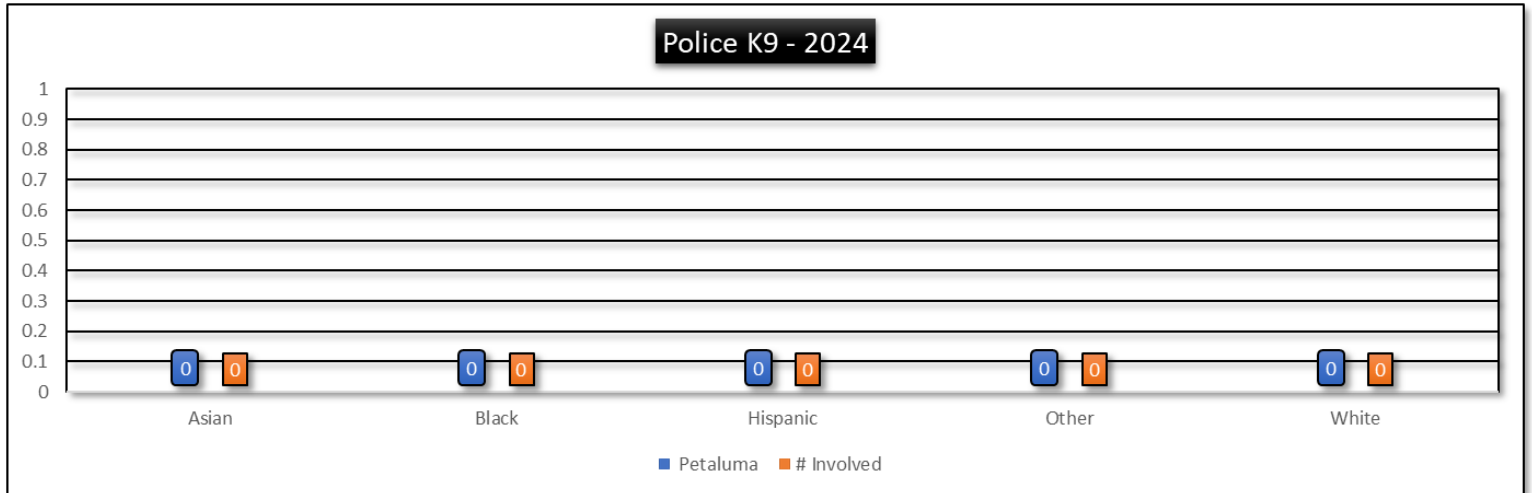
**Chart 4: The following chart shows the GENDER breakdown for CY2024 of those individuals who were subject to either a DISPLAY OR USE OF FORCE.**



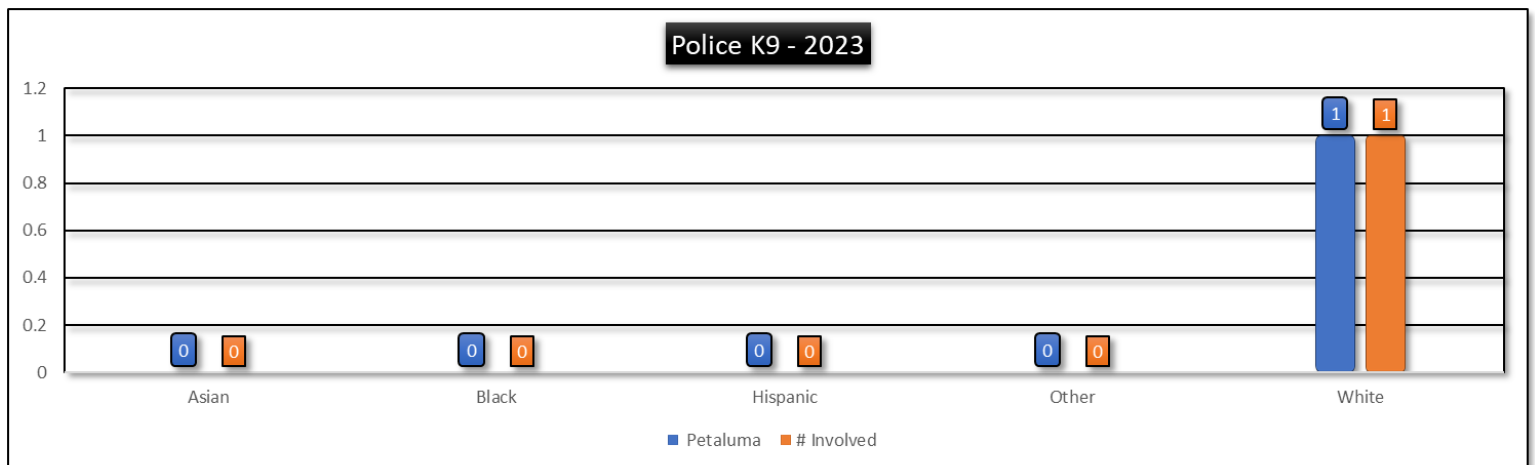
**Chart 4A: The following chart shows the GENDER breakdown for CY2023 of those individuals who were subject to either a DISPLAY OR USE OF FORCE.**



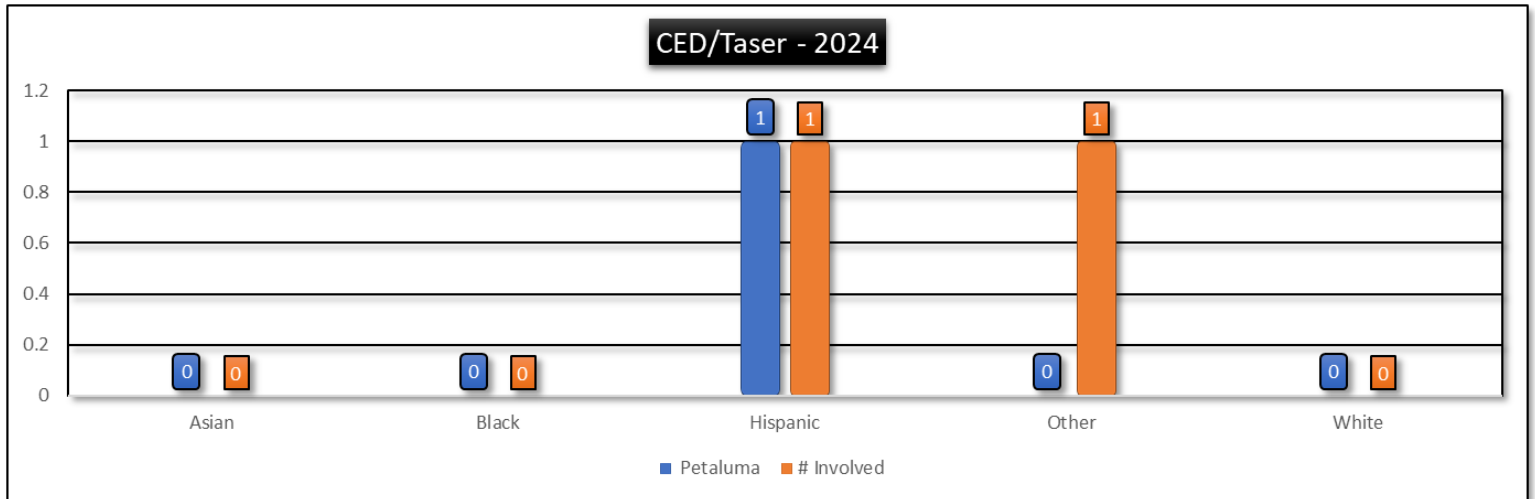
**Chart 5: The following chart shows the RACIAL/ETHNIC breakdown for CY2024 of those individuals who were subject to a CANINE DISPLAY OR USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.**



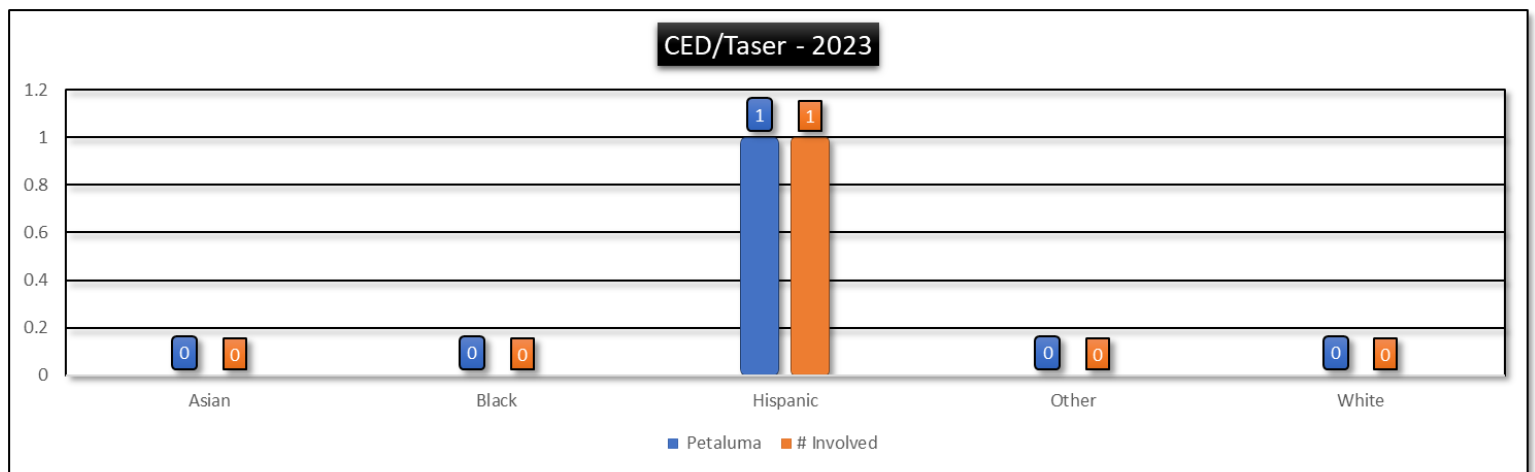
**Chart 5A: The following chart shows the RACIAL/ETHNIC breakdown for CY2023 of those individuals who were subject to a CANINE DISPLAY OR USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.**



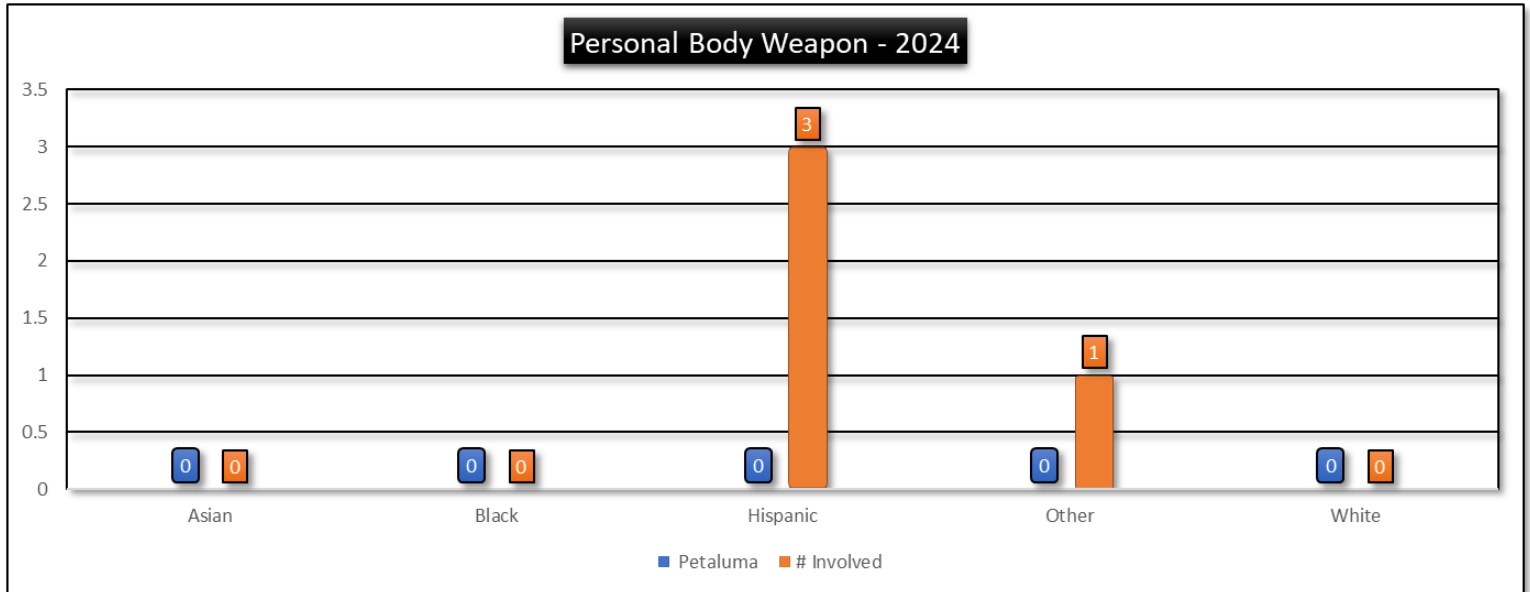
**Chart 6:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2024** of those individuals who were subject to a **CED/TASER DISPLAY OR USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



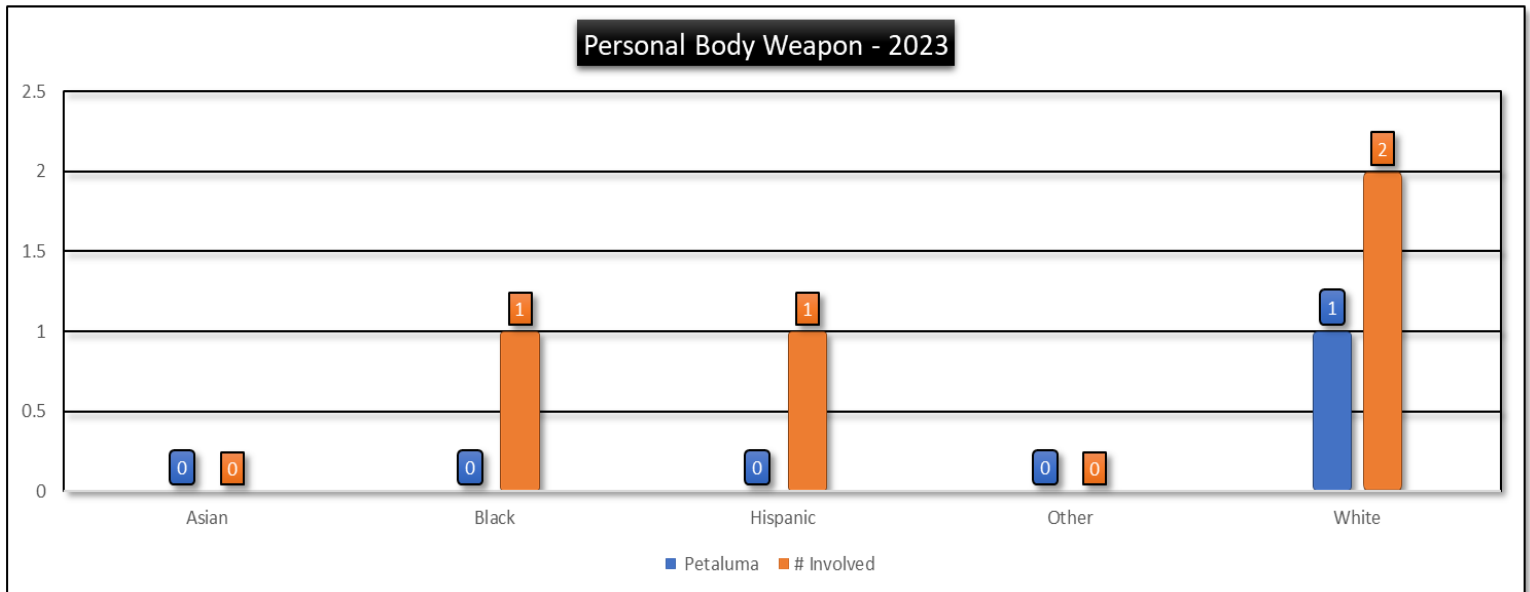
**Chart 6A:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2023** of those individuals who were subject to a **CED/TASER DISPLAY OR USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



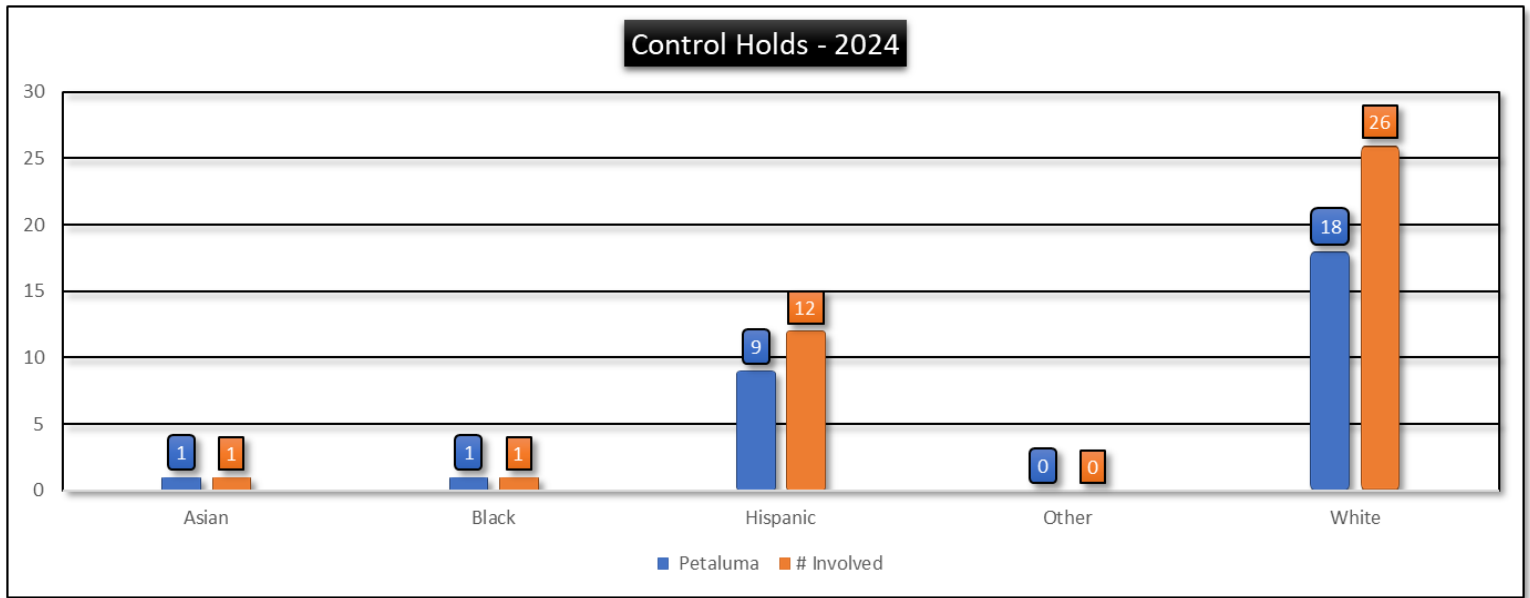
**Chart 7: The following chart shows the RACIAL/ETHNIC breakdown for CY2024 of those individuals who were subject to a PERSONAL BODY WEAPON USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.**



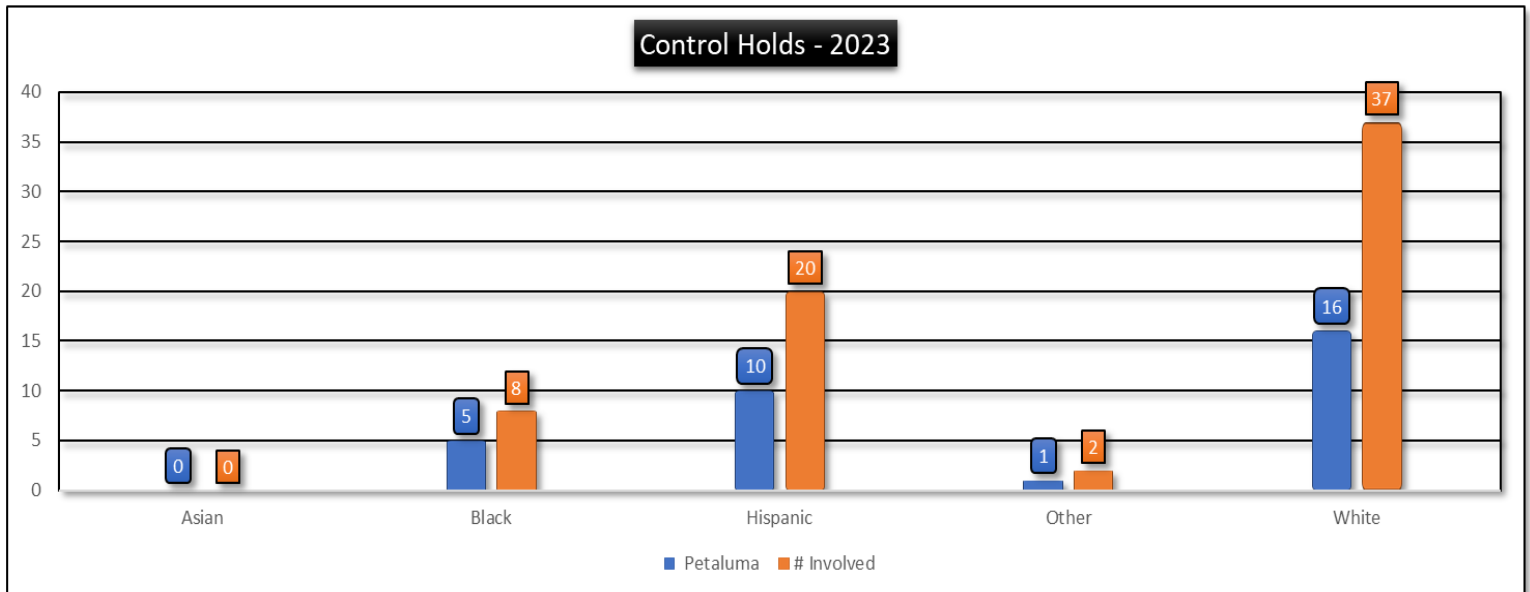
**Chart 7A: The following chart shows the RACIAL/ETHNIC breakdown for CY2023 of those individuals who were subject to a PERSONAL BODY WEAPON USE OF FORCE and the number of such individuals who lived in Petaluma at the time of the incident.**



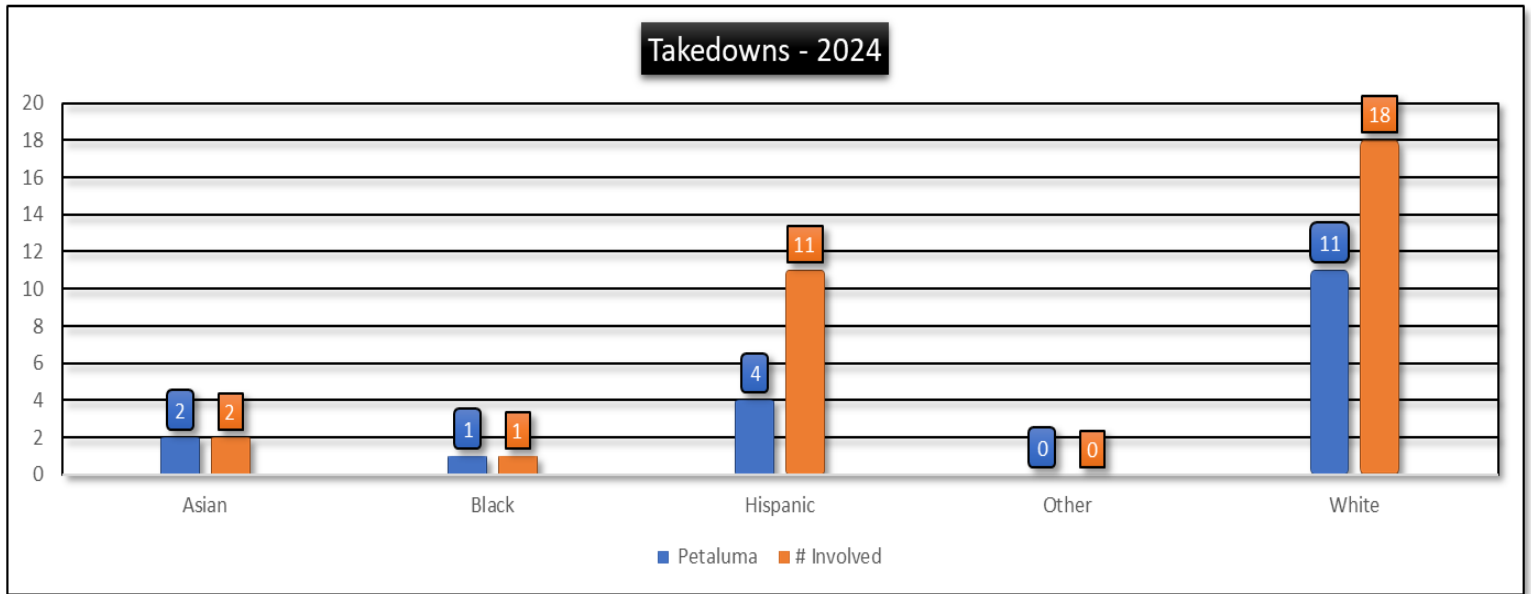
**Chart 8:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2024** of those individuals who were subject to a **CONTROL HOLD USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



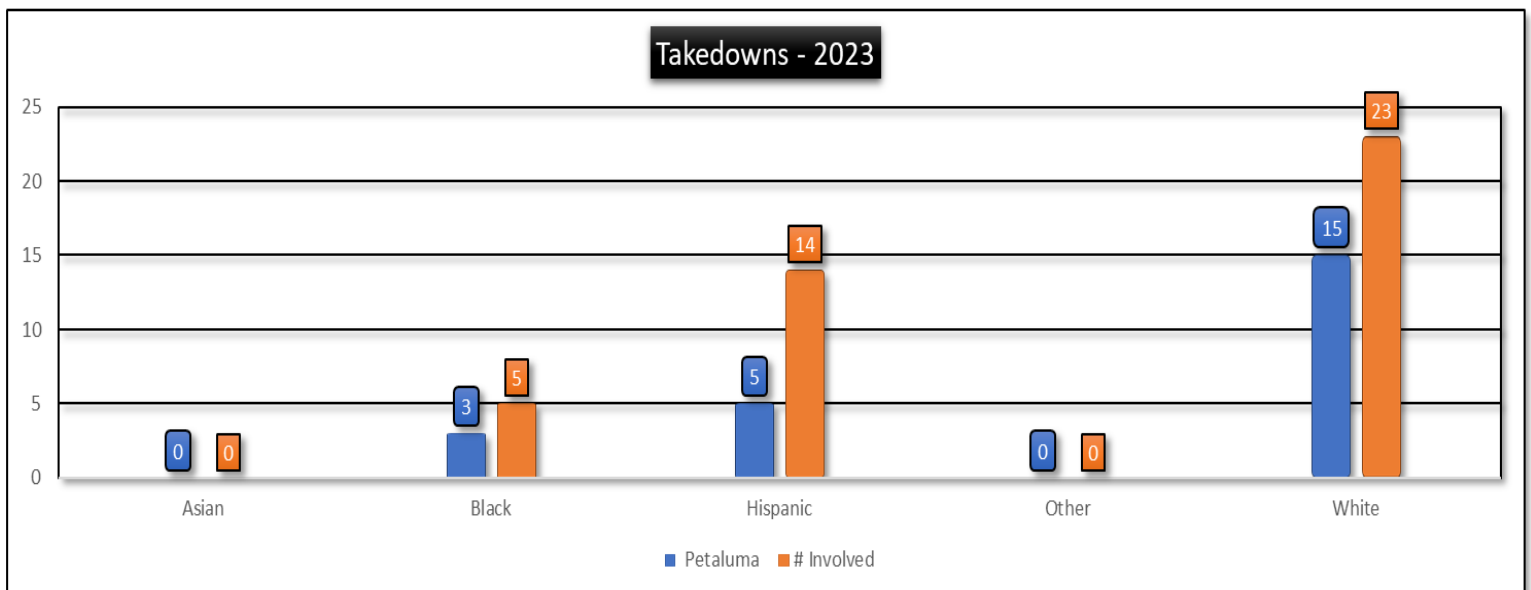
**Chart 8A:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2023** of those individuals who were subject to a **CONTROL HOLD USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



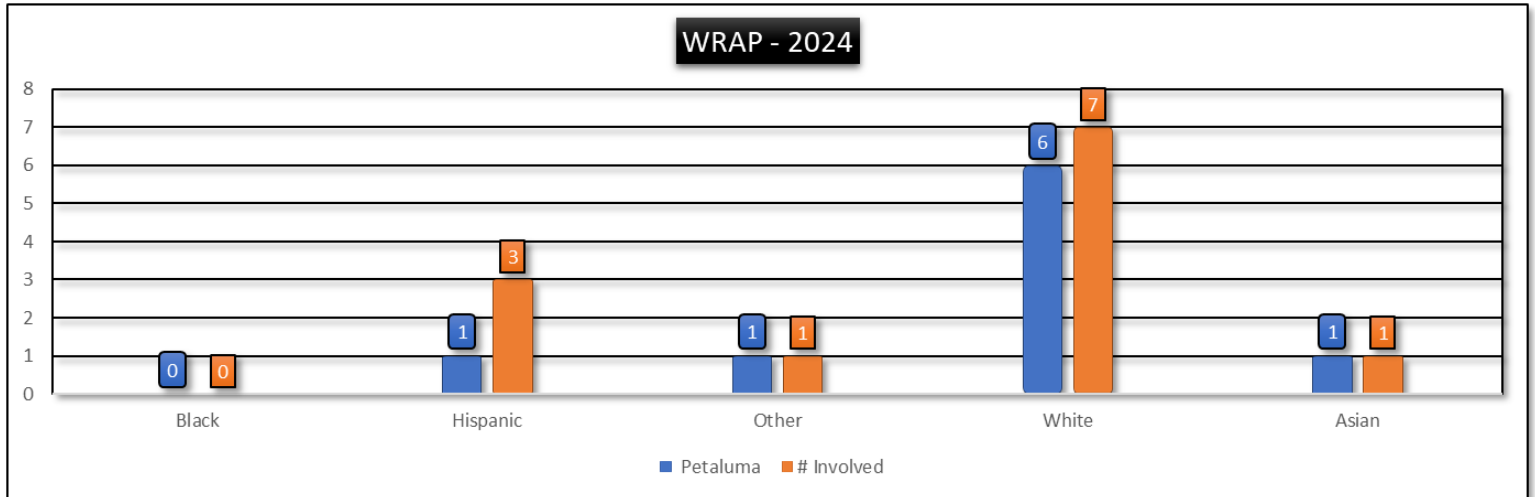
**Chart 9:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2024** of those individuals who were subject to a **TAKEDOWN HOLD USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



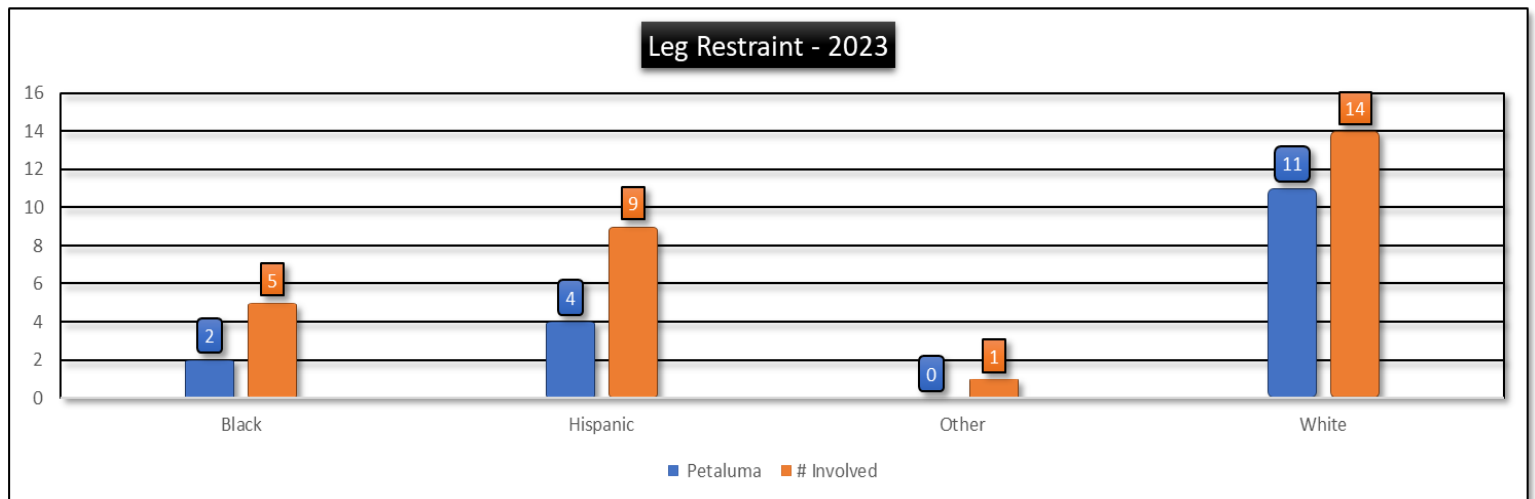
**Chart 9A:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2023** of those individuals who were subject to a **TAKEDOWN HOLD USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



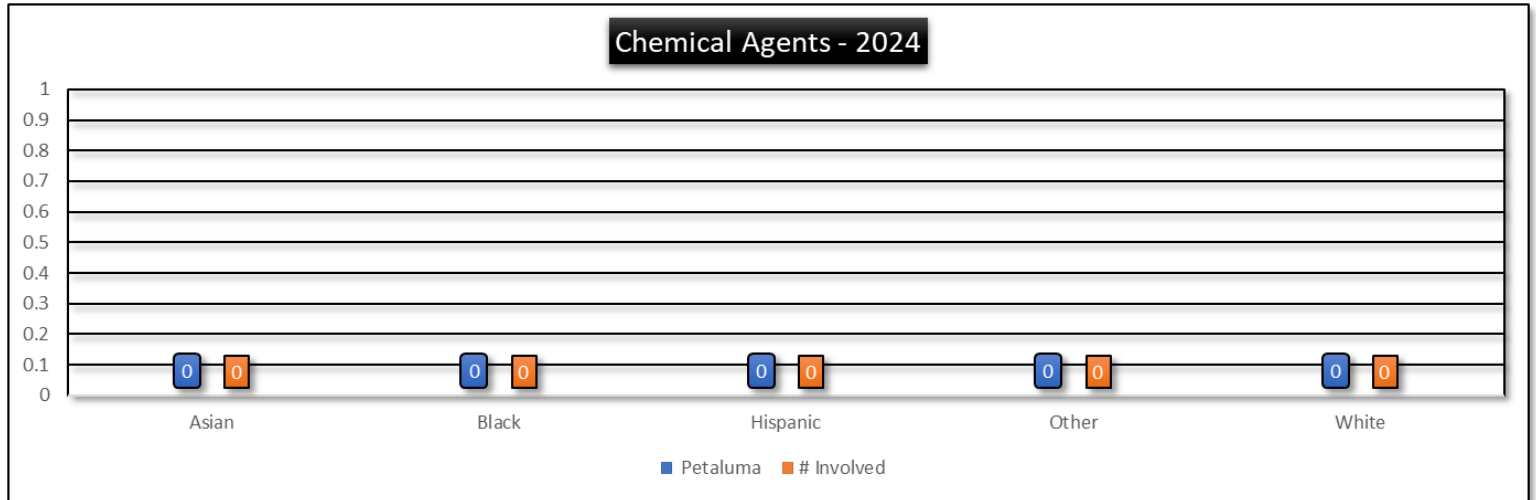
**Chart 10:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2024** of those individuals who were subject to **THE APPLICATION OF A WRAP USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



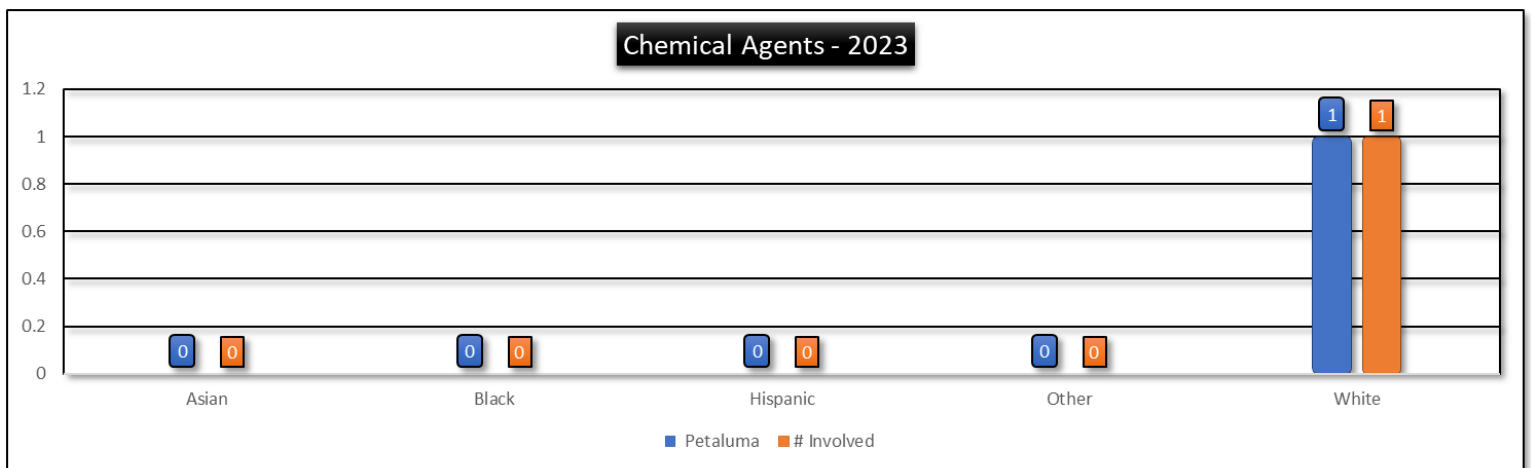
**Chart 10A:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2023** of those individuals who were subject to **THE APPLICATION OF A WRAP USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



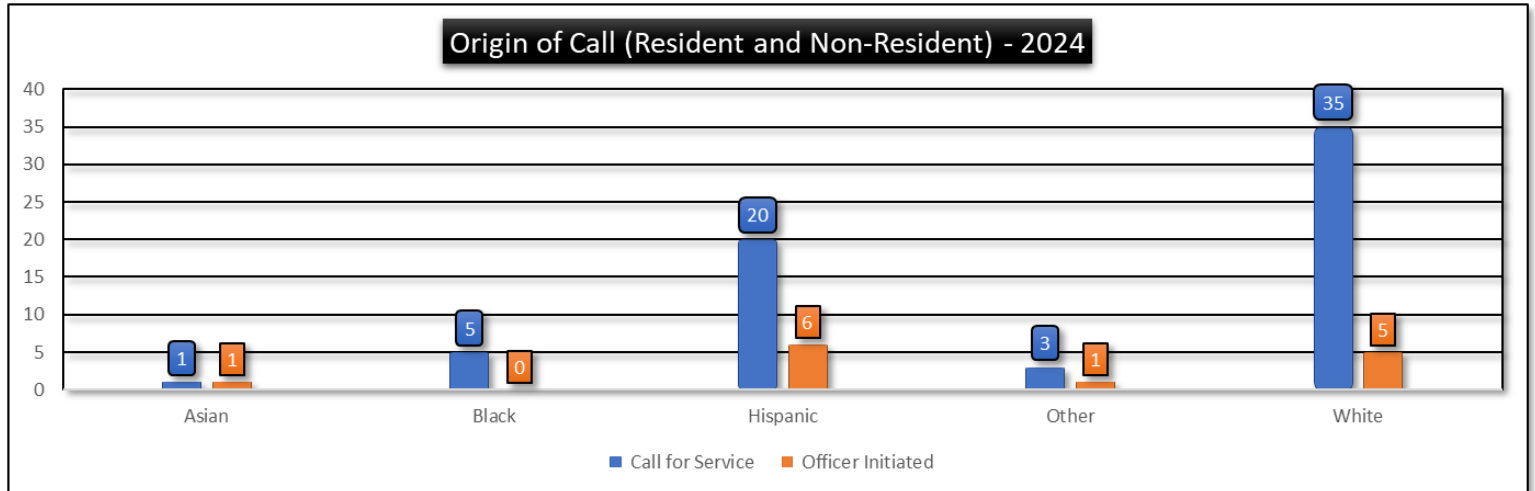
**Chart 11:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2024** of those individuals who were subject to a **CHEMICAL AGENT DISPLAY OR USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



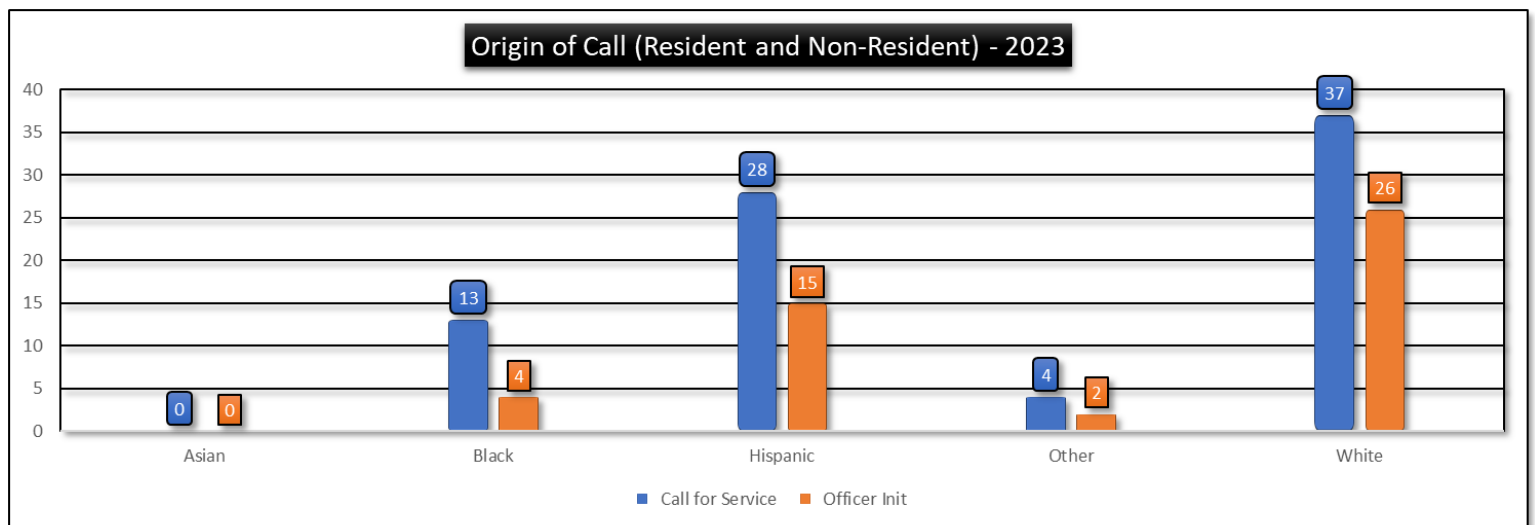
**Chart 11A:** The following chart shows the RACIAL/ETHNIC breakdown for **CY2023** of those individuals who were subject to a **CHEMICAL AGENT DISPLAY OR USE OF FORCE** and the number of such individuals who lived in Petaluma at the time of the incident.



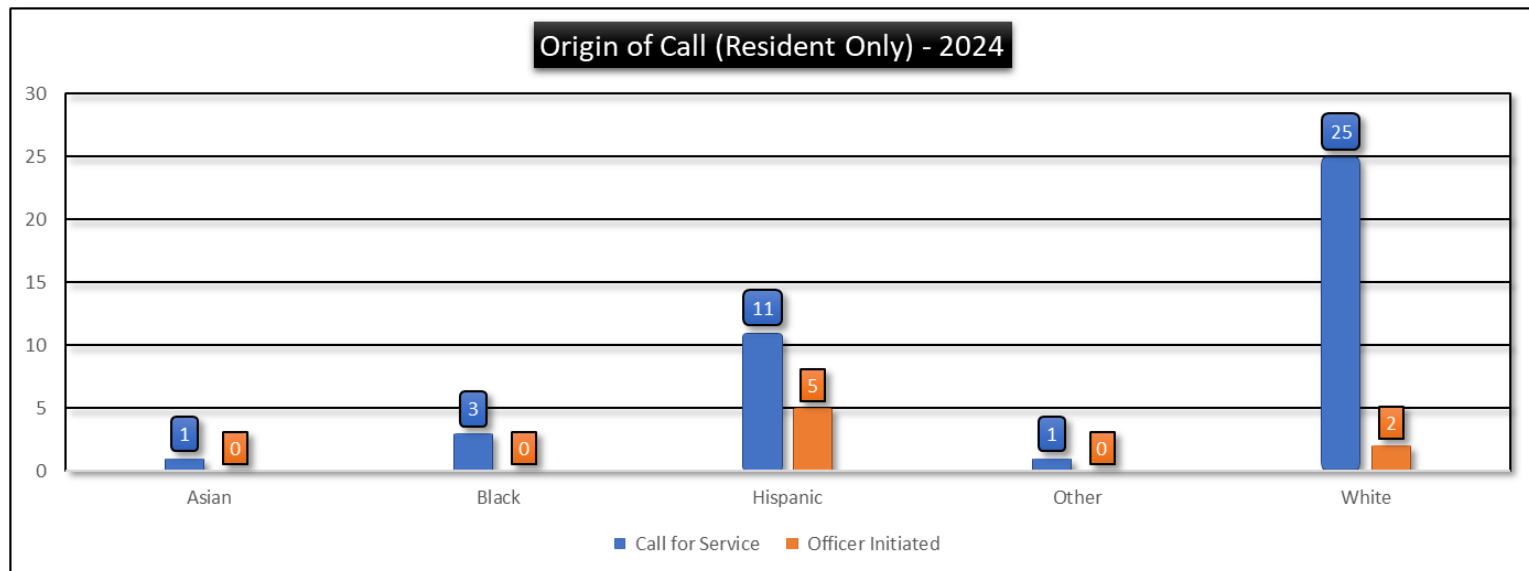
**Chart 12:** The following chart shows the **RACIAL/ETHNIC** breakdown for **CY2024** of the **ORIGIN OF INCIDENT** for those individuals who were subject to a **USE OR DISPLAY OF FORCE** for both residents and non-residents of Petaluma.



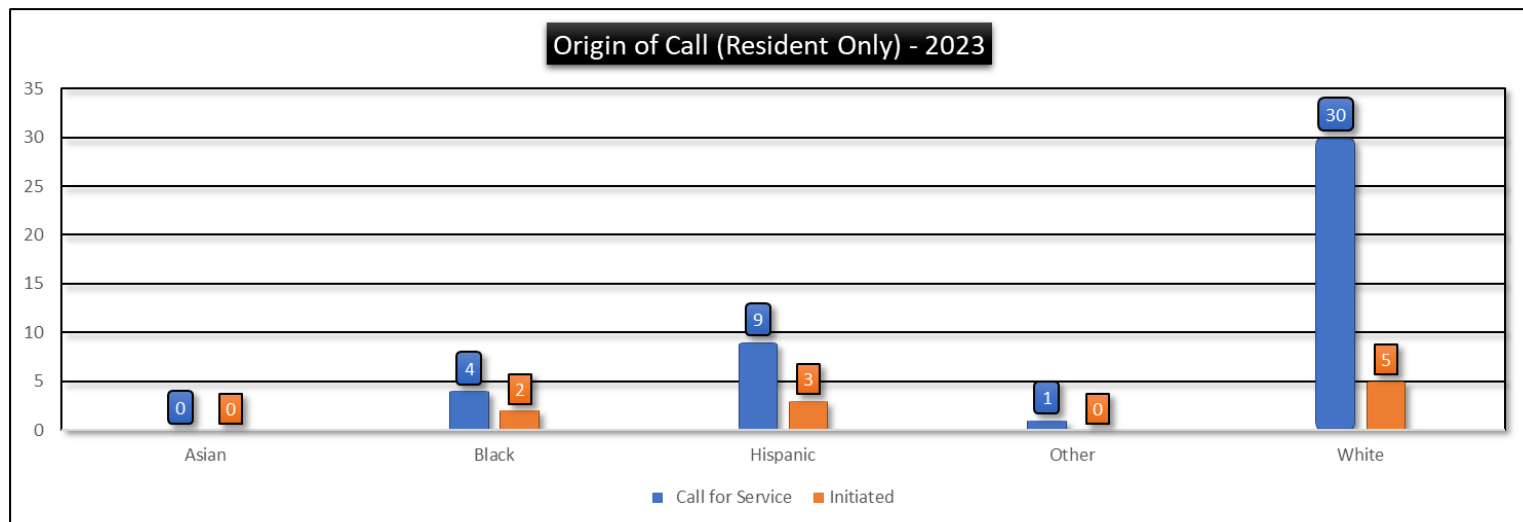
**Chart 12A:** The following chart shows the **RACIAL/ETHNIC** breakdown for **CY2023** of the **ORIGIN OF INCIDENT** for those individuals who were subject to a **USE OR DISPLAY OF FORCE** for both residents and non-residents of Petaluma.



**Chart 13: The following chart shows the RACIAL/ETHNIC breakdown for CY2024 of the ORIGIN OF INCIDENT for those individuals who were subject to a USE OR DISPLAY OF FORCE for only residents of Petaluma.**



**Chart 13A: The following chart shows the RACIAL/ETHNIC breakdown for CY2023 of the ORIGIN OF INCIDENT for those individuals who were subject to a USE OR DISPLAY OF FORCE for only residents of Petaluma**



## APPENDIX D – PHOTOS OF WRAP RESTRAINT DEVICE



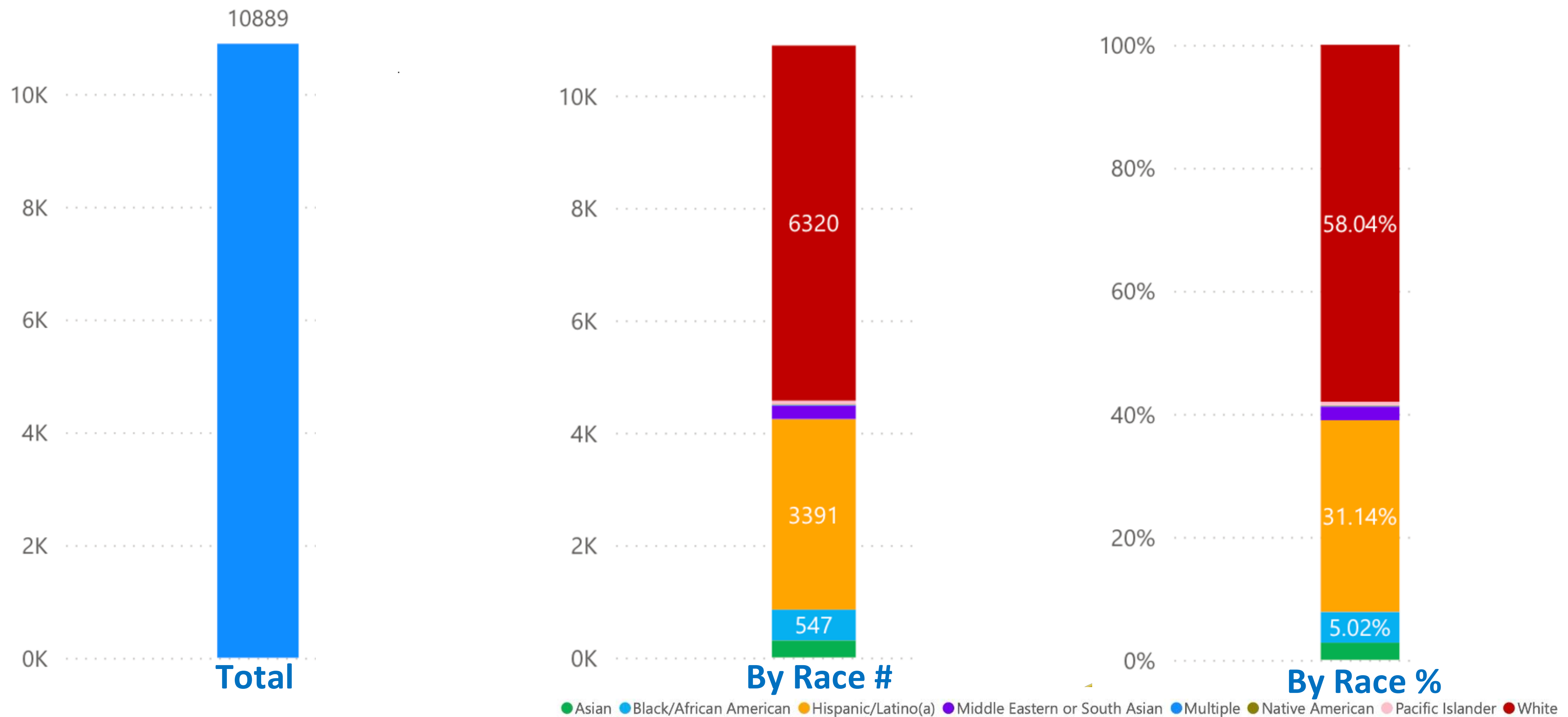
## APPENDIX E – 2023 RIPA DATA

Appendix Begins on Following Page

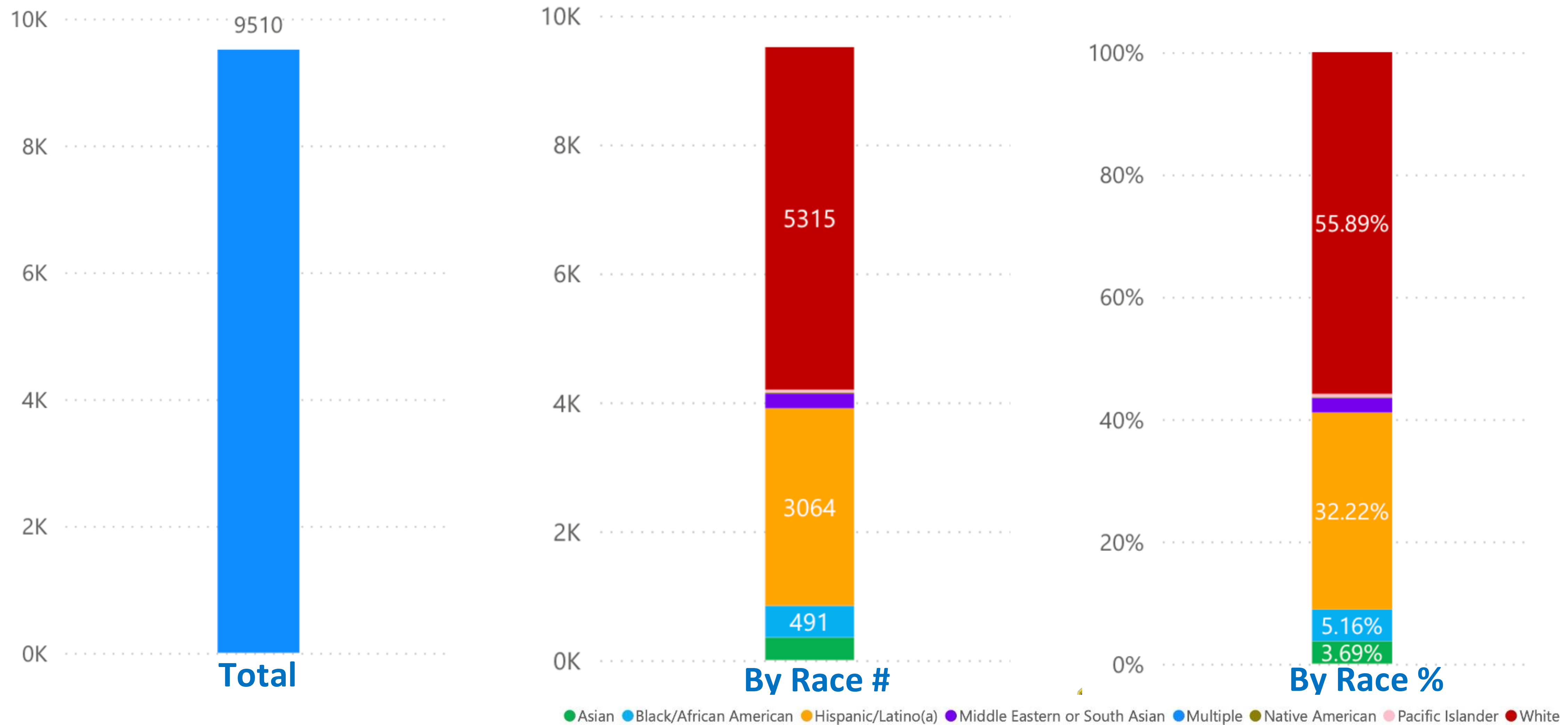
# 2023 and 2024 RIPA DATA



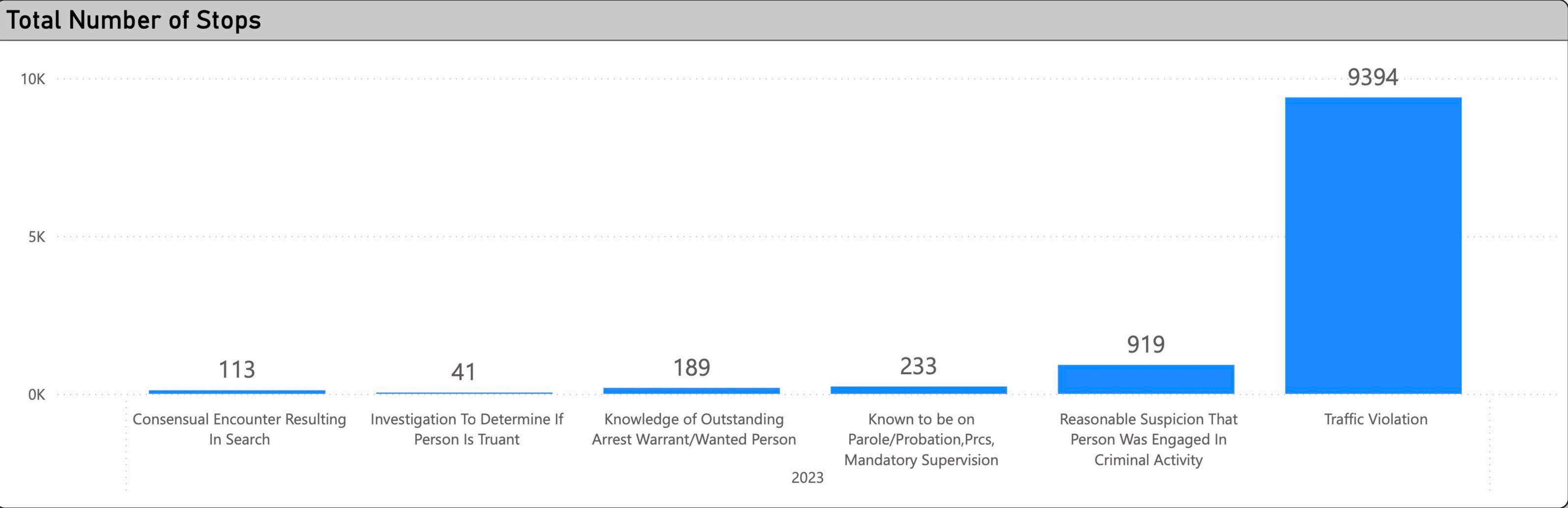
# Total Stops – 2023 (Total, By Race #, By Race %)



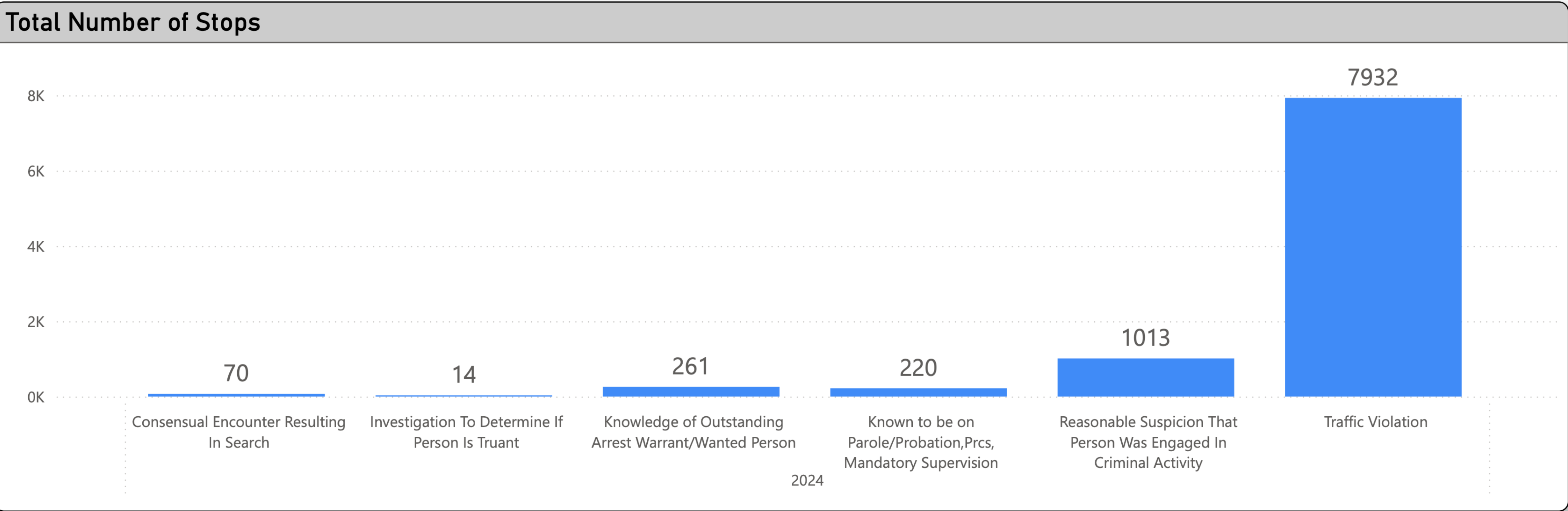
# Total Stops – 2024 (Total, By Race #, By Race %)



# Total Stops – By Category 2023

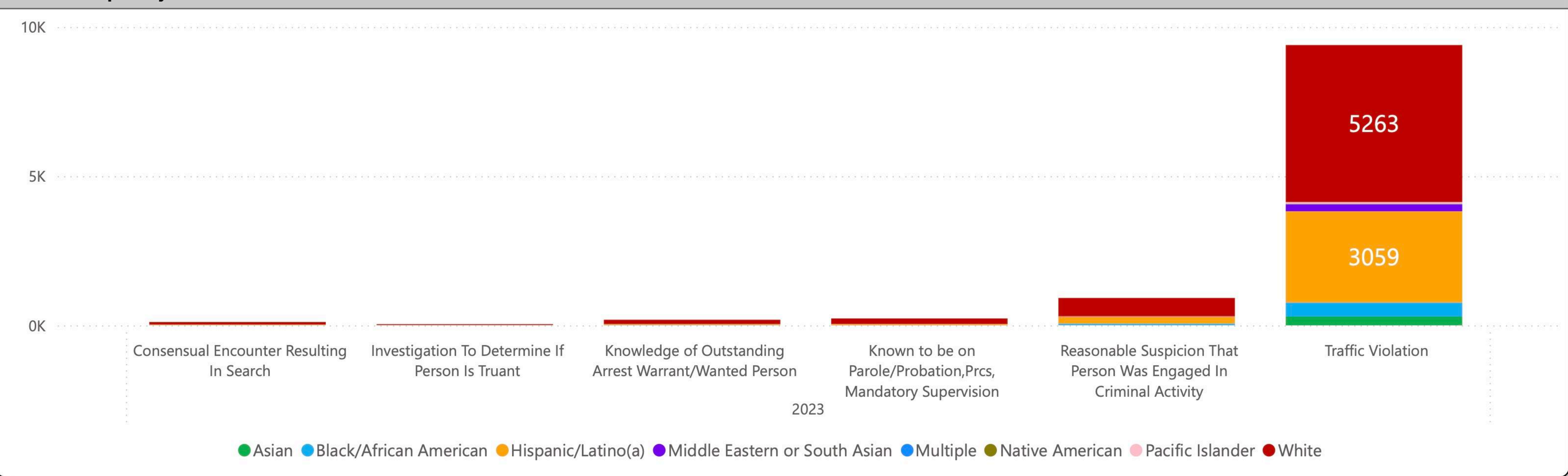


# Total Stops – By Category 2024



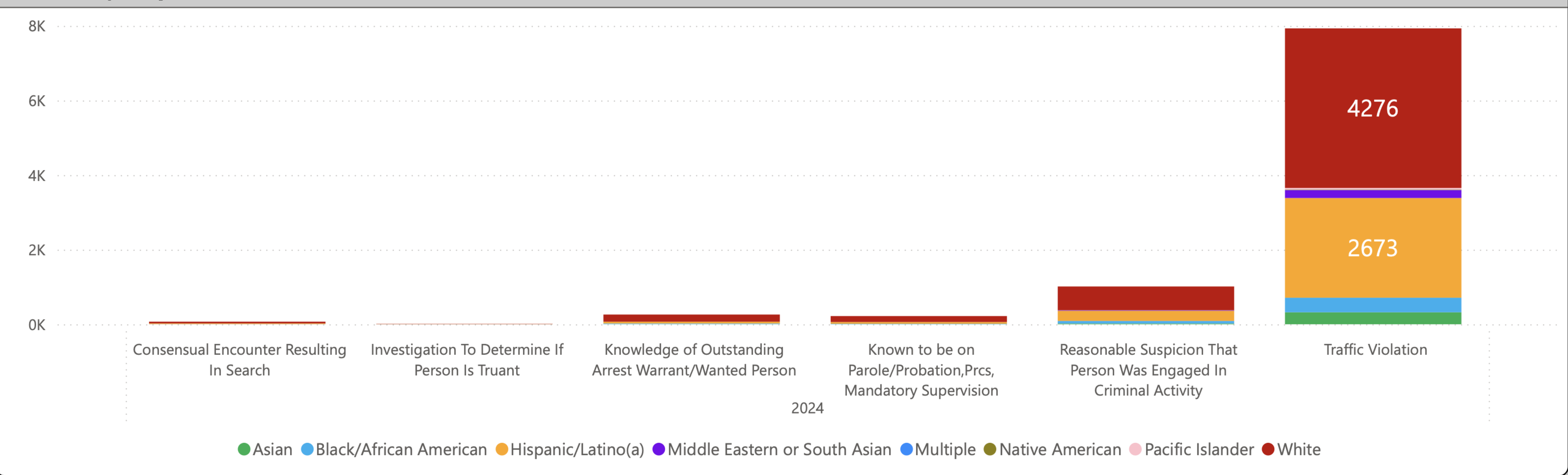
# Total Stops – By Race 2023 (Number)

Total Stops By Race

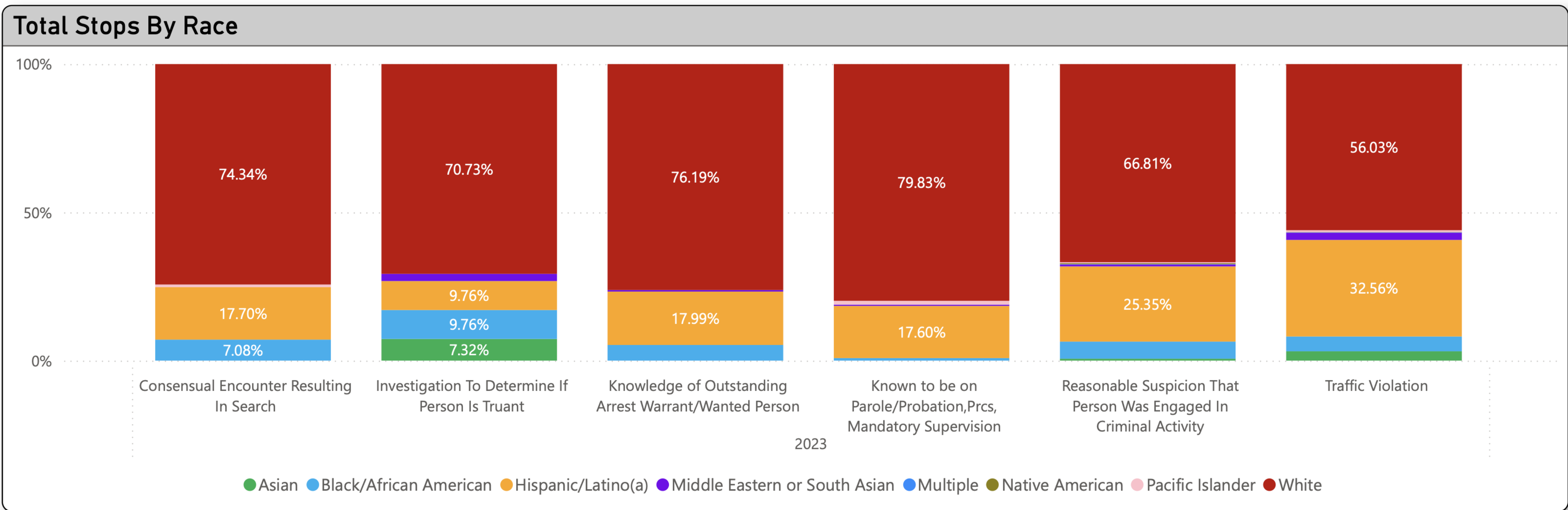


# Total Stops – By Race 2024 (Number)

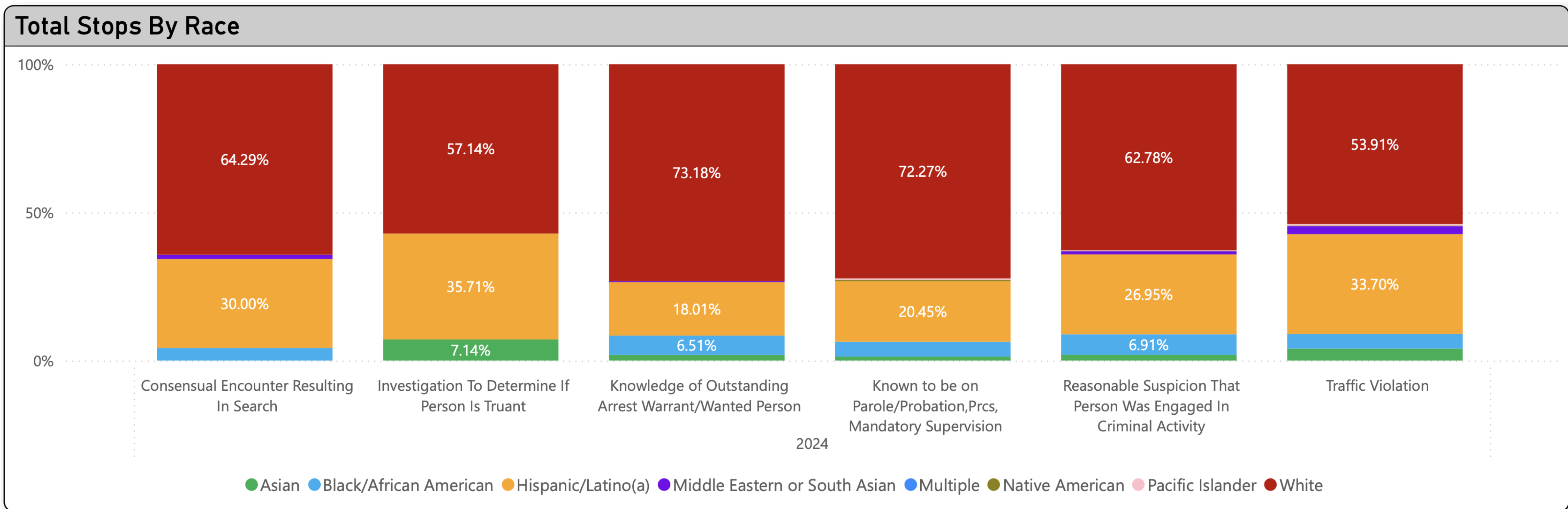
Total Stops By Race



# Total Stops – By Race 2023 (Percentage)



# Total Stops – By Race 2024 (Percentage)



# Total Stops – Full Table with 2023-2024 Data

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**Table appears on next page.**

Please refer to the Review of RIPA Data in the body of the Annual Report for information on the challenges of comparison between 2023 and 2024 data.

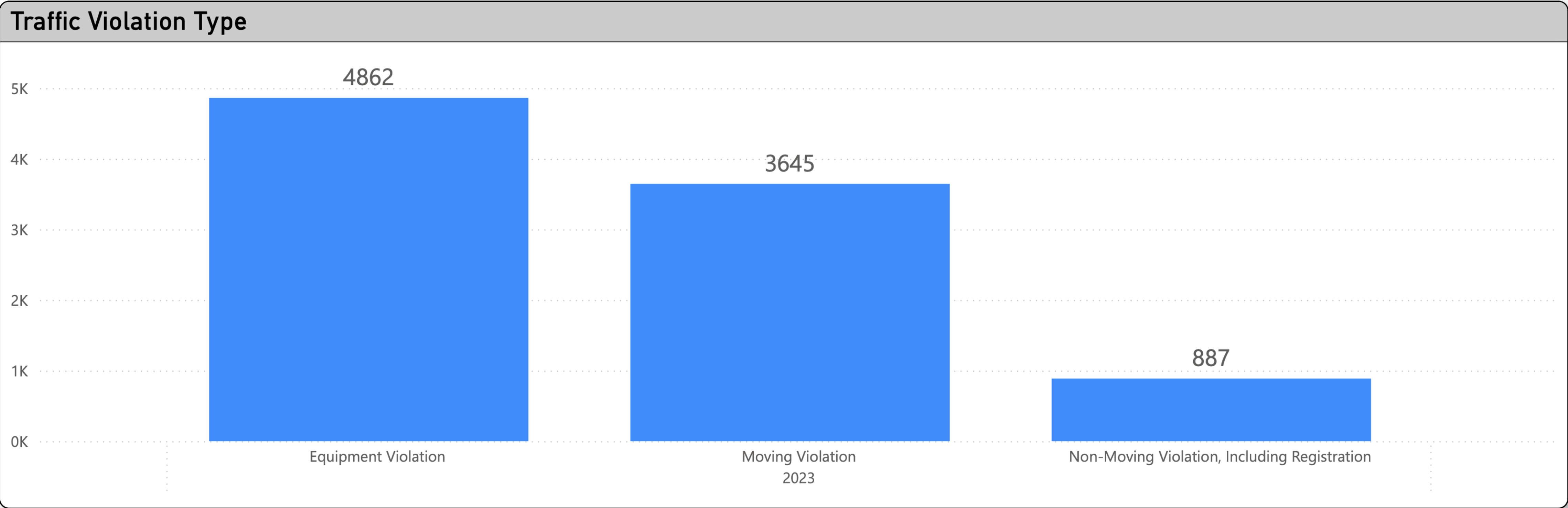


Reason for Stop1	Perceived Race or Ethnicity 1	Perceived Gender 1	2023	2023 %	2024	2024 %
Consensual Encounter Resulting In Search	Total		113	100.00%	70	100.00%
	Black/African American	Total	8	7.08%	3	4.29%
		Male	8	7.08%	3	4.29%
	Hispanic/Latino(a)	Total	20	17.70%	21	30.00%
		Female	2	1.77%	3	4.29%
		Male	18	15.93%	18	25.71%
	Middle Eastern or South Asian	Total			1	1.43%
		Male			1	1.43%
	Pacific Islander	Total	1	0.88%		
		Male	1	0.88%		
Investigation To Determine If Person Is Truant	White	Total	84	74.34%	45	64.29%
		Female	14	12.39%	11	15.71%
		Male	70	61.95%	34	48.57%
	Total		41	100.00%	14	100.00%
	Asian	Total	3	7.32%	1	7.14%
		Male	3	7.32%	1	7.14%
	Black/African American	Total	4	9.76%		
		Male	4	9.76%		
	Hispanic/Latino(a)	Total	4	9.76%	5	35.71%
		Female			1	7.14%
Knowledge of Outstanding Arrest Warrant/Wantec		Male	4	9.76%	4	28.57%
	Middle Eastern or South Asian	Total	1	2.44%		
		Male	1	2.44%		
	White	Total	29	70.73%	8	57.14%
		Female	7	17.07%	1	7.14%
		Male	22	53.66%	7	50.00%
	Total		189	100.00%	261	100.00%
	Asian	Total			5	1.92%
		Male			5	1.92%
	Black/African American	Total	10	5.29%	17	6.51%
Known to be on Parole/Probation,Prcls, Mandatory		Female			4	1.53%
		Male	10	5.29%	13	4.98%
	Hispanic/Latino(a)	Total	34	17.99%	47	18.01%
		Female	4	2.12%	6	2.30%
		Male	30	15.87%	40	15.33%
	Transgender Man/Boy				1	0.38%
	Middle Eastern or South Asian	Total	1	0.53%	1	0.38%
		Male	1	0.53%	1	0.38%
	White	Total	144	76.19%	191	73.18%
		Female	38	20.11%	53	20.31%
Reasonable Suspicion That Person Was Engaged In		Male	106	56.08%	138	52.87%
	Total		233	100.00%	220	100.00%
	Asian	Total			3	1.36%
		Male			3	1.36%
	Black/African American	Total	2	0.86%	11	5.00%
		Female	1	0.43%	2	0.91%
		Male	1	0.43%	9	4.09%
	Hispanic/Latino(a)	Total	41	17.60%	45	20.45%
		Female	2	0.86%	3	1.36%
		Male	39	16.74%	42	19.09%
Reasonable Suspicion That Person Was Engaged In	Middle Eastern or South Asian	Total	1	0.43%		
		Male	1	0.43%		
	Native American	Total			1	0.45%
		Male			1	0.45%
	Pacific Islander	Total	3	1.29%	1	0.45%
		Male	3	1.29%	1	0.45%
	White	Total	186	79.83%	159	72.27%
		Female	24	10.30%	23	10.45%
		Male	162	69.53%	136	61.82%
	Total		919	100.00%	1013	100.00%
Reasonable Suspicion That Person Was Engaged In	Asian	Total	6	0.65%	20	1.97%
		Female	2	0.22%	5	0.49%
		Male	4	0.44%	15	1.48%
	Black/African American	Total	53	5.77%	70	6.91%
		Female	13	1.41%	13	1.28%
		Male	40	4.35%	56	5.53%
	Transgender Man/Boy				1	0.10%
	Hispanic/Latino(a)	Total	233	25.35%	273	26.95%
		Female	37	4.03%	51	5.03%
		Male	196	21.33%	221	21.82%
Reasonable Suspicion That Person Was Engaged In	Transgender Man/Boy				1	0.10%
	Middle Eastern or South Asian	Total	6	0.65%	11	1.09%
		Female			1	0.10%

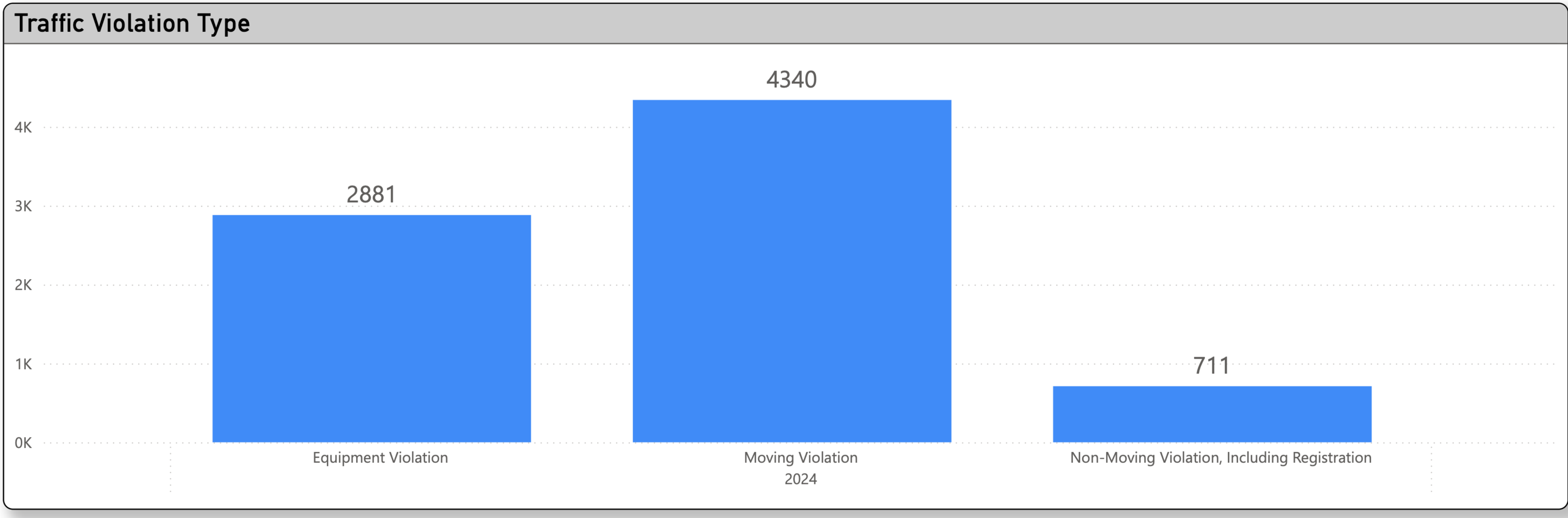
Traffic Violation	Multiple	Male	6	0.65%	10	0.99%
		<b>Total</b>	<b>1</b>	<b>0.11%</b>		
		Male	1	0.11%		
	Native American	<b>Total</b>	<b>3</b>	<b>0.33%</b>	<b>1</b>	<b>0.10%</b>
		Female	1	0.11%		
	Pacific Islander	Male	2	0.22%	1	0.10%
		<b>Total</b>	<b>3</b>	<b>0.33%</b>	<b>2</b>	<b>0.20%</b>
		Male	3	0.33%	2	0.20%
	White	<b>Total</b>	<b>614</b>	<b>66.81%</b>	<b>636</b>	<b>62.78%</b>
		Female	169	18.39%	149	14.71%
		Male	445	48.42%	480	47.38%
		Transgender Man/Boy			4	0.39%
		Transgender Woman/Girl			3	0.30%
	<b>Total</b>		<b>9394</b>	<b>100.00%</b>	<b>7932</b>	<b>100.00%</b>
	Asian	<b>Total</b>	<b>295</b>	<b>3.14%</b>	<b>322</b>	<b>4.06%</b>
		Female	119	1.27%	128	1.61%
		Male	176	1.87%	194	2.45%
	Black/African American	<b>Total</b>	<b>470</b>	<b>5.00%</b>	<b>390</b>	<b>4.92%</b>
		Female	132	1.41%	116	1.46%
		Male	338	3.60%	273	3.44%
		Transgender Man/Boy			1	0.01%
	Hispanic/Latino(a)	<b>Total</b>	<b>3059</b>	<b>32.56%</b>	<b>2673</b>	<b>33.70%</b>
		Female	701	7.46%	699	8.81%
		Male	2355	25.07%	1965	24.77%
		Transgender Man/Boy	3	0.03%	4	0.05%
		Transgender Woman/Girl			5	0.06%
	Middle Eastern or South Asian	<b>Total</b>	<b>230</b>	<b>2.45%</b>	<b>213</b>	<b>2.69%</b>
		Female	40	0.43%	37	0.47%
		Male	190	2.02%	176	2.22%
	Multiple	<b>Total</b>	<b>10</b>	<b>0.11%</b>	<b>1</b>	<b>0.01%</b>
		Female	3	0.03%	1	0.01%
		Male	7	0.07%		
	Native American	<b>Total</b>	<b>9</b>	<b>0.10%</b>	<b>13</b>	<b>0.16%</b>
		Female	4	0.04%	5	0.06%
		Male	5	0.05%	7	0.09%
		Transgender Woman/Girl			1	0.01%
	Pacific Islander	<b>Total</b>	<b>58</b>	<b>0.62%</b>	<b>44</b>	<b>0.55%</b>
		Female	23	0.24%	13	0.16%
		Male	35	0.37%	31	0.39%
	White	<b>Total</b>	<b>5263</b>	<b>56.03%</b>	<b>4276</b>	<b>53.91%</b>
			2	0.02%		
		Female	1919	20.43%	1478	18.63%
		Male	3337	35.52%	2781	35.06%
		Transgender Man/Boy	4	0.04%	13	0.16%
		Transgender Woman/Girl	1	0.01%	4	0.05%
<b>Total</b>			<b>10889</b>	<b>100.00%</b>	<b>9510</b>	<b>100.00%</b>

Applied filters:Year is 2023 or 2024

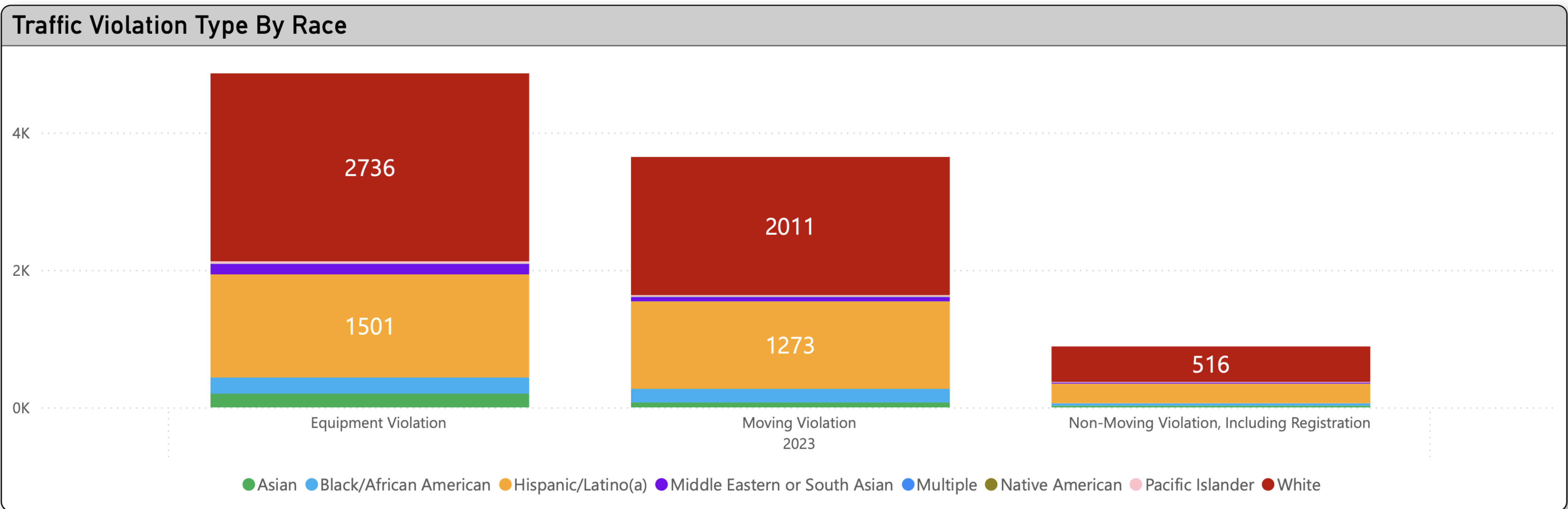
# Traffic Stops – 2023 (Number)



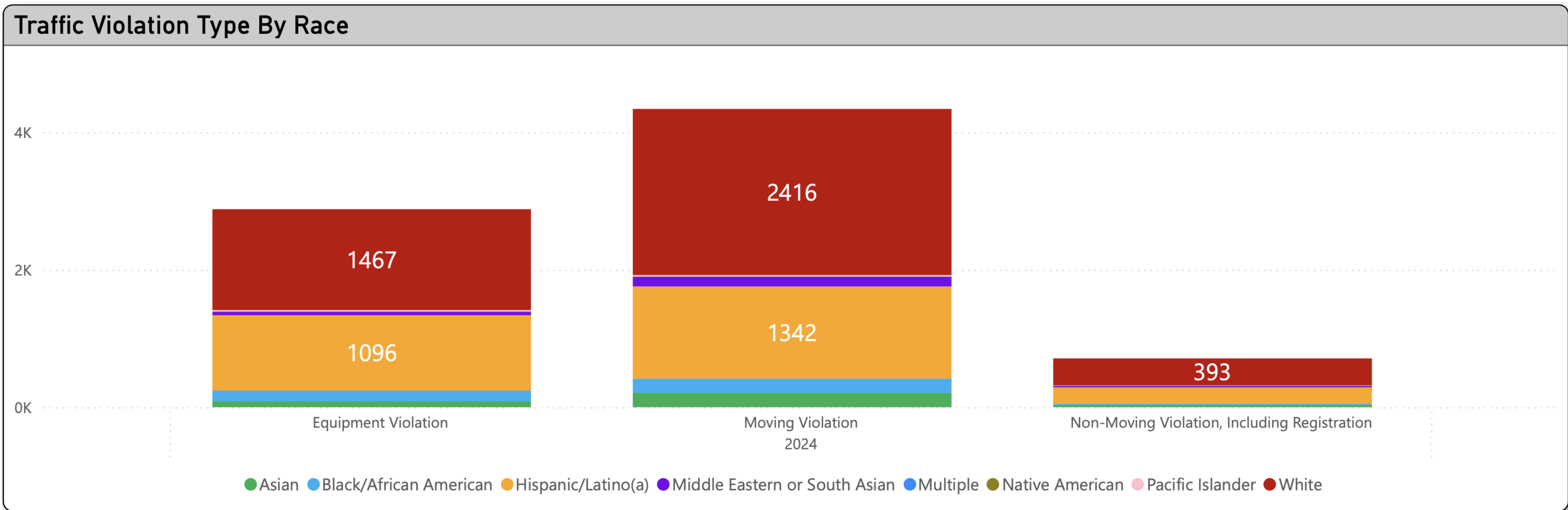
# Traffic Stops – 2024 (Number)



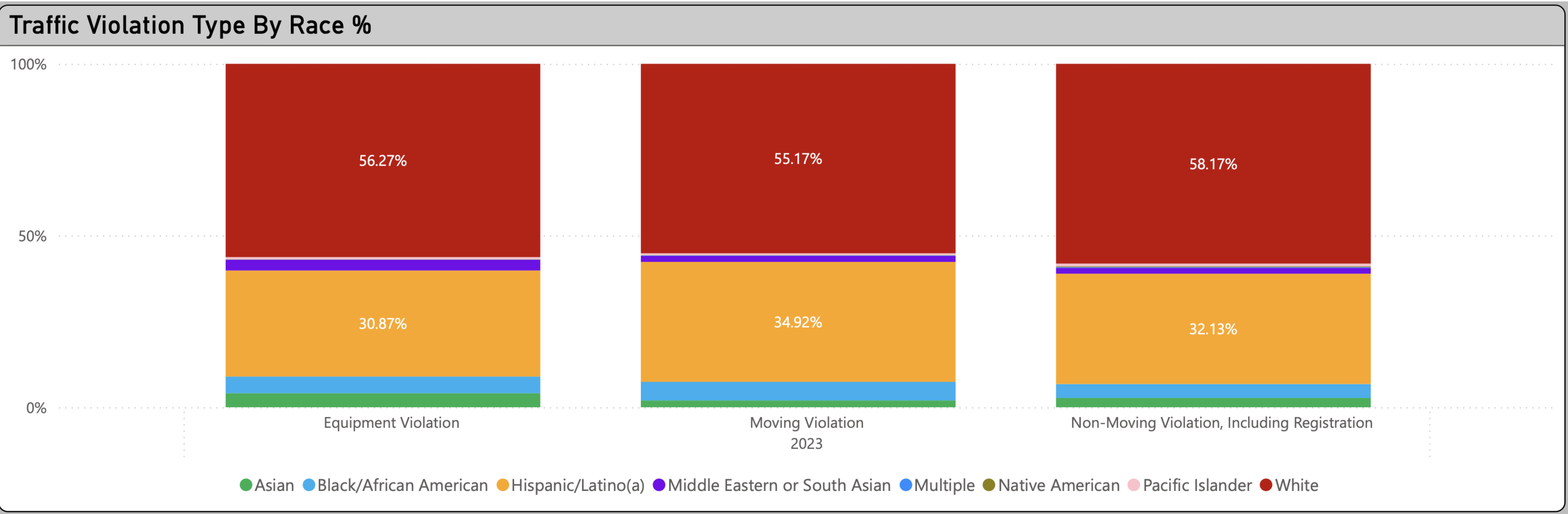
# Traffic Stops – By Race 2023 (Number)



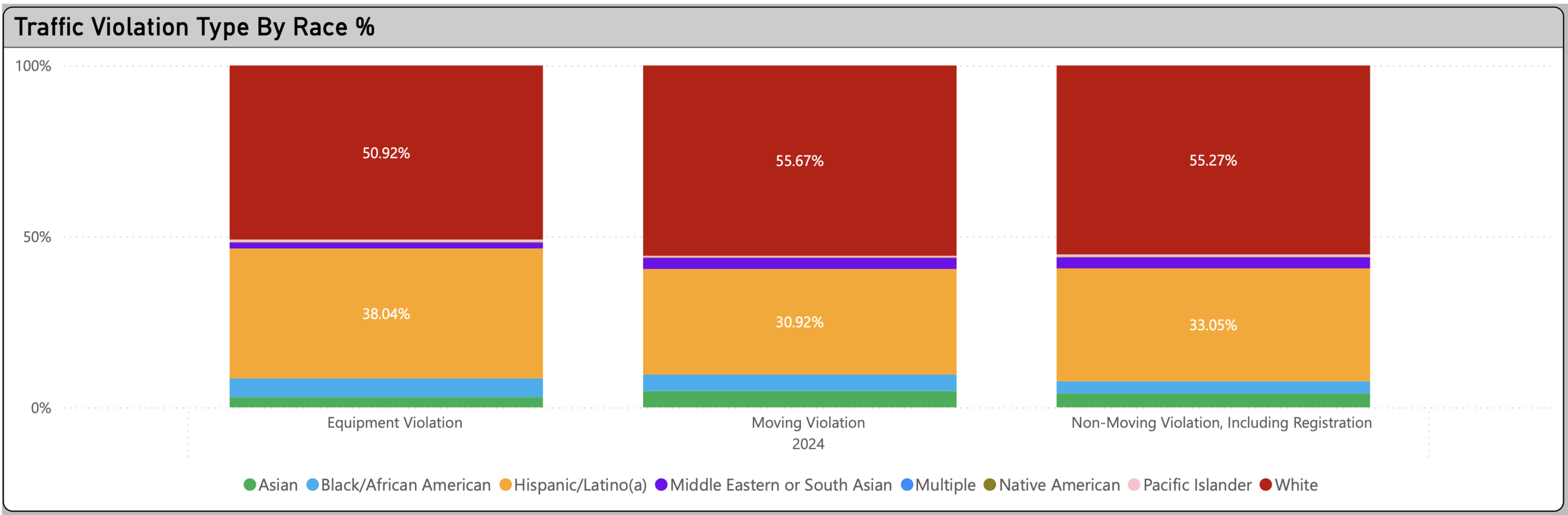
# Traffic Stops – By Race 2024 (Number)



# Traffic Stops – By Race 2023 (Percentage)



# Traffic Stops – By Race 2024 (Percentage)



# Traffic Stops – Full Table with 2023-2024 Data

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**Table appears on next page.**

Please refer to the Review of RIPA Data in the body of the Annual Report for information on the challenges of comparison between 2023 and 2024 data.

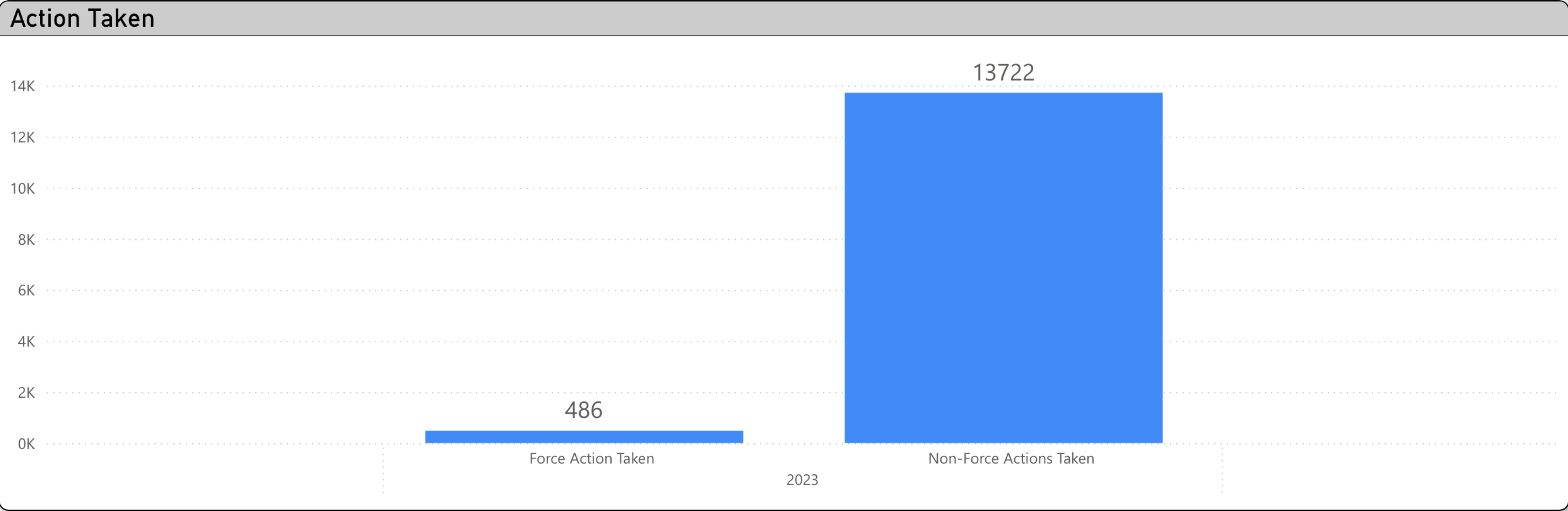


Traffic Violation Type1	Perceived Race or Ethnicity 1	Perceived Gender 1	2023 Traffic	2023 Traffic	2024 Traffic	2024 Traffic
			No	%	No	%
Equipment Violation	Total		4862	100%	2881	100.00%
	Asian	Total	199	4%	86	2.99%
		Female	83	2%	28	0.97%
		Male	116	2%	58	2.01%
	Black/African American	Total	236	5%	157	5.45%
		Female	57	1%	54	1.87%
		Male	179	4%	102	3.54%
		Transgender Man/Boy			1	0.03%
	Hispanic/Latino(a)	Total	1501	31%	1096	38.04%
		Female	357	7%	260	9.02%
		Male	1144	24%	831	28.84%
		Transgender Man/Boy			1	0.03%
		Transgender Woman/Girl			4	0.14%
	Middle Eastern or South Asian	Total	152	3%	49	1.70%
		Female	26	1%	10	0.35%
		Male	126	3%	39	1.35%
	Multiple	Total	3	0%	1	0.03%
		Female	1	0%	1	0.03%
		Male	2	0%		
	Native American	Total	4	0%	5	0.17%
		Female	2	0%	2	0.07%
		Male	2	0%	3	0.10%
	Pacific Islander	Total	31	1%	20	0.69%
		Female	11	0%	10	0.35%
		Male	20	0%	10	0.35%
	White	Total	2736	56%	1467	50.92%
		Female	2	0%		
		Male	970	20%	486	16.87%
		Male	1761	36%	976	33.88%
		Transgender Man/Boy	2	0%	3	0.10%
		Transgender Woman/Girl	1	0%	2	0.07%
Moving Violation	Total		3645	100%	4340	100.00%
	Asian	Total	72	2%	207	4.77%
		Female	26	1%	84	1.94%
		Male	46	1%	123	2.83%
	Black/African American	Total	198	5%	208	4.79%
		Female	64	2%	55	1.27%
		Male	134	4%	153	3.53%
	Hispanic/Latino(a)	Total	1273	35%	1342	30.92%
		Female	260	7%	369	8.50%
		Male	1010	28%	969	22.33%
		Transgender Man/Boy	3	0%	3	0.07%
		Transgender Woman/Girl			1	0.02%
	Middle Eastern or South Asian	Total	63	2%	141	3.25%
		Female	8	0%	23	0.53%
		Male	55	2%	118	2.72%
	Multiple	Total	5	0%		
		Female	1	0%		
		Male	4	0%		
	Native American	Total	3	0%	7	0.16%
		Female	2	0%	2	0.05%
		Male	1	0%	4	0.09%
		Transgender Woman/Girl			1	0.02%
	Pacific Islander	Total	20	1%	19	0.44%
		Female	7	0%	3	0.07%
		Male	13	0%	16	0.37%
	White	Total	2011	55%	2416	55.67%
		Female	718	20%	828	19.08%
		Male	1291	35%	1579	36.38%
		Transgender Man/Boy	2	0%	7	0.16%
		Transgender Woman/Girl			2	0.05%
Non-Moving Violation, Including Registration	Total		887	100%	711	100.00%
	Asian	Total	24	3%	29	4.08%
		Female	10	1%	16	2.25%
		Male	14	2%	13	1.83%
	Black/African American	Total	36	4%	25	3.52%
		Female	11	1%	7	0.98%
		Male	25	3%	18	2.53%
	Hispanic/Latino(a)	Total	285	32%	235	33.05%
		Female	84	9%	70	9.85%

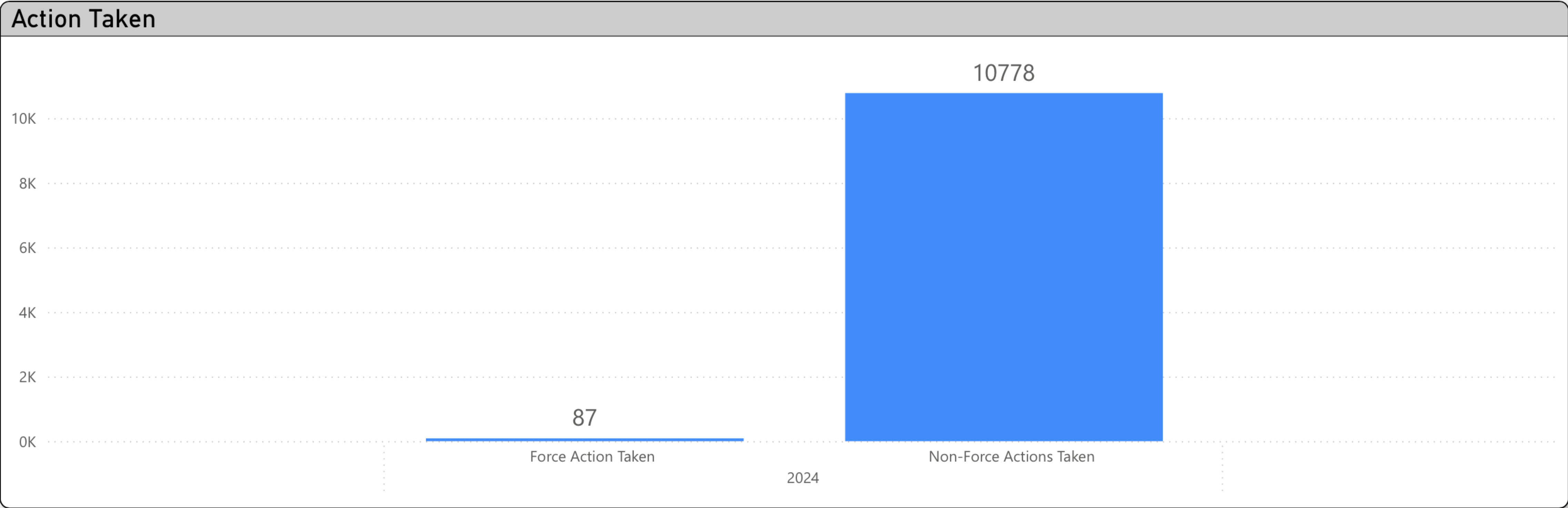
	Male	201	23%	165	23.21%
Middle Eastern or South Asian	<b>Total</b>	<b>15</b>	<b>2%</b>	<b>23</b>	<b>3.23%</b>
	Female	6	1%	4	0.56%
	Male	9	1%	19	2.67%
Multiple	<b>Total</b>	<b>2</b>	<b>0%</b>		
	Female	1	0%		
	Male	1	0%		
Native American	<b>Total</b>	<b>2</b>	<b>0%</b>	<b>1</b>	<b>0.14%</b>
	Female			1	0.14%
	Male	2	0%		
Pacific Islander	<b>Total</b>	<b>7</b>	<b>1%</b>	<b>5</b>	<b>0.70%</b>
	Female	5	1%		
	Male	2	0%	5	0.70%
White	<b>Total</b>	<b>516</b>	<b>58%</b>	<b>393</b>	<b>55.27%</b>
	Female	231	26%	164	23.07%
	Male	285	32%	226	31.79%
	Transgender Man/Boy			3	0.42%
<b>Total</b>		<b>9394</b>	<b>100%</b>	<b>7932</b>	<b>100.00%</b>

Applied filters:Year is 2023 or 2024

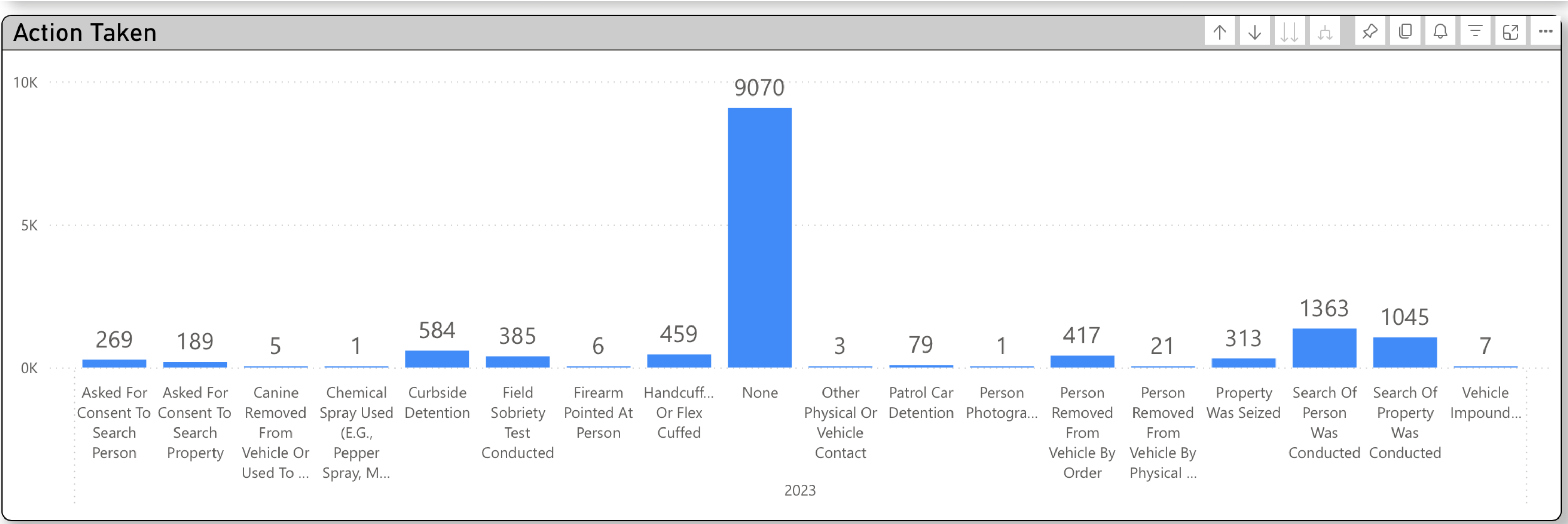
# Action Taken – 2023 (Force/Non Force Number)



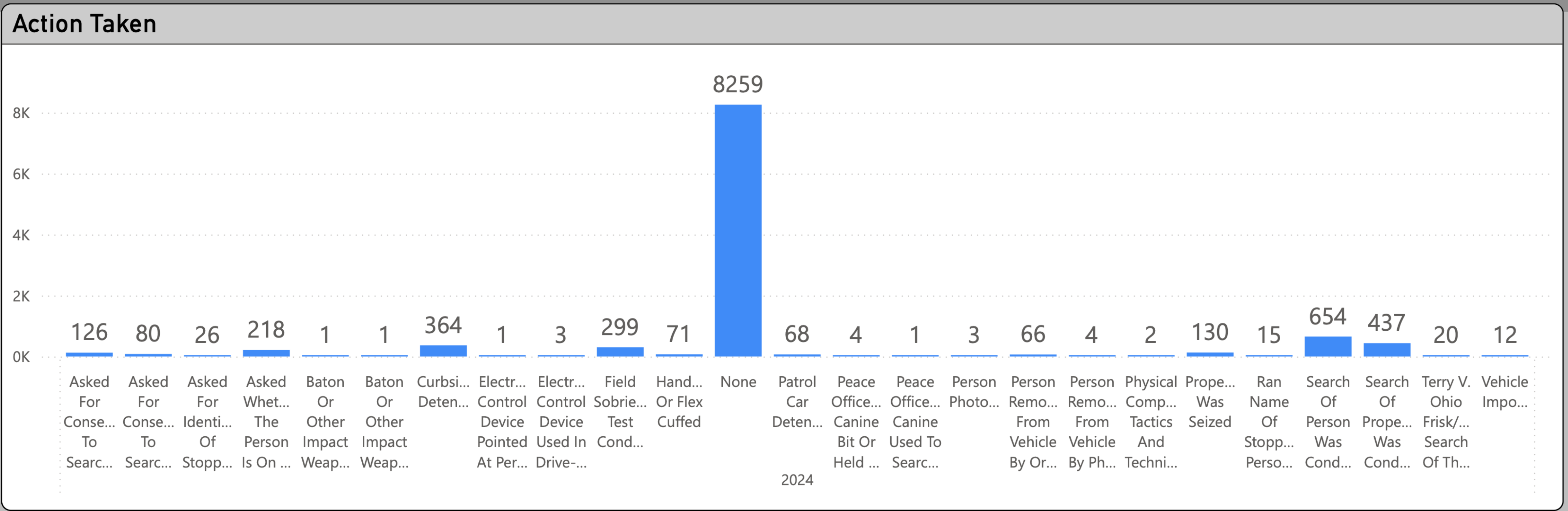
# Action Taken – 2024 (Force/Non Force Number)



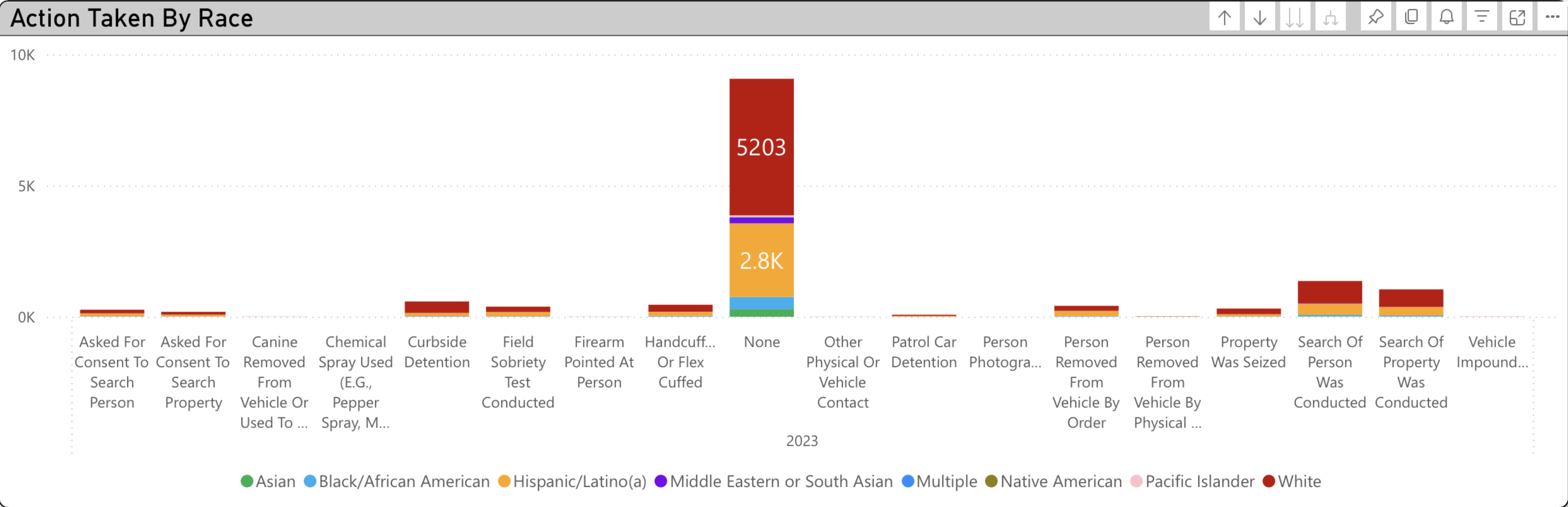
# Action Taken – 2023 (Number)



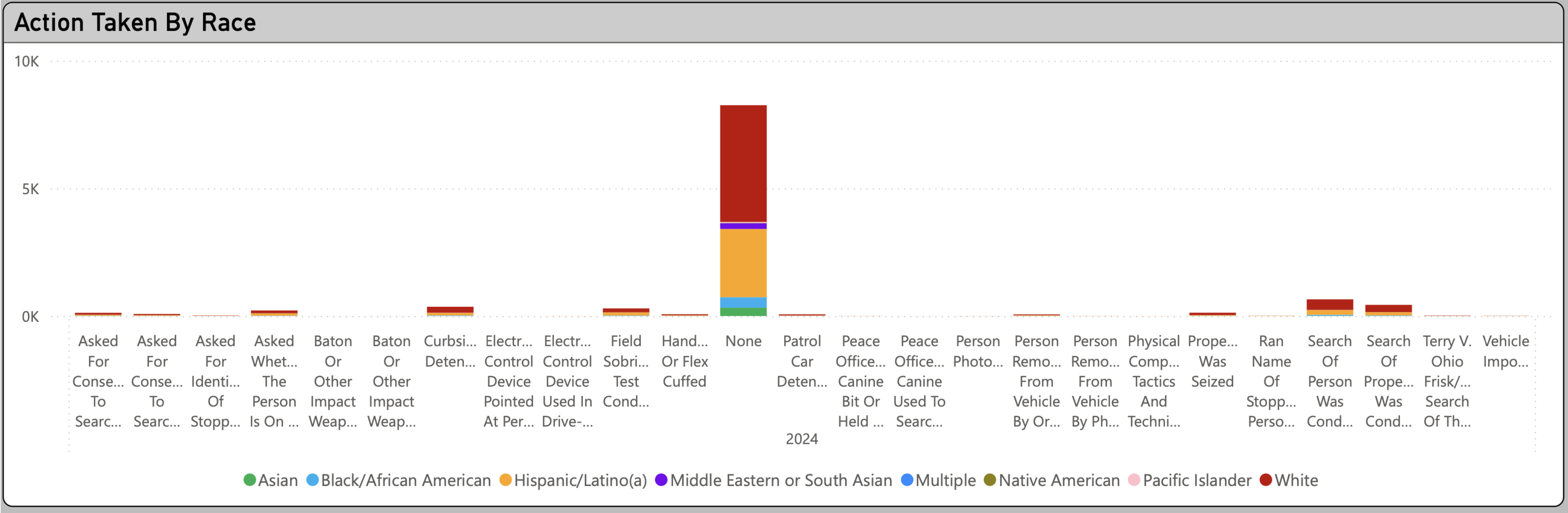
# Action Taken – 2024 (Number)



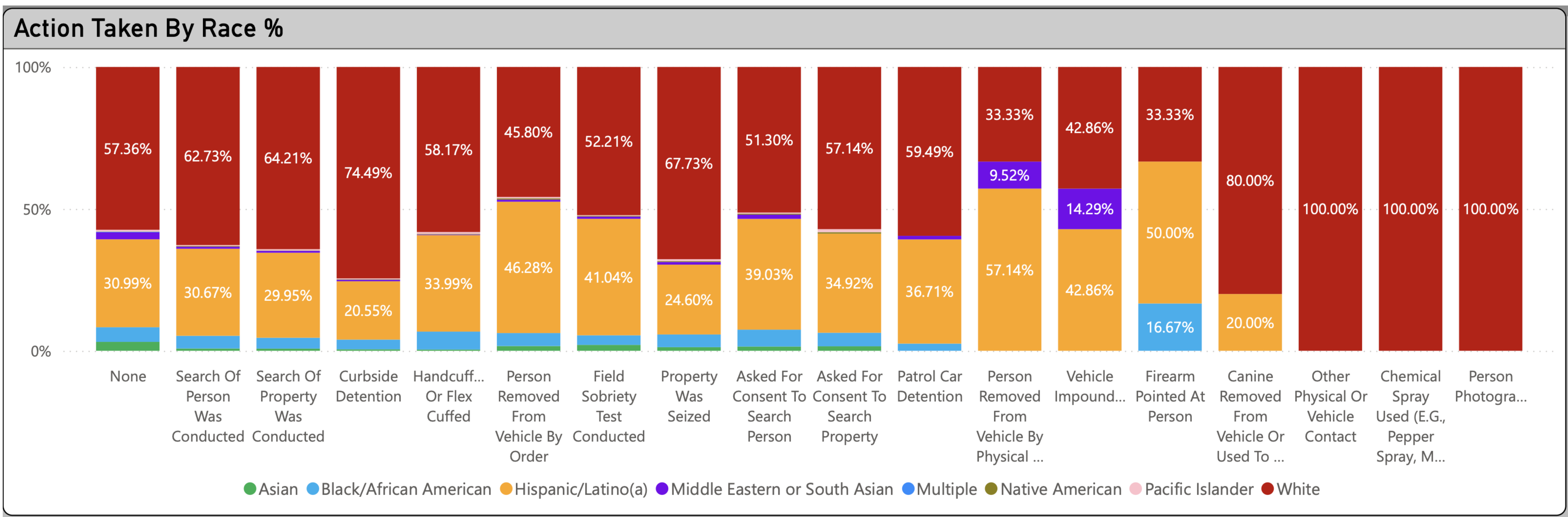
# Action Taken – By Race 2023 (Number)



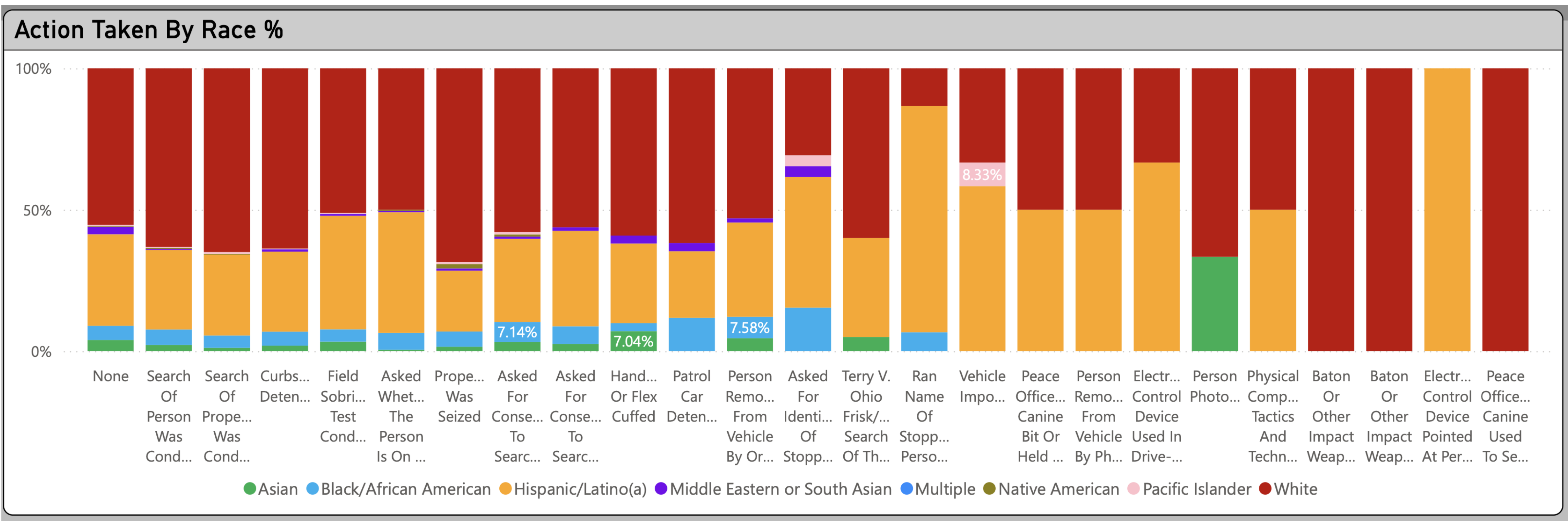
# Action Taken – By Race 2024 (Number)



# Action Taken – By Race 2023 (Percentage)



# Action Taken – By Race 2024 (Percentage)



# Action Taken – Full Table with 2023-2024 Data

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**Table appears on next page.**

Please refer to the Review of RIPA Data in the body of the Annual Report for information on the challenges of comparison between 2023 and 2024 data.

Action Taken 1	Perceived Race or Ethnicity 1	Perceived Gender 1	2023 Action		2024 Action	
			2023	%	2024	%
Asked For Consent To Search Person	Total		269	100.00%	126	100.00%
	Asian	Total	4	1.49%	4	3.17%
		Female	1	0.37%		
		Male	3	1.12%	4	3.17%
	Black/African American	Total	16	5.95%	9	7.14%
		Female			2	1.59%
		Male	16	5.95%	7	5.56%
	Hispanic/Latino(a)	Total	105	39.03%	37	29.37%
		Female	9	3.35%	2	1.59%
		Male	96	35.69%	33	26.19%
		Transgender Man/Boy			1	0.79%
		Transgender Woman/Girl			1	0.79%
	Middle Eastern or South Asian	Total	4	1.49%	1	0.79%
		Female	1	0.37%		
		Male	3	1.12%	1	0.79%
	Native American	Total	1	0.37%	1	0.79%
		Male	1	0.37%	1	0.79%
	Pacific Islander	Total	1	0.37%	1	0.79%
		Male	1	0.37%	1	0.79%
	White	Total	138	51.30%	73	57.94%
		Female	27	10.04%	12	9.52%
		Male	111	41.26%	60	47.62%
		Transgender Woman/Girl			1	0.79%
Asked For Consent To Search Property	Total		189	100.00%	80	100.00%
	Asian	Total	3	1.59%	2	2.50%
		Male	3	1.59%	2	2.50%
	Black/African American	Total	9	4.76%	5	6.25%
		Female			3	3.75%
		Male	9	4.76%	2	2.50%
	Hispanic/Latino(a)	Total	66	34.92%	27	33.75%
		Female	8	4.23%	2	2.50%
		Male	58	30.69%	25	31.25%
	Middle Eastern or South Asian	Total			1	1.25%
		Male			1	1.25%
	Native American	Total	1	0.53%		
		Male	1	0.53%		
	Pacific Islander	Total	2	1.06%		
		Male	2	1.06%		
	White	Total	108	57.14%	45	56.25%
		Female	31	16.40%	14	17.50%
		Male	77	40.74%	31	38.75%
Asked For Identification Of Stopped Person'S Passenger	Total				26	100.00%
	Black/African American	Total			4	15.38%
		Female			2	7.69%
		Male			2	7.69%
	Hispanic/Latino(a)	Total			12	46.15%
		Female			4	15.38%
		Male			8	30.77%
	Middle Eastern or South Asian	Total			1	3.85%
		Male			1	3.85%
	Pacific Islander	Total			1	3.85%
		Male			1	3.85%
	White	Total			8	30.77%
		Female			2	7.69%
		Male			6	23.08%
Asked Whether The Person Is On Parole, Probation, Prcs, Or Some Other Form Of Mandatory Supervision	Total				218	100.00%
	Asian	Total			1	0.46%
		Male			1	0.46%
	Black/African American	Total			13	5.96%
		Female			4	1.83%
		Male			9	4.13%
	Hispanic/Latino(a)	Total			93	42.66%
		Female			16	7.34%
		Male			77	35.32%
	Middle Eastern or South Asian	Total			1	0.46%
		Male			1	0.46%
	Native American	Total			1	0.46%
		Female			1	0.46%
	White	Total			109	50.00%
		Female			20	9.17%
		Male			89	40.83%
Baton Or Other Impact Weapon Drawn	Total				1	100.00%

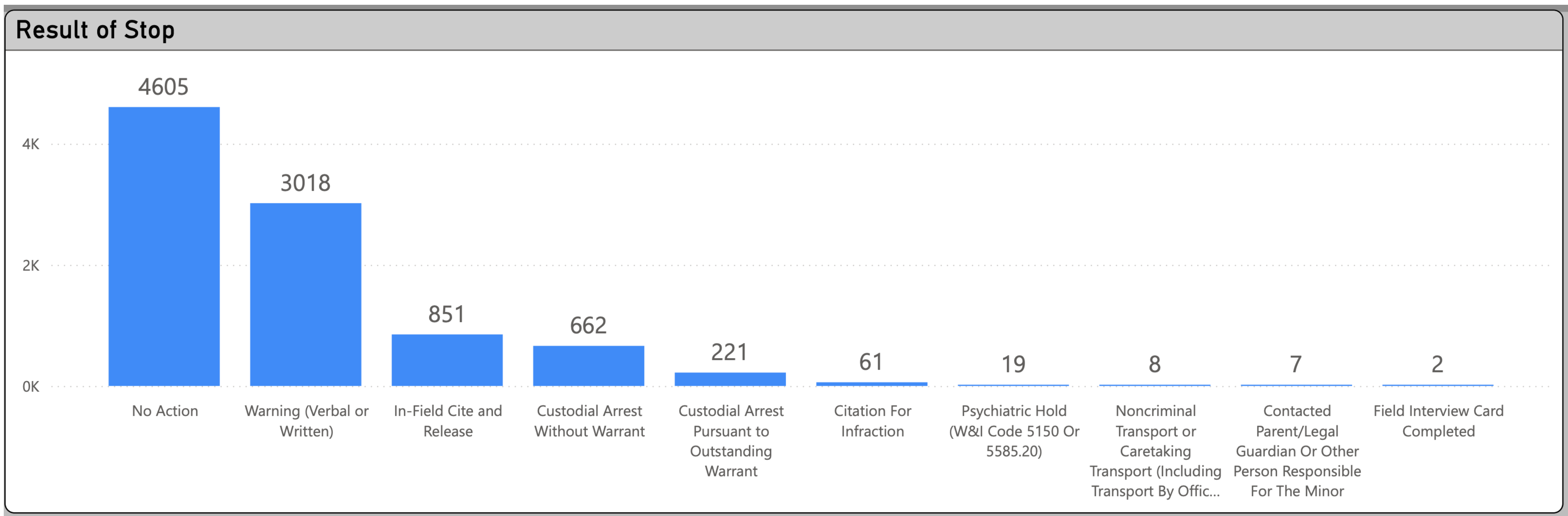
Baton Or Other Impact Weapon Used Or Other Object (Including A Firearm) To Strike Or Prod	White	Total			1	100.00%
		Male			1	100.00%
	Total				1	100.00%
Canine Removed From Vehicle Or Used To Search	White	Total			1	100.00%
		Male			1	100.00%
	Total		5	100.00%		
	Hispanic/Latino(a)	Total	1	20.00%		
		Male	1	20.00%		
	White	Total	4	80.00%		
		Female	1	20.00%		
		Male	3	60.00%		
Chemical Spray Used (E.G., Pepper Spray, Mace Or Other Chemicals)	Total		1	100.00%		
	White	Total	1	100.00%		
		Female	1	100.00%		
Curbside Detention	Total		584	100.00%	364	100.00%
	Asian	Total	3	0.51%	7	1.92%
		Female	1	0.17%	1	0.27%
		Male	2	0.34%	6	1.65%
	Black/African American	Total	20	3.42%	18	4.95%
		Female	4	0.68%	5	1.37%
		Male	16	2.74%	13	3.57%
	Hispanic/Latino(a)	Total	120	20.55%	103	28.30%
		Female	14	2.40%	16	4.40%
		Male	106	18.15%	87	23.90%
	Middle Eastern or South Asian	Total	3	0.51%	3	0.82%
		Male	3	0.51%	3	0.82%
	Native American	Total	1	0.17%		
		Male	1	0.17%		
	Pacific Islander	Total	2	0.34%	1	0.27%
		Male	2	0.34%	1	0.27%
	White	Total	435	74.49%	232	63.74%
		Female	77	13.18%	52	14.29%
		Male	358	61.30%	179	49.18%
		Transgender Woman/Girl			1	0.27%
	Total				1	100.00%
Electronic Control Device Pointed At Person Or Sparked	Hispanic/Latino(a)	Total			1	100.00%
		Male			1	100.00%
	Total				3	100.00%
Electronic Control Device Used In Drive-Stun Mode	Hispanic/Latino(a)	Total			2	66.67%
		Male			2	66.67%
	White	Total			1	33.33%
		Female			1	33.33%
	Total		385	100.00%	299	100.00%
Field Sobriety Test Conducted	Asian	Total	8	2.08%	10	3.34%
		Female	4	1.04%	4	1.34%
		Male	4	1.04%	6	2.01%
	Black/African American	Total	13	3.38%	13	4.35%
		Female	1	0.26%	3	1.00%
		Male	12	3.12%	10	3.34%
	Hispanic/Latino(a)	Total	158	41.04%	120	40.13%
		Female	25	6.49%	10	3.34%
		Male	133	34.55%	108	36.12%
		Transgender Man/Boy			2	0.67%
	Middle Eastern or South Asian	Total	3	0.78%	2	0.67%
		Female	1	0.26%	1	0.33%
		Male	2	0.52%	1	0.33%
	Native American	Total	1	0.26%		
		Female	1	0.26%		
	Pacific Islander	Total	1	0.26%	1	0.33%
		Male	1	0.26%	1	0.33%
	White	Total	201	52.21%	153	51.17%
		Female	49	12.73%	42	14.05%
		Male	152	39.48%	110	36.79%
		Transgender Man/Boy			1	0.33%
	Total		6	100.00%		
Firearm Pointed At Person	Black/African American	Total	1	16.67%		
		Male	1	16.67%		
	Hispanic/Latino(a)	Total	3	50.00%		
		Female	1	16.67%		
		Male	2	33.33%		
	White	Total	2	33.33%		
		Female	1	16.67%		
		Male	1	16.67%		
Handcuffed Or Flex Cuffed	Total		459	100.00%	71	100.00%

None	Asian	<b>Total</b>	<b>2</b>	<b>0.44%</b>	<b>5</b>	<b>7.04%</b>
		Female			2	2.82%
		Male	2	0.44%	3	4.23%
	Black/African American	<b>Total</b>	<b>29</b>	<b>6.32%</b>	<b>2</b>	<b>2.82%</b>
		Female	5	1.09%	1	1.41%
		Male	24	5.23%	1	1.41%
	Hispanic/Latino(a)	<b>Total</b>	<b>156</b>	<b>33.99%</b>	<b>20</b>	<b>28.17%</b>
		Female	20	4.36%	3	4.23%
		Male	136	29.63%	16	22.54%
		Transgender Man/Boy			1	1.41%
	Middle Eastern or South Asian	<b>Total</b>	<b>1</b>	<b>0.22%</b>	<b>2</b>	<b>2.82%</b>
		Male	1	0.22%	2	2.82%
	Native American	<b>Total</b>	<b>1</b>	<b>0.22%</b>		
		Female	1	0.22%		
	Pacific Islander	<b>Total</b>	<b>3</b>	<b>0.65%</b>		
		Male	3	0.65%		
	White	<b>Total</b>	<b>267</b>	<b>58.17%</b>	<b>42</b>	<b>59.15%</b>
		Female	61	13.29%	13	18.31%
		Male	206	44.88%	28	39.44%
		Transgender Woman/Girl			1	1.41%
	<b>Total</b>		<b>9070</b>	<b>100.00%</b>	<b>8259</b>	<b>100.00%</b>
	Asian	<b>Total</b>	<b>285</b>	<b>3.14%</b>	<b>325</b>	<b>3.94%</b>
		Female	114	1.26%	130	1.57%
		Male	171	1.89%	195	2.36%
	Black/African American	<b>Total</b>	<b>467</b>	<b>5.15%</b>	<b>413</b>	<b>5.00%</b>
		Female	134	1.48%	120	1.45%
		Male	333	3.67%	291	3.52%
		Transgender Man/Boy			2	0.02%
	Hispanic/Latino(a)	<b>Total</b>	<b>2811</b>	<b>30.99%</b>	<b>2673</b>	<b>32.36%</b>
		Female	670	7.39%	725	8.78%
		Male	2138	23.57%	1941	23.50%
		Transgender Man/Boy	3	0.03%	3	0.04%
		Transgender Woman/Girl			4	0.05%
	Middle Eastern or South Asian	<b>Total</b>	<b>223</b>	<b>2.46%</b>	<b>221</b>	<b>2.68%</b>
		Female	36	0.40%	38	0.46%
		Male	187	2.06%	183	2.22%
	Multiple	<b>Total</b>	<b>14</b>	<b>0.15%</b>	<b>1</b>	<b>0.01%</b>
		Female	3	0.03%		
		Male	3	0.03%	1	0.01%
		Male	8	0.09%		
Other Physical Or Vehicle Contact	Native American	<b>Total</b>	<b>9</b>	<b>0.10%</b>	<b>12</b>	<b>0.15%</b>
		Female	4	0.04%	4	0.05%
		Male	5	0.06%	7	0.08%
		Transgender Woman/Girl			1	0.01%
	Pacific Islander	<b>Total</b>	<b>58</b>	<b>0.64%</b>	<b>43</b>	<b>0.52%</b>
		Female	22	0.24%	13	0.16%
		Male	36	0.40%	30	0.36%
	White	<b>Total</b>	<b>5203</b>	<b>57.36%</b>	<b>4571</b>	<b>55.35%</b>
		Female	2	0.02%	1	0.01%
		Female	1921	21.18%	1566	18.96%
		Male	3275	36.11%	2983	36.12%
		Transgender Man/Boy	4	0.04%	16	0.19%
		Transgender Woman/Girl	1	0.01%	5	0.06%
	<b>Total</b>		<b>3</b>	<b>100.00%</b>		
	White	<b>Total</b>	<b>3</b>	<b>100.00%</b>		
		Female	2	66.67%		
		Male	1	33.33%		
Patrol Car Detention	<b>Total</b>		<b>79</b>	<b>100.00%</b>	<b>68</b>	<b>100.00%</b>
	Black/African American	<b>Total</b>	<b>2</b>	<b>2.53%</b>	<b>8</b>	<b>11.76%</b>
		Female			2	2.94%
		Male	2	2.53%	6	8.82%
	Hispanic/Latino(a)	<b>Total</b>	<b>29</b>	<b>36.71%</b>	<b>16</b>	<b>23.53%</b>
		Female	2	2.53%	4	5.88%
		Male	27	34.18%	12	17.65%
	Middle Eastern or South Asian	<b>Total</b>	<b>1</b>	<b>1.27%</b>	<b>2</b>	<b>2.94%</b>
		Male	1	1.27%	2	2.94%
	White	<b>Total</b>	<b>47</b>	<b>59.49%</b>	<b>42</b>	<b>61.76%</b>
Peace Officer's Canine Bit Or Held Person		Female	17	21.52%	11	16.18%
		Male	30	37.97%	31	45.59%
	<b>Total</b>				<b>4</b>	<b>100.00%</b>
	Hispanic/Latino(a)	<b>Total</b>			<b>2</b>	<b>50.00%</b>
		Male			2	50.00%
	White	<b>Total</b>			<b>2</b>	<b>50.00%</b>
		Male			2	50.00%

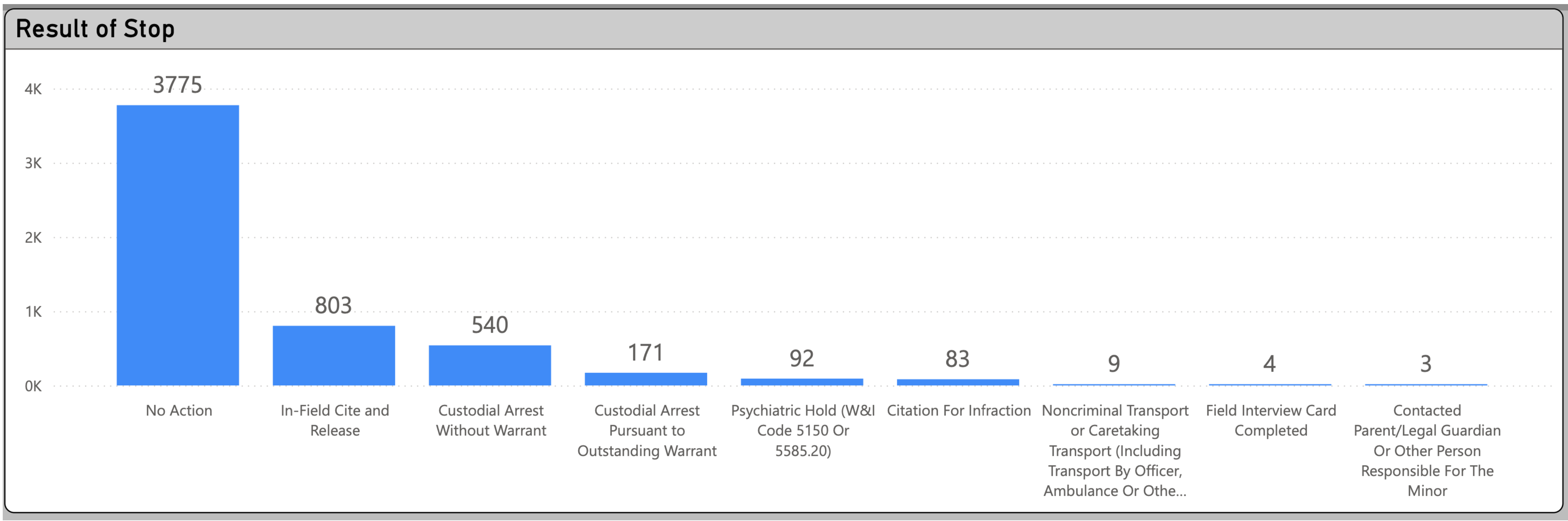
Peace Officer'S Canine Used To Search For, Locate And/Or Detect Contraband	<b>Total</b>				<b>1</b>	<b>100.00%</b>
	White	<b>Total</b>			<b>1</b>	<b>100.00%</b>
		Male			1	100.00%
Person Photographed	<b>Total</b>		<b>1</b>	<b>100.00%</b>	<b>3</b>	<b>100.00%</b>
	Asian	<b>Total</b>			<b>1</b>	<b>33.33%</b>
		Female			1	33.33%
	White	<b>Total</b>	<b>1</b>	<b>100.00%</b>	<b>2</b>	<b>66.67%</b>
		Female			1	33.33%
		Male	1	100.00%	1	33.33%
Person Removed From Vehicle By Order	<b>Total</b>		<b>417</b>	<b>100.00%</b>	<b>66</b>	<b>100.00%</b>
	Asian	<b>Total</b>	<b>7</b>	<b>1.68%</b>	<b>3</b>	<b>4.55%</b>
		Female	3	0.72%		
		Male	4	0.96%	3	4.55%
	Black/African American	<b>Total</b>	<b>19</b>	<b>4.56%</b>	<b>5</b>	<b>7.58%</b>
		Female	3	0.72%	1	1.52%
		Male	16	3.84%	4	6.06%
	Hispanic/Latino(a)	<b>Total</b>	<b>193</b>	<b>46.28%</b>	<b>22</b>	<b>33.33%</b>
		Female	31	7.43%	4	6.06%
		Male	162	38.85%	18	27.27%
	Middle Eastern or South Asian	<b>Total</b>	<b>3</b>	<b>0.72%</b>	<b>1</b>	<b>1.52%</b>
		Female	1	0.24%		
		Male	2	0.48%	1	1.52%
	Native American	<b>Total</b>	<b>2</b>	<b>0.48%</b>		
		Female	1	0.24%		
		Male	1	0.24%		
	Pacific Islander	<b>Total</b>	<b>2</b>	<b>0.48%</b>		
		Female	1	0.24%		
		Male	1	0.24%		
	White	<b>Total</b>	<b>191</b>	<b>45.80%</b>	<b>35</b>	<b>53.03%</b>
		Female	40	9.59%	6	9.09%
		Male	151	36.21%	29	43.94%
Person Removed From Vehicle By Physical Contact	<b>Total</b>		<b>21</b>	<b>100.00%</b>	<b>4</b>	<b>100.00%</b>
	Hispanic/Latino(a)	<b>Total</b>	<b>12</b>	<b>57.14%</b>	<b>2</b>	<b>50.00%</b>
		Male	12	57.14%	2	50.00%
	Middle Eastern or South Asian	<b>Total</b>	<b>2</b>	<b>9.52%</b>		
		Female	1	4.76%		
		Male	1	4.76%		
	White	<b>Total</b>	<b>7</b>	<b>33.33%</b>	<b>2</b>	<b>50.00%</b>
		Female	2	9.52%		
		Male	5	23.81%	2	50.00%
Physical Compliance Tactics And Techniques	<b>Total</b>				<b>2</b>	<b>100.00%</b>
	Hispanic/Latino(a)	<b>Total</b>			<b>1</b>	<b>50.00%</b>
		Male			1	50.00%
	White	<b>Total</b>			<b>1</b>	<b>50.00%</b>
		Male			1	50.00%
Property Was Seized	<b>Total</b>		<b>313</b>	<b>100.00%</b>	<b>130</b>	<b>100.00%</b>
	Asian	<b>Total</b>	<b>4</b>	<b>1.28%</b>	<b>2</b>	<b>1.54%</b>
		Female	3	0.96%		
		Male	1	0.32%	2	1.54%
	Black/African American	<b>Total</b>	<b>14</b>	<b>4.47%</b>	<b>7</b>	<b>5.38%</b>
		Female	2	0.64%	1	0.77%
		Male	12	3.83%	6	4.62%
	Hispanic/Latino(a)	<b>Total</b>	<b>77</b>	<b>24.60%</b>	<b>28</b>	<b>21.54%</b>
		Female	9	2.88%	7	5.38%
		Male	68	21.73%	19	14.62%
		Transgender Man/Boy			1	0.77%
		Transgender Woman/Girl			1	0.77%
	Middle Eastern or South Asian	<b>Total</b>	<b>3</b>	<b>0.96%</b>	<b>1</b>	<b>0.77%</b>
		Male	3	0.96%	1	0.77%
	Native American	<b>Total</b>	<b>1</b>	<b>0.32%</b>	<b>2</b>	<b>1.54%</b>
		Female	1	0.32%		
		Male			2	1.54%
	Pacific Islander	<b>Total</b>	<b>2</b>	<b>0.64%</b>	<b>1</b>	<b>0.77%</b>
		Male	2	0.64%	1	0.77%
	White	<b>Total</b>	<b>212</b>	<b>67.73%</b>	<b>89</b>	<b>68.46%</b>
		Female	45	14.38%	18	13.85%
		Male	167	53.35%	70	53.85%
		Transgender Woman/Girl			1	0.77%
Ran Name Of Stopped Person'S Passenger (E.G., Using Patrol Car Computer Or Through A Request To Dispatch)	<b>Total</b>				<b>15</b>	<b>100.00%</b>
	Black/African American	<b>Total</b>			<b>1</b>	<b>6.67%</b>
		Male			1	6.67%
	Hispanic/Latino(a)	<b>Total</b>			<b>12</b>	<b>80.00%</b>
		Female			4	26.67%
		Male			8	53.33%

Search Of Person Was Conducted	White	<b>Total</b>			<b>2</b>	<b>13.33%</b>
		Male			2	13.33%
	<b>Total</b>		<b>1363</b>	<b>100.00%</b>	<b>654</b>	<b>100.00%</b>
	Asian	<b>Total</b>	<b>11</b>	<b>0.81%</b>	<b>14</b>	<b>2.14%</b>
		Female	3	0.22%	3	0.46%
		Male	8	0.59%	11	1.68%
	Black/African American	<b>Total</b>	<b>61</b>	<b>4.48%</b>	<b>36</b>	<b>5.50%</b>
		Female	9	0.66%	5	0.76%
		Male	52	3.82%	31	4.74%
	Hispanic/Latino(a)	<b>Total</b>	<b>418</b>	<b>30.67%</b>	<b>184</b>	<b>28.13%</b>
Search Of Property Was Conducted		Female	44	3.23%	24	3.67%
		Male	374	27.44%	156	23.85%
		Transgender Man/Boy			3	0.46%
		Transgender Woman/Girl			1	0.15%
	Middle Eastern or South Asian	<b>Total</b>	<b>10</b>	<b>0.73%</b>	<b>2</b>	<b>0.31%</b>
		Female	1	0.07%		
		Male	9	0.66%	2	0.31%
	Native American	<b>Total</b>	<b>3</b>	<b>0.22%</b>	<b>2</b>	<b>0.31%</b>
		Female	1	0.07%		
		Male	2	0.15%	2	0.31%
Terry V. Ohio Frisk/Pat Search Of The Person'S Outer Clothing Was Conducted	Pacific Islander	<b>Total</b>	<b>5</b>	<b>0.37%</b>	<b>3</b>	<b>0.46%</b>
		Male	5	0.37%	3	0.46%
	White	<b>Total</b>	<b>855</b>	<b>62.73%</b>	<b>413</b>	<b>63.15%</b>
		Female	169	12.40%	86	13.15%
		Male	686	50.33%	325	49.69%
		Transgender Man/Boy			1	0.15%
		Transgender Woman/Girl			1	0.15%
	<b>Total</b>		<b>1045</b>	<b>100.00%</b>	<b>437</b>	<b>100.00%</b>
	Asian	<b>Total</b>	<b>8</b>	<b>0.77%</b>	<b>5</b>	<b>1.14%</b>
		Female	3	0.29%	1	0.23%
Vehicle Impounded		Male	5	0.48%	4	0.92%
	Black/African American	<b>Total</b>	<b>40</b>	<b>3.83%</b>	<b>19</b>	<b>4.35%</b>
		Female	6	0.57%	2	0.46%
		Male	34	3.25%	17	3.89%
	Hispanic/Latino(a)	<b>Total</b>	<b>313</b>	<b>29.95%</b>	<b>125</b>	<b>28.60%</b>
		Female	33	3.16%	12	2.75%
		Male	280	26.79%	112	25.63%
		Transgender Woman/Girl			1	0.23%
	Middle Eastern or South Asian	<b>Total</b>	<b>7</b>	<b>0.67%</b>		
		Female	1	0.10%		
Total		Male	6	0.57%		
	Native American	<b>Total</b>	<b>1</b>	<b>0.10%</b>	<b>1</b>	<b>0.23%</b>
		Male	1	0.10%	1	0.23%
	Pacific Islander	<b>Total</b>	<b>5</b>	<b>0.48%</b>	<b>3</b>	<b>0.69%</b>
		Female	1	0.10%		
		Male	4	0.38%	3	0.69%
	White	<b>Total</b>	<b>671</b>	<b>64.21%</b>	<b>284</b>	<b>64.99%</b>
		Female	133	12.73%	58	13.27%
		Male	538	51.48%	226	51.72%
	<b>Total</b>				<b>20</b>	<b>100.00%</b>
Applied filters: Year is 2023 or 2024	Asian	<b>Total</b>			<b>1</b>	<b>5.00%</b>
		Male			1	5.00%
	Hispanic/Latino(a)	<b>Total</b>			<b>7</b>	<b>35.00%</b>
		Female			1	5.00%
		Male			6	30.00%
	White	<b>Total</b>			<b>12</b>	<b>60.00%</b>
		Female			3	15.00%
		Male			9	45.00%
	<b>Total</b>		<b>7</b>	<b>100.00%</b>	<b>12</b>	<b>100.00%</b>
	Hispanic/Latino(a)	<b>Total</b>	<b>3</b>	<b>42.86%</b>	<b>7</b>	<b>58.33%</b>
		Female			1	8.33%
		Male	3	42.86%	6	50.00%
	Middle Eastern or South Asian	<b>Total</b>	<b>1</b>	<b>14.29%</b>		
		Female	1	14.29%		
	Pacific Islander	<b>Total</b>			<b>1</b>	<b>8.33%</b>
		Male			1	8.33%
	White	<b>Total</b>	<b>3</b>	<b>42.86%</b>	<b>4</b>	<b>33.33%</b>
		Female	2	28.57%	1	8.33%
		Male	1	14.29%	3	25.00%
	<b>Total</b>		<b>14217</b>	<b>100.00%</b>	<b>10865</b>	<b>100.00%</b>

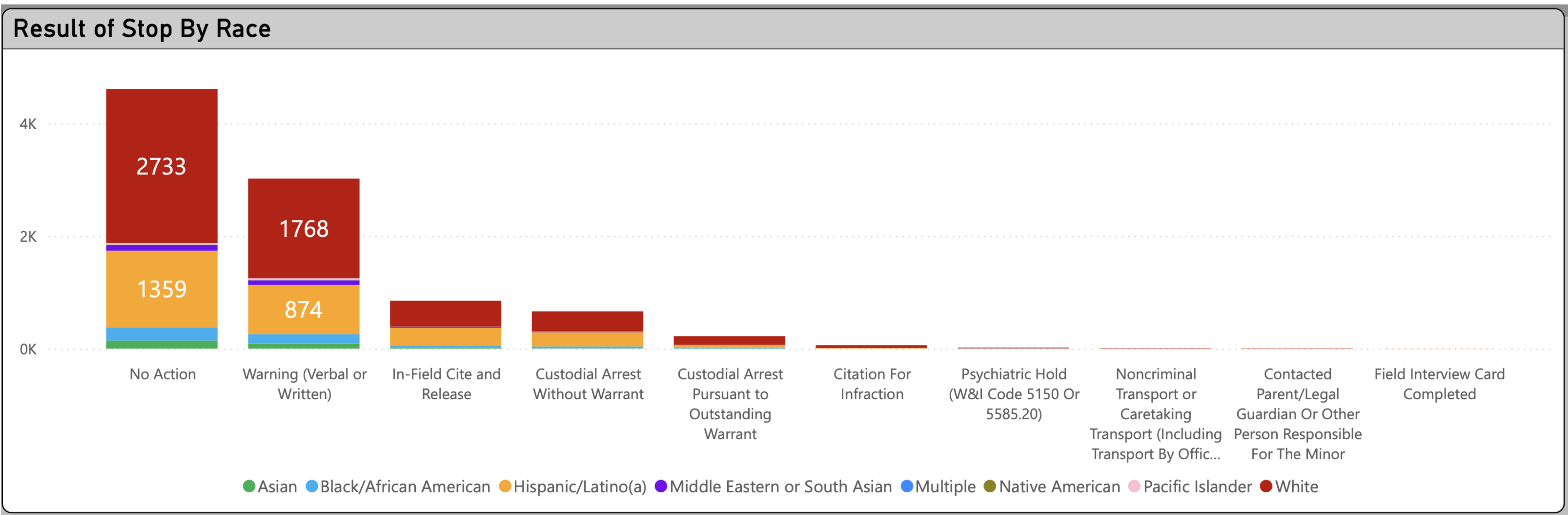
# Result of Stop – 2023 (Number)



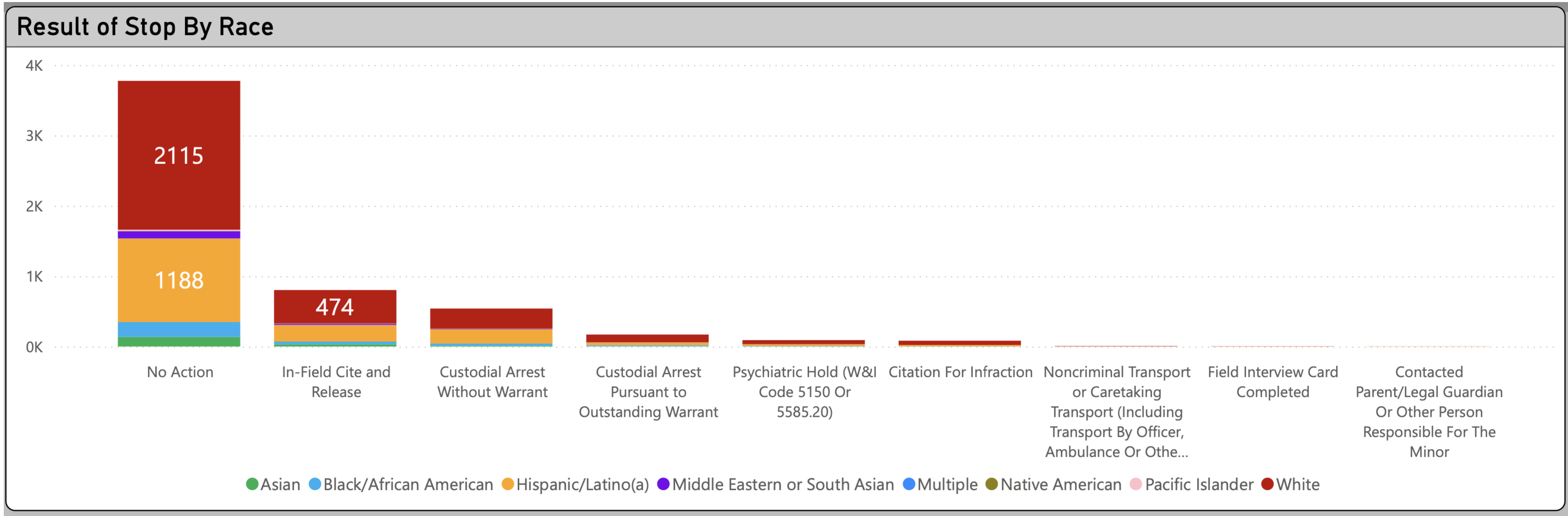
# Result of Stop – 2024 (Number)



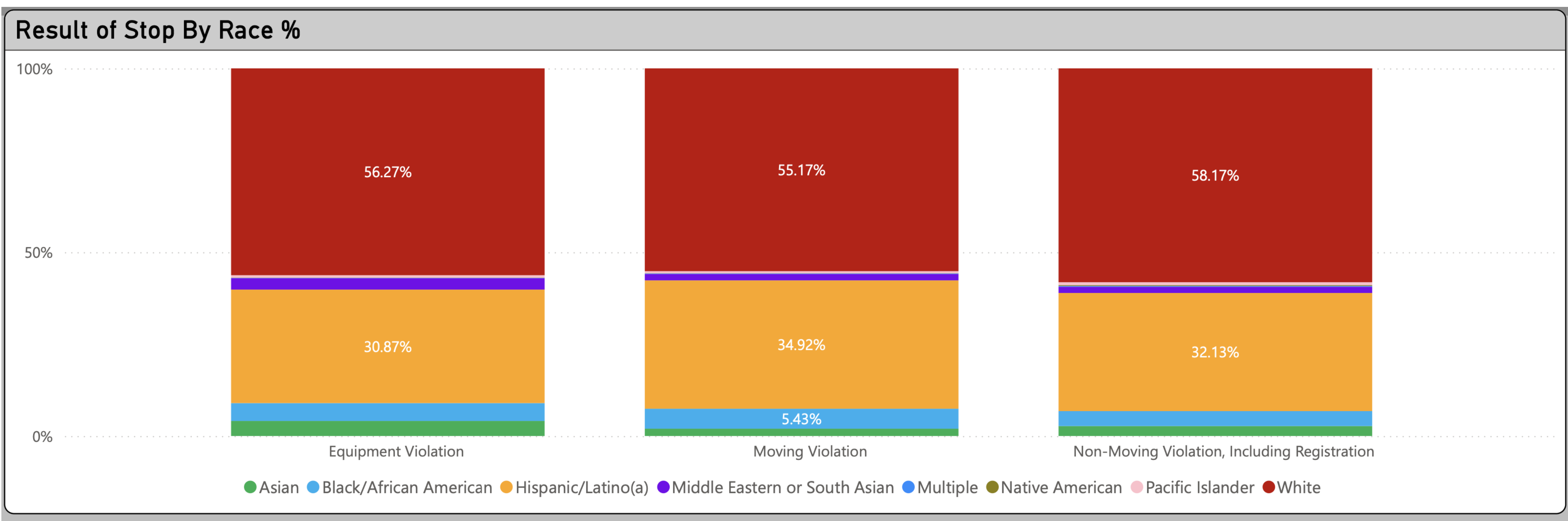
# Result of Stop – By Race 2023 (Number)



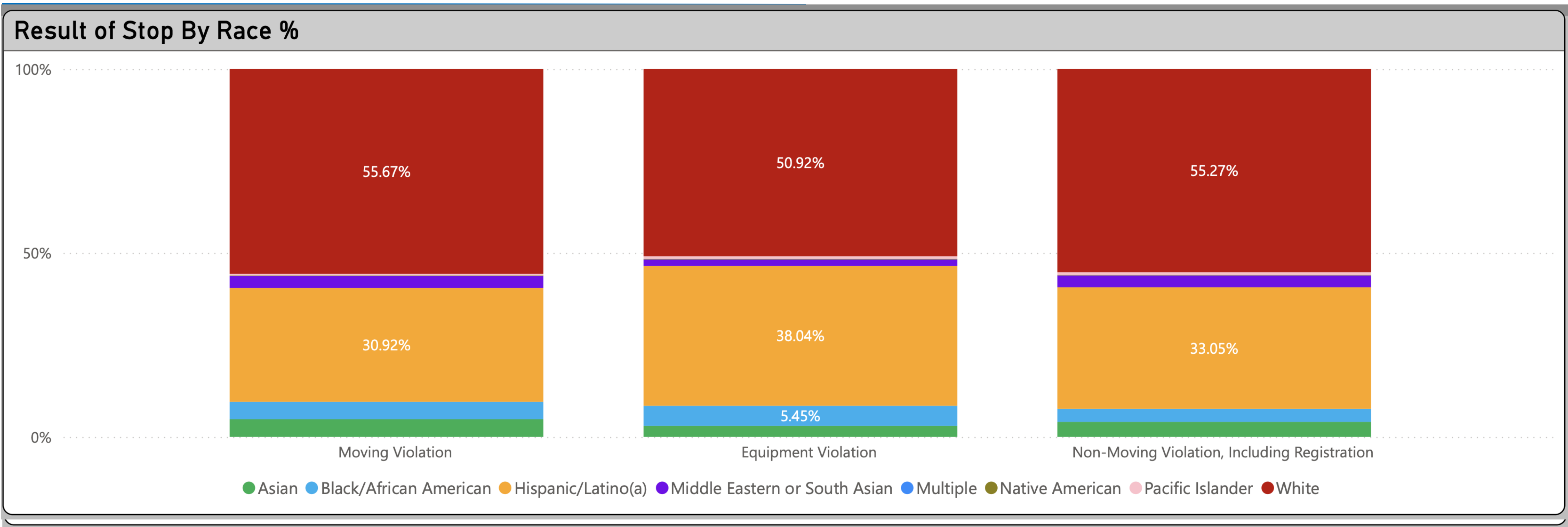
# Result of Stop – By Race 2024 (Number)



# Result of Stop – By Race 2023 (Percentage)



# Result of Stop – By Race 2024 (Percentage)



# Results of Stop – Full Table with 2023-2024 Data

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**Table appears on next page.**

Please refer to the Review of RIPA Data in the body of the Annual Report for information on the challenges of comparison between 2023 and 2024 data.



Result of Stop	Perceived Race or Ethnicity 1	Perceived Gender 1	2023	2023 %	2024	2024 %	
Citation For Infraction	Total		61	100.00%	83	100.00%	
	Black/African American	Total	1	1.64%	3	3.61%	
		Female				1	1.20%
		Male	1	1.64%	2	2.41%	
	Hispanic/Latino(a)	Total	9	14.75%	20	24.10%	
		Female				1	1.20%
		Male	9	14.75%	19	22.89%	
	Pacific Islander	Total	2	3.28%			
		Male	2	3.28%			
	White	Total	49	80.33%	60	72.29%	
Female		7	11.48%	9	10.84%		
Contacted Parent/Legal Guardian Or Other Person Responsible For The Minor	Male	42	68.85%	51	61.45%		
	Total	7	100.00%	3	100.00%		
	Hispanic/Latino(a)	Total	2	28.57%	2	66.67%	
		Male	2	28.57%	2	66.67%	
	White	Total	5	71.43%	1	33.33%	
		Female	2	28.57%	1	33.33%	
		Male	3	42.86%			
	Custodial Arrest Pursuant to Outstanding Warrant	Total	221	100.00%	171	100.00%	
		Asian	Total			5	2.92%
			Male			5	2.92%
Black/African American		Total	17	7.69%	14	8.19%	
		Female	1	0.45%	1	0.58%	
		Male	16	7.24%	13	7.60%	
Hispanic/Latino(a)		Total	49	22.17%	40	23.39%	
		Female	6	2.71%	8	4.68%	
		Male	43	19.46%	31	18.13%	
Transgender Man/Boy					1	0.58%	
	Total	1	0.45%	2	1.17%		
Middle Eastern or South Asian	Male	1	0.45%	2	1.17%		
	White	Total	154	69.68%	110	64.33%	
		Female	42	19.00%	36	21.05%	
		Male	112	50.68%	74	43.27%	
	Custodial Arrest Without Warrant	Total	662	100.00%	540	100.00%	
		Asian	Total	7	1.06%	12	2.22%
			Female	2	0.30%	2	0.37%
			Male	5	0.76%	10	1.85%
		Black/African American	Total	33	4.98%	32	5.93%
			Female	7	1.06%	7	1.30%
Male			26	3.93%	24	4.44%	
Transgender Man/Boy					1	0.19%	
		Total	252	38.07%	202	37.41%	
		Female	30	4.53%	22	4.07%	
Male		222	33.53%	178	32.96%		
	Transgender Man/Boy			2	0.37%		
	Total	7	1.06%	5	0.93%		
Middle Eastern or South Asian	Female			1	0.19%		
	Male	7	1.06%	4	0.74%		
	Native American	Total	2	0.30%			
Female		1	0.15%				
Male		1	0.15%				
Pacific Islander	Total	3	0.45%	3	0.56%		
	Male	3	0.45%	3	0.56%		
	White	Total	358	54.08%	286	52.96%	
Female		103	15.56%	70	12.96%		
Male		255	38.52%	213	39.44%		
Transgender Man/Boy				2	0.37%		
	Transgender Woman/Girl			1	0.19%		
	Field Interview Card Completed	Total	2	100.00%	4	100.00%	
Hispanic/Latino(a)		Total	1	50.00%	1	25.00%	
		Female	1	50.00%			
	Male			1	25.00%		
White	Total	1	50.00%	3	75.00%		
	Male	1	50.00%	3	75.00%		
	In-Field Cite and Release	Total	851	100.00%	803	100.00%	
Asian		Total	15	1.76%	32	3.99%	

No Action		Female	6	0.71%	14	1.74%
		Male	9	1.06%	18	2.24%
		<b>Total</b>	<b>44</b>	<b>5.17%</b>	<b>39</b>	<b>4.86%</b>
		Female	9	1.06%	14	1.74%
		Male	35	4.11%	25	3.11%
		<b>Total</b>	<b>311</b>	<b>36.55%</b>	<b>237</b>	<b>29.51%</b>
		Female	73	8.58%	52	6.48%
		Male	237	27.85%	184	22.91%
		Transgender Man/Boy	1	0.12%	1	0.12%
		<b>Total</b>	<b>17</b>	<b>2.00%</b>	<b>17</b>	<b>2.12%</b>
		Female	2	0.24%	6	0.75%
		Male	15	1.76%	11	1.37%
		<b>Total</b>	<b>2</b>	<b>0.24%</b>		
		Female	1	0.12%		
		Male	1	0.12%		
		<b>Total</b>	<b>1</b>	<b>0.12%</b>	<b>1</b>	<b>0.12%</b>
		Female			1	0.12%
		Male	1	0.12%		
		<b>Total</b>	<b>2</b>	<b>0.24%</b>	<b>3</b>	<b>0.37%</b>
		Female	1	0.12%		
		Male	1	0.12%	3	0.37%
		<b>Total</b>	<b>459</b>	<b>53.94%</b>	<b>474</b>	<b>59.03%</b>
		Female	144	16.92%	132	16.44%
		Male	314	36.90%	340	42.34%
		Transgender Man/Boy	1	0.12%	1	0.12%
		Transgender Woman/Girl			1	0.12%
		<b>Total</b>	<b>4605</b>	<b>100.00%</b>	<b>3775</b>	<b>100.00%</b>
		<b>Total</b>	<b>143</b>	<b>3.11%</b>	<b>136</b>	<b>3.60%</b>
		Female	51	1.11%	55	1.46%
		Male	92	2.00%	81	2.15%
		<b>Total</b>	<b>236</b>	<b>5.12%</b>	<b>212</b>	<b>5.62%</b>
		Female	63	1.37%	51	1.35%
		Male	173	3.76%	160	4.24%
		Transgender Man/Boy			1	0.03%
		<b>Total</b>	<b>1359</b>	<b>29.51%</b>	<b>1188</b>	<b>31.47%</b>
		Female	312	6.78%	291	7.71%
		Male	1046	22.71%	895	23.71%
		Transgender Man/Boy	1	0.02%		
		Transgender Woman/Girl			2	0.05%
		<b>Total</b>	<b>101</b>	<b>2.19%</b>	<b>102</b>	<b>2.70%</b>
		Female	19	0.41%	11	0.29%
		Male	82	1.78%	91	2.41%
		<b>Total</b>	<b>7</b>	<b>0.15%</b>	<b>1</b>	<b>0.03%</b>
			4	0.09%		
		Female			1	0.03%
		Male	3	0.07%		
		<b>Total</b>	<b>3</b>	<b>0.07%</b>	<b>4</b>	<b>0.11%</b>
		Female	1	0.02%		
		Male	2	0.04%	4	0.11%
		<b>Total</b>	<b>23</b>	<b>0.50%</b>	<b>17</b>	<b>0.45%</b>
		Female	11	0.24%	3	0.08%
		Male	12	0.26%	14	0.37%
		<b>Total</b>	<b>2733</b>	<b>59.35%</b>	<b>2115</b>	<b>56.03%</b>
		Female	924	20.07%	657	17.40%
		Male	1807	39.24%	1449	38.38%
		Transgender Man/Boy	2	0.04%	6	0.16%
		Transgender Woman/Girl			3	0.08%
		<b>Total</b>	<b>8</b>	<b>100.00%</b>	<b>9</b>	<b>100.00%</b>
Noncriminal Transport or Caretaking Transport (Including Transport By Officer, Ambulance Or Other Agency)		<b>Total</b>			<b>1</b>	<b>11.11%</b>
		Male			1	11.11%
		<b>Total</b>	<b>1</b>	<b>12.50%</b>	<b>3</b>	<b>33.33%</b>
		Female			3	33.33%
		Male	1	12.50%		
		<b>Total</b>	<b>7</b>	<b>87.50%</b>	<b>5</b>	<b>55.56%</b>
		Female	3	37.50%	1	11.11%
		Male	4	50.00%	4	44.44%
		<b>Total</b>	<b>19</b>	<b>100.00%</b>	<b>92</b>	<b>100.00%</b>
Psychiatric Hold (W&I Code 5150 Or		<b>Total</b>				

5585.20)	Asian	Total	1	5.26%	4	4.35%	
		Female			3	3.26%	
		Male	1	5.26%	1	1.09%	
	Black/African American	Total	2	10.53%	4	4.35%	
		Female			3	3.26%	
		Male	2	10.53%	1	1.09%	
	Hispanic/Latino(a)	Total	2	10.53%	24	26.09%	
		Female	1	5.26%	13	14.13%	
		Male	1	5.26%	11	11.96%	
	Middle Eastern or South Asian	Total			1	1.09%	
		Female			1	1.09%	
	Pacific Islander	Total			1	1.09%	
		Male			1	1.09%	
	White	Total	14	73.68%	58	63.04%	
					1	1.09%	
		Female	6	31.58%	24	26.09%	
	Warning (Verbal or Written)	Male	8	42.11%	33	35.87%	
		Total	3018	100.00%			
		Asian	Total	93	3.08%		
			Female	39	1.29%		
			Male	54	1.79%		
		Black/African American	Total	165	5.47%		
Female			50	1.66%			
Male			115	3.81%			
Hispanic/Latino(a)		Total	874	28.96%			
		Female	199	6.59%			
		Male	674	22.33%			
Middle Eastern or South Asian		Transgender Man/Boy	1	0.03%			
		Total	79	2.62%			
		Female	13	0.43%			
Multiple		Male	66	2.19%			
		Total	5	0.17%			
		Female	2	0.07%			
Native American		Male	3	0.10%			
		Total	5	0.17%			
		Female	3	0.10%			
Pacific Islander		Male	2	0.07%			
		Total	29	0.96%			
		Female	9	0.30%			
White		Male	20	0.66%			
	Total	1768	58.58%				
	Female	646	21.40%				
	Male	1120	37.11%				
	Transgender Man/Boy	1	0.03%				
	Transgender Woman/Girl	1	0.03%				
Total		9454	100.00%	5480	100.00%		

Applied filters:  
Year is 2023 or 2024

## APPENDIX F – ACRONYMS, ABBREVIATIONS, TERMINOLOGY

Appendix Begins on Following Page

## Acronyms, Abbreviations & Terminology

### Used in the Independent Police Auditor's Annual Report

**360 Degree Review:** A review template created by the IPA to assess police actions in relation to interactions with the public from all points of view, as opposed to only the legality of the actions.

**AHCAC:** Ad Hoc Community Advisory Committee

**AUCA:** Agreed Upon Courses of Action

**BIPOC:** Technically, this term means “Black, Indigenous, and people of color”. For the Monitor’s reports, this term refers to people who self-identified as American Indian, Alaskan Native, Asian, Black or African American, Hispanic/Latino, Native Hawaiian or Other Pacific Islander, or Two or More Races

**DATA (D.A.T.A.):** Detailed Analysis of Tour Activity

**DEI:** Diversity, Equity, and Inclusion

**BWC:** Body-worn camera

**Critical Incident:** An incident that involves an officer involved shooting, whether or not a person was struck, and any incident involving a PPD police officer that results in death or serious injury

**City:** The City of Petaluma, California

**Department:** Petaluma Police Department

**Disparity:** The unequal distribution of incidents across different groups

**EWS:** Early Warning System

**IPA:** Independent Police Auditor, IntegrAssure, LLC/Jeff Schlanger

**IntegrAssure:** IntegrAssure, LLC, founded in March 2021 by its President and Chief Executive Officer, Jeff Schlanger, upon his retirement as the Deputy Commissioner of Risk Management Bureau for the New York City Police Department

**OIS:** Officer Involved Shooting

**Operational Integrity:** The actions of the officers demonstrate effective and appropriate implementation of policies and the training

**Peelian Principles:** A set of guidelines for policing that emphasize public cooperation, crime prevention, and ethical conduct, with the core idea that police legitimacy stems from public trust and respect developed by Sir Robert Peel in the 19<sup>th</sup> Century.

**POBR:** Public Safety Officers Procedural Bill of Rights

**POST:** Peace Officer Standards & Training, a California state entity that documents and manages the certification and training of all active police officers in California

**PPD:** Petaluma Police Department

**PSD:** Professional Standards Division

**PSAC:** Public Safety Advisory Committee

**RIPA:** Racial and Identity Profiling Act, California's Assembly Bill #953 passed in 2015

**RFP:** Request for Proposal

**S.A.F.E. (SAFE):** Specialized Assistance for Everyone

**SME:** Subject Matter Expert

**SOP:** Standard Operating Procedure

**UOF:** Use of Force