

Use of Force
Investigations &
Review Policy:
Summary Report & Initial
Recommendations

Cleveland Community Police Commission (CCPC)

May 10, 2016

Table of Contents

I.	Cleveland Community Police Commission (CCPC) Members	2
II.	Description of Work Product and Deadline	2
III.	Statement of Community Feedback Process	2
IV.	Key to Reading Report	3
V.	Use of Force Reporting Recommendations	3
VI.	Use of Force Investigations Recommendations	8
VII.	Use of Force Investigations: General Comments	12
VIII.	Other Comments	13

I. Cleveland Community Police Commission (CCPC) Members

*(*Use of Force Work Group Members)*

*Anthony Body

*Dr. Kathy Clegg

*Mario Clopton (CCPC Co-Chair)

Rev. Dr. Yvonne Conner

Hon. Lee Fisher

*Det. Lynn Hampton

Sgt. Deirdre Jones

Amanda King

Det. Steve Loomis

Dylan Sellers

*Dr. Rhonda Y. Williams (CCPC Co-Chair)

II. Description of Work Product and Deadline

Per the Monitor Plan dated March 30, 2016:

¶¶ 47, 75, 93–101, 110–123

CPD will concurrently develop two (2) individual policies, including any sub-policies and/or related policy manuals, addressing: (i) chain of command investigations of lower-level Level 1 and Level 2 force (the "Chain of Command Investigations Policy"; and (ii) Force Investigation Team ("FIT") investigations of Level 3 and other uses of force outlined in ¶ 111 of the Agreement (the "FIT Investigations Policy"). These sets of policies will include a revision or replacement of current portions of General Police Orders 2.1.01–06 that relate to the investigation of use of force; the creation, revision, or replacement of any operative policies or manual related to FIT (¶ 123); and any Memorandum of Understanding or equivalent agreement established between CPD and any outside agency to conduct criminal investigations of uses of force (¶ 110).

CCPC Work Product:

CPC will collect the concerns, experiences, values, and issues related to the internal, administrative investigations and subsequent review of force from members across Cleveland's diverse communities into a written document that fairly and accurately summarizes community input received (the "CPC Use of Force Investigations and Review Work Product"). CPC will distribute the document to CPD, the Parties, and the Monitor.

CCPC Deadline:

Written Summary of Community Input: May 2, 2016

Deadline Extension for Written Summary: May 10, 2016

III. Statement of Community Feedback Process

The CCPC gathered information from the community for this written summary report through its regularly held public meetings. These included:

- April 19 and 27 CCPC Full Commission Meetings
- April 26 Use of Force Work Group Meeting
- “Use of Force I” CCPC Questionnaires, as well as community feedback from Full Commission, Work Group, and Special Meetings previously held.

IV. Key to Reading Report

Cleveland Community Police Commission Recommendation(s)
Comments Supporting Recommendations <ul style="list-style-type: none">• Community questions, concerns, experiences, values, and feedback• Research (as Indicated)

V. Use of Force Reporting Recommendations

1. The CDP needs to revise the range of Use of Force incidents deemed reportable and adjust investigative forms accordingly, including: <ul style="list-style-type: none">○ Shows of Force should be categorized as Level 1 and possibly Level 2 uses of force.○ Range of incidents allowed to be self-reported under Level 2 is too broad.○ Verbal intimidation and use of demeaning language by officers should be considered a Show of Force and should be thoroughly investigated by the Office of Professional Standards and the Civilian Police Review Board.○ In Custody fatalities should be included under Level 3 and investigated by the FIT Team.
<ul style="list-style-type: none">• On-duty and off-duty officers should be required to make reports on witnessing use of force with regard to on-duty and off-duty officers, acting under the color of law.• Traffic stops should be added to the BlueTeam Worksheet under Subject Charges (select all that apply)• The mere threat of a use of force should be reported as a Level 1 or 2 use of force.• Unholstering a gun and pointing it at someone ought to warrant the presence of a supervisor, even if classified as a Level 1 use of force. (See Community Feedback -- “Unholstering” -- below for examples of people’s experiences.)• Is it only physical harm that is counted at Use of Force, or also verbal intimidation? You don’t need to have a physical injury to be harmed. Verbal Intimidation should be considered a show of force and should be reportable on the use of force document. (See Community Feedback - - “Verbal Intimidation” -- below for examples of people’s experiences.)• Officer indicated strong disagreement with verbal intimidation being defined as a Use of Force and investigated as such.

1. The CDP needs to revise the range of Use of Force incidents deemed reportable and adjust investigative forms accordingly, including:

- Shows of Force should be categorized as Level 1 and possibly Level 2 uses of force.
- Range of incidents allowed to be self-reported under Level 2 is too broad.
- Verbal intimidation and use of demeaning language by officers should be considered a Show of Force and should be thoroughly investigated by the Office of Professional Standards and the Civilian Police Review Board.
- In Custody fatalities should be included under Level 3 and investigated by the FIT Team.

- A use of deadly force, as currently defined, leaves out “in custody” cases as reportable, as well as fatalities that have happened 24/48 hours or as a result of use of force. (**See Community Feedback -- In Custody -- below for examples of people's experiences.**)
- There is a problem with there being a number of assaults or actions that are permissible and “self-reported” under Level 2.
- Query regarding how to categorize: Should there be a distinction between an officer drawing a gun on a citizen versus having a gun drawn when investigating a possible crime scene or i.e. entering an abandoned building.

Community Feedback: Examples of Personal Experiences Shared

Unholstering:

- East 105th and Wade Park. Some youth were “wilding”. I was walking across street to my mom’s house. An officer held a loaded shotgun to my head and said “get on the ground!” This person was on the Cleveland School Board at the time.
- Officers held a gun to my head and shined a flashlight in my eyes one night on 80th and Wade Park. They were at the wrong house.
- As a teenager and young adult I have a heightened level of fear. I was pulled from the car [by police] guns drawn.
- Sitting on your property and the police pull a gun on you.

Verbal Intimidation:

- Does Use of Force include verbal commands? It should. As a black man [who has a greater likelihood of being targeted or profiled], I have to decide whether the police officer has the authority to tell me to do this or not, and then I have to figure out whether to do it. Anything that restricts my movement or freedom or dignity is a Use of Force.
- Verbal abuse: dealing with always being called “dumb n....r,” “black m.....f....r”
- Street vendor told to get a “real job” and was given multiple tickets when attempted to explain.

In Custody:

- Groped during pat down, abuse of power differential, forced to be vulnerable then abused (e.g., cuffed, subdued and outnumbered)
- Wife beaten in cell by three police officers while handcuffed.
- Handcuffs put on too tight.
- Banging heads and abusing persons when arrested in patrol cars.

2. The Use of Force reporting forms, which should be revised to include appropriate cultural identifiers, must be filled out fully with accuracy and narrative detail.

- Narrative reporting that always accompany “check the box” forms
- Revision of forms to be up-to-date with cultural and gender identifiers
- Enhanced officer training on appropriate reporting writing styles for investigations

- Use of force reports should include narrative reporting to give context. The officer should not be required to solely “check the box.”
- Gender needs to be added to the BlueTeam Worksheet. It is different than sex.
- Add categories to capture verbal tactics, such as talk, shout, body language (e.g., posting up), etc.
- Providing all this information, including on verbal tactics, and explaining this doesn’t mean that their Use of Force is always wrong. They may be right. So this doesn’t have to make their jobs harder. But it can make them more aware, and help to indicate the need for change of behavior when needed.
- Police should minimize police jargon in their reporting, e.g., unfamiliar acronyms or verbiage. Statements should be clear and detailed.
- Officers indicated that reports are all looking the same, “no variations,” with “run of the mill” language. This needs to change to improve the integrity and quality of reporting.
- Officers indicated that at one time officers were instructed to use boilerplate language in their narrative writing of reports. This is not best practice and is still used by older officers, who are often resistant to change.
- Officers indicated a need for better training in report writing. This could enhance investigations by providing greater clarity and detail in order to follow how the scenario unfolded.
- Is there technology that can track when a gun is unholstered?
- Use of force reporting should include an assessment of the technology used to track Use of Force incidents. (e.g., body cameras, dash cams, technology linked unholstering guns?, etc.)

3. There needs to be better reporting detection of mental health involvement in civilian encounters with the police.

- Notice should be given to if mental health was a factor in use of force.

4. There needs to be more accountability throughout the chain of command to ensure thorough investigations and the honest, full, and accurate completion of use of force reports. Consequences and formal discipline when falsifying reports should be clearly outlined and understood by all officers and law enforcement personnel.

- Question: As a former assistant city prosecutor, I have seen things in police reports that disturb me. The “sameness” of the reports. Will we ask prosecutors to bring up these discrepancies? Is there a Cleveland Police Department process for reviewing reports of officers for “sameness”? Will there be investigations of the writing of reports?
- Question: How are contradictory statements by police on Use of Force reports and/or between

4. There needs to be more accountability throughout the chain of command to ensure thorough investigations and the honest, full, and accurate completion of use of force reports. Consequences and formal discipline when falsifying reports should be clearly outlined and understood by all officers and law enforcement personnel.

written reports and interviews are handled? I understand this is a 3rd-class felony. Who is the chain of command investigates? Who is held accountable?

- Question: What happens if information on Use of Force reports is purposely misstated or misleading during the course of the investigation? If this is discovered what happens next in the investigation and who is held accountable? Civilians expressed concern about officers' documentation of Use of Force cases and felt it could not be trusted to be completed accurately and honestly. An example was given about a suspect being "roughed up" by the police, and that not being reflected in the officer's report, but was then seen on footage from a helicopter
- Should be clear consequences for violating use of force, reporting use of force and investigating use of force policies.
- Use of Force reports and interviews should be completed out without fabrication.
- Officers need to be held accountable for false reporting, including by omission or changing of facts of the incident.
- PERF #6. Duty to intervene and report Use of Force: Officers should be obligated to intervene when they believe another officer is about to use excessive or unnecessary force, or even when they witness a colleague using excessive or unnecessary force, or engaging in other misconduct. Agencies should also train officers to detect warning signs that another officer might be moving toward excessive use or unnecessary force to intervene *before* the situation escalates.

5. The Use of Force Investigations Policy must include monitoring and accountability procedures for supervisors including:

- Enhanced supervisory review and oversight of investigative reports.
- Supervisor accountability for reporting mistakes or false reporting.
- Support for, and accountability beyond, 1st-line supervisors who identify discrepancies and concerns.

- The issue of documenting the changes made to police reports as investigations unfold for internal integrity review and assessment -- as well as for the public record -- was consistently raised. Each time the issue was raised, the officer response was that such a record is not kept, nor is there systematic assessment of this kind.
- Supervisors and other appropriate law enforcement personnel must keep a record of all revisions made to investigative reports, who makes them, and why the revisions were made.
- Supervisors need to be more involved in the process, given they sign off on reports.
- Supervisors should not sign off on reports until all investigations are complete.
- Officers indicated that specialized units, such as Homicide, Domestic Violence, Sex Crimes, etc., are engaged in ongoing investigations, and that signing off on reports must happen as the investigation proceeds. It is not possible to wait until the investigation is "complete" to sign off on reports.
- Supervisors indicated that the standard use of force investigations have become too rote and comfortable.

5. The Use of Force Investigations Policy must include monitoring and accountability procedures for supervisors including:

- Enhanced supervisory review and oversight of investigative reports.
- Supervisor accountability for reporting mistakes or false reporting.
- Support for, and accountability beyond, 1st-line supervisors who identify discrepancies and concerns.

- Supervisors indicated that supervisors need to closely read, be able to explain, and assess reports before signing off, and be held accountable and subject to discipline for discrepancies in reporting.
- 1st-line supervisors need to know they are going to have support from supervisors up the chain-of-command in raising reporting and investigative concerns.
- PERF #10 Document use-of-force incidents, and review your data and enforcement practices to ensure that they are fair and non-discriminatory.
- The car chase [or, vehicle pursuit November 29, 2012] that ended with the death of Timothy Russell and Malissa Williams is an example of excessive use of force and one in which the supervisors were not effective. How are they held accountable in Use of Force cases?
- Supervisors, where appropriate, should also be investigated and held accountable for their roles in Use of Force incidents.

6. The Cleveland Division of Police needs to clearly state and enforce discipline and punishment for not following the Use of Force investigations' policy.

- What happens if investigations' policy is not followed? Police response: "No decision has been made on punishment and discipline."
- Clear discipline available when officers break Use of Force or Use of Force investigations' policy -- even when it doesn't rise to criminal level. A bad employee may not belong in jail, but may not deserve their job either.
- At the appropriate time personal liability should be a part of the process. Police should be held to the standard of training given. Failure to uphold training standard should result in penalties ranging from loss of pay to loss of employment throughout the chain of command.

VI. Use of Force Investigations Recommendations

1. To build understanding, trust, and investigative integrity, CDP must be in consistent communication with the public on Use of Force investigations, including:

- Articulating clear processes for civilians to report Use of Force
- Issuing regular reports to the public that documents incidents, analyzes trends, and points out discrepancies regarding Use of Force. (PERF #11)

- Civilians need a clearly articulated process for reporting use of force incidents.

1. To build understanding, trust, and investigative integrity, CDP must be in consistent communication with the public on Use of Force investigations, including:

- Articulating clear processes for civilians to report Use of Force
- Issuing regular reports to the public that documents incidents, analyzes trends, and points out discrepancies regarding Use of Force. (PERF #11)

- CDP needs to proactively inform people on process for filing use of force complaints.
- Officer Use of Force reports should be sent to the persons involved in the incident to be able to review the details of the incident.
- When there are canny similarities in officer' statements and investigative reports, the Prosecutor should make public these discrepancies. This speaks to public concerns of integrity and false reporting, and ultimately accountability.
- The City is too slow in releasing records.
- When use of force investigations occur the police need to get as much information out right away
- Police indicated need to enhance communication with the public and do so on a consistent basis.
- When Use of Force reports become public record, the reports should be routinely or automatically shared so they can be easily attained by the public.
- The Cleveland Community Police Commission should look into considering developing a mechanism for ensuring routine and timely sharing of information regarding Use of Force investigations.
- PERF #13: Agencies need to be transparent in providing information following use of force incidents
- Centralized location of data is more appropriate for data storage
- Officer badge numbers should always be visible.

2. Investigators independent of the City of Cleveland or County of Cuyahoga should be responsible for overseeing Use of Force investigations, until that time when the public can be sure an independent Inspector General can assure investigations of use of force were completed fairly, honestly and thoroughly.

- Query and doubt that internal investigations could be trusted.
- People have consistently stated that they feel the camaraderie of police officers is solid, and raised questions about the police investigating the police as a result. For instance, questions included: So how can you have them investigating each other? How do you break this up? Are there any models from other cities that the Cleveland Community Police Commission can look at?
- Concerned about the FIT Team being under IA, and Sheriff's department: Actually, you need someone away from the police culture that would not be swayed by peer pressure.
- Investigators independent of the City of Cleveland should be involved in the investigations of use of force.
- Level 3 use of force investigations should include an independent investigator.
- A speaker stated in reference to the Sheriff's office taking over investigations of Cleveland

2. Investigators independent of the City of Cleveland or County of Cuyahoga should be responsible for overseeing Use of Force investigations, until that time when the public can be sure an independent Inspector General can assure investigations of use of force were completed fairly, honestly and thoroughly.

deadly use of force, that he personally believed there is no difference between the Sheriff's department and the Cleveland police doing an investigation. The Sheriff's department, he stated, represented the "same people, just wearing different hats. Another snow job. Baloney." Investigators outside of the city and county are necessary.

- There should be a special prosecutor appointed or someone from the DOJ to investigate excessive and deadly uses of force.
- Independent forensics, investigation coroner and federal prosecutor should be involved in investigations.
- Special prosecution, independent of the City of Cleveland and County of Cuyahoga should be assigned to any use of force incident that resulted in the death of a person due to the officer's use of force.
- In the case of Level 3 Use of Force investigations, it should automatically go to an independent prosecutor appointed by the congressperson in the congressional district where the individual was killed or beaten by the police.
- Investigators, independent of the Cleveland Police Department, should be make up the FIT Team.
- PERF #12 All critical police incidents resulting in death or serious injury should be reviewed by specially trained personnel in a law enforcement agency outside of the City of Cleveland or County of Cuyahoga.

3. Independent investigators and agencies need to be held accountable to the standards and mandates of the Consent Decree and proposed investigative policy changes, including but not limited to the Sheriff's Department.

- As agents of the Cleveland police, will the Sheriff's Department be held accountable and be subject to the terms of the Consent Decree?
- With regard to the Sheriff's Department doing investigations, we should have an independent persons and/or civilian investigators to be on that team as well? If you are going to have an independent and/or civilian investigator on the Cleveland Police Department's Level 3 FIT Team, then you also need to have the same on the Sheriff's Department investigative team.
- Will this relationship between the Sheriff's Department and Cleveland Police survive a single administration, and how will it be managed to ensure adequate and fair investigations of deadly, fatal Use of Force cases?

4. The FIT team, which investigates Level 3 Use of Force incidents, should be composed of not just police personnel but possibly the Medical Examiner and more civilians, including: Office of Professional Standards (OPS) investigators and non-city employed civilians who have experience or have received training in Use of Force investigations. These non-police personnel should arrive on the scene as soon as possible.

- FIT should respond within 45 minutes of force used.
- Most incidents that happen between police and community people happen at night. The first on the scene are uniformed officers. Everything else in the investigation is based on what they find out after the uniforms are on the scene. Whoever investigates this, the earlier they get involved, the better. At 3 a.m. do you get that person (e.g., OPS investigator, civilian investigator, IG, etc.) involved like Homicide? If they get involved too late, then it won't have any impact.
- We need clarification and a clear statement about not only who IS INCLUDED on FIT Team, but who IS EXCLUDED from the FIT Team.
- Paragraph 112 in the Consent Decree says OPS investigators are mentioned. Will they be able to observe, even though they can't contribute to the findings? Why are they there? What is their role?
- What is the role of the OPS investigator on the scene? Oversight?
- Why doesn't OPS, as the only civilian entity identified in the process, participate in the criminal investigations? What prevents them from participating?
- FIT teams, for consistency sake, should always include an OPS investigator as a regular part of the team.
- FIT should include more civilians.
- it is problematic to have CDP officers at all on the FIT Team.
- FIT should include independent investigators and community activists.
- Discussion on including the Medical Examiner as part of the FIT team.

5. The City Charter and internal operations manual needs to reflect significant changes to the Office of Professional Standards' role with use of force investigations.

- The City Charter, including sections referencing the Civilian Police Review Board and OPS, should incorporate the inclusion of civilian investigators in criminal cases.
- The Internal Operations Manual of the Civilian Police Review Board and OPS should clearly articulate the OPS investigators' participation on the FIT Team and their role in Use of Force investigations.

6. Capture evidence orally on the scene as quickly as possible through third-party and independent personnel.

- One suggestion included deploying a court stenographer immediately to lethal force crime scene.
- An oral/tape-recording should be made within the hour of all crimes, on-scene.
- A detailed report should be written and filed within 24 hours of by the end of the shift.
- Separate officers involved Use of Force incident from officer witnesses and civilians. Isolate until investigations team arrives.
- During reporting and investigations, there should always be a third party to witness.

7. There needs to be independent, civilian review of body camera footage in Use of Force investigations.

- Police-issued body cameras protect both the public and police officers.
- How are police-issued body cameras used in the investigative process? This needs to be made clear and outlined.
- Whose story and vantage point is recorded?
- Query about who reviews police-issued body camera footage? An example was given of girls who “were accosted outside Collinwood High School” and “an officer accused one of the girls of kicking him.” She was charged with this. But when the footage was reviewed, it was clear that her leg was hyperextended and the arc of her leg was not a natural kick, but rather that she had been thrown to the ground. “In essence the judge concurred with activists that her leg went up and out as a direct result of being lifted and slammed to the ground by the officer on the scene. This is one of the advantages of citizen input.”
- A suggestion was then made that the CPC should be involved in reviewing police-issued body camera footage.
- When does police-issued body camera footage go to an independent reviewer?
- Any civilians engaged in the review of body camera footage must receive training.

8. Level 1 and Level 2 uses of force investigations should be audited at least annually, at most quarterly by an investigator independent of the City, until that time when the public can be sure an independent Inspector General can assure investigations of use of force were completed fairly, honestly and thoroughly.

- There should be a random, periodic review of Level 1 and Level 2 use of force by independent investigators
- PERF #13: Provide prompt supervisory response training to critical incidents to reduce the likelihood of unnecessary force.

9. Protocols for independent assessment and treatment of law enforcement being investigated for Use of Force need to be clearly outlined and publicly shared.

- Query regarding whether officers are evaluated by in-house or independent medical professionals.
- Query regarding whether in-house psychologists are independent enough.
- Query regarding whether it is true that police are given 24 hours before they can be interviewed after a deadly use of force incident?
- Concern raised about police officers receiving unfair, different treatment during the investigation of Use of Force incidents versus the general public.
- When police break policy, it should be considered a criminal act.
- Officers should be suspended without pay when under investigation for excessive use of force.
- The psychologists that police talk to after a use of force incident should be independent of the city

9. Protocols for independent assessment and treatment of law enforcement being investigated for Use of Force need to be clearly outlined and publicly shared.

- Officers should be drug tested by independent personnel whenever there is a question of excessive, deadly, or fatal use of force.

VII. Use of Force Investigations: General Comments

1. Garrity Standard & Investigative Process

- How is Garrity v Miranda applied in Use of Force investigations for police officers?
- Garrity impedes Use of Force investigations.
- There should be a Garrity-like standard developed for civilians if you want them to cooperate, without fear of retaliation or self-incrimination, in Use of Force investigations.

2. Medical Health Concerns during Use of Force Incidents: Investigations should include whether police provided appropriate medical attention and/or treatment to Use of Force victims.

- Concerns were expressed about the treatment of Use of Force victims.
- How this should be connected to Use of Force investigations?
- Police should be trained in CPR and provide basic first aid.
- A concern was expressed over using pepper spray on someone with asthma.
- Water should be supplied in police cars so officers can as soon as possible appropriately flush their eyes.
- An ambulance should be called for police Use of Force incidents where mental health is a factor. Police transport criminalizes mental illness.

3. De-escalation, Hiring, Prevention

- Officers need more de-escalation training to prevent Use of Force. There should be more preventative measures to avoid escalation strategies. This includes vehicle pursuit policies.
- Police should be civil, introduce themselves, ask if they can help, not jump in and pull a gun. Police are very quick to escalate a situation, and this can lead to Use of Force.
- Officers with control or ego issues should be weeded out of policing during the hiring process.
- There is technology that can track when a gun is unholstered.
- Police should be trained in CPR
- There is concern over using pepper spray on someone with asthma
- An ambulance should be called for police incidents where mental health is a factor. Police transport criminalizes mental illness

4. Protocols need to be developed and enforced regarding collective bargaining agreements, as well as union representation in the investigative process, to ensure the integrity and effectiveness of investigations and their outcomes.

- Union representatives should not be present at the investigation of use of force. They can be with the officer being investigated to offer support but should not have the opportunity to “piece together a story.”
- Collective bargaining agreements should not protect officers from facing disciplinary actions against them should their actions result in the death of a person while having been found violating any police policy or rule.
- Frustrating to see the collective bargaining agreement undermining discipline after investigation of use of force cases. The City participates in the negotiation of these agreements, and must take greater responsibility in what it negotiates and agrees to.
- If the collective bargaining agreement trumps the City and police department investigations with Use of Force, what use is this entire process?
- The CBA and the CPPA here are so powerful, they seem to be able to trump disciplinary and other decisions, and this is troubling.
- The impact and effectiveness of these use of force policy changes – whether the general policy or the investigations policy – are questionable, and potentially moot, if the CBA is always getting cases overturned.
- Question: Will Frank Garmback, involved in an excessive, fatal use of force case, be allowed to continue to train officers in investigations and Use of Force? Will Timothy Loehman be returned to the field with his gun?
- There needs to be better police contracts since that is often cited as the reasoning behind inaction or lack of disciplinary action in Use of Force investigations involving officers.

VIII. OTHER COMMENTS: (Note: The comments below also should be considered.)

Other Questions posed:

- Is there, or what is, the difference between the stated protocol and what actually happens with Use of Force investigations?
- “After action reviews” need to be cleared explained.

Other General Comments:

- There is a major flaw in this process: No holistic view of justice. We are trying to fix one small part of a systematic problem.
- Group discussed the recommendation that after a pursuit, if an arrest needs to be made, that it be done by another police officer, if at all feasible, to avoid the impact of adrenaline on the part of the police officer involved in the chase, which could contribute to excessive Use of Force.
- Question asked about if taxpayer money is used to cover individuals, is this a backlash to the consent decree? Reference made to an article/editorial in the *Washington Post*, “Cleveland's Vile Embarrassing Scheme to Avoid Paying Victims.”

Use of Force Reporting:

- Report all excessive and lethal Use of Force cases to federal authorities.
- What goes in report should go to grand jury, prosecution, and indictments.