Independent Monitoring Report 12 Use of Force Compliance Assessments by Paragraph

Specific compliance assessments, by paragraph, for the Use of Force section are available here. This includes paragraphs where the City gained or lost compliance in the twelfth reporting period, as well as paragraphs with significant developments toward or away from compliance. A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Use of Force section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): https://cpd-monitoringteam.com/imr-8-1/.

153. CPD's use of force policies, as well as its training, supervision, and accountability systems, must ensure that: CPD officers use force in accordance with federal law, state law, and the requirements of this Agreement; CPD officers apply de-escalation techniques to prevent or reduce the need for force whenever safe and feasible; when using force, CPD officers only use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; and any use of unreasonable or unnecessary force is promptly identified and responded to appropriately.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FOURTH REPORTING PERIOD)

Secondary: In Compliance (NEW)
Full: Not Yet Assessed

In the twelfth reporting period, the City and the CPD achieved Secondary compliance with ¶153.

To assess Preliminary compliance with ¶153, the IMT reviewed the CPD's use-of-force policies to ensure that they are in accordance with law and the Consent Decree and appropriately address use of de-escalation. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶153, the IMT reviewed the CPD's use-of-force training materials and records for completion of training as it relates to the requirements of the Consent Decree.

Specifically, the IMT reviewed CPD's promotional and in-service training, which covers de-escalation techniques and the investigation of use of force incidents among other things. The IMT also reviewed CPD's Incident Debriefing Report (IDR) Supervisory Dashboard, which contains advisements and recommendations from TRED and front-line supervisors about uses of force, TRRs, firearm-pointing incidents, and foot pursuits. The dashboard contains the officer's name, the nature of the advisement/recommendation, the date, TRR number, event numbers, whether an officer has multiple advisements and recommendations, and whether progressive training is recommended either by the district lieutenant or by TRED. Additionally, according to recently revised policies, the Watch Operations Lieutenant (WOL) is required to access the dashboard to review any TRRs and firearm pointing incidents. The CPD provided attendance records demonstrating that 95% of its officers completed the eLearning on the Supervisory dashboard in April 2025. The IDR Supervisory Dashboard allows district supervisors to assess any

The City and the CPD produced their in-service training and IDR Supervisory Dashboard eLearning to the parties this reporting period.

patterns and trends that may develop within units or with individual personnel. The dashboard also acts as a system for accountability with CPD policy. The City and the CPD have achieved Secondary compliance with ¶153 as a result of 95% of officers receiving training on the IDR Supervisory Dashboard.

To assess Full compliance with ¶153, the IMT will assess the implementation and supervision of the use of force policies by department personnel. For this assessment, the IMT will review supervision at the district-level, by the Tactical Review and Evaluation Division (TRED), by CPD command staff, and by COPA to determine if supervision and accountability systems are effective, specifically that supervisors are reviewing the IDR dashboard as required and, when corrective action is necessary, that action is being taken. Paragraph 153 also requires that any unreasonable or unnecessary use of force is "promptly identified." Accordingly, the IMT will also review the CPD's efforts and progress toward lessening the backlog of IDRs awaiting review by TRED when assessing Full compliance with ¶153.3

In conclusion, the CPD achieved Secondary compliance for ¶153. Moving forward, the IMT will monitor the CPD's efforts to establish a system of accountability for compliance with use of force policies, including accountability by supervision at the district-level, by TRED, CPD command staff, and COPA. Full compliance will require that supervisors access the IDR Supervisory Dashboard as required by CPD policy and take remedial action as needed.

Paragraph 153 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD FIFTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary

SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS:

Preliminary

TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:

Not Applicable

JULY 1. 2021 - DECEMBER 31. 2021 COMPLIANCE PROGRESS: Preliminary

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS:

Preliminary

ELEVENTH REPORTING PERIOD TWELFTH REPORTING PERIOD JULY 1, 2024 - DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS:

Under Assessment

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

The Tactical Review and Evaluation Division (TRED) was formerly called the Force Review Division (FRD) and the Force Review Unit (FRU).

The City, the CPD, the OAG, and the Coalition are currently meeting to discuss the rise in numbers of use-of-force incidents since 2022, the reasons behind the increases, and the City's and the CPD's plans ahead.

156. CPD's use of force policies and training, supervision, and accountability systems will be designed, implemented, and maintained so that CPD members: a. act at all times in a manner consistent with the sanctity of human life; b. act at all times with a high degree of ethics, professionalism, and respect for the public; c. use de-escalation techniques to prevent or reduce the need for force whenever safe and feasible; d. use sound tactics to eliminate the need to use force or reduce the amount of force that is needed; e. only use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; f. only use force for a lawful purpose and not to punish or retaliate; g. continually assess the situation and modify the use of force as circumstances change and in ways that are consistent with officer safety, including stopping the use of force when it is no longer necessary; h. truthfully and completely report all reportable instances of force used; i. promptly report any use of force that is excessive or otherwise in violation of policy; j. are held accountable, consistent with complaint and disciplinary policies, for use of force that is not objectively reasonable, necessary, and proportional under the totality of the circumstances, or that otherwise violates law or policy; and k. act in a manner that promotes trust between CPD and the communities it serves.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (NINTH REPORTING PERIOD)

Secondary: In Compliance (NEW)
Full: Not Yet Assessed

In the twelfth reporting period, the City and the CPD achieved Secondary compliance with ¶156.

To assess Preliminary compliance with ¶156, the IMT reviewed the CPD's use-of-force policies to ensure policies and systems meet the requirements of this paragraph. Paragraph ¶156 addresses many sections of the Consent Decree, including short- and long-term efforts. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its use of force policies and *Foot Pursuits* policy.

To assess Secondary compliance, the IMT reviewed the CPD's use-of-force training materials and records specific to the requirements of ¶156.

Specifically, the IMT has reviewed CPD's training submissions for recruit, promotional, and in-service training over the duration of the consent decree. The CPD has delivered training addressing the thirteen subsections of ¶156 consistently, and the CPD and COPA have systems in place to hold officers accountable as required by ¶156(j).

As discussed above with respect to ¶153, the IDR Supervisory Dashboard provides a mechanism to measure adherence to policy and establish an accountability system. In our assessment, the IDR Supervisory Dashboard provides the CPD supervisors with the ability to address officer deficiencies, as well as to track progressive training for officers with repeated debriefings on the same issue.

To assess Full compliance, the IMT will review evidence of effective supervision and accountability requirements and systems. This may include a review of data and feedback from TRED, BIA, and COPA, evidence of supervisory reviews of TRRs, and CPD member interviews. The IMT has also requested data on the reporting of excessive force to further assess ¶156(i). Paragraph 156(j) also requires that officers be held accountable for use of force that is not objectively reasonable. The significant backlog of IDRs awaiting review by TRED impacts this requirement. As a result, the IMT will assess the CPD's progress toward clearing the backlog when considering Full compliance with this paragraph. The IMT will also assess whether supervisors are utilizing the IDR Supervisory Dashboard to review TRRs and firearm pointing incidents and ensuring that corrective actions are taken when warranted.⁴ We look forward to reviewing data or additional information on these requirements to comprehensively assess all aspects of ¶156.

As a result of training and the implementation of the IDR Supervisory Dashboard, the City and the CPD achieved Secondary compliance with ¶156. We look forward to continuing to monitor progress with attention to Use of Force supervision through maintained feedback and accountability requirements and systems.

Paragraph 156 Compliance Progress History

FIRST REPORTING PERIOD SECOND REPORTING PERIOD THIRD REPORTING PERIOD MARCH 1, 2019 - AUGUST 31, 2019 SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: Not Applicable Not Applicable **Under Assessment** FOURTH REPORTING PERIOD FIFTH REPORTING PERIOD SIXTH REPORTING PERIOD JANUARY 1. 2021 – JUNE 30. 2021 JULY 1. 2021 - DECEMBER 31. 2021 JANUARY 1, 2022 - JUNE 30, 2022 COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: Under Assessment Under Assessment Under Assessment SEVENTH REPORTING PERIOD EIGHTH REPORTING PERIOD NINTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 JULY 1, 2022 – DECEMBER 31, 2022 JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: Under Assessment Under Assessment Preliminary TENTH REPORTING PERIOD ELEVENTH REPORTING PERIOD TWELFTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 JULY 1, 2024 - DECEMBER 31, 2024 JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: COMPLIANCE PROGRESS:

Preliminary

Secondary

Preliminary

As referenced above, the City, the CPD, the OAG, and the Coalition are currently meeting to discuss the rise in numbers of use-of-force incidents since 2022, the reasons behind the increases, and the City's and the CPD's plans ahead.

158. CPD's use of force policies must comply with applicable law and this Agreement, reflect the objectives described above, and promote trust between CPD and the communities that it serves.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FOURTH REPORTING PERIOD)

Secondary: In Compliance (NEW)
Full: Not Yet Assessed

In the twelfth reporting period, the City and the CPD achieved Secondary compliance with ¶158.

To assess Preliminary compliance with ¶158, the IMT reviewed the CPD's Use of Force policies related to community engagement, and plans and efforts by the CPD to address suggestions from the community. The CPD achieved Preliminary compliance with ¶158 in the fourth reporting period following revisions to the Use of Force policies. At the end of the eighth reporting period, the CPD issued revised versions of its Use of Force policy suite. In our monitoring report for that period, we noted that building trust with the community required a plan and process for community engagement with CPD's use of force policies that meets the needs of both the CPD and the community.

To assess Secondary compliance, the IMT reviewed the CPD's use-of-force training materials and records, focusing on whether training complies with applicable law and the Consent Decree, promotes use of force behavior that promotes trust with the community, and how training reflects input/changes from community feedback. The IMT specifically reviewed the 2025 *In-Service Supervisor Training*. The IMT also reviewed CPD's community engagement policy and plan notes, and CPD's community engagement plan framework and 2025 plan. Finally, the IMT also reviewed S02-08, *Community Engagement in Policy and Training Development* which was finalized during the twelfth reporting period.

To assess Full compliance, the IMT will evaluate whether the CPD is engaging with the community according to its revised policies and plans. Additionally, the IMT will review aggregated data from TRRs and other sources to determine whether CPD's Use of Force policies promote the objectives of the Consent Decree and promote trust from the community.

The City and the CPD achieved Secondary compliance with ¶158 this reporting period.

Paragraph 158 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:

Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Preliminary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:

Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Under Assessment

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS:
Preliminary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS:

Secondary

160. CPD will establish and maintain clear channels through which community members can provide input regarding CPD's use of force policies and propose revisions or additions to those policies. CPD will regularly review the input received, including during the biennial review process.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (NEW)
Secondary: Not in Compliance
Full: Not in Compliance

In the twelfth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶160.

To evaluate Preliminary compliance, the IMT reviewed the CPD's community engagement efforts related to its use-of-force policies. In assessing community engagement, we examined (1) outreach; (2) meetings, interactions, problem-solving, and decision-making; (3) follow-up and sustainability of partnerships, trust, community policing, and problem-solving activities; and (4) general police-community interactions regardless of context.

Since the Consent Decree took effect, the CPD has been in continuous discussion with the IMT, the OAG, and the community about its use-of-force policies and the best way to maintain clear channels of communication. As detailed in prior reports, the CPD began consulting with the *Use of Force Working Group* in June 2020 and has made substantive changes to policy and training materials as a result of these discussions.

This reporting period, the CPD published and implemented S02-08, *Community Engagement in Policy and Training Development*.⁵ This policy outlines the CPD's guidelines, procedures, and responsibilities for engaging community and CPD members in the development of CPD policies and training. The policy is thoughtful and recognizes not only the need to engage the community up front in policy development, but also the need to provide consistent follow-up on the community's suggestions. It also recognizes that there are many ways to approach engagement and, therefore, contemplates a multi-pronged approach. Additionally, the CPD shared its *Community Engagement Plan*, a comprehensive framework the CPD intends to utilize to incorporate community engagement in various areas. As a result, the CPD has achieved Preliminary compliance in the twelfth reporting period.

This reporting period, *Community Engagement in Policy and Training Development*, transitioned from Department Notice D22-08 (effective December 31, 2022) to Special Order S02-08 (effective June 30, 2025).

To assess Secondary compliance, the IMT will review materials and plans for trainings on newly effective policy S02-08. The IMT also looks forward to receiving community feedback on any training materials on this new policy, as well as records demonstrating 95% completion of training.

To assess Full compliance, the IMT will review materials demonstrating that the City and the CPD have established clear channels for community feedback on the CPD's Use of Force policies, including evidence of webpages soliciting community feedback, public information campaign materials, and evidence of regular engagement with community groups on CPD's Use of Force policies.

In conclusion, the City and the CPD achieved Preliminary compliance with ¶160. The IMT appreciates the CPD's continued engagement and commitment to working with the community on its Use of Force policies. Moving forward, the IMT will monitor the CPD's efforts to train on the community engagement and use of force policies, as well as evidence that community engagement was incorporated into such training materials.

Paragraph 160 Compliance Progress History

FIRST REPORTING PERIOD

None

JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:

JULY 1, 2021 – DECEMBER 31, 2021

JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

None

SEVENTH REPORTING PERIOD JULY 1, 2022 - DECEMBER 31, 2022 COMPLIANCE PROGRESS: Under Assessment

TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Under Assessment

SECOND REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020

None

compliance progress: Under Assessment

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Under Assessment

ELEVENTH REPORTING PERIOD JULY 1, 2024 — DECEMBER 31, 2024 COMPLIANCE PROGRESS: Under Assessment

THIRD REPORTING PERIOD COMPLIANCE PROGRESS: COMPLIANCE PROGRESS: COMPLIANCE PROGRESS:

None

Under Assessment

NINTH REPORTING PERIOD IUI Y 1 2023 - DECEMBER 31 2023 COMPLIANCE PROGRESS: Under Assessment

TWELFTH REPORTING PERIOD JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: **Preliminary**

168. Starting no later than January 1, 2019, CPD will track and analyze the frequency with which CPD officers engage in foot pursuits of persons attempting to evade arrest or detention by fleeing on foot, regardless of whether the foot pursuit is associated with a reportable use of force incident. CPD will track foot pursuits associated with reportable use of force incidents through TRRs or any similar form of documentation CPD may implement.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (SEVENTH REPORTING PERIOD)
Secondary: In Compliance (SEVENTH REPORTING PERIOD)

Full: In Compliance (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶168.

To assess Preliminary compliance with ¶168, the IMT assessed the CPD's policies and practices for data collection and analysis related to foot pursuits, as required by this paragraph. To assess Secondary compliance, the IMT reviewed the CPD's foot pursuit training sources and records to determine whether the CPD had sufficiently trained on its latest policies. To assess Full compliance, we assessed whether the CPD has developed and implemented a plan to track and evaluate foot pursuits, as well as evidence that CPD officers are properly reporting foot pursuits.

The CPD made additional progress during the twelfth reporting period. Specifically, the CPD's Audit Division produced a report in May 2025 that analyzed CPD reporting narratives obtained from 1035 assorted arrest reports, ISRs and TRRs for a sixmonth period from July 2023 through December 2023. The Audit Division identified 24 instances during that time period during which officers failed to document a foot pursuit by submitting a separate pursuit form as required. That data was then provided to TRED, which found that 11 of the 24 instances were correctly identified as having missing pursuit forms, and of those 11, TRED had identified 3 of them previously and issued recommendations.

The IMT also reviewed TRED's 2024 Year-End Report and 2023 Year-End Report. The 2023 Year-End Report indicates that 5,361 foot pursuit reports were generated, of which there were 314 (5.8%) debriefing points for not completing a foot or bicycle pursuit report.⁶ The 2024 Year-End Report notes that of 6,248 foot pursuit reports, 372 (5.9%) debriefings were issued for the failure to complete a

TRED's 2023 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2024) at 42, https://www.chicagopolice.org/wp-content/uploads/Tactical-Review-and-Evaluation-Division-Year-End-Report-2023.pdf.

foot/bicycle pursuit report. These indicate a combined total of 11,609 foot or bicycle pursuits occurred during those years. Of that number, 686 (5.9%) were not documented in a pursuit form. This data shows that since the CPD passed its revised G03-07, Foot Pursuits policy in August 2022 which required the completion of a Foot/Bicycle Pursuit Report, the majority of foot pursuits conducted by CPD officers are being documented and tracked in accordance with that policy.

The IMT also reviewed data in the CPD's IDR Supervisory Dashboard. 8 Specifically, the Dashboard indicated that in the same six-month period covered by the Audit Division, there were 6,552 foot pursuits and 117 debriefing points for foot pursuits. The IMT also reviewed evidence of supervisory review of documentation of foot pursuits and determined that supervisors were appropriately addressing deficiencies in reporting. This evidence of an effective and meaningful "feedback loop" enabled the CPD to achieve Full compliance with ¶168.

In conclusion, the City and the CPD achieved Full compliance for ¶168.

Paragraph 168 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Preliminary

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

None

SEVENTH REPORTING PERIOD JULY 1, 2022 — DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary

TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary

FIFTH REPORTING PERIOD JULY 1, 2021 - DECEMBER 31, 2021 COMPLIANCE PROGRESS:

None

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary

ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS: Secondary

SIXTH REPORTING PERIOD JANUARY 1, 2022 - JUNE 30, 2022 COMPLIANCE PROGRESS: Under Assessment

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: Full

TRED'S 2024 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2025) at 44, https://www.chicagopolice.org/wp-content/uploads/2024-YEAR-END.pdf.

The IMT notes that some of its monitors have lost access to the IDR Supervisory Dashboard. The IMT has made the City and the CPD aware of this access issue on several occasions and looks forward to the issue being addressed in the next reporting period so that the IMT may continue to have access to the data it needs to assess compliance.

171. CPD will provide scenario-based training regarding foot pursuits and the supplemental foot pursuit training bulletin during the first annual use of force training required by this Agreement.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (SIXTH REPORTING PERIOD)
Secondary: In Compliance (NINTH REPORTING PERIOD)

Full: In Compliance (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶171.

To assess Preliminary compliance with ¶171, the IMT reviewed the CPD's annual use of force training curriculum to determine whether it incorporated scenario-based training on foot pursuits and whether the CPD looked at examples of how other jurisdictions may have done so. We also assessed whether the CPD's annual De-Escalation, Response to Resistance, and Use of Force in-service training included new requirements or restrictions for foot pursuits consistent with CPD policy through scenario-based training.

To assess Secondary compliance, the IMT reviewed relevant training courses and attendance records. The CPD has consistently provided training in foot pursuits with scenario-based elements over the course of several years. The CPD's 2019, 2020, and 2021 Use of Force Trainings contained in-person content wherein officers participated in scenarios and a debriefing discussion. The 2022 and 2024 Foot Pursuit Policy Program eLearnings contained online scenarios that simulated radio traffic of foot pursuits, and the 2022 De-escalation, Response to Resistance, and Use of Force In-Service Training included in-person scenarios.

To assess Full compliance with ¶171, the IMT reviewed evidence of data analyses on foot pursuits in training development and training evaluation materials. Specifically, this reporting period, the CPD provided training materials for the 2025 De-Escalation, Response to Resistance Use of Force, and High-Risk Transitional Vehicle Stops Training, which included evaluation materials. The IMT appreciates the CPD's training materials on foot pursuits. Given officer attendance of training, the inclusion of scenario in these trainings, and instructor evaluations, the CPD has achieved Full compliance.

In conclusion, the City and the CPD achieved Full compliance with ¶171 in this reporting period. The IMT will continue to review the CPD's continued training on foot pursuits, which will be informed by the data on foot pursuits that the CPD is collecting and analyzing.

Paragraph 171 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 — AUGUST 31, 2019 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Under Assessment

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Secondary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 — DECEMBER 31, 2021
COMPLIANCE PROGRESS:

Under Assessment

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS:

Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Secondary

THIRD REPORTING PERIOD

MARCH 1, 2020 — DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

178. CPD officers are prohibited from using carotid artery restraints or chokeholds (or other maneuvers for applying direct pressure on a windpipe or airway, i.e., the front of the neck, with the intention of reducing the intake of air) unless deadly force is authorized. CPD officers must not use chokeholds or other maneuvers for intentionally putting pressure on a person's airway or carotid artery restraints as take-down techniques.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FOURTH REPORTING PERIOD)
Secondary: In Compliance (SIXTH REPORTING PERIOD)

Full: Under Assessment

In the twelfth reporting period, the City and the CPD are under assessment for Full compliance with ¶178.

To assess Preliminary compliance with ¶178, the IMT reviewed the CPD's use-of-force policies to ensure they address requirements specified in this paragraph regarding use of carotid artery restraints or chokeholds. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its use-of-force policies.

To assess Secondary compliance with ¶178, the IMT reviewed the CPD's use-offorce training materials and attendance records to determine whether the CPD has sufficiently trained on its latest policies.

To assess Full compliance with ¶178, the IMT will review various data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes the TRED's review of such incidents in mid-year and year-end reports (all deadly force incidents, shootings, head strikes, and chokeholds).

The IMT requires additional information from the City and the CPD to make its compliance determination for this paragraph. The IMT appreciates that the CPD's current policy G03-02 *De-escalation, Response to Resistance, and Use of Force* prohibits all carotid artery restraints and chokeholds, which is even more restrictive than the Consent Decree requires. *Compare* G03-02 Section IV.D.3 (prohibiting CPD members from using carotid artery restraints except as an act of last resort) and ¶178 (prohibiting CPD members from using carotid artery restraints "unless deadly force is authorized.") The CPD's policy examines any motion near the neck area to later determine intent. Any contact that is made near the neck area is examined by a street deputy and the FRB to confirm whether an officer's actions resulted in a chokehold.

However, there appears to be a discrepancy in the data on the CPD's use of chokeholds that requires resolution before additional compliance can be assessed. TRED's mid-year and year-end reports, as well as CPD's annual use-of-force reports. The IMT notes a discrepancy in the data on chokeholds included in these two reports: the 2024 Annual Use of Force Report indicates that 18 chokehold incidents occurred during a level 3 use of force, 9 whereas TRED's 2024 Year-End Report indicates 14 cases with chokeholds, three of which were discussed before the Force Review Board (FRB). 10 Additionally, the IMT previously requested additional data from BIA and COPA about reports or complaints of CPD officers' use of chokeholds. The IMT has not yet received these data.

In conclusion, the City and the CPD is Under Assessment with the requirements of ¶178. The IMT will continue to monitor these incidents. While the IMT examined COPA case data, we have yet to receive a response to our request for more information on allegations of chokeholds. We look forward to determining if other entities (e.g., BIA, COPA, or the City's Law Department) have received complaints.

Paragraph 178 Compliance Progress History

FIRST REPORTING PERIOD COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD COMPLIANCE PROGRESS:

Preliminary

JULY 1, 2022 - DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary

COMPLIANCE PROGRESS: Secondary

SECOND REPORTING PERIOD MARCH 1, 2019 - AUGUST 31, 2019 SEPTEMBER 1, 2019 - FEBRUARY 29, 2020 MARCH 1, 2020 - DECEMBER 31, 2020 COMPLIANCE PROGRESS:

None

FIFTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 JULY 1, 2021 – DECEMBER 31, 2021 JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Preliminary

JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary

TENTH REPORTING PERIOD ELEVENTH REPORTING PERIOD

JANUARY 1, 2024 – JUNE 30, 2024

JULY 1, 2024 – DECEMBER 31, 2024 JULY 1, 2024 - DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS:

Under Assessment

SIXTH REPORTING PERIOD COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD EIGHTH REPORTING PERIOD NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

> TWELFTH REPORTING PERIOD JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

See Chicago Police Department 2024 Annual Use of Force Report, CHICAGO POLICE DEPARTMENT (JUNE 30, 2025), at 119, https://www.chicagopolice.org/wp-content/uploads/UseOfForce finalforpublication30July25b.pdf

¹⁰ TRED's 2024 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2025) at 35-36, https://www.chicagopolice.org/wp-content/uploads/2024-YEAR-END.pdf.

156. CPD will clarify in policy that when a CPD officer points a firearm at a person to detain the person, an investigatory stop or an arrest has occurred, which must be documented. CPD will also clarify in policy that officers will only point a firearm at a person when objectively reasonable under the totality of the circumstances.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FIRST REPORTING PERIOD)
Secondary: In Compliance (FOURTH REPORTING PERIOD)

Full: In Compliance (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶189.

To assess Preliminary compliance, the IMT reviewed the CPD's relevant policies, including the CPD's Use of Force policies to ensure they address the requirements specified in ¶189, including CPD's recently revised S03-22, *Firearm Pointing Incidents*. We also evaluated the CPD's efforts to obtain and address community engagement and input on the policy that addresses ¶189's requirements.

To assess Secondary compliance, we reviewed data and documentation to determine whether the CPD has sufficiently trained on its Use of Force policies, including the 2025 In-Service Supervisor Training and the CPD's District-Level Review of Firearm Pointing Incidents Instructional Materials for Captains.

To assess Full compliance, the IMT reviewed the CPD's and the City's timely revisions to S03-22 to comply with Judge Pallmeyer's orders relating to Firearm Pointing Incidents.

As a result of their revisions to S03-22, the City and the CPD achieved Full compliance with ¶189.

Paragraph 189 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:

Preliminary

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:
Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Secondary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:

Secondary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Secondary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Under Assessment

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

193. CPD will ensure that the designated unit at the CPD headquarters level responsible for performing the duties required by this Part has sufficient resources to perform them, including staff with sufficient experience, rank, knowledge, and expertise.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (SECOND REPORTING PERIOD)
Secondary: In Compliance (ELEVENTH REPORTING PERIOD)

Full: Not in Compliance

In the twelfth reporting period, the City and the CPD maintained Secondary compliance with ¶193.

To assess Preliminary compliance, the IMT reviewed the CPD's Use of Force policies to ensure they address the requirements specified in ¶193. Specifically, the IMT reviewed CPD's S03-22, *Firearm Pointing Incidents* policy.

To assess Secondary compliance, we reviewed the CPD's training regarding procedures for TRED and determined that a sufficient number of officers have completed the training.

To assess Full compliance, the IMT evaluated whether TRED has sufficient resources to perform its required duties. In addition to TRED's 2024 Mid-Year and Year-End Reports and other data on TRED staffing levels and expertise to assess the capacities and capabilities of the TRED, the IMT monitored whether TRED has sufficient personnel to consistently meet the 30-day review deadline.

The City and the CPD have maintained Preliminary compliance with ¶193 since achieving it in the second reporting period. The City and the CPD achieved Secondary compliance in the third reporting period and maintained it through the fifth reporting period before losing it in the sixth reporting period due to staff shortages. The CPD achieved Secondary compliance once more in the eleventh reporting period. According to the *2024 Mid-Year Report*, TRED is staffed with one commander, one lieutenant, nine sergeants, 42 review officers, and two tactical review specialists. In a June 2025 meeting, TRED indicated that they currently have 49 review officers.

TRED's 2024 Mid-Year Report, CHICAGO POLICE DEPARTMENT (December 27, 2024) at 47, https://www.chicagopolice.org/wp-content/uploads/2024-MIDYEAR-REPORT-final-27-DEC-24.pdf.

Officers Assigned to TRED, 2023–2025¹²



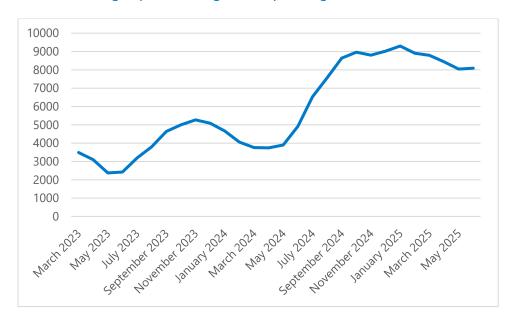
TRED personnel have been sufficiently trained on a number of topics, including LEMART and Officer Wellness and Resilience and the Use of Force Training Program from the Federal Law Enforcement Training Center.¹³

However, TRED has continued to overrun its 30-day deadline for firearm pointing incident reviews since the end of the sixth reporting period, and its backlog continues to grow. At monthly meetings, the CPD routinely updates the IMT on the number of officers assigned to TRED and the status of their case backlog. Although progress has been made, data as of June 26, 2025, indicates a backlog of 8,039 IDRs. The figure below demonstrates the monthly average of IDR backlogs since the report's inception in March 2023. Despite a reduction in 1,384 IDRs in the IDR backlog since January 2025, TRED continues to face a four-month backlog.

Data were obtained from monthly meetings with TRED since July 2023.

¹³ *Id*. at 13.

Incident Debriefing Report Backlog Monthly Average in 2023–2025¹⁴



The IMT continues to appreciate TRED's efforts to review all firearm pointing incidents, and this review is critical to the credibility of the CPD's analysis of firearm pointing overall. While TRED continues to provide the CPD with an extremely valuable service, more could be done given sufficient resources. The IMT continues to suggest that a portion of TRED's workload, *i.e.*, review of use of force documentation, be conducted at the district level. The IMT appreciates that the firearm pointing pilot program indicates that the CPD is following this suggestion but requests that the City and the CPD give thought to additional ways that responsibilities could be shifted from TRED to the CPD district supervisors.

Because of the severity of TRED's lack of resources, the IMT recommended that TRED delegate the responsibility of reviewing firearm pointing incidents to the districts in the eighth reporting period. ¹⁵ In the eleventh reporting period, the CPD created a district-level firearm pointing review pilot program in five districts where captains review firearm pointing incident reports and report their findings to TRED. Captains review "simple" firearm pointing incidents, which are incidents that do not include a foot pursuit or TRR. ¹⁶ This reporting period, the CPD has continued the pilot and has trained eight additional district captains in June 2025 to expand

Data were obtained from monthly meetings with TRED since the inception of the IDR in March 2023.

Paragraph 196 states that "the Monitor will . . . recommend any changes to the process of documenting, reviewing, and analyzing [occurrences of firearm pointings]." Pursuant to that paragraph, the CPD had thirty days to respond in writing to this recommendation but did not do so.

While district captains review simple or standalone FPIs, TRED continues to review FPIs wit accompanying foot pursuits and/or TRRs.

the pilot program. Additionally, the Superintendent indicated his intent to detail additional officers to TRED, as well as expand the pilot department-wide.

As set out above, the CPD previously lost Secondary compliance with this paragraph when TRED suffered staff shortages amid a growing backlog of reviews. The CPD once again achieved and maintained Secondary compliance with this paragraph because CPD initiated the pilot program and anticipates that all district captains will be reviewing simple firearm pointing incidents by the end of the year. However, to maintain Secondary compliance and achieve additional levels of compliance, the CPD must continue to demonstrate that this path is scalable and permits the CPD to maintain sufficient resources consistent with this paragraph to achieve a 30-day review deadline. We look forward to the City and CPD's progress with the pilot and requirements of this paragraph.

Paragraph 193 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 - AUGUST 31, 2019 COMPLIANCE PROGRESS:

None

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD JULY 1, 2022 - DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary

TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary

FIFTH REPORTING PERIOD JULY 1, 2021 — DECEMBER 31, 2021 COMPLIANCE PROGRESS:

Secondary

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary

ELEVENTH REPORTING PERIOD JULY 1, 2024 - DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS:

Secondary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Preliminary

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

196. The City will ensure that all documentation and recordation of investigatory stop or arrest occurrences in which a CPD member points a firearm at a person, including OEMC data, is maintained in a manner that allows the Monitor, CPD, and OAG to review and analyze such occurrences. Beginning January 1, 2020, the Monitor will analyze these occurrences on an annual basis to assess whether changes to CPD policy, training, practice, or supervision are necessary, and to recommend any changes to the process of documenting, reviewing, and analyzing these occurrences. CPD will either adopt the Monitor's recommendations or respond in writing within 30 days. Any dispute regarding the whether the Monitor's recommendations should be implemented will be resolved by the Court.

Compliance Progress	(Reporting Period: January 1, 2025, through June 30, 2025				
Recurring Schedule:	Ongoing		Met	√	Missed
Preliminary:	In Compliance (SECOND REPORTING PERIOD)				
Secondary: Full:	In Compliance (THIRD REPORTING PERIOD) In Compliance (NEW)				

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶196.

To assess Preliminary compliance, the IMT reviewed the CPD's use-of-force policies—particularly Special Order S03-22, *Firearm Pointing Incidents*, effective April 15, 2025¹⁷—to ensure they address the requirements specified in ¶196.

To assess Secondary compliance, we reviewed the CPD's training on its firearm pointing incident policy and procedures for TRED and determined that a sufficient number of officers had completed the training.

To assess Full compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training, including following practices for maintaining and reviewing documentation, recordation, and data regarding firearm pointing incidents. We also evaluated whether the CPD produces data that allows the IMT to identify patterns and trends at the district, shift, and beat level in a timely fashion for all current pointing incidents (including those not associated with an investigatory stop report (ISR) or arrest report) and how the CPD responds to recommendations regarding trends and patterns.

Throughout the reporting periods to date, the IMT has made recommendations about the CPD's use-of-force policies and practices consistent with the requirements of ¶196, and the City and the CPD have addressed those recommendations

This reporting period, *Firearm Pointing Incidents* transitioned from Department Notice D19-01 (effective November 11, 2019) to Special Order S03-22 (effective April 15, 2025).

appropriately. For example, in the fourth reporting period, we noted our longstanding recommendation for the CPD to review all firearm pointing incidents, including those that did not have an associated ISR or arrest report. During the fifth reporting period, TRED began reviewing all firearm pointing incident reports (FPIRs), including FPIRs that did not have an ISR or arrest report associated with the incident.

We noted during the fifth reporting period, however, that TRED required additional personnel to meet its 30-day deadline for firearm pointing incident reviews. We also noted that we looked forward to the CPD's plan to introduce a Supervisory Dashboard to enable and encourage field supervisors to take on a greater responsibility for identifying issues and training opportunities, and taking corrective action, at the time that a firearm pointing incident occurs. During the fifth reporting period, TRED started to report how often supervisors indicated that they recognized a training opportunity and took corrective action at the time an incident occurs. Furthermore, TRED added a debriefing point to the TRR-R for supervisors who did not address a body-worn camera deficiency at the time of occurrence in the seventh reporting period.¹⁸

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's 2021 Year-End Report, "the information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need." To that end, the IMT anticipated the expansion of the dashboard to include firearm pointing incidents. And in the ninth reporting period, the IDR Supervisory Dashboard was created to encompass TRRs, foot pursuits, and firearm pointing incidents. Additionally, this reporting period, the CPD provided records to demonstrate that as of April 9, 2025, more than 95% of supervisors received training on the IDR Supervisory Dashboard.

Furthermore, the IMT made recommendations in the eighth monitoring report and comprehensive assessment that front-line supervisors need to be more involved and be responsible for viewing body-worn camera footage of all FPIs before the end of their tour of duty and take necessary supervisory action when required. We also noted that the CPD should monitor instances of firearm pointing and provide necessary support and training where warranted. In addition, the IMT recommended that TRED delegate the responsibility of reviewing firearm pointings to the districts to partly address the lack of resources. In the eleventh reporting period, the CPD created a district-level firearm pointing review pilot program in five

TRED's 2022 Year-End Report, CHICAGO POLICE DEPARTMENT (June 21, 2023) at 24, https://www.chicagopolice.org/wp-content/uploads/legacy/2022-YEAR-END-REPORT-21-JUNE-23.pdf.

¹⁹ TRED's 2021 Year-End Report, CHICAGO POLICE DEPARTMENT (April 29, 2022) at 95, https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

districts. This reporting period, the CPD has continued the pilot and has trained eight additional district captains in June 2025 to expand the pilot program.

While the City and the CPD have not met the 30-day response timeline per the requirements of ¶196, they have demonstrated a responsiveness and willingness to engage in negotiations with the IMT and the OAG to adopt policies, training, and dashboards that allow the Department to better identify patterns and trends. For example, in response to the IMT's suggestion that the CPD move responsibility for the review of firearm pointing incidents (FPIs) from TRED to the district captains, the CPD created and implemented a firearm pointing pilot program. This reporting period, the IMT reviewed monthly data on the progress of the pilot program and its impact on the review of firearm pointings. As another example, the IMT recently recommended to the City and the CPD that TRED add more debriefing points related to firearm pointings. The IMT appreciates the CPD's consideration of the IMT's recommendations and looks forward to further collaboration pursuant to this paragraph.

Thus, the City and CPD have achieved Full compliance this reporting period. For sustainment, the CPD must continue to implement the IMT's recommendations on firearm pointing incidents and provide written responses when disagreements arise.

Paragraph 196 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary

SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary

TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary

FIFTH REPORTING PERIOD JULY 1, 2021 - DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary

ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS: Secondary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: Full

207. CPD officers may use OC devices only when such force is objectively reasonable, necessary, and proportional under the totality of the circumstances, and consistent with the objectives above.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FOURTH REPORTING PERIOD)
Secondary: In Compliance (EIGHTH REPORTING PERIOD)

Full: In Compliance (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶207.

To evaluate Preliminary compliance with ¶207, we reviewed revised CPD policy G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*, which became effective on June 28, 2023. The revised policy incorporated the requirements of ¶207.

To evaluate Secondary compliance, the IMT reviewed the CPD's use of force training curricula and training attendance records to determine whether the CPD has sufficiently trained its officers on OC devices.

To assess Full compliance with ¶207, we reviewed CPD's use of force dashboards, TRRs, TRED mid-year and year-end reports, COPA data, and body-worn camera footage of incidents involving OC use.

As in previous reporting periods, we continue to review TRED's mid-year and year end reports. TRED's 2024 Year-End Report indicates that in 2024 CPD officers deployed OC Spray 32 times across 15 incidents, of which there were four SWAT-related incidents accounting for 21 (66%) of the 32 TRRs.²⁰ Additionally, there were eight debriefing points for OC deployment issued for the year. Additionally, in TRED's 2023 Year-End Report, 23 incidents contained OC discharges, seven of which were SWAT-related.²¹ In one incident, the investigating lieutenant deemed the multiple applications of OC use to violate policy, and a complaint log number was obtained. In contrast, in 2022, there were 25 incidents of OC deployment, and

²⁰ TRED's 2024 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2025) at 59, https://www.chicagopolice.org/wp-content/uploads/2024-YEAR-END.pdf.

TRED's 2023 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2024) at 60, https://www.chicagopolice.org/wp-content/uploads/Tactical-Review-and-Evaluation-Division-Year-End-Report-2023.pdf.

nearly 50% of these instances resulted in training recommendations.²² An additional four incidents were determined to be out of policy by the investigating lieutenant.

In summary, over the last 3 years (2022-2024), the CPD has reported using OC Spray 80 times, with SWAT officers discharging OC in 28 of these instances. Additionally, there were a total of 22 debriefing points issued for training, and 5 incidents that were determined to be not in policy.

COPA reports no allegations of "OC Discharge Injury or Death" between 2023 and 2024 and in the first quarter of 2025, and two allegations in 2022.²³ A review of six COPA cases involving OC Spray since the inception of the Consent Decree shows that five officers had allegations sustained in three cases. In two of those cases, the CPD officers were exonerated. In the remaining case, OC was utilized but COPA determined that there was no allegation of wrongdoing. The IMT has also reviewed COPA's case portal and notes that there are no pending OC discharge cases, with the last case dated February 18, 2022.

The IMT has also reviewed the TRED reports indicating the number of times OC Spray has been deployed over the last three years that include SWAT use. Over the three years, the average use of OC spray is approximately about 17 times a year for patrol officers. In reviewing the number of debriefings by TRED, district supervisors, compliance findings by Watch Operations Lieutenants, and available COPA allegations and findings, we have found that there are times when OC Spray was used out of policy, but those cases have been identified and addressed by the CPD and COPA. The oversight process is in place to identify instances where OC deployment is not objectively reasonable, necessary and proportional, it is identified and addressed appropriately.

Finally, the IMT also compared the data on the CPD's use of OC spray with data on the use of OC spray by other police departments in similarly sized cities and determined the number of instances of OC spray use was comparable in these cities. Below is a table showing the number of OC spray deployments per year for the New York City Police Department (NYPD) and the Los Angeles Police Department (LAPD). While the CPD deployed OC spray moderately more than the LAPD, the CPD deployed OC spray significantly less than the NYPD.

TRED's 2022 Year-End Report, CHICAGO POLICE DEPARTMENT (June 21, 2023) at 60, https://www.chicagopolice.org/wp-content/uploads/legacy/2022-YEAR-END-REPORT-21-JUNE-23.pdf.

²³ COPA's 2022 Annual Report, Civilian Office of Police Accountability (February 15, 2023) at 23, https://www.chicagocopa.org/wp-content/uploads/2023/04/2022-Annual-Report__.pdf.

Year	New York ²⁴	Los Angeles ²⁵
2020	153	15
2021	107	19
2022	141	8
2023	178	14
2024	150	
Up to June 30, 2025	55	

In conclusion, the City and CPD achieved Full compliance with the requirements of ¶207. The IMT will continue to monitor data regarding OC Spray use in the next reporting period.

Paragraph 207 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS:

Preliminary

Secondary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:

None

FIFTH REPORTING PERIOD JULY 1, 2021 — DECEMBER 31, 2021 COMPLIANCE PROGRESS:

Preliminary

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS:

Secondary

JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROCESSO JULY 1, 2024 - DECEMBER 31, 2024 Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Preliminary

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS:

Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 - JUNE 30, 2025 COMPLIANCE PROGRESS: Full

NYPD Force Dashboard, New York City Police Department, https://app.powerbigov.us/view?r=eyJrIjoiOGNhMjVhYTctMjk3Ny00MTZjLTliNDAtY2M2ZTQ5YWI3N2ViliwidCl6IjJiOWY1N2ViLTc4ZDEtNDZmYi1iZTgzL-WEyYWZkZDdjNjA0MyJ9 (last visited Sept. 17, 2025); NYC Open Data, City of New York, https://data.cityofnewyork.us/Public-Safety/NYPD-Use-of-Force-Incidents/f4tj-796d/data preview (last visited Sept. 17, 2025).

²⁵ 2023 Use of Force Year-End Review, Los Angeles Police Department, available at https://www.lapdpolicecom.lacity.org/042324/BPC 24-074.pdf (last visited Sept. 17, 2025).

213. CPD officers must not use impact weapons (e.g., baton, asp, improvised impact weapons) to intentionally strike a subject in the head or neck, except when deadly force is justified.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FOURTH REPORTING PERIOD)
Secondary: In Compliance (NINTH REPORTING PERIOD)

Full: In Compliance (NEW)

In the twelfth reporting period, the CPD achieved Full compliance with the requirements of ¶213.

To assess Preliminary and Secondary compliance, the IMT reviewed the applicable policy, the CPD's Use of Force Dashboard, TRED's mid-year and year-end reports, and the CPD's training. For example, the updated G03-02-07, *Baton Use Incidents* policy went into effect on June 28, 2023, and Section II.E.1 clearly states the requirements of this paragraph: "Head and Neck Strikes. Members will not use batons to intentionally strike a person in the head or neck except when deadly force is justified." Additionally, the CPD's Use of Force in-service training continues to cover ¶213's requirements, and the CPD has continued to train its officers annually on use of force.

To assess Full compliance with ¶213, the IMT reviewed CPD's Use of Force Dashboards, TRRs, TRED mid-year and year-end reports, BIA and COPA data, and bodyworn camera footage involving impact weapons.

For example, the IMT has reviewed TRED's 2024 year-end report and CPD's annual use of force data between 2021 to 2024. Based on that review, we have identified three potential instances of impact weapon strikes to the head. Specifically, the CPD's annual use of force reports should indicate there were two impact weapon

strikes to the head in 2024, ²⁶ one baton strike in 2023, ²⁷ and zero reported in 2022. ²⁸

Additionally, the IMT and the Chicago Office of Inspector General noted in reports on the 2020 protests that baton strikes increased significantly and were an area of concern.²⁹ The CPD has since trained on baton use in preparations for the Democratic National Convention (DNC), and as a result, no baton strikes were reported during the event.

The IMT has concluded that CPD supervisors and TRED personnel scrutinize baton use for intentional strikes to the head and report it accordingly, at which point it is further reviewed by the Force Review Board. The IMT has examined COPA reports and has queried COPA's public records database for reports relating to impact weapon strikes to the head with zero results. Accordingly, the IMT finds that impact weapon use generally is low, as indicated by TRED's 2024 Year-End Report that notes out of 37 TRRs indicating baton use, batons were used on a person in 10 instances.³⁰ The IMT finds that CPD members are aware of the prohibition on impact weapon head strikes. When it occurs and is reported, it is dealt with appropriately.

Thus, the City and CPD achieved Full compliance with the requirements of ¶213. We look forward to continuing to assess CPD's adherence to the requirements of this paragraph and CPD policy, including review of relevant data sources and reporting (e.g., BIA, COPA, or the City's Law Department).

See Chicago Police Department 2024 Annual Use of Force Report, CHICAGO POLICE DEPARTMENT (JUNE 30, 2025), at 118, https://www.chicagopolice.org/wp-content/uploads/UseOfForce_finalforpublication30July25b.pdf. The Use of Force Report states that there were 6 Tactical Response Reports (TRRs) indicating officers' use of an impact weapon to the heat. The IMT had further discussions with the CPD about this statistic and it was determined that the 6 TRRs related to a total of two incidents of impact strikes to the head.

See Chicago Police Department 2023 Annual Use of Force Report, CHICAGO POLICE DEPARTMENT (JUNE 27, 2024), at 114, https://www.chicagopolice.org/wp-content/uploads/2023-Annual-Use-of-Force-Report.pdf.

See Chicago Police Department 2022 Annual Use of Force Report, CHICAGO POLICE DEPARTMENT (APRIL 18, 2023), at 112, https://home.chicagopolice.org/wp-content/uploads/2022-Annual-Use-of-Force-Report-For-Publication.pdf.

See IMT Special Report Regarding the City of Chicago's Independent Monitoring Team (July 20, 2021), https://cpdmonitoringteam.com/wp-content/uploads/2024/03/2021_07_20-Independent-Monitoring-Team-Special-Report-filed.pdf;

TRED's 2024 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2025) at 63, https://www.chicagopolice.org/wp-content/uploads/2024-YEAR-END.pdf.

Paragraph 213 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Secondary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:

Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Secondary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Under Assessment

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

217. To be effective, the foundation of CPD's accountability system must be CPD members. When CPD members use force, they must be able to demonstrate that the force used complies with the law and CPD policy. When a member's use of force does not comply with the law and CPD policy, the member's supervisors must be able to identify the non-compliance and take appropriate action to address it. To facilitate evaluation of how CPD members use force, CPD will ensure that members report incidents when they use force and that supervisors collect and review available information about the incidents.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (SIXTH REPORTING PERIOD)

Secondary: In Compliance (NEW)
Full: Not Yet Assessed

In the twelfth reporting period, the CPD achieved Secondary compliance with the requirements of ¶217.

To evaluate Preliminary compliance with ¶217, the IMT reviewed the CPD's Use of Force policies to ensure they address the requirements specified in ¶217. We also evaluated the CPD's efforts to obtain and address community engagement and input on the policies that address ¶217's requirements.

To assess Secondary compliance, the IMT reviewed relevant training courses and attendance records, including the CPD's 2025 In-Service Supervisor Training. The IMT also reviewed the CPD's implementation and continued use of the IDR Supervisory Debriefing Point Dashboard, which gives CPD supervisors access to officers' IDR debriefing history and assists supervisors in identifying compliance issues requiring attention including discipline or additional training.

To evaluate Full compliance with ¶217, we will assess whether the CPD has put the requirements of this paragraph into practice. For example, the IMT will review data that demonstrates not only that uses of force are being reported by frontline officers, but that those reports are being reviewed by supervisors at the district-level, at TRED, and/or at COPA when appropriate. The IMT will also consider the progress that the CPD makes toward clearing the backlog of IDRs awaiting review at TRED as part of its assessment of Full compliance with this paragraph.

In conclusion, the City and CPD achieved Secondary compliance with the requirements of this paragraph. Moving forward, the IMT will continue to review data associated with CPD's frontline reporting and review by supervisors, TRED and COPA.

Paragraph 217 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Not Applicable

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Preliminary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 — DECEMBER 31, 2021
COMPLIANCE PROGRESS:

Not Applicable

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Not Applicable

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS:
Preliminary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS:

Secondary

231. The reviewing supervisor will conduct an investigation into the reportable use of force incident by reviewing all information reasonably available regarding the incident, including written reports, video or audio recordings, and, in the case of level 2 and level 3 reportable use of force incidents, witness statements, photographs (if available), and other evidence or information collected by the responding supervisor. After advising the subject of his or her right not to answer questions and other applicable rights, and only if the subject voluntarily consents to an interview, the reviewing supervisor will interview the subject solely about the reportable use of force. In addition, the reviewing supervisor will visually inspect the subject and document any injuries observed.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary: In Compliance (FIRST REPORTING PERIOD)
Secondary: In Compliance (SEVENTH REPORTING PERIOD)

Full: In Compliance (NEW)

In the twelfth reporting period, the CPD achieved Full compliance with the requirements of ¶231.

To evaluate Preliminary compliance with ¶231, the IMT reviewed the CPD's Use of Force policies. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies. The CPD achieved Preliminary compliance with ¶231 with revisions to G03-02-02 *Incidents Requiring the Completion of a Tactical Response Report*, effective June 28, 2023, and continued community engagement.

To assess Secondary compliance, the IMT reviewed relevant training courses and attendance records. This reporting period, the IMT reviewed the CPD's 2025 In-Service Supervisor Training.

To evaluate Full compliance with ¶231, we reviewed TRED mid-year and year-end reports, annual use of force reports, as well as BIA and COPA reports that identified instances in which reviewing supervisors fulfill their responsibilities as required under this paragraph. We also reviewed BIA and COPA data regarding instances where a supervisor did not adhere to the requirements of this paragraph.

The IMT continued to review TRED mid-year and year-end reports this reporting period. For the last 2.5 years, TRED report data on reviewing supervisory responsibilities have focused on Miranda rights, subjects' willingness to be interviewed regarding an officer's use of force and reviewing supervisors examining subjects

for injuries. In 2022, there were 31 debriefings on injuries not being documented,³¹ and there were nine debriefings in which Miranda rights were not documented.³² In 2023, there were no reports of either deficiency.³³ Additionally, in 2024, there were four debriefing points for the reviewing supervisor failing to document injuries.³⁴ Similarly, there was one debriefing point for an undocumented visual inspection of the subject, and two debriefing points for undocumented Miranda rights.³⁵ Overall, it appears the deficiencies in these areas are decreasing over time.

Furthermore, the CPD's TRR requires reviewing supervisors to address all the above-mentioned issues in every TRR. The CPD's 2022 Annual Use of Force Report notes that 37% of persons subjected to a use of force were injured or reported substantial pain.³⁶ In the same year, 43% of individuals subjected to force were taken to a hospital for treatment or medical clearance.³⁷ In 2023, there was a reduction of individuals being injured due to a use of force (33%),³⁸ and being taken to a hospital (40%).³⁹

Additionally, in interviews with CPD officers and supervisors, interviewees noted that there is an expectation for injured subjects and arrestees to be taken to a hospital. In this reporting period, the IMT also reviewed the IDR Supervisory Dashboard to determine the actions taken when supervisors receive recommendations. CPD also documented the actions taken when Lieutenants receive advisements/recommendations. This data indicates that investigating supervisors are largely addressing the requirements of ¶231, which supports the CPD achieving Full compliance.

TRED's 2022 Year-End Report, CHICAGO POLICE DEPARTMENT (June 21, 2023) at 57, https://www.chicagopolice.org/wp-content/uploads/legacy/2022-YEAR-END-REPORT-21-JUNE-23.pdf.

³² *Id.* At 59.

TRED's 2023 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2024) at 57, 59, https://www.chicagopolice.org/wp-content/uploads/Tactical-Review-and-Evaluation-Division-Year-End-Report-2023.pdf.

TRED's 2024 Year-End Report, CHICAGO POLICE DEPARTMENT (June 27, 2025) at 56, https://www.chicagopolice.org/wp-content/uploads/2024-YEAR-END.pdf.

³⁵ *Id.* At 58.

See Chicago Police Department 2022 Annual Use of Force Report, CHICAGO POLICE DEPARTMENT (APRIL 18, 2023), at 80, https://home.chicagopolice.org/wp-content/uploads/2022-Annual-Use-of-Force-Report-For-Publication.pdf.

³⁷ *Id.* At 81.

See Chicago Police Department 2023 Annual Use of Force Report, CHICAGO POLICE DEPARTMENT (JUNE 27, 2024), at 81, https://www.chicagopolice.org/wp-content/uploads/2023-Annual-Use-of-Force-Report.pdf.

³⁹ *Id.* At 82.

In conclusion, the City and CPD achieved Full compliance with the requirements of this paragraph. Moving forward, the IMT will continue to review data associated with reviewing supervisors' responsibilities.

Paragraph 231 Compliance Progress History

FIRST REPORTING PERIOD

MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 — DECEMBER 31, 2022
COMPLIANCE PROGRESS:
Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Secondary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 — JUNE 30, 2023
COMPLIANCE PROGRESS:
Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Secondary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS:
Full