

Independent Monitoring Report 12

Accountability and Transparency

Compliance Assessments by Paragraph

Specific assessments, by paragraph, for the Accountability and Transparency 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 Accountability and Transparency section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.

Accountability and Transparency: ¶431

431. *The City and CPD will undertake best efforts to ensure that the absence of a signed complainant affidavit alone will not preclude an administrative investigation.*

Compliance Progress

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)

CPD *In Compliance* (FOURTH REPORTING PERIOD)

COPA *In Compliance* (FOURTH REPORTING PERIOD)

Secondary: *In Compliance* (NINTH REPORTING PERIOD)

CPD *In Compliance* (NINTH REPORTING PERIOD)

COPA *In Compliance* (FIFTH REPORTING PERIOD)

Full: *In Compliance* (NEW)

CPD *In Compliance* (NEW)

COPA *In Compliance* (SEVENTH REPORTING PERIOD)

In the twelfth reporting period, the City and the CPD achieved Full compliance, and COPA maintained Full compliance with ¶431.

Before the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.1.1, *Intake*. COPA achieved Secondary compliance by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures* training. Additionally, COPA achieved Full compliance by providing a memorandum with documentation that provided specific information regarding the affidavit override and override request.

To maintain Full compliance, COPA provided documentation of anonymous complaints at various stages of investigation, which demonstrate that a lack of a signed complainant affidavit does not preclude an administrative investigation.

Before the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing G08-01, *Complaint and Disciplinary System*, which sufficiently addresses the affidavit override process and exceptions to the affidavit requirement. The CPD achieved Secondary compliance by finalizing and delivering its *BIA Onboard Training: Complaint Initiation and Affidavit Overrides*. To maintain Secondary compliance, the CPD provided drafts of its *BIA Onboard Training: Department Member Interviews* and *BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides Module* for review, and the IMT and the OAG provided no-objection notices.

To assess Full compliance, the IMT reviewed examples of affidavit overrides, which demonstrated that the CPD undertakes best efforts to ensure that the absence of a signed complainant affidavit alone will not preclude an administrative investigation.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance and for them to review and revise, if necessary, their G08-01, *Complaint and Disciplinary System*, policy. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 431 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶446

446. *In the course of investigating a complaint, the City, CPD, and COPA will ensure: a. within five business days of receipt of a non-confidential complaint COPA or BIA will send non-anonymous complainants or their representatives a written notice of receipt. The notice will include the unique tracking number assigned to the complaint. The notice will advise the complainant or his or her representative whether BIA or COPA will be investigating the complaint, and how the complainant or his or her representative may inquire about the status of the investigation. The notice will not contain any language discouraging participation in the investigation. B. within 60 days of the final disciplinary decision the complainant will be provided a copy of the Administrative Summary Report.*

Compliance Progress

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

Preliminary:	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:	<i>Under Assessment</i>
CPD	<i>Under Assessment</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>

In the twelfth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance, and COPA maintained Full compliance with ¶446. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

Before the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.2.2, *Timeliness Benchmarks*. COPA achieved Secondary compliance by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures: In-Service 2021* training. Additionally, COPA achieved Full compliance by providing various forms of documentation and information. First, COPA provided guidance for review on the publishing and distribution of Final Summary Reports. COPA also provided guidance on contacts with non-department member witnesses and complainants and confirmation of representation. Lastly, COPA provided a memorandum with examples of three COPA investigations portraying the process from the complaint intake through the Final/Administrative Summary reports.

To maintain Full compliance, COPA provided documentation that notices of receipt are sent to complainants within five days as required by this paragraph. To maintain Preliminary compliance, the CPD provided a revised draft of its S08-01-08,

Post Investigation Log Number Procedures, which has new clarifying language regarding the increase to “forty-five” days for the requirement of BIA forwarding Administrative Summary Reports to appropriate individuals. The IMT provided a no-objection notice.

To assess Full compliance, the CPD provided a spreadsheet that identified a random sample of investigation cases conducted by BIA and Accountability Sergeants. The spreadsheet provides the dates the complaint was received and assigned and the dates the notification of receipt and Administrative Summary Report were sent to the complainants. While the sample of cases meets the requirements of ¶446, the IMT is concerned that it does not accurately reflect the CPD’s daily practices because the CPD’s *Audit of 2024 Investigation Timeframe Requirements*, which sampled 1,407 log numbers, found that only 11% of cases had an Administrative Summary Report published within 60 days. Therefore, the City and the CPD remain under assessment for Full compliance with ¶446 until the CPD completes the necessary corrective and remedial measures to address the deficiencies identified in the audit.

Moving forward, for the CPD, we will look for evidence that the CPD is implementing processes in accordance with ¶446 and is working to address the deficiencies identified in the audit, and for them to continue to review and revise, if necessary, their S08-01-08, *Post Investigation Log Number Procedures*, policy. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule to maintain Full compliance.

Paragraph 446 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶447

447. *The City and CPD will require that all COPA and BIA personnel and Accountability Sergeants communicate with complainants and involved CPD members in a professional and respectful manner.*

Compliance Progress

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

Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (NINTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (NINTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:		<i>Under Assessment</i>
	CPD	<i>Under Assessment</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>

In the twelfth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance, and COPA maintained Full compliance with ¶447. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

Prior to the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.1.1, *Intake*. COPA achieved Secondary compliance by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures: In-Service 2021* training. Additionally, COPA achieved Full compliance by providing transcripts of interviews of complainants and officers demonstrating that COPA personnel communicate in a professional and respectful manner.

To maintain Full compliance, COPA provided interview transcripts and other investigation documents to demonstrate that COPA investigators communicate with CPD members and complainants in a professional and respectful manner. However, the IMT notes that COPA is also required to review, and revise, if necessary, their Policy 3.1.1, *Intake*, to demonstrate continued compliance with this paragraph.

Prior to the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing S08-01, *Complaint and Disciplinary Investigators and Investigations*. The CPD achieved Secondary compliance by finalizing and delivering its *BIA Onboard Training Module 7: Procedural Justice, Implicit Bias, and Conflicts of Interest*. To maintain Secondary compliance, the CPD provided drafts of its *BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest* and *BIA Onboard Training: Evidence Collection and Non-Department Interviews* for review. The IMT and the OAG provided no-objection notices.

To assess Full compliance, the IMT reviewed a random sample of audio recordings involving complainants and participants from 2024 log number investigations undertaken by the BIA General and Special Investigations Unit. These recordings demonstrated BIA investigators' communication with members and complainants in a professional and respectful manner. However, the sample audio recordings provided did not include examples of audio recording of investigations by Accountability Sergeants. Paragraph 447 places this requirement on both BIA personnel and Accountability Sergeants.

Moving forward, for the CPD, we expect to receive evidence of Accountability Sergeants' communications with members and complainants to achieve Full compliance. To maintain Full compliance, we expect to receive evidence of continued compliance each reporting period and for them to periodically review and revise, if necessary, their S08-01, *Complaint and Disciplinary Investigators and Investigations*, policy. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 446 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶450

450. CPD will develop and implement policies to ensure that a CPD member who is alleged to be involved in misconduct (the “involved member”) receives notice that he or she is under administrative investigation. The policies will provide, at a minimum: a. CPD members under investigation will not receive such notice of confidential investigations, but will receive notice prior to being formally interviewed by COPA, BIA, or an Accountability Sergeant; b. such notice will comport with due process and the law, and will describe the nature of the complaint made against the involved member, and the involved member’s rights, but will not contain any information that is part of a confidential investigation; and c. once a CPD member has been notified or otherwise becomes aware that he or she is the subject of an administrative investigation, the CPD member will not review the following documents and evidence related to an incident under administrative investigation, until notified by BIA that he or she is permitted to do so, or as may be required to testify as a witness in criminal or civil proceedings: i. any investigative files; ii. any reports (except for reports about the incident authored by the CPD member); or iii. any other evidence, from any source, including body and dashboard camera footage (except as permitted for purposes of completing incident reports or other documentation).

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶450.

Prior to the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing S08-01-01, *Conducting Log Number Investigations*. The CPD achieved Secondary compliance by finalizing and delivering its Module 5 training, *Consent Decree and Law Review*. To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training Department Member Interviews*, for review, and the IMT and the OAG provided no-objection notices.

To assess Full compliance, the IMT reviewed the CPD’s documentation of confidential case examples. The documentation included notices of allegations for both confidential and non-confidential allegations to the involved CPD member, a spreadsheet that identifies confidential log number investigations initiated during the period, and case management system (CMS) screenshots. The documentation demonstrates that information regarding confidential investigations is not accessible via a CMS search and preserves the confidential nature of such investigations.

Moving forward, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise, if necessary, their

S08-01-05, *Conducting Log Number Investigations*, policy to maintain Full compliance. For sustained compliance, the CPD must consistently demonstrate that these notification requirements are being met.

Paragraph 450 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶451

451. A CPD member who reviews audio or video evidence for purposes of completing an incident report will document in writing that he or she reviewed the evidence in each relevant incident report.

Compliance Progress

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

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

In the twelfth reporting period, the City and the CPD achieved Preliminary compliance with ¶451.

To assess Preliminary compliance, the IMT reviewed the CPD'S G04-01, *Preliminary Investigations*. The IMT and the OAG provided no-objection notices. The policy requires CPD officers who review audio or video recordings for the purpose of completing an incident report to document this fact in the narrative section of each relevant incident report. In addition, the policy also includes content that appropriately directs officers to communicate with people in a professional and respectful manner and informs officers of the requirements regarding notifying the Office of Emergency Management and Communications when transporting victims, witnesses, and community members. The IMT notes, however, that Section VI of the policy does not address the body-worn-camera matters that are pending before the Court.

Moving forward, we will look for the City and the CPD to develop and provide training covering the requirements of this paragraph.

Paragraph 451 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: None	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶452

452. *Consistent with the applicable collective bargaining agreements, CPD will require members to cooperate with administrative investigations, including appearing for an administrative interview when requested by COPA, BIA, or an Accountability Sergeant and will provide all requested documents and evidence under the CPD member's custody and control.*

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶452.

Prior to the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing G08-01, *Complaint and Disciplinary System*. The CPD achieved Secondary compliance by finalizing and delivering its *BIA eLearning* that addresses the requirements of ¶452. To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training: Department Member Interviews* for review, and the IMT and the OAG provided no-objection notices.

To assess Full compliance, the IMT reviewed a random sample of notification of charges and scheduling data, which demonstrates CPD members' cooperation with administrative investigations by appearing for administrative interviews as requested. In future reporting periods, the IMT expects the CPD to provide additional documentation demonstrating that CPD members also provide all requested documents or evidence under their control when applicable.

Moving forward, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise, if necessary, their G08-01, *Complaint and Disciplinary System*, policy to maintain Full compliance.

Paragraph 452 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶459

459. Within 30 days of receiving an allegation: a. COPA and BIA will assess the allegation to determine whether the complainant has alleged potential misconduct; and b. if potential misconduct is alleged, COPA, BIA, or the district will initiate a preliminary investigation into the complaint.

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

Preliminary:		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the twelfth reporting period, the City and the CPD achieved Secondary compliance, and COPA maintained Full compliance with ¶459. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

To maintain Preliminary compliance, the CPD provided a revised draft of its S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, which added clarified language on the “seven-day” review requirement for an assigned BIA investigator to conduct a “conflict of interest” review, as well as incorporated inclusive language to address persons with limited English proficiency and disabilities. The IMT provided a no-objection notice.

To assess Secondary compliance, the IMT reviewed the CPD’s *BIA Intake Training* records, which demonstrated that on-the-job case management system (CMS) training was provided to BIA intake division personnel. The training addressed the requirements of this paragraph and covered the CPD’s S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*.

Moving forward, for the CPD, we expect to receive evidence that the BIA is responding to received allegations in accordance with ¶459’s mandates and for them to continue to periodically review and revise, if necessary, their S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, policy. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule to maintain Full compliance.

Paragraph 459 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
None

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Preliminary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
Secondary

Accountability and Transparency: ¶461

461. *Allegations of misconduct based on verbal abuse will be preliminarily investigated to determine whether it is appropriate to continue the investigation. Anonymously submitted misconduct allegations will be preliminarily investigated to determine whether it is appropriate to continue the investigation, in accordance with the applicable collective bargaining agreements in effect at the time of the allegation is made.*

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

Preliminary:		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)

In the twelfth reporting period the City and the CPD achieved Secondary compliance, and COPA maintained Full compliance with ¶461. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

To maintain Full compliance, COPA provided a list of all verbal abuse complaints and all anonymously submitted complaints as well as spreadsheets, screenshots, and other documentation that demonstrates that COPA performed investigations into both of these types of complaints.

To maintain Preliminary compliance, the CPD provided a revised draft of its S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, for review, and the IMT provided a no-objection notice.

To assess Secondary compliance, the IMT reviewed the CPD's *BIA Intake Training* records, which demonstrated that on-the-job CMS training was provided to BIA intake division personnel. The training addressed the requirements of this paragraph and covered the CPD's S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*.

Moving forward, for the CPD, we expect to receive evidence that the BIA is responding to misconduct allegations in accordance with ¶461's mandates, and for them to continue to periodically review and revise, if necessary, their S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, policy. For COPA,

we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule to maintain Full compliance.

Paragraph 461 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶462

462. A signed complainant affidavit will not be required to conduct a preliminary investigation.

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Full:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)

In the twelfth reporting period, the City and the CPD achieved Full compliance, and COPA maintained Full compliance with ¶462.

Prior to the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.1.1, *Intake*. COPA achieved Secondary compliance by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures: In-Service 2021* training. Additionally, COPA achieved Full compliance by providing documentation showing that COPA made 144 Affidavit Overrides Requests from September 2017 through March 2023. The documentation demonstrated that COPA consistently requests Affidavit Overrides from BIA for cases in which it is unable to contact victims, complainants, or witnesses. Additionally, COPA provided letters or memorandums to BIA that articulated the reasons for requesting the Affidavit Override, which all appeared to be based on reasonable reasons.

To maintain Full compliance, COPA provided the logs of anonymous complaints at different stages of an investigation which demonstrate that an affidavit is not required for COPA to conduct a preliminary investigation.

Prior to the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing G08-01, *Complaint and Disciplinary System*. The CPD achieved Secondary compliance by finalizing and delivering the *BIA eLearning* that addresses the requirements of ¶462. To maintain Secondary compliance, the CPD provided a draft of its *BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides* for review, and the IMT and OAG provided no-objection notices.

To assess Full compliance, the IMT reviewed examples of affidavit overrides, which demonstrated that the CPD undertakes best efforts to ensure that the absence of a signed complainant affidavit alone will not preclude an administrative investigation.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for them to periodically review and revise, if necessary, their G08-01, *Complaint and Disciplinary System*, policy to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 462 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶467

467. For each allegation associated with a misconduct investigation, COPA, BIA, or the districts will explicitly identify and recommend one of the following findings: a. “Sustained,” where it is determined the allegation is supported by a preponderance of the evidence; b. “Not Sustained,” where it is determined there is insufficient evidence to prove the allegations by a preponderance of the evidence; c. “Unfounded,” where it is determined, by clear and convincing evidence, that an allegation is false or not factual; or d. “Exonerated,” where it is determined, by clear and convincing evidence, that the conduct described in the allegation occurred but is lawful and proper.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (ELEVENTH)
CPD	<i>In Compliance</i> (ELEVENTH)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the twelfth reporting period, the City and the CPD achieved Full compliance, and COPA maintained Full compliance with ¶467.

Before the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.1.3, *Final Summary Report*. COPA achieved Secondary compliance by finalizing and delivering its *Final Summary Reports and Standard of Proof* training. Additionally, COPA achieved Full compliance by providing randomized documentation demonstrating that it identifies and recommends findings of sustained, not sustained, unfounded, or exonerated in each of its Final Summary Reports.

To maintain Full compliance, COPA provided Final Summary Reports and Case Summary Reports for a sample of cases which explicitly identify a finding of sustained, not sustained, exonerated, or unfounded for each allegation served.

Before the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing G08-01, *Complaint and Disciplinary System*. The CPD achieved Secondary compliance by finalizing and delivering its *BIA Accountability Supplemental eLearning* and the *BIA Annual In Service Training Module 3: Credibility, Standards of Proof, and Disciplinary Decision Making*.

To assess Full compliance, the IMT reviewed a sample of log number investigations which demonstrated that a finding for each allegation was made. The sample included investigations where multiple findings were made based on the nature of

the allegation. In addition, the investigation closing reports demonstrated that the findings were consistent with evidence as defined in ¶467.¹

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for them to periodically review and revise, if necessary, their G08-01, *Complaint and Disciplinary System*, policy to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 467 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

¹ The 2024 BIA Annual Report was also produced for Full compliance review with ¶¶441, 443, 463, and 467. However, the reports alone are insufficient for Full compliance with those paragraphs. To achieve Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data.

Accountability and Transparency: ¶486

486. *The City, CPD, and COPA will ensure that CPD and COPA maintain thorough and complete administrative investigative files. Such administrative investigative files will include: a. documentation of all evidence that was gathered, including names, phone numbers, and addresses of witnesses to the alleged misconduct. In situations in which there are no known witnesses, the file will specifically state this fact. In situations in which witnesses were present but circumstances prevented the investigator from collecting information from those witnesses, the investigative file will state the reasons why. The investigative file also will include all available identifying information for anyone who refuses to provide a statement; b. documentation of each interview conducted and the recording of those interviews, if available; c. the names of all CPD members who have been identified as witnesses to the alleged misconduct; d. COPA's, BIA's, or the district's narrative description and evaluation of the alleged misconduct, based on its review of the evidence gathered, including a determination of whether the CPD member's actions appear to be within CPD policy, procedure, regulations, orders, or other standards of conduct required of CPD members; e. in cases where material inconsistencies exist between complainant, CPD member, and witness statements, explicit identification of the inconsistencies, including a description of the evidence reviewed and written credibility findings; f. if a CPD member deployed a weapon, documentation of whether the CPD member's certification and training for the weapon were current; g. all CPD member original statements, as well as any amendments or clarifications to the original statement, and any subsequent statements; and h. an explicit identification of each allegation and the recommended finding for each allegation of misconduct in an investigation.*

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SIXTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>Under Assessment</i>

In the twelfth reporting period, the City and the CPD maintained Secondary compliance, and COPA maintained Secondary compliance and is under assessment for Full compliance with ¶486.

To assess Full compliance, the IMT reviewed records from five COPA investigations that demonstrate that the requirements of ¶486 are being met, including Final Summary Reports, CMS screenshots, weapon certification records, evidence attachment lists, and notes reports. The IMT looks forward to engaging in a more in-

depth review of COPA's closed investigations to confirm investigative files are maintained in a manner consistent with this paragraph to achieve Full compliance.

This reporting period, the CPD provided links to webpages of the City of Chicago², the CPD^{3,4,5}, and COPA^{6,7} where information regarding the CMS, electronic or digital records storage, and access to filing a complaint or misconduct can be found. However, the public websites do not provide sufficient information for the IMT to assess whether the CPD administrative investigations meet the requirements of this paragraph.

Moving forward, for the CPD, we expect to receive documentation that the CPD administrative investigations meet the mandates of ¶486 and for them to periodically review and revise, if necessary, their S08-01-09, *Requirements of a Complete Log Number Investigative File*. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 486 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

² See City of Chicago Data Portal, https://data.cityofchicago.org/Public-Safety/COPA-Cases-Summary/mft5-nfa8/data_preview.

³ See CPD How to File a Complaint, <https://www.chicagopolice.org/filing-a-complaint/>.

⁴ See CPD File an Anonymous Complaint (OIG), <https://www.chicagopolice.org/file-an-anonymous-complaint-oig/>.

⁵ See CPD BIA Accountability Dashboard 2, <https://www.chicagopolice.org/statistics-data/data-dashboards/accountability-dashboard-2/>.

⁶ See COPA Case Portal, https://www.chicagocopa.org/data-cases/case-portal/?sort_order=title%20desc.

⁷ See COPA Jurisdiction Types of Cases, <https://www.chicagocopa.org/investigations/jurisdiction/>.

Accountability and Transparency: ¶492

492. *Criminal investigations into the actions of any CPD member relating to any “officer-involved death” will comply with the Police and Community Relations Improvement Act, 50 ILCS 727/1-1 et seq. (“PCRIA”). The City will use best efforts to ensure that a “law enforcement agency,” as that term is defined under PCRIA, will conduct such investigations. The “law enforcement agency” conducting criminal investigations into the actions of any CPD member relating to any “officer-involved death” will have substantial experience and expertise in criminal homicide investigations.*

Compliance Progress

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

Preliminary:	<i>In Compliance (NEW)</i>
Secondary:	<i>Not Yet Assessed</i>
Full:	<i>Not Yet Assessed</i>

In the twelfth reporting period, the City and the CPD achieved Preliminary compliance with ¶492.

To assess Preliminary compliance, the IMT reviewed documentation of the City’s and the CPD’s best efforts to ensure that a “law enforcement agency,” as that term is defined in the Police and Community Relations Act (PCRIA)⁸, will conduct investigations relating to any “officer-involved death.” The City production included documentation detailing the City’s and the CPD’s outreach efforts to various law enforcement agencies to date. The City has explored—and is continuing to explore—three potential solutions for complying with PCRIA: (1) having the Illinois State Police (ISP) conduct all investigations of CPD officer-involved deaths; (2) creating a regional task force to conduct all investigations of CPD officer-involved deaths; or (3) seeking an exemption for COPA, the CPD, and the City from PCRIA.

To date, the City and the Illinois State Police have been unable to reach an agreement. Therefore, in the twelfth reporting period, the City continued its efforts to either create a regional task force to conduct all investigations of CPD officer-involved deaths or to seek an exemption for COPA, the CPD, and the City from PCRIA. We look forward to additional updates next reporting period.

To maintain Preliminary compliance, both the City and the CPD must continue to demonstrate ongoing best efforts. For Secondary compliance, the City and the CPD must demonstrate that the “law enforcement agency” conducting criminal investigations into the actions of any CPD member relating to any “officer-involved death” will have substantial experience and expertise in criminal homicide investigations. Full compliance will require “[c]riminal investigations into the actions of any CPD member relating to any ‘officer-involved death’ will comply with [PCRIA].”

⁸ See Illinois General Assembly 50 ILC 727/1-1 et seq. (PCRIA).

Paragraph 492 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: None	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶499

499. When COPA, BIA, or the investigating district has arrived at the investigative findings and recommendations, it will promptly finalize a summary report (“Administrative Summary Report”). The Administrative Summary Report will include: a. a description of the CPD members and individuals involved in the alleged misconduct; b. the date, time, and location of the alleged misconduct; c. a description of the allegations and applicable policies; d. a narrative summary of the alleged misconduct; e. a narrative summary of the investigation; and f. the investigating body’s findings and conclusions for each allegation of misconduct, including any discipline recommended.

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the twelfth reporting period, the City and the CPD achieved Full compliance, and while COPA maintained Full compliance with ¶499.

Prior to the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.1.3, *Final Summary Report*. COPA achieved Secondary compliance by finalizing and delivering its *Final Summary Reports and Standard of Proof* training. Additionally, COPA achieved Full compliance by providing documentation demonstrating its compliance efforts, including a template for Final Summary Reports and completed reports.

To maintain Full compliance, COPA provided a sample of Final Summary Reports which include the alleged misconduct, summaries of the investigations, COPA’s findings, and the analysis used to reach those findings.

Before the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing S08-01-04, *Post Investigation Log Number Procedures*. The CPD achieved Secondary compliance by finalizing and delivering its *BIA Accountability Supplemental eLearning* and the *BIA Annual In-Service Training Module 10: Mistakes and Updates*.

To assess Full compliance for the CPD, the IMT reviewed links to webpages of the City of Chicago⁹, the CPD^{10,11,12}, and COPA^{13,14} where information regarding the CMS, electronic or digital records storage, and access to filing a complaint or misconduct can be found. The production also included links to completed Administrative Summary Reports (ASRs). The completed ASRs addressed the requirements of this paragraph.

Moving forward, to maintain Full compliance, the CPD should also provide independent documentation to confirm that the ASRs are completed “promptly,” as required by this paragraph. For the CPD, we expect to receive evidence of continued compliance with each reporting period, and for them to periodically review and revise, if necessary, their S08-01-04, *Post Investigation Log Number Procedures*. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 499 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

⁹ See City of Chicago Data Portal, https://data.cityofchicago.org/Public-Safety/COPA-Cases-Summary/mft5-nfa8/data_preview.

¹⁰ See CPD How to File a Complaint, <https://www.chicagopolice.org/filing-a-complaint/>.

¹¹ See CPD File an Anonymous Complaint (OIG), <https://www.chicagopolice.org/file-an-anonymous-complaint-oig/>.

¹² See CPD BIA Accountability Dashboard 2, <https://www.chicagopolice.org/statistics-data/data-dashboards/accountability-dashboard-2/>.

¹³ See COPA Case Portal, https://www.chicagocopa.org/data-cases/case-portal/?sort_order=title%20desc.

¹⁴ See COPA Jurisdiction Types of Cases, <https://www.chicagocopa.org/investigations/jurisdiction/>.

Accountability and Transparency: ¶502

502. Information contained in the Administrative Summary Report that is legally exempt from disclosure for privacy or other purposes will be redacted prior to electronic publication.

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Secondary:	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
		<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
Full:	CPD	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the twelfth reporting period, the City and the CPD achieved Full compliance, and COPA maintained Full compliance for ¶502.

Prior to the twelfth reporting period, COPA achieved Preliminary compliance by finalizing Policy 3.1.3, *Final Summary Report*. COPA achieved Secondary compliance by finalizing and delivering its *Final Summary Reports and Standard of Proof* training. Additionally, COPA achieved Full compliance by providing published Final Summary Reports containing appropriate redactions, as required by this paragraph.

To maintain Full compliance, COPA shared their Final Summary Reports, which are available on COPA's case portal¹⁵ and demonstrate that information is redacted for publication, as required by this paragraph.

Prior to the twelfth reporting period, the CPD achieved Preliminary compliance by finalizing S08-01-04, *Post Investigation Log Number Procedures*. The CPD achieved Secondary compliance by finalizing and delivering the *BIA eLearning* that addresses the requirements of ¶502.

¹⁵ See COPA Case Portal, https://www.chicagocopa.org/data-cases/case-portal/?sort_order=title%20desc.

To assess Full compliance for the CPD, the IMT reviewed links to webpages of the City of Chicago¹⁶, the CPD^{17,18,19}, and COPA^{20,21} where information regarding the case management system, electronic or digital records storage, and access to filing a complaint or misconduct can be found. The production also included links to completed Administrative Summary Reports (ASRs) and documentation identifying the type of information that is legally exempt from disclosure. The completed ASRs contained appropriate redactions, as required by this paragraph.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance, and for the CPD to periodically review and revise, if necessary, their S08-01-04, *Post Investigation Log Number Procedures*. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule.

Paragraph 502 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

¹⁶ See City of Chicago Data Portal, https://data.cityofchicago.org/Public-Safety/COPA-Cases-Summary/mft5-nfa8/data_preview.

¹⁷ See CPD How to File a Complaint, <https://www.chicagopolice.org/filing-a-complaint/>.

¹⁸ See CPD File an Anonymous Complaint (OIG), <https://www.chicagopolice.org/file-an-anonymous-complaint-oig/>.

¹⁹ See CPD BIA Accountability Dashboard 2, <https://www.chicagopolice.org/statistics-data/data-dashboards/accountability-dashboard-2/>.

²⁰ See COPA Case Portal, https://www.chicagocopa.org/data-cases/case-portal/?sort_order=title%20desc.

²¹ See COPA Jurisdiction Types of Cases, <https://www.chicagocopa.org/investigations/jurisdiction/>.

Accountability and Transparency: ¶504

504. As soon as feasible, but by no later than January 2020, upon arriving at the final disciplinary decision, CPD and COPA will ensure that the Administrative Summary Report is provided to the involved CPD member and the Department. CPD will ensure that the Administrative Summary Report is provided to the involved CPD member's District or Unit Commander and immediate supervisor.

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance</i> (NEW)

In the twelfth reporting period, COPA achieved Full compliance, and the City and the CPD maintained Secondary compliance with ¶504. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To maintain Preliminary compliance, the CPD provided a revised draft of its S08-01-08, *Post Investigation Log Number Procedures*, and the IMT provided a no-objection notice.

Before the twelfth reporting period, COPA achieved preliminary compliance by finalizing Policy 3.2.2, *Timeliness Benchmarks, Conclusion of Investigation*. COPA achieved Secondary compliance by finalizing its *Publishing and Distribution of Final Summary Reports* guidance.

To assess Full compliance for COPA, the IMT reviewed COPA's Final Summary Reports (FSRs). The production also included evidence that the FSRs were timely provided to the CPD and the involved CPD member, as required by this paragraph.

Moving forward, for the CPD, we will look for documentation demonstrating that the CPD is conducting its processes in accordance with ¶504's mandates and for them to continue to review and review, if necessary, their S08-01-018, *Post Investigation Log Number Procedures*, policy. For COPA, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance.

Paragraph 504 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:

None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:

None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:

Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:

Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:

Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:

Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:

Secondary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:

Secondary

Accountability and Transparency: ¶511

511. In order to develop a new mediation policy governing the resolution of disciplinary actions by the agreement of the CPD member and non-CPD member complainant, the City will solicit public input, through community engagement efforts, regarding the methods by which mediation will most effectively build trust between community members and police and foster mutual respect.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)

In the twelfth reporting period, the City and COPA achieved Full compliance with ¶511.

Prior to the twelfth reporting period, COPA achieved Preliminary and Secondary compliance by engaging with outside experts to assist with community engagement efforts and providing the IMT with the experts' qualifications, a summary of the mediation project, and notes regarding community feedback from learning sessions.

To assess Full compliance, the IMT reviewed documentation, including presentations and other materials, which describes COPA's community engagement efforts with the public and CPD members from 2020 to the present regarding the City's mediation program. These community engagement efforts included meetings at five local libraries that allowed for large dialogue with constituents and the opportunity for smaller group discussions on the Community Mediation Program policy, operations, and staffing community mediators. These engagements were also recorded to capture key highlights and shared with the public. The outreach efforts emphasized the use of mediation to foster community trust between CPD members and the community with respect to misconduct investigations and discipline. Notably, prior to this reporting period, the City and COPA created a new Director of Mediation position, housed within COPA, to oversee the City's mediation program.

Moving forward, we expect to receive documentation of any ongoing community outreach efforts each reporting period to maintain Full compliance.

Paragraph 511 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:

Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:

Secondary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:

Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:

Secondary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:

Secondary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:

Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:

Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:

Secondary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:

Full

Accountability and Transparency: ¶530

530. Within 90 days of the Effective Date, COPA and BIA will create separate initial and in-service training plans.

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (NINTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NEW)

In the twelfth reporting period, COPA achieved Full compliance, and the City and the CPD maintained Secondary compliance with ¶530. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶530.

Prior to the twelfth reporting period, COPA achieved Preliminary and Secondary compliance by providing and revising its *Training and Professional Development Department Training Plan* and developing initial and in-service training courses in accordance with the plan.

To assess Full compliance for COPA, the IMT reviewed COPA's *2025-2026 Training Plan*, training records, and training evaluation records. Additionally, COPA produced its *Faculty Development Frameworks*, which expands and supplements prior productions that explain how training and lesson plans are developed, how training instructors are selected and developed, and the process for evaluation of training courses and instructors.

Moving forward, for the CPD, we will look for documentation demonstrating that the CPD is acting in accordance with ¶530's mandates and for them to periodically review and revise, if necessary, their S08-01, *Complaint and Disciplinary Investigators and Investigations* policy. For COPA, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance.

Paragraph 530 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
None

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
None

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
None

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
Secondary

Accountability and Transparency: ¶548

548. *Within 180 days following the expiration of each calendar year of the term of this Agreement, the City will produce and publish an annual report describing certain legal activity involving CPD during the previous calendar year (“CPD Annual Litigation Report”). The CPD Annual Litigation Report will not include any specific information or data that may not be disclosed pursuant to applicable law. Subject to applicable law, the CPD Annual Litigation Report will address: a. a list of civil lawsuits in which the plaintiff(s) seek(s) to hold the City responsible for the conduct of one or more current or former CPD members and information that either (i) the lawsuit was concluded by final order and all opportunities for appellate review were exhausted, or (ii) any judgment was satisfied during the prior calendar year. This list will include civil lawsuits handled by the City’s Department of Law’s (“DOL’s”) Federal Civil Rights Division, as well as lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle pursuit, only. b. for each case identified in (a) above, the following information will be provided in spreadsheet or open-data format: i. case name; ii. case number; iii. the date the trial court entered the final order; iv. a list of the parties at the time the final order was entered; v. the nature of the order (e.g., dismissal with prejudice, summary judgment for plaintiff(s)/defendant(s), judgment of not liable, judgment of liable); vi. the amount of the compensatory and punitive damages awarded (if applicable); and vii. the amount of attorney’s fees and costs awarded (if applicable). c. a list of civil lawsuits in which the plaintiff(s) seek(s) to hold the City responsible for the conduct of one or more current or former CPD members and a settlement was reached (including approval by City Council, if applicable) during the prior calendar year. This list will include civil lawsuits handled by DOL’s Federal Civil Rights Division, as well as such lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle pursuit, only. d. for each case identified in (c) above, the following information will be provided in spreadsheet or open-data format: i. case name; ii. case number; iii. a list of the parties at the time the case was settled; iv. the amount of the settlement; and v. the amount of settlement allocated to attorney’s fees and costs (if known). e. the amount of attorney’s fees paid by the City during the prior calendar year to outside counsel engaged to defend the City and/or one or more current or former CPD members in civil lawsuits handled by DOL’s Federal Civil Rights Division, as well as such lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle pursuit, only. This amount will be presented in the aggregate. f. for all individually named defendants in the cases identified in (a) and (c) above, the status (e.g., pending with BIA/COPA/OIG or charges sustained, not sustained, unfounded, or exonerated by BIA/COPA/OIG) of any administrative investigation(s) by BIA, COPA, or OIG at the time the trial court entered its final order or the settlement was reached. g. the disposition of any felony criminal prosecutions of current or former CPD members from the previous year. h. the number of pending civil lawsuits that seek to hold the City responsible for one or more current or former CPD members that the City is defending. This number will include civil lawsuits handled by the Department of Law’s Federal Civil Rights Division, as well as lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle only.*

Compliance Progress

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

Recurring Schedule: Annually



Met



Missed

Preliminary: *In Compliance* (TENTH REPORTING PERIOD)

Secondary: *In Compliance* (NEW)

Full: *Not Yet Assessed*

In the twelfth reporting period, the City and the CPD achieved Secondary compliance with ¶548.

To assess Secondary compliance, the IMT reviewed the City's *2024 Litigation Report*. The report appropriately addresses the requirements of ¶548 by including data and discussion regarding the total number of lawsuits concluded by a final order of settlement, court or jury verdict, or dismissal.

In prior reports, we noted concerns regarding the timeliness of the annual litigation report because the City consistently missed the 180-day deadline. However, the City timely submitted its 2023 and 2024 reports, which helps alleviate the IMT's concerns.

Moving forward, the City must demonstrate that it will continue to timely submit its annual litigation report and that the annual litigation report continues to meet the requirements of this paragraph to achieve Full compliance.

Paragraph 548 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:

Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:

Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:

None

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:

None

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:

None

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:

Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:

Preliminary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:

Secondary

Accountability and Transparency: ¶553

553. Beginning in 2020, CPD will audit, on at least an annual basis, the investigation and disciplinary process involving complaints investigated by BIA and the districts to ensure that the investigations are conducted in accordance with BIA policies and this Agreement. The audits will include completed investigations and the recommendations of discipline. CPD will make public any of the audit findings, ensuring that any personally identifiable information is redacted.

Compliance Progress

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

Preliminary:	In Compliance (ELEVENTH REPORTING PERIOD)
Secondary:	In Compliance (ELEVENTH REPORTING PERIOD)
Full:	In Compliance (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶553.

Prior to the twelfth reporting period, the CPD achieved Preliminary and Secondary compliance by finalizing G08-01, *Complaint and Disciplinary System*, and providing the CPD’s *Audit of 2023 Investigation Timeframe Requirements*.

To assess Full compliance, the IMT reviewed the CPD’s *Audit of 2024 Investigation Timeframe Requirements*,²² which the CPD has produced consecutively for three years now. The audit sufficiently addresses the requirements of this paragraph and is publicly available as required by this paragraph.²³ However, the IMT notes that the audit raises serious concerns regarding the CPD’s compliance with timelines during this reporting period, which we will continue to monitor under related paragraphs related to timeliness. We will also monitor the CPD’s action plan(s) for remedying the deficiencies identified in the audit.

Moving forward, to maintain Full compliance, the CPD must continue to demonstrate that it conducts audits on an annual basis, that the audits are sufficient, and that the audits are published in a timely manner. In addition, the CPD must periodically review and revise, if necessary, their G08-01, *Complaint and Disciplinary System*, policy.

²² The *Audit of 2024 Investigation Timeframe Requirements* was also produced for Secondary compliance review with ¶¶446, 471, 472, 474, 498, and 500, and for Full compliance review with ¶447. However, the audit alone is insufficient to demonstrate compliance with those paragraphs.

²³ See *Audit of 2024 Investigation Timeframe Requirements*, https://www.chicagopolice.org/wp-content/uploads/25-002-Audit_BIA_Timeframes_FINAL_19May2025.pdf.

Paragraph 553 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶564

564. *The Deputy PSIG will exercise his or her discretionary and oversight responsibilities without interference from any person, group, or organization, including CPD, COPA, the Police Board, and City officials. Any person that knowingly interferes with the Deputy PSIG's performance of his or her duties will be subject to the penalties set forth in Municipal Code of Chicago Sections 2-56-140, 145, 270.*

Compliance Progress		(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:		<i>In Compliance</i> (TENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	Police Board	<i>In Compliance</i> (TENTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
	Police Board	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)
	Police Board	<i>In Compliance</i> (NEW)

In the twelfth reporting period, the Police Board achieved Full compliance, COPA maintained Full compliance, and the City and the CPD maintained Secondary compliance with ¶564. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To maintain Full compliance, COPA provided documentation that COPA checks in with the PSIG as part of its monthly calls with the OIG, as well as an announcement provided to all COPA staff prohibiting PSIG interference. COPA continues to engage in procedures to ensure any such interference is detected and reported appropriately.

The CPD did not produce any documentation that demonstrated efforts related to ¶564.

Before the twelfth reporting period, the Police Board achieved Preliminary and Secondary compliance by finalizing and implementing its *Policy Regarding Deputy Public Safety Inspector General Review and Audits*.

To assess Full compliance, the IMT reviewed the Police Board’s system in place to detect and report any interference and implement appropriate remedies. The Police Board also provided information regarding the Deputy PSIG’s requests and the Police Board’s responses.

Additionally, as in past reporting periods, the Deputy PSIG provided a memorandum stating that “PSIG is unaware of any interference from any person, group, organization—including CPD, COPA, the Police Board, and City officials—that has impaired or affected its ability to conduct its discretionary and oversight responsibilities.”

Moving forward, we will determine whether the CPD has systems in place to detect and report any interference and implement appropriate penalties and look for the CPD to periodically review and revise, if necessary, G08-01, *Complaint and Disciplinary System*. For the Police Board, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule to maintain Full compliance.

Paragraph 564 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Full