

Independent Monitoring Report 14

Accountability and Transparency

Compliance Assessments by Paragraph

Specific compliance assessments, by paragraph, for the Accountability and Transparency section are available here. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance. A fuller description of the history of compliance efforts, methodologies, and compliance determinations for each original monitorable paragraph 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: ¶432

432. *The City and CPD will require that complaints about any CPD member are accepted, documented, submitted to COPA, and investigated even if the complainant could not identify the CPD member's name or other employee-identifying number, including star or badge number.*

Compliance Progress (Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i> ¹
	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 (NINTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance with the requirements of ¶432, and COPA maintained Full compliance with the requirements of ¶432.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by finalizing its G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. The CPD achieved Secondary compliance in the eighth reporting period by finalizing and delivering its *BIA eLearning*, which addressed the requirements of ¶432.

To assess Full compliance this reporting period, the IMT reviewed a sample of 119 investigations conducted by BIA investigators and Accountability Sergeants that document investigative actions of complaints against unknown CPD members. These investigative actions include a review of various CPD reports, documents related to the incident, body-worn-camera footage, witness interviews (where applicable), and other evidence. These investigations demonstrate that the CPD accepts and investigates complaints even if the CPD member could not be identified, as required by this paragraph. However, the CPD did not provide evidence that it submits complaints against unknown CPD members within COPA's jurisdiction to

¹ The Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

COPA. The CPD must provide additional documentation that shows the total number of complaints against unknown CPD members, which of those complaints were submitted to COPA, and which of those complaints were investigated by BIA.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the fourth reporting period by finalizing its *Intake* policy. COPA achieved Secondary compliance in the fifth reporting period by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures* training. COPA achieved Full compliance in the ninth reporting period by providing a memorandum with supporting documentation to show that it performs full investigations of all complaints regardless of whether the identity of the officer is known. Since the ninth reporting period, COPA continued to provide evidence demonstrating that it performs full investigations of complaints regardless of whether the identity of the officer is known, as required by this paragraph.

To maintain Full compliance this reporting period, the IMT reviewed a spreadsheet that identified anonymous and unknown officer investigations and listed how they were concluded and COPA's review. In prior reporting periods, COPA also provided supporting documentation such as screenshots and Final Summary Reports (FSRs) or administrative closure letters, but those supporting documents were not included in COPA's production this reporting period. In order to maintain Full compliance, COPA must provide additional documentation supporting the actions identified in the spreadsheet. Additionally, to maintain Full compliance this reporting period, the IMT reviewed evidence that COPA reviewed and revised, as appropriate, its *Intake* policy pursuant to the COPA Stipulation Regarding the Policy and Training and Review Process.

Moving forward, for the CPD, we will look for documentation that the CPD submits complaints against unknown CPD members within COPA's jurisdiction to COPA. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Intake* policy and its *COPA Intake Unit: Overview of Policies and Procedures* training to maintain Full compliance.

Paragraph 432 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: Secondary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Accountability and Transparency: ¶433

433. CPD will require that officers provide their name and star number, or in the case of non-sworn members other employee identifying number, to any member of the public, upon request.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:	In Compliance (SIXTH REPORTING PERIOD)
Secondary:	In Compliance (EIGHTH REPORTING PERIOD)
Full:	In Compliance (NEW)

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶433.

Before the fourteenth reporting period, the CPD achieved Preliminary compliance in the sixth reporting period by finalizing its G02-01, *Protection of Human Rights*. The CPD achieved Secondary compliance in the eighth reporting period by finalizing and delivering its *BIA eLearning*, which addressed the requirements of ¶433.

To maintain Secondary compliance this reporting period, the CPD provided documentation of its two-year review of G02-01, *Protection of Human Rights*. As part of the two-year review, the CPD posted the policy online for public comment and had members from the CPD’s TRED Unit, Training Division, Office of Equity and Engagement, Accreditation Section, Professional Standards and Compliance Division, and Legal Affairs Division review the policy. The CPD revised the policy, as appropriate, to reflect the correct Municipal Code of Chicago sections and to require annual administrative review of the CPD’s data related to discriminatory policing.

To assess Full compliance this reporting period, the IMT reviewed a sample of 53 complaint registers and Administrative Summary Reports (ASRs) of log number investigations for failure of a CPD member to identify their name and star number or employee identifying number from 2023 through 2025. The IMT also reviewed a spreadsheet listing of all log number complaints for a failure of a CPD member to identify for the same period, which included 557 instances. These investigations demonstrate that the CPD is enforcing the mandate for officers to provide their name and star number, or employee identifying number, to any member of the public, upon request.

Moving forward, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its G02-01 policy, *Protection of Human Rights*, and its *BIA eLearning* to maintain Full compliance.

Paragraph 433 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: None	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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶435

435. *The City, CPD, and COPA will require that complaints alleging that a CPD member refused to accept a complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint are accepted, documented, and submitted to COPA for investigation and, where appropriate, recommended for discipline.*

Compliance Progress (Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i> ²
	CPD	<i>In Compliance (SEVENTH 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>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶435, and COPA maintained Full compliance with the requirements of ¶435.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the seventh reporting period by finalizing its G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. The CPD achieved Secondary compliance in the eighth reporting period by finalizing and delivering its *BIA eLearning*, which addressed the requirements of ¶435.

To assess Full compliance this reporting period, the IMT reviewed a sample of 64 complaint intake records, a sample of 16 misconduct complaints from 2023 through 2025, and the respective ASRs of investigations conducted by BIA investigators and Accountability Sergeants. These complaints, intake records, and reports demonstrate that the CPD accepts, documents, and submits to COPA for investigation complaints alleging a CPD member refused to accept a complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint.

² As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the fourth reporting period by finalizing its *Intake* policy. COPA achieved Secondary compliance in the fifth reporting period by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures* training. COPA achieved Full compliance in the seventh reporting period by providing a spreadsheet detailing approximately 57 violations of failing to accept a complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, therefore demonstrating COPA's investigations into such complaints. Since the seventh reporting period, COPA continued to provide evidence demonstrating that it investigates complaints alleging that a CPD member refused to accept a complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint.

To maintain Full compliance this reporting period, the IMT reviewed evidence that COPA reviewed and revised, as appropriate, its *Intake* policy pursuant to the COPA Stipulation Regarding the Policy and Training and Review Process.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its G08-01-02 policy, *Complaint Initiation and Log Number Investigation Assignment*, and its *BIA eLearning* to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Intake* policy and its *COPA Intake Unit: Overview of Policies and Procedures* training to maintain Full compliance.

Paragraph 435 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: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Under Assessment	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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 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, 2026, through June 30, 2026)

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

In the fourteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶451.

Before the fourteenth reporting period, to assess Secondary compliance, the IMT reviewed the CPD's *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices in the eleventh reporting period. This reporting period, the IMT reviewed documentation that at least 95% of CPD members had completed the *BIA Accountability Supplemental eLearning*.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶451's mandates. The IMT and the CPD are having discussions on what documentation is needed to demonstrate Full compliance.

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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Preliminary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Accountability and Transparency: ¶453

453. *If a criminal investigation of a CPD member’s conduct has commenced, COPA, BIA, or the Accountability Sergeant will continue the administrative investigation, absent specific circumstances that would jeopardize the criminal investigation. In such circumstances, the determination to postpone the administrative investigation, along with the rationale for doing so, will be documented by COPA, BIA or the district in writing.*

Compliance Progress (Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i> ³
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶453, and COPA maintained Full compliance with the requirements of ¶453.

For the CPD, before the fourteenth reporting period, the CPD reached Preliminary compliance in the seventh reporting period by finalizing its S08-01-05, *Conducting Log Number Investigations*. The CPD reached Secondary compliance in the eleventh reporting period by finalizing and delivering its *BIA Accountability Supplemental eLearning* and its *BIA In-Service Training: Collection of Evidence and Interviews with Non-Department Members*, which addressed the requirements of this paragraph.

To assess Full compliance this reporting period, the IMT reviewed a spreadsheet identifying 93 related criminal and administrative investigations involving CPD members, along with the status of each administrative investigation conducted by BIA or COPA, including whether it was under investigation, in command channel review, in advocate review, or closed. The IMT also reviewed a random sample of

³ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

seven Final Summary Reports (FSRs) and other documents from the related investigations, such as case management system screenshots of the complaint history and quick review reports. The documentation demonstrated that BIA continued administrative investigations while a related criminal investigation was conducted, as required by this paragraph.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the fifth reporting period by finalizing its *Fact Gathering & the Investigative Process* policy. COPA reached Secondary compliance in the seventh reporting period by finalizing and delivering its *Fact Gathering-Evidence Collection* training. COPA reached Full compliance in the ninth reporting period by providing documentation evidencing that COPA has conducted a search of cases relevant to the requirements of ¶453 and cannot identify any cases or investigations where an administrative investigation was postponed while a criminal investigation was conducted since 2019. Since the ninth reporting period, COPA continued to provide evidence demonstrating that it continues to investigate administrative cases while a related criminal investigation was conducted.

To maintain Full compliance this reporting period, the IMT reviewed a memorandum and spreadsheet that demonstrate COPA continues to investigate administrative cases while a related criminal investigation was conducted, as required by this paragraph.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its S08-01-05 policy, *Conducting Log Number Investigations*, its *BIA Accountability Supplemental eLearning*, and its *BIA In-Service Training: Collection of Evidence and Interviews with Non-Department Members* to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Fact Gathering & the Investigative Process* policy and its *Fact Gathering-Evidence Collection* training to maintain Full compliance.

Paragraph 453 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

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

FOURTEENTH REPORTING PERIOD
JANUARY 1, 2026 – JUNE 30, 2026

COMPLIANCE PROGRESS:
Full

Accountability and Transparency: ¶476

476. *The City, CPD, and COPA will require that COPA and BIA supervisors regularly communicate with the investigators under their supervision, including Accountability Sergeants, to evaluate the progress of administrative investigations.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary: *In Compliance* (FIFTH REPORTING PERIOD)⁴

CPD *In Compliance* (FIFTH REPORTING PERIOD)

COPA *In Compliance* (FOURTH REPORTING PERIOD)

Secondary: *In Compliance* (NEW)

CPD *In Compliance* (NEW)

COPA *In Compliance* (EIGHTH REPORTING PERIOD)

Full: *In Compliance* (NEW)

CPD *In Compliance* (NEW)

COPA *In Compliance* (NINTH REPORTING PERIOD)

In the fourteenth reporting period, the City and the CPD achieved Secondary and Full compliance with the requirements of ¶476, and COPA maintained Full compliance with the requirements of ¶476.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by finalizing its S08-01, *Complaint and Disciplinary Investigators and Investigations*. During the thirteenth reporting period, the IMT reviewed the CPD’s *BIA In-Service Training eLearning Module: Interviewing Department Members*, which addressed the requirements of this paragraph. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices for the training in the thirteenth reporting period.

To assess Secondary compliance this reporting period, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants had completed the *BIA In-Service Training eLearning Module: Interviewing Department Members*.

To assess Full compliance this reporting period, the IMT reviewed a spreadsheet that contains records of quarterly case reviews between BIA Lieutenants and BIA investigators, a spreadsheet that tracks communications between BIA Lieutenants

⁴ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

and Accountability Sergeants, and a report of email communications between BIA supervisors and Accountability Sergeants from 2023 through 2025. The spreadsheets and report demonstrate that BIA Lieutenants regularly communicate with the investigators under their supervision, including Accountability Sergeants, to evaluate the progress of administrative investigations, as required by this paragraph.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the fourth reporting period by finalizing its *Timeliness Benchmarks* policy. COPA achieved Secondary compliance in the eighth reporting period by finalizing and delivering its *Conflicts of Interest* training. COPA achieved Full compliance in the ninth reporting period by providing documentation of five case examples, which included communication between supervisors and investigators. COPA also produced eighteen case examples that demonstrate COPA supervisors regularly communicate with their investigators regarding the progress of administrative investigations. Since the ninth reporting period, COPA continued to provide evidence demonstrating that COPA supervisors regularly communicate with their investigators regarding the progress of administrative investigations, as required by this paragraph.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its S08-01 policy, *Complaint and Disciplinary Investigators and Investigations*, and its *BIA In-Service Training eLearning Module: Interviewing Department Members* to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Timeliness Benchmarks* policy and its *Conflicts of Interest* training to maintain Full compliance.

Paragraph 476 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: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Preliminary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶477

477. *The City and CPD will undertake best efforts to ensure that all complaints, including anonymous complaints, can be the subject of a misconduct investigation.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)⁵

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* (SEVENTH REPORTING PERIOD)

Full: *In Compliance* (NEW)

CPD *In Compliance* (NEW)

COPA *In Compliance* (NINTH REPORTING PERIOD)

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶477, and COPA maintained Full compliance with the requirements of ¶477.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the fourth reporting period by finalizing its G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. The CPD achieved Secondary compliance in the ninth reporting period by finalizing and delivering its *BIA In-Service Training: Complaint Management System and Complete Investigatory Files* and its *BIA In-Service Training: Complaint Initiation and Affidavit Overrides*.

To assess Full compliance this reporting period, the IMT reviewed a spreadsheet listing unknown or anonymous complaints with brief incident descriptions, as well as a sample of 30 ASRs and administrative closure letters. The sample of reports included both BIA and Accountability Sergeant investigations and demonstrated that the unknown or anonymous complaints were investigated to the extent possible, as required by this paragraph.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the fourth reporting period by finalizing its *Fact Gathering & the Investigative Process* policy. COPA achieved Secondary compliance in the seventh

⁵ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

reporting period by finalizing and delivering its *Fact Gathering-Evidence Collection* training. COPA achieved Full compliance in the ninth reporting period by providing documentation of anonymous complaints investigated during that reporting period. Since the ninth reporting period, COPA has continued to provide evidence demonstrating that it investigates anonymous complaints.

To maintain Full compliance this reporting period, the IMT reviewed a spreadsheet that identified anonymous and unknown officer investigations and listed how the investigations were concluded. In prior reporting periods, COPA also provided supporting documentation such as screenshots and Final Summary Reports (FSRs) or administrative closure letters, but those supporting documents were not included in COPA's production this reporting period. In order to maintain Full compliance, COPA must provide additional documentation supporting the actions identified in the spreadsheet.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its G08-01-02 policy, *Complaint Initiation and Log Number Investigation Assignment*, its *BIA In-Service Training: Complaint Management System and Complete Investigatory Files*, and its *BIA In-Service Training: Complaint Initiation and Affidavit Overrides* to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Fact Gathering & the Investigative Process* policy and its *Fact Gathering-Evidence Collection* training to maintain Full compliance.

Paragraph 477 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: Secondary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶488

488. *In addition to the general investigative requirements established in this Agreement, with respect to the investigation of officer-involved shootings and deaths, the City and CPD will ensure that: a. COPA investigators be provided the opportunity to participate in the preliminary assessment during the immediate aftermath of an officer-involved shooting or death to the same extent as any CPD member or any other law enforcement agency investigating the incident; b. the Chief Administrator of COPA, or his or her designee, is present for the first viewing by CPD of available video or audio material related to the incident and when any audio or video material is collected and preserved at or near the scene from CPD or third-party surveillance systems. i. the requirements of subparagraph (b), above, will not apply if: (1) the Chief Administrator of COPA, or his or her designee, has been informed of the incident and is not available; and (2) COPA is not on scene and there is a public safety need to review or listen to certain available audio or video prior to the COPA arrival on scene. c. there is written documentation identifying each CPD member who viewed video evidence or listened to audio evidence at the scene; d. within 30 days of the Effective Date, CPD issues a policy providing that: i. involved and witness CPD members do not discuss the facts relating to the incident with any witness until interviewed by COPA, except to the extent necessary to ensure public safety, as instructed by counsel in relation to civil or criminal proceedings, or participating in CPD officer wellness programs; ii. COPA may extend the prohibition on discussion to the extent necessary to preserve the integrity of the investigation; and iii. in no event may this prohibition extend beyond the final disciplinary decision, if any. e. involved and witness CPD members will be separated, transported separately from the scene, and monitored to avoid contact or communications relating to the incident until released by the responding supervisor at or above the rank of Commander; f. administrative interviews of involved and witness CPD members will be audio recorded and, where possible, video recorded, with COPA investigators present, except that a member may speak with his or her attorney or union representative in private; and g. investigators will not delay interviewing involved and witness CPD members, and will conduct such interviews as soon as feasible, consistent with any applicable collective bargaining agreement. Investigators will document, and make part of the administrative investigative file, all requests made on behalf of involved or witness CPD members to reschedule an interview.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary: *In Compliance (NEW)*⁶

CPD *In Compliance (NEW)*

COPA *In Compliance (SIXTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

CPD *Not in Compliance*

COPA *In Compliance (SEVENTH REPORTING PERIOD)*

Full: *Not in Compliance*

CPD *Not Yet Assessed*

COPA *Under Assessment (NINTH REPORTING PERIOD)*

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶488, and COPA maintained Secondary compliance and is under assessment for Full compliance with the requirements of ¶488. 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 Secondary compliance.

For the CPD, to assess Preliminary compliance this reporting period, the IMT reviewed the CPD's G03-06 policy series, which addresses the requirements of this paragraph. The policy series included the following: G03-06, *Firearm Discharge and Officer-Involved Death Incident*; G03-06-01, *Firearm Discharge and Officer-Involved Death Incident—Immediate Response*; and G03-06-02, *Firearm Discharge and Officer-Involved Death Incident—Investigation*. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices following years of discussions and revisions, including disputes regarding Public Safety Briefings that were ultimately resolved by the Court.

Moving forward, for the CPD, we will look for the CPD to develop and provide training covering the requirements of this paragraph. For COPA, we look forward to receiving additional information related to this paragraph to ensure that COPA and its staff are acting in accordance with ¶488's mandates.

⁶ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

Paragraph 488 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:
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:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
None

FOURTEENTH REPORTING PERIOD
JANUARY 1, 2026 – JUNE 30, 2026

COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶489

489. *The City recognizes that officer-involved shootings are traumatic incidents. The City and CPD are committed to treating all impacted with dignity and respect.*

Compliance Progress		(Reporting Period: January 1, 2026, through June 30, 2026)
Preliminary:	CPD	In Compliance (NEW) ⁷
	COPA	In Compliance (SIXTH REPORTING PERIOD)
Secondary:	CPD	Not in Compliance
	COPA	In Compliance (SEVENTH REPORTING PERIOD)
Full:	CPD	Not Yet Assessed
	COPA	In Compliance (EIGHTH REPORTING PERIOD)

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶489, and COPA maintained Full compliance with the requirements of ¶489. 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 Secondary compliance.

For the CPD, to assess Preliminary compliance this reporting period, the IMT reviewed the CPD’s G03-06 policy series, which addresses the requirements of this paragraph. The policy series included the following: G03-06, *Firearm Discharge and Officer-Involved Death Incident*; G03-06-01, *Firearm Discharge and Officer-Involved Death Incident—Immediate Response*; and G03-06-02, *Firearm Discharge and Officer-Involved Death Incident—Investigation*. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices following years of discussions and revisions, including disputes regarding Public Safety Briefings that were ultimately resolved by the Court.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the sixth reporting period by finalizing its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy. COPA achieved Secondary compliance in the seventh reporting period by finalizing and delivering its *Major Case Incident Responses* training. COPA achieved Full compliance in the

⁷ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

eighth reporting period by providing a memorandum detailing its efforts in meeting those affected by, and involved in, officer-involved shootings, including how and where those meetings were conducted. Since the eighth reporting period, COPA continued to provide evidence demonstrating that COPA treats those affected by, and involved in, officer-involved shootings with dignity and respect.

To maintain Full compliance this reporting period, the IMT reviewed an updated memorandum detailing COPA’s efforts in meeting those affected by, and involved in, officer-involved shootings, including how and where those meetings were conducted. COPA demonstrates its commitment to treating those impacted with dignity and respect by keeping them informed on investigation updates, offering in-person and virtual meetings to accommodate their needs, welcoming their attorney or spiritual advisor to the meetings, slowing down, pausing, or repeating videos at their request, and answering any questions related to the investigative process.

Moving forward, for the CPD, we will look for the CPD to develop and provide training covering the requirements of this paragraph. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy and its *Major Case Incident Responses* training to maintain Full compliance.

Paragraph 489 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: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: None	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Preliminary	

Accountability and Transparency: ¶490

490. *The City and CPD are committed to ensuring their actions do not unreasonably impede access to information for families of the injured and deceased.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:

In Compliance (NEW)⁸

CPD

In Compliance (NEW)

COPA

In Compliance (SIXTH REPORTING PERIOD)

Secondary:

Not in Compliance

CPD

Not in Compliance

COPA

In Compliance (SEVENTH REPORTING PERIOD)

Full:

Not in Compliance

CPD

Not Yet Assessed

COPA

In Compliance (EIGHTH REPORTING PERIOD)

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶490, and COPA maintained Full compliance with the requirements of ¶490. 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 Secondary compliance.

For the CPD, to assess Preliminary compliance this reporting period, the IMT reviewed the CPD's G03-06 policy series, which addresses the requirements of this paragraph. The policy series included the following: G03-06, *Firearm Discharge and Officer-Involved Death Incident*; G03-06-01, *Firearm Discharge and Officer-Involved Death Incident—Immediate Response*; and G03-06-02, *Firearm Discharge and Officer-Involved Death Incident—Investigation*. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices following years of discussions and revisions, including disputes regarding Public Safety Briefings that were ultimately resolved by the Court.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the sixth reporting period by finalizing its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy. COPA achieved Secondary compliance in the seventh reporting period by finalizing and delivering its *Major Case Incident Responses* training. COPA achieved Full compliance in the

⁸ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

eighth reporting period by providing a memorandum detailing its efforts in meeting those affected by, and involved in, officer-involved shootings, including how and where those meetings were conducted. Since the eighth reporting period, COPA continued to provide evidence demonstrating that COPA's actions do not unreasonably impede access to information for families of the injured and deceased.

To maintain Full compliance this reporting period, the IMT reviewed an updated memorandum detailing COPA's efforts in meeting those affected by, and involved in, officer-involved shootings, including how and where those meetings were conducted. COPA demonstrates its efforts to make information accessible by providing investigation updates, conducting in-person and virtual meetings, sharing video footage, and answering any questions related to the investigative process.

Moving forward, for the CPD, we will look for the CPD to develop and provide training covering the requirements of this paragraph. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy and its *Major Case Incident Responses* training to maintain Full compliance.

Paragraph 490 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: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: None	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Preliminary	

Accountability and Transparency: ¶491

491. *In addition to the investigative requirements set forth in this Agreement, with respect to officer-involved shootings and officer-involved deaths, the City and CPD will ensure that CPD members act in a manner that is consistent with CPD's commitment to the principle of the sanctity of life, and will treat the deceased with respect, including the prompt screening from public view or covering of the deceased and, following timely evidence collection procedures, removal of the deceased.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

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

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶491.

To assess Preliminary compliance this reporting period, the IMT reviewed the CPD's G03-06 policy series, which addresses the requirements of this paragraph. The policy series included the following: G03-06, *Firearm Discharge and Officer-Involved Death Incident*; G03-06-01, *Firearm Discharge and Officer-Involved Death Incident—Immediate Response*; and G03-06-02, *Firearm Discharge and Officer-Involved Death Incident—Investigation*. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices following years of discussions and revisions, including disputes regarding Public Safety Briefings that were ultimately resolved by the Court.

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

Paragraph 491 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:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
None

FOURTEENTH REPORTING PERIOD
JANUARY 1, 2026 – JUNE 30, 2026

COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶494

494. CPD will require that: a. investigations completed by Accountability Sergeants are held to the same investigative standards as those completed by BIA; b. beginning in 2020, and by January 31, 2022, each District Commander designates at least two Accountability Sergeants who will report to the District Commander, and whose primary responsibility is receiving, processing, and investigating complaints against CPD members; c. before a Sergeant is designated an Accountability Sergeant, his or her name will be provided by his or her District Commander to BIA for BIA's review; d. each Accountability Sergeant is provided with the name of and contact information for the BIA Lieutenant responsible for reviewing the Accountability Sergeant's work; e. BIA Lieutenants provide regular case-related and overall performance feedback to each of the Accountability Sergeants and his or her respective District Commander; f. BIA Lieutenants review and approve all of the Accountability Sergeant's proposed investigative findings and disciplinary recommendations; g. all Accountability Sergeants and BIA Lieutenants have access to the PRS or any system replacing the PRS; h. all Accountability Sergeants have access to BIA policies, directives, protocols, and training materials; and i. all Accountability Sergeants receive the initial and in-service training provided to BIA investigators as provided for in this Agreement.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

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

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶494.

To assess Preliminary compliance this reporting period, the IMT reviewed the CPD's revised S08-01, *Complaint and Disciplinary Investigators and Investigations* policy. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices, and the CPD posted its revised S08-01 policy for public comment.

Moving forward, we will look for the CPD to provide the finalization packet for this policy including information on public comments and policy implementation and to develop and provide training covering the requirements of this paragraph.

Paragraph 494 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: 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: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: None	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Preliminary	

Accountability and Transparency: ¶498

498. *The City and CPD will ensure that any command channel review conducted is complete within 30 days. Within 30 days of the Effective Date, CPD may draft a policy that provides, for the most serious administrative investigations, the circumstances under which up to 45 days will be provided for command channel review. The draft policy will be provided to the Monitor for review and approval.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:	<i>In Compliance</i> (SECOND REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶498.

Before the fourteenth reporting period, the CPD achieved Preliminary compliance in the second reporting period by finalizing its S08-01-07, *Command Channel Review*. The CPD achieved Secondary compliance in the third reporting period by finalizing and delivering its *Command Channel Review (CCR)* training.

To assess Full compliance this reporting period, the IMT reviewed a data report from the CPD’s case management system (CMS) identifying the individuals who conducted the command channel review as well as the date and time each review was completed. The CMS data, along with the command channel review history report, demonstrates that the command channel reviews are generally completed within 30 days or 45 days, as required by this paragraph.

Additionally, the IMT reviewed the CPD’s *Audit of 2025 Investigation Timeframe Requirements*.⁹ The audit found that approximately 85% of cases had the command channel review fully completed within the 30-day or 45-day timeframe, as required by this paragraph. The audit, however, also identified deficiencies in the third-level command channel review process related to properly identifying cases that require a third level of review. Only half of the cases (31 out of 62) that required a third-level command channel review received one. The IMT will look for the CPD to address these deficiencies in future reporting periods.

Moving forward, we expect to receive evidence of continued compliance each reporting period and for the CPD to work to address the deficiencies identified in the audit to maintain Full compliance. We will also look for the CPD to periodically

⁹ See *Audit of 2025 Investigation Timeframe Requirements*, https://www.chicagopolice.org/wp-content/uploads/26-003-AUDIT_BIA_Timeframes_Report_FINAL_28May2026.pdf.

review and revise its S08-01-07 policy, *Command Channel Review*, and its *Command Channel Review (CCR)* training to maintain Full compliance.

Paragraph 498 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: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
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: Secondary
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: Secondary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶512

512. *The City will ensure that within 365 days of the Effective Date, COPA and BIA have developed parallel policies regarding the mediation of misconduct complaints by non-CPD members. The policies will govern mediation of misconduct complaints involving non-CPD member complainants. The policies will specify, at a minimum, (a) the criteria for determining incidents eligible for resolution through mediation; (b) the goals of mediation, including efficiency, transparency, procedural justice, restorative justice, and strengthening public trust; (c) the steps in the mediation process; and (d) methods of communication with complainants regarding the mediation process and the opportunity to participate. Items (a) through (d) above will be consistent between the CPD and COPA mediation policies.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary: *In Compliance (NEW)*¹⁰

CPD *In Compliance (NEW)*

COPA *In Compliance (SEVENTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

CPD *Not in Compliance*

COPA *In Compliance (THIRTEENTH REPORTING PERIOD)*

Full: *Not in Compliance*

CPD *Not Yet Assessed*

COPA *Not in Compliance*

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶512, and COPA maintained Secondary compliance with the requirements of ¶512. 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 Secondary compliance.

For the CPD, to assess Preliminary compliance this reporting period, the IMT reviewed the CPD's revised D22-04, *Community-Police Mediation Program*, which addresses the requirements of ¶512. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices. The policy appropriately outlines the mediation process, including the criteria and goals of mediation, as required by this paragraph. The CPD posted its D22-04 policy for public comment

¹⁰ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

during the fourteenth reporting period and by the end of the reporting period finalized and implemented the policy on its website.

For COPA, to assess Full compliance this reporting period, the IMT reviewed COPA's documentation regarding its Community Mediation Program pilot, including documentation of its Community Mediator Selection Advisory group and the mediator training materials. The IMT appreciates COPA's significant efforts to develop the Community Mediation Program pilot. However, to achieve Full compliance, the IMT will need to review documentation demonstrating that the Community Mediation Program is no longer in a pilot phase and is operating as outlined in its policy.

Moving forward, for the CPD, we will look for the CPD to provide the finalization packet for this policy including information on public comments and policy implementation and to develop and provide training covering the requirements of this paragraph. For COPA, we will look for documentation that COPA is acting in accordance with ¶512's mandates.

Paragraph 512 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: 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: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: None	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Preliminary	

Accountability and Transparency: ¶517

517. *The City, CPD, and COPA will ensure that findings of “Sustained – Violation Noted, No Disciplinary Action”: a. may not be used in any investigation in which the conduct resulted in injury to any person; and b. will only be used for investigations that warrant a sustained finding, but were a result of unintentional violations of policy or law.*

Compliance Progress (Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i> ¹¹
CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Under Assessment</i>
CPD	<i>Under Assessment</i>
COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance with the requirements of ¶517, and COPA maintained Full compliance with the requirements of ¶517.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the seventh reporting period by finalizing its S08-01-05, *Conducting Log Number Investigations*. The CPD achieved Secondary compliance in the eleventh reporting period by finalizing and delivering its *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD maintained Secondary compliance in subsequent reporting periods by finalizing and delivering its *BIA In-Service Training: Credibility, Standards of Proof, and Disciplinary Decision* and its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*.

To assess Full compliance this reporting period, the IMT reviewed a listing of closed log number investigations with a finding “Sustained: Violations Noted-No Disciplinary Action” and a random sample of 42 Administrative Summary Reports (ASRs) from the listing of cases. The ASRs found policy violations that did not cause

¹¹ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

injury to a person and that were, in the investigator's opinion, unintentional violations of department policy or law. However, because some of the examples provided are arguably intentional violations on their face, the CPD should provide additional information on how it determines what constitutes an "unintentional" violation.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the fourth reporting period by finalizing its *Disciplinary and Remedial Recommendations* policy. COPA achieved Secondary compliance in the seventh reporting period by finalizing and delivering its *Case Management System: Overview of Policy and Procedures* training and its *Disciplinary and Remedial Recommendations* training. COPA achieved Full compliance in the ninth reporting period by providing a memorandum and supporting documents, including Final Summary Reports (FSRs), demonstrating compliance with this paragraph. Since the ninth reporting period, COPA continued to provide evidence demonstrating that COPA complies with § 517's mandates.

To maintain Full compliance this reporting period, the IMT reviewed a listing of closed log number investigations and a random sample of six FSRs from the listing of cases that found policy violations that did not cause injury to a person and that were unintentional violations of department policy or law, as required by this paragraph.

Moving forward, for the CPD, we will look for additional information regarding how the CPD determines what constitutes an "unintentional" violation of department policy or law. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its *Disciplinary and Remedial Recommendations* policy, its *Case Management System: Overview of Policy and Procedures* training, and its *Disciplinary and Remedial Recommendations* training to maintain Full compliance.

Paragraph 517 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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Accountability and Transparency: ¶521

521. *The City, CPD, and COPA will continue to build on these critical efforts by ensuring that BIA, COPA, the Police Board, and the Deputy PSIG have sufficient funding and an adequate number of qualified staff to fulfill their respective missions as required by law, each entity's policies, and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary: *In Compliance (ELEVENTH REPORTING PERIOD)*¹²

CITY *In Compliance (ELEVENTH REPORTING PERIOD)*

CITY/CPD *In Compliance (ELEVENTH REPORTING PERIOD)*

CITY/COPA *In Compliance (SEVENTH REPORTING PERIOD)*

Secondary: *In Compliance (NEW)*

CITY *In Compliance (NEW)*

CITY/CPD *In Compliance (NEW)*

CITY/COPA *In Compliance (NINTH REPORTING PERIOD)*

Full: *Not in Compliance*

CITY *Not Yet Assessed*

CITY/CPD *Not Yet Assessed*

CITY/COPA *In Compliance (TENTH REPORTING PERIOD)*

In the fourteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶521, and COPA maintained Full compliance with the requirements of ¶521. 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.

The City is responsible for providing necessary support and resources to the CPD, COPA, and the Police Board to allow them to fulfill their missions and obligations under the Consent Decree (see ¶706). To assess the City's compliance with ¶521, we assess each entity's funding, staffing, and equipment needs, while recognizing that the City is ultimately responsible to ensure each entity has adequate resources.

For the CPD, to assess Secondary compliance this reporting period, the IMT reviewed BIA's 2026 *Staffing and Equipment Needs Assessment and Implementation Plan*, which addresses the requirements of this paragraph. The plan acknowledges

¹² As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

that BIA and the districts have investigative personnel shortages, which is a concern for the IMT, but it also includes the CPD's plan to remedy the staffing shortages. Staffing shortages can adversely affect investigative case backlog as well as cause delays in case conclusion and investigation timeliness. The IMT will look for the CPD to address these staffing shortages in future reporting periods.

For COPA, in prior reporting periods, the IMT has reviewed COPA's *Staffing and Equipment Needs Plan*, which addressed the requirements of this paragraph. The plan included a detailed analysis of COPA's annual funding, staffing, and equipment needs.

For the Police Board, in prior reporting periods, the IMT has reviewed documentation indicating that it has adequate funding, staff, resources, training, and institutional support to fulfill its mission and duties.

Moving forward, for the CPD, we will look for the City and the CPD to address the staffing shortages and for documentation that the CPD is acting in accordance with ¶521's mandates. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule. For the Police Board, we will look for evidence that the Police Board continues to have adequate resources to fulfill its mission and duties.

Paragraph 521 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: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Preliminary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Accountability and Transparency: ¶522

522. *Within 365 days of the Effective Date, COPA, the Deputy PSIG, and BIA will create separate staffing and equipment-needs plans. Such plans will include analyses setting forth the basis for the plans' staffing requirements and equipment needs assessments. CPD will implement the staffing and equipment-needs plans in accordance with the specified timeline for implementation.*

Compliance Progress (Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:	<i>In Compliance (FIFTH REPORTING PERIOD)</i> ¹³
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Deputy PSIG	<i>In Compliance (SECOND REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Deputy PSIG	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Deputy PSIG ¹⁴	<i>In Compliance (FOURTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶522, and COPA maintained Full compliance with the requirements of ¶522. 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.

For the CPD, to assess Secondary compliance this reporting period, the IMT reviewed BIA's 2026 *Staffing and Equipment Needs Assessment and Implementation Plan*, which addresses the requirements of this paragraph. The plan acknowledges

¹³ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

¹⁴ The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period and maintained that Full compliance during subsequent reporting periods. In the eighth reporting period, the Deputy PSIG successfully completed its two-year sustainment period, marking two years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period, the Parties moved to release the OIG and the Deputy PSIG from Consent Decree requirements, which was granted by the Court.

that BIA and the districts have investigative personnel shortages, which is a concern for the IMT, but it also includes the CPD’s plan to remedy the staffing shortages. Staffing shortages can adversely affect investigative case backlog as well as cause delays in case conclusion and investigation timeliness. The IMT will look for the CPD to address these staffing shortages in future reporting periods.

Moving forward, for the CPD, we will look for the CPD to address the staffing shortages and for documentation that the CPD is acting in accordance with ¶522’s mandates. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule.

Paragraph 522 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: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Preliminary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Accountability and Transparency: ¶523

523. *On an annual basis, COPA, the Deputy PSIG, and BIA will review and revise, if needed, each entity's respective staffing and equipment-needs plans.*

Compliance Progress		(Reporting Period: January 1, 2026, through June 30, 2026)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD) ¹⁵
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (THIRD REPORTING PERIOD)
	Deputy PSIG	<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> (FIFTH REPORTING PERIOD)
	Deputy PSIG	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Full:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	Deputy PSIG ¹⁶	<i>In Compliance</i> (FOURTH REPORTING PERIOD)

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶523, and COPA maintained Full compliance with the requirements of ¶523.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by providing BIA's 2022 *Staffing and Equipment Needs Assessment and Implementation Plan*. The CPD achieved Secondary compliance in the eleventh reporting period by providing BIA's 2025 *Staffing and Equipment Needs Assessment and Implementation Plan*.

To assess Full compliance this reporting period, the IMT reviewed BIA's 2026 *Staffing and Equipment Needs Assessment and Implementation Plan*. The CPD has produced its annual staffing and equipment needs assessments for multiple years

¹⁵ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

¹⁶ The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period and maintained that Full compliance during subsequent reporting periods. In the eighth reporting period, the Deputy PSIG successfully completed its two-year sustainment period, marking two years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period, the Parties moved to release the OIG and the Deputy PSIG from Consent Decree requirements, which was granted by the Court.

now, which demonstrates that the CPD has developed a process for updating the plans on an annual basis as required by this paragraph. The CPD also provided documentation that its *Staffing and Equipment Needs Assessment and Implementation Plan* is provided to the Superintendent.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary compliance in the third reporting period by providing its *2020-21 Staffing and Equipment Needs Plan*. COPA achieved Secondary and Full compliance in the fifth reporting period by providing its *2021-22 Staffing and Equipment Needs Plan*. Since achieving Full compliance in the fifth reporting period, COPA has continued to provide its annual staffing and equipment needs plans for review.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the staggered production schedule.

Paragraph 523 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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶524

524. *BIA's staffing and equipment-needs plans will include the investigation staffing and equipment needs of the districts.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

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

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶524.

Before the fourteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by providing BIA's 2022 *Staffing and Equipment Needs Assessment and Implementation Plan*. The CPD achieved Secondary compliance in the eleventh reporting period by providing BIA's 2025 *Staffing and Equipment Needs Assessment and Implementation Plan*.

To assess Full compliance this reporting period, the IMT reviewed BIA's 2026 *Staffing and Equipment Needs Assessment and Implementation Plan*, which includes the investigation staffing and equipment needs of the districts, as required by this paragraph.

Moving forward, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance.

Paragraph 524 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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶525

525. Within 60 days of the Effective Date, the City will propose a permanent method of selecting the Chief Administrator of COPA. In creating the permanent selection method for COPA's Chief Administrator, the City will consider the views and recommendations of community stakeholders.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary: *In Compliance* (SECOND REPORTING PERIOD)
Secondary: *In Compliance* (TENTH REPORTING PERIOD)
Full: *In Compliance* (NEW)

In the fourteenth reporting period, the City and the CCPSA¹⁷ achieved Full compliance with the requirements of ¶525.

Before the fourteenth reporting period, the City reached Preliminary compliance in the second reporting period by providing its *Selection Method for Chief Administrator of COPA* memorandum. The City and the CCPSA reached Secondary compliance in the tenth reporting period by providing materials related to the process for selecting a COPA Chief Administrator should a vacancy occur, including a PowerPoint presentation for new CCPSA members to ensure that the selection process and criteria are clear and draft surveys seeking responses from CPD and COPA personnel regarding the qualities needed of a COPA Chief Administrator.

To assess Full compliance this reporting period, the IMT reviewed documentation related to the CCPSA's search and selection of a new COPA Chief Administrator, including community outreach efforts and selection criteria. The documentation demonstrated that the CCPSA has sufficiently implemented its policies and training such that it follows the set method in selecting the Chief Administrator of COPA.

Moving forward, we will look for evidence of continued compliance from the CCPSA to maintain Full compliance.

¹⁷ Years after the Consent Decree took effect, the City of Chicago created the Community Commission for Public Safety and Accountability (CCPSA); the CCPSA's municipal ordinance requires the CCPSA to perform the requirements of ¶525.

Paragraph 525 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: Preliminary	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: 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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶527

527. *Within 180 days of the Effective Date, COPA and BIA will begin providing all investigation staff members with at least eight hours of annual, comprehensive, in-service training.*

Compliance Progress (Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:		<i>In Compliance (NINTH REPORTING PERIOD)</i> ¹⁸
	CPD	<i>In Compliance (NINTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶527, and COPA maintained Full compliance with the requirements of ¶527.

For the CPD, the CPD achieved Preliminary compliance in the ninth reporting period by finalizing its S08-01, *Complaint and Disciplinary Investigators and Investigations*, as well as BIA's *In-Service Training Plan* for 2024. Since the ninth reporting period, the CPD has continued to develop training materials related to BIA's *In-Service Training Plan*, as well as a new training plan each year that addresses the topics required by ¶528. The CPD achieved Secondary compliance in the eleventh reporting period by developing and delivering eight hours of comprehensive in-service training.

To assess Full compliance this reporting period, the IMT reviewed BIA's 2025 in-service training records and training evaluations. The IMT previously reviewed BIA's 2026 *In-Service Training Plan* and BIA's 2023 and 2024 in-service training records in the thirteenth reporting period. Together, these documents demonstrate that the CPD has appropriate training and systems in place to ensure all investigative staff members receive at least eight hours of annual, comprehensive, in-service training, as required by this paragraph.

¹⁸ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

For COPA, COPA achieved Preliminary compliance in the third reporting period by finalizing its *Training Plan*. COPA achieved Secondary compliance in the fifth reporting period by providing in-service training attendance records. COPA achieved Full compliance by providing records that tracked the provision and completion of in-service training to and by COPA employees. COPA demonstrated that it had the necessary systems in place to meet the requirements of ¶527 by developing and delivering annual, comprehensive in-service training, while maintaining detailed and clear records to keep track of personnel training history. Since COPA achieved Full compliance in the fifth reporting period, COPA has continued to provide training records of COPA in-service trainings. Additionally, COPA continues to provide opportunities to the IMT and the OAG for training observations.

To maintain Full compliance this reporting period, the IMT reviewed COPA's 2026 *Training Plan*, training records, and training evaluations. The IMT also reviewed COPA's analysis of the training evaluations, which included proposed actions to improve future trainings where appropriate.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its S08-01, *Complaint and Disciplinary Investigators and Investigations* policy, and its *BIA In-Service Training* modules to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its in-service trainings to maintain Full compliance.

Paragraph 527 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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶528

528. *The initial and annual in-service training for COPA and BIA investigators will include instruction in: a. how to properly handle complaint intake, and the consequences for failing to take complaints; b. best practices in procedural justice, including techniques for communicating with complainants and members of the public; c. the collection of objective verifiable evidence; d. the process for seeking an override affidavit in the absence of a signed complainant affidavit; e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct; f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct; g. investigative skills, including proper interrogation and interview techniques, gathering and objectively analyzing evidence, and data and case management; h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation; i. properly weighing the credibility of witnesses against CPD members; j. using objective evidence to identify and resolve inconsistent statements; k. implicit bias; l. the proper application of the relevant standards of proof; m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement; n. relevant state and federal law; o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22; p. the CMS; q. the applicable collective bargaining agreements; and r. how to access and use the PRS or information available on the PRS.*

Compliance Progress		(Reporting Period: January 1, 2026, through June 30, 2026)
Preliminary:		<i>In Compliance (TENTH REPORTING PERIOD)</i> ¹⁹
	CPD	<i>In Compliance (TENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SECOND REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>
Full:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (TENTH REPORTING PERIOD)</i>

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶528, and COPA maintained Full compliance with the requirements of ¶528.

¹⁹ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

For the CPD, before the fourteenth reporting period, the CPD finalized its S08-01, *Complaint and Disciplinary Investigators and Investigations* policy in the ninth reporting period, which addressed the requirements of this paragraph. The CPD achieved Preliminary compliance in the tenth reporting period by developing and receiving no-objection notices for modules of instruction for each subparagraph of ¶528 (see below chart), together with its S08-01 policy. The CPD achieved Secondary compliance in the eleventh reporting period by providing documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 *BIA In-Service Training*. By completing the 2024 *BIA In-Service Training*, the CPD has trained on each relevant subparagraph of ¶528.

To assess Full compliance this reporting period, the IMT reviewed BIA's 2025 in-service training records and training evaluations. The IMT previously reviewed BIA's *In-Service Training Plan*, BIA's *Onboard Training Plan*, and prior in-service and onboard training records. The IMT and the Office of the Illinois Attorney General (OAG) have also been provided opportunities in prior reporting periods to observe multiple CPD trainings related to its in-service and onboarding trainings, relevant to ¶528.

For COPA, COPA achieved Preliminary compliance in the second reporting period by finalizing its *Training and Professional Development Plan*. COPA achieved Secondary compliance in the ninth reporting period by developing and receiving no-objection notices for training curriculum relevant to each subparagraph of ¶528. COPA achieved Full compliance in the tenth reporting period by continuing to update and provide training to its members on each subparagraph of ¶528, as well as providing course and instructor evaluation records. Since COPA achieved Full compliance in the tenth reporting period, COPA has continued to provide training records of COPA in-service trainings. Additionally, COPA continues to provide opportunities to the IMT and the OAG for training observations.

To maintain Full compliance this reporting period, the IMT reviewed COPA's 2026 *Training Plan*, training records, and training evaluations. The IMT also reviewed COPA's analysis of the training evaluations, which included proposed actions to improve future trainings where appropriate. The IMT and the OAG have been provided opportunities to observe COPA training sessions for multiple years now.

The below chart indicates which CPD and COPA trainings have been approved for each subparagraph and when each training was initially delivered.

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
a. how to properly handle complaint intake, and the consequences for failing to take complaints	<i>BIA In-Service Training: Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9) <i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (delivered in IMR14) <i>BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides</i> (delivered in IMR14)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)
b. best practices in procedural justice, including techniques for communicating with complainants and members of the public	<i>BIA In-Service Training: Sexual Misconduct Initiation</i> (delivered in IMR9) <i>BIA In-Service Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9) <i>BIA In-Service Training: Collection of Evidence and Interviews with Non-Department Members</i> (delivered in IMR11) <i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR14) <i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (delivered in IMR14) <i>BIA Onboard Training: Evidence and Non-Department Member Interviews</i> (delivered in IMR14) <i>BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization</i> (delivered in IMR14) <i>BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR14)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5) <i>Procedural Justice</i> (delivered in IMR4)
c. the collection of objective verifiable evidence	<i>BIA In-Service Training: Collection of Evidence and Interviews with Non-Department Members</i> (delivered in IMR11) <i>BIA Onboard Training: Evidence and Non-Department Member Interviews</i> (delivered in IMR14) <i>BIA In-Service Training eLearning Module: Objective Verifiable Evidence</i> (delivered in IMR14)	<i>Fact Gathering-Evidence Collection</i> (delivered in IMR7)
d. the process for seeking an override affidavit in the absence of a signed complainant affidavit	<i>BIA In-Service Training: Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9) <i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (delivered in IMR14) <i>BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides</i> (delivered in IMR14)	<i>Complaint Register</i> (delivered in IMR8)

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct	Not Applicable	<i>Forensic Experiential Trauma Interviews (FETI) Training</i> (delivered in the sixth reporting period) <i>Sexual Misconduct & Domestic Violence</i> (delivered in the ninth reporting period)
f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct	<i>BIA In-Service Training: Sexual Misconduct Initiation</i> (delivered in the ninth reporting period) <i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization</i> (delivered in the fourteenth reporting period)	Not Applicable
g. investigative skills, including proper interrogation and interview techniques, gathering and objectively analyzing evidence, and data and case management	<i>BIA In-Service Training: Interviewing Department Members</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Department Members Interviews</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Interviewing Department Members</i> (delivered in the fourteenth reporting period)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in the fifth reporting period) <i>Officer Interviews</i> (delivered in the seventh reporting period) <i>Fact Gathering-Evidence Collection</i> (delivered in the seventh reporting period)
h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation	<i>BIA In-Service Training: Mistakes and Updates</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Evidence and Non-Department Member Interviews</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Department Members Interviews</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Mistakes and Updates</i> (delivered in the fourteenth reporting period)	<i>Fact Gathering-Evidence Collection</i> (delivered in the seventh reporting period)
i. properly weighing the credibility of witnesses against CPD members	<i>BIA In-Service Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the fourteenth reporting period)	<i>Fact Gathering-Evidence Collection</i> (delivered in the seventh reporting period) <i>Witness Reliability Assessment in Police Misconduct Investigations</i> (delivered in the fourth reporting period)

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
j. using objective evidence to identify and resolve inconsistent statements	<i>BIA In-Service Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in eleventh reporting period) <i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the fourteenth reporting period)	<i>Officer Interviews</i> (delivered in the seventh reporting period) <i>Fact Gathering-Evidence Collection</i> (delivered in the seventh reporting period) <i>CPD Rules and Directives</i> (delivered in the fourth reporting period)
k. implicit bias	<i>BIA In-Service Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the eleventh reporting period) <i>BIA In-Service Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in the ninth reporting period) <i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in the fourteenth reporting period)	<i>Implicit Bias Training</i> (delivered in the fourth reporting period)
l. the proper application of the relevant standards of proof	<i>BIA In-Service Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the fourteenth reporting period)	<i>Final Summary Reports & Standards of Proof</i> (delivered in the seventh reporting period)
m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement	<i>BIA In-Service Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9) <i>BIA In-Service Training: Mistakes and Updates</i> (delivered in the eleventh reporting period) <i>BIA In-Service Training: Investigation Assignment and Timelines</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Rules and Regulations</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in the fourteenth reporting period)	<i>Consent Decree Overview</i> (delivered in the third reporting period) <i>CPD Rules and Directives</i> (delivered in the fourth reporting period)

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
	<i>BIA Onboard Training: Consent Decree and Law Review</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS)</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Mistakes and Updates</i> (delivered in the fourteenth reporting period)	
n. relevant state and federal law	<i>BIA In-Service Training: Sexual Misconduct Initiation</i> (delivered in the ninth reporting period) <i>BIA In-Service Training: Consent Decree and Law Review</i> (delivered in the ninth reporting period) <i>BIA In-Service Training: Mistakes and Updates</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Consent Decree and Law Review</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Consent Decree and Law Review</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Mistakes and Updates</i> (delivered in the fourteenth reporting period)	<i>Fourth Amendment: Vehicle Stops & Searches</i> (delivered in the ninth reporting period) <i>Compelled Statements</i> (delivered in the ninth reporting period)

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22	<i>BIA In-Service Training: Complaint Initiation and Affidavit Overrides</i> (delivered in the ninth reporting period) <i>BIA In-Service Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Rules and Regulations</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (delivered in the fourteenth reporting period) <i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides</i> (delivered in the fourteenth reporting period)	<i>CPD Rules and Directives</i> (delivered in the fourth reporting period)
p. the CMS	<i>BIA In-Service Training: Complaint Management System and Complete Investigatory Files</i> (delivered in the ninth reporting period) <i>BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS)</i> (delivered in the fourteenth reporting period) <i>BIA In-Service Training eLearning Module: Complete Investigatory Files and Case Management System</i> (delivered in the fourteenth reporting period)	<i>Case Management System: Overview of Policy and Procedures</i> (delivered in the sixth reporting period)
q. the applicable collective bargaining agreements	<i>BIA In-Service Training: Audio Recording Interview Guidelines</i> (delivered in the eleventh reporting period) <i>BIA Onboard Training: Department Members Interviews</i> (delivered in the fourteenth reporting period)	<i>Collective Bargaining Agreement Training</i> (delivered in the third reporting period)
r. how to access and use the PRS or information available on the PRS	<i>BIA In-Service Training: SharePoint, SPARS & Performance Recognition System</i> (delivered in the ninth reporting period) <i>BIA Onboard Training: Optimizing Computer Functions</i> (delivered in the thirteenth reporting period) <i>BIA In-Service Training eLearning Module: Optimizing Resources and Computer Function</i> (delivered in the fourteenth reporting period)	Not Applicable

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

S08-01, *Complaint and Disciplinary Investigators and Investigations* policy, its *BIA In-Service Training* modules, and its *BIA Onboard Training* modules to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule and for COPA to periodically review and revise its relevant trainings to maintain Full compliance.

Paragraph 528 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: 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: 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶529

529. *Within 180 days of the Effective Date, CPD will begin providing training to all CPD members on the terms of this Agreement and COPA's and CPD's revised or new policies related to administrative investigations and discipline. To the extent appropriate and necessary based upon a CPD member's duties, and contact with members of the public and/or individuals in custody, this training will include instruction on: a. identifying and reporting misconduct, the consequences for failing to report misconduct, and the consequences for retaliating against a person for reporting misconduct or participating in an investigation; b. use of the City's anonymous reporting website; c. for CPD supervisors: i. the proper initiation of the intake process, including providing COPA's contact information and the consequences for failing to initiate the intake process; and ii. techniques for turning the initiation of a complaint into a positive police-community member interaction.*

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Preliminary:	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
Full:	<i>Under Assessment</i>

In the fourteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶529 and are under assessment for Full compliance.

Before the fourteenth reporting period, the CPD achieved Preliminary compliance in the eleventh reporting period by finalizing its G08-01, *Complaint and Disciplinary System*. Regarding Secondary compliance, in the eleventh reporting period, the CPD provided documentation demonstrating that more than 95% of all CPD members had taken and passed the *Consent Decree eLearning* but did not submit the training curriculum for review.

To assess Secondary and Full compliance this reporting period, the IMT reviewed the CPD's revised *Consent Decree eLearning*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that more than 95% of all CPD members have taken and passed the revised *Consent Decree eLearning*.

Paragraph 529 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: 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: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Preliminary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

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, 2026, through June 30, 2026)
Preliminary:		<i>In Compliance</i> (NINTH REPORTING PERIOD) ²⁰
	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>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (TWELFTH REPORTING PERIOD)

In the fourteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶530, and COPA maintained Full compliance with the requirements of ¶530.

For the CPD, before the fourteenth reporting period, the CPD achieved Preliminary compliance in the ninth reporting period by finalizing its S08-01, *Complaint and Disciplinary Investigators and Investigations*, and by providing BIA’s 2024 *In-Service Training Plan* and BIA’s 2024 *Onboard Training Plan*. The CPD achieved Secondary compliance in the eleventh reporting period by providing and receiving no-objection notices for BIA’s 2025 *In-Service Training Plan* and BIA’s 2025 *Onboard Training Plan*.

To assess Full compliance this reporting period, the IMT reviewed BIA’s 2025 in-service training records and training evaluations. The IMT previously reviewed BIA’s *In-Service Training Plan*, BIA’s *Onboard Training Plan*, and prior in-service and onboard training records. Together, these documents demonstrate that the CPD has implemented its onboard and in-service training plans, as required by this paragraph.

For COPA, before the fourteenth reporting period, COPA achieved Preliminary and Secondary compliance in the third reporting period by providing and revising its *Training and Professional Development Department Training Plan* and developing

²⁰ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

initial and in-service training courses in accordance with the plan. COPA achieved Full compliance in the twelfth reporting period by providing its *2025-2026 Training Plan*, training records, and training evaluation records. Additionally, COPA provided its *Faculty Development Framework*, which expands and supplements prior documentation that explains how training and lesson plans are developed, how training instructors are selected and developed, and the process for evaluation of training courses and instructors. Since the twelfth reporting period, COPA continued to provide updated training plans, training records, training evaluations, and training observation opportunities.

To maintain Full compliance this reporting period, the IMT reviewed COPA's *2026 Training Plan*, training records, and training evaluations. The IMT also reviewed COPA's analysis of the training evaluations, which included proposed actions to improve future trainings where appropriate. The IMT and the OAG have been provided opportunities to observe COPA training sessions for multiple years now.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise its S08-01 policy, *Complaint and Disciplinary Investigators and Investigations*, to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the agreed-upon staggered production schedule 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
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶545

545. To the extent permissible by law, within 60 days of its implementation, each CPD policy and directive, including those created pursuant to this Agreement, will be posted online and otherwise made publicly available. Any exception will be limited to documents that must remain confidential to protect public safety, and as approved by the Superintendent.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

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

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶545.

To assess Preliminary compliance this reporting period, the IMT reviewed the CPD's G01-03, *Department Directives System*, and S01-03, *Review of Department Directives*, which together address the requirements of ¶545. The IMT and the Office of the Illinois Attorney General (OAG) provided no-objection notices. G01-03 outlines the process for the Superintendent exempting general directives from being made publicly available to protect public safety.

The IMT notes, however, that there continues to be disagreement on whether ¶545 requires the CPD to follow this same process for unit-level directives. S01-03 requires the creation and continuous review and management of a complete listing of current and active unit-level directives. We believe that this is a critical step in the right direction that will better allow the City, the CPD, the OAG, and the IMT to resolve any outstanding disagreements regarding unit-level directives moving forward.

Moving forward, we will look for the CPD to post its G01-03 and S01-03 policies for public comment and to develop and provide training covering the requirements of this paragraph.

Paragraph 545 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: 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: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: None	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Preliminary	

Accountability and Transparency: ¶546

546. 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 CPD activity during the previous calendar year (“CPD Annual Report”). The purpose of the CPD Annual Report will be to inform the public of the City’s law enforcement achievements and challenges, as well as new programs and steps taken to address challenges and build on successes. The CPD Annual Report will further provide information regarding the City’s implementation and status of this Agreement. The CPD Annual Report will not include any specific information or data by law that may not be disclosed. Subject to applicable law, the CPD Annual Report will provide data and program updates analyzing: a. community engagement and problem-solving policing efforts, identifying successes, challenges, and recommendations for future improvement; b. stop, search, and arrest data and any analysis of that data that was undertaken; c. use-of-force data and associated analyses; d. CPD responses to requests for service from individuals in crisis; e. initiatives that CPD has implemented for officer assistance and support; f. recruitment efforts, challenges, and successes; and g. in-service and supplemental recruit training.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Recurring Schedule: Annually



Met



Missed

Preliminary: *In Compliance (THIRTEENTH REPORTING PERIOD)*

Secondary: *In Compliance (THIRTEENTH REPORTING PERIOD)*

Full: *Under Assessment*

In the fourteenth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance with the requirements of ¶546.

Before the fourteenth reporting period, the City and the CPD achieved Preliminary compliance by finalizing the CPD’s Special Order S09-05-02, *Department Publication*. The policy outlines requirements for the CPD’s annual report, including use of force trends as required by ¶547. Additionally, the policy requires the publication of the annual report and sets out the contents that must be included in the annual report in accordance with the requirements of the Consent Decree. The CPD achieved Secondary compliance by providing CPD’s *2024 Annual Report* and *2024 Annual Use of Force Report*.

To assess Full compliance, the IMT reviewed the CPD’s *2025 Annual Report* and *2025 Annual Use of Force Report*. With respect to ¶546(c), the CPD’s *2025 Annual Report* incorporates by reference the CPD’s *2025 Annual Use of Force Report*. The *2025 Annual Use of Force Report*, however, analyzes use-of-force data for the first three quarters of 2025 and does not analyze the fourth quarter of 2025 due to higher priorities. We understand that the Tactical Review and Evaluation Division (TRED) is still conducting this analysis and it will be available in a future report. The

IMT notes that data for a quarter of the year may impact significant use of force trends, and therefore, the City and the CPD are under assessment for Full compliance.

Moving forward, we will look for the CPD to complete its analysis of the remaining 2025 data and to report on it in a future report.

Paragraph 546 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: 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: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Accountability and Transparency: ¶547

547. CPD will regularly analyze the information it collects regarding reportable uses of force to identify significant trends. CPD will include information about any such trends in the CPD Annual Report.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Recurring Schedule: Annually



Met



Missed

Preliminary: *In Compliance (THIRTEENTH REPORTING PERIOD)*

Secondary: *In Compliance (THIRTEENTH REPORTING PERIOD)*

Full: *Under Assessment*

In the fourteenth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance with the requirements of ¶547.

Before the fourteenth reporting period, the City and the CPD achieved Preliminary compliance by finalizing the CPD's Special Order S09-05-02, *Department Publication*. The policy outlines requirements for the CPD's annual report, including use of force trends as required by ¶547. The CPD achieved Secondary compliance by providing CPD's *2024 Annual Report* and *2024 Annual Use of Force Report*.

To assess Full compliance, the IMT reviewed the CPD's *2025 Annual Report* and *2025 Annual Use of Force Report*. The CPD's *2025 Annual Report* incorporates by reference the CPD's *2025 Annual Use of Force Report*. The *2025 Annual Use of Force Report*, however, analyzes only use of force data for the first three quarters of 2025 and does not analyze the fourth quarter of 2025 due to higher priorities. We understand that the Tactical Review and Evaluation Division (TRED) is still conducting this analysis and it will be available in a future TRED report. The IMT notes that data for a quarter of the year may impact significant use of force trends, and therefore, the City and the CPD are under assessment for Full compliance.

Moving forward, we will look for the CPD to complete its analysis of the remaining 2025 data and to report on it in a future report.

Paragraph 547 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:
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:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

FOURTEENTH REPORTING PERIOD
JANUARY 1, 2026 – JUNE 30, 2026

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 Tort’s 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, 2026, through June 30, 2026)

Recurring Schedule: Annually



Met



Missed

Preliminary: *In Compliance* (TENTH REPORTING PERIOD)

Secondary: *In Compliance* (TWELFTH REPORTING PERIOD)

Full: *In Compliance* (NEW)

In the fourteenth reporting period, the City achieved Full compliance with the requirements of ¶548.

Before the fourteenth reporting period, the City achieved Preliminary compliance by publishing its *2023 Report on Chicago Police Department Litigation* within 180 days following the end of the 2023 calendar year, along with a spreadsheet containing relevant data (see ¶548(b)). The City achieved Secondary compliance by timely publishing its *2024 Litigation Report*, which appropriately addressed the requirements of ¶548.

To assess Full compliance, the IMT reviewed the City's *2025 Annual Litigation Report*.²¹ The City timely published its *2025 Annual Litigation Report*, and 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.

Moving forward, we will look for the City to continue to timely submit its annual litigation report and that the annual litigation report continues to meet the requirements of this paragraph to maintain Full compliance. During the sustainment period, the City will also need to comply with ¶549.

²¹ The City's *2025 Annual Litigation Report* is available on its website at: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html#docaccess-7a785e18923a51bec3a4a12e44bc6d0a.

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

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

FOURTEENTH REPORTING PERIOD
JANUARY 1, 2026 – JUNE 30, 2026

COMPLIANCE PROGRESS:
Full

Accountability and Transparency: ¶549

549. As part of the CPD Annual Litigation Report, the City will analyze the data and trends collected, and include a risk analysis and resulting recommendations.

Compliance Progress

(Reporting Period: January 1, 2026, through June 30, 2026)

Recurring Schedule: Annually



Met



Missed

Preliminary: *In Compliance (TENTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

In the fourteenth reporting period, the City maintained Preliminary compliance with the requirements of ¶549.

To assess Secondary compliance, the IMT reviewed the City's *2025 Annual Litigation Report*.²² The 2025 report includes a trend and risk analysis, but like prior litigation reports, the risk assessment of resolved cases is not sufficiently robust to support meaningful discussions to improve CPD policy, leadership, supervision, or training of department members.

Additionally, the IMT is concerned that the City appears to be taking the position that it cannot publish any resulting recommendations, as required by this paragraph, due to the attorney-client privilege and attorney work product privilege (see *2025 Annual Litigation Report*, p. 23). If the City continues to take the position that any resulting recommendations cannot be published in the report, the City will be at risk of losing compliance with ¶549 in future reporting periods. We look forward to discussions with the City about this issue.

Moving forward, for Secondary compliance, we will determine whether the City has allocated sufficient resources to analyze the data and trends collected and to include a risk analysis and resulting recommendations, as required by this paragraph.

²² The City's *2025 Annual Litigation Report* is available on its website at: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html#docaccess-7a785e18923a51bec3a4a12e44bc6d0a.

Paragraph 549 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:
Preliminary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Preliminary

FOURTEENTH REPORTING PERIOD
JANUARY 1, 2026 – JUNE 30, 2026

COMPLIANCE PROGRESS:
Preliminary