

2024

Audits of Complaints Against the Philadelphia Police Department

**A REVIEW OF AUDITS OF THE
PHILADELPHIA POLICE DEPARTMENT'S
INTERNAL AFFAIRS INVESTIGATIONS
COMPLETED IN 2024**

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Executive Summary

The legislation authorizing the Citizens Police Oversight Commission (CPOC) was signed in 2021, and since then, CPOC has been working to fulfill its mission to conduct oversight of the Philadelphia Police Department (PPD) and to increase transparency and accountability. When a person alleges that officers have engaged in misconduct, they can file a complaint against police (CAPs) to hold the officer(s) accountable. Those complaints are currently investigated by a group of PPD sergeants and lieutenants who work in the PPD's Internal Affairs Division (IAD). CPOC developed an auditing process through which CPOC can systemically review and assess IAD investigations for thoroughness, completeness, and objectivity.

In 2024, CPOC's audits showed that some components of IAD's investigations are going well. These include proper identification of the accused officer(s), generally unbiased writing in reports of investigation, and obtaining video evidence within retention periods, among others. Areas for improvement include identifying missed allegations of misconduct in the investigative policies to ensure consistency across cases. CPOC has included several recommendations that pinpoint specific opportunities for improvement in this report.

This report focuses on 357 cases audited by CPOC staff in 2024. In July of 2024, CPOC's auditing process changed significantly when CPOC and IAD leadership collaborated

to develop a "live audit" process. In this new process, IAD sends the full case file for a completed investigation to CPOC for review. Previously, IAD sent only the final report of investigation (PC memo), not the full case file, and sent it only after the case had finished working through the disciplinary process, which did not allow for any feedback to be incorporated.

The new live audit program allows CPOC to have more direct oversight of the CAP investigation process because CPOC staff can make recommendations for changes to an investigation before it is closed. This is an unprecedented process in Philadelphia. As live audits have continued, CPOC has observed various changes to IAD investigations and practices that are responsive to recommendations that CPOC made. Investigators and supervisors have taken steps to bring additional clarity and consistency across investigations.

The reviews detailed in this report resulted in CPOC making 7 concrete policy recommendations to further improve the consistency of IAD CAP investigations. The goal of these recommendations is to standardize investigations where possible, to ensure fairness for both complainants and officers alike. CPOC looks forward to working with IAD where possible to develop policies that are responsive to these recommendations.



Background on Complaints Against Police

Complaints made by residents against PPD officers are called Complaints Against Police (CAPs). CAPs are currently investigated solely by Internal Affairs (IAD), which is a unit of PPD, comprised of investigators who are sworn PPD personnel who are supervisors. In addition to CAP investigations, IAD personnel are also responsible for completing investigations that may originate from members of the department or detail allegations of corruption or serious police misconduct; these cases are referred to as Internal investigations. Every month, IAD forwards CPOC recently completed CAP investigations. CPOC does not receive internal investigations.¹

CPOC receives a Police Commissioner memo (PC memo) from PPD for each completed investigation. A PC memo is a comprehensive report that details the investigative process and outcome of each Complaint Against Police. PC memos are comprised of descriptions of the initial complaint, all investigative steps taken, interview summaries, summaries of relevant documentation, and the investigation's conclusions. Starting in July 2024, CPOC began receiving the full case file to review along with the PC memos (discussed in more detail below in the section titled "live audits").

The outcome of each investigation is critical. If the investigator did not sustain any allegations against an officer, the process ends. If any allegations were sustained through the investigation, the case moves through the Police Board of Inquiry (PBI) discipline process, including the Charging Unit and a PBI Hearing when necessary. CPOC reviews CAP cases with sustained misconduct during the discipline charging process and also sits on the hearing panels at PBI hearings.

CPOC's audits of IAD misconduct investigations provide an effective oversight tool, which helps improve the accountability functions that are already in place at PPD. These audits are distinct from independent investigations, which CPOC is tasked with performing by city ordinance, Phila. City Code § 21-1205 but is not yet able to do because of barriers with the police contracting process

¹Internal investigations are defined in PPD Office of Professional Responsibility (OPR) Policy #10 as "complaints originating from a source other than a citizen or citizens' group; any allegation of corruption or serious police misconduct received; but not limited to:

- Requests or information received by anonymous sources or by Police Department personnel alleging corruption, misconduct, or departmental violations.
- Information alleging police misconduct received from other law enforcement or criminal justice agencies, e.g. FBI, District Attorney's Office, other police departments, etc.
- Anonymous information alleging corruption, misconduct, or departmental violations."



Methodology and Limitations

CPOC developed a process for auditing IAD investigations into CAPs following best practices from other federal and municipal government oversight bodies. CPOC developed standard criteria and questions to aid in reviews of PC memos to ensure consistency in CPOC's audits and information collection. The audits record quantitative aspects of investigations, such as whether investigations were completed within 90 days, as well as more qualitative standards, such as whether the findings matched the evidence presented in the PC memo. The standards were developed using PPD's Office of Professional Responsibility (OPR) policies, standards for peer review of closed cases developed by the Council of Inspectors General on Integrity and Efficiency, and a similar auditing tool used by the Chicago Office of the Inspector General (Appendix 1 and 2). For more in-depth information about CPOC's auditing process, please read the CPOC Auditing Manual (Appendix 3).

The auditing team systematically evaluates the investigation described in each PC memo for quality, thoroughness, and objectivity. Auditors provide nuanced investigative critiques and highlight anything that may have affected investigative outcomes, such as missing allegations against an officer or discrepancies between the evidence presented and the investigation's conclusion. The audits are broken into five sections: Timeliness, Professional Standards of Care, Evidence Collection and Analysis, Interviews, and Conclusions & Case Disposition. For the full list of auditing questions, please see Appendix 4.

Live Audits

CPOC's recommendations related to civilian contacts were related to an IAD policy that requires a minimum number of contact attempts to a complainant before an investigator can close a case as "complainant uncooperative". CPOC was misinterpreting this policy to apply to all investigations, and so this recommendation was not grounded in IAD policy. This is discussed further in section II of this report.

CPOC organized two feedback meetings with IAD investigators in April and May of 2025. After obtaining feedback from IAD investigators about the live audit process, CPOC has been assessing the workflow in place for this process to determine if CPOC can raise concerns about an investigation in a more streamlined way. The live audit process has been a great opportunity for collaboration between CPOC and PPD and has allowed for the oversight perspective to be included in misconduct investigations in a new way. The conversations between CPOC and PPD related to the auditing process have been productive, and CPOC looks forward to continuing these conversations to improve processes and increase accountability.

Limitations

When CPOC was auditing only the PC memos of closed and finalized investigations in the first 6 months of 2024, CPOC received an average of 30 cases a month. At that time, CPOC staff was able to audit all cases we received. The audits of those cases were not time-sensitive, staff could complete their audits whenever possible, and each audit involved reviewing far less material.

Due to the high volume of investigations completed at IAD, the discipline timeline, and CPOC staffing limitations, CPOC cannot complete a live audit of every investigation received. CPOC has an 11-business day deadline for completing live audits, to ensure that CPOC's review process does not unduly delay the closure of the investigation. The varying number of investigations which are completed and sent to CPOC on any given day makes it impossible to review every case. Live audits can be time consuming, particularly when there are many officers involved and hours of body-worn camera footage to review. CPOC continues to make efforts to complete as many live audits as possible.

CPOC currently strives to review between 60-80 (%) of live audits. If CPOC's budget increases and more staff can be hired in the APR division the goal would be to conduct 100% of live audits.²

Note: *All of the data obtained for this report was collected from CAP investigations or investigations that began with a civilian complaint against police. CPOC does not audit internal investigations completed by IAD and thus cannot report on any information regarding those investigations.*

² CPOC's 2025 and 2026 budgets remained flat despite requests for an increase to the department's budget

Audit Results: Case Data

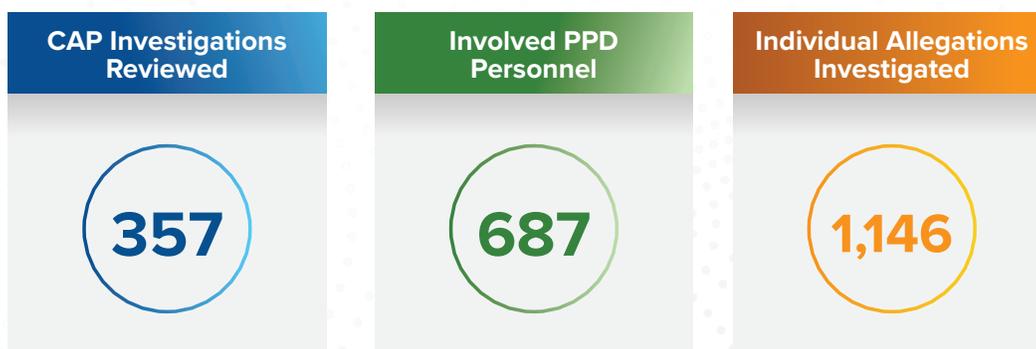
This section includes some of the case data related to the audits CPOC conducted in 2024, including high-level data summaries and information about the complaints and investigations reviewed. Additional data related to the more in-depth qualitative assessments made of these investigations is included in the next section of the report (section II. Qualitative Assessment Data).

In 2024, CPOC audited a total of 357 investigations. These investigations involved a total 687 members of PPD who were accused of a total of 1,146 allegations of misconduct. CPOC audited only investigations into complaints made by members of the public and did not audit internal investigations.

Note: Many of these investigations included more than one officer and resulted in multiple allegations of misconduct against one or more officers within the investigation.

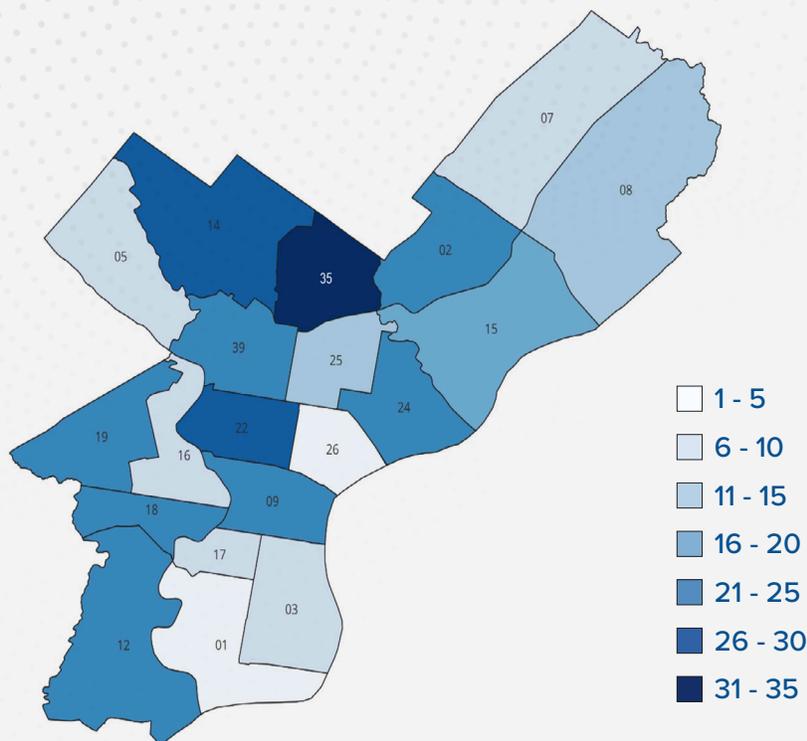
CAP AUDITING AT A GLANCE

For CAP investigations received at CPOC in 2024.

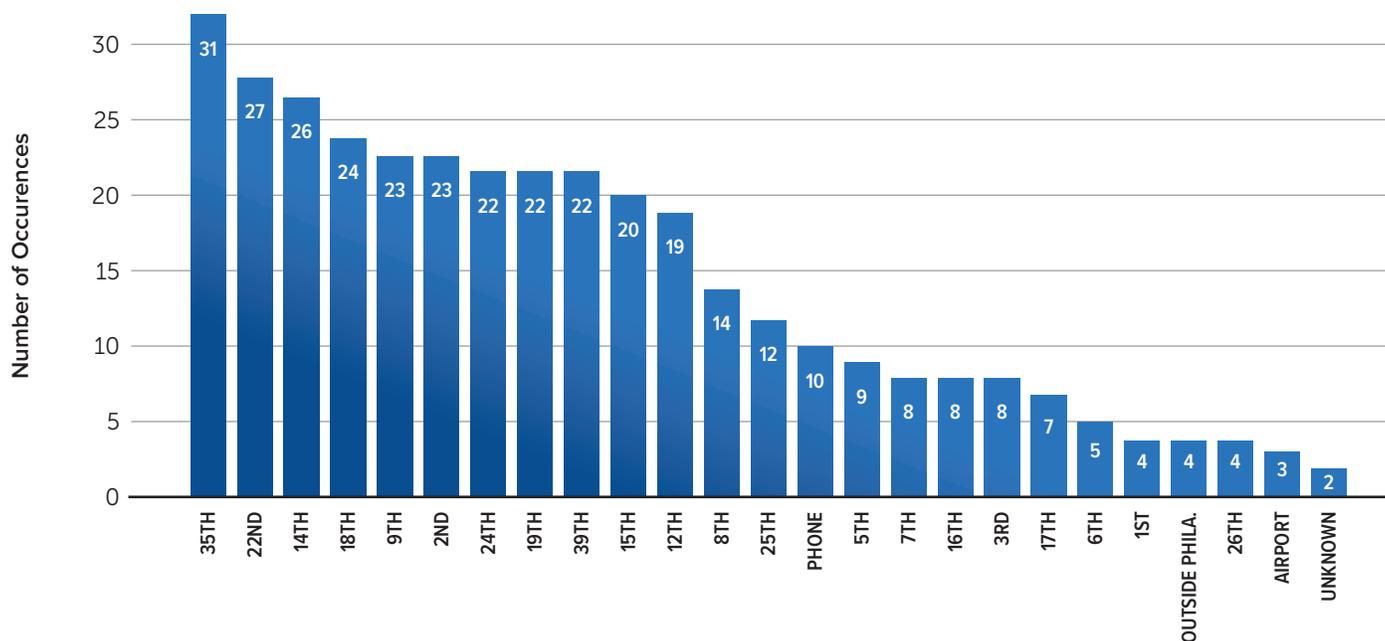


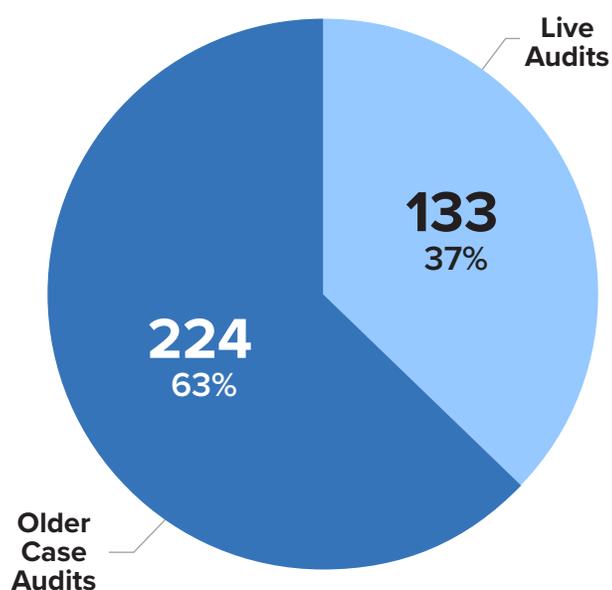
**IAD also conducts internal investigations, which arise from supervisors reporting misconduct, administrative issues, or conflicts between officers. CPOC does not audit internal investigations.*

During audits, CPOC collects various data points about the incidents that led to complaints being filed. CPOC remains interested in tracking the district of occurrence for these encounters. The following graphics show the same data represented two ways – the district of occurrence for all investigations audited shown on a map as well as a bar chart. The darker districts on the map had the highest numbers of complaint investigations audited by CPOC.

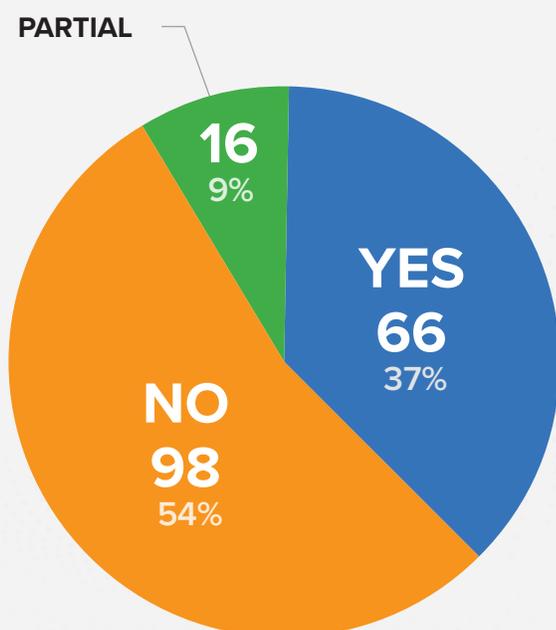


DISTRICT OF OCCURRENCE





Of the 357 cases reviewed, 133 of them were live audits, which allowed for CPOC to make recommendations to PPD about these individual cases before they were finalized. The remaining 224 cases were older cases that had already worked through the full PPD disciplinary process. These reviews were valuable for data collection and identifying possible gaps in IAD processes, but CPOC was not able to impact those cases because they were already finalized at the time of our review.



DID IAD ACCEPT CPOC'S RECOMMENDATIONS?

As a result of the 133 live audits done starting in July 2024, CPOC made a total of 238 recommendations. As part of the live audit process, investigators respond to the recommendations made by CPOC, and then it is submitted through their chain of command for the final decision on whether the case should be updated to account for CPOC's recommendations. IAD fully accepted 66 recommendations, partially accepted 16, and disagreed with 98.

When investigators disagree with a recommendation, they provide an explanation. For example, in some cases many officers are present during an incident with a complainant. Investigators must decide who to interview – if 20 officers were there, it may not be necessary to interview all 20. If there is no explanation as to why certain officers were not interviewed, CPOC recommends that an investigator interview all officers present or provide an explanation in the PC memo noting why certain officers were not interviewed. In response, investigators will at times explain their choice in their response to CPOC but then do not update the PC memo to include that information. CPOC would consider this a rejected recommendation.

In those situations, CPOC often agrees with the choice to not interview all officers, but the explanation in the PC memo is the important part of the recommendation. The goal of that recommendation is to ensure the PC memo is a clear and thorough record of the investigation, so that any future reader can understand exactly what happened and why. That is an investigative best practice for all investigations that can be helpful if a case moves forward for discipline and must be reviewed by other police leaders, city attorneys, or an arbitrator. Notably, investigators have been including these explanations more regularly in PC memos since 2024.

CPOC made an additional 58 recommendations that had a resolution of “N/A”. In this context, N/A means CPOC made an observation related to the case or an investigative best practice and no response was required. Additionally, when CPOC first began doing live audits, CPOC sent some recommendations for divisional cases³, which were considered completed by the time CPOC received them. This meant that no additional work could be done on them, so those early recommendations were marked as “N/A”. CPOC continues to audit divisional cases and collect data on them but no longer makes recommendations for them.

When CPOC had recommendations for a case, typically there was more than one recommendation present. The average number of recommendations per case was about 2.5.

The following table shows all of the recommendations made by CPOC during the live audit process, and documents which recommendations were accepted, partially accepted, rejected, or had an outcome of “not applicable”.

The most frequent recommendation made was related to missing allegations or violations. This means that CPOC auditors reviewed the PC memo, or with live audits, the full case file, and identified additional allegations made by the complainant that were not properly resolved, or administrative violations that were present but were not addressed. The next most frequent recommendation was for the investigator to contact all civilians who were potential witnesses or victims of misconduct or provide an explanation as to why these contacts were not made. This recommendation was often rejected.

³ Complaints are resolved as divisional cases when the only allegation(s) present in the complaint relate to verbal abuse or lack of service AND the officer does not have any verbal abuse or lack of service complaints within the last two years. This allows low-level misconduct cases to be resolved quickly by an officer's direct chain of command and supervisors. Divisional cases receive a finding of “complete”.

Recommendation	Total	Accept	Partial Accept	Reject	Rejection Rate	N/A
Add missing allegations	68	18	10	24	35%	16
Contact all witnesses/make all attempts or provide explanation	39	7	1	27	69%	4
Adjust analysis/findings to match evidence	32	14	1	14	44%	3
List allegations against correct officers	15	9	0	3	20%	3
Intake/white paper	15	1	1	0	0	13
Interview all officers or provide explanation	14	4	0	9	64%	1
Check for BWC/surveillance footage	10	3	1	5	50%	1
Inaccurate summary of video	8	2	0	4	50%	2
Index/missing documents	8	0	1	3	38%	4
Adjust allegation	3	1	0	1	33%	1
Interview memos	3	2	0	0	0	1
Neighborhood survey issue	3	0	0	2	67%	1
Timeliness issue	3	0	0	0	0	3
Add explanation for inv. exceeding 90 days	2	1	0	1	50%	0
Address allegations in interviews	2	1	0	0	0	1
Formatting error/typo/missing text	2	2	0	0	0	0
Inaccurate summary of PPD interview	2	0	0	1	50%	1
Other inaccuracy in PC memo	2	0	0	2	100%	0
Clarify PPD presence on scene	1	1	0	0	0	0
Follow-up questions (PPD)	1	0	0	0	0	1
Include criminal case info	2	0	1	0	0	1
Reinterview officer	1	0	0	1	100%	0
Summarize videos	1	0	0	0	0	1
Unclear PC Memo	1	0	0	1	100%	0
Totals	238	66	16	98	41%	58

Feedback and Learning

CPOC's recommendations related to civilian contacts were related to an IAD policy that requires a minimum number of contact attempts to a complainant before an investigator can close a case as "complainant uncooperative". CPOC was misinterpreting this policy to apply to all investigations, and so this recommendation was not grounded in IAD policy. This is discussed further in section II of this report.

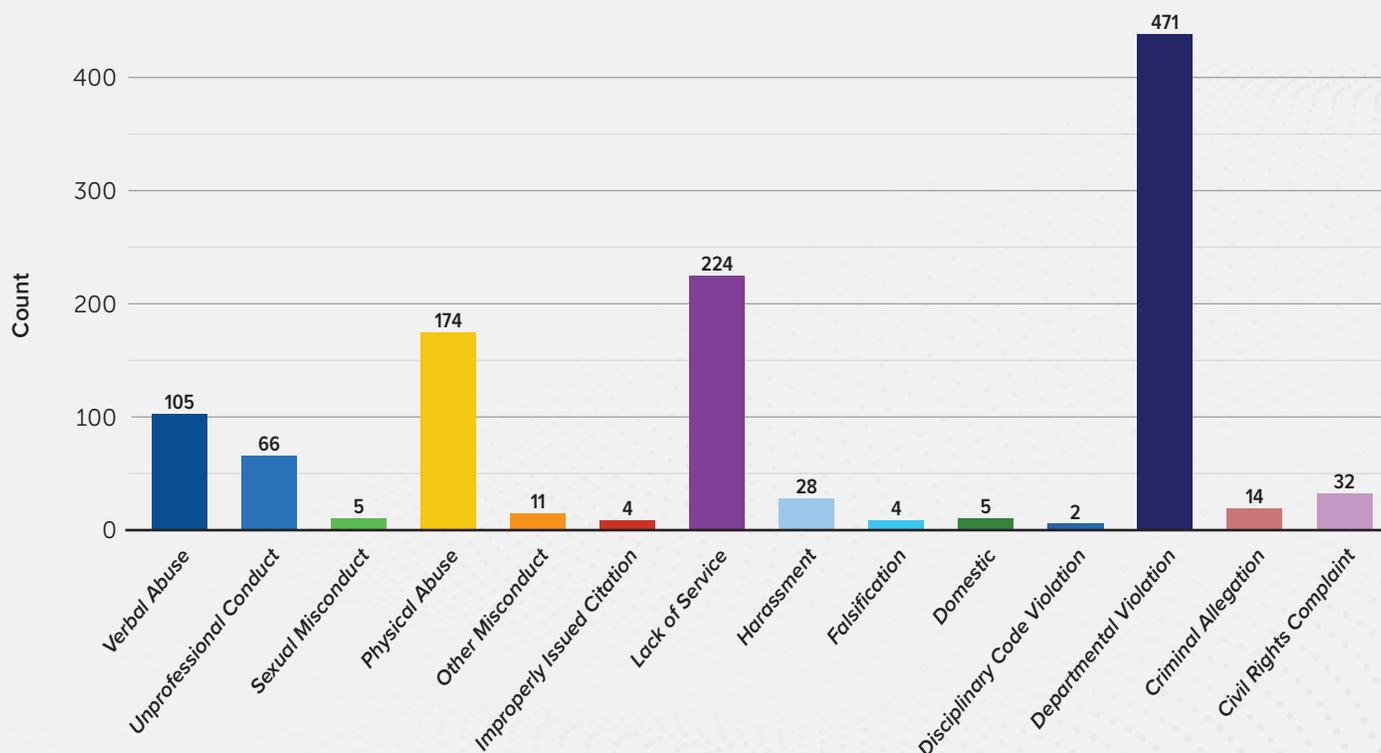
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Audit Results: Investigation Outcomes

When an IAD investigation is complete, the investigator determines which allegations to apply to the individual instances of misconduct present in the case. There can be multiple allegations in a single case, and IAD has a set list of allegations that they select from. The list of allegations is broken into categories, and each category has numerous allegations within in. For example, IAD has a category of “verbal abuse”, which contains various allegations related to specific misconduct such as “rude language/tone”, “racial slur”, “intimidating/threatening language,” and others. The following graphic shows all the allegations present in the cases reviewed during the 2024 audits conducted by CPOC. This graphic includes allegations that CPOC requested to be added during the live audit process.

Allegations from the category “departmental violations” were the most common by far. Departmental violations is a broad category that includes all violations of PPD directives as well as a wide range of allegations such as “improper search”, “refusal to provide name and badge number”, and “missing private property” among many others. The “departmental violations” category also had the highest percentage of sustained findings, meaning allegations in this category were more often found to be misconduct than other categories.

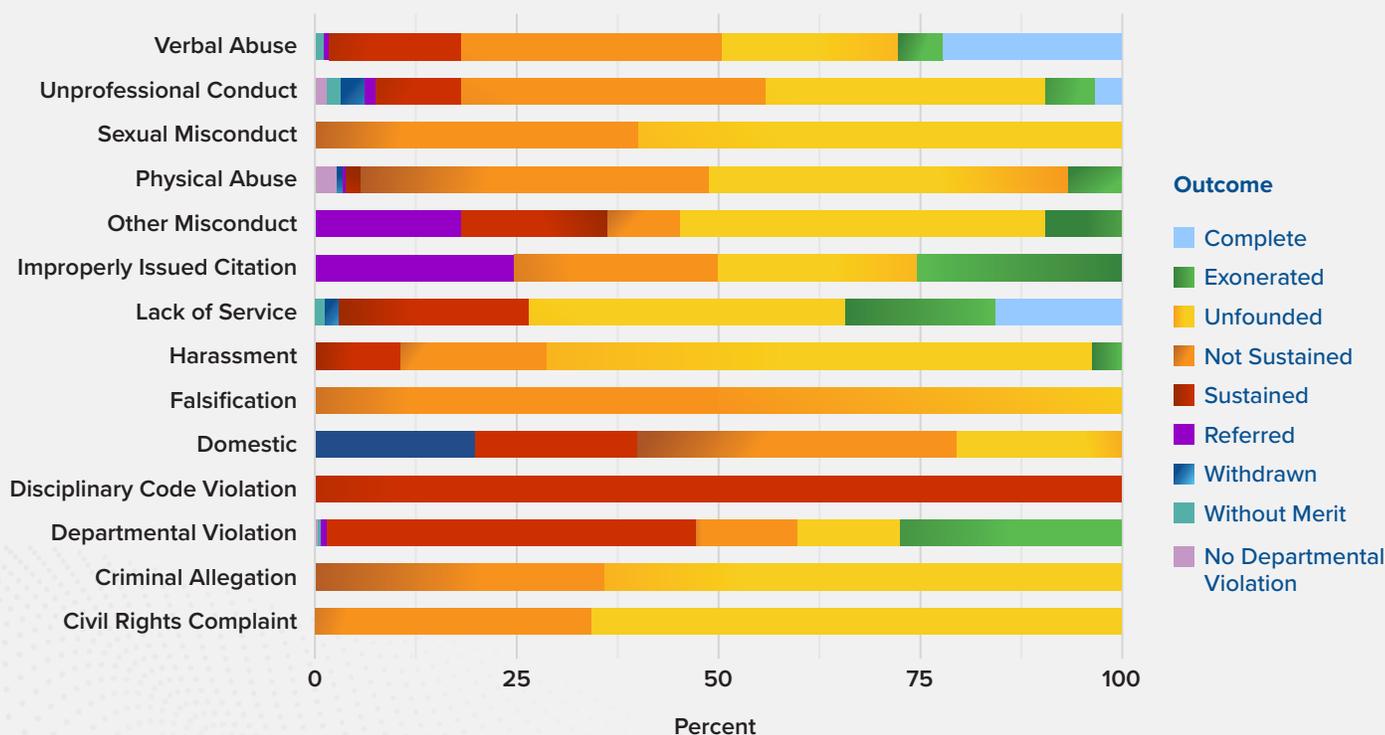
TOTAL ALLEGATIONS BY TYPE



Using the evidence collected during the investigation, the investigator determines the appropriate finding for each allegation and provides an explanation for each finding. IAD policy states investigators must address all allegations in the findings. Any allegations missed by investigators will not be considered for disciplinary action or placed on the officer's record.

The standard of proof for administrative investigations is "preponderance of the evidence." Preponderance of the evidence is met, if, considering all the evidence the allegation is more likely to have occurred than not. Preponderance of the evidence is sometimes defined as "51%," or "50% and a feather." Generally stated, this burden of proof means that it is more likely than not that the alleged incident occurred. Preponderance of the evidence is a lower threshold than beyond a reasonable doubt which serves as the burden of proof in criminal hearings. For each allegation in the complaint, the investigator is tasked with deciding the findings based on the preponderance of the evidence standard. There are several possible findings for each allegation. The most common are: "sustained," "not sustained," "unfounded," "exonerated," "withdrawn," and "complete." The full list of investigative outcomes from OPR Policy #8 is included as Appendix 5 to this report.

PPD IAD OUTCOMES BY ALLEGATION



140 cases had sustained allegations, but there were 306 individual sustained allegations. This tells us that in cases where misconduct occurred, there was often more than one sustained allegation present.

Note: This subset of data is not generalizable, and we caution readers from making broader conclusions regarding the entirety of PPD IAD investigations.

1. Sustained:

The investigation demonstrated that the incident/infraction occurred, and the action(s) alleged in the complaint were inconsistent with Departmental policy, directives, orders, and/or applicable local, state, or federal laws.

2. Not sustained:

The investigation could neither prove nor disprove whether the incident/infraction occurred.

- a. **Example:** a member of the public filed a complaint and alleged that an officer verbally abused them. The officer denied verbally abusing the complainant in their interview, and without any independent evidence—such as body camera footage or independent witness testimony—there was no way for the investigator to prove that the alleged conduct occurred. A “not sustained” outcome for an allegation of verbal abuse would be applied in this example.

3. Unfounded:

The investigation revealed that the incident/infraction did not occur.

4. Exonerated:

The investigation revealed through a preponderance of the evidence that the officer acted properly. The act(s) alleged did take place but were lawful, proper, and in accordance with Departmental policy.

- a. **Example:** a member of the public filed a complaint and alleged that an officer improperly arrested them. The investigation found that the complainant committed specific violations for which the officer arrested them, and so while the officer arrested the complainant, it was determined to be lawful. An “exonerated” outcome for an allegation of improper arrest would be applied in this example.

5. Withdrawn:

The complainant decided to withdraw their complaint of their own free will.

6. Complete:

A first complaint of Lack of Service or Verbal Abuse for an officer is closed out without an IAD investigation after a Divisional Inspector speaks to the complainant and meets with the officer to give advice, instructions, and other useful feedback regarding the complaint and the officer(s)’ actual or perceived behavior, demeanor, or conduct to assist the officer in avoiding similar complaints in the future.

7. Without Merit:

All the facts set forth in a complaint can be accepted as true in all respects and these facts disclose no improper behavior on the part of the officer.

8. No Departmental Violation:

The investigation revealed no infractions of Departmental rules, directives, or procedures. *This is used as a finding for EEO allegations, (typically involving forms of retaliation, discrimination, and harassment) off duty action allegations, and use of force allegations only.

The chart on page 13 shows the findings that each category of allegation had across all cases audited in 2024.



Officers

The following chart shows the number of officers who appeared in more than one complaint investigation. 82 out of 687 officers had allegations against them in more than one case. That is 11% of the involved subject officers. Most of the officers investigated were involved in just one case that CPOC reviewed.



Of the 687 officers involved, 228 had sustained allegations against them. Of those 228 officers, most (172 or 75%) had just 1 sustained allegation. 40 officers (17.5%) had 2 sustained allegations, 11 (4.8%) officers had 3 sustained allegations, 4 (1.75%) officers had 4 sustained allegations, and 1 officer had 5 sustained allegations.

This data point indicates that when officers were found to have committed misconduct, they typically had just a single instance of it across all of the cases CPOC audited. Some of the officers with more than 1 sustained allegation within the cases audited had more than 1 sustained allegation in a single case, so this statistic does not necessarily indicate they engaged in multiple encounters that resulted in their multiple sustained allegations.



Qualitative Assessment Data

Audit Section: Timeliness

The timeliness audit section logs the length of each Internal Affairs investigation into a Complaint Against Police (CAP). The Mayor of Philadelphia's Executive Order 05-17 (Appendix 6) establishes a timeline of 90 business days for completing such investigations. The investigation period runs from the date the complaint was received to the date the case is approved by IAD supervisors.

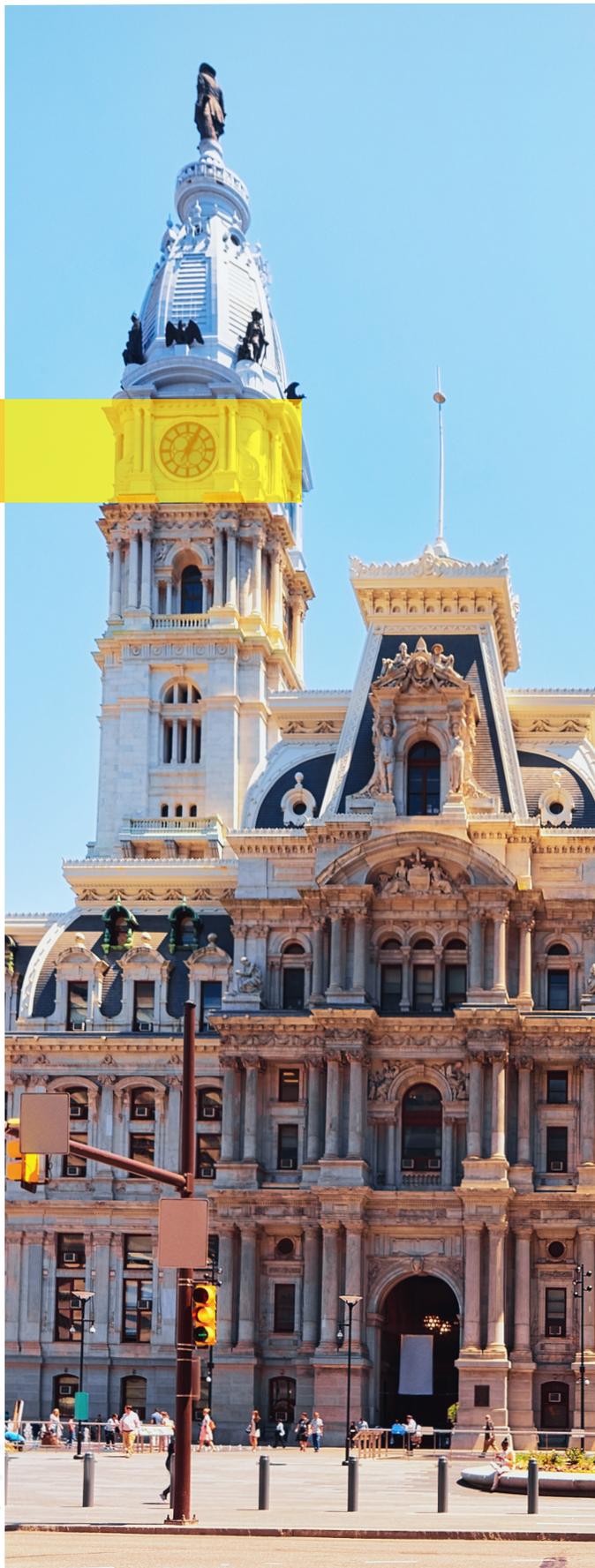
Investigations can be lengthy, and sometimes there are clear explanations for why investigations need more time to be completed. When those explanations are not clear, audits may help identify where in the investigative process delays occur most often to help identify solutions.

As stated in PPD's Office of Professional Responsibility (OPR) Policy 21, if an investigation exceeds the 90-day limit for investigations as mandated in the Mayor's Executive Order 05-17, a notation must be made in the first paragraph of the PC memo's investigative analysis section. This sentence will state that all parties have been notified of the delay and will explain the reason for the delay.

Results:

- **67% of all cases audited were completed with 90 business days.**
 - About 80% of the more recent cases in the live audit sample met this 90-day guideline.
- **Most (82%) of the cases that exceeded 90 business days included an explanation as outlined in Executive Order 05-17.**
- **For 29% of cases with a delayed investigation, the explanation for the delay was not clear.**

Note: CPOC Auditing and Research Analysts recognize a significant delay as a prolonged gap in investigative activity. An example of a gap could be a scenario in which an IAD investigator is assigned a case and immediately interviews the complainant, however, does not begin to interview the involved officers for over 3 months in real time. In this scenario, an investigative best practice would be for the investigator to provide an explanation to detail the reason for the elapsed time between the interview with the complainant and the interviews with the officers involved.



For the cases audited in 2024, 2/3 of the cases (67%) were completed within the required 90 business day timeline. Notably, in the live audits completed, this statistic was improved to be 79%. Across the entire sample of older cases and new cases in live audits, the average length of investigations was roughly 230 days (median length was roughly 155 days). Investigations ranged from just 13 days to 1,618 days (nearly 4.5 years). While more than 4 years is an extreme outlier within this sample, roughly 1 in 6 of the investigations we analyzed (16.4%) took longer than 400 days to complete.

PPD policy requires all investigations beyond 90 business days to include an explanation in the final PC memo. For the 119 cases that were not completed in 90 business days, roughly 20% did not include an explanation while 80% did. In some cases (29% of the cases that were delayed) the explanation provided for the extended length of the investigation was not clear. For example, Covid-19 was cited as the reason for the delay, but based on the materials in the case file, it was not clear how Covid-19 impacted the timeline.

Delays in investigative progress can negatively impact the quality and outcome of the IAD process. The complainant's willingness to participate and a witness or an officer's recollection of the incident are important aspects of an investigation that can be impacted by lengthy investigations. It is a suggested best practice for investigators to clearly explain any significant gaps in their investigative activities.

Audit Section: Professional Standard of Care

The goal of this section is to determine if the investigator used due diligence to complete the investigation thoroughly, objectively, and fairly, based on department standards and best practices.

These questions evaluate the investigator's thoroughness and objectivity at critical checkpoints in the investigative process, such as when contacting complainants and witnesses or describing the incident which prompted the complaint. This section also gathers data about how IAD staff classify the complaint on the white paper. Staff in the IAD intake center are required to select the most serious allegation as the white paper classification. As this classification does not change during the investigation and eventually gets included with PPD's public complaint data, the accuracy of this classification is important.

RESULTS OF PROFESSIONAL STANDARD OF CARE QUESTIONS:

- The selected classification most accurately fit the substance of the complaint **83%** of the time
- The investigator made all attempts to contact civilians **64%** of the time.
- The investigator exhausted all resources to identify the subject officer(s) **92%** of the time.
- **87%** of the time, investigators clearly articulated the incident and presented a clear picture of what occurred.
- In **92%** of the cases, the language used was neutral and did not favor any perspectives over others.

Results:

Results from this sample of case audits demonstrate that, for white paper incident classifications, the selected classification most accurately fit the substance of the complaint the vast majority of the time (83%). In about 1/3 (39%) of applicable investigations from this sample were cases where the IAD investigator did not make all attempts to identify, locate, and contact all civilian parties, including potential witnesses. For a portion of the review period, CPOC was inaccurately interpreting an IAD policy related to minimum contacts to complainants, so this statistic was impacted by this misinterpretation.

IAD does not currently have a minimum standard for contact attempts to involved civilians, but audits now look to see if at least one contact attempt is made to any civilian complainants, victims, and/or witnesses in a case. The lack of a policy related to civilian contacts may lead to inconsistencies across investigations.

RECOMMENDATION:

IAD should develop a policy related to minimum contact attempts to all civilian complainants, victims, and witnesses to ensure consistency across cases.

In the vast majority of cases (92%), the IAD investigator exhausted all available resources to identify the police officers accused of misconduct in the complaint. This meant that in 8% of the cases, CPOC saw other options or avenues present to possibly identify the officers involved in this incident.

Approximately one out of every ten (13%) of the audited IAD cases concluded with a PC memo that failed to clearly articulate the incident that was alleged to have occurred.

In just 8% of cases audited, CPOC auditors noted that there was language in the PC memo that suggested a lack of neutrality. This is noted in the language used by an investigator to describe the details of an incident, or in the weighing of officer testimony over the testimony from a civilian complainant or witness when all other factors are equal. An example is including information about a civilian that is not relevant to the allegations at hand but paints them in a negative light or inappropriately calls their credibility into question.

Audit Section: Evidence Collection and Analysis

This section assesses the evidence collected and the investigator's examination of evidence. It is critical for auditors to determine whether an investigator exhausted all possible avenues for acquiring evidence in an investigation. The quality and quantity of evidence collected by the investigator determines the extent to which allegations can be adjudicated. For example, a street camera that captures an incident can provide an objective account and prove/disprove allegations made by a complainant; if an investigator never checks for such video footage or waits beyond the video retention period and the video no longer exists, it becomes harder to reach a concrete conclusion.

Results:

Investigators almost always (90% of the time) obtained relevant audio/visual evidence before it got deleted – but it is important to note that sometimes complainants may report their complaint long after retention period for such evidence have expired.

In the relatively small number of cases that included witness testimony, the investigator appropriately considered the independence of witnesses and their testimony 9 out of 10 (92%) times. The independence of witnesses can be critical when a witness is connected to the complainant in some way, such as a relative or friend. On a case-by-case basis, it is important for investigators to weigh the independence/impartiality of a witness in relation to the quality of testimony provided. For example, in one case a city employee alleged that he encountered an officer who was threatening and rude. The city employee's coworkers provided consistent statements, but their statements did not sway the investigator. The investigator did not probe the nature of the relationship between the witnesses or assess the credibility of their statements.

RESULTS OF EVIDENCE COLLECTION AND ANALYSIS QUESTIONS:

- In 76% of applicable cases, the investigator indicated they checked for all audio/visual evidence including body worn camera footage.
- In 90% of applicable cases, the investigator obtained audio/visual evidence before it got deleted.
- In 84% of cases, the PC memo and index indicated the investigator collected all other foreseeable evidence
- Only 67 cases out of the 357 had witnesses involved. Of those, nearly all (92%) appropriately considered the independence of witnesses and their testimony

When CPOC began live audits, we got more access to case file materials and could ask additional questions about the cases audited. Of the 133 live audits CPOC did:

- In 76% of cases where applicable, the investigator accurately summarized audio and video evidence.
- In 20% of cases where applicable, CPOC's review of video footage produced additional allegations/ violations that were not addressed during the investigation.
- In 91% of cases the investigator accurately represented the details of all documentary evidence in the PC memo.

RECOMMENDATION:

IAD should develop a policy related to civilian witness statements that instructs investigators how to assess independence and credibility, and how to consider witness statements using the preponderance of the evidence standard.

There were several areas in evidence collection and analysis where auditors pinpointed room for improvement.

In most cases (84%), auditors found that the investigator identified and collected all additional foreseeable evidence related to the investigation (other than audio/visual evidence). Though this is positive statistic, the instances in which this did not occur are notable. For example, in one case a complainant gave a specific date for an encounter with an officer, but department records showed no evidence that the encounter occurred. The investigator did not appear to search nearby dates for records related to an encounter, even though complainants sometimes misremember dates of interactions. IAD does not have a policy that instructs investigators to look at dates other than the one provided by the complainant but doing such a search would indicate that the investigator exhausted all possible avenues to confirm and analyze the alleged misconduct. Additionally, in one fourth (24%) of cases, the investigator did not indicate in the PC memo whether they checked for the existence of audio recordings and video recordings, including body-worn cameras (BWCs). Though this does not mean the investigator did not actually check for these recordings, documenting critical investigative steps in the PC memo allows the reader to know that all steps were taken.

Documentation is a key aspect of IAD investigations as these cases are often revisited by different agencies outside of IAD that are tasked with making determinations regarding an officer's alleged misconduct. This is most clearly observed in PPD's grievance arbitration process in which an officer is allowed to grieve their discipline to an independent arbitrator. These arbitrators review the case, hear arguments from both the officer's FOP representative and a city attorney, and decide if PPD's punishment of the accused officer was justified. Because these arbitrators are non-law enforcement personnel and may not be familiar with investigative practices, clarity is imperative to ensure that an arbitrator does not misinterpret an omission by an IAD investigator as an investigative gap or evidentiary deficiency. An arbitrator's decision regarding discipline is final and cannot be overturned, so it is essential that IAD investigators adequately detail investigative steps throughout the course of their investigations.

BWCs are critical tools for evidence when used properly. Equally important in these investigations is ensuring that what is captured on these cameras is accurately summarized. In a quarter (24%) of the cases audited that had audio/visual evidence, CPOC found it was not accurately summarized. This can greatly impact the outcome of allegations because the summary of the BWC footage is the evidence that supervisors at IAD review to determine what the findings should be. If the summary mischaracterizes an officer's actions or behavior, they may not be held accountable for inappropriate behavior. For example, in one case an officer is heard on BWC footage arguing with a complainant and further escalating the encounter, but the officer's comments during this exchange were not represented in the PC memo. All officer conduct plainly seen and heard on BWC footage should be accurately summarized, especially if it relates to a violation of PPD policy.

Additionally, in 20% of the applicable cases with BWC footage to review, CPOC's audit found additional allegations or violations present. The goal of looking through footage is not to nitpick officer behavior or inundate them with sustained misconduct. CPOC's goal is to thoroughly review footage and note violations that potentially impact accountability with the goal of improving officer conduct. Reviewing and noting these infractions provides the opportunity for the violation to be acknowledged and corrected. Without these additional allegations being formally addressed in the investigation, an officer may not know about the misconduct and may continue to repeat those actions. For example, contained within BWC footage are often BWC violations, such as officers turning their cameras off early, starting their recordings late, or improperly operating their cameras. Proper usage of BWCs is crucial, and the only way to ensure they are always properly operated is if officers are in the habit of doing so. Correcting officer behavior regarding BWC operation is critical.

RECOMMENDATION:

IAD should develop a policy related to summarizing BWC footage that requires accurately including all statements made and actions taken by all parties involved relevant to the allegations and all potential violations of PPD policies.



Audit Section: Interviews

This section assesses the interviews conducted by investigators in the investigations audited, and how they are used in the PC memo. The outcome of an IAD investigation can at times depend on the quality of interviews conducted by the investigator. Assessing the interview summaries provided in PC memos can help identify patterns of gaps in questioning. When CPOC switched to doing live audits, staff gained access to the full interview memos for all interviews conducted in a case. This allowed staff to compare the full interview to the summary the investigator included in the PC memo.

Results:

Case files nearly always had complete records of all interviews conducted, and investigators typically interviewed officers only once, meaning they and their supervisors felt they obtained enough information in one interview to complete the investigation.

Investigator interviews with officers typically addressed all allegations raised by the complainant, which means that all alleged misconduct was addressed during questioning. However, audits found that investigators often did not ask enough follow-up questions of officers to truly understand their role or motivation during incidents. For example, officers will often review their BWC footage of an encounter before or during their interviews with investigators, but investigators do not typically use the footage as a tool to highlight inconsistencies in officers' statements or written reports related to an incident. It is important to note that IAD interviews are not audio recorded – investigators prepare a list of questions in advance and type the verbal responses as the interview proceeds. This format likely limits the free flow of information, as investigators must focus on accurately typing officer responses rather than being free to develop follow-up questions at a conversational pace. Similarly, in 22% of cases in which the complainant cooperated, reviews found that additional follow-up questions in those interviews would have been helpful.

RESULTS OF INTERVIEWS QUESTIONS:

- In 93% of applicable cases, officers were interviewed only once.
- In 85% of applicable cases, the investigator interviewed all officers or explained why certain officers were not interviewed.

When CPOC began live audits we received more access to case file materials and could ask additional questions about the cases audited. Of the 133 live audits CPOC completed:

- In 85% of applicable cases, the investigator addressed all allegations raised by the complainant in all officer interviews.
- In 98% of applicable cases there was an interview memo in the case file for each interview conducted.
- 1 in 5 cases (22%), interviews indicated there was additional evidence or witnesses, but the investigator did not follow up to obtain the evidence or contact those witnesses.
- In 84% of applicable cases, all relevant details from the interview memos in the case file were included in the PC memo.
- In 75% of applicable cases investigators addressed all of the allegations raised by the complainant during officer interviews.
- In more than 1 in 3 (39%) of applicable cases, investigators did not ask appropriate follow-up questions in officer interviews.
- In 22% of applicable cases, investigators did not ask appropriate follow-up questions in civilian interviews.
 - Notably, civilian complainants did not cooperate in 43% of the cases audited.



RECOMMENDATION:

IAD investigators should begin audio and/or video recording all interviews they conduct related to investigations to remove the burden of live transcription and allow for the free flow of information and follow up questions during interviews.

In 43% of cases audited, the complainant did not cooperate. Though we do not know exactly why each person made this choice, the location of IAD headquarters in Northeast Philadelphia and the requirement of an in-person interview could have been a contributing factor. Offering a virtual interview option to complainants could increase complainant cooperation.

RECOMMENDATION:

IAD should develop a policy related to virtual interviews for civilian complainants and witnesses to increase accessibility and efficiency.

Audit Section: Conclusions and Case Dispositions

The final group of auditing questions assesses the conclusions of the PC memo to ensure that the findings are supported by the evidence presented, and that they are fair and justified. This section is particularly important; it gets at the heart of the investigation. PPD's Standard Operating Procedure 21 requires investigators to address all allegations in the original complaint. If the investigation does not apply and analyze all allegations present, an officer may not be held accountable for a policy violation. That officer's discipline record is then incomplete, which prevents PPD from addressing and tracking repeat offenses. After implementing live audits, staff had access to the full case file and body worn camera footage, which provided much more context for the conclusions of the investigations. Additionally, this review provided the opportunity to determine if all policy violations were addressed by the investigator even in cases when the violations were not mentioned by the complainant.

Results:

Data analysis from this section determined that in about 8 out of 10 cases (78%), allegation findings on the conclusions page were logical and reasonable based on the analysis of evidence presented. CPOC hopes to see this number as close to 100% as possible, as this question is critical to examining the quality of analysis present in PC memos. Proper findings are extremely important and are the deciding factor in determining if an officer can be held accountable if needed. At times, an inaccurate finding is applied because of confusion. For example, if an officer used force during an encounter and it was done within policy, the correct finding would be "exonerated." However, investigators often use "unfounded" instead, which means the act did not occur. This may lead to inaccurate or inconsistent findings applied across investigations.

RESULTS OF CONCLUSIONS AND CASE DISPOSITION QUESTIONS:

- In 78% of cases, the findings were logical and reasonable based on the evidence presented in the PC memo.
- In most cases (87%) the analysis for the findings was inclusive of all relevant evidence and information presented elsewhere in the PC memo.
- Of the applicable cases, only 24% included a clear statement of applicable rule or regulation that was allegedly violated for each allegation.
- Of the 140 cases that had sustained allegations, slightly more than half (57%) sustained at least one allegation made by the complainant. 43% of cases with sustained allegations sustained only administrative violations related to paperwork or technical policy violations.

When CPOC began live audits, we received more access to case file materials and could ask additional questions about the cases audited. Of the 133 live audits CPOC examined:

- In most applicable cases (84%), case file materials indicated that allegations were listed against the correct officers.
- In roughly half of cases audited (45%), CPOC identified missing allegations that were present in case file materials but were not formally addressed in the PC memo.

RECOMMENDATION:

IAD should develop clear guidance for investigators about allegation findings to ensure findings are used consistently and established findings definitions are adhered to.

In just one quarter of applicable cases (24%) the PC memo included a clear and concise statement of applicable law, rule, or regulation that was allegedly violated or formed the basis for the investigation. Including a rule is not required by policy but is

best practice, particularly because it makes the subsequent Charging Unit process easier and the discipline charges clearer. It also allows officers to clearly understand which specific rule they broke and change their behavior accordingly.

RECOMMENDATION:

IAD should develop a policy that instructs investigators to include relevant policy excerpts to clearly list the policy relevant to the alleged misconduct and show how the officer adhered to or violated the policy.

Of the cases that had sustained findings, 43% sustained only administrative violations. Administrative violations are those related to things like paperwork, BWC violations, or radio usage (generally not raised by a complainant). In these instances, none of the complainant's original allegations are sustained—but a small administrative violation is sustained against an officer. The rest of the cases with sustained findings, 57% of applicable cases, sustained at least one allegation originally made by the complainant. This is an important statistic to note, because it shows what types of allegations are ending up with sustained findings.

In about one half (45%) of cases, not every allegation identified during the investigation was addressed as a formal allegation on the conclusions page. This rate of missing allegations is a cause for concern, particularly when tracking officers' histories of misconduct.

Missing Allegation/Violation	Count
Departmental Violation-Ppd Directives Violation (See Ppd#)	35
Unprofessional Conduct-Rude/Dismissive Behavior	31
Departmental Violation-Failure To Activate Bwc	19
Departmental Violation-Improper Stop/Detention	13
Verbal Abuse-Intimidating/Threatening Language	13
Lack Of Service-Failure To Provide Service/Take Police Action	12
Lack Of Service-Failure To Prepare/Accurately Complete Report	11
Departmental Violation-Improper Search/Seizure	10
Lack Of Service-Failure To Investigate/Accurately Complete Investigation	10
Departmental Violation-Refusal To Provide Badge Or Name	10



CPOC identified a total of 253 missing allegations that were not properly identified in the investigations audited. The table on page 25 represents the most common allegations identified via audits that were present in the cases audited but not represented on the conclusions page.

The most common was “Departmental Violation – PPD Directives Violation”, which covers a wide array of conduct. Some examples of directives violations that CPOC flagged in cases audited related to unsafe operation of a police vehicle, an officer failing to notify police radio of a stop, an officer inaccurately completing reports, and an officer improperly instructing someone to stop recording an encounter. Current IAD policy requires investigations to list all allegations made by a complainant in the PC memo as well as all other violations discovered during the investigation. Investigators have used discretion to determine which additional violations to include. This discretion is sometimes applied differently across investigations and means that certain violations are noted in one case but overlooked in others.

Note: *Recently, IAD has begun to capture administrative violations more consistently than they were at the time CPOC began the live audit process. CPOC has seen an increase in investigators addressing these violations since 2024.*



Moving Forward

Through the live audit process, CPOC has developed a positive working relationship with IAD and IAD leadership. CPOC intends to continue to work with IAD personnel to provide feedback on individual investigations as well as investigative processes. CPOC's overarching goal is to increase consistency across IAD investigations to promote fairness for complainants and officers alike. CPOC looks forward to working with IAD leadership to develop new policies that will be responsive to the recommendations made in this report.

Just as live audits provide feedback in real time about investigations, CPOC hopes to explore new ways to share data related to live audits on a more frequent basis.

CPOC's enabling legislation authorizes CPOC to conduct independent misconduct investigations. Auditing has allowed CPOC staff to deeply understand how investigations are currently done, spot areas for improvement, and identify things that CPOC's own investigations program could include. The collaboration between CPOC and PPD on the auditing process has been valuable and CPOC looks forward to continuing to build on this work.

APPENDIX

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Appendix 1, Part 1 – Council of Inspectors General on Integrity and Efficiency Investigations Quality Assessment Review: Individual Closed Case Review Checklist (Page 5)

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Appendix 1, Part 2 – Council of Inspectors General on Integrity and Efficiency Investigations Quality Assessment Review: Case Review Summary Checklist (Page 5)

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Appendix 2 – Auditing tool used by the Chicago Office of the Inspector General (Page 5)

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Appendix 3 – CPOC's Auditing Manual (Page 5)

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Appendix 4 – Full list of CPOC's auditing questions (Page 5)

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Appendix 5 – Philadelphia Police Department Office of Professional Responsibility policy #8 – case dispositions and investigative findings (Page 13)

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Appendix 6 – City of Philadelphia Executive Order 5-17 Processing of Civilian Complaints Alleging Police Misconduct (Page 16)

CIGIE Investigations Quality Assessment Review: Individual Closed Case Review Checklist

PURPOSE: Appendix D-1 is based on CIGIE’s Quality Standards for Investigations. The Quality Standards contain three general standards (Qualifications, Independence, and Due Professional Care) and four qualitative standards (Planning, Execution, Reporting, and Information Management).

This checklist is used to review Closed Case Files in an effort to determine the level of conformity with the standards adopted in the CIGIE Quality Standards for Investigations. Complete one checklist for each closed case reviewed. Enter a Y (Yes), N (No), or NA (Not Applicable) for each of the items on this checklist. Enter comments as applicable. Answers to certain questions below—particularly in the Independence and Due Professional Care sections—may not be readily available or apparent. In these instances, the peer review team should assess whether there is clear, specific and articulable information in the case file to suggest the standard was violated. In the absence of such information, the appropriate answer is “yes” to the corresponding question. The “Comments” field is used by the reviewing agency for miscellaneous notes or explanations.

The results of these checklists will be summarized in the *CIGIE Peer Review Case Review Summary Checklist* (Appendix D-2)

OIG Being Reviewed:	Closed Case # Being Reviewed:
Reviewing OIG:	Closed Case Office:
Date of Case Review:	Reviewer:

A. INDEPENDENCE		
<u>Criteria/Requirements</u>	<u>Y/N/NA</u>	<u>Comments</u>
1. Were the investigators free, both in fact and appearance, from impairments to independence?		
B. DUE PROFESSIONAL CARE		
<u>Criteria/Requirements</u>	<u>Y/N/NA</u>	<u>Comments</u>
2. Were reasonable steps taken to ensure pertinent issues were sufficiently resolved and all appropriate criminal, civil, contractual, or administrative remedies are considered?		
3. Does available information suggest that constitutional rights were respected (e.g., Garrity, Kalkines, Miranda, etc.)?		
4. Was the investigation conducted in a fair and equitable manner?		
5. Was evidence gathered and reported in an unbiased and independent manner?		
6. Were investigative activities conducted and reported with due diligence and in a timely manner?		
7. Were the investigative report findings and accomplishments supported by adequate documentation?		

C. PLANNING		
<u>Criteria/Requirements</u>	<u>Y/N/NA</u>	<u>Comments</u>
8. Was the incoming complaint evaluated against investigative functions, priorities, and guidelines?		
9. Was initiation of the case approved by a supervisor?		
10. If appropriate, does the file contain information that an investigative plan of action was established?		
11. When present, was the investigative plan consistent with the <i>Quality Standards for Investigations</i> ?		
D. EXECUTION		
<u>Criteria/Requirements</u>	<u>Y/N/NA</u>	<u>Comments</u>
12. Did investigators act as fact-gatherers and not allow conjecture, unsubstantiated opinion, or bias to affect activities?		
13. Was the FBI notified promptly? (if applicable)		
14. Were two investigators present when conducting interviews in situations that were potentially hazardous or compromising?		
15. Were contemporaneous interview notes retained in case file until final disposition?		
16. Did investigators comply with organizational policies/procedures for the gathering, preserving, and/or disposing of evidence?		
17. Were investigative activities documented in the case file?		
18. Were subjects' rights and waivers clearly documented (when administered)?		
19. Were witness confidentiality requests documented?		
20. Where requested and granted, was the confidentiality of witnesses adequately protected?		
21. Was consensual monitoring conducted in accordance with agency policy/procedures?		
22. Was a confidential source/informant utilized in accordance with agency policy/procedures?		
23. Was an undercover operation or activity utilized in accordance with agency policy/procedures?		
24. Was a Sensitive Target involved in this case? (i.e. Public Official, Law Enforcement, Diplomatic Corps, Witness Security Program, etc.)		
25. Was Grand Jury material properly marked, securely stored, and properly disposed of?		
26. Were supervisory case reviews conducted?		

E. REPORTING		
<u>Criteria/Requirements</u>	<u>Y/N/NA</u>	<u>Comments</u>
28. Were reports accurate, clear, complete, concise, logically organized, timely, and objective?		
29. Did reports include a clear and concise statement of the applicable law, rule, or regulation that was allegedly violated or that formed the basis for an investigation?		
30. Was evidence outlined in a report supported by documentation in the investigative case file?		
31. Were reports free of opinions; personal views; unsupported assessments, conclusions, observations, or recommendations?		
32. If applicable, were systemic weaknesses identified during investigation reported to agency officials?		
33. Were reports prepared in accordance with the agency's policies?		
F. INFORMATION MANAGEMENT		
<u>Criteria/Requirements</u>	<u>Y/N/NA</u>	<u>Comments</u>
34. Was a case file established immediately upon the opening and assignment of an investigation?		
35. Is the case file formatted, organized, and maintained in a manner that is consistent with agency policies?		
36. Was information about the case—such as opening date, judicial actions and outcomes, administrative outcomes, reports issued, identifying information about witnesses and subjects, and related data—in a form that allowed for effective retrieval, referencing, and analysis?		
E. Comments (continued)		

CIGIE Investigations Quality Assessment Review: Case Review Summary Checklist

PURPOSE: Appendix D-2 is based on CIGIE’s Quality Standards for Investigations. The Quality Standards contain three general standards (Qualifications, Independence, and Due Professional Care) and four qualitative standards (Planning, Execution, Reporting, and Information Management).

This checklist is used to capture—in one document—the summary results from the review of closed case files (Appendix D-1). This checklist is used in an effort to determine the level of conformity with the standards adopted in the CIGIE Quality Standards for Investigations.

<u>OIG Being Reviewed:</u>	
<u>Reviewing OIG:</u>	
<u>Dates of Case Review:</u>	
<u># of Closed Cases Available for Review:</u>	
<u># of Closed Cases Reviewed:</u>	

Instructions: Complete one D-2 checklist to summarize the results of the D-1 case reviews. Enter C (Compliant), NC (Non-Compliant) or NA (Not Applicable) in the second column for each element. If you enter NC, explain what you have found in the *Comments* column. Identify how this problem represents a serious failure to comply with a particular Attorney General Guideline; external regulation, policy, or guideline; or CIGIE Quality Standard.

A. DUE PROFESSIONAL CARE		
<u>Criteria/Standard</u>	<u>Compliant/Non-Compliant (C/NC)</u> <u>Not Applicable (NA)</u>	<u>Comments</u>
1. Were the investigators free, both in fact and appearance, from impairments to independence?		

D. PLANNING		
<u>Criteria/Standard</u>	<u>Compliant/Non-Compliant (C/NC)</u> <u>Not Applicable (NA)</u>	<u>Comments</u>
2. Were reasonable steps taken to ensure pertinent issues were sufficiently resolved and all appropriate criminal, civil, contractual, or administrative remedies are considered?		
3. Does available information suggest that constitutional rights were respected (e.g., Garrity, Kalkines, Miranda, etc.)?		
4. Were investigations conducted in a fair and equitable manner?		
5. Was evidence gathered and reported in an unbiased and independent manner?		
6. Were investigative activities conducted and reported with due diligence and in a timely manner?		
7. Were investigative report findings and accomplishments supported by adequate documentation?		
C. PLANNING		
8. Were incoming complaints evaluated against investigative functions, priorities, and guidelines?		
9. If appropriate, did files contain information that investigative plans of action were established?		
10. When present, were investigative plans consistent with the <i>Quality Standards for Investigations</i> ?		
D. EXECUTION		
11. Did investigators act as fact-gatherers and not allow conjecture, unsubstantiated opinion, or bias to affect activities?		
12. Was the FBI notified in accordance with Attorney General guidelines?		
13. Were two investigators present when conducting interviews in situations that were potentially hazardous or compromising?		
14. Were contemporaneous interview notes retained in case files until final disposition?		
15. Did investigators comply with organizational policies/procedures for the gathering/preserving, and/or disposing of evidence?		
16. Were investigative activities documented in the case files?		

<u>Criteria/Standard</u>	<u>Compliant/Non-Compliant (C/NC)</u> <u>Not Applicable (NA)</u>	<u>Comments</u>
17. Were subjects' rights and waivers clearly documented (when administered)?		
18. Were witness confidentiality requests documented?		
19. Where requested and granted, was the confidentiality of witnesses adequately protected?		
20. Was consensual monitoring conducted in accordance with the procedures established by AG guidance?		
21. Was Grand Jury material properly marked, securely stored, and properly disposed of?		
22. Were supervisory case reviews conducted?		
23. Did these investigations comply with appropriate AG Guidelines?		
E. REPORTING		
24. Were reports accurate, clear, complete, concise, logically organized, timely, and objective?		
25. Did reports include a clear and concise statement of the applicable law, rule, or regulation that was allegedly violated or that formed the basis for an investigation?		
26. Was evidence outlined in reports supported by documentation in the investigative case file?		
27. Were reports free of opinions, personal views, unsupported assessments, conclusions, observations, or recommendations?		
28. If applicable, were systemic weaknesses identified during investigations reported to agency officials?		
29. Were reports prepared in accordance with the agency's policies?		
F. INFORMATION MANAGEMENT		
30. Were case files established immediately upon the opening and assignment of an investigation?		
31. Were case files organized and maintained in a manner that is consistent with agency policies?		
32. Was information about the case—such as opening date, judicial actions and outcomes, administrative outcomes, reports issued, identifying information about witnesses and subjects, and related data—in a form that allowed for effective retrieval, referencing, and analysis?		

G. Comments

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

COVER SHEET

Investigative Analyst

OIG Case Number

STATEMENT OF PURPOSE

PURPOSE: The purpose of this document is to collect data regarding closed cases selected for assessment and to provide guidance to Investigative Analysts during the inspection of closed police disciplinary investigations. The questions are designed to serve the overall purpose of the inspection, which is to assess the closed investigation for any material deficiency. The results of this assessment will be summarized in a Findings Memorandum.

LOG INVESTIGATION

Log Number		Log Type	
Investigating Agency		Case Status	
Incident Group*		Incident Category*	
<i>* Note - Initial Incident Group and Category</i>		Incident Subcategory*	
Incident Category Desc.			
Incident Subcategory Desc.			
Police Encounter Type			

INVESTIGATION TIMELINE

Incident Date			
Complaint/Notification Date		Days to File	
Investigator Assigned Date		Days to Assign	
Investigation Completed Date		Days to Conclude	

INVESTIGATOR

Primary Investigator Name		Employee #	
Title/Rank		Star #	
		Unit Assignment	
Additional Investigator(s)?		Appointed Date	

SUPERVISOR

Supervisor Name		Employee #	
Title/Rank		Star #	

CASE FILE DOCUMENTATION

Complaint Origin Report		Conflict Cert.	
Sworn Affidavit		OEMC/PCAD Reports	
Case Incident Report		Victim Statement	
Tactical Response Report		Witness Statement	
Arrest Report		Accused Statement	
Summary Report/Digest		Statement Recorded	
Video Evidence		Video Source	
Audio Evidence		Audio Source	
Photo Evidence		Photo Source	
Documents Not Included		Case Data Tracking Tags	

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION			
CLOSED CASE ASSESSMENT			
COVER SHEET			
Investigative Analyst		OIG Case Number	
LOG INVESTIGATION			
Log Number		Log Type	
Investigating Agency		Case Status	
Incident Group		Incident Category	
ACCUSED			
Name		Date of Birth	
Title/Rank		Sex	
Employee #		Race	
Star #		Appointed Date	
Unit Assignment		Add'l Accused?	
		Total Accused	
COMPLAINANT / REPORTING PARTY			
Name		CPD Member?	
Date of Birth		Title/Rank	
Age		Employee #	
Sex		Star #	
Race		Unit Assignment	
District of Residence		Appointed Date	
Additional Complainant(s)?			
VICTIM			
Name		CPD Member?	
Date of Birth		Title/Rank	
Age		Employee #	
Sex		Star #	
Race		Unit Assignment	
District of Residence		Appointed Date	
Additional Victim(s)?			
If Group 18 (Shooting with Hits) - was Victim armed?			
ALLEGATIONS AND RULE VIOLATIONS			
Allegation - 1		Finding - 1	
Final Incident Category - 1		Rule Violation - 1	
Allegation - 2		Finding - 2	
Final Incident Category - 2		Rule Violation - 2	
Allegation - 3		Finding - 3	
Final Incident Category - 3		Rule Violation - 3	
Allegation - 4		Finding - 4	
Final Incident Category - 4		Rule Violation - 4	
Allegation - 5		Finding - 5	
Final Incident Category - 5		Rule Violation - 5	
Add'l Allegations?			
DISCIPLINE			
Recommended Discipline		Recommended for BIS	
		Recommended for PCP	

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

CLOSED CASE ASSESSMENT SUMMARY

TIMELINESS

PROFESSIONAL STANDARD OF CARE

INTERVIEWS

EVIDENCE COLLECTION AND ANALYSIS

INTERNAL OVERSIGHT

CASE DISPOSITION

CLOSED CASE ASSESSMENT NOTES

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

TIMELINESS

CATEGORY OBJECTIVE: To determine if this investigation was conducted within the benchmarks for timeliness set by the Municipal Code of Chicago, the investigative agency, and established investigative best practices.

REFERENCES

COPA Investigations Manual (Sept. 2017)

CPD S08-01-01 Conduct of Complaint Investigations (Nov. 2017)

Metric	Notes
1.) Was the investigation completed within a reasonable amount of time, including meeting agency benchmarks where applicable?	
2.) If agency benchmarks for timeliness were not achieved, are explanations included in the file?	
3.) Are there significant gaps in investigative activity which are not sufficiently explained?	
4.) If applicable, is there proper documentation for an extension request maintained in this file?	
5.) Does the case file or the activity log show that the investigator prepared and forwarded correspondence to the involved parties in a timely manner?	
6.) Were all interviews conducted in a timely manner in order to ensure the best recollection of the facts?	
7.) Did the reporting investigator complete investigative reports in a timely manner?	

ADDITIONAL NOTES - TIMELINESS

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

PROFESSIONAL STANDARD OF CARE

CATEGORY OBJECTIVE: To determine if the investigator used due diligence to complete the investigation thoroughly, objectively, and fairly, based on the investigative agency standards, and on codes of practice.

REFERENCES

COPA Investigations Manual (Sept. 2017)

CPD S08-01-01 Conduct of Complaint Investigations (Nov. 2017)

CPD S08-01-03 Complaint Summary Reporting Procedures (May 2018)

CPD-44.248 Incident Category Table (Jan. 2018)

Metric	Notes
1.) Does the selected category code most accurately fit the substance of the complaint?	
2.) Did the investigator make reasonable attempts to identify, locate, and contact all involved parties - including all potential witnesses?	
3.) Did the investigator identify, name, and appropriately classify all involved parties?	
4.) Were all allegations - including newly identified allegations - documented and properly enumerated?	
5.) Do the listed allegations adequately capture the concerns raised by the complainant?	
6.) Did the investigator adequately identify and follow up on any new leads developed in the investigation?	
7.) Does the investigator's log capture and document all investigative activity?	
8.) Were reports accurate, clear, complete, concise, logically organized, and objective?	
9.) Were reports prepared in accordance with the investigating agency's policies?	
10.) Is there evidence that the investigator allowed biases to affect the investigation or findings?	

ADDITIONAL NOTES - PROFESSIONAL STANDARD OF CARE

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

INTERVIEWS

CATEGORY OBJECTIVES: (1) To assess the investigator's thoroughness and the quality of questions posed to complainants, subjects, and witnesses during the interview process; and (2) to examine the use of proper interviewing protocols.

REFERENCES

COPA Investigations Manual (Sept. 2017)

CPD S08-01-01 Conduct of Complaint Investigations (Nov. 2017)

CPD G08-01-01 Member's Bill of Rights (May 2018)

City of Chicago Collective Bargaining Agreements (FOP - Expired June 2017)

Metric	Notes
1.) Did the investigator complete a report documenting every interview conducted with an involved party? <i>This includes all complainants, reporting parties, victims, witnesses, and accused members.</i>	
2.) Is there a signed Consent to Record form for each person who provided a recorded statement?	
3.) Where applicable, were interviews scheduled and conducted in accordance to the respective Collective Bargaining Agreement (CBA) & Members' Bill of Rights?	
4.) Were the appropriate number of interviewers present during the member witness and/or accused member interviews?	
5.) Did the investigator use different manners of questioning, demeanor, and/or tone of voice, etc. when interviewing department members versus civilians?	
6.) Did the investigator use leading questions when interviewing witnesses?	
7.) Did the investigator use leading questions when interviewing the accused member(s)?	

ADDITIONAL NOTES - INTERVIEWS

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

EVIDENCE COLLECTION AND ANALYSIS

CATEGORY OBJECTIVES: (1) To assess the evidence collected and determine the objectivity of the investigator's examination of evidence; and (2) to review for the absence of evidence that might have been useful in determining the disposition of the case.

REFERENCES

COPA Investigations Manual (Sept. 2017)

CPD Log Number Investigations Training for Pre-Service Sergeants (June 2018)

CPD S04-03-03 Release of Medical Information (June 1991)

CPD-11.717 Forms Retention Schedule (Jan. 2018)

Metric	Notes
1.) Did the investigator identify, locate, and collect all foreseeable evidence related to the investigation?	
2.) Did the investigator request audio and/or video evidence within the appropriate retention schedule?	
3.) Did the investigator obtain the evidence necessary for developing a sound finding in the case?	
4.) Did the investigator obtain enough information to prove or disprove each individual allegation?	
5.) Was all of the evidence collected and documented relevant to the investigation?	
6.) Did the investigator check for the existence of audio recordings and video recordings?	
7.) If applicable, were audio recordings included?	
8.) If applicable, were video recordings included?	
9.) If applicable, was a photo lineup included?	
10.) If applicable, were crime scene photos included?	
11.) If medical records were obtained, did the investigator follow the required protocol to secure PHI?	
12.) Did the investigator draw logical and reasonable conclusions based on the analysis of the evidence?	

ADDITIONAL NOTES - EVIDENCE COLLECTION AND ANALYSIS

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

INTERNAL OVERSIGHT

CATEGORY OBJECTIVE: To examine the supervisory process and internal quality controls used during the course of the investigation, and during final review stages.

REFERENCES

COPA Investigations Manual (Sept. 2017)

CPD S08-01-03 Complaint Summary Reporting Procedures (May 2018)

Metric		Notes
1.) Is there evidence of a supervisor's involvement in the investigation (where necessary and/or appropriate)?		
2.) Is there evidence of a supervisor requesting additional investigation (where necessary and/or appropriate)?		
2.) If the investigation has already gone through Command Channel Review, are comments gathered during CCR documented/preserved?		

ADDITIONAL NOTES - INTERNAL OVERSIGHT

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

CASE DISPOSITION

CATEGORY OBJECTIVE: To assess final reports to ensure that all pertinent information is captured, that the findings are supported by the evidence presented, and that the recommendations are fair and justified.

REFERENCES

COPA Investigations Manual (Nov. 2017)

CPD S08-01-01 Conduct of Complaint Investigations (Nov. 2017)

CPD S08-01-03 Complaint Summary Reporting Procedures (May 2018)

Metric		Notes
1.) Was a final case summary report included in the file?		
2.) Did the case summary report include a clear and concise statement of applicable law, rule, or regulation, that was allegedly violated or that formed the basis for the investigation?		
3.) Was there any exonerating or incriminating evidence not considered by the reporting investigator that could have materially affected of the investigation?		
4.) Were material inconsistencies between statements and evidence resolved in the investigative findings?		
5.) If applicable, is there evidence that the accused member's complimentary and/or disciplinary history was factored into the recommended discipline?		

ADDITIONAL NOTES - CASE DISPOSITION

CITY OF CHICAGO - OFFICE OF INSPECTOR GENERAL - PUBLIC SAFETY SECTION

CLOSED CASE ASSESSMENT

Investigative Analyst

OIG Case Number

Log Number

SEXUAL MISCONDUCT INVESTIGATION

CATEGORY OBJECTIVE: To assess the quality of sexual misconduct investigations and provide aggregate data on sexual misconduct investigations, pursuant to obligations stipulated in *Illinois vs. Chicago* (the CPD consent decree).

REFERENCES

Illinois vs. Chicago, Section 444 (Mar. 2019)

Metric	Notes
1.) Was the investigation referred to the Cook County State's Attorney's Office for criminal review?	
2.) Were the allegations criminally prosecuted?	
3.) Was the investigation closed following the preliminary investigation stage?	
4.) Was the investigation closed due to a lack of a sworn affidavit signed by the complainant?	

ADDITIONAL NOTES - SEXUAL MISCONDUCT INVESTIGATION

2025

Auditing Standards and Procedures for Complaints Against the Philadelphia Police Department

**A MANUAL DESCRIBING CPOC'S
COMPLAINT AUDITING PROCESS
AND PPD'S COMPLAINT
INVESTIGATIONS**

What is a Complaint Audit at CPOC?

At the Citizens Police Oversight Commission (CPOC), auditing a complaint against police involves gathering data about the facts underlying the complaint and the investigation conducted by Internal Affairs investigators to assess the process for quality, thoroughness, and objectivity.

The Philadelphia Police Department's Internal Affairs Division (IAD) forwards completed police misconduct investigation case files directly to CPOC as they are finished but before they are finalized. From there, the CPOC Auditing, Policy, and Research Division has 11 business days to complete their review of the case file. Once CPOC receives the cases to audit, the Director of the Auditing, Policy, and Research Division randomly selects cases to audit based on staff capacity and the volume of cases received. CPOC only receives investigations based on complaints made by members of the public (known as "Complaints Against Police" or "CAPs,"). CPOC does not receive internal investigations.¹

The outcome of each investigation is critical: if the investigator did not sustain any allegations against an officer, the process ends; if any allegations were sustained through the investigation, the case moves through the Police Board of Inquiry (PBI) discipline process, including the Charging Unit and a PBI Hearing when necessary.² Investigation outcomes are discussed in this manual. When the investigation and subsequent disciplinary process—if needed—are complete, CPOC's Auditing, Policy, and Research Division receives the Police Commissioner's Memorandum (PC Memo). These documents form the basis of our audits.

CPOC utilizes a series of questions to systematically evaluate the investigation described in each PC memo. These questions provide space for auditors to highlight areas of concern, such as missing allegations against an officer or discrepancies between the evidence presented and the investigation's conclusion.

Why is it Important for CPOC to Audit Complaints Against Police?

CAPs are currently investigated solely by Internal Affairs, which is a unit housed within PPD and is comprised of investigators who are sworn PPD personnel. Auditing the investigations into CAPs helps us better understand an insulated, internal discipline process. Police misconduct investigations in Philadelphia have not been subject to consistent reviews from outside perspectives before. The public at times does not trust the investigative process and have expressed concern that officers investigating other officers are unfairly sympathetic to officers accused of misconduct, as well as less likely to empathize with victims of misconduct. Through reviewing these cases and recommending improvements CPOC may be able to help build more public understanding and trust in the process.

CPOC's auditing process is designed to identify themes or trends across investigations. This is a rich data set that could lead to various outcomes, such as identifying which neighborhoods experience or report misconduct most frequently, understanding what that could mean for PPD operations, and looking for ways to ensure IAD investigations are consistent so that residents and officers alike can benefit from procedural fairness.

¹ Internal investigations are defined in PPD Office of Professional Responsibility (OPR) Policy #10 as "complaints originating from a source other than a citizen or citizens' group; any allegation of corruption or serious police misconduct received; but not limited to:

1. Requests or information received by anonymous sources or by Police Department personnel alleging corruption, misconduct, or departmental violations.
2. Information alleging police misconduct received from other law enforcement or criminal justice agencies, e.g. FBI, District Attorney's Office, other police departments, etc.
3. Anonymous information alleging corruption, misconduct, or departmental violations."

² For more information about the PBI Charging Unit and PBI Hearings, see CPOC's follow-up report on the PBI Collaborative Reform process.

How was the CPOC Auditing Process Developed?

CPOC's legislation authorizes the agency to conduct individual investigations into citizen complaints of police misconduct, conduct audits, produce policy reports, and publish data. Until CPOC is fully staffed and has developed the necessary processes to carry out the investigative piece of the legislation, CPOC's audits of IAD misconduct investigations provide an effective oversight tool, which helps improve the accountability functions that are already in place at PPD.

CPOC developed a process for reviewing IAD investigations into CAPs following practices in use by other federal and local government oversight bodies. CPOC staff researched how oversight agencies conduct this work in other cities, specifically large cities that are comparable to Philadelphia in their volume of complaints and police department size.

CPOC developed standard criteria and questions to aid in reviews of PC memos to ensure that all cases are reviewed the same way and that information is collected consistently. The audits record quantitative aspects of investigations, like whether investigations were completed within 90 days, as well as more qualitative standards, like whether the findings matched the evidence presented in the PC memo. The standards for review were developed using PPD Office of Professional Responsibility (OPR) Policies, standards for peer review of closed cases developed by the Council of the Inspectors General on Integrity and Efficiency, and a similar auditing tool used by the Chicago Office of the Inspector General (Appendix 1).

What's New: Live Audits

In July 2024, CPOC began doing "live audits" of IAD CAP investigations. IAD and CPOC collaborated to develop this process. CPOC staff now review the full investigative file for CAP cases once the investigation is completed but before the case is finalized. CPOC staff can make individual recommendations to investigators if audit showed any issues that materially impacted the case or if there are investigative best practices that should have been followed. This change to the auditing process allows for CPOC's perspective, as the oversight body for the PPD, to be included in investigations.

Investigators are not required to accept CPOC's recommendations. Investigators prepare a memo in response to the recommendations made. The Deputy Commissioner that oversees IAD then reviews CPOC's recommendations and the investigator's response and makes a final decision. IAD then sends the final PC memo to CPOC so CPOC can track which recommendations were accepted.

PPD INTERNAL AFFAIRS INVESTIGATIONS OVERVIEW: INTAKE, CLASSIFICATION, INVESTIGATION, & OUTCOMES

IAD Intake & Classification

The Internal Affairs Division at PPD receives complaints against police from handwritten forms submitted at PPD districts, PPD’s online form, walk-ins at IAD, and via referrals from CPOC. Other agencies can refer complaints as well. The intake center at IAD handles all intake duties.

Staff at the intake center create a typed summary of the complaint and the involved officers on a document referred to as the “white paper.” The intake center classifies the complaint on the white paper based on the most serious allegation present, using the hierarchy of categories below. This classification does not change during the investigation and eventually gets included with PPD’s public complaint data.

The list includes 15 allegation categories, in order of severity.

- | | |
|----------------------------|--------------------------------|
| 1. Sexual Crime/Misconduct | 9. Departmental Violations |
| 2. Domestic | 10. Unprofessional Conduct |
| 3. Criminal Allegation | 11. Verbal Abuse |
| 4. Physical Abuse | 12. Lack of Service |
| 5. Civil Rights Complaints | 13. Other Misconduct |
| 6. Drugs | 14. Non-Investigatory Incident |
| 7. Falsification | 15. Confidential Investigation |
| 8. Harassment | |

A subclassification is also selected for each complaint. The subclassification is also hierarchical, determined by the classification. The full list of classifications and subclassifications is included as Appendix 2 in this report. Below is an example of subclassifications associated with the Falsification classification:

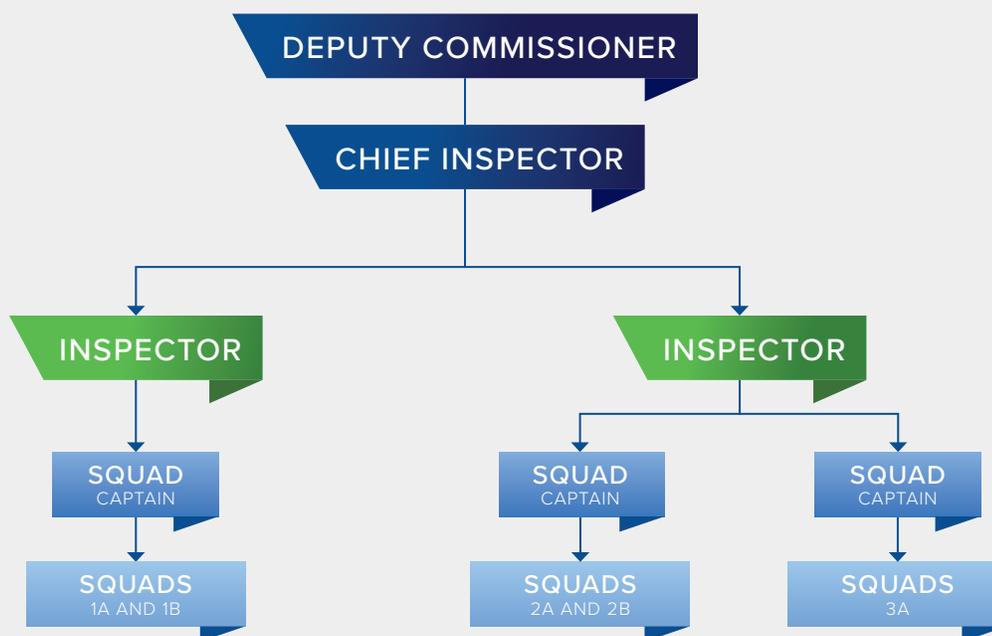
Classification 7: Falsification

- | | | |
|----------------------|-------------------|--------------------|
| – Military Orders | – Information | – Injury Paperwork |
| – Official Documents | – Injuries/I.O.D. | |
| – Statements | – Sick Notes | |

After the primary classification and subclassification are selected for the white paper, the complaint is then assigned to an IAD squad based on the geographic region of the incident. An IAD squad is a group of investigators headed by a primary, supervisory investigator, known as a Squad Captain. The Squad Captain assigns a specific investigator to the complaint.

Below is a simplified excerpt from the IAD organizational chart. This chart only covers the investigators within Internal Affairs which investigate Complaints Against Police; there are other IAD squads that handle special cases, like Equal Employment Opportunity, that are not covered here.

Internal Affairs Organization Chart



Investigations

After being assigned the investigation, the IAD investigator contacts the complainant. The investigator introduces themselves to the complainant as the assigned investigator for their complaint, and attempts to schedule a formal interview.

Complainants may not respond to the IAD investigator's contact attempts. While an investigator can do some other investigative work without the complainant's cooperation, it is difficult to move forward with a thorough investigation when the complainant is not interviewed about their experience in depth.

Interviews of all complainants, witnesses, and officers are conducted in person at the Internal Affairs headquarters at 7790 Dungan Road in Northeast Philadelphia. When an in-person interview is not possible, investigators can conduct interviews via telephone. Investigators use interview questions previously prepared based on information gathered and additional information gained as the interview progresses.

While complainant, victim, and witness interviews are scheduled and completed, the investigator also works to obtain any relevant evidence. Evidence can include body worn camera footage; external surveillance footage, such as dash cameras and security cameras; and PPD documents, such as incident reports, radio logs, patrol logs, and medical records. If a complainant was not able to identify the specific officer(s) involved in the complaint, the investigator can use patrol logs and other police documents to attempt to determine the identity of the officer(s).

Lastly, the investigator interviews any officers involved in the complaint. Officer interviews may include target officers (who are accused of misconduct) and non-target officers (who may have witnessed the incident but are not accused of misconduct).

Investigators must check the court attendance system, training schedules, and vacation files to prevent conflicts when scheduling officer interviews. Generally, officers attend interviews while on duty and are not allowed to use overtime for an IAD interview. An officer will often report to an interview with an attorney or representative from the Fraternal Order of Police (FOP) to represent them and provide guidance as needed. According to OPR Policy 5, Investigators must give officers 72 hours' notice before an IAD interview so that they can obtain FOP representation; these interviews are compelled, meaning that if an officer declines to come in for an interview, they will be penalized according to PPD's Disciplinary Code.

At every officer interview, the investigator must give officers Garrity warnings. Garrity warnings function similarly to Miranda warnings, which are used in criminal interviews but are administered to any employee questioned as part of an administrative investigation. The warnings are designed to safeguard a person's 14th and 5th Amendment rights; any information that might be obtained during questioning, or the "fruits" thereof, cannot be used in connection with criminal proceedings that could potentially be brought against the officer.

It is important to note that the vast majority of CAPs do not involve criminal or potentially criminal allegations. A sample officer interview transcript with Garrity warnings, as well as a sample civilian interview transcript, are included as Appendix 3.

IAD interviews are currently not audibly or visually recorded; investigators manually type out officer responses as they give them. At the conclusion of the interview, the officer reviews the interview transcript and signs each page to confirm the information stated is accurate. Any other parties present, such as an FOP representative or a CPOC staff member, also review the transcript for accuracy and sign or initial it. This review and signing process is the same for civilian interviews as well. Investigators can re-interview officers and civilians to obtain clarification on previous statements or collect more information.

Investigative Outcomes

When the investigation is complete, the investigator determines the appropriate findings for each allegation in the complaint and provides an explanation for each finding based on the evidence collected. Allegations generally follow the classifications and subclassifications format previously shown. Although the white paper only includes one classification and subclassification for each complaint, there is no limit to how many allegations can be listed against officers. The investigator must establish which allegations are present in the complaint and address the allegations in the findings. Any allegations missed by investigators will not be considered for disciplinary action or placed on the officer's record.

The standard of proof for administrative investigations is "preponderance of the evidence." Preponderance of the evidence is met, if, considering all the evidence, the allegation is more likely to have occurred than not. Preponderance of the evidence is sometimes defined as "51%," or "50% and a feather."

For each allegation in the complaint, the investigator is tasked with deciding the findings based on the preponderance of the evidence standard. There are several possible findings for each allegation. The most common are: "sustained," "not sustained," "unfounded," "exonerated," and "withdrawn." The full list of investigative outcomes from OPR Policy #8 is included as Appendix 4 to this report.

INTERNAL AFFAIRS INVESTIGATIONS

Allegation Findings

FINDING	DID INCIDENT OCCUR?	WAS POLICY VIOLATED?
SUSTAINED		
NOT SUSTAINED		
UNFOUNDED		
EXONERATED		
WITHDRAWN		

1. **Sustained:** The investigation demonstrated that the incident/infraction occurred, and the action(s) alleged in the complaint were inconsistent with Departmental policy, directives, orders, and/or applicable local, state, or federal laws.
2. **Not sustained:** The investigation could neither prove nor disprove whether the incident/infraction occurred. “Not sustained” findings are used by investigators often.
 - a. Example: a member of the public filed a complaint and alleged that an officer verbally abused them. The officer denied verbally abusing the complainant in their interview, and without any independent evidence—such as body camera footage, external surveillance footage, or independent witness testimony—there is no way for the investigator to prove whether the accused conduct occurred or not. A “not sustained” outcome for an allegation of verbal abuse would be applied in this example.
3. **Unfounded:** The investigation revealed that the incident/infraction did not occur.
4. **Exonerated:** The investigation revealed, through a preponderance of the evidence, that the officer acted properly. The act(s) alleged did take place but were lawful, proper, and in accordance with Departmental policy.
 - a. Example: a member of the public filed a complaint and alleged that an officer improperly arrested them. The investigation found that the complainant committed specific violations for which the officer arrested them, and so while the officer did arrest the complainant, it was determined to be lawful. An “exonerated” outcome for an allegation of improper arrest would be applied in this example.
5. **Withdrawn:** The complainant decided to withdraw their complaint of their own free will.

After the investigator determines the findings for each allegation, the investigator begins drafting the PC memo for the complaint.

Creation of the PC Memo

The Police Commissioner's Memorandum (PC Memo) is a comprehensive report that details the investigative steps taken, officer information, interview summaries, analysis of evidence, and the findings for each allegation. The PC memo serves as the investigative report for each IAD investigation. OPR Policy 21 details the procedures and format investigators must follow when drafting the PC memo; a sample PC memo with fictional information is included in the appendix as Appendix 5.

Structure of the PC Memo

ALLEGATION SECTION

- Summary of complaint and case info
- Involved officers

INVESTIGATIVE ANALYSIS SECTION

- Interviews
- Evidence

CONCLUSIONS SECTIONS

- Findings for allegations
- Signatures

ALLEGATION SECTION

- Basic information about complaint and complainant, including the date it was received and completed by IAD.
- Very brief summary of allegation(s).
- Accused officer information – name, rank, badge, payroll number, date of appointment, and assignment.
- Assigned IAD investigator information – name, rank, badge.
 - Sometimes the investigator gets reassigned in the middle of the investigation. This change would be noted here, with the name, rank, and badge number of the second investigator.

INVESTIGATIVE ANALYSIS SECTION

- Should the investigation exceed the 90-day limit for investigations, as mandated in the Mayor's Executive Order 05-17 (Appendix 6), a notation will be made in the first paragraph of this section. This sentence will state that all parties have been notified of

the delay and will explain the reason for the delay. The investigation period runs from the date the complaint was received to the date of completion listed on the PC memo. It is important to note that IAD has changed their policy recently – the deadline for conducting investigations is now 90 business days, as opposed to 90 calendar days.

- All investigative actions taken will be explained:
 - Contact attempts to the complainant are listed first.
 - If the complainant cannot be contacted/does not want to participate, the investigator will list a summary of their initial complaint.
 - If the complainant participates, the investigator includes a summary of the complainant's interview at IAD. The summary consists of a brief factual narrative of the incident.
 - Other investigative actions taken by the investigator, such as neighborhood surveys, medical records review, and other pertinent facts.
- Officer interview summaries:
 - Typically non-target (witness) officer interviews summaries are included next, followed by the target officer(s).
 - The dates of the officer interview and any re-interviews are included after the officer's information.
- Any additional relevant documents and investigative steps are listed and summarized after the officer interviews.
- According to OPR Policy 21, the Analysis section includes the narrative of the incident, highlighting inconsistencies, corroborations, denials, and other factors that address the issues of the case and support or refute the allegations. The policy states that the independence and credibility of witnesses and levels of cooperation should be addressed.

CONCLUSIONS SECTION

- The findings of the investigation will be outlined in the Conclusion. According to OPR Policy 21, each of the complainant's allegations should be individually identified and followed by a finding.
- Each finding is followed by a short explanation citing the basis for the finding.
- Departmental violations and/or any other misconduct that were not part of the original complaint, but were revealed during the investigation, will be included.
- The investigator prepares the conclusions, but an Inspector approves and signs.
- The Inspector can make recommendations here for policy reviews if needed, but this is rare.
 - For example, the investigation revealed an issue or gap in a PPD policy that an inspector recommends reevaluating.

PC Memo Review and Sign-Off Process

Once an investigator completes their investigation and PC memo, the PC memo is sent for review up the chain of command in the Police Department and members in different ranks sign off on the investigation and investigative conclusions.

All reviews are done using a paper case file. This requires a hard copy of the case file be delivered from Internal Affairs in Northeast Philadelphia to PPD Headquarters in Center City in order to be circulated among the various members of PPD leadership who must sign it.

An IAD investigation with sustained allegations currently receives reviews and signatures in the following order:

1. IAD Squad Captain
2. IAD Commanding Officer (Inspector)
3. Chief Inspector, Office of Professional Responsibility
4. Deputy Commissioner, Office of Professional Responsibility
5. Police Commissioner
6. Deputy Commissioner of Investigations

Cases with sustained allegations move to the disciplinary process at the Police Board of Inquiry. If no allegations of misconduct were sustained, the case file receives a different set of signatures through the chain of command and is then closed with no further steps taken.

CPOC Complaint Auditing Process

Auditors conduct every CAP audit by using a series of questions to gather facts about the complaint and the investigation, which helps them collect and track data about IAD investigations to assess for quality, thoroughness, and objectivity.

Auditing questions capture information about incidents and investigations, which allows Auditors to see how often IAD meets their investigation deadline of 90 business days, how long it takes for an IAD inspector to review/approve the investigations, demographic data on complainants, and more.

The Auditing, Policy, and Research Division conducted its first batch of audits with a spreadsheet of questions that the unit developed; we have since moved into a case management system, Sivil, which enables the unit to conduct data analysis on question responses more systematically and regularly. A screenshot of a portion of the data collection form in Sivil is included as Appendix 7.

The steps involved when auditing an IAD investigation into a complaint against police:

1. Reading the Police Commissioner's Memo, Index, and White Paper
2. Taking note of allegations made by the complainant
3. Taking note of all officer actions and if they possibly could be allegations/violations of PPD policies
4. Inputting facts about the complaint and investigation and answering audit questions to assess the quality of the investigation
5. Inputting all officers accused of misconduct and the allegations that IAD attached to them, as well as peripheral officers interviewed in the investigation

STEP 1: READING THE POLICE COMMISSIONER'S MEMO, INDEX, WHITE PAPER, AND CASE FILE

For every CAP investigation, IAD forwards to the Auditing, Policy, and Research Division the Police Commissioner (PC) Memo, Index, and White Paper.

These documents are explained in depth in the Internal Affairs section of this manual, but as a brief overview:

- **PC Memo:** A comprehensive document that records the steps taken in the IAD investigation and the investigation's conclusion.
- **Index:** The table of contents for the investigative file; it lists all documents and interview pages included in the investigative file.
- **White Paper:** The initial summary of the complaint completed by IAD staff before it is assigned and before any formal interviews occur. This page includes important details about how IAD classified the complaint and when it was assigned to an investigator.

Each PC Memo contains facts about the investigation that Auditors pull out and record in Sivil while completing their audit. Examples of facts pulled from the PC Memo include demographic information about the complainant, the date of the incident, and the police district where the incident occurred.

Auditors review the Index to determine whether the investigator obtained all relevant evidence in the investigation. If the investigator did not include a type of police report, or check for radio logs, these absences in the Index would be noted by Auditors.

Auditors review the White Paper to assess how PPD formally classified and subclassified the incident. As these classifications do not change in PPD's data system, it is important to review whether the most serious allegation present in the initial complaint was chosen as the classification on the White Paper. Lastly, Auditors review the entire case file and associated evidence such as audio and video files.

STEPS 2 & 3: TAKING NOTE OF ALLEGATIONS MADE BY THE COMPLAINANT & ALL OFFICER ACTIONS

An important evaluative component of audits involves comparing the allegations made by the complainant and victim(s) to the allegations included in the formal conclusion of the investigation.⁴ Any major discrepancies can indicate that allegations are missing, which prevents such allegations from being properly analyzed and potentially moving forward into the police disciplinary process.

Auditors review the complainant's description of the incident from their original complaint and the complainant's interviews, if applicable, as well any officer actions described in witness and officer interviews, to compare the allegations.

⁴ Office of Professional Responsibility Policy 21, Preparing IAD Reports.

STEP 4: INPUTTING FACTS AND ANSWERING AUDIT QUESTIONS TO ASSESS THE QUALITY OF THE INVESTIGATION

Auditors input initial information about the complaint and investigation, including the demographics of the complainant(s) and victim(s), the classifications given on the White Paper, and dates that track the investigation process. Next, Auditors answer questions used to evaluate the investigation and determine whether the investigator followed IAD policies. There are about 30 questions, such as:

- Do the officer interview summaries in the PC memo address all allegations raised by the complainant/victims?
- Does the PC memo indicate that the investigator checked for the existence of all potential audio recordings and video recordings, including BWCs?
- Were ALL allegations identified during the course of the investigation addressed on the conclusions page?

A full list of the audit questions that Auditors currently use will be included as Appendix 8.

STEP 5: INPUTTING ALL OFFICERS ACCUSED OF MISCONDUCT AND THEIR ALLEGATIONS, AS WELL AS WITNESS OFFICERS

Auditors log which officers were involved in each complaint. There are subject officers, who have allegations made against them, and witness officers, who do not have allegations against them but were involved in the incident. The PPD's roster of officers is embedded in Sivil, CPOC's case management system, so that Auditors may search an officer's payroll number and the rest of the officer's information is populated. Auditors also attach allegations to each officer from the PC Memo's conclusion page, if present. CPOC will periodically update the PPD roster when updated versions are provided by PPD; Auditors can also manually add officers if they do not appear in the roster, as well as unidentified officers classified as "unknown" in the investigation.

STEP 6: SENDING, RECEIVING, AND TRACKING FEEDBACK AFTER CONDUCTING AN AUDIT

Once the auditors have entered all relevant facts into Sivil, answered the audit questions, and indicated the officers involved, the next step is to draft a memo for submission to the IAD. In audits of complaints initiated by members of the public (CAPs), two types of memos may be generated after reviewing the audit: a "no feedback" memo or a "feedback" memo (Appendix 9). A "no feedback" memo indicates that the investigator's work was thorough enough to not require any changes. On the other hand, a "feedback" memo highlights areas where adjustments can be made to improve the quality, thoroughness, and objectivity of the investigation. Feedback memos follow the structure of the audit sections in Sivil, which includes: Timeliness, Professional Standard of Care, Evidence

Collection and Interviews, Conclusions and Case Dispositions, and Missing Allegations (if applicable). Once the feedback memo is completed, it is reviewed by the Director of the Auditing Policy and Research Division before being sent to IAD. The IAD will then assess the suggested changes and provide a response memo, explaining whether they accept or reject the feedback. Finally, auditors track all recommendations to record which recommendations are accepted by IAD and which updates are made to investigations based on feedback provided by CPOC.

CONCLUSION

The ultimate goals of auditing are to bring more transparency to the PPD Internal Affairs investigation process, pinpoint areas for improvement, enforce investigative best practices, and to build trust between the residents of Philadelphia and the investigators assigned to their complaints. This manual serves as a guide for the community to better understand both CPOC's work in auditing Internal Affairs investigations and the IAD investigation process itself.



Current Auditing Questions

Timeliness

Was the investigation completed in 90 business days?

If not, was an explanation provided in the PC memo?

Are significant caps in the investigation sufficiently explained?

Professional Standard of Care

Does the selected classification and subclassification most accurately fit the substance of the original complaint on the white paper?

Did the investigator make required attempts to identify, locate, and contact all civilian/non-PPD parties, including all potential witnesses? contact attempts will include e-mail, at least one documented telephone call, a 75-48 message with DC numbers, when location is within Philadelphia... as well as IAD form letters sent by certified and 1st class U.S. Mail." -OPR Policy 28

Did investigator exhaust all resources to identify the officers accused of misconduct?

Does the PC memo clearly articulate the incident that occurred and give the reader a clear picture of what happened?

Does any language in the PC memo come across as not neutral or as favoring one perspective over another?

Evidence Collections

Does the PC memo and index indicate the investigator checked for existence of all potential audio recordings and video recordings including BWC?

If applicable, did the investigator accurately summarize all audio and video recordings reviewed by CPOC?

If video recordings were included, were any additional allegations present in the footage that were not addressed in the PC memo?

If applicable, did the investigator obtain audio and/or video evidence while it was still available/before it got deleted?

If applicable, were medical records in the case file accurately summarized?

Do the PC memo and case index indicate the investigator identified, located, and collected all other foreseeable evidence related to the investigation (police documents, medical records, etc.)?

Are details of all OTHER evidence (PPD documents, other documents) in the case file accurately represented in the PC memo?

If applicable, did the investigator appropriately consider the independence of civilian witnesses and their testimony?

Interviews

Did the investigator complete a report documenting every interview conducted with an involved party? This includes all complainants, reporting parties, victims, witnesses, and accused members.

Did the investigator interview all PPD witnesses or explain why PPD witnesses were not interviewed?

Were any officers re-interviewed?

Do the officer interview memos address all of the allegations raised by the complainant?

Did the investigator ask appropriate follow-up questions in officer interviews?

Did the investigator ask appropriate follow-up questions in civilian interviews?

Do any of the interview memos (civilian or PPD) indicate the existence of additional evidence or witnesses that the investigator failed to obtain/contact?

Are all relevant details from interview memos included in the PC memo?

Conclusions and Case Dispositions

Are the allegation findings on the conclusions page logical and reasonable based on the analysis of the evidence presented in the PC memo?

Was the analysis on the conclusions page inclusive of all relevant evidence and information presented elsewhere in the PC memo and case file?

Did the PC memo include a clear and concise statement of applicable law, rule, or regulation, that was allegedly violated for each allegation?

If there are sustained allegations, did the investigation sustain ONLY administrative violations? (Administrative violations are those not raised by a complainant/victim, and relate to paperwork, BWC violations, radio usage, etc.)

Do case file materials indicate the allegations are listed against the correct officers?

Were ALL allegations and violations identified during the course of the investigation addressed on the conclusions page?

Select all allegations that were missing from the conclusions page (multi-select list).

OFFICE OF PROFESSIONAL RESPONSIBILITY
POLICY #8
Updated 06/01/2019

**SUBJECT: OPR CASE DISPOSITIONS/
INVESTIGATIVE FINDINGS**

I. PURPOSE: TO PROVIDE ESTABLISHED DEFINITIONS FOR THE FINAL DISPOSITION OF THE OFFICE OF PROFESSIONAL RESPONSIBILITY (OPR) INVESTIGATIONS.

II. POLICY:

- A. The following findings/dispositions have been established to describe the conclusion/ results of all Internal Affairs investigations, including Equal Employment Opportunity (EEO) and Investigative Support Services (ISS) investigations:
1. **SUSTAINED**: *AS AN INVESTIGATIVE FINDING*: The investigation demonstrates that the incident/infraction occurred and the action(s) alleged in the complaint were inconsistent with Departmental policy, directives, orders, and/or applicable local, state, or federal laws. *AS A DISPOSITION*: All investigative findings were *SUSTAINED*.
 2. **NOT SUSTAINED**: *AS AN INVESTIGATIVE FINDING*: A thorough investigation can neither prove nor disprove the incident/infraction alleged. *AS A DISPOSITION*: All investigative findings were *NOT SUSTAINED*.
 3. **UNFOUNDED**: *AS AN INVESTIGATIVE FINDING*: The investigation revealed that the incident/infraction alleged did not occur. *AS A DISPOSITION*: All investigative findings were *UNFOUNDED*.
 4. **EXONERATED**: *AS AN INVESTIGATIVE FINDING*: The investigation revealed through a preponderance of the evidence that the officer acted properly. The act(s) alleged did take place but were lawful, proper, and in accordance with Departmental policy. *AS A DISPOSITION*: All investigative findings were *EXONERATED*.
 5. **WITHDRAWN**: *AS AN INVESTIGATIVE FINDING*: The complainant decided to withdraw their complaint on his/her own free will.
 6. **DEPARTMENTAL VIOLATION**: *AS AN INVESTIGATIVE FINDING*: The investigation revealed infractions of Departmental rules, directives, or procedures ONLY. **This is used as a finding for EEO allegations, off duty action allegations, and use of force internal investigation allegations ONLY.*

7. **NO DEPARTMENTAL VIOLATION**: *AS AN INVESTIGATIVE FINDING*: The investigation revealed NO infractions of Departmental rules, directives, or procedures. **This is used as a finding for EEO allegations, off duty action allegations, and use of force allegations ONLY.*
8. **REFERRED**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: Internal Affairs has preliminarily conducted an investigation and that information has been referred to another IAD investigation number or another unit or agency (city, state, or federal) for further investigation.
9. **INACTIVE**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: The complainant will not consent to an IAD interview due to a pending court proceeding OR the officer is unavailable due to long term IOD status or military leave, etc, and the investigation will be reopened when the court proceedings are concluded or when the officer returns to duty or is able to be interviewed. This finding/disposition can only be used when compliant with OPR Policy #27. (Refer to [OPR Policy #27](#)).
10. **LACK OF COOPERATION**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: The complainant does not cooperate with the investigation and the investigator has made all reasonable efforts to obtain the cooperation, and the investigation cannot proceed further without the cooperation of the complainant. This finding/disposition can only be used when compliant with OPR Policy #28. (Refer to [OPR Policy #28](#).)
11. **WITHOUT MERIT**: *AS AN INVESTIGATIVE FINDING*: All the facts set forth in a complaint can be accepted as true in all respects and these facts disclose no improper behavior on the part of the officer. This finding/disposition can only be used when compliant with OPR Policy #26. (Refer to [OPR Policy #26](#).) *AS A DISPOSITION*: All investigative findings were *WITHOUT MERIT*.
12. **COMPLETE**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: A “first complaint” of lack of service or verbal abuse that is closed out after a Divisional Inspector conducted an investigation and gave the officer(s) advice, instructions, and other useful feedback regarding the complaint and the officer(s) actual or perceived behavior, demeanor, or conduct to assist the officer in avoiding similar complaints in the future.
13. **No I.A.D. Investigation**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: The incident does not require investigation by Internal Affairs and has been referred to an outside unit or agency, such as, a Unit/District C.O., Traffic Court, or Postal Inspector (Only to be used by Intake/Data Ctr Personnel with CO IAD approval).

14. **UNFOUNDED-Non EEO**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: The facts set forth in the original EEO complaint do not meet the criteria for an EEO complaint, making the EEO allegation unfounded. **This is used as a finding for EEO allegations ONLY.*
15. **CLOSED WITHOUT FINDINGS**: *AS AN INVESTIGATIVE FINDING AND OVERALL DISPOSITION*: This will only be used upon the approval of the Chief Inspector, Office of Professional Responsibility, or when the investigation conducted by F.B.I. PPCTF and the U.S. Department of Justice has declined prosecution, or the investigation revealed no criminal involvement of a target employee nor any Departmental Violations. Other factors that may be encountered by the PPCTF may also include, but are not limited to: the targeted employee(s) is no longer employed by the PPD, statements from persons originally identified as witnesses cannot be obtained, and/or available physical evidence may be insufficient. **This is used as a finding for ISS/FBI allegations ONLY.*

B. While the above definitions refer to the overall **DISPOSITION** when the individual allegations involve either/both multiple findings and multiple employees. In order to simplify terms when referring to these more complex cases, the definitions below will be used.

1. **PARTIALLY SUSTAINED**: There are several allegations made against an individual officer and one or more allegations are SUSTAINED, but not all the allegations are SUSTAINED. In this finding **there is only (1) one officer/employee** involved and (1) or more of the total allegations are SUSTAINED and all other allegations are other than sustained.
2. **MULTIPLE FINDINGS**: More than one officer is involved and the allegations are SUSTAINED against one or more officers; ALL other allegations will be UNFOUNDED, NOT SUSTAINED, or officers may be EXONERATED. In this finding **there is always more than (1) one officer/employee** involved with multiple allegations where at least (1) allegation or more is SUSTAINED and all other allegations are other than sustained.
**Note: if there are more than (1) officer/employee involved and ALL of the allegations are SUSTAINED than the overall disposition is SUSTAINED.
3. **SEVERAL FINDINGS**: There are one or more officers involved in the incident and all of the allegations are either NOT SUSTAINED, UNFOUNDED, or some officers are EXONERATED. In this finding, **there are always multiple allegations AND differing findings**, however, none of those findings are sustained.
**Note: if there are more than (1) officer/employee(s) involved and ALL of the allegations are the same than the overall disposition is the same. IE: 2 officers/employees with 4 allegations and all are UNFOUNDED, the overall finding is UNFOUNDED.

EXECUTIVE ORDER NO. 5-17

PROCESSING OF CIVILIAN COMPLAINTS ALLEGING POLICE MISCONDUCT

WHEREAS, issues relating to public safety are of primary concern to all civilians of the City of Philadelphia;

WHEREAS, it is incumbent upon the government of the City of Philadelphia to ensure that agencies directly responsible for public safety have the proper support from the government and its agencies; and that all civilians have an equal degree of faith in those agencies to deal with their complaints in a fair, equitable and timely manner;

WHEREAS, Executive Orders 1-80, 9-93 and 7-11 established procedures for the prompt and impartial processing of complaints against the Police Department;

WHEREAS, there is a need to broaden and codify the procedures by which civilians of the City of Philadelphia can seek redress of grievances against members of the Police Department and the Police Department can investigate police misconduct;

WHEREAS, the President's Task Force on 21st Century Policing and the United State Department of Justice, through its report entitled, *Collaborative Reform Initiative: An Assessment of Deadly Force Policy and Practice in the Philadelphia Police Department*, both recommend that law enforcement agencies should establish and maintain a culture of transparency and accountability to build public trust and legitimacy;

WEREAS, the City hopes to improve public access to civilian complaint data in a form most accessible to the general public without compromising confidentiality of the parties involved and hindering or otherwise impeding the operations and resources of the Philadelphia Police Department;

WHEREAS, the prompt response to, effective investigation of, and impartial resolution of civilian complaints of police misconduct are essential to the trust that society places in its police;

WHEREAS, numerous complaints of police misconduct have been made by civilians against some members of the Philadelphia Police Department;

WHEREAS, it is the intention of this Executive Order to preserve the autonomy of the Police Commissioner's exercise of duties, while mandating procedures equitable to both civilians and police personnel for resolving civilian complaints of police misconduct.

NOW THEREFORE, by the power vested in me in accordance with Section 3-100(h) of the Philadelphia Home Rule Charter, the following amended guidelines for the processing of complaints of police misconduct by members of the Philadelphia Police Department, and the study, review, and disposition of said complaints, are hereby ordered.

SECTION 1. CIVILIAN COMPLAINTS

- a. All civilian complaints against a police officer ("CCR") shall be received, investigated, and disposed of in accordance with the procedures set forth herein, and complainants shall be notified of actions taken by the Police Commissioner.
- b. A CCR shall be distinguishable from an independent internal investigation initiated from within the Department. For purposes of this Order, a CCR and the subsequent investigation shall only include those complaints originated by one or more civilians, whereby the Department has not otherwise initiated an independent internal investigation. In the event a CCR, or portion thereof, is or becomes the subject of a separate internal investigation, the CCR shall be merged into the internal investigation and shall be classified as an internal investigation and the complainant shall be notified.
- c. Copies of complaint forms entitled "Civilian's Complaint Report," published in English, Spanish, Chinese, Vietnamese, and other language versions as shall be necessary to provide broad and inclusive access to this complaint procedure, shall be made available via the Philadelphia Police Department website and supplied in sufficient quantities to all police districts and units, the Philadelphia Commission on Human Relations, the Police Advisory Commission, (each a "receiving agency"), the District Attorney's Office, and any community-based organization upon request. Complainants may submit completed forms to any of these offices or agencies.

Each of the receiving agencies shall maintain a control log to track the number of forms provided to complainants and collected, as set forth in subsection d of this Section 1. The District Attorney's office is requested to maintain such records as it deems necessary of such CCRs. Interpreters and persons with needed literacy skills shall be made available, as provided in Philadelphia Police Directive No. 7.7 regarding access to police services for individuals with limited English language proficiency, as needed, throughout the complaint and investigation process. Such persons shall not be sworn currently employed police officers.

- d. The CCR form shall contain a statement to the effect that the filing of a complaint will not necessarily result in a criminal investigation, but that an Internal Police Investigation will be initiated. The CCR form shall also include the address and telephone number of the Internal Affairs Division, and a summary of the procedures and timetable established by this Order for the conduct of investigations and notification to the complainant. Each complainant shall receive a copy of the CCR at the time it is filed with the receiving agency. Not later than twenty-four (24) hours after the CCR is filed with the receiving agency, the said agency shall send a copy of the CCR to the Police Department (if received by an agency outside the Department) and to the District Attorney's Office. If a CCR is received by the District Attorney's Office, that office is requested to forward it promptly to the Police Department.

The control log maintained by the receiving agency shall show the name of the complainant (except in the case of anonymous CCRs), the date and time the CCR form was received from the complainant, and whether the complainant left the form with the receiving agency to be officially filed. The log shall not show the name, badge number, or other descriptive information relating to any police officer(s) complained of. The Police Department shall keep a master file of all forms received and the offices or agencies from which they were received. Such control logs and master list shall be available for viewing by the public, subject to redaction as provided in Section 11(a)(4).

- e. The Internal Affairs Division of the Police Department shall be designated as the central control agency for all cases of civilian complaints against members of the Police Department.
- f. Police Department personnel shall inform any person who wishes to make a complaint against a police officer of the existence of the formal complaint procedure established by this Executive Order and shall refer such persons to the various locations, including the nearest location, where the CCR may be obtained and filed.
 - 1. Police Department personnel shall accept anonymous CCRs and in such cases shall follow the procedures in Section 3 of this Order.
 - 2. Police Department personnel shall provide a CCR to anyone requesting such forms, without requesting or requiring identification.
 - 3. When dealing with a possible complainant, Police Department personnel shall maintain a professional demeanor and take no actions to intimidate, coerce or otherwise dissuade a complainant from submitting a CCR.
- g. The Police Department shall promulgate specific procedures for the recording and processing of CCRs against members of the Police Department in accordance with this Executive Order by its effective date. The Police Department shall also prepare, publish and distribute CCRs in accordance with this Executive Order by its effective date.

SECTION 2. PROCEDURES FOR THE INVESTIGATION OF COMPLAINTS

- a. All CCRs concerning police misconduct which are filed shall be received, investigated, and disposed of in accordance with the procedures set forth in this Section 2, except as provided in Sections 4 (relating to Complaints Lacking Any Merit), 5 (relating to Traffic or Parking Citation Complaints), 6 (relating to Right to Know Complaints), 7 (relating to Verbal Abuse or Lack of Service Complaints) and 8 (relating to Priority of Criminal Investigations) of this Executive Order.
- b. Upon receipt of the CCR, the Commanding Officer of Internal Affairs shall promptly assign it for investigation to a member of Internal Affairs, who shall be responsible for the investigation of the alleged incident. All such investigations shall be initiated by, and insofar as practicable, carried out by the staff of Internal Affairs. The staff of Internal Affairs shall have direct responsibility for all such investigations. No such CCR shall be referred for investigation to the commanding officer of the police officer against whom the CCR has been lodged, or to any other officer of the same command; provided however, that Internal Affairs may refer certain verbal abuse or lack of service complaints to the Inspector of the unit to which the accused officer is attached, where appropriate pursuant to Section 7 hereof. Internal Affairs shall monitor and review such investigations and, where necessary, take appropriate action.
- c. The investigation of the CCR by Internal Affairs shall include, but not be limited to, the following:
 - 1. Interviews with the complaining witness, the alleged victim of police misconduct (if other than the complaining witness), and all other witnesses to the incident who are indicated on the CCR form:
 - 2. Interviews with the police officer(s) against whom the CCR is lodged and all

- other police officers witnessing or involved in the alleged incident;
3. Interviews with all other witnesses to the alleged incident who become known to the investigating officer as a result of the investigation:
 4. Examination of the scene of the alleged incident, when appropriate:
 5. Viewing, analysis, and preservation of any and all evidence submitted by the complainant or witnesses or otherwise discovered during the investigation including, but not limited to, photographs, video recordings, medical records, and any reports of property damage:
 6. The gathering of all pertinent Police Department forms, analyses, technical reports, laboratory results, tapes and transcripts of telephone calls, and radio transmissions;
 7. If a criminal complaint has been lodged against any witness or participant in the event, a review and analysis of the investigative file compiled by the Police Department and/or the District Attorney's Office in connection with such criminal complaint, when available;
 8. Such other investigative steps as may appear appropriate in the discretion of the assigned investigator, whose responsibility it shall be to record each step in the investigation and the result thereof in an Investigation Report.
- d. The assigned investigator shall attempt to secure written statements from all participants in, and witnesses to, the alleged incident, but where any witness or participant is unwilling to make a signed written statement, the assigned investigator shall provide a summary of the oral statement, if any, provided by such participant or witness. Where a written statement is given and signed by a participant or witness, the assigned investigator shall provide the person making the statement with a copy.
 - e. When a complainant is unable to identify the police officer against whom a complaint is lodged by name or badge number, the assigned investigator shall make every effort to assist the complainant in making a positive identification of the police officer.
 - f. All investigations shall be completed by Internal Affairs and the Investigation Report prepared within ninety (90) days from the date of filing of the CCR, except for extenuating circumstances stated in the Investigation Report and approved by the Police Commissioner or the Commanding Officer of Internal Affairs. The Investigation Report shall include the written recommendation of the investigator regarding the validity of the CCR.
 - g. Within thirty (30) days of the completion of an investigation, the ranking officer of Internal Affairs shall review the Investigation Report and upon giving approval thereof forward the Investigation Report, the entire investigation file and the ranking officer's written conclusion as to the occurrence and nature of the misconduct, if any, to the Police Commissioner. If the Investigation Report is disapproved by the ranking officer of Internal Affairs it will be revised accordingly and resubmitted to such ranking officer until it receives approval.
 - h. If extenuating circumstances necessitate an extension of time, the complainant (as well as the accused police officer) shall be notified of this fact and the reason therefor.

SECTION 3. ANONYMOUS COMPLAINTS

- a. When a member of the Police Department is approached by a complainant wishing to make an anonymous complaint concerning allegations of misconduct, the individual receiving the complaint shall notify the anonymous complainant that it is in the best interest of a full and complete investigation for the complainant to be identified and interviewed by the assigned investigator.
- b. If the anonymous complainant nevertheless wishes to remain anonymous, the individual receiving the complaint shall attempt to elicit all facts which the complainant can provide and shall record and process the CCR pursuant to Section 2 hereof, to the extent possible.

SECTION 4. COMPLAINTS LACKING ANY MERIT

If the assigned investigator of Internal Affairs, with the agreement of the ranking officer of the Internal Affairs Division, determines that the facts stated in the CCR, if accepted as true in all respects and interpreted in the light most favorable to the complainant or the alleged victim of police misconduct (if other than the complainant), disclose no improper behavior on part of the police officer against whom the CCR is lodged, the ranking officer of the Internal Affairs Division may terminate the investigation. The Police Commissioner shall cause notice of the determination to be given to the complainant and to the alleged victim of the misconduct (if other than the complainant), or to the representative designated in the CCR.

SECTION 5. TRAFFIC OR PARKING CITATION COMPLAINTS

If the assigned investigator of Internal Affairs, with the agreement of the ranking officer of the Internal Affairs Division, determines that a CCR concerns the issuance of a traffic or parking citation, and the facts stated in the CCR, if accepted as true in all respects and interpreted in the light most favorable to the complainant or the alleged victim of police misconduct, disclose no improper behavior on the part of the officer against whom the CCR was lodged, the ranking officer of the Internal Affairs Division may terminate the investigation. The Police Commissioner shall cause notice of the determination to be given to the complainant with instructions that the proper procedure to dispute a traffic or parking violation is to appeal the citation to the appropriate forum as indicated on the complainant's copy of the citation. If any improper behavior on part of the police officer is disclosed, the CCR will be investigated according to Section 2 of this Executive Order.

SECTION 6. RIGHT-TO-KNOW COMPLAINTS (65 P.S. § 67.101, *et seq.*)

If the assigned investigator of Internal Affairs, with the agreement of the ranking officer of the Internal Affairs Division, determines that a CCR concerns the denial of or the delay in responding to a Right-to-Know request authorized under Pennsylvania law, and the facts stated in the CCR, if accepted as true in all respects and interpreted in the light most favorable to the complainant, disclose no improper behavior on the part of the officer against whom the CCR was lodged, the ranking officer of the Internal Affairs Division may terminate the investigation. The Police Commissioner shall cause notice of the determination to be given to the complainant with instructions that the proper procedure to appeal Right-to-Know disputes is to appeal the Philadelphia Police Department's response, or lack thereof, to the appropriate forum as indicated in the Pennsylvania Right-to-Know Law, 65 P.S. § 67.1101. If any improper behavior on part of the police officer is disclosed, the CCR will be investigated according to Section 2 of this Executive Order.

SECTION 7. VERBAL ABUSE OR LACK OF SERVICE COMPLAINTS

- a. If the assigned investigator of Internal Affairs, with the agreement of the ranking officer of the Internal Affairs Division, determines that the facts stated in the CCR, if accepted as true in all respects and interpreted in the light most favorable to the complainant or the alleged victim of police misconduct (if other than the complainant), would constitute verbal abuse or lack of service only, and that it is the "first complaint" of such conduct against the officer(s) named, the ranking officer of the Internal Affairs Division shall refer the CCR to the Inspector of the officer against whom the CCR was lodged.

The goal of the Inspector's investigation shall be to remedy the actual or perceived offensive behavior of the police officer against whom a CCR has been lodged in the most efficient and prompt manner possible. To accomplish this goal, the Police Department shall be prohibited from taking any formal disciplinary action against a police officer for the "first complaint" received for verbal abuse or lack of service in a two (2) year period.

- b. For purposes of this Order, the assigned Internal Affairs investigator shall determine the "first complaint" status by reviewing the Internal Affairs history of the officer during the two (2) years prior to the date of current CCR. If an officer has any CCRs alleging verbal abuse or lack of service during this time period, the current CCR shall be deemed a second or subsequent complaint and shall be investigated and disposed of pursuant to Section 2 of this Executive Order, including possible discipline.

Prior to the execution of this Executive Order, the Police Department has implemented appropriate policies and procedures to ensure that officers subject to allegations of verbal abuse or lack of service receive an in-depth review and such advice, instructions and other useful feedback regarding the complaint as will enable them to avoid similar complaints in the future.

- c. The procedures for disposition of such "first complaints" shall be the following:
 1. Upon receipt of a CCR from the ranking officer of the Internal Affairs Division, the Inspector of the police officer against whom the CCR was lodged shall contact and interview the complainant, and the complainant's witnesses, if possible, to confirm the facts of the case.
 - i. If the Inspector determines in the initial investigation that any aspect of the CCR exceeds the scope of verbal abuse or lack of service, the CCR shall be referred back to Internal Affairs to be investigated and disposed of pursuant to Section 2 of this Executive Order. Additionally, if upon review the Inspector determines that the CCR states a claim of verbal abuse or lack of service motivated by animus based on race, color, gender, religion, national origin, age, ancestry, sexual orientation, disability or gender identity, the CCR shall be referred back to Internal Affairs to be investigated and disposed of pursuant to Section 2 of this Executive Order.
 2. The Inspector shall schedule a meeting with the police officer, his or her commanding officer and any other persons the Inspector deems necessary, to discuss the facts of the CCR. At such meeting the officer will be able to convey his or her version of the incident.

3. At the conclusion of the meeting, the Inspector shall provide the officer with his or her opinion of the incident and the alleged conduct of the police officer. The Inspector shall then offer his or her advice, instructions and other useful feedback regarding the CCR and the officer's actual or perceived behavior, demeanor or conduct, so as to assist the officer in avoiding any similar CCRs in the future.
 4. The complainant shall be notified in writing that a meeting was held with the police officer against whom the CCR was lodged, at which the officer's conduct was discussed, and the case will be closed out.
- d. Second or subsequent CCRs alleging verbal abuse or lack of service against the same officer within the two (2) year period following the date of the complaint amounting to verbal abuse or lack of service as set forth above shall be investigated and disposed of pursuant to Section 2 of this Executive Order, including possible discipline.

SECTION 8. PRIORITY OF CRIMINAL INVESTIGATIONS

- a. In the event that the complainant or alleged victim of police misconduct (if other than the complainant) has been arrested and charged with a criminal offense or offenses based upon the events on which the CCR is founded, the investigation and disposition of the CCR shall conform to the procedures established in this Order. However, the complainant or the alleged victim of police misconduct may elect not to give a written or oral statement either to the assigned investigator or before the Police Board of Inquiry, or both, until final disposition, including appeal, of all such criminal charges. In the event of such an election, the investigation shall remain open until such criminal charges have reached a final disposition, including appeal, and a new opportunity has been given to the complainant or alleged victim to make such a statement.
- b. In the event that a prosecutorial agency notifies the Police Commissioner that the officer who is the subject of the CCR is under criminal investigation for the offense complained of in the CCR, or in the event that a police officer is arrested for the offense complained of in the CCR, the investigation and disposition of the CCR shall conform to the procedures established by this Order. Where criminal charges are not resolved or the criminal investigation is not complete prior to the Commissioner or his appointed delegate's final determination of the CCR, the Commissioner shall reevaluate such final determination within fifteen (15) days of the resolution of the criminal charges or the closing of the criminal investigation. A criminal investigation shall be deemed closed upon written notice from the prosecutorial agency. The Commissioner may affirm, modify or reverse the prior determination in light of the outcome of the criminal charges or criminal investigation, or may reopen the departmental investigation which shall conform to the procedures set forth in this Executive Order. A brief statement by the Commissioner supporting the decision upon reevaluation shall be transmitted to the complainant or alleged victim of police misconduct (if other than the complainant), in the manner prescribed by Section 9(d) hereof.
- c. If the initiation or completion of an investigation is delayed due to possible or pending criminal charges as detailed in Sections 8(a) or (b) hereof, the time period mandated by this Executive Order for the completion and disposition of the investigation may be extended for the period of the delay.

SECTION 9. REVIEW AND DISPOSITION OF COMPLAINTS

Except for those CCRs handled solely pursuant to the provisions of Sections 4 (relating to Complaints Lacking Any Merit), 5 (relating to Traffic or Parking Citation Complaints), 6 (relating to Right to Know Complaints), or 7 (relating to Verbal Abuse or Lack of Service Complaints), and not the provisions of Section 2, upon receipt of the file and the findings and conclusions of the ranking officer of the Internal Affairs Division, the Police Commissioner or a Deputy Commissioner assigned by the Commissioner shall review the entire file and determine the appropriate disposition of the CCR in accordance with the following provisions:

a. Criminal Misconduct.

In every case in which the Commissioner or his appointed delegate determines that there are reasonable grounds to believe that misconduct rising to the level of a crime has occurred, without regard to any person's credibility, the Commissioner shall refer the matter to the District Attorney or the U.S. Attorney for consideration and prosecution unless prosecution has been previously initiated. Whether misconduct rises to the level of a crime shall be determined by reference to the Pennsylvania Crimes Code, Federal criminal statutes, and or regulations. Regardless of whether the District Attorney or U.S. Attorney initiates or declines prosecution, the Commissioner or his appointed delegate shall impose such sanctions as the Commissioner deems appropriate.

b. Non-Criminal Misconduct.

In every case in which the Police Commissioner or his appointed delegate determines that there are no reasonable grounds to believe that misconduct rising to the level of a crime has occurred, the Commissioner shall, in his discretion, (i) make a finding that noncriminal misconduct has occurred, and impose such sanctions as the Commissioner shall deem appropriate; (ii) refer the CCR to the Police Board of Inquiry for a hearing; or (iii) make a finding that no misconduct has occurred and close the file.

c. Disciplinary Action.

In every case in which the Police Commissioner or his appointed delegate determines that misconduct has occurred, the Commissioner shall impose sanctions which are commensurate with the seriousness of the misconduct, taking into account the prior history of the officer in question. Sanctions shall range from a reprimand to dismissal from service.

d. Notice

The disposition of the CCR, including any disciplinary action, shall be communicated in writing, by certified mail, to the officer against whom the CCR was lodged, the complainant and the alleged victim of police misconduct (if other than the complainant), or such person's representative as may be designated in the CCR; and a copy shall be delivered to the District Attorney's Office. The notification shall inform the person to whom it is given that the entire file is available for review, subject to redaction in accordance with Section 11(a)(4).

e. Except for extenuating circumstances stated in the file, the determination of the Police Commissioner and the notice prescribed in Section 9(d) shall be made within forty-five (45) days from the receipt of the file by the Police Commissioner.

- f. In those instances in which the Police Commissioner determines that no misconduct has occurred, the notice to the complainant and the alleged victim (if other than the complainant) shall include a summary of the investigative findings and the reason for the Police Commissioner's actions.

SECTION 10. THE POLICE BOARD OF INQUIRY

- a. Upon referral by the Commissioner of a CCR to the Police Board of Inquiry (the "Board") for hearing, the following procedures shall apply:

The Board shall schedule a hearing to be held at the earliest possible date, but not to exceed ninety (90) days from the referral of the CCR ("Civilian Complaint Hearing"). Not less than thirty (30) days' written notice of the time and place of the hearing shall be given by certified mail, return receipt requested, to the complainant and the alleged victim of police misconduct (if other than the complainant) or to his or her attorney or other representative designated in the CCR: to material witnesses identified in the investigation; to the police officer or employee charged with misconduct; and to all witnesses and participants whom the Commissioner or the Board believes may be helpful in resolving the question before the Board.

- b. The Board may grant a continuance of the scheduled hearing only upon written request by a member of the Board or the Department Advocate. If a continuance is granted, the hearing will be rescheduled to be held at the earliest date possible but not to exceed thirty (30) days from the date of the first scheduled hearing, and notice shall be given to the accused officer or employee and any witnesses by certified mail, return receipt requested.
- c. Hearings shall be informal and strict rules of evidence shall not apply. The assigned investigator and any officer or employee against whom charges have been placed shall attend. Testimony under oath shall be received from all persons who appear and purport to have information which is material to the CCR. Any accused Police Department officer or employee may be represented by counsel or other representative and shall have the right to present evidence and to examine and cross examine witnesses. An audio recording and transcript of the hearing shall be made. For those hearings that are open to the public, such transcripts shall be made available to the public upon request and payment of cost. All Civilian Complaint Hearings, shall be open to the public provided that hearings that involve minor victims or allegations of sexual misconduct shall not be open to the public unless a public hearing is requested by the victim in writing. If the victim is a minor, the hearing shall not be open to the public unless the written consent of a parent with legal custody or the minor's legal guardian is also provided.
- d. The Board shall forward to the Police Commissioner or to the Commissioner's appointed delegate written findings of ultimate facts based on all of the evidence presented at the hearing. If the Board finds that a police officer engaged in misconduct, it shall also make a recommendation for disciplinary action against the police officer. If the Board finds that misconduct rising to the level of a crime has occurred, determined by reference to the Pennsylvania Crimes Code, federal statutes or regulations, it shall refer the matter to the District Attorney or the U.S. Attorney for consideration of prosecution, unless prosecution has been previously initiated. A copy of the Board's findings and recommendations, if any, shall be kept on file by the Department Advocate.
- e. Upon consideration of the Board's findings and recommendation, if any, the Police Commissioner shall make a final determination of the CCR, which, together with a brief statement of reasons in support of or in disagreement with the findings and recommendations of the Board, shall be transmitted to the appropriate parties, in the manner provided by Section 9(d) hereof.

SECTION 11. PUBLIC ACCESS TO AND MAINTENANCE OF RECORDS

Records relating to or resulting in criminal investigations and records relating to a non-criminal investigation are exempt from public disclosure pursuant to the Pennsylvania Right to Know Law (65 P.S. §67.708(16) and (17)). Therefore, public access to and maintenance of these records shall be governed by this Order.

- a. General procedure following the disposition of a CCR.
 1. Redacted copies, as defined in subparagraph 4 below, of the complete investigation, the written findings and recommendations of the Board, if any, and the Police Commissioner's final determination shall be given by certified mail, return receipt requested, or other such manner as requested, to the Complainant or authorized representative, and victim if other than the complainant, within forty-five (45) days of the Police Commissioner's final determination.
 2. To ensure openness and transparency, on a monthly basis, the Police Department shall post on the Department's website the relevant identifying information, classifications and outcomes in a format consistent with the Open Data Philly Initiative. This posting shall include a brief narrative of the complaint, investigation, investigative outcome, Police Board of Inquiry determinations. Relevant identifying information shall include district, complaint classification, finding, and reference numbers, and any other information determined by the Commissioner or his designee to be appropriate, but no portion of the posting shall include information removed from redacted copies of CCR records pursuant to subparagraph 4 below. All information posted on the Department's website shall be maintained on the website for a period of five (5) years beyond the calendar year of the disposition of the CCR.
 3. The officer against whom CCR is lodged shall receive notification of the outcome of any CCR and upon request will be provided an entire, completed CCR investigative file.
 4. For purposes of this Order, a "redacted copy" of any record is a record whereby certain personal information, medical/treatment information, and information that would compromise public safety or officer safety has been obscured, masked, or otherwise concealed from view. Such information shall include, but is not limited to, the following information:

A. Personal Information Redactions:

1. First and last names of complainants, witnesses, victims and Police Officers, except for initials.
2. Other names that could be used to identify witness or officers.
3. Unique information which could identify a witness or officer.
4. Home addresses or other specific non-business addresses.
5. License plate numbers and vehicle identification numbers.
6. Social Security Numbers.
7. Driver's license numbers.
8. Certified mail numbers.
9. Actual birth dates (age is acceptable).
10. District Control numbers.
11. Property receipt numbers.
12. Warrant numbers
13. Ticket or citation numbers.
14. Firearms serial numbers.

B. Public/Police Officer Safety Information Redactions:

1. Undercover and otherwise sensitive officer assignments.
2. Police Department assigned vehicle numbers, license numbers and vehicle identification numbers (VIN).
3. Officer payroll numbers.
4. Officer shift hours.
5. Location or lack of surveillance cameras in an area.
6. Information regarding police tactics that would endanger officer or public safety if released.
7. Any other portion of the investigative file that the Police Commissioner determines must be kept confidential in order to protect the integrity of the investigative process.

C. Medical, psychiatric and other confidential information.

In order to protect the privacy interest of all parties involved in the investigations, records or information obtained in the course of an investigation which would operate to prejudice or impair a person's reputation or security shall not be included in the investigative report or made available to the complainant or public under this section. Such information includes but is not limited to the following:

1. Medical information.
2. Psychiatric information
3. Drug and alcohol treatment information
4. Information supplied to police with the express expectation of confidentiality or anonymity.
5. Any other portion of an investigative file that the Police Commissioner determines must be kept confidential in order to protect the integrity of the investigative process.

b. Procedures when a CCR is being reviewed by any prosecutorial agency.

1. The Police Department shall provide a copy of the entire, completed civilian's complainant investigative file to any local, state or federal prosecutorial agency within seventy-two (72) hours following receipt of a written request from the agency.

- a. Ongoing Investigations

- During the investigation of any CCR and upon receipt of a written request from any local, state or federal prosecutorial agency, the assigned police department investigator shall provide to the prosecutorial agency any requested information within twenty-four (24) hours after receipt of the request.

1. If the incident which is subject of the CCR has resulted in a criminal investigation conducted by a prosecutorial agency or a criminal prosecution for any of the parties, the record of the complaint shall not be posted on the Departmental website until such time as the criminal charges have been resolved by verdict in the trial court or the prosecutorial agencies involved in the investigation have notified the Police Commissioner that the criminal investigation is closed. However, upon request, records will be provided to any other prosecutorial agency, the police officer against whom the CCR is lodged, the complainant, and the victim, if other than the complainant.

- c. Procedures involving anonymous CCRs.

- The records of anonymous CCRs received pursuant to Section 3(b) above, including those for which an investigation has found no corroboration of the complainant's version of the facts shall be posted on the Departmental website as described in Section 11(a)(2) above. However, records will be provided, upon request, to the complainant, if later identified, and the victim, if other than the complainant, pursuant to Section 11(a)(1).

- d. Procedures involving verbal abuse or lack of service CCRs.

- The records of "first complaints" of verbal abuse or lack of service received pursuant to Section 7 shall be posted on the Departmental website as described in Section 11(a)(2) above and the disposition shall be recorded as "Officer Counseled."

- e. A copy of the final determination of the Police Commissioner shall be placed in the personnel file of the officer or officers involved, together with the findings and recommendations of the Board, if any. In those instances in which a CCR is terminated prior to a hearing, a copy of the CCR and final determination of the Police Commissioner shall be placed in the personnel file of the officer or officers involved.

SECTION 12. The procedures provided in this Executive Order shall be in addition to and not in derogation of:

- a. The procedures provided for preservation of the rights of police officers pursuant to the Civil Service Regulations of the City of Philadelphia; and
 - b. The responsibility of the Police Department to investigate crimes or refer cases to the proper authorities.

SECTION 13. If any section of this Order is declared to be unconstitutional or illegal, the remaining sections shall remain valid and unaffected.

SECTION 14. Executive Order No. 7-11 is hereby rescinded.

SECTION 15. This Executive Order shall be effective in sixty (60) days, provided that all preparatory steps, including those set forth in Section 1(f), shall begin immediately.

8/1/17
DATE

James F. Kenney
JAMES F. KENNEY, MAYOR



CPOC

Citizens Police
Oversight Commission

CITY OF PHILADELPHIA