

# Addressing Citizen Complaints about Police: A Proposal for Change

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March 2001



Office of the City Auditor  
Portland, Oregon



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CITY OF  
**PORTLAND, OREGON**

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March 15, 2001

TO: Vera Katz, Mayor  
Jim Francesconi, Commissioner  
Charlie Hales, Commissioner  
Dan Saltzman, Commissioner  
Erik Sten, Commissioner  
Mark Kroeker, Chief of Police

SUBJECT: Report on the City's process for handling complaints about alleged police misconduct

Attached is Report #282, a study of the City's process for handling complaints about alleged police misconduct. The study was conducted at the request of the City Council, and was not included on our annual Audit Schedule published in February of 2000.

We appreciate the cooperation and assistance we received from staff in the Police Bureau, the Mayor's and other Commissioner's Offices, and members of the public in conducting and preparing the report.

  
GARY BLACKMER  
City Auditor

Audit Team: Richard Tracy  
Ken Gavette  
Kathleen Taylor

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# Study Results

**Purpose of this report** The City of Portland is widely recognized as having a relatively effective police oversight system. Experts we spoke with and literature we reviewed indicated that Portland's Police Internal Investigation Auditing Committee (PIIAC) is one of the better police oversight systems in the country. Nevertheless, the City Council and the community have raised a number of concerns about the effectiveness of the current system for handling citizen complaints about police misconduct. At a January 11, 2001 hearing, the City Council asked the City Auditor to study oversight systems in other cities, review the recommendations of the 2000 PIIAC Work Group, and to propose changes to strengthen our police complaint system.

This report was not conducted in accordance with generally accepted government auditing standards. Effective January 2001, PIIAC became part of the Office of the City Auditor, and as a result the Auditor is not organizationally independent as required by standards. However, we took due professional care in conducting interviews, obtaining evidence, and analyzing the literature. Conclusions and recommendations are based on our best professional judgment.

**Methodology** To conduct this study we reviewed literature and relevant publications, interviewed experts and knowledgeable parties, visited three cities with highly regarded oversight systems, and followed up on the status of recommendations from previous audit work.

We reviewed two PIIAC Work Group reports issued in October of 2000. These reports proposed two approaches for changing the current oversight process. We listened to public testimony regarding these reports on January 17, 2001. We interviewed eight Work Group members from both the majority and minority positions. We also reviewed available interviews and notes used by the Work Group members to draft their reports.

We interviewed four nationally known experts in the field of police work and oversight systems. Our interviews included Dr. Samuel Walker, University of Nebraska at Omaha, Dr. Robert Worden, New York University at Albany, Dr. Richard Terrill, Georgia State University, and Dr. Ken Adams, Indiana University.

We reviewed available professional literature on oversight systems, as well as numerous newspaper articles on specific systems from around the country.

The City Auditor and one staff member visited the cities of Minneapolis, San Francisco and San Jose. These three cities are widely reported as having effective police oversight systems. In each city we interviewed the director of the program and representatives from the local police agency. To gauge public sentiment toward the systems, we also interviewed in person, or by phone, community representatives from local civil rights organizations or copwatch groups.

Finally, we conducted a detailed follow-up of recommendations contained in our 1993 audit report *Portland's Systems for Handling Citizen Complaints About Police Misconduct Can Be Improved*. Over a three week period, staff from Audit Services reviewed internal control systems in the Internal Affairs Division of the Police Bureau to determine actions taken to address weaknesses in case management methods and the Early Warning System.

**No conclusive evidence that civilian oversight improves police behavior or citizen satisfaction**

Our review of literature and interviews with experts found that there is little evidence to support the contention that any particular system of police oversight is more effective than another.

We asked Task Force members and national experts for empirical evidence to support the assertion that civilian review boards are effective deterrents to police misconduct, but found that convincing empirical evidence is lacking or inconclusive. A recent report published in the *Journal of Criminal Justice* concluded that the positive effects of review boards is “not supported by the data.” The researchers found that the variable with the most influence on police behavior is the average age of the police force. That is, younger police forces have more complaints than older police forces.

In addition, a detailed study of police accountability in fourteen large U.S. cities by the Human Rights Watch organization found that police misconduct “is persistent” in all cities, and that complainants face “enormous barriers” regardless of the type of oversight employed. They report that “efforts to make meaningful reforms have fallen short”

despite claims to the contrary. The City of Portland, along with Minneapolis, is mentioned as having relatively effective, though “imperfect” oversight systems.

The Human Rights Watch Report also found that cities had common shortcomings in recruitment and training of police officers, and in using historical data to identify officers with multiple complaints. The report contained specific examples of police misconduct involving officers who might have been stopped before committing egregious acts had they been identified, and counseled, or disciplined as part of an early warning system. These weaknesses were also pointed out in our 1993 audit of PIIAC and IAD.

In addition, we spoke with a researcher at Indiana University who is working on a satisfaction study of participants in civilian oversight systems in six cities, including both Portland and Minneapolis. Although he has only completed a preliminary analysis and is not ready to release a full report, he told us that there is no significant difference in satisfaction in cities he studied. The one aspect that showed a significant positive difference was that citizens are more satisfied reporting their complaints to an agency outside the police department.

**Goals of a police oversight system**

The basic goals of a police oversight system are to improve police accountability to the public, and to provide the opportunity for a fair and open resolution of complaints against the police. A police oversight system must reflect the needs of the individual community.

Our study reveals that Portland citizens have several core values concerning police oversight. These values, or goals, were mentioned repeatedly in public testimony and in our interviews with local task force members, PIIAC members, and outside experts:

- Improve officer behavior
- Improve public trust
- Improve Bureau policies and procedures
- Ensure thorough and fair investigations

According to one leading national expert, Dr. Douglas Perez, an effective police oversight system should possess the following attributes:

- Legitimacy – The process should be perceived as fair by participants and the community at large
- Integrity – The process should have procedures that ensure a thorough and fair hearing and resolution of complaints
- Learning – The process should provide feedback to decision-makers so that meaningful improvements can be made to the complaint process and the police department.

Our evaluation of the current PIIAC system and our proposals for change are made in consideration of their impact on, and support for these goals and values.

**Strengths of our current system**

Despite the current concerns with the PIIAC model, it has unique strengths relative to other systems we reviewed. Specifically, our system:

- provides more opportunity for open, public debate
- offers more opportunities for complainant appeals to a public body
- places emphasis on recommendations for improvement, and
- is relatively less adversarial and legalistic

**Weaknesses of our current system**

Despite the strengths of the existing complaint handling system, we conclude that the current system has a number of weaknesses that inhibit success and effectiveness. The primary weaknesses are as follows:

**Trust in the process**

Many members of the community have little confidence that the system can objectively handle citizen complaints. Improved public trust is seen as the most important goal of a revised system. Several citizens we talked to believe that citizens are reluctant to come forward with complaints because they fear retaliation and believe that the system is impotent. Many voiced the concern that police officers are not able to investigate members of their own police force objectively.

In addition, police officers express concerns about the legitimacy of the process. Several police officials we spoke with were concerned about the objectivity of citizen advisors and their ability to make informed judgements without a background in police work.

**Integrity**

While the current system has procedures for case review and appeal at several points, the credibility of the PIIAC system is harmed because untrained citizen volunteers are asked to review the thoroughness and adequacy of police investigations. Citizen Advisors have pointed to their lack of training as a significant impediment to doing a consistently thorough job of case review. Thus, the current process does not provide adequate assurance that IAD is doing thorough investigations and that findings are based on objective information.

**Timeliness of investigations**

City Council, police managers, PIIAC citizen advisors, and others agreed that the current process takes too long. Our 1993 audit found that complaints took a median of 70 days to resolve, with several cases taking more than 100 days. Recently, complaints have taken as long as two years to complete. To address the current backlog of complaints, the Bureau doubled the number of investigators in the Fall of 2000.

**Bureau implementation of the Early Warning System, and complainant notifications**

In our 1993 audit of the complaint system, we found that the Bureau was not doing an adequate job of tracking information needed to identify officers for command counseling as part of the early warning system. Our recent follow-up work has concluded that the Bureau still cannot provide assurance that the Early Warning system is working as intended. In addition, IAD is not consistently notifying complainants about the status of complaints. Although required to notify complainants every six weeks

about the status of their complaint, we found through limited testing that this standard was met in only two of seventeen cases. This is an important function which directly relates to complainant satisfaction and community trust.

**Description of other city models**

During the week of February 22-27, the City Auditor and a staff member visited the cities of Minneapolis, San Francisco, and San Jose. These three cities were recommended to us by Task Force members, outside experts, and general literature as having effective police oversight systems. Our purpose in visiting and reviewing these systems was to learn how they operate, to assess their strengths and weaknesses, and to identify features that would work for Portland.

**Minneapolis**

Minneapolis' Civilian Review Board is made up of seven board members, an Executive Director, two investigators (recently reduced from three) and two support staff. Three of the Board members and the Board Chair are appointed by the Mayor. Four other Board members are appointed by a vote of the thirteen City council members.

Complaints are made directly to the CRA office. After a preliminary review, the Director decides whether a case will be dismissed, mediated, or investigated. A complainant who is not satisfied with this preliminary decision can appeal to the Board. The Board decides at its next meeting whether to begin a full investigation. After further investigation by CRA staff, the Director makes a decision if there is probable cause that a violation has occurred. If no

probable cause is found, a complainant can again appeal in a closed hearing – this time with only the Board Chair. If the Board Chair decides there is probable cause, the case is either settled by the officer, or taken to a private evidentiary hearing. The complainant is only allowed to attend the hearing to testify as a witness. The Director told us that evidentiary hearings are rare, the last was held in March of 2000. The Director told us that they do not make policy and procedure recommendations to the Police Department.

### **San Francisco**

The San Francisco Office of Citizen Complaints (OCC) is an investigative agency under the direction of the Police Commission, a body of five citizens appointed by the Mayor, who also have responsibility for overseeing the Police Department. The staff is comprised of a Director, two trial attorneys, 19 investigators, an information systems analyst, and six administrative support persons.

Complaints against police are filed at the OCC office, or at other city facilities. After an investigation by a staff member, the Director makes a decision on the finding. Either the complainant or the officer can appeal the finding. After a private hearing, the Director makes the final decision as to the disposition. Disputes between the OCC and the Police Department may go the Police Commission for resolution. If the officer's discipline is more than 10 days suspension it must go before the Police Commission in public session. We were told the Police Commission has not held a public hearing in three years.

### **San Jose**

The San Jose Office of the Independent Auditor is made up of the Independent Police Auditor (IPA), an assistant director, a person to handle outreach, a person to handle intake, and two support staff. The IPA is given a four year appointment by the Mayor and City Council, and can only be removed by a vote of ten of the eleven members.

Complaints can be made directly to either the Police Department or the IPA office. The Police Department and the IPA office share a computer complaint management system. Each office knows which cases are open and closed along with relevant information about them. The responsibility for conducting investigations lies with the Police Department Internal Affairs Division. The IPA and her assistant have the authority to sit in on investigation interviews and ask questions of officers through a department representative. She can conduct follow-up investigations and request that more investigative work be done when needed. Disagreements between the IPA and Internal Affairs are resolved by the City Manager. The IPA has recently initiated a citizen advisory committee to increase outreach and to give advice on recommendations for police policies and procedures.

### **General observations**

1) Citizens express dissatisfaction with police review systems in these cities. Community representatives we spoke with in Minneapolis and San Francisco reported that community members are reluctant to report complaints because they do not think the system will be responsive. In general, representatives said they do not trust that the

system will operate fairly and objectively. Literature we reviewed about San Jose revealed similar community feelings.

Lack of support may stem from the low sustained rate of complaints. According to national experts and community representatives in the other cities, citizens appear to be disappointed by low sustained rates, leading them to believe the systems must be inherently unfair. However, national literature shows that low sustain rates occur no matter what system is employed. According to literature, sustained complaint rates are around 10% in almost all cases. Most complaints are difficult to prove because incidents often have few witnesses and little physical evidence.

2) The opportunity for citizen involvement in the three systems is very limited. None of the three cities use citizens to advise, monitor, or review complaint handling processes. Complainant appeals are usually held in private and very rarely heard in public. In Minneapolis and San Francisco virtually all appeals by complainants are heard in private. In all three cases, the director of the oversight body is given great authority to decide which cases will be investigated and which will be dismissed.

3) None of the three cities has City Council involvement in the complaint handling process. Although the Councils receive periodic reports, they do not act as an appeals board in any of the cities. In Minneapolis, the Mayor and City Council selects the citizens board, and in San Francisco, the Mayor appoints the Police Commission. In San Jose, the Independent Auditor is selected by the City Council for a four year term.

- 4) Despite continuing legal battles, the San Francisco system still has not completely resolved its scope and authority during its 20 years of operation. The San Francisco OCC has two trial lawyers on staff who, according to the OCC Director, engage in legal battles with both the City Attorney and the police union. The OCC staff strongly recommended that Portland hire a staff attorney if we decided to implement an independent investigations model.
  
- 5) San Francisco and San Jose include recommendations for improvement. Minneapolis emphasizes fact-finding rather than any formal process for recommending changes to policies and procedures.
  
- 6) Mediation is considered to be a valuable tool by both police and oversight bodies in Minneapolis and San Francisco, despite the fact that few cases are actually mediated. San Jose is currently developing a mediation system.
  
- 7) An Early Warning system is critical to identify potentially serious behavioral problems. All three systems participate directly in notifying their police departments about officers who present potential problems.
  
- 8) Community outreach is critical to convince citizens that they can make complaints without fear of retribution and that their input will be seriously considered.

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# Proposal to Change the Police Complaint Handling System

We propose a revised model for handling citizen complaints about police behavior that retains the positive features of our existing system while adding new elements to improve legitimacy and integrity, and to facilitate police organizational improvement. In our view, a successful police oversight system must be 1) accepted as legitimate by all parties, 2) viewed as fair and thorough by the complainant and police officer, and 3) focused on changing police practices that contribute to citizen complaints.

We propose to create the Division of Independent Police Review (IPR) within the Office of the City Auditor. The IPR would assume a major role in accepting, reviewing, and investigating complaints about police behavior. While the Police Bureau would retain primary authority for investigating complaints, the staff of the IPR would receive initial complaints, review police investigative findings, monitor and report on complaint status, and conduct independent investigations when warranted. The IPR should not have authority to investigate shootings or deaths in custody, or to discipline officers.

We also propose that the City Council appoint a Citizen Review Committee to review and decide on citizen appeals of Police and IPR investigation findings. The Committee

will also meet regularly to review complaint trends and to advise the Bureau on ways to improve practices that contribute to citizen complaints.

The major elements of the new system would include:

**Central intake and record keeping**

The IPR will receive, track, and record all initial contacts. IPR will have authority to decline complaints, offer mediation, or to refer the complaint to other offices. IPR and the Police bureau will share a networked data base system to record and transmit complainant contacts. Complaint forms will be available in various formats throughout the City.

**Expanded use of mediation**

IPR will encourage mediation to resolve less serious complaints when appropriate. Mediation will be a voluntary choice by the complainant and the officer, but the results will be final.

**Authority for independent complaint investigation by IPR staff**

IPR may monitor and observe investigations conducted by the Police Bureau, but may also conduct independent investigations if warranted. If the IPR decides to conduct an independent investigation, IPR will use its investigators or hire contract investigators.

**Two opportunities for complainant appeals**

Complainants may request reconsideration of Police Bureau investigation findings and may appeal final investigative findings of the IPR.

**Citizen Review Committee to review and decide appeals**

A Citizen Review Committee should meet regularly to review police and IPR investigative results, to recommend reconsideration of IAD findings and to approve appeal of final investigation to public hearing.

**Public hearing to resolve disputed findings**

Disputed findings and complaint appeals of final investigations will be heard in a public hearing. The hearing will be held by a professional hearings officer or an independent adjudicator. Findings of the hearing will be final. The Police Chief must respond in writing to findings that differ from the Police findings on the complaint.

**Frequent public reporting of complaint status and resolution**

The IPR will prepare monthly, quarterly and annual reports on the status and resolution of all complaints for the Citizen Review Committee. Reports will assess timeliness, trend rates, nature of complaints, frequency of complaints, sustained rates, and other performance indicators. IPR will submit early warning reports to the Chief of Police and quarterly and annual reports to the City Council.

**Ongoing dialogue with citizens, police officers, and management**

The IPR will meet bimonthly with the Citizen Review Committee, police officers and union representatives, and police management to discuss complaint trends, evaluate the nature and cause of complaints, and to develop recommendations to improve practices that contribute to complaints.

We believe the proposed system offers several benefits not available in our existing system or in other systems we studied. Specifically, the proposed system:

1. Improves trust by moving complaint intake to a neutral site;
2. Strengthens police oversight by adding independent, professional investigators;
3. Retains active citizen input and offers redress through public hearings;
4. Focuses on police service improvement and the reduction of police complaints; and
5. Builds stronger community police ties by emphasizing outreach and mediation.

We estimate that the ongoing operating costs for the IPR Division will be about \$497,000. This includes a staff of seven. We propose that two intake positions be moved from IAD to the new office, and that the existing PIIAC Examiner position be retained. The four newly proposed positions represent new costs to the City of about \$329,000. In addition, one-time start-up costs are estimated to be approximately \$30,000.

A flowchart of the proposed complaint handling process and an organization chart are contained following our recommendations. Our specific recommendations are as follows.

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**Recommendations #1 *Create an Independent Police Review (IPR) Division within the Office of the City Auditor.***

The mission of the Division is to offer citizens a fair process for submitting complaints about police behavior that results in an objective resolution and improved police practices. The primary duties of the Division are to oversee the acceptance and resolution of citizen complaints about police, and to develop and transmit recommendations to improve the Portland Police Bureau. There should be a Director position created with broad powers for accepting, reviewing, and investigating citizen complaints about police behavior. The Director should have extensive investigative and administrative experience, preferably in a public safety capacity. The Director will be responsible for drafting new City Code and administrative procedures to implement the new system.

**#2 *The IPR will be the primary intake point for citizens wishing to file complaints.***

The IPR will receive and record initial contacts with the public. A computer database will be shared with the Police Internal Affairs Division (IAD) to record, monitor, and manage all complaints. Interviews may be completed either at the IAD office, Police Bureau or another convenient City facility at the choice of the complainant or witnesses. IAD will develop criteria for declining, mediating, referring, or investigating complaints. If the case is to be investigated, sworn statements should be required.

**#3 The Mayor and City Council should appoint a Citizen Review Committee to the IPR.**

The Committee should meet regularly to review the status of complaints, to evaluate complainant appeals, and to recommend complaint submittal to public hearing. The committee will also act as an advisory board to the IPR-- reviewing periodic reports, assessing the number and nature of complaints, and developing recommendations for the Police Bureau on ways to reduce citizen complaints.

**#4 The primary responsibility of investigating citizen complaints should remain with IAD.**

IPR will refer complaints to the Police IAD for investigation. IPR staff may participate in the IAD interviews and closely monitor the complaint investigation. IAD will transmit investigation findings to IPR. IPR may request reconsideration of the finding if the Director believes fairness and thoroughness could be improved.

**#5 Give IPR authority to conduct independent investigations if warranted.**

The Director of IPR should have the authority to initiate independent investigations using staff or contract employees. Independent investigations can be initiated after IAD reconsideration of initial finding if the IPR

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believes the investigation was not thorough, complete, or sufficiently fair. For example, the IPR can initiate investigations if IAD fails to meet deadlines for timely completion of its work, consistently fails to conduct thorough investigations, or if the Director determines that a particular complaint merits special involvement.

**#6 *Provide complainants two opportunities to appeal results of investigations.***

Complainants may receive reconsideration of police investigative findings if approved by the IPR or Citizens Review Committee. Complainants may also appeal findings of the IAD and IPR final investigations. The Citizens Review Committee must approve complainant appeals before forwarding to a public hearing.

**#7 *The final disposition of complaint findings will be made at a public hearing.***

The City Auditor will appoint an independent hearing officer or professional adjudicator to resolve disagreements between parties after a final investigation. The Citizens Review Committee may also refer complaint appeals of final investigations to the public hearing. The Police Chief must report to the IPR to acknowledge the final findings and indicate whether action will be taken in response to the findings.

**#8 *The Police Chief should determine the appropriate level of discipline for sustained complaints.***

**#9 IPR will prepare frequent public reports on the status and resolution of citizen complaints.**

The IPR should track and monitor the disposition of all cases from receipt to resolution. The IPR will provide periodic reports on individual officers to the Police Bureau's Early Warning System for appropriate personnel action. The IPR will prepare quarterly and annual reports to the Citizen Review Committee, the City Council, and the Police Chief. The IPR should also prepare special reports to City Council to address complaint handling timeliness, corrective actions, and other problem areas.

**#10 The Citizen Review Committee should develop and submit recommendations to the Police Bureau for improvements to policies and procedures.**

Recommendations could include, but not be limited to, the types of recommendations made by the current Citizens Advisory Committee.

**#11 IPR should implement an ongoing outreach program to inform citizens and police officers of the operation of the complaint handling system.**

The IPR should meet regularly with the Citizen Review Committee, police officers, union representatives, and police management. Complaint forms should be available at community facilities around the City and on-line. IPR should attend community meetings to make the public aware the Division's mission.

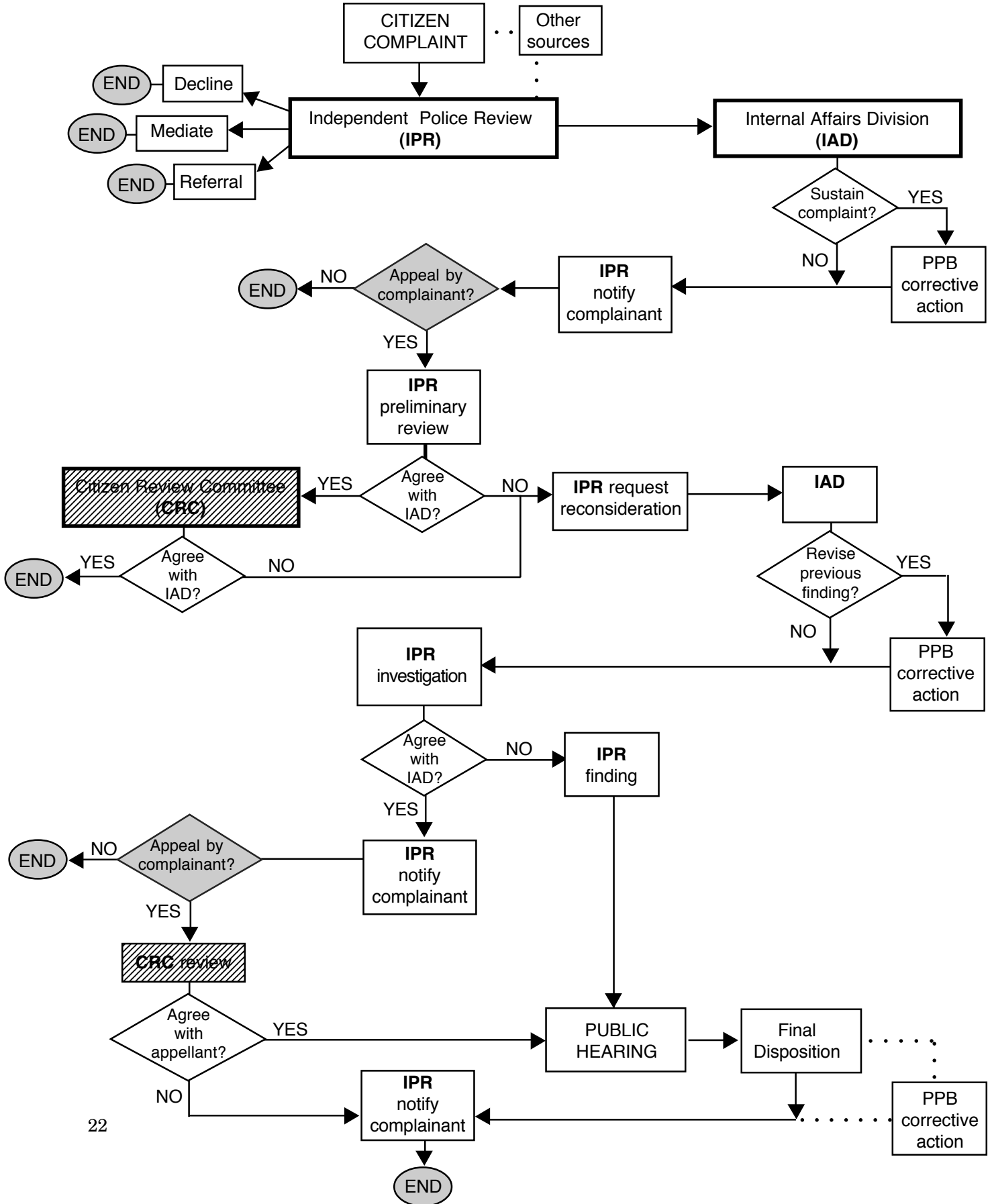
***#12 Evaluation surveys be distributed on a regular basis to monitor customer service goals.***

Performance goals and measurement instruments, including customer surveys, should be developed, analyzed and reported on regularly. This should include surveys of complainants, police officers, and community satisfaction.

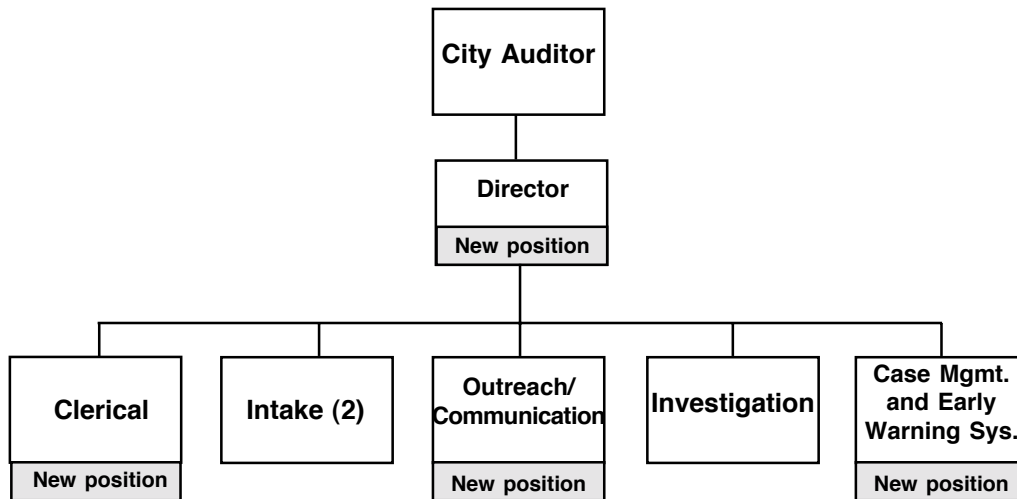
***#13 We do not recommend that the IPR review police shootings or deaths in custody.***

Other review mechanisms already exist for police shootings and deaths in custody. For example, the County grand juries, comprised of citizens, review these incidents under the purview of an independent agency, the District Attorney's Office. Further, the complexity of these cases are not suitable to the process we have developed. We believe there may also be legal uncertainties and liabilities which would need additional research to identify.

**Figure 1 Flowchart of police complaint handling**



**Figure 2**  
**Independent Police Review Division**  
**Organization Chart**





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# Sources

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Todd Olson, *Work Group majority member, and former PIIAC Chair*  
Dr. Michael Hess, *PIIAC Examiner*  
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Jeff Barker, *Lt., Portland Police Bureau*
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Dr. Richard Terrill, *Georgia State University*

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Mary Dunlap, *Director, San Francisco Office of Citizen  
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Kathy Mahoney, *Attorney, San Francisco Police Officers  
Association*  
Diana Frappier, *Legal Director, Bay Area Police Watch*  
Teresa Geurrero-Daly, *San Jose Independent Auditor*  
Lt. Chris Moore, *San Jose Police Department Internal Affairs  
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Gerald Silva, *City Auditor, City of San Jose*

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Numerous newspaper articles to be found in the audit workpapers

