

A Resolution declaring a conflict of interest with the Department of Law; and authorizing and directing the Interim Executive Director to take all actions necessary to engage the services of Flannery Georgalis, LLC as independent legal counsel for the Commission.

WHEREAS, pursuant to Paragraph 19 of the Consent Decree between the United States of America and City of Cleveland, the City is required to provide to the Commission “access to all information requested by the Commission related to its mandate, authority, and duties unless legally restricted”; and

WHEREAS, pursuant to City of Cleveland Charter 115-5(h)(17), the Commission has the power of “[r]equesting and timely receiving, without the need for making a formal public-records request, from other City departments and offices including the Division of Police and Director of Public Safety, information relevant to the Commission's duties”; and

WHEREAS, pursuant to City of Cleveland Charter 115-5(h)(18), the Commission’s broad authority includes “[a]ccessing un-redacted complaints against officers and unredacted files of all closed investigations . . .”; and

WHEREAS, on January 23, 2024, the Court in the Consent Decree matter issued an Order, attached hereto as Exhibit A, requiring “the parties and the Monitor to discuss and develop a process by which the Monitor and DOJ can be put on notice of document requests [by the CPC] to which the City objects . . .”; and

WHEREAS, the Court’s Order noted that “[t]he City might also seek to engage with the incoming counsel for the CPC around the issue of developing a process for streamlining the document requests of the CPC[,]”; and

WHEREAS, on March 18, 2024, in compliance with the Court’s Order, the Parties and Monitor filed with the Court in the Consent Decree matter a Joint Status Report, attached hereto as Exhibit B, appending an agreed-upon process for records requests from the Commission; and

WHEREAS, the Joint Status Report provides that the established process was developed after “[t]he Parties, Monitor, and CPC members met several times”; and

WHEREAS, the established, agreed-upon, court-approved process for handling requests from the Commission, attached hereto as Exhibit C, requires the “City [to] produce to the Commission requested information within 21 days of receipt of the request[,]” and provide any “objection [to the request] within seven days of receipt” of the request; and

WHEREAS, the City, through the Police Accountability Team and members of the Law Department, maintains an excel spreadsheet (the “Tracker”), attached hereto as Exhibit D, that it uses to track the Commission’s requests; and

WHEREAS, the Tracker includes the date the Commission submits a request, the date the City produces the documents in response to the request, the status of the requests, including whether it is complete, partially incomplete, or pending, and the amount of days from submission of the request to the current date; and

WHEREAS, the Tracker makes clear that the City continuously and regularly fails to meet the 21-day Court deadline to produce records to the Commission; and

WHEREAS, the City, through the Law Department, and as signed by Director of Law, agreed to the process for handling the Commission’s requests, despite not adhering to such process; and

WHEREAS, the City, through the Law Department, is responsible, at least in part, for both producing the required records and simultaneously representing the City in this matter; and

WHEREAS, the Commission cannot fulfill its broad mission as outlined in the Consent Decree and Charter 115-5 without obtaining the records it requests in a timely and complete manner; and

WHEREAS, the Commission desires to exercise its broad powers under both the City of Cleveland Charter 115-5(h)(17)-(18) and the Consent Decree to access and receive records without interference from the City and/or the Law Department; and

WHEREAS, the Department of Law’s dual role in both defending the City and serving as one of the stakeholders responsible for compliance with the Court’s Order and producing and/or objecting to the product of records creates a conflict of interest; and

WHEREAS, in order to ensure the mission of the Commission is protected, upheld, and safeguarded in a manner that is consistent with the will of the citizenry as expressed in Charter 115-5, and in furtherance of the overarching goal of the Consent Decree to effectuate police reform and ensure constitutional policing, the Commission has determined that retaining the services of independent outside counsel in this matter is necessary; and

WHEREAS, the Interim Executive Director canvassed law firms and has recommended the services of Flannery Georgalis, LLC.

NOW, THEREFORE, BE IT RESOLVED by the Community Police Commission of the City of Cleveland, that:

1. The Commission hereby finds and declares that a conflict of interest exists with the mission of the Commission and the City’s Law Department regarding the production of and/or access to records.

2. The Commission hereby approves the retention of Flannery Georgalis, LLC for the services of outside counsel to represent the Commission in this matter.
3. The Commission authorizes the Interim Executive Director to take all necessary steps to engage and direct outside counsel consistent with this Resolution.
4. This Resolution shall take effect immediately upon its adoption.

DR. JOHN ADAMS
Co-Chair of the Commission

SHARENA ZAYED
Co-Chair of the Commission

ALIX M. NOUREDDINE
Secretary of the Commission

PASSED:

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	Case No: 1:15 CV 1046
)	
Plaintiff)	JUDGE SOLOMON OLIVER, JR.
)	
v.)	
)	
CITY OF CLEVELAND,)	
)	
Defendant)	<u>STATUS CONFERENCE ORDER</u>

On January 18, 2024, at 3:00 p.m., the court held a telephonic status conference in the within case with counsel for the parties and the Monitor, Karl Racine (“Monitor”). At the conference, the Monitor and the parties discussed the Monitor’s assessment plan and priorities for 2024; the Monitoring Team’s budget, invoices, and staffing; the status of the revised Collective Bargaining Agreement between the City of Cleveland (the “City”) and the police unions, which had previously been a source of concern for the Monitor and the Department of Justice (“DOJ”); and the process regarding the Community Police Commission’s (the “Commission” or “CPC”) requests for documents and information from the City.

With respect to the budget, the court and counsel for the parties recognized that the expenses incurred by the Monitor and the Monitoring Team would increase as a result of the assessments being completed. With respect to the invoices, counsel for the parties and the Monitor discussed billing issues that have slowed the payment of invoices submitted by the Monitor. The court

recognized the potentially adverse effect that delayed payments resulting from disputes over the Monitoring Team's billing may have on team morale within the Monitoring Team. Accordingly, the court is prepared to intervene and review any contested items on the Monitoring Team's invoices if the parties are unable to resolve the disputes themselves. This will ensure that members of the Monitoring Team are paid in a timely fashion.

With respect to staffing, the Monitor informed the court that he is looking to add up to four subject-matter experts and a senior paralegal to the Monitoring Team to fill the loss in expertise and skill-sets the Monitoring Team has suffered as a result of team turnover during and after the transition. To date, the City is still raising concerns regarding the Monitor's desire to hire a senior paralegal to backfill the role currently held by outgoing Monitoring Team member, Lisa Fink. The court hereby orders the parties to confer on the matter in an attempt to reach an agreement. If the parties are unable to reach agreement by January 29, 2024, the City shall notify the court in writing, and the DOJ shall file a response. The court will then schedule a brief conference to resolve the matter.

The City noted that it receives voluminous requests from individual CPC members and the Executive Director. They also have received requests for law enforcement sensitive material, for example, to which the CPC is not entitled. The DOJ noted that it had heard that the requests to the City were substantially backlogged, and the Monitor confirmed this. The DOJ's primary concern was that it receive notice of the requests and that the City timely responded by providing the documents or objecting to them on whatever grounds it deemed appropriate. As a first step, the court hereby orders the parties and the Monitor to discuss and develop a process by which the Monitor and DOJ can be put on notice of document requests to which the City objects, so that the DOJ may respond.

The parties and the Monitor shall have until March 18, 2024, to develop such a process and notify the court once they have done so. The City might also seek to engage with the incoming counsel for the CPC around the issue of developing a process for streamlining the document requests of the CPC.

Finally, in addition to the semiannual status conferences the court has typically held in this case, the court plans to continue to hold status conferences with the parties on a more frequent basis. The court will inform the parties if and when these status conferences will be held on the record.

IT IS SO ORDERED.

/s/ SOLOMON OLIVER, JR.
UNITED STATES DISTRICT JUDGE

January 23, 2024

FOR THE UNITED STATES

REBECCA C. LUTZKO
U.S. Attorney
Northern District of Ohio

/s/ Michelle L. Heyer

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FOR THE CITY OF CLEVELAND

MARK GRIFFIN
Director of Law
City of Cleveland

/s/ Mark Griffin

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EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:15CV1046
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
)	
v.)	
)	
CITY OF CLEVELAND,)	<u>JOINT STATUS REPORT REGARDING</u>
)	<u>THE COMMUNITY POLICE</u>
Defendant.)	<u>COMMISSION'S DOCUMENT AND</u>
)	<u>INFORMATION REQUEST PROCESS</u>

On January 18, 2024, the Court held a telephonic status conference with the Parties and Monitor. During that conference, the Parties discussed requests made by the Community Police Commission (CPC) to the City for documents and information. The Court ordered the Parties and Monitor to “develop a process by which the Monitor and DOJ can be put on notice of document requests to which the City objects, so that the DOJ may respond.” *See* Status Conference Order, ECF No. 505, at 2. The Court gave the Parties and Monitor until March 18, 2024 to develop a process and notify the Court. *Id.* at 3.

The Parties, Monitor, and CPC members met several times to develop such a process. The established process is attached hereto as Exhibit A.

Respectfully submitted,

FOR THE UNITED STATES

REBECCA C. LUTZKO
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Northern District of Ohio

/s/ Michelle L. Heyer

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FOR THE CITY OF CLEVELAND

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EXHIBIT C



City of Cleveland

Justin M. Bibb, Mayor

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Draft Process for Records Requests from the Community Police Commission (3/15/2024)

- The Commission will follow the process outlined in its bylaws for requesting records from the City (“City” in this document refers to all entities within the City, including but not limited to the Office of Professional Responsibility and the Civilian Police Review Board)
 - o Requests for records will be submitted by the Commission’s Executive Director
- The Commission will email its requests for documents to City-staff designees. The Commission may CC to MT and DOJ designees, but as set forth below, the City is responsible for notifying the MT and DOJ of requests.
 - o City will notify MT and DOJ within 3 business days of receiving a request.
- If the Commission or an individual Commissioner requests records outside of established process, the City will respond directing the Commission or individual Commissioner to follow the process (the City will CC MT and DOJ on this correspondence)
- The City will respond to Commission requests issued pursuant to the bylaws in accordance with the Court order dated September 3, 2021 (Dkt. #382):
 - o The City will produce to the Commission requested information within 21 days of receipt of the request.
 - o If the City objects to the request, the City will submit its objection within seven days of receipt to the Commission, the MT, and DOJ.
 - If the City requests clarification of a request, then the City will provide that request for clarification to the Commission, the MT, and DOJ. The Parties will treat any request for clarification as an objection within the meaning of the Court’s September 3, 2021 Order (Dkt. #382), including deadlines for response.
 - If the CPC chooses to restate its request following a request for clarification, the Parties agree to treat each such restated request as a new request and would restart the deadline for responses pursuant to the Court’s September 3, 2021 Order (Dkt. 382).
 - o If the MT or DOJ disagrees with the City’s objection, they will inform the City within seven days of receiving the objection.
 - o Within seven days after receiving the notice of disagreement, the City will produce the requested information to the CPC or it may petition the Court to relieve it of its obligation to produce the information.

EXHIBIT

A



City of Cleveland
Justin M. Bibb, Mayor

- If the City, at any point after making an objection, decides to respond to the CPC's original request, its deadline for responding will be 21 days from the original request.

As of March 15, 2024, the DOJ's designees are as follows:

- Acrivi Coromelas Acrivi.coromelas2@usdoj.gov
- Mike Evanovich Michael.evanovich@usdoj.gov
- Michelle Heyer Michelle.heyer@usdoj.gov

As of March 15, 2024, the City's designees are as follows:

- Leigh Anderson landerson2@clevelandohio.gov
- Mark Griffin mgriffin@clevelandohio.gov
- Brian Carney bcarney@clevelandohio.gov
- Delante' Thomas dthomas3@clevelandohio.gov
- Hannah Macias hmacias@clevelandohio.gov
- Carlos Johnson cjohnson2@clevelandohio.gov
- Robert Simon rsimon@clevelandohio.gov

As of March 15, 2024, the MT's designees are as follows:

- Karl Racine Karl.racine@hoganlovells.com
- Abby Wilhelm Abby.wilhelm@hoganlovells.com
- Charles See Charlessee709@gmail.com
- Victor Ruiz Victorar Ruiz@hotmail.com

EXHIBIT D

CPC#	Description	Data Submitted	Data Produced	Status	Timeline	Status Update	Notes
2025-CPC-004	<p>1. Intake forms from the Internal CDP complaints that are in the Human Resources department. We requested these for 2019 to present, but never received them. We also requested these forms dating back to 2015, the start of the Consent Decree</p> <p>2. An update on the fulfilling the CPC's request for Intake forms, Dispositions and Investigation Summaries of Closed Cases and a list of all open CDP complaints from (2015-2019)</p> <p>3. Records from the Garfield Incident and the December shooting of the 14-year-old boy.</p> <p>- The closed criminal investigations from the County's Sheriff's office</p> <p>- Letter(s) from the Prosecutor</p> <p>- An update on the status of both cases, particularly when we can expect the internal investigation to be completed.</p> <p>4. A formal request for monthly updates on ongoing litigation</p> <p>5. Hearings transcripts from the Wells and Kilbane cases</p> <p>6. All Department of Public Safety departure letters of which CPRB discipline was changed from November 2021 to present.</p>	21-Apr-25		Partially Complete	123	(4/25/25 update) CDP records produced to CPC SharePoint (6/4/25 update) Litigation update document produced to CPC SharePoint (6/18/25 update) responsive documents to items 1 - 4 produced	<p>(4/22/25 update) CDP related documents uploaded to Law SharePoint for review.</p> <p>(4/29/25 update) Public Safety related documents uploaded to Law SharePoint for review</p> <p>(5/1/25 update) HR compiling responsive documents. Law compiling response to item 4</p> <p>(6/18/25 update) HR Director provides responsive email to items 1 & 2 and provided hard copies for pickup. Comm. Adams confirmed receipt of documents.</p> <p>Documents Produced:</p> <ul style="list-style-type: none"> - CDP response memo re item 3 - County Prosecutor letter re "Garfield Incident" - County Investigative report re "Garfield Incident" - List of pending litigation cases - Updated spreadsheet of CDP case statuses from 2019 - 2025 - Item 1 documents (hard copies) - Item 2 documents (hard copies)
2025-CPC-006	All CPRB discipline letters sent to the Chief of Police and Public Safety Director from November 2021 to the present.	12-Jun-25		Pending	71		(6/13/25 update) City working on setting up SharePoint for OPS/CPC document exchanges to make production process more efficient.
2025-CPC-007	The CPC received the below-communication concerning a matter that was presented to CPRB [OPS 2024-0244]. Has CPRB yet issued its disposition of the case? If so, can you please send us the case/investigation file. If not, please let me know, and I will let the complainant know that their appeal request is premature at this time	14-Jul-25		Pending	39		
2025-CPC-008	The CPC received the below-appeal request [OPS 2022-0216]. Can you please send the case/investigation file for the CPC's review?	14-Jul-25		Pending	39		
2025-CPC-012	The CPC is requesting all CPRB/OPS disposition letters and disciplinary or other corrective action recommendations provided to the Chief of Police and/or Director of Public Safety for the calendar year 2024 and from January 1, 2025 to the present.	28-Jul-25		Pending	25		
2025-CPC-013	In connection with Records Request No. 2025-CPC-0004, concerning the shooting of the 14-year-old boy, the CPC is requesting the charging letter, pre-disciplinary hearing file, any internal investigation file, and any other evidence, records, documents, files, or otherwise considered, reviewed, and/or used in reaching the results of the pre-disciplinary hearing. Based upon the responsive records provided, it is our understanding that the case was finalized and reviewed on or about April 25, 2025.	28-Jul-25		Pending	25		
2025-CPC-014	<p>The CPC is requesting the entire investigative file for the attached-referenced OPS case and any findings/dispositions of CPRB in connection with the case. To the extent extra-record evidence, records, material, testimony, or otherwise was relied upon during the pre-disciplinary hearing in reaching the attached departure associated with this matter, the CPC is requesting those items, as well.</p> <p>Please note that there is a discrepancy concerning the case number that OPS may have assigned the Woods case. The body of the email transmitting the departure letter to CPC and other stakeholders refers to OPS Case 2024-0130; however, the departure letter references the assigned case number as OPS 2023-0086. To avoid any uncertainty, the CPC is requesting the case file for the Demetrius Woods PO #2127 action, however that case was assigned by OPS.</p>	8-Aug-25		Pending	14		
2025-CPC-015	<p>The CPC is making the following request:</p> <p>All extra-record evidence, records, material, testimony, or otherwise that the Chief of Police, Director of Public Safety, or any other CDP official or member relied upon during the pre-disciplinary hearing, decision-making process, or otherwise in reaching any and all departures from CPRB's recommendations/decisions/dispositions during the calendar year 2024 and from January 1, 2025 through the present.</p> <p>"Extra-record evidence, records, material, testimony, or otherwise" means those items not contained in the OPS/CPRB associated case files.</p>	8-Aug-25		Pending	14		

#	Description	Start Date	End Date	Status	Time/hrs	Notes/Comments	Notes
2023-CPC-001	All Brady/ Giglio Letters from County Prosecutor	17-Apr-23	28-Oct-23	Complete	194	(5/17/24 Update) Closed.	
2023-CPC-002	1. Any GPO's or Divisional Notices governing the use of Drones or unmanned aircraft/ unmanned ground vehicles 2. Any GPO's or Divisional Notices governing the use and response of ShotSpotter 3. Any GPO's or Divisional Notices governing the use of Automated License Plate Readers 4. Any other GPO or Divisional Notices dealing with surveillance technology and or surveillance software utilized by the division of police (except of body cameras) 5. Any other supporting documents that show progress in meeting any of the concerns or recommendations made in the May 9th report	5-May-23	25-Apr-24	Complete	356	(5/17/24 Update) Closed. Partial Response on May 8, 2023. May 9th report - former CPC report (2022 Surveillance tech report). No listing for what was not provided	Documents produced: - 4 06 13 Automatic License Plate Readers - Email memo from Chief Todd (5/28/24)
2023-CPC-003	All the written documentation contained in these case files (no bodycam etc. needed): Alford: OPS 2022-0257 Blackwell: OPS 2022-0134 (DBI 2922-0094) Blade: OPS 2021-0101 Carrucini: OPS 2022-0103 Durrhko: OPS 2021-0048	31-Jul-23	15-Aug-24	Complete	381	Closed	Documents produced: Each case file, including but not limited to: - Orders to appear - Email correspondence - OPS complaint, intake, report, exhibits, statements - LERMS reports, duty reports - Charge, departure, dismissal letters - WCS
2023-CPC-004	Updated written plan(s) for recruitment or retention.	29-Aug-23	27-Sep-23	Complete	29	(5/10/24 Update) CPC verified date. Closed.	

2023-CPC-005	Contracts for purchase of new surveillance technology and bid requests by the City of Cleveland which will be utilized in the RISE initiatives.	29-Aug-23	25-Apr-24	Complete	240	(5/10/24 Update) CPC verified date. Closed.	Document produced: - Mayor Bibb RISE Initiative
2023-CPC-006	Policies, procedures and MOUs or agreements related to increased or expanded use of surveillance technology and A.I.-assisted data analysis via the Real Time Crime Center.	29-Aug-23	5-Oct-23	Complete	37	(5/10/24 Update) CPC verified date. Closed.	
2023-CPC-007	The current draft of the updated pursuit policy referenced at the recent City Council Safety Committee meeting, if one exists.	29-Aug-23	5-Oct-23	Complete	37	(5/10/24 Update) CPC verified date. Closed.	
2023-CPC-008	Any memorandums, memos, divisional notices or agreements regarding inter-jurisdictional police pursuits in Cleveland or drafts of such documents.	29-Aug-23	5-Oct-23	Complete	37	(5/10/24 Update) CPC verified date. Closed.	

2023-CPC-008	Memos, written agreements, etc between City of Cleveland and partnered agencies related to the Rise Initiative.	29-Aug-23	25-Apr-24	Complete	240	(5/10/24 Update) CPC verified date Closed.	
2023-CPC-010	Policies, procedure, and divisional notices related to the city and CDP's violence reduction efforts, the work of the Violence Reduction Task Force, and related work on crimes of violence, gang activity, drug enforcement and fugitive apprehension with a focus on hot spots, problematic locations and streets.	29-Aug-23	28-May-24	Complete	273	Closed	Document produced: - Email memo from Chief Todd (5/28/24)
2023-CPC-011	Other information, policies, procedures or MOUs/agreements related to plans for aggressive enforcement and increased police visibility.	29-Aug-23	28-May-24	Complete	273	Closed	Document produced: - Email memo from Chief Todd (5/28/24)
2023-CPC-012	Most up-to-date top tier crime reports.	29-Aug-23	10-May-24	Complete	255	Closed	
2023-CPC-013	Monthly updates/reports from the City Law Department on litigation against Cleveland Division of Police members	21-Sep-23	25-Jul-24	Complete	308	Completed	Document produced: - Email list from Chief Thomas (7/25/24)
2023-CPC-014	Any and all materials related to a police officer against whom a lawsuit has been threatened or filed, or for whom the City has paid a settlement to obtain a liability release, or against whom there has been a court judgment for alleged misconduct.	27-Oct-23	30-May-24	N/A	246	(5/30/24 Update) CPC confirmed this is not a request for records & struck from tracker	
2023-CPC-015	The most comprehensive human resources disciplinary file on all CDP officers disciplined from 2022-23. We believe the correct file is colloquially called the "Chief's File". If not, please have the City provide the most comprehensive and inclusive disciplinary file available on each charged CDP officer from 2022-2023. We look forward to the City fulfilling this request in accordance with the Consent Decree, Charter 115-5, and associated rulings.	27-Oct-23	19-May-25	Complete	570	<p>582 total requested cases (555 CDP cases, 27 OPS cases) (5/9/24 update) Estimated total pages for CDP cases is 216,960 (5/31/24 update) CPC will update on any potential changes to request CDP will update on IAPro access. (7/11/24 update) City informed CPC there is no way to give IAPro access to CPC without improperly disclosing protected information. CDP continues to produce IAPro snapshots. (7/26/24 update) IAPro Snapshots have been uploaded to Law - these documents are currently being transferred to the CPC SharePoint. (8/29/24 update) >200 IAPro snapshots produced to CPC SharePoint. (11/14/24 update) CDP uploaded all files to Law. Law estimates 2 months to fully produce.</p> <p>City objected on February 1, 2024. "Court PRIORITY" City began production. Summaries provided based on incident #.</p> <p>(5/10/24 Update) Jason to review. (5/17/24 Update) Did not discuss. (5/24/24 Update) Potential change in leadership for CPC subcommittee where request originated (accountability committee). Co-chairs will be meeting with new committee leadership to determine if any changes/refinements will be made to this request. Will update next meeting. (5/31/24 Update) R. Simon will touchbase with CDP IAPro Administrator for an update next meeting. (6/7/24 Update) Chief will update regarding CPC access to IAPro next meeting (6/14). CDP will produce IAPro case summaries in meantime - to be placed in CPC SharePoint folder titled "2023-CPC-015". (3/6/25 update) Public Records has worked to organized the produced documentation by year, type of investigation, and by investigatory file. Grey folders are completed, yellow folders in process. (5/1/25 update) Public Records finalizing production of records in coming weeks. ~4,900 files previously produced to SharePoint. Files do not include medical records (5/19/25 update) All responsive records produced (582 cases, 216,960 pages)</p> <p>Documents produced: - IA investigations (2022-2023) - District Bureau investigations (2021-2024) - Firearm Discharge investigations (2022-2023) - Inspections investigations (2022-2023) - Sick Reviews (2022-2023) - Vehicle Accident investigations (2022-2024) - Vehicle Damage investigations (2022-2023) - Vehicle Pursuit investigations (2022-2023)</p>	

2023-CPC-016	OPS Case #2019-0141. Complainant's name is Dorinza Johnson. a copy of the original complaint Any investigator records or files related to the complaint, and redacted body cam footage	27-Dec-23	2-Feb-24	Complete	37	(5/30/24 Update) CPC confirmed completion	
2024-CPC-001	All exit interviews, surveys, and related documents that have been completed for CDP officers who have left the Division. If there is any concern over the content, please have the Division immediately provide us with a list of the materials they possess on the departure, termination, or quitting of individual officers who have left the Division.	18-Jan-24	5-Feb-24	Complete	18	(5/10/24 Update) Complete.	Documents produced: - Email from Cmdr. Carney with 8 attachments - exit interviews 11/2020 - 12/2023 (2/5/24)
2024-CPC-002	All drafts of the Division's Integrity Policy regarding the identification of CDP officers under Brady, Giglio, and related case law. Please include all drafts written by Chris Vland, the City Law Department, and any other entities. We would like all drafts of the CDP Integrity Policy related to its Brady and Giglio obligations.	18-Jan-24	16-May-24	Complete	119	(5/24/24 Update) All responsive records produced. Request complete	Documents produced: - 2 03 06 Disclosure of Exculpatory Information (3 versions - 1 final, 2 drafts) - Giglio policy (3 drafts) - Duty to Disclose policy (2 drafts)
2024-CPC-003	Investigation files and use of force reports for all cases in 2021, 2022 and 2023 where a BRAZOS form was completed and/or where a mental health or crisis related impression code was issued by dispatch that resulted in an internal affairs and/or OPS investigation. The investigation files should include but not be limited to: • Divisional Notices • Disposition Letters • Investigative Summaries • CPRB recommendations and subsequent DPS and CDP Chief responses	18-Jan-24	25-Jul-24	Complete	189	Closed	Documents produced: - 7 CDP investigations - 2 OPS investigations
2024-CPC-004	ALL records related to the recent appointments of CDP Commanders. This would include but is not limited to: Divisional Notices Job Descriptions All resumes received All Form 1's received Any procedures or protocols for assessment of candidates Any rubrics or score sheets utilized to assess candidates List of person(s) involved in interview process List of Candidates interviewed Any records or recordings of interviews Any emails related to this topic between candidates and/ or members of the selection process	15-Feb-24	22-Feb-24	Complete	7	(5/10/24 Update) Completed.	Documents produced: - DN 23-316 - GPO 1.2.01 & 4.05.02 - Resumes & Form 1s - Interview questions & interview list + recommendations - Score sheets - Calendar appointments NOTE: produced documents were emailed rather than uploaded to SharePoint as request pre-dated SharePoint
2024-CPC-005	The CPC, via the accountability committee, and in accordance with its bylaws, is requesting all CPRB/ OPS records on file pertaining to OPS Complaint 2022-0116.	15-Feb-24	4-Jun-24	Complete	110	(6/7/24 Update) Completed. (8/9/24 Update) CPC informed City that some WCS not included in the document production. (8/22/24 Update) City is working to provide the relevant WCS & has produced 17 files so far	Documents produced: - OPS file (129 documents) - WCS - CPRB minutes - Safety Director hearing transcript & disposition letters
2024-CPC-006	Disciplinary records for all applicants for the Commander for the Bureau of Special Services and 4th District Commander.	5-Mar-24	3-May-24	Complete	59	(5/17/24 Update) Completed.	Documents produced: - Performance Evaluations - produced 4/15/24

2024-CPC-007	the use of force records for all applicants for the 4th District and Bureau of Special Services Commander positions. * amended to only the last five years that the candidate worked on the street	26-Mar-24	4-May-24	Complete	39	(5/17/24 Update) Completed	Documents produced: - Use of force - produced 4/28/24 - 5/3/24
2024-CPC-008	1. Computer Aided Dispatch (CAD) incident records for all pursuits for years 2020 -2024 (through Q1) 2. Computer Aided Dispatch (CAD) incident records for pursuits that were terminated by supervisors or officers for 2020 - 2024 (Q1) 3. RMS reports that are associated with vehicle pursuits or vehicle pursuit terminations as referenced in GPO 3.2.02 for years 2020 -2024 (Q1) 4. Accident Investigation Unit (AIU) Reports and OH-1's for accidents related to "pursuits" by the Cleveland Division of Police or other agencies whose pursuits resulted in accidents in Cleveland (investigated by Cleveland) for 2020 - 2024 (Q1) 5. Divisional Training records for Emergency Vehicle Driving or Pursuit Driving classes conducted by the division in 2020 - 2024 (Q1)	2-Apr-24	3-Jun-24	Complete	62	(5/24/24 Update) CPC confirmed partial production of items 3 & 4 (6/3/24 Update) All responsive documents have been produced	Documents produced: - 2020 - 2024 CAD pursuit records - 2020 - 2024 RMS reports - 2020 - 2024 AIUs & OH-1s - Training Section Emergency Vehicle - Pursuit Driving - POBT Driving Training
2024-CPC-009	Police Inspector General Applications from 2021 Search	4-May-23	5-May-23	Complete	1	(5/17/24 Update) City sent three batches of applications	NOTE - date is inaccurate (this occurred in 2023, not 2024). Will keep numbering to maintain system
2024-CPC-010 (u)	Any MOUs between CDP and outside affiliates, including MOUs that deal with territory expansions.	1-May-24	2-May-24	Complete	1	Completed	Documents produced: - Case Western, Cleveland Clinic, CMHA, CSU, Metro Health, Tri-C, UH, University Circle MOUs NOTE - this request did not come through the proper channels
2024-CPC-011	Request for IAPro case overview outline	7-May-24	8-May-24	Complete	1	Completed	Document produced - IAPro snapshot CPD2022-0103 NOTE - this request came via in-person meeting between the Chief and CPC Co-Chairs on 5/7/24. CPC wants to see case overview (table of contents - similar to evidence log of files) to determine specific files to clarify request 2023-CPC-015 (comprehensive discipline file).

2024-CPC-012	<p>The CPC is requesting all records related to officer Christopher Lane #1661 and allegations of domestic violence including but not limited to:</p> <p>IA Case file: 12012-0052 OPS Case File: 2023-0235</p> <p>Any hearing transcripts or other communications associated with those cases that may be relevant to these investigations and outcomes.</p>	7-Jun-24	25-Jul-24	Complete	48	<p>(7/26/24 Update) All documents produced (9/10/24 Update) Additional request made</p> <p>Documents produced: - Police reports - Email correspondence & disposition letter - IA & OPS reports</p> <p>NOTE - IED Goodrick made direct request to Capt. Simon for additional IA case files regarding additional complaints made by Ms. Nancy Lane against officer Lane (updated 9/10/24) (1/10/25 update) Hannah to follow up on additional request (2/6/25 update) The additional records requested were purged in accordance with the record retention schedule in November 2020. Purged case file list was provided to CPC, there are no additional responsive records to this request</p>
2024-CPC-013	<p>The CPC requests full case files including, video, hearing transcripts, investigatory files and any other pertinent information regarding the following discipline cases:</p> <p>CPD2023-0129 P.O. Todd Kilbane #2234 CPD2023-0012 P.O. Antwan Wells #9281</p> <p>Also included in this request is the full employment files/ service records for these officers and their current employment status/ assignment.</p>	12-Aug-24	4-Sep-24	Complete	23	<p>(9/4/24 Update) All documents produced.</p> <p>Documents produced: Each case file, including but not limited to: - Disciplinary hearing dispositions, charge & suspension letters - Recordings (WCS, phone calls, etc.) - Investigative reports - Email correspondence</p>
2024-CPC-014	<p>The CPC would like to submit a new request for records pertaining to ALL commander candidates who have applied to ALL vacant (interim) positions. The request is as follows:</p> <ol style="list-style-type: none"> Job Descriptions for each commander position Officer Service Records (As far back as records exist for each request) including: <ol style="list-style-type: none"> Original application forms and resumes. Any background investigation reports from time of hire or previous promotions Records of all past duty assignments and job descriptions for those assignments Promotional records or any records of changes of duty assignments All performance evaluations including field training evaluations and promotional training evaluations Any awards or commendations Complete training records including records of certificates and current status of OPOTA certification Full historical investigation and disciplinary records including complaint forms for any open investigations pending in IA or OPS or human resources Any records of litigation involving the officer in their official capacity as a member of the Cleveland Division of Police 	12-Dec-24	10-Jun-25	Complete	180	<p>(1/23/25 update) CDP files produced to CPC SharePoint (3/14/25 update) City requested clarification on if requested OPS files included WCS. (3/19/25 update) CPC informed City that WCS is not requested. (6/4/25 update) CPC informs City that list of pending litigation cases does not allow the CPC to know the names of the involved officers. (6/10/25 update) City provides responsive email</p> <p>(12/26/24 update) CDP uploaded files to Law SharePoint for review (1/9/25 update) Law is reviewing & organizing files by candidates for CDP files (1/23/25 update) Law transferred reviewed files to CPC SharePoint. Files are organized by candidate (3/6/25 update) OPS identifying relevant documentation for production (4/1/25 update) OPS uploaded 52 folders of complaint files associated with Commander applicants. Currently being reviewed by Law. (5/16/25 update) Requested update on OPS files (5/27/25 update) Law estimates completion of OPS files review during first week of June (6/4/25 update) Litigation update document produced to CPC SharePoint (6/10/25 update) City provides names of officers related to listed litigation cases via email OPS files produced to CPC SharePoint</p> <p>Documents produced: - CDP Organizational Structure - CDP Job Descriptions/Duties - Promotion Dates & Transfer Spreadsheet - Candidate files may include: - Performance reviews, use of force, discipline, training, secondary employment, certifications - HR files requested in item h produced in request 2024-CPC-015 - List of pending litigation cases - 33 OPS files</p>
2024-CPC-015	<p>The CPC requests the following records from the Division of Police, Law Department and Human Resources:</p> <ol style="list-style-type: none"> From January 1, 2019- Present. All initial complaint forms (official EEO Complaint form, email complaints, internal memorandums, form 1's or any derivative thereof) making prima facie allegations of bias, discrimination, harassment, retaliation, hostile work environment, or workplace violence made internally by employees or members of the Cleveland Division of Police. Dispositions and investigation summaries from any closed cases in the matters above during this same time period The status of each open investigation resulting from these complaints. 	18-Dec-24	18-Jun-25	Complete	182	<p>(12/30/24 update) City's memo of objections sent to Parties (1/9/25 update) CPC sends response to City's objection on 1/8/25</p> <p>(1/9/25 update) Law is working with IT to provide HR with access to SharePoint to drop files for review and production (1/10/25 update) Hannah to follow up on time for production (2/7/25 update) City stakeholders to meet next week to discuss production timeline (2/12/25 update) All responsive documents produced (2/21/25 update) Status changed to "Partially Complete" pending a response to item 1 (6/18/25 update) HR Director provides responsive email to items 1 & 2 and provided hard copies for pickup. Comm. Adams confirmed receipt of documents. This request is considered complete.</p> <p>Documents produced - 11 closed HR investigations - Open HR investigation spreadsheet - Item 1 documents (hard copies) - Item 2 documents (hard copies)</p>

2024-CPC-016	Based on the complaint below the CPC has asked me to request the following: 1. The names of all the officers who responded to this incident 2. All bodycam footage from each officer involved 3. Any written reports filed **Follow-up email from Comm. Adams: Pleaded also include any dash cam footage from the police vehicles in this request.	24-Dec-24	6-Feb-25	Complete	44	(1/19/25 update) Bodycam produced to CPC SharePoint (2/6/25 update) All documents produced	(1/19/25 update) CDP produced videos for Law review (2/6/25 update) all responsive documents produced CDP considers request complete. Documents produced: - 2 bodycam videos - 1 dashcam video - Email confirming responding officer names & no written reports completed
2025-CPC-001	In an attempt to ensure compliance with these agreements, the CPC makes the following requests: - Any written orders or directives from the Chief's Office or Safety Director to hold the administrative investigations in either incident in abeyance. - Any written requests from the Cuyahoga County Sheriff's Office requesting the concurrent CDP administrative investigation (Garfield) be stopped or postponed. - Any written requests from the Cuyahoga County Prosecutors Office or Cleveland Prosecutors Office requesting the concurrent administrative investigation (Garfield) be stopped or postponed. - Any written requests from the Cuyahoga County Prosecutors Office or the Cleveland Prosecutors Office requesting that compelled interviews of officers involved be delayed. - Any documents requesting or confirming appointments of a "Garrity Review Prosecutor" (Garfield Incident). - Any written requests for an extension of time from the FIT to the Chiefs Office regarding either of these investigations and any response from the Chief's office regarding these extension requests. - Please provide the name of the "Case Master" for the Garfield Incident. - Please provide the name(s) of the Administrative FIT (OIC) for the 146th St. Incident. **Request included as part of a memo to Chief Todd	13-Feb-25	27-Feb-25	Complete	150	(2/27/25 update) All responsive documents produced	Documents produced: - Response memo from Chief Todd - 2 email chain attachments regarding requests for extensions
2025-CPC-002	On behalf of Dr. Adams please find the following request for updated information and/ or records 1. An update on the uploading of the intake forms (Request 2024-CPC-015, #1) 2. An updated open internal complaints spreadsheet (Previously Titled: Open CDP Cases Only 2-06-25) with all information included particularly the "Date received" column. 3. A memo confirming that all information in the spreadsheet is accurate and that no records are missing from the spreadsheet from 2019 - Present. 4. A new expansion of the request for open and closed internal CDP complaints from 2015, 2016, 2017 and 2018.	26-Feb-25	18-Jun-25	Complete	112	(3/14/25 update) City requested clarification on which agency the document request pertained to (3/16/25 update) CPC clarified the requested records pertain to HR records	(5/1/25 update) HR compiling responsive documents (6/19/25 update) Email from HR Director to Comm. Adams states hard copies were produced for item 1 (same as item 1 in "2025-CPC-004"), an updated spreadsheet with data from 2019 - 2025 was provided (responsive to items 2 & 3), and clarification on item 4. This request is considered as complete. Documents Produced: - Updated spreadsheet of CDP case statuses from 2019 - 2015 - Item 1 documents (hard copies)
2025-CPC-003	The Commission is requesting a copy of the latest 2025 CPPA tentative contract that was agreed upon by the Mayor and the Union this month.	17-Mar-25	28-May-25	Complete	72	(5/23/25 update) Requested update on status	(4/4/25 update) The contract is still being drafted and is anticipated to be executed in the next two weeks. (5/28/25 update) Responsive document produced to CPC SharePoint Document Produced: - 2025-2028 CPPA CBA Non-Civilian
2025-CPC-005	The CPC Promotions and Evaluations Committee met Tuesday and made the following request: 1. A complete list of all candidates for each commander position that is either currently open or in interim status. They would like to know how many candidates they will have to review.	15-May-25	21-May-25	Complete	6	Completed	(5/16/25 updates): - Law informed CPC all command staff applications have been available on SharePoint in "2024-CPC-014" since January 2025. All files collated to this folder to centralize produced records from previous requests. - CPC acknowledged update & indicated need for "a list of which candidates are apply for which open commander position" - Law informed CPC of two folders specific to Districts 1 & 2 candidates - CPC requested similar list for each open commander position (5/21/25 update) Responsive document produced to comprehensive folder "2024-CPC-014" Documents produced: - Command Staff Interview DNIs (23-134, 23-184, 23-316, 24-118, 24-283, 25-109) - Excel sheet of applicants (includes rank, name, each position applied for)
2025-CPC-009	The CPC is requesting the pre-disciplinary hearing file, any internal investigation file, and any other evidence, records, documents, files, or otherwise considered, reviewed, and/or used in reaching the results of the pre-disciplinary hearing of Jakimah Dye, former Assistant Director of Budget and Operations, Department of Public Safety, as provided in Chief Director Drummond's correspondence dated April 12, 2024.	17-Jul-25	28-Jul-25	Closed	11	(7/17/25 updates) - City requested clarification regarding how the request relates to the jurisdiction of the Consent Decree - CPC informed City the request is made pursuant to the Commission's broad mandate, authority, and duties outlined in the Consent Decree	The City requested clarification within 7 days of receipt, consistent with the Filed Records Request Process for objections. The City did not receive any disagreements from the MT or DOJ within 7 days of receipt of the objection. As such, the request is closed.
2025-CPC-010	The CPC is requesting the pre-disciplinary hearing file, any internal investigation file, and any other evidence, records, documents, files, or otherwise considered, reviewed, and/or used in reaching the results of the pre-disciplinary hearing of Patrol Officer Dylan O'Donnell #1260, as provided in Chief Director Drummond's correspondence dated July 3, 2025	22-Jul-25	15-Aug-25	Complete	24		(8/15/25 update) Responsive documents uploaded to CPC SharePoint under "2025-CPC-010 & 2025-CPC-011" (17 folders, 92 files) Documents produced (2025-CPC-010 & 2025-CPC-011): - IAPro Reports - Verbal counseling forms - WCS audit logs - CCS documents - CCSD Documents & Correspondence - Cuyahoga County Lab Autopsy - Emails & Correspondence - Form 1s - Investigation Reports - Supplemental Reports - Recommendation Forms - Support Documentation - Synopsis to Chief
2025-CPC-011	The CPC is requesting the pre-disciplinary hearing file, any internal investigation file, and any other evidence, records, documents, files, or otherwise considered, reviewed, and/or used in reaching the results of the pre-disciplinary hearing of Patrol Officer Amanda Rock #1325, as provided in Chief Director Drummond's correspondence dated July 3, 2025	22-Jul-25	15-Aug-25	Complete	24		(8/15/25 update) Responsive documents uploaded to CPC SharePoint under "2025-CPC-010 & 2025-CPC-011" (17 folders, 92 files) Documents produced (2025-CPC-010 & 2025-CPC-011): - IAPro Reports - Verbal counseling forms - WCS audit logs - CCS documents - CCSD Documents & Correspondence - Cuyahoga County Lab Autopsy - Emails & Correspondence - Form 1s - Investigation Reports - Supplemental Reports - Recommendation Forms - Support Documentation - Synopsis to Chief