

## Recommendations by Category

### 1. Can/could be implemented without Ordinance Change

- All complaints filed should go directly to the CPRB. Gatekeeping by Urbana PD and city staff should be minimized. Complaints should only be able to be rejected by the CPRB itself, not staff as this undercuts any semblance of independence. (1.a.)
- CPRB members must be trained and knowledgeable both in the scope of their own duties (the CPRB ordinance is less than 10 pages), and **also Urbana PD policy**. As in Champaign, CPRB members are responsible for understanding the full policies. Upon joining the board, Urbana PD staff should provide board members with an unredacted copy of all policy and training documents [which should also be available at all CPRB meetings for reference] and be given a detailed training seminar. (1.c.)
- The CPRB must be granted full access to Urbana Police Department records without anonymity for officers involved. This will require renegotiating the collective bargaining agreement. In the interim all officers should be assigned unique (anonymous) identifying numbers for the CPRB records so that CPRB can track repeat offenders. (1.g.)
- All past complaints, since at least the establishment of the ordinance should be entered into the CPRB database to track for patterns of complaints. These should include and track race/ethnicity, age, gender and location of the person having the police interaction and the officers involved. (1.h.)
- Each month, the Urbana PD should present a summary of police actions to the CPRB [X number of arrests, use of force incidents/types]. (1.i.)
- The notary requirement for submitting complaints must be eliminated. It is not a state legal requirement as evidenced by the fact that neither the city of Champaign nor Chicago require notarization of complaints. (2.b.)
- The full Urbana PD policy should be publicly available (unredacted besides personal information) so that residents understand their rights/ what to expect when interacting with police and can make informed complaints that allege specific, actionable violations. (2.d.)
- The complaint form must be written in easy to understand, clear language. The form should make clear the complaint process for residents so that they know their rights. It should be available in English, Spanish, French, Chinese and other languages common in Urbana. (2.e.)
- Complaint forms must be available to be downloaded and submitted online. At the time of submission they should be automatically assigned tracking numbers and made available online to CPRB members. Physical complaints should be assigned a number (given to the complainant) and entered into the system upon receipt. (2.f.)
- Printouts of the complaint form must be available at the Urbana Free Library, Cunningham Township, Land of Lincoln Legal, Courage Connection, RACES, PACE, and other locations. (2.g.)
- Physical (sealed) copies of complaint forms should be accepted at other major city buildings such as the Urbana Free Library and Cunningham Township, for internal delivery to the South Vine Street Building. (2.h.)
- All complaints must be assigned tracking numbers ON RECEIPT and publicly recorded [with limited identifying information such as date received and date considered by CPRB]. Rejection of complaints FOR ANY REASON must be listed on the public record. (3.a.)
- The CPRB or HRO must maintain an internal database that tracks all complaints 9rejected or not) including data on:
  - Number of officers involved

- Names of officers involved (after renegotiation of Collective Bargaining)
  - Ward in which the instance occurred
  - Race/ethnicity, gender, and age of persons to whom the alleged harm was done
  - Race/ethnicity, gender, and age of officers involved
  - Type of misconduct alleged (3.b.)
- Every quarter, the CPRB must publicly release statistics listing the cumulative and quarterly number of complaints received:
  - By Ward
  - By Type of Force Used
  - Race/ethnicity, gender, and age of persons to whom the alleged harm was done
  - Race/ethnicity, gender, and age of officers involved
  - By Result (Rejected [and why]/ Considered/ Declared Unfounded, etc.)
  - By Number of unique officers involved (3.c.)
- The city council, Mayor, and CPRB must engage in public outreach and notify the public about the CPRB and the complaint process. All CPRB policies [rules of complaint hearings] should be publicly available and linked from the CPRB page on the website. (5.a.)

## 2. Require an Ordinance Change, but not a Change in Oversight Model

- All full unredacted complaint investigation reports generated by the UPD and city staff should be accessible to CPRB members **and the complainant** prior to the meeting where those findings are to be presented and should be included in the system and accessible in the future by CPRB members. (1.b.)
- The CPRB should be compelled by ordinance to review all use of force instances including Taser use and display and brandishing weapons of any sort. (1.f.)
- The CPRB must be granted full access to Urbana Police Department records without anonymity for officers involved. This will require renegotiating the collective bargaining agreement. (1.g.)
- The CPRB chair/vice should be elected by the board. We recommend rotating chairs for the individual meetings. (1.k.)
- All time limits for submitting complaints must be eliminated. Currently the time-limits policy is being abused. The city has been slow-walking providing the necessary information required to file a complaint to residents (through FOIA) and then rejecting complaints for being filed too late. (2.a.)
- The “First-Hand” account requirement should be eliminated and the definition of “witness” should be broadened and clarified. Anyone who has evidence of police misconduct, whether by video, eyewitness account, or otherwise, should be permitted to report it to the CPRB for consideration. (2.c.)
- Language in the CPRB ordinance that “CPRB review of any complaint shall be suspended at the request of the chief of police or city attorney where a separate criminal investigation is underway or if a civil action is threatened, underway or pending.” must be removed. (2.j.)
- The language in the CPRB ordinance 1932-d should be removed or at least trimmed. (Hearings shall be conducted in closed session and members of the CPRB shall keep confidential all matters disclosed during hearings.) This language is overbroad and precludes collection and publication of any meaningful data for public accessibility. **Every appeal should have a written, public decision report to the public.** (4.b.)

- The council should play a greater role in selecting members of the CPRB. Candidates for the position should be invited to speak at the council meeting where they are being considered for appointment. (4.c.)
- Remove the restriction in the CPRB ordinance that “No person with a criminal felony conviction or plea shall be eligible to serve on the CPRB.” Those with first hand experience with the justice system are the most qualified to serve the public’s interest in police oversight. This is not an elected position, and thus there is no state law limiting participation by convicted persons. This requirement directly conflicts with the existing Urbana Human Rights ordinance section 12-37. (4.d.)
- CPRB members should be limited to two terms (6 years) starting from the original 2007 board assignments to prevent stagnation and ensure meaningful engagement with the public. Upon a supermajority vote of the council one additional term may be granted to a member. (4.f.)
- CPRB members should be subject to removal by majority vote of the council if they willfully neglect their duties (miss 3 or more scheduled meetings, willfully violate the ordinance). (5.c.)
- Upon completion of each complaint review, all members must assert whether they believe all CPRB ordinance procedures were correctly followed, and if not, why not. This should be made part of the public record. (5.e.)

### 3. Require a Change in Oversight Model

- The CPRB must be transformed from an appeals-based board to an actual Review Board with the ability to handle appeals. To this end, the CPRB must be granted subpoena power to summon further testimony and **perform its own investigation in addition** to any internal investigations performed by Urbana PD. (1.d.)
- CPRB members must be allowed to bring forward and open their own complaint to investigate suspected police misconduct regardless of whether a complaint form is filed. CPRB members should be empowered to continue investigating/reviewing complaints even if the original complainant decides not to pursue. (1.e.)
- The CPRB should perform oversight, such a [sic] review of body camera footage and police records, on randomly selected normal arrest (where no complaint has been submitted). (1.j.)
- Exemption from CPRB complaints for animal control officers, parking enforcement personnel, and police service representatives from Section 19-28 should be eliminated. (2.i.)
- The appeals process must be specified clearly in the ordinance and should prioritize giving the complainant the opportunity to voice their concerns directly to the board. Specifically, the complainant should be allowed to be present at all times during the board’s deliberations and **have the option to opt for a fully public meeting.** (4.a.)
- CPRB needs meaningful independence from the core city structure. If it shown that it is impossible for the City to administer meaningful investigations of the police, the role of civilian oversight should be shifted out of the city and into an independent entity such as Cunningham Township. (4.e.)
- CPRB members should be given the authority to request an external investigation of a specific incident. [Like what is going on in the Lewis case.] If a recommendation is approved by the board on a simple majority vote, the city council should be required to vote on action to proceed, and results should be on the public record. (5.b.)

- In the CPRB's quarterly and annual reports they should be required to evaluate the performance of city staff in assisting them in exercising their duty and identify any situations of obstruction where the CPRB ordinance was violated. Written evaluations for CPRB board members will be forwarded to the council prior to annual appointments. (5.d.)