

# Getting to Police Accountability

## A Blueprint for New Jersey

The national conversation on fair and just policing has more urgency now than ever. We in New Jersey have an opportunity to make progress that can strengthen public safety, and enhance civil rights.

Policing varies tremendously throughout New Jersey, a state known as much for its urban centers like Newark and Camden as for the rural communities responsible for our being called the Garden State. Yet the themes of reform remain constant: transparency, accountability, and improving the relationship between communities — particularly communities of color — and the law enforcement officers tasked with keeping us safe.

Police accountability in New Jersey is long overdue. These five policy reforms should be top priorities on the Legislature's agenda for reforming police practices:



### INDEPENDENT PROSECUTORS

when officers kill or seriously injure people.



### BODY CAMERAS FOR POLICE

along with public access to footage and privacy protections.



### END THE POLICING OF LOW-LEVEL OFFENSES

like panhandling, disorderly conduct, and marijuana possession, and expand alternatives to the police's handling problematic behaviors.



### PROHIBIT POLICING FOR PROFIT

by stopping police from unfairly taking property through civil asset forfeiture.



### REQUIRE TRANSPARENCY

and public collection and release of data from police departments.



## INDEPENDENT PROSECUTORS

when officers kill or seriously injure people.

The call for police accountability has reached a crescendo, as a national movement has risen in the aftermath of tragic incidents of fatal police violence captured on film. Americans have sadly come to learn the names of Michael Brown, Eric Garner, Walter Scott, Freddie Gray, and Sandra Bland, all killed by police officers. The names of hundreds of other people killed by police violence each year — disproportionately people of color, and especially Black men — go unknown.

Within days of each other in July 2016, Alton Sterling of Baton Rouge, La., and Philando Castile of Falcon Heights, Minn., were killed by police officers, and their deaths were recorded on video. Here in New Jersey, the death of Philip White in the custody of the Vineland Police Department<sup>1</sup> and other deaths by law enforcement have sparked an outcry from communities about the need for transparency and accountability when an officer kills or seriously injures anyone. New Jersey's system of investigating these kinds of incidents remains opaque and carries with it a significant conflict of interest or, at best, the perception of one.

Currently, when police use deadly force, New Jersey Attorney General's office must be notified. However, unless the Attorney General decides to intercede, the prosecutor for the county where the shooting occurred typically investigates the matter. Generally, the Attorney General does not intercede, and it is left to the county prosecutor to investigate and decide whether to seek an indictment.

The main problem with our existing process lies in the close working relationship between county prosecutors and the very law enforcement officers they are charged with investigating. As matter of course, prosecutors rely on local officers to serve as witnesses in prosecutors' criminal cases, requiring mutual trust, cooperation, and partnership as colleagues. When local prosecutors investigate officers within the same departments they work with intimately on a daily basis, this sudden role-shifting creates



**Require the Attorney General appoint a team of independent investigators and prosecutors when a police officer kills or seriously injures an individual.**



a natural conflict of interest or, at a minimum, a perception of conflict. The decision of whether to bring evidence to a grand jury or to seek an indictment should lie with an independent prosecutor, rather than the local prosecutor, who works with local law enforcement agencies on a regular basis. The prosecution of any

crime identified during the investigation should remain under the jurisdiction of the independent prosecutor.

The President’s Task Force on 21<sup>st</sup> Century Policing — an in-depth analysis developed by law enforcement leaders, advocates, academics, and experts in law and criminal justice to develop methods of strengthening community policing and increasing mutual police-community trust — made two recommendations that specifically address this concern.

Action Item 2.2.2 recommends, “Policies should also mandate external and independent criminal investigations in cases of police use of force resulting in death, officer-involved shootings resulting in injury or death, or in-custody death.”<sup>2</sup> Action Item 2.2.3 recommends “policies that mandate the use of external and independent prosecutors in cases of police use of force resulting in death, officer-involved shootings resulting injury or death, or in-custody deaths.”<sup>3</sup>



## BODY CAMERAS FOR POLICE

along with public access to footage and privacy protections.

Many of the most distressing and now well-known killings of individuals by police officers, from the 2014 death of Eric Garner in Staten Island, N.Y., to the deaths of Alton Sterling and Philando Castile in the summer of 2016, have reached public consciousness only because bystanders filmed them. These events have demonstrated the importance of filming as a critical police accountability tool, when both bystanders and police officers have the cameras.

Officer-worn cameras, one of the most frequently discussed options for reining in police violence, can *only* be an effective accountability tool if used correctly and governed by policies that ensure fairness. Deployment of body cameras can reduce both officers’ use of force and civilian complaints of misconduct, the early research shows.<sup>4</sup> Use of body cameras in New Jersey with appropriate policies governing their use would allow New Jerseyans to more effectively hold the police accountable for misconduct and protect officers from false misconduct allegations.

However, officer-worn cameras also raise the specter of expanded law enforcement surveillance into our everyday lives. The ACLU-NJ supports the deployment of officer-worn cameras *only* with strong protections in place to ensure public access to camera footage and mitigate the potential harms of mass surveillance.

Any use of body cameras must come with clear policies that:

- ◆ Ensure that police recordings continue to be subject to OPRA and other transparency rules with applicable exclusions.<sup>5</sup>
- ◆ Limit officer discretion on when cameras can and cannot record.
- ◆ Create strong disincentives to prevent the manipulation of footage or failure to record interactions.
- ◆ Require clear public notice of filming.
- ◆ Limit the surveillance capacity of cameras to what officers could otherwise see or hear.
- ◆ Control access to body camera footage and prevent unintended or malicious dissemination.
- ◆ Prevent officers from reviewing footage before filing initial arrest or incident reports.
- ◆ Limit retention of body camera footage.

In July 2015, the New Jersey Attorney General released Directive No. 2015-1, which sets rules and procedures for law enforcement’s deployment of body-worn cameras in New Jersey. The ACLU-NJ rebuked the directive for failing to deliver on the promise of accountability and urged more stringent protocols. In particular, the AG’s guidelines prevent members of the public — including victims of police misconduct — from having any access to body camera footage unless they are being prosecuted or file a lawsuit to access the footage.



**Pass legislation establishing policies governing the use of police body cameras in departments across the state that protect the public’s access and the public’s privacy.**



Crucially, those regulations must allow the public, including victims of misconduct, to use the footage to hold police accountable.

The President’s Task Force on 21<sup>st</sup> Century Policing extensively discussed the role of officer-worn cameras and recommended “law enforcement agencies adopt model policies and best practices for technology-based community engagement that increases community trust and access.”<sup>6</sup>



## END THE POLICING OF LOW-LEVEL OFFENSES

like panhandling, disorderly conduct, and marijuana possession, and expand alternatives to the police's handling problematic behaviors.

The aggressive enforcement of low-level offenses — a cornerstone of so-called “broken windows” policing, a deeply flawed theory based on the faulty premise that aggressive enforcement of smaller offenses will decrease criminal activity overall — has led to the criminalization of tens of thousands of people in New Jersey every year for behavior that should not be criminalized to begin with.

Several offenses fall into this category: marijuana possession, panhandling, trespassing, loitering, disorderly conduct, and walking with an open container, for a few examples.

In enforcing these offenses, officers have enormous discretion. The subjectivity involved in policing these offenses encourages departments to implement de facto quota-based practices that can increase conflict and erode trust between communities and the police. Police need not be, and should not be, responsible for managing all community problems. Many behaviors we now consider low-level offenses could be more effectively managed through social service agencies or other types of assistance outside of the criminal justice system.

Enforcement of our marijuana possession laws exemplifies the harms of this style of policing, especially in communities of color. New Jersey police officers make nearly 25,000 arrests per year for marijuana possession<sup>7</sup> despite no indication that its criminal prohibition has any impact on rates of use. Police arrest New Jerseyans for marijuana possession more than any other offense on the books.<sup>8</sup> Keeping marijuana possession criminal leads to untold numbers of unnecessary arrests and exacerbates the particular distrust communities of color often feel toward law enforcement. In New Jersey, Blacks are nearly three times more likely to be arrested for marijuana possession than Whites, despite similar usage rates.

This phenomenon of selective enforcement exists well beyond marijuana enforcement. The ACLU-NJ's *Selective Policing* report demonstrated significant racial disparities in the enforcement of a range of low-level offenses, including marijuana possession, trespassing, loitering, and disorderly conduct, in towns across New Jersey. For example, in Jersey City, we found that Blacks were 9.6 times more likely than Whites to be arrested for these offenses in 2013. In Millville, Blacks were 6.3 times more likely; in New Brunswick, 2.6 times more likely; and in Elizabeth, 3.4 times more likely to be arrested for the four offenses from 2005 to 2013.

A national trend toward decriminalization of low-level offenses and alternatives to the

criminal justice system has already taken root. Marijuana is legal in Colorado, Washington, Oregon, Alaska, and Washington, D.C. Earlier in 2016, New York City adopted legislation to decriminalize a range of “quality of life offenses,”<sup>9</sup> and in Seattle, a ten-year program to divert drug users and other low-level offenders from incarceration has shown tremendous success in reducing recidivism, as well as arrests for drug possession and prostitution.<sup>10</sup>



**The legislature should legalize, tax, and regulate marijuana possession for adults in New Jersey.**



Marijuana enforcement has created a civil rights crisis, and legalization should become an immediate priority for the Legislature. The Senate Judiciary Committee held New Jersey’s first-ever hearing on adult marijuana legalization in November 2015,<sup>11</sup> and legislators must take further steps to end the prohibition of marijuana.



**The legislature should establish a “decriminalization commission” to examine New Jersey’s criminal code and identify which offenses should be reduced in degree or eliminated.**



This commission would also determine which offenses should be dealt with through summonses rather than arrests and which offenses should be made non-criminal or legal. The members of the panel — made up of local elected officials, law enforcement, impacted community representatives, civil rights experts, social service providers, members of the judiciary, and other stakeholders — would undertake a comprehensive study of our criminal laws with the goal of identifying strategies to decriminalize. Ultimately, lawmakers would eliminate the current incentives for arrests such as promotions and grants based on arrest statistics, remove collateral consequences associated with arrests and convictions, and either find or create other venues to mediate “quality-of-life” concerns beyond the criminal justice system.

The President’s Task Force on 21<sup>st</sup> Century Policing urged decriminalization of low-level offenses as well. The authors said law enforcement agencies must “consider adopting preferences for seeking ‘least harm’ resolutions, such as diversion programs or warnings and citations in lieu of arrest for minor infractions.”<sup>12</sup>



## PROHIBIT POLICING FOR PROFIT

by stopping police from unfairly taking property through civil asset forfeiture.

Police in New Jersey can legally seize any property that they claim is related to criminal activity. Police need only to prove the item's relationship to criminal activity by a preponderance of the evidence standard, which is far lower than the "beyond a reasonable doubt" standard needed for a criminal conviction. Prosecutors can then legally sell property as seized assets, even if the owner is never convicted of criminal charges. In fact, criminal charges never even have to be filed. This practice, civil asset forfeiture, distorts the priorities of policing and forces a "guilty until proven innocent" mindset regarding the seizure of people's belongings.

New Jersey's laws make this practice of civil asset forfeiture particularly unfair. A 2015 study by the Institute for Justice, *Policing for Profit*, described New Jersey's civil asset forfeiture laws as "some of the worst in the country" and gave the state a D-.<sup>13</sup>

After a police seizure, if a property owner wants to get her property back, she has to prove that the police wrongfully took it, in effect deeming the property owner guilty until proven innocent. To assert this "innocent owner" defense, the property owner must prove her complete ignorance of the alleged criminal activity, prove no involvement with the alleged criminal activity, and demonstrate she took all reasonable steps to prevent the alleged criminal activity.

Property owners have no right to an attorney in these cases and are often left to navigate the complicated court system by themselves. The high cost of attempting to reclaim one's property frequently prevents many from even trying, meaning that even improper seizures frequently stand unchallenged. In some cases, the cost of retrieving one's property exceeds the value of the property itself, leading some property owners to give up on trying to reclaim their seized items. Clearly the deck is stacked against property owners.

Typically the county prosecutor's office and police department receive the proceeds from the sale of seized items. Although departments are forbidden from using proceeds toward salaries and payroll, they can use the income for business junkets, computers and technology needs, and overtime. A 2014 report showed that in Mercer County, interns in the prosecutor's office drafted most forfeiture motions, and prosecutors seized cash, cars, laptops, a PlayStation 3, flat-screen TVs, a mountain bike, an air conditioner, and even books.<sup>14</sup> A 2014 *New York Times* article reported on a training video by Sean D. McMurtry, chief of the forfeiture unit in the Mercer County Prosecutor's Office, in which he reportedly told the intended audience of police departments: "If you want the car, and you really want to put it in your fleet, let me know — I'll fight

for it.”<sup>15</sup> Such a scheme deprives people of their rights and leads to deep distrust of law enforcement.

Civil asset forfeiture laws create a perverse incentive for law enforcement officers to seize property without due process: the proceeds of such seizures end up directly in the budgets of those officers’ departments. These seizures can help balance department budgets or equip underfunded departments with technology they could not otherwise afford.

In other words, civil asset forfeiture can easily lead to policing for profit.



### End Civil asset forfeiture in New Jersey.



Nebraska banned civil asset forfeiture just months ago, in April 2016. New Mexico banned civil asset forfeiture in 2015.<sup>16</sup> It’s been banned in North Carolina since 2000.<sup>17</sup> Ending civil asset forfeiture draws support from across political and ideological spectrums, with even the head of the Fraternal Order of Police testifying to Congress that the practice should be reined in.<sup>18</sup>

Civil asset forfeiture violates civil rights and preys on those with the least resources available to defend themselves. Our recommendation is to end the practice outright. However, as an intermediate step until the abolition of civil asset forfeiture, these potential reforms could alleviate some of the worst injustices:

- ◆ Limit seizures only to items that are themselves illegal or shown to be direct proceeds from crimes.
- ◆ Place the burden on the government to establish through clear and convincing evidence that the seized items were proceeds from a criminal venture.
- ◆ Require robust public reporting on property seized and income for the department, as well as detailed records of what departments purchase using that funding.
- ◆ Deposit funds from the sale of seized items to the general State treasury rather than to the very prosecutors and police departments that have discretion over making seizures, eliminating a major incentive for taking personal property.



## REQUIRE TRANSPARENCY

and public collection and release of data from police departments.

Transparency is critical to community policing. Simply put, we cannot identify areas of police practices that demand improvement if we do not know what our police departments are doing.

The state of data collection, maintenance, and reporting in New Jersey police departments is dismal.

The ACLU of New Jersey's own attempts to secure basic data from police departments have revealed a shocking absence of standards for data collection, retention, and access. In many cases, law enforcement leadership does not even know what their officers do in the field because of inadequate data collection. Without this information, police executives cannot assess officers' activity or identify inefficiencies, trends, and potential problems.

The ACLU-NJ in late 2015 published a report, *Selective Policing: Racially Disparate Enforcement of Low-Level Offenses in New Jersey*, that found deep racial disparities in the enforcement of loitering, trespassing, disorderly conduct, and marijuana possession in four New Jersey municipalities.<sup>19</sup> To understand enforcement of these offenses, the report's authors coordinated massive records requests from the five cities studied. Through this process, the ACLU-NJ identified extensive failures in data collection and maintenance as a major problem in departments. The police department in one municipality, Asbury Park, could not produce even basic records on the arrests officers made for particular offenses.

**The legislature should mandate uniform, standardized data collection and publication practices for law enforcement activity across departments.**

- ◆ Departments must collect data on stops, searches, arrests, summonses, uses of force, and internal affairs complaints and dispositions.
- ◆ The data should be aggregated by date, location, race, ethnicity, gender, age, limited English proficiency, and the reasons for enforcement activity.
- ◆ New Jersey must mandate standardized online reporting requirements to ensure the public has easy access to such basic transparency data, without having to file costly and burdensome Open Public Records Act requests. As Justice Brandeis once noted, "sunlight is ... the best of disinfectants."<sup>20</sup> Our police departments, like every other government agency, would benefit from that sunlight.

Data transparency is recognized nationally as a best practice for police departments. Indeed, the Newark Police Department has already instituted a robust public reporting requirement for its stop-and-frisk practices — although it has not consistently released that data.<sup>21</sup> Maryland<sup>22</sup> and California mandate data collection on police stops.<sup>23</sup> Here, the New Jersey State Police have regularly reported information about traffic stops since the agency entered into a consent decree with the Department of Justice after revelations of extensive racial profiling on the New Jersey Turnpike.<sup>24</sup>

The final report of the President’s Task Force on 21<sup>st</sup> Century Policing included significant recommendations about data collection, retention, and publication. Recommendation 2.6 advised that: “Law enforcement agencies should be encouraged to collect, maintain, and analyze demographic data on all detentions (stops, frisks, searches, summons, and arrests). This data should be disaggregated by school and non-school contacts.”<sup>25</sup>

## CONCLUSION

Adopting these five reforms would put New Jersey well on its way toward ensuring police departments that operate with the guiding principles of respect, transparency, and accountability. A range of other reforms could further bolster community safety and civil rights. These five planks in particular are among the most fundamental to strengthening public safety and establishing a culture of policing in New Jersey that fosters trust and cooperation between law enforcement agencies and the communities they serve.

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<sup>1</sup>Jessica Beym, *WATCH: New Video appears to show Vineland police punching man who died in custody*, NJ.COM (Apr. 8, 2015, 9:32 AM), [http://www.nj.com/cumberland/index.ssf/2015/04/watch\\_new\\_video\\_appears\\_to\\_show\\_vineland\\_police\\_pu.html](http://www.nj.com/cumberland/index.ssf/2015/04/watch_new_video_appears_to_show_vineland_police_pu.html).

<sup>2</sup>PRESIDENT’S TASK FORCE REPORT, *supra* note 5 at 21.

<sup>3</sup>*Id.*

<sup>4</sup>See Tony Farrar, SELF-AWARENESS TO BEING WATCHED AND SOCIALLY-DESIRABLE BEHAVIOR: A FIELD EXPERIMENT ON THE EFFECT OF BODY-WORN CAMERAS ON POLICE USE-OF-FORCE, POLICE FOUNDATION (2013), <http://www.policefoundation.org/content/body-worn-camera>.

<sup>5</sup>See ACLU-NJ Testimony on Police Body-Worn Cameras before the Senate Law and Public Safety Committee (Jan. 7, 2016), [https://www.aclu-nj.org/files/4714/5219/6836/2016\\_01\\_07\\_test\\_s2399.pdf](https://www.aclu-nj.org/files/4714/5219/6836/2016_01_07_test_s2399.pdf).

<sup>6</sup>PRESIDENT’S TASK FORCE REPORT, *supra* note 5, at 36.

<sup>7</sup>Jan Hefler, *N.J. pot arrests have increased even as legislators consider legalization*, PHILA. INQUIRER (Nov. 24, 2015), [http://articles.philly.com/2015-11-24/news/68513534\\_1\\_marijuana-arrests-marijuana-use-marijuana-crackdown](http://articles.philly.com/2015-11-24/news/68513534_1_marijuana-arrests-marijuana-use-marijuana-crackdown).

<sup>8</sup>NEW JERSEY STATE POLICE, 2014 UNIFORM CRIME REPORT SEC. 3, p. 71 (2016), available at [http://www.njsp.org/ucr/2014/pdf/2014\\_sect\\_3.pdf](http://www.njsp.org/ucr/2014/pdf/2014_sect_3.pdf) (reporting 24,689 marijuana possession arrests in 2014).

<sup>9</sup>Erin Durkin, *City Council approves plan to ease punishments for minor offenses*, N.Y. DAILY NEWS (May 25, 2016), <http://www.nydailynews.com/new-york/nyc-crime/city-council-approves-plan-ease-punishments-minor-offenses-article-1.2649947>.

<sup>10</sup>Saki Knafo, *Seattle's Radical Approach to Drug Crimes Is Working*, CITYLAB (Apr. 8, 2015), <http://www.citylab.com/crime/2015/04/seattles-radical-approach-to-drug-crimes-is-working/389952/>. Santa Fe, NM and Albany, NY are both planning to begin LEAD-style programs in the near future.

<sup>11</sup>Jan Hefler, *N.J. Senate committee holds hearing on marijuana legalization*, PHILADELPHIA INQUIRER (Nov. 18, 2015), [http://articles.philly.com/2015-11-18/news/68356958\\_1\\_marijuana-legalization-marijuana-use-scutari](http://articles.philly.com/2015-11-18/news/68356958_1_marijuana-legalization-marijuana-use-scutari).

<sup>12</sup>PRESIDENT'S TASK FORCE REPORT, *supra* note 5, at 43.

<sup>13</sup>INSTITUTE FOR JUSTICE, POLICING FOR PROFIT: THE ABUSE OF CIVIL ASSET FORFEITURE (2015), <http://www.ij.org/pfp-state-pages/pfp-New-Jersey/>.

<sup>14</sup>Nick Sibilla, *New Jersey Prosecutor's Office Uses Interns to Help Them Take Cash and Cars*, FORBES.COM (Nov. 25, 2014), <http://www.forbes.com/sites/instituteofjustice/2014/11/25/new-jersey-prosecutors-office-uses-interns-to-help-them-take-cash-and-cars/2/>.

<sup>15</sup>Shaila Dewan, *Police Use Department Wish List When Deciding Which Assets to Seize*, N.Y. TIMES (Nov. 9, 2014), <http://www.nytimes.com/2014/11/10/us/police-use-department-wish-list-when-deciding-which-assets-to-seize.html>.

<sup>16</sup>Shaila Dewan, *New Mexico: Governor Signs Bill on Civil Forfeiture* (Apr. 10, 2015), N.Y. TIMES, available at <http://www.nytimes.com/2015/04/11/us/new-mexico-governor-signs-bill-on-civil-forfeiture.html>.

<sup>17</sup>See Institute for Justice, *Asset Forfeiture Report: North Carolina*, IJ.ORG (accessed May 31, 2015, 7:17pm), <https://www.ij.org/asset-forfeiture-report-north-carolina>.

<sup>18</sup>See Kanya Bennett & Nkechi Taifa, *There is Bipartisan Agreement on the 'Uncivility' of Civil Asset Forfeiture*, WASHINGTON MARKUP (Apr. 20, 2015, 3:00 pm), <https://www.aclu.org/blog/washington-markup/there-bipartisan-agreement-uncivility-civil-asset-forfeiture>.

<sup>19</sup>Lynda Garcia, ACLU OF NEW JERSEY, SELECTIVE POLICING: RACIALLY DISPARATE ENFORCEMENT OF LOW-LEVEL OFFENSES IN NEW JERSEY (2015), [https://www.aclu-nj.org/files/7214/5070/6701/2015\\_12\\_21\\_aclunj\\_select\\_enf.pdf](https://www.aclu-nj.org/files/7214/5070/6701/2015_12_21_aclunj_select_enf.pdf).

<sup>20</sup>Louis D. Brandeis, *OTHER PEOPLE'S MONEY AND HOW THE BANKERS USE IT* 92 (1914), New York, Frederick A. Stokes Co.

<sup>21</sup>See Newark Police Department General Order 2013-3 (Jul. 8, 2013), available at [https://www.aclu-nj.org/files/6513/7338/2486/2013\\_07\\_09\\_snf.pdf](https://www.aclu-nj.org/files/6513/7338/2486/2013_07_09_snf.pdf).

<sup>22</sup>See Md. Code, Transp. Law Sec. 25-113, available at <http://law.justia.com/codes/maryland/2005/qtr/25-113.html>.

<sup>23</sup>See Cal. Code, Govt. Law Sec. 12525.5, available at <http://law.justia.com/codes/california/2015/code-gov/title-2/division-3/part-2/chapter-6/article-2/section-12525.5/>.

<sup>24</sup>See UNITED STATES DEPARTMENT OF JUSTICE, A RESOURCE GUIDE ON RACIAL PROFILING DATA COLLECTION SYSTEMS: PROMISING PRACTICES AND LESSONS LEARNED 32-37 (2000), available at <http://justice.utah.gov/Documents/Research/Race/DOJResourceGuide.pdf>; see also Lorie A. Fridell, BY THE NUMBERS: A GUIDE FOR ANALYZING RACE DATA FROM VEHICLE STOPS (2004), available at [http://www.cops.usdoj.gov/html/cd\\_rom/mayors72nd/pubs/ExecutiveSummaryBytheNumber.pdf](http://www.cops.usdoj.gov/html/cd_rom/mayors72nd/pubs/ExecutiveSummaryBytheNumber.pdf).

<sup>25</sup>PRESIDENT'S TASK FORCE ON 21<sup>ST</sup> CENTURY POLICING, FINAL REPORT OF THE PRESIDENT'S TASK FORCE ON 21<sup>ST</sup> CENTURY POLICING 24 (2015) (hereinafter "PRESIDENT'S TASK FORCE REPORT"), available at [http://www.cops.usdoj.gov/pdf/taskforce/TaskForce\\_FinalReport.pdf](http://www.cops.usdoj.gov/pdf/taskforce/TaskForce_FinalReport.pdf). See also PRESIDENT'S TASK FORCE REPORT at Action Item 1.3.1 (pg. 13); Recommendation 2.2 (pg. 20).