

**City of Portland  
Police Citizen Review Subcommittee**

**AGENDA  
November 12, 2025  
6:00 PM**

1. Zoom information

a. **You are invited to a Zoom webinar!**

**When: Nov 12, 2025 06:00 PM Eastern Time (US and Canada)**

**Every month on the Second Wednesday**

**Nov 12, 2025 06:00 PM**

**Please download and import the following iCalendar (.ics) files to your calendar system.**

**Monthly: [https://portlandmaine-gov.zoom.us/webinar/tZ0vceuvqTIqE9HKOIWkciIwYZ-fhrAkphxx/ics?icsToken=DGOvQ-Xd-MOKBygBUQAALAAAACgZuug5fr3DuvxduCr-A-ZxBwTOM\\_cW8NcyYf9xZLkkw8U0DhSVWGY70HMIXF8NCNnEib2o3c8x0h5VJzAwMDAwMQ](https://portlandmaine-gov.zoom.us/webinar/tZ0vceuvqTIqE9HKOIWkciIwYZ-fhrAkphxx/ics?icsToken=DGOvQ-Xd-MOKBygBUQAALAAAACgZuug5fr3DuvxduCr-A-ZxBwTOM_cW8NcyYf9xZLkkw8U0DhSVWGY70HMIXF8NCNnEib2o3c8x0h5VJzAwMDAwMQ)**

**Topic: Police Citizen Review Subcommittee**

**Join from PC, Mac, iPad, or Android:**

**<https://portlandmaine-gov.zoom.us/j/89262779095?pwd=aw06dPv2xDaD6bbrbG3TNSqhNiJbCK.1>**

**Passcode:167916**

**Phone one-tap:**

**+19292056099,,89262779095# US (New York)**

**+13017158592,,89262779095# US (Washington DC)**

2. Call to Order

3. Approval of the October 8, 2025 meeting minutes

a. Attachment

4. Update on the new Civilian Police Review Board ordinance

5. Update of the citizen complaint/commendation process (Joey, Walter & Rachel M.)

6. Discussion of final draft of meeting procedures, public comment & vote (Randall)

7. Discussion of final procedures for IA case presentation and voting process, public comment & vote (Randall)

a. Attachment

8. Report back re: data sharing needs, concerns and recommendations (Rachel S. & Joey)
9. Discussion of the Annual Report, and what might we want in it (Rachel S. & Joey)
10. Discussion of recommendations re: Professionalism SOP (Randall)
11. Report back re: Behavioral Health Unit & Major King (Xavier)
12. Public comment on agenda items
13. Executive session pursuant to 1 M.R.S. Sec. 405(6)(F) to discuss IA2025-12
14. Public comment on agenda items
15. Next meeting's date and agenda topics
16. Adjourn

**MINUTES**  
**POLICE CITIZEN REVIEW SUBCOMMITTEE**  
**October 8, 2025**  
**Meeting Held In-Person (City Hall – room 24)**

Members present: Kaylin Kerina, Chair; Joey Brunelle, Vice-Chair; Xavier Botana; Randall Kilty; Rachel Schlein; and Walter Bihumugani

Members absent: none

Staff present: Associate Corporation Counsel Rachel Millette; Major Dan Hondo; and Tracy Boyd

6:04 Call to order and introductions.

Motion was made by Joey and seconded by Xavier to approve September 10, 2025 meeting minutes. Passage 5-0, Kay abstaining.

**Update on the new Civilian Police Review Board ordinance:**

Rachel shared that the Health and Human Services & Public Safety Committee is meeting next week on October 14, 2025 at 5:30 p.m. via Zoom to discuss the CPRB and that she anticipates that the same topic will be discussed again in a future meeting. Rachel will be presenting to the committee as to where the ordinance stands now and looking for clarity from the counselors as to what areas need particular attention in the current draft so that they can focus on those specific areas in future discussions.

**Discussion of the citizen complaint recommendation process:**

Walter and Joey did not have any new information. Joey plans to connect with Rachel M. for guidance as to whom they should forward their recommendations to.

**Discussion of revised draft of meeting procedures:**

Randall revised the document with suggestions from the subcommittee members and shared those revisions which the subcommittee discussed. Randall will send out a final draft to subcommittee members ahead of the next meeting.

**Present draft procedures for IA case presentation and voting process:**

Randall revised the document with suggestions from the subcommittee members and shared those revisions which the subcommittee discussed. Randall will send out a final draft to subcommittee members ahead of the next meeting.

**Check in on complaint data sharing:**

Rachel S. forwarded a list of the subcommittee's concerns around data sharing to Rachel M., who, in turn, forwarded the list to the City Manager's office, the Police Department, and the IT department. She has not received a response at this time. Among the concerns is the lack of protocols around data sharing. Joey offered to reach out to the Cambridge MA police oversight committee to inquire as to what protocols, if any, they have in place.

**Discussion of recommendations from Randall:**

Randall did not have suggestions prepared, however, he re-capped that this topic was around the definition of professionalism and recommending changes (both specific and general) to PD. Randall asked Major Hondo what the recommendation process would look like and Major Hondo replied that the subcommittee is free to make recommendations to the PD and the PD will respond as to whether they accept the recommendation or not with an explanation.

**Overview of Portland Police Department Behavioral Health Unit (BHU) for PCRS Training:**

Major King provided an overview of the BHU to Rachel S. which he felt was sufficient to fulfill the BHU training requirement. Major King will also make himself available if any subcommittee members have any further questions. Rachel S. will check in with subcommittee members next month regarding their progress towards the required training requirements.

**Public comment:**

George Rheault, Bayside, spoke on the need for training and education in the PD's Behavioral health unit. <https://portlandme.portal.civicclerk.com/event/8155/media> (19:35-19:44)

**Next meeting's date and agenda topics:**

- Update on the new Civilian Police Review Board ordinance
- Update of the citizen complaint/commendation process (Joey & Walter & Rachel M.)
- Discussion of final draft of meeting procedures, public comment & vote (Randall)
- Discussion of final procedures for IA case presentation and voting process, public comment & vote (Randall)
- Report back re: data sharing needs, concerns and recommendations (Rachel S./Joey)
- Discussion of the Annual Report, and what might we want in it (Rachel S./Joey)
- Discussion of recommendations re: Professionalism SOP (Randall)
- Report back re: Behavioral Health Unit & Major King (Xavier)

7:56 Motion was made by Joey and seconded by Walter to adjourn. Passage 6-0.

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Title: PCRS IA Investigation Presentation		

## 1.0 INTRODUCTION

The purpose of this procedure is to ~~provide~~ describe a process for reviewing, presenting, and voting on Portland, ME Police Department (PD Internal Affairs (IA))IA investigations and voting on their dispositions. Police Citizen Review Subcommittee (PCRS) members are encouraged to do their best to review IA investigations impartially and to find ways the Portland, ME Police Department (PD) can improve the investigation process to better serve the residents of Portland, ME. PCRS members should work cooperatively with PD and city staffers to continue to build trust between the community, PCRS, and PD.

~~Note on case presenter to try to keep neutral—do want to have some responsibility on taking note of questions/concerns/comments or follow-up actions~~

~~Can have responsibility to track default to the case presenter, but open to volunteers~~

~~General awareness on presenting with people first language—be aware of trigger language~~

~~Want to add option for having ‘no staff’ section of executive session as an option (in order to hash-out major divergences within PCRS members)~~

~~State statute 1 MRS section 402 and 30A MRS 2702 personnel record—Use these for definition of private/sensitive information~~

~~NOTE: also some records around criminal confidentiality (Rachel M can help)—Randall to email Rachel M to request/remind about it~~

~~Examples for Fair and objective instead of continuing to define them—Randall can make sure the definition matches the intention/definition from PD~~

~~Make sure that it is useful from a reviewers perspective (not from PD perspective would be executing)~~

~~Joey notes: Complainant is a person with feelings and should be considered~~

~~Expand upon the intro/purpose of the IA process to add context~~

## 2.0 SCOPE

This document applies to PCRS IA investigation review, presentation, and voting. PCRS members should focus their reviewing and voting on the IA investigation process (not on PD disciplinary actions, etc.). ~~on the dispositions of IA investigations.~~

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### 3.0 RESPONSIBILITIES

Role	Description of Responsibilities
Chair	<ul style="list-style-type: none"> <li><del>Assigns or d</del>Delegates IA cases to PCRS members as appropriate</li> <li><u>Informs PCRS members that they are assigned to present an IA case</u></li> </ul>
Vice-Chair	<ul style="list-style-type: none"> <li>Fills in for Chair's responsibilities when Chair is absent</li> </ul>
<del>Voting</del> PCRS Members	<ul style="list-style-type: none"> <li>Participate in discussions and vote on IA <del>investigations</del> <u>dispositions</u></li> <li>Present IA case investigations when volunteered or assigned</li> </ul>
<del>Non-voting members</del>	<ul style="list-style-type: none"> <li><del>Participate in discussions</del></li> <li><del>Present IA case investigations when volunteered or assigned</del></li> </ul>

### 4.0 DEFINITIONS AND ABBREVIATIONS

Term	Definition
<u>Sensitive Information</u>	<p><del>As defined in state statute Title 1 MRS section 402 and Title 30A MRS section 2702</del></p> <p><u>Note: there are also rules around criminal confidentiality that should be followed</u></p>
Meeting Attendees	All members of the PCRS ( <del>voting and non-voting</del> ) and all members of supporting city staff (including <del>police department</del> <u>PD</u> ) who are attending the current PCRS meeting
Guest Attendees	Any attendees that are not members of PCRS, city staff, or Police Department
Public Session	Public meeting instance where Meeting Attendees and Guest Attendees both attend
Executive Session	Private meeting instance where no Guest Attendees do not attend due to discussion of private or sensitive information
PD	Portland, ME Police Department
IA	Internal Affairs (of the Portland, ME Police Department)
PCRS	Police Citizen Review Subcommittee

### 5.0 ~~EQUIPMENT AND MATERIALS~~

- ~~N/A~~

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## 6.05.0 PROCEDURE

### 6.15.1 General Etiquette

6.1.1 All Meeting Attendees and Guest Attendees will use and adhere to Robert's Rules of Order to the best of their ability (see Section 7: Resources for link).

### 6.25.2 Assigning and Preparing for IA Investigation Presentations

6.2.1 If an IA investigation is sent to PCRS for review in between PCRS meetings, the Chair will assign a PCRS member to be responsible for presenting the IA investigation at the next meeting.

6.2.1.1 The Chair can use a list of PCRS members to rotate through who will be assigned (~~the member list published online?~~). (e.g. the member list published online). See Section 6.0 References.

6.2.1.2 The list of PCRS members should have newer members at the bottom of the list.

6.2.1.3 It is recommended that new members should not present an IA investigation until they have experienced at least one IA investigation presentation from another PCRS member

6.2.1.4 When possible, a PCRS member will volunteer or be assigned to act as a backup presenter for the IA investigation.

6.2.25.3 \_\_\_\_\_ When a PCRS member is assigned to present an IA investigation, they will prepare a presentation with the following information before the next scheduled PCRS meeting:

- IA Investigation Summary:
  - Timeline: date of incident, date of complaint, date of categorization, date disposition was completed, date sent to command for review, and date disposition notification was sent to complainant and applicable officer/staff
  - Summary of incident (body cam footage, cruiser footage, audio recordings, etc.):
  - Summary of complaint (interview footage, body cam footage, phone recordings, etc.):
  - Summary of supporting documents (Incident reports, Intake statements, relevant PD standard operating procedures, etc.)
  - Summary of IA disposition (from disposition sheet):
- Questions for PD (any clarifying questions about the investigation or incident):
- PD and/or IA Investigation Recommendations (any improvements to IA process that could be made to yield better results in the future):
- Considerations for Complainant satisfaction (any actions that PCRS or PD can take to improve public relations):

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#### 6.35.4 Presenting IA investigations

6.3.1 While still in the Public Session, the Chair will set the agenda for which IA investigations will be presented and discussed in an Executive Session.

6.3.2 After Meeting Attendees have entered the Executive Session, the Chair will guide the meeting through the agenda of IA investigation presentations and resulting discussions.

6.3.3 PCRS members will present the IA investigation summary information that they prepared ~~in advance~~(per-see section 6.2.3) while remaining as neutral as possible, using people-first language, and avoiding trigger words where possible.~~while remaining as neutral as possible.~~

6.3.4 If there are questions or recommendations for the PD that contain private or sensitive information, these should be discussed while PD is present.

6.3.5 PCRS members should discuss their thoughts on the Timeliness, Thoroughness, Fairness, and Objectivity of the IA investigation.

The PCRS member presenting the IA investigation will take note of questions/concerns/comments or any follow-up actions discussed.

6.3.6 ~~If there are follow-up actions, PCRS members may volunteer to take responsibility for them. If there are no volunteers, the IA investigation presenter will take responsibility for the actions. The PCRS member taking note of questions/concerns/comments or follow-up actions~~

6.3.7 If needed, PCRS members can ask for a period of 'no-staff' discussion time to better align their ideas. During the 'no-staff' discussion, PD will be asked to leave the call.

6.3.8 After all IA investigations on the agenda have been presented and discussed to satisfaction, the Chair can move the meeting back to Public Session.

#### 6.45.5 Voting on IA Investigations

6.4.1 Once Meeting Attendees are back in Public Session, the Chair will solicit voting on the Timeliness, Thoroughness, Fairness, and Objectivity of IA investigations that were presented.

6.4.1.1 If there are any IA investigations that were not presented or discussed to a satisfactory state, voting on these IA investigations can be postponed as warranted.

6.4.2 ~~Voting m~~Members of PCRS will vote on the Timeliness, Thoroughness, Fairness, and Objectivity of the IA investigation and may use Attachment 1 for additional guidance.

6.4.2.1 Though there is potential overlap in the 4 voting categories, please keep voting focused on that category only. Examples below:

6.4.2.2 Timely –was the investigation completed within ~45 business days or were affected parties notified of disposition within ~60 business days?

6.4.2.3 Thorough – ~~was~~did the IA investigation ~~thorough~~ (followed all the normal steps) according to police procedures (see attachment 1)?

6.4.2.4 Fairness – do the facts presented in the IA investigation exceed 50% certainty that ~~the exact definition of~~ a PD policy was violated (or not)?

6.4.2.4.15.5.1.1.1 \_\_\_\_\_ If greater than 50% certain that violation of PD policy did occur, was the disposition not cat U?

6.4.2.5 Objectivity — do the facts presented in the IA investigation exceed 50% certainty that there was any bias in the IA investigation?

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**6.4.3** If there are any PCRS members that vote ‘no’ to the Timeliness, Thoroughness, Fairness, and Objectivity of an IA investigation, it is recommended that they give rationale for why they are voting that way.

**NOTE: If the rationale(s) for voting and/or recommendation(s) to PD include sensitive and/or private information, these should be discussed in an executive session and not in a public session**

**6.4.4** If there are any recommendations for the PD that do not contain private or sensitive information, these should also be presented in the Public Session.

**6.4.4.1** For any official recommendations to PD, PCRS should draft a written recommendation that can then be voted on by the PCRS.

### **7.06.0 REFERENCES**

Website Title	Link
Robert’s Rules of Order	<a href="https://robertsrules.org/index.html">https://robertsrules.org/index.html</a>
<u><a href="#">List of PCRS members</a></u>	<u><a href="https://onboard.portlandmaine.gov/board/4371">https://onboard.portlandmaine.gov/board/4371</a></u>

### **8.07.0 ATTACHMENTS**

**Attachment 1:** Additional guidance for voting on Timely, Thorough, Fair, and Objective

**Timely (per PPD SOP Policy # 90):**

1. For in-person complaints, Supervisor must meet with complaint within 30min of arrival at department (if resources allow)
2. Shift commander shall contact complainant within 24 hours or forward to Major for follow-up
3. Investigation by lieutenant completed within 3 days or referred to IA,
4. Investigations completed with professional standard review within 45 days,
5. Notification to PD employee of investigation/rights/duties within 5 business days, unless, in the opinion of the Chief of Police, the release of this information could impede the investigation.

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6. Command review within 10 days (of receipt of investigation?),
7. PD employee advised of outcome of investigation within 60 business days,
8. Professional standards lieutenant to notify PD employee status/delay within 15 days of completion of investigation and submission to staff for review,
9. Determination whether a complaint can be mediated or if it will require an investigation is required within 7 days (cooperative resolution)

**Thorough (per PPD SOP Policy # 90):**

1. Shift commander will meet and interview all complainants unless no merit, then proceed as inquiry instead of a complaint
2. Review option of formal complaint or cooperative resolution (and forwarded appropriate form)
3. Shift commander classification is utilized as follows:
  - . Category 1: conduct has negative impact on operations or image (investigated by officer lieutenant OR IA)
    - a. Category 2: conduct involves serious abuse or misuse of authority, unethical behavior, or serious adverse impact on officer/public safety (investigated by IA)
    - b. Category U: unfounded or within PD policy
4. After complaint is logged, Professional standards lieutenant will:
  - a. Verify the Allegation Category assigned by the receiving shift commander;
  - b. Review the subject officer's IA history;
  - c. Notify the chain of command, to include the Chief of Police;
  - d. Notify, in writing, within five (5) business days, any employee who is the subject of an internal investigation and provide them with a copy of their rights and duties. The notice will include the name of the complainant and the nature of the allegations unless, in the opinion of the Chief of Police, the release of this information could impede the investigation.
  - e. Notify the complainant, in writing, of the receipt of any complaint filed electronically or by mail.
  - f. Refer the complaint to the subject officer's Lieutenant or an Internal Affairs investigator in accordance with the guidelines below.

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5. Allegations deemed Category U by the receiving shift commander will be handled as follows and the Professional Standards Lieutenant will:
  - a) A) Review the complaint form and Shift Commander's intake form and concur with the classification or recommend reclassification.
  - b) Forward the complaint and intake forms up the chain of command to the Chief of Police or designee for review.
  - c) If the chief or designee concurs that the complaint meets the definition of a Category U allegation, notify the complainant and subject officer.
  - d) If the chain of command determines the complaint has merit, reclassify the allegations and process the complaint in accordance with the new category.
6. Investigations by a Lieutenant are as follows
  - . At a minimum, a Lieutenant assigned to investigate a Category 1 Allegation should interview the complainant and the subject officer and review relevant reports, documents, and video.
  - a. If a Lieutenant determines the incident is of greater complexity, or the investigation cannot be completed within 3 business days, he/she can refer the investigation back to Internal Affairs with the concurrence of the Major or higher authority.
  - b. Upon completion of the investigation, the Lieutenant will summarize their findings and recommendations, in writing, and forward up the chain of command for review.
7. Investigations by Internal Affairs Investigators
  - a. Review the initial complaint and compile all related reports and materials in the department's custody.
  - b. Ascertain the specific allegations, note the member(s) involved and the date, time, and location of the incident. Identify any other witnesses to the incident, noting their name(s), address(es) and contact information.
  - c. Compile all relevant reports, statements, and transcriptions for inclusion in the case file.
  - d. Forward the transcription (if any) of each interview to the Professional Standards Lieutenant for review upon its completion.
  - e. Maintain and update the Internal Affairs database for each assigned case.
8. Command will review investigation and reach reviewer will provide written recommendation and justification for action
9. Chief of PD will review all internal investigations and may request additional info

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10. IA will maintain/index all complaints

11. IA will track and analyze complaints to identify training, improve policies, annual state audits, annual reports, notify chief of patterns

**Fair:**

1. Was the IA investigation process impartial and balanced?

. Did everyone who took part in the investigation have a proportional input?

2. Does the IA disposition match the facts of the investigation?

3. Examples of being NOT fair:

a. Body camera footage shows PD acting in a way that breaks PD policy, but the IA disposition concludes that PD did not break any PD policy.

b. Multiple PD personnel performed interviews and investigations, but only the conclusions from one person are represented in the IA disposition.

c. There is evidence of PD acting in a way that matches the filed complaint, but the IA disposition categorizes the investigation as Cat U.

**Objective:**

1. Was the evidence viewed, analyzed, and balanced in an unbiased manner?

d. Was there no evidence of bias during the IA investigation?

2. Examples of being NOT objective:

a. There is evidence that a complainant insulted the PD or made their job difficult and the IA investigation reflects a bias against the credibility of the complainant.

b. There is evidence that a member of PD has a personal connection with the complainant or a material witness in the IA investigation.

c. There is evidence that PD profiled or discriminated against someone based on their skin color, faith, gender, sexuality, or any other personal identifier.

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**9.08.0 APPROVALS**

Contributor (Authored/Approved by)	Signature	Date
Author [Insert Resource Name] NameRandall Kilty]		
Reviewer [Insert Resource Name]		
Approver [Insert Resource Name]		

**10.09.0 REVISION HISTORY**

Revision	DCO Number	Description of Change	Date
A	00001	New Document	???

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~~Attachment 1: Guidance for voting on Timely, Thorough, Fair, and Objective (Page 1 of 3)~~

~~• Timely per policy # 90:~~

- ~~• Supervisor must meet with complaint within 30min of arrival at department (if resources allow)~~
- ~~• Shift commander shall contact complainant within 24 hours or forward to Major for follow-up~~
- ~~• investigation by lieutenant completed within 3 days or referred to IA,~~
- ~~• investigations completed with professional standard review within 45 days,~~
- ~~• notification to PD employee of investigation/rights/duties within 5 business days, unless, in the opinion of the Chief of Police, the release of this information could impede the investigation.~~
- ~~• command review within 10 days (of receipt of investigation?),~~
- ~~• PD employee advised of outcome of investigation within 60 business days,~~
- ~~• professional standards lieutenant to notify PD employee status/delay within 15 days of completion of investigation and submission to staff for review,~~
- ~~• determination whether a complaint can be mediated or if it will require an investigation is required within 7 days (cooperative resolution)~~

~~• Thorough per policy # 90:~~

- ~~• Shift commander meet and interview all complainants unless no merit, then proceed as inquiry instead of a complaint~~
- ~~• Review option of formal complaint or cooperative resolution (and forwarded appropriate form)~~
- ~~• Shift commander classification:
 
  - ~~○ Cat 1: conduct has negative impact on operations or image (investigated by officer lieutenant OR IA)~~~~

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~~○ Cat 2: conduct involves serious abuse or misuse of authority, unethical behavior, or serious adverse impact on officer/public safety (investigated by IA)~~

~~○ Cat U: unfounded or within PD policy~~

~~● After complaint is logged, Professional standards lieutenant will:~~

~~a. Verify the Allegation Category assigned by the receiving shift commander;~~

~~b. Review the subject officer's IA history;~~

~~c. Notify the chain of command, to include the Chief of Police;~~

~~d. Notify, in writing, within five (5) business days, any employee who is the subject of an internal investigation and provide them with a copy of their rights and duties. The notice will include the name of the complainant and the nature of the allegations unless, in the opinion of the Chief of Police, the release of this information could impede the investigation.~~

~~e. Notify the complainant, in writing, of the receipt of any complaint filed electronically or by mail.~~

~~f. Refer the complaint to the subject officer's Lieutenant or an Internal Affairs investigator in accordance with the guidelines below.~~

~~● 5. Allegations deemed Category U by the receiving shift commander will be handled as follows. The~~

~~Professional Standards Lieutenant will:~~

~~a. Review the complaint Form and Shift Commander's intake form and concur with the classification or recommend reclassification.~~

~~b. Forward the complaint and intake forms up the chain of command to the Chief of Police or designee for review.~~

~~c. If the chief or designee concurs that the complaint meets the definition of a Category U allegation, notify the complainant and subject officer.~~

~~d. If the chain of command determines the complaint has merit, reclassify the allegations and process the complaint in accordance with the new category.~~

~~● 1. Investigations by a Lieutenant~~

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~~a. At a minimum, a Lieutenant assigned to investigate a Category 1 Allegation should interview the complainant and the subject officer and review relevant reports, documents, and video.~~

~~b. If a Lieutenant determines the incident is of greater complexity, or the investigation cannot be completed within 3 business days, he/she can refer the investigation back to Internal Affairs with the concurrence of the Major or higher authority.~~

~~c. Upon completion of the investigation, the Lieutenant will summarize their findings and recommendations, in writing, and forward up the chain of command for review.~~

~~• 2. Investigations by Internal Affairs Investigators~~

~~a. Review the initial complaint and compile all related reports and materials in the department's custody.~~

~~b. Ascertain the specific allegations, note the member(s) involved and the date, time, and location of the incident. Identify any other witnesses to the incident, noting their name(s), address(es) and contact information.~~

~~c. Compile all relevant reports, statements, and transcriptions for inclusion in the case file.~~

~~d. Forward the transcription (if any) of each interview to the Professional Standards Lieutenant for review upon its completion.~~

~~e. Maintain and update the Internal Affairs database for each assigned case.~~

~~• Command will review investigation and reach reviewer will provide written recommendation and justification for action~~

~~• Chief of PD will review all internal investigations and may request additional info~~

~~• IA will maintain/index all complaints~~

~~• IA will track and analyze complaints to identify training, improve policies, annual state audits, annual reports, notify chief of patterns~~

~~• Fair:~~

~~• Does the IA disposition match the facts of the investigation?~~

~~• Did everyone who took part in investigation have a proportional input?~~

~~• Objective:~~

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- ~~Is there evidence of bias during investigation?~~
- ~~Bias definition:~~