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Packet Independent Review Bill Police Complaints and Race 10/29/99

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October 29, 1999

97

Mr. Ben Johnson, Assistant to the President  
and Director of the President's Initiative for One America  
The White House  
Washington, DC

Dear Mr. Johnson:

This is written to invite you to a public hearing that the Independent Review Panel (IRP) is holding, in conjunction with Congresswoman Carrie P. Meek and Miami-Dade County Commissioner Dr. Barbara M. Carey-Shuler, addressing "Driving While Black" and "Police Complaints and Race: Independent Review Panel Committee Findings and Recommendations."

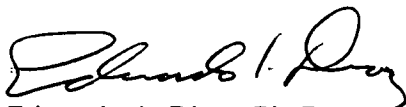
**Date:** Saturday, December 4th, 1999  
**Time:** 10 a.m. to 2:00 p.m.  
**Location:** Joseph Caleb Community Center, Room 110  
5400 NW 22nd Avenue  
Miami, FL 33142

As you know, there is a lot of local, national and international media attention on issues related to "racial profiling", and an honest airing of our local reality is necessary before we finalize recommendations for action. Attached is the IRP Committee Summary for your review, along with the initial response of the Dade County Association of Chiefs of Police.

The format of the December 4th public hearing allows for brief citizen presentations, to be followed by comments by representatives of local police departments. Elected officials and appointed administrative decision makers will be asked to hear out both public and police testimony prior to their remarks.

Please mark your calendar, or send a representative that can declare where you stand. Please call me at 305-375-4880 should you wish a personal briefing on this and other IRP activities, or if you would like a copy of the previously released "Police Complaints and Race: An Independent Review Panel Preliminary Staff Report."

Sincerely,

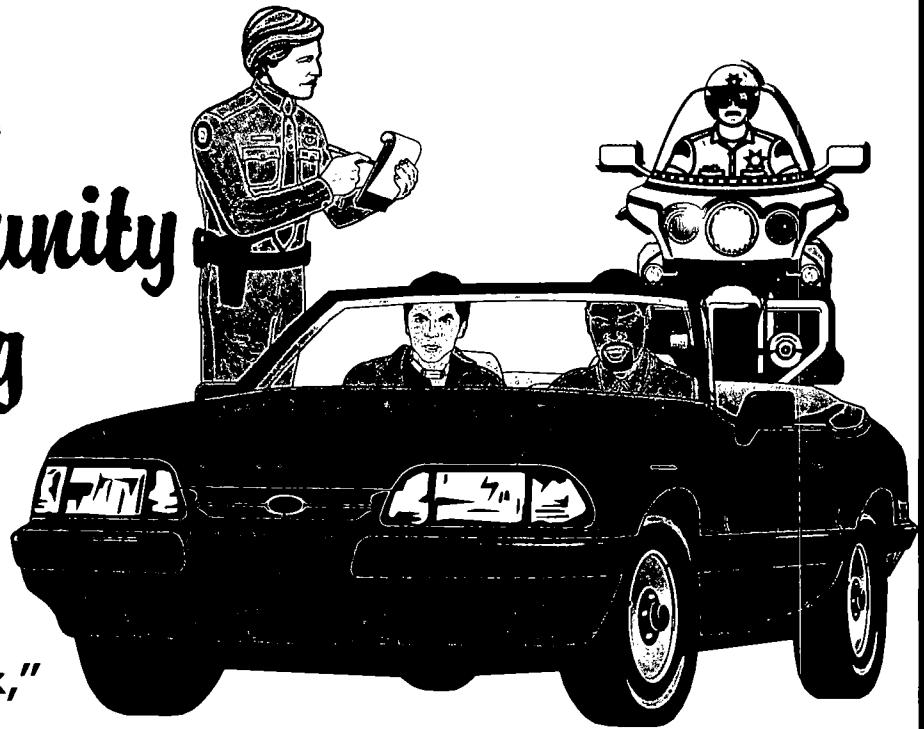
  
Eduardo I. Diaz, Ph.D.  
Executive Director

Enclosure

Send a letter  
telling them  
where we stand.

# Driving While Black

## Help Increase Police/Community Understanding



Recent efforts to address "Racial Profiling," and/or "Driving While Black," have identified a large difference in perception as to the extent of the practice. Some community members say it is a big problem. Some public officials do not see it as a problem. You are invited to speak up about whether or not there is a problem in our community. You can help clarify the truth by speaking from your own experience.

**Thank You!**

**Miami-Dade County**

**Independent Review Panel (IRP)**

*Please join,*

*Congresswoman  
Carrie P. Meek,*

*Commissioner  
Dr. Barbara M. Carey-Shuler,  
and the Independent Review Panel  
at a Public Hearing:*

**Saturday, December 4 th, 1999  
10:00 AM to 2:00 PM  
Joseph Caleb Center, Room 110  
5400 NW 22nd Avenue**

# **INDEPENDENT REVIEW PANEL COMMITTEE MEETING SUMMARY**

**July 22, 1999**

**Meeting Location: 140 West Flagler Street, Conference Room 908  
Miami, Florida**

**Panel Members Present:**

Edward Guedes, Esq., Co-Chair  
Riley Davis, Jr., Co-Chair

**Panel Staff Present:**

Eduardo I. Diaz, Ph.D., Executive Director  
Sagrario Lopez, Senior Executive Secretary  
Carol Boersma, Constructive Conflict Counselor  
Debbie Penha, Conflict Resolution Specialist

**County Officials and Employees Present:** Robert Meyers, Executive Director, and Ardyth Walker, Staff Counsel, Ethics Commission; Carla Cody, Aide-Public Relations Officer, Commissioner Moss' Office; Amy Carswell of the Criminal Justice Council.

Representing the Miami-Dade Police Department/Professional Compliance Bureau: Major David Walker, Captain Russell Fischer and Lieutenant Rex Remley.

**Audience:** The Honorable State Senator Kendrick Meek; Joyce Postel and Shirlee Moreau, Assistants to State Senator Meek.

Representing the American Civil Liberties Union (ACLU) of Florida: Howard Simon, Executive Director; Maria Rivas, Assistant to the Director; Jennifer Ferreri, Intern and Jennifer Lillis, Intern.

James Howe, Executive Director of the National Conference for Community and Justice; Max Rameau, of the Coalition Against Police Brutality.

Representing Municipal Police Departments: Chief Marvin Wiley, El Portal Police Department; Major Paul Shepard, City of Miami Police Department; Sgt. Lonnie Hill, Coral Gables Police Department; Lt. Samuel Ceballos, Jr. and Officer Willie K. Hackett, City of Hialeah Police Department; and Assistant Chief Michael Mills, South Miami Police Department.

Leroy Jones, President and Brian Dennis, Vice-president of the Brothers of the Same Mind.

Frances Robles, The Miami Herald , Reporter.

**Agenda Item #1) Call to Order.** Mr. Guedes and Mr. Davis called the meeting to order at 2:15 p.m.

**Agenda Item #2) Fact Finding Committee to address findings and recommendations pertaining to "Police Complaints and Race: An Independent Review Panel Preliminary Staff Report," and responses from police, community groups and citizens.**

**A. Staff summary of relevant events since the preliminary report was released.**

Dr. Diaz summarized the study which began in the Summer of '98 at the request of Congresswoman Meek and Commissioner Dr. Carey-Shuler.

Several significant events had occurred since the Staff Report release, April 23rd, 1999:

- Written responses were received from the City of Miami Police Department (MPD), Miami-Dade Police Department (MDPD), American Civil Liberties Union (ACLU) and National Conference for Community and Justice (NCCJ), and incorporated in an updated Staff Report.
- Florida State Senator Kendrick Meek established the Driving While Black (DWB) Coalition, in part due to an incident involving MPD Officer Leonard, using volunteer police officers to help citizens better understand appropriate stops and how to best react.
- The Florida legislature allowed two bills to die that aimed at having the Florida Department of Law Enforcement (FDLE) gather traffic stop statistics to, in part, address racial profiling. Senator Daryl L. Jones sponsored SB 1456 and Representative Beryl D. Roberts-Burke sponsored HB 769.
- President Clinton issued a Presidential Directive on June 9th, 1999, calling for Federal law enforcement agencies to collect information pertinent to Racial Profiling.
- The IRP Chair and staff met with Congresswoman Carrie P. Meek and Commissioner Dr. Barbara M. Carey-Shuler and both concurred on the need for additional fact-finding. It was agreed to hold an evening IRP Community Meeting in the County Commission Chambers.

Dr. Diaz distributed several documents: "What Can Psychology Tell Us About Prejudice, Discrimination, and Racism? What is Prejudice? What is Racism?" published by the American Psychological Association; a Press Release by President William J. Clinton, entitled "Fairness in Law Enforcement: Collection of Data;" and a booklet titled, "The Law and You/Guidelines for Interacting With Law Enforcement Officials."

## B. Public Hearing

### 1. Comments from Citizens.

American Civil Liberties Union (ACLU) - Executive Director Howard Simon and Maria Rivas, Assistant to the Director.

- The data in the IRP preliminary report supports the allegation that Blacks are more likely to be targets of police attention and subject to arrest than others.
- The allegation concerning "Use of Force" complaints of Blacks being inordinate compared to those of non-Black complainants is also substantiated by the data.
- The rate of MDPD sustained internal affairs complaints is over twice the national average and therefore a cause of concern as a documentation of excessive wrongdoing.
- The ACLU concurred with the finding made in the IRP preliminary report, that no one has yet gathered reliable data to determine the extent of the practice of racial profiling in Miami-Dade County.

The ACLU recommends:

- That police agencies initiate the voluntary collection of detailed information with regard to race, ethnicity, gender, and age, from **all police initiated contacts with citizens** (whether or not the contact resulted in an arrest), which would form a database from which allegations of racial profiling could be evaluated.
- That all police departments in Miami-Dade County have "Anti-Discrimination" and "Use of Force" policies. The ACLU encouraged the Panel to provide models of such policies in its final report.
- That additional input be sought from African-American males whose complaints have been sustained by the MDPD.
- To evaluate the allegation by African-American males that their complaints are not expeditiously pursued, the ACLU recommends that the report describe, the entire complaint process, including such things as whether it is a "complainant friendly" process.

Brothers of the Same Mind - President Leroy Jones made the following comments:

- The Organization has received many complaints from members of the Black community. Most have expressed their discomfort in reporting officers whom they are likely to see again, because the officers are assigned to work in their neighborhood. Many fear filing a complaint due to possible retaliation.
- MDPD Internal Affairs scrutinizes complaints during the intake process to determine whether or not the complaint warrants investigation. Since MDPD

assigns a case number **only** to those complaints which meet its criteria for formal investigation, its low complaint rate is inaccurate.

- The Organization supports the collection of detailed information with regard to race, ethnicity, gender and age from all police initiated contacts with citizens.
- Use of Force complaints have increased over the past five years.

Mr. Jones recommends:

- That MDPD keep a log that shows **all** complaints made.
- Implementation of an "Early Warning System" and "Use of Force" policy by all agencies.
- A mechanism that would encourage "good" cops to report "bad" cops.
- That the IRP be given subpoena power.
- That another entity be the recipient of complaints, due to the large number of people who attempt to file complaints only for their complaints to be rejected by the police departments.

The Coalition Against Police Brutality & Harassment - President Max Rameau made the following comments:

- There are social and economic factors that affect the relationship between the police and the Black community. Demonization of social problems among young Black males by the media is a contributing factor.
- Differential treatment exists in the manner in which most police officers treat Blacks in comparison to Whites. There is a double standard in the way police treat a potential suspect in a White neighborhood vs. Black neighborhood.
- There are politicians who develop "get tough policies" that are not well thought out.
- There is gross under reporting of complaints by the general public, because:
  - ♦ Internal Affairs complaint intake processes are not "complainant friendly." There is a lack of willingness on the behalf of the police to take a complaint against a fellow officer.
  - ♦ All complaints are not accepted, and few of those that are accepted are sustained.
  - ♦ The lack of disciplinary action taken against officers who commit wrongdoing.
- Data should be collected that reflects the racial composition of police officers who receive sustained complaints vs. non-sustained complaints.
- The current Independent Review Panel needs power.

State Senator Kendrick Meek - Senator Meek stated that people are still in denial about racial profiling. A comprehensive action plan which involves the community, the police, elected officials, persons at the executive level, etc., is needed. Senator Meek spoke on his recent community initiative, Driving While Black Coalition, which consists of 99% Black officers.

Senator Meek encourages and supports:

- The implementation of an "Early Warning System" in all police departments.
- The implementation of a "Racial Profiling" policy.
- A more "User Friendly" police complaint intake process.
- Educating the public on how to file a complaint with police departments.
- Educating/training officers to focus on crime prevention and not number of arrests made.
- Police workshops in the community or on the air to educate the community on what to do when stopped by a police officer.
- Community oriented policing.
- Data collection (race, ethnicity, gender, and age) throughout the State of Florida of all police initiated contacts with citizens, whether that contact is with a person who is driving or walking.
- Legislation regarding racial profiling.

Criminal Justice Council - Amy Carswell appeared on behalf of Jack Marshall. Ms. Carswell stated that "Walking While Black" is just as important as "Driving While Black." She invited the IRP to utilize the Council as a resource.

Brothers of the Same Mind - Vice President Brian Dennis made the following comments:

- Opa-Locka Police Department had an increase in arrests.
- Differential treatment exists in the way most police officers treat Blacks in comparison to Whites.
- More power should be given to the IRP.

## **2. Comments from Police Departments**

Miami-Dade Police Department, Professional Compliance Bureau (PCB) - Major David Walker made the following comments:

- MDPD has 4,000 employees, of which 2,800 are sworn officers.

- MDPD does not condone misconduct and officers are aware of the consequences if abuse occurs.
- MDPD does not have a specific policy regarding Racial Profiling, but does have policies that address fairness and integrity towards the public.
- MDPD Internal Affairs (IA) documents all complaints. Complaints that warrant a formal investigation are given a case number and those that do not are documented on a Contact Sheet. There are no case numbers for the complaints documented on the Contact Sheet.

City of Coral Gables Police Department - Sgt. Lonnie Hill made the following comments:

- The IRP preliminary report, shows the number of arrests and the number of complaints, but it does not show which complaints are internal (employee vs. employee) and which are external (public vs. employee). The Coral Gables Police Department records all complaints. Three quarters of the Department's complaints are in-house complaints. Therefore, there is no correlation between arrests and complaints.
- For proper statistics to be taken and comparisons made, it is important that the final report contain information on how complaints are defined by each police department.

City of Miami Police Department - Major Paul Shepard made the following comments:

- The City of Miami Police Department wants its officers to check out reasonable suspicion, but not based on race and other irrelevant factors.
- If systematic collection of data to determine the extent of racial profiling becomes effective in South Florida, one must consider the racial composition of the areas where officers are assigned.
- Field Interrogation Cards are filled out when there is reason to believe that the person stopped may be connected to a crime but are not filled out on all stops.
- Miami does not have a policy of racial profiling. The Department does not perceive any problems with President Clinton's executive order to collect data.

City of South Miami Police Department - Assistant Chief Michael Mills made the following comments:

- He concurs with ACLU that there should be a systematic collection of data.
- The collection of data to determine if racial profiling exists may cause some officers to perceive that they cannot stop a percentage of Blacks greater than the percentage of Blacks in the general population. Therefore, the resulting data may not reflect racial profiling.
- South Miami Police Officers are trained to make stops based on reasonable suspicion. Race is not supposed to be an issue.

- The Department does not have a policy on profiling.
- How complaints are tracked varies among the police departments. When collecting data on complaint rates, this should be considered so that valid comparisons can be made.

City of Hialeah Police Department/Internal Affairs - Lieutenant Samuel Ceballos, Jr. made the following comments:

- Complaints in Hialeah are classified and all are assigned a case number. The Chief of Police may change a classification or determine need for further investigation.
- The Hialeah Police Department has no specific policy on profiling.

### **3. Closure of Public Hearing**

Both co-chairs thanked the members of the public and the representatives from the police departments for their attendance and participation. Dr. Diaz noted that none of the testimony heard disputed the findings and recommendations of the preliminary report. Mr. Guedes stated that the issues presented will be summarized and the Independent Review Panel committee's recommendations will be submitted to the full Panel, for its review.

#### **Agenda Item #3) Next Step: Community Meeting.**

Dr. Diaz invited the public to the follow-up community meeting, to be announced. Congresswoman Meek and Commissioner Dr. Carey-Shuler may be present.

**Agenda Item #4) Adjourn.** There being no further business, the committee meeting was adjourned at 5:15 p.m.

**Committee Findings and Recommendations**  
**for consideration by the Independent Review Panel**

**Findings**

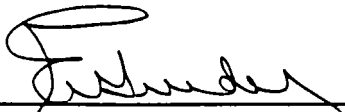
1. Preliminary evidence compiled reflects that the number of Black males who are arrested is disproportionate to the overall representation of Black males in the general population. Why this is so remains to be clarified.
2. There is a perception in the African-American community that young African-American males are stopped by law enforcement officers simply because of the color of their skin.
3. In 1994, 50% of the 68,675 arrests by Miami-Dade Police Department (MDPD) were of Black people compared to 1998 when it was 47.9% of 59,539 arrests.
4. The 1994 MDPD arrests resulted in a total of 45 use of force complaints while 1997 arrests resulted in 123 use of force complaints, yet there were 8,869 fewer arrests in 1997 than 1994. Use of force complaints went down to 93 in 1998 with 267 fewer arrests than in 1997.
5. Police race profiling practices are of national and international concern but no one has yet gathered reliable data to determine the extent of the practice or the intention underlying the arrest or stop.
6. Information provided indicates that most local law enforcement agencies provide some degree of training to their officers regarding race relations and some also have written nondiscrimination policies in place. However, it appears that few, if any, have a written policy, or standard operating procedure, that specifically prohibits or addresses racial profiling.
7. Statistics that would be meaningful, and that would help determine if law enforcement actions are racially motivated, are not currently being collected. Additionally, comparable data is lacking with respect to whether, and to what extent, race is an issue in different kinds of arrests, i.e., those of material impact on public safety (murders, burglaries, robberies, etc.) and those of arguably lesser impact (loitering, disturbing the peace, etc.).
8. Some small local police departments do not have computerized information systems or resources to devote to gather information at this time.
9. Written responses to the Preliminary Staff Report were received from the City of Miami Police Department (MPD), Miami-Dade Police Department (MDPD), American Civil Liberties Union (ACLU) and National Conference for Community and Justice (NCCJ), and attached to the updated Staff Report.

10. Florida State Senator Kendrick Meek has established the Driving While Black (DWB) Coalition, in part due to an incident involving MPD Officer Leonard. The purpose of the DWB Coalition is to assist citizens, particularly those in the African-American community, through the use of role-playing on how to interact with law enforcement officers during stops or arrests.
11. Senator Daryl L. Jones sponsored SB 1456 and Representative Beryl D. Roberts-Burke sponsored HB 769, both of which were intended to require the Florida Department of Law Enforcement (FDLE) to gather statistical information regarding traffic stops, in order to address the issue of racial profiling. Neither bill was adopted by the Florida Legislature.
12. President Clinton issued a Presidential Directive on June 9th, 1999, calling for Federal law enforcement agencies to collect information pertinent to racial profiling "to the extent practicable."
13. The IRP Chair and staff met with Congresswoman Carrie P. Meek and Commissioner Dr. Barbara M. Carey-Shuler and both concurred on the need for additional fact-finding. It was agreed to hold an IRP Community Meeting in the near future.
14. Some law enforcement agencies have expressed a concern about the enforceability of any data collection system intended to target racial profiling. Additionally, a concern has been expressed that the implementation of such a system might cause law enforcement officers to refrain from making legitimate stops, to avoid the perception that their actions might be discriminatory.
15. Some African Americans fear retaliation if they report wrongdoing by an officer they are likely to encounter again, such as a neighborhood officer. Some feel that they are treated harsher when stopped by law enforcement officers in comparison to Whites.
16. There is the perception in the African-American community that Internal Affairs sections are not complainant friendly. African-Americans feel that complaints that are accepted for investigation are not expeditiously pursued.
17. Complaint statistics from one police department cannot be compared with statistics from other police departments because there is widespread variation in: the definition of a complaint, criteria for acceptance, the screening process, classification and recordation.

## **Recommendations**

1. A consortium of representatives, from local law enforcement agencies and university faculty with expertise in criminal justice, community relations and data evaluation, should be convened by the Dade County Association of Chiefs of Police. This group would develop local law enforcement standards and would design a data gathering system to monitor arrest quality and zero tolerance of racism.

2. The IRP should contribute to local constructive police/community dialogue by joining the American Psychological Association's National Conversation on Racism, distributing related materials and sponsoring events.
3. Elected officials should be informed and asked to consider appropriate legislative action to encourage or require local police departments to collect race, gender, age and ethnicity data on all arrests and stops.
4. All local law enforcement agencies should adopt a written policy, or standard operating procedures, that specifically prohibits racial profiling and defines the term. The definition of the term "racial profiling" could be provided through the consortium convened pursuant to Recommendation No. 1, above.



Edward Guedes, Esq., Co-Chair

9-2-99

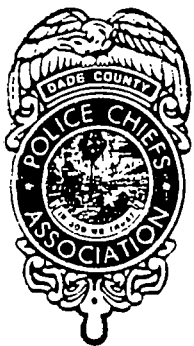
Date



Riley Davis, Jr., Co-Chair

09/01/99

Date



# *Lude County Association of Chiefs of Police*

*P.O. Box 546706  
Surfside, Florida 33154-0706*

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*Director Carlos Alvarez*  
*Miami-Dade Police*

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September 27, 1999

Eduardo I. Diaz, Ph.D.  
Executive Director  
Independent Review Panel  
140 West Flagler Street, Suite 1101  
Miami, FL 33130-1561

Dear Dr. Diaz:

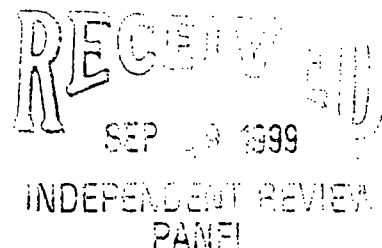
I am in receipt of your recent letter requesting the position of the Dade County Association of Chiefs of Police (DCACP) regarding the Independent Review Panel (IRP) study, Police Complaints and Race: Findings and Recommendations.

The DCACP represents all law enforcement agencies in Miami-Dade County. Our organization maintains a zero tolerance against prejudice, discrimination and racism. We prescribe to a standard of conduct that is based upon the fair treatment of all individuals. Additionally, the DCACP is currently embarking upon the establishment of a standardized and consistent code of ethics, which reiterates the commitment of Miami-Dade County law enforcement agencies to uphold the highest standards of integrity and ethical conduct. The DCACP also endorses the thorough and forthright investigation of all allegations of police misconduct and appropriate discipline in instances where misconduct is substantiated.

The DCACP is pleased to participate in the efforts of the IRP regarding this important issue. Please be assured of our cooperation in this and other matters of mutual concern.

Sincerely,

Carlos Alvarez, President  
Dade County Association of Chiefs of Police



# **Police Complaints and Race:**

## **An Independent Review Panel**

### **Preliminary Staff Report**

**July 16, 1999 UPDATE**

#### **Independent Review Panel**

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Dr. Eduardo I. Diaz, Executive Director

Carol Boersma, M.S.W

Debbie Penha, B.A

Sagrario Lopez, B.A

Ana Timiraos

The current investigation began June 9, 1998, when Miami-Dade County Commissioner Dr. Barbara M. Carey-Shuler shared a letter from Carrie P. Meek, Member of Congress, asking for an Independent Review Panel inquiry addressing police brutality complaints from young African-American males.

The Independent Review Panel (IRP) was established by the Board of County Commissioners in 1980 to conduct external fact-finding and dispute resolution pertaining to serious complaints or grievances that might impact the public trust. The process employed allows for all sides to be heard with ample opportunities for clarification of testimony and information.

What follows is a "Preliminary Staff Report" and reflects a start, not an end product. Hopefully, the contents will stimulate all who read it to formulate appropriate questions and clarifying statements for the next two stages of the process. The goal is to achieve honest and constructive dialogue about the issues, in order to improve police/community relations.

The second stage will be an "IRP Mediated Fact-finding and Dispute Resolution Committee Meeting." The interim report generated by this committee will have the benefit of additional input and will be aired at a public hearing held during a meeting of the IRP, the third stage of the process. The final Independent Review Panel report will represent the position of the volunteer citizens who serve as Panel members and will include Panel findings and recommendations.

### **Materials Reviewed to Date:**

Letter from Congresswoman Carrie P. Meek, correspondence, staff notes, media tapes and articles, Human Rights Watch Shielded From Justice: Police Brutality and Accountability in the United States report, International Association of Chiefs of Police (IACP) Use of Force report, Miami-Dade Police Department (MDPD) response, responses from 26 local municipalities, information from site visits to the one jail and 3 State Prisons (Everglades, Dade and Broward ), oral testimony of citizens, papers presented at International Association of Civilian Oversight of Law Enforcement (IACOLE) conference, Police Conduct Ethical Standards of the State of Florida's Criminal Justice Standards and Training Commission, American Psychological Association (APA) National Conversation on Racism publications and the U.S. Department of Justice report on Police Integrity: Public Service With Honor.

### **Investigation Concern:**

The IRP has as a priority the nurturing of constructive police/community relations and that priority forms the basis for this investigation, which addresses police use of force and selective arrest concerns in Miami-Dade County, focusing on the experience of young African-American males. All police agencies in the County were asked to provide policy statements and factual data for public review.

A staff content analysis of Congresswoman Carrie P. Meek's letter revealed three clearly discernible allegations to explore:

1. Young Black males are more likely to be targets of police attention and subject to arrest than others.
2. Young Black males' complaints of police brutality are inordinate compared to those of non-Black complainants.
3. The complaints of young Black males are not expeditiously pursued compared to those of others.

The police departments were asked to provide:

"Comparisons that shed light on the preponderance of selective arrests of young Black males ... as well as comparisons of excessive use of force complaints."

The departments were asked to include, but not be limited to:

- "a differential arrest rate matrix (i.e., age, gender, race, prosecution, etc.)
- a differential rate matrix of police misconduct complaints
- a statement of actions taken to identify officers who demonstrate racist attitudes
- any zero tolerance to racism policy statement in effect or contemplated
- data reflecting trends pertaining to Internal Affairs complaints over the last five years (i.e., types of complaints, number sustained, not sustained, etc.)."

MDPD Director Carlos Alvarez promptly provided useful available information. Chief Richard R. Barreto, President of the Dade County Association of Chiefs of Police, was most helpful in securing responses from the municipal police departments.

Thanks to Chief Barreto, a second request for information was sent to the municipal police agencies resulting in a much improved response rate. His request focused on the following four items:

1. "The total number of Internal Affairs complaints for each of the past five years, as well as identifying how many of said complaints were for use of force.
2. Whether or not your police department has any type of early warning system to identify potential problems with officers.
3. The total number of arrests for the past five years that your department has made.
4. Any policy statement regarding discrimination and racism, and any policy statement relating to use of force."

#### **LOCAL RESPONSE SUMMARY:**

The MDPD response is attached and represents the most comprehensive attempt to address the issues.

Tables and charts are included to elicit ideas about how to best reflect the reality of the complaint processes situation in greater Miami-Dade County. It is important to clarify at the onset that this information is real but can be interpreted in multiple ways. A fair and open discussion of the different perspectives is what is sought.

Peruse and question, keeping in mind that no one is currently compiling all of the information necessary to fully address the subject or even the comparison data initially requested.

It is anticipated that the IRP will consider recommendations, at the end of the investigatory process, to remedy the lack of academically defensible data collection and analyses systems.

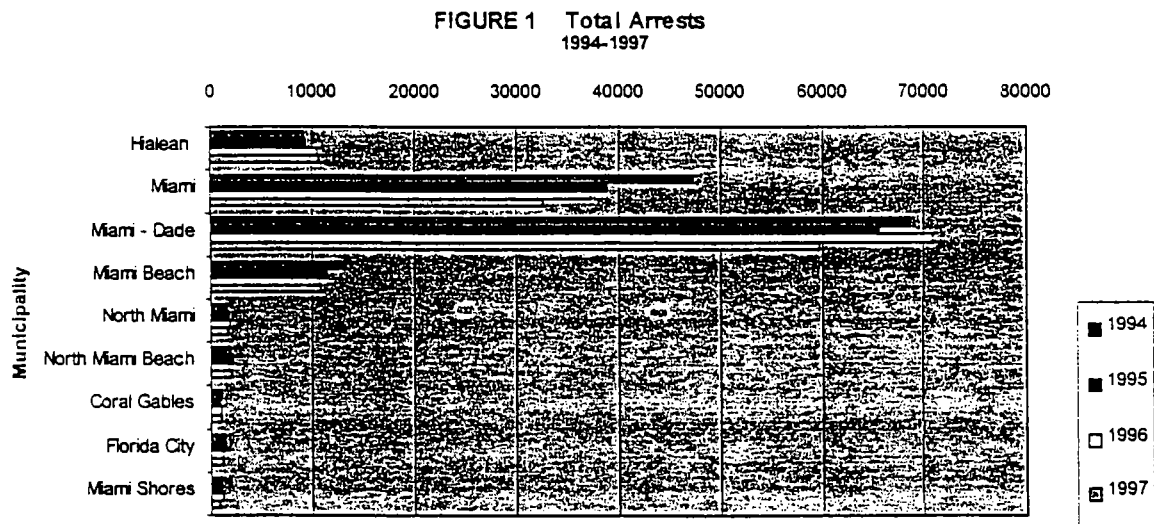
11

**Legend**  
 TA=Total Arrests  
 TC=Total Complaints on Record  
 UOF=Use Of Force Complaints  
 NIO=Not In Operation  
 NP=Not Provided  
 ( )=Data Given In Another Form  
 (\*)=Partial Year

## Chart 1 Police Department Responses

This reflects 1994-1997 data provided by the agencies (1998 data was partial year information) and allows for some trend analyses. The chart also reflects that all agencies reporting have clear Use of Force policies and almost all have Anti-Discrimination policies of some sort (Few express clear "Zero tolerance of Racism" language).

Less than half of the agencies reported they have an Early Warning System to track potential problem Officers but, it is clear that most of the agencies are very small units and have less sophisticated resources available.



**Figure 1 1994-1997 Total Arrests**

This is a graphical representation of how MDPD and the City of Miami Police Department (MPD) dominate arrest statistics, with Hialeah (HPD) and Miami Beach (MBPD) being distant mid-sized entities. The vast majority of agencies arrest less than 2000 people per year. Miami and Miami-Dade arrest trends may reflect the general decrease in crime reported nationwide, the impact of Community Oriented Policing strategies, the impact of policy decisions, all of the above or none of the above.

FIGURE 2 1994 Complaint Rates

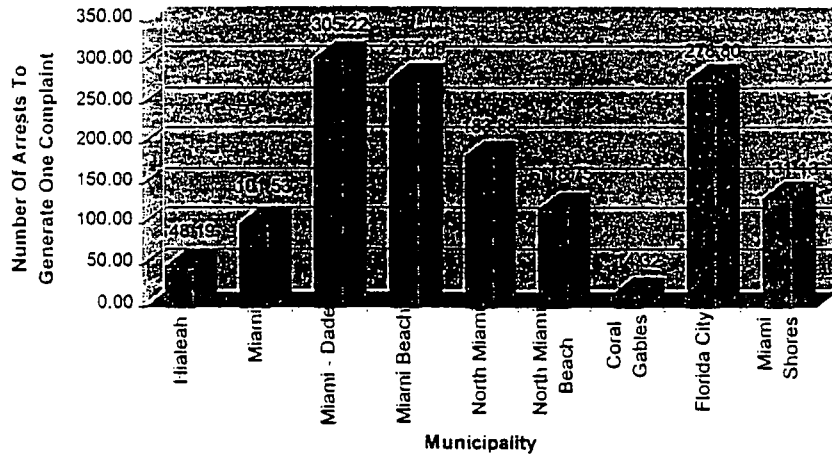


FIGURE 3 1995 Complaint Rates

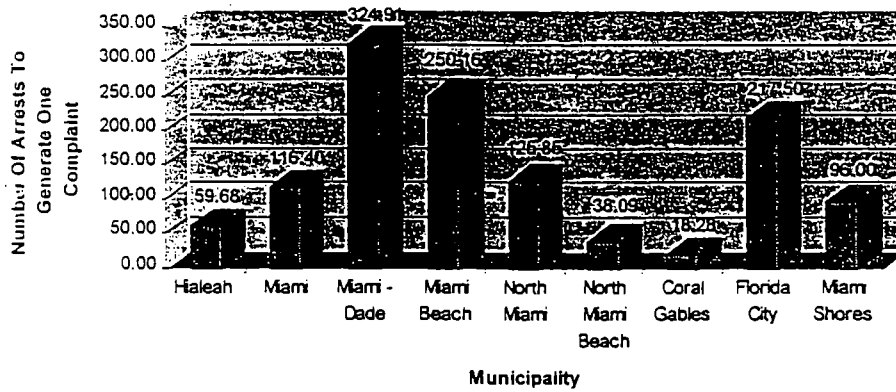


FIGURE 4 1996 Complaint Rates

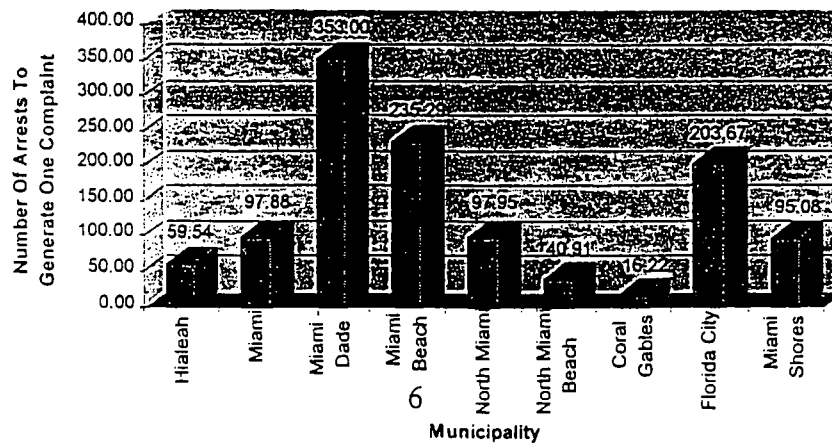
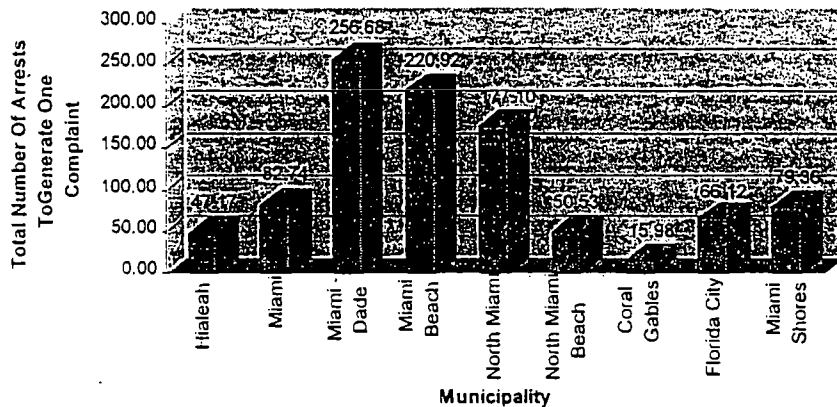


FIGURE 5 1997 Complaint Rates



Figures 2-5 Complaint Rates 1994-1997

These figures look at the large, mid-sized and select small departments to contrast how many arrests it takes to generate a citizen complainant. This documents considerable variability between departments. It appears that everyone is different and one should not casually compare departments because of the “apples and oranges” issue.

What is an acceptable rate? Are MDPD and Miami Beach officers better trained to deal with the public? Are folks from Coral Gables more likely to file complaints than those who live in Miami? Are Hialeah Officers more likely to offend the public?

Some departments are liberal in what they call a complaint and some only report complaints that have been screened. The lack of uniform complaint standards makes it hard for the public to assess whether a department is out of line with best practices.

FIGURE 6 MDPD Black Arrest Percentage

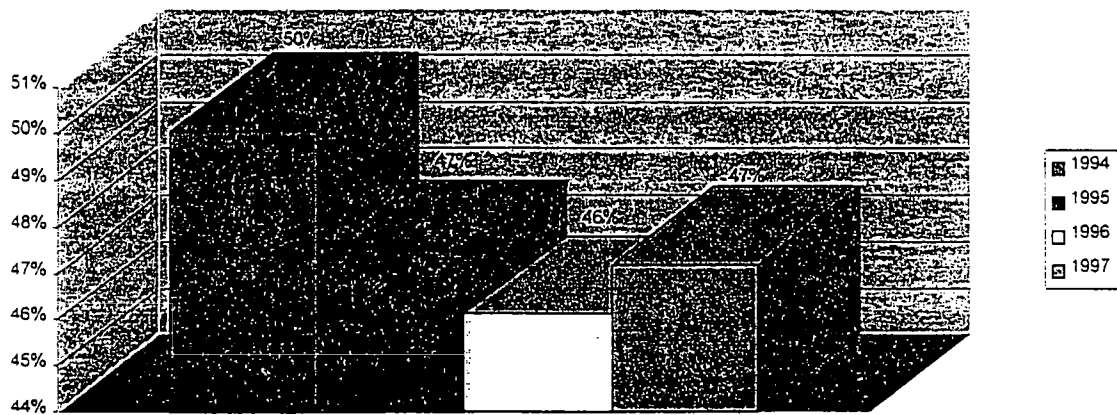


FIGURE 7 MDPD Black Arrest Proportion

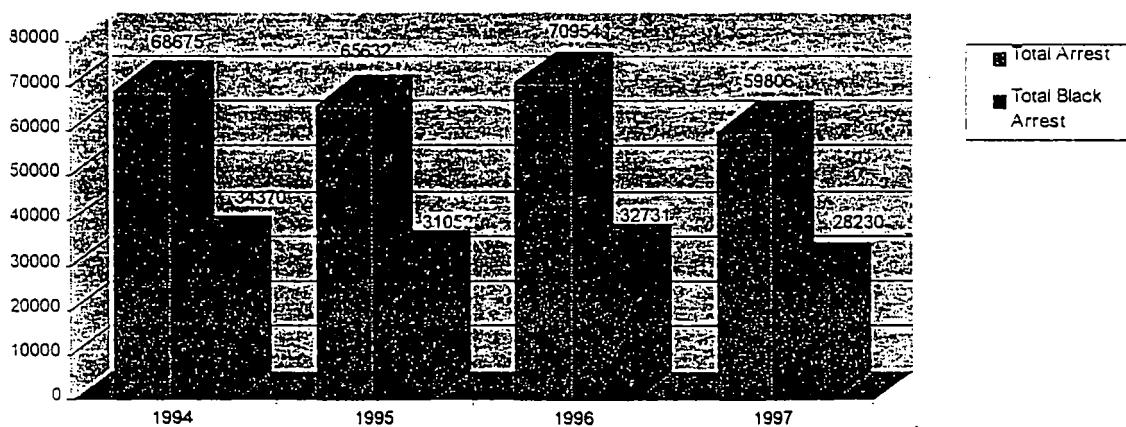


Figure 6 and 7 MDPD Black Arrests 1994-1997

These figures depict the over representation of Black arrestees, in light of the population demographics of the County, and the relatively stable trends in MDPD statistics over the four years. That 46% to 50% of all MDPD arrests impact Blacks does not prove institutionalized racism or malicious intent to target Blacks. But, it does call for constructive discussion of why this is so, and what to do about it locally.

One cannot improve Police/Community relations and help avoid perceptions of injustice unless the truth is aired. More information is needed to answer important questions.

Are Blacks more prone to be arrested or more prone to do crimes? Are high Black arrest rates indicative of unintentional effects of crime fighting policies? Will aggressive enforcement of a "Zero Tolerance to Racism" policy reduce the Black arrest rates?

| MDPD Percent Sustained Complaints |         |               |            |             |
|-----------------------------------|---------|---------------|------------|-------------|
|                                   | Arrests | IA Complaints | Still Open | % Sustained |
| 1994                              | 68675   | 225           | 0          | 25%         |
| 1995                              | 65632   | 202           | 6          | 22%         |
| 1996                              | 70954   | 201           | 15         | 29%         |
| 1997                              | 59806   | 233           | 70         | 17%         |

**Chart 2      MDPD Percent of Sustained Complaints**

While few arrests result in complaints to Miami-Dade's Internal Affairs unit, those received are sustained at a relatively high rate of 25% for cases taken in 1994. Chart 2 suggests a positive trend in sustained outcomes for 95-97 cases while pointing out that some cases are still open three years into the investigation.

FIGURE 8 MDPD Unauthorized Use Of Force Complaints

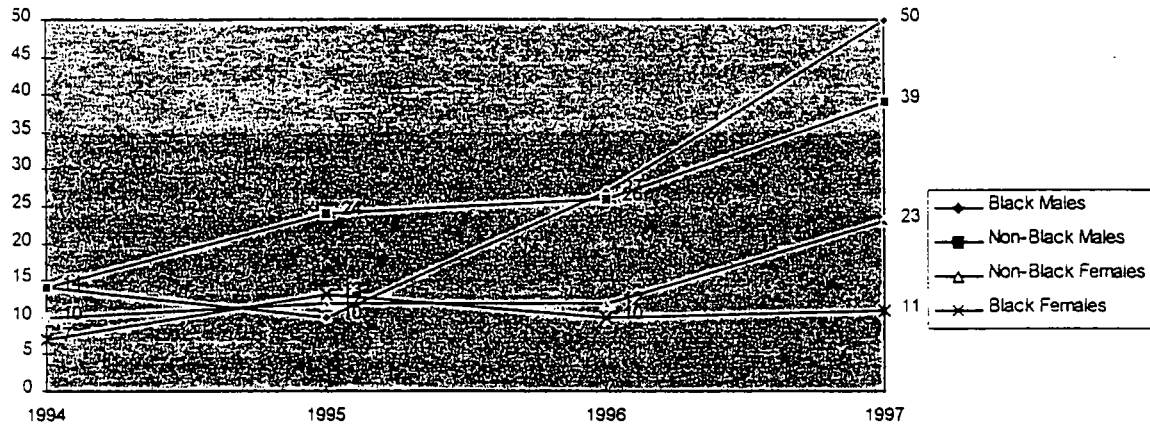
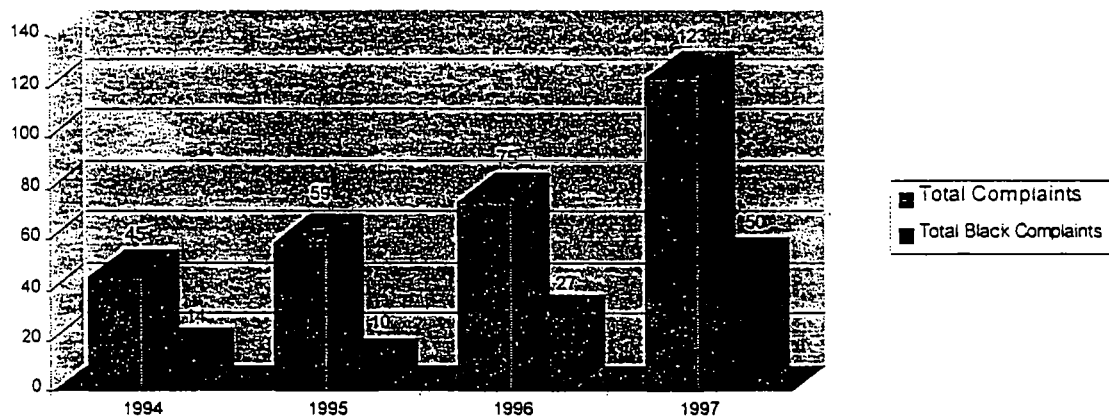


FIGURE 9 Total Complainants and Black Complainants



## Figures 8-10 MDPD Unauthorized Use of Force Complaints

Figure 8 is a line graph that depicts MDPD complainant race and gender count comparisons over four years. The rate of increase for Unauthorized Use of Force complaints by Black Males since 1995 is much higher than for any other reported category.

Figure 9 is a bar graph that depicts the proportion of MDPD Use of Force Complaints from Blacks compared to totals, from 1994-1997. There is a clear increasing trend for this type of complaint in general as well as for Black Males.

FIGURE 10 Unauthorized Use Of Force Complaint Rates 1994-1997

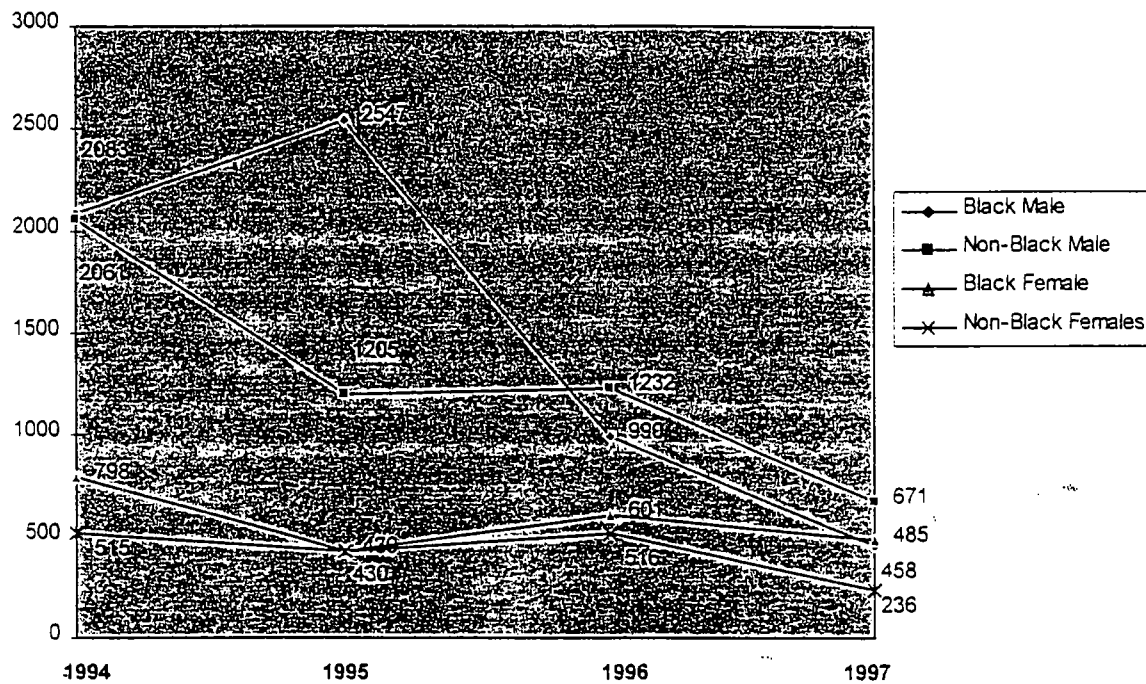


Figure 10 is a line graph that depicts trends in Unauthorized Use Of Force Complaint rates from 1994-1997. The disparity between Males and Females, regarding how many arrests it takes to generate this type of complaint, has narrowed tremendously since 1994. Males in 1997 were much more likely to file this type of complaint than in 1994. Non-Black females are most likely to file this type of complaint and Non-Black males are least likely to file this type of complaint.

FIGURE 11 1994-1997 Percent of Complaints That Involve Use Of Force

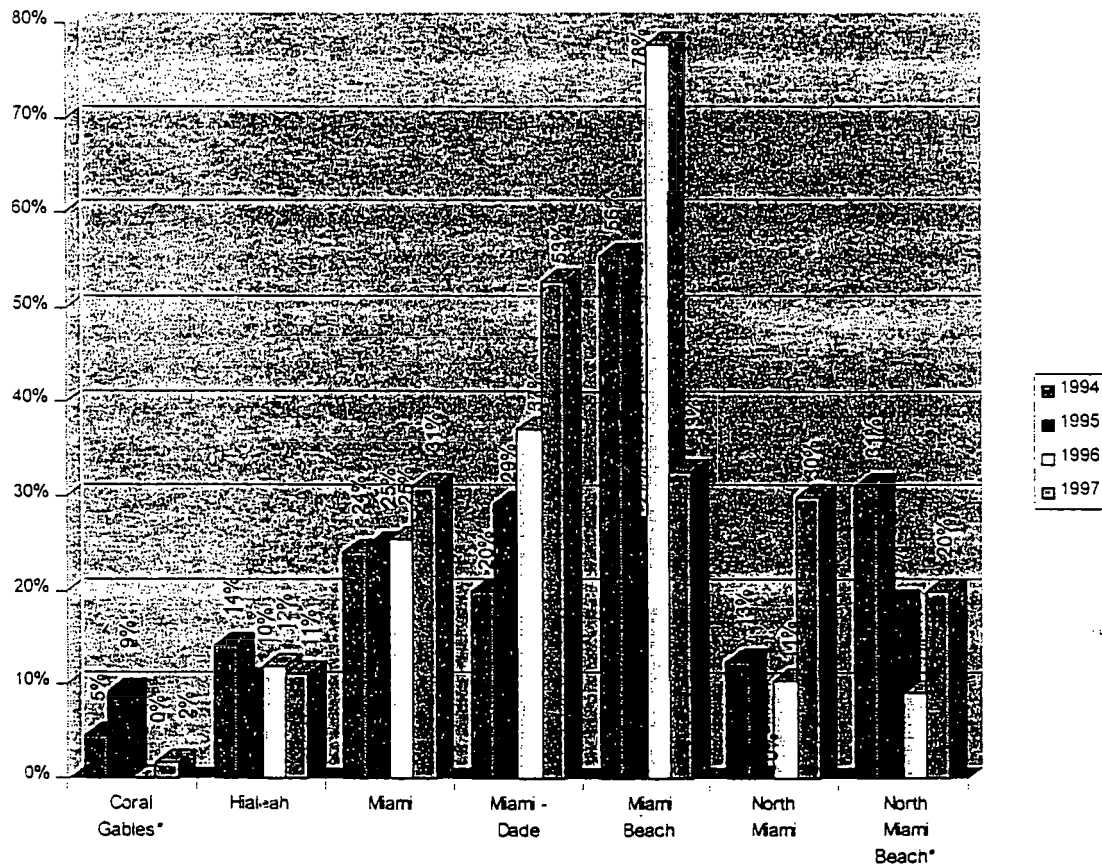


Figure 11 must be interpreted with extreme caution given that the large and mid-sized municipality comparisons are provided simply to highlight apparent inconsistency in practice between them. The within municipality trends in the proportion of total complaints involving Unauthorized Use of Force are instructive of what is happening in each agency. The trend for MDPD and Miami are clearly distinct in showing step like increases for 1994-1997 when compared to the others.



**Staff Findings** - From Jail and Prison visitations, Police agency responses and analyses of all materials reviewed.

1. It is readily observable that Black males are over represented in arrests, as jail inmates and as convicted felons.
2. It is common for young Black men to report they have been stopped by Police because of their skin color.
3. Some Black Police Officers and a Black Police Chief have publicly acknowledged that young Black males are more likely to be stopped by Police than others.
4. In 1994, 50% of the 68,675 arrests by Miami-Dade Police Department (MDPD) were of Black people compared to 1997 when it was 47% of 59,806 arrests.
5. The 1994 MDPD arrests resulted in a total of 45 use of force complaints while 1997 arrests resulted in 123 use of force complaints, yet there were 8,869 fewer arrests in 1997 than 1994.

6. Police race profiling practices are of national and international concern but no one has yet gathered reliable data to determine the extent of the practice or the underlying intentionality when it does occur.
7. Local police agencies generally provide Officers appropriate ethical guidelines pertaining to race relations as well as clear anti-discrimination policies.
8. Quality control data to monitor race based behaviors and data pertaining to high public safety impact arrests vs. low public safety impact arrests are not currently collected.
9. Outcome evaluations that look at unintended disparate community impact, or post arrest actions of the State's Attorney and Courts, are not routinely done to objectively assess public safety.
10. Some small local police departments do not have computerized information systems or resources to devote to gather information at this time.

**Staff Recommendations:**

1. A consortium of local university faculty with expertise in criminal justice, community relations and outcome evaluations should be convened by MDPD and the Dade County Association of Chiefs of Police to design and implement a data gathering system to monitor arrest quality and zero tolerance of racism.
2. The IRP should contribute to local constructive police/community dialogue by joining the American Psychological Association's National Conversation on Racism, distributing related materials and sponsoring events.
3. Elected officials should be informed and asked to lead and build community.

# City of Miami

WILLIAM E. O'BRIEN  
Chief of Police



DONALD H. WARSHAW  
City Manager

MAY 13 1999

Mr. Eduardo I. Diaz  
Executive Director  
140 West Flagler Street  
Suite 1101  
Miami, FL 33130-1561

Dear Mr. Diaz:

I have taken the opportunity to review the document you sent me, "Police Complaints and Race: An Independent Review Panel Preliminary Staff Report." This issue is an important one for our community and I believe that an open discussion can benefit us all.

The Miami Police Department is dedicated to providing the best possible police service to every member of our community. We have clear policies on the use of force and a thorough review process to insure the policies are being followed.

The best aspect of this report is the fact that it could provide the community with important information on the actions of the police. I am confident that the City of Miami Police Department can demonstrate that we are a professional organization motivated to work with the communities we serve and not by any particular bias.

In the review of these issues, it is important that a standard be used to compare different departments. Without such a standard, any comparisons will be very misleading. An example of this is in the manner we document complaints. At the City of Miami we document all of our complaints as "Internal Affairs Complaints." At the Miami-Dade Police Department, they classify their complaints as "Personnel Complaints" or "Internal Affairs Complaints."

Further study is necessary to make this a useful report. Below are some suggested areas to pursue:

- What type of incident lead to the complaint?
- Was there a crime involving a victim?
- What information was used to decide enforcement actions?
- Was the community involved in the development of these plans?
- Is one offender population over represented in the number of complaints they make?

As I stated earlier, the results of this report will be important to the community. Care should be exercised to insure that it is a fair representation of the current situation. The City of Miami Police Department is ready to assist your panel in any way possible towards this goal.

RECEIVED  
MAY 21 1999

Sincerely,

  
William E. O'Brien  
Chief of Police

WEO:rj

INDEPENDENT REVIEW  
PANEL



MIAMI POLICE DEPARTMENT/P.O. BOX 016777 / Miami, Florida 33101 / (305) 579-6565





# Metro-Dade Police Department

Director's Office  
9105 N.W. 25th Street  
Miami, Florida 33172



An Internationally  
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Police Service

May 24, 1999

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MAY 25 1999

INDEPENDENT REVIEW  
PANEL

Eduardo I. Diaz, Ph.D.  
Executive Director  
Independent Review Panel  
140 West Flagler Street, Suite 1101  
Miami, Florida 33130-1561

Dear Dr. Diaz:

Thank you for the opportunity to review and provide comments regarding the preliminary report entitled Police Complaints and Race prepared by the Independent Review Panel. We appreciate your mention that Miami-Dade Police Department's (MDPD) response was the most comprehensive attempt to address the issue of police misconduct. MDPD recognizes the importance of addressing citizen concerns about police behavior and we hope the following comments will assist you in evaluating the information contained in the Report.

As the Report mentions, there is an inherent difficulty in comparing the various local law enforcement agencies in Miami-Dade County due to the varying departmental reporting criteria for disposition of citizen complaints, recruitment and selection process for police officers, police training requirements and established departmental policies. Therefore, the information provided here will focus on information relating specifically to MDPD. The Report reveals that MDPD along with the City of Miami Police Department represents the majority of arrest statistics. Several reasons are mentioned for the significant amount of MDPD arrests when compared to other local police departments. It is important to note our large service population of over 1,196,000 is a significant contributing factor for MDPD arrest figures.

In order to facilitate your analysis, we have updated the Comparison of Unauthorized Use of Force Complaints and Arrests by Race/Sex to include year-end 1998 data. The comparison indicates minor fluctuations in complainants in each of the reported categories. We, however, feel it is important to highlight the significantly low percent of total complainants to total MDPD arrests for each of the five years. This is also noted in the high number of arrests needed to generate one complaint, as indicated in the Report, Figures 2-5. The Report also indicates MDPD has a relatively high rate of sustained internal affairs complaints. This is attributable to the diligence and seriousness in which such complaints are addressed and investigated by our Department. MDPD remains

Eduardo I. Diaz, Ph.D.

May 24, 1999

Page 2

committed, as expressed in our Mission Statement, "to promoting a safe and secure environment, free from crime and fear of crime, maintain order and practice our core values of integrity, respect, service and fairness" for all individuals. To this end, the Department established a Zero-Tolerance of Racism and detailed Use of Force policies, as well as the Early Identification System to identify potential problems in employee conduct and various training programs to improve police-citizen interactions.

The Department has made several efforts to improve police-community relations by establishing several community policing initiatives such as the Community Oriented Policing Services (COPS) programs, bicycle patrol and neighborhood resource officer units at each district. These efforts have been successful in fostering positive citizen-police interactions, remaining responsive to community needs, and increasing community involvement in policing activities. MDPD supports the establishment of a criminal justice consortium to develop a data gathering system to address concerns raised by the Independent Review Panel. To maximize the participation of local police departments, the consortium should be coordinated by the Dade County Association of Chiefs of Police to ensure a comprehensive approach to resolving these issues.

Please be assured that Miami-Dade Police Department will continue to address community concerns expeditiously and improve community confidence in law enforcement through the daily conduct of all departmental personnel. Should you need further information or if we can be of further assistance, please feel free to contact my office at (305) 471-2100.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carlos Alvarez', followed by a checkmark.

Carlos Alvarez  
Director

Enclosure

# MIAMI-DADE POLICE DEPARTMENT

## Comparison of Unauthorized Use of Force

### Complainants and Arrests by Race/Sex

|                                                       | 1994          | 1995          | 1996          | 1997          | 1998          |
|-------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|
| <b>Black Males</b>                                    | 14            | 10            | 27            | 50            | 35            |
| <b>Number of Arrests</b>                              | 28,847        | 25,466        | 26,721        | 22,894        | 23,230        |
| <b>Percent of Complainant to Arrests</b>              | 0.05%         | 0.04%         | 0.10%         | 0.22%         | 0.15%         |
| <b>Black Females</b>                                  | 7             | 13            | 10            | 11            | 8             |
| <b>Number of Arrests</b>                              | 5,523         | 5,586         | 6,010         | 5,336         | 5,291         |
| <b>Percent of Complainant to Arrests</b>              | 0.13%         | 0.23%         | 0.17%         | 0.21%         | 0.15%         |
| <b>Non-Black Males</b>                                | 14            | 24            | 26            | 39            | 35            |
| <b>Number of Arrests</b>                              | 29,158        | 28,928        | 32,030        | 26,157        | 25,481        |
| <b>Percent of Complainant to Arrests</b>              | 0.05%         | 0.08%         | 0.08%         | 0.15%         | 0.14%         |
| <b>Non-Black Females</b>                              | 10            | 12            | 12            | 23            | 15            |
| <b>Number of Arrests</b>                              | 5,147         | 5,652         | 6,193         | 5,419         | 5,537         |
| <b>Percent of Complainant to Arrests</b>              | 0.19%         | 0.21%         | 0.19%         | 0.42%         | 0.27%         |
| <b>Complainant Total</b>                              | <b>45</b>     | <b>59</b>     | <b>75</b>     | <b>123</b>    | <b>93</b>     |
| <b>Arrest Total</b>                                   | <b>68,675</b> | <b>65,632</b> | <b>70,954</b> | <b>59,806</b> | <b>59,539</b> |
| <b>Percent of Total Complainants to Total Arrests</b> | <b>0.07%</b>  | <b>0.09%</b>  | <b>0.11%</b>  | <b>0.21%</b>  | <b>0.16%</b>  |

Note: The number of complainants may exceed the number of complaints because, one formal complaint may include more than one complainant.

Note: Statistics include adults and juveniles.



1. Young Black males are more likely to be targets of police attention and subject to arrest than others.
2. Young Black males' complaints of police brutality are inordinate compared to those of non-Black complainants.
3. The complaints of young Black males are not expeditiously pursued compared to those of others.

Eduardo I. Diaz, Ph.D.

June 20, 1999

Page Two

The first allegation, regarding "selective arrests," is substantiated by the information provided in Figures 6 & 7, appearing on page eight of the report. **Based on those figures, 46%-50% of all arrests made by the Metro-Dade Police Department ("MDPD") are of African Americans -- a disproportionate and statistically significant amount.** The disproportionate arrests of African Americans would be more clearly demonstrated if information, also in chart format, of arrest percentages for other races and ethnicities were provided for comparison.

The second allegation concerning "use of force" complaints is also substantiated by information provided in the panel's report. **Figure 9, appearing on page ten of the report, indicates that 41% of the total number of "use of force" complaints filed against the MDPD in 1997 were made by African Americans.** Again, the fact that a disproportionate number of African Americans filed "use of force" complaints would be more clearly demonstrated if information, also in chart format, concerning the number of "use of force" complaints made by other racial and ethnic groups were provided for comparison.

More alarming is that the number of "use of force" complaints made by African Americans against the MDPD has increased from 31% in 1994 to 41% in 1997. **This indicates a 32% increase in "use of force" complaints made by African Americans against the MDPD over the last four years, a trend that clearly substantiates the second allegation.**

We note the absence of any information regarding the third allegation, that the complaints of African American males are not expeditiously pursued. To evaluate this allegation we recommend that the report describe the MDPD's entire complaint process -- including whether it is a "complainant friendly" process, the average time to resolve a complaint, the appeal process, and the action(s) taken when a complaint is sustained.

As noted in staff finding #6, appearing on page fourteen of the report, "no one has yet gathered reliable data to determine the extent of the practice [of racial profiling] . . . when it does occur." The collection of detailed information with regard to race, ethnicity, gender, and age would form a database from which allegations of racial profiling could be evaluated. This database could also be employed in an "early warning system" that identifies potential problem officers. As noted on page five of the report, "[l]ess than half of the agencies reported that they have an Early Warning System to track potential problem officers."

On June 9, 1999, President Clinton issued an Executive Order on racial profiling in which he ordered federal law enforcement officials to collect data on the race and gender of the people they stop to question or arrest. We strongly urge the panel to follow President

Eduardo I. Diaz, Ph.D.  
June 20, 1999  
Page Three

Clinton's example and recommend that the Miami-Dade County Commission require police in Miami-Dade County to record the race, ethnicity, gender, and age of all people they stop to question or arrest.

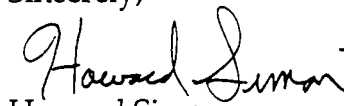
Additionally, we strongly urge the panel to seek the input of African American males by interviewing several whose complaints have been sustained by the MDPD. Chart 2 on page nine of the report indicates that the MDPD has sustained an average of 23% of the complaints made against it in the four year period from 1994 to 1997; the report characterizes this as a "relatively high rate." We note that this "relatively high rate" illuminates a disturbing statistic: **the MDPD police department determined that for the four year period from 1994 to 1997, approximately 25% of citizen complaints about Miami-Dade police officers were corroborated by its own internal investigation.**

We note not only the absence of "anti-discrimination" and "use of force" policies for some police departments in Miami - Dade County listed in the table on page four, but also the absence of a description and/or explanation of the purpose of these policies. We encourage the panel to recommend that all police departments in Miami-Dade County have "anti-discrimination" and "use of force" policies. Moreover, we encourage the panel to provide models of such policies in its report.

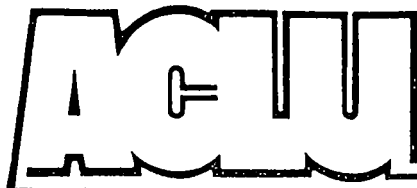
Lastly, we believe that the report would be more informative if each table and chart specifically stated whether its information pertained to all African Americans, African American males, the total population, etc.

Thank you for the opportunity to contribute to a constructive dialogue regarding citizen complaints about police activity and racial profiling by law enforcement agencies in Miami-Dade County. We look forward to participating in the public earing of the panel's interim report.

Sincerely,

  
Howard Simon  
Executive Director

cc: Representative Carrie Meek  
Senator Kendrick Meek  
Commissioner Dr. Barbara Carey-Schuler



AMERICAN CIVIL LIBERTIES UNION OF FLORIDA

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July 7, 1999

VIA FACSIMILE TRANSMISSION  
AND FIRST CLASS MAIL

Eduardo I. Diaz, Ph.D.  
Executive Director  
Independent Review Panel  
140 West Flagler Street, Suite 1101  
Miami, FL. 33130-1561

RECEIVED  
JUL 09 1999  
INDEPENDENT REVIEW  
PANEL

Dear Dr. Diaz:

This is a supplement to our letter of June 20, 1999, in which we provided our response to the Independent Review Panel's ("IRP") preliminary report. As we rushed our response to you, we would like to take this opportunity to supplement those comments.

We want to reiterate that the disproportionate number of arrests of African Americans (46%-50% of all arrests) made by the Metro-Dade Police Department ("MDPD") substantiates the charge of racial profiling in Miami-Dade County made by Rep. Carrie Meek in her June 1998 letter to County Commissioner Dr. Barbara Carey-Schuler. However, the problem would be more clearly demonstrated if comparative data for non-African Americans were also provided.

As noted in our letter of June 20, 1999, staff finding #6 of the IRP report states that "no one has yet gathered reliable data to determine the extent of the practice [of racial profiling in Miami-Dade County] . . ." The collection of racial data is voluntarily performed by the police departments in San Diego and San Jose, and racial data is also collected by the Pittsburgh police and the Maryland state police, as the result of lawsuits. In addition, due to a recent Executive Order on racial profiling issued by President Clinton, federal law enforcement officials record the race and gender of all people they stop to question or arrest.

Eduardo I. Diaz, Ph.D.

July 7, 1999

Page Two

Accordingly, as increasing numbers of law enforcement agencies are now collecting data on the race and ethnicity of those stopped in police initiated contacts with citizens, we urge the panel to add the following "Staff Recommendation": that the MDPD and the police departments in other Miami-Dade County municipalities voluntarily record the race, ethnicity, gender, and age of people they stop to question or arrest.

We would like to emphasize that, currently, police departments in Miami-Dade County are unable to defend themselves against charges of racial profiling because such racial data is not available. The collection of information concerning race, ethnicity, gender, and age from all police initiated contacts with citizens would benefit police departments by providing them with concrete data regarding allegations of racial profiling.

With regard to Figures 2, 3, 4, and 5 of the report, we believe that the charts would be both more informative and more instructive if reconfigured to show the actual complaint percentage (#complaints/ #arrests). We note the absence of the following relevant data: (1) the percentage of complaints resulting from stops (vs. arrests) and (2) the percentage of arrests resulting from stops. Such information would provide a more accurate analysis of which groups are the principle subjects of stops, arrests, and complaints by the MDPD.

Also with regard to Figures 2, 3, 4, and 5 of the report, the issue of a disproportionately high complaint percentage (#complaints/ #arrests) should be investigated and addressed. A disproportionately high rate of complaint could be the result of the positioning of resources. For example, Figure 2 indicates that the Coral Gables Police Department had a disproportionately high complaint percentage, 7%, in 1994. This high rate of complaint could have been due to the targeting of the University of Miami student population or it could have been due to a concentration of police officers on US #1. More information is needed to explain the disproportionately high complaint rate.

Regarding the high rate of sustained complaints (23%) made by the MDPD's own internal investigation, we note that the national average for the rate of sustained complaints is 10%-13%. (Information as to the 10%-13% national average for the rate of sustained complaints is provided by Dr. Samuel Walker, Professor of Criminal Justice at the University of Nebraska at Omaha, and author of the forthcoming book *Citizen Complaints and Police Accountability*.) Consequently, we note that for the four year

Eduardo I. Diaz, Ph.D.

July 7, 1999

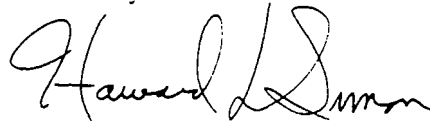
Page Three

period from 1994-1997, the MDPD corroborated citizen complaints at twice the national average.

We also note, for comparison, that the national average for the rate of sustained "use of force" complaints of county police departments is only 8.1%, one third of the MDPD's sustain rate of total complaints. (Information as to the 8.1% national average for the rate of sustained "use of force" complaints was provided in *Police Use of Force: Official Reports, Citizen Complaints, and Legal Consequences*, published by the Police Foundation. The Police Foundation is a public nonprofit research and technical assistance group established by the Ford Foundation and dedicated to improving policing in America. The research findings in the *Police Use of Force* report were supported by a grant from the National Institute of Justice, Office of Justice Programs, US Department of Justice.)

Thank you for the opportunity to contribute to a constructive dialogue regarding racial profiling in Miami-Dade County. We look forward to attending the July 22, 1999, public hearing of the panel's interim report.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard Simon". The signature is fluid and cursive, with the first name "Howard" written in a larger, more prominent script than the last name "Simon".

Howard Simon

Executive Director

cc: Representative Carrie Meek  
Senator Kendrick Meek  
Commissioner Dr. Barbara Carey-Schuler

**nccj**The National Conference  
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Sidney Levin  
Bennett M. Lifter  
Laurans A. Mendelson  
Carlos A. Migoya  
Susan Potter Norton  
Robert Paul  
Ray H. Pearson  
Arron S. Podhurst  
Lawrence P. Puckett, Jr.  
Herman J. Russomanno  
Rowland Schaefer  
Eric R. Sisser  
Chesterfield Smith  
Sol M. Taplin  
Robert H. Traurig  
Gonzalo F. Valdes-Fauli  
Sherwood M. Weiser  
Jay W. Weiss  
Stanley F. Whitman  
Leonard Wien  
Malcolm Wiseheart, Jr.  
Burton Young*Executive Director*  
Jim Howe

July 9, 1999

Eduardo I. Diaz, Ph.D., Executive Director  
Independent Review Panel  
140 West Flagler Street, Suite 1101  
Miami, Florida 33130

Dear Dr. Diaz:

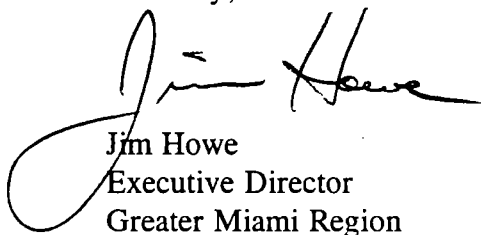
Thank you for sharing the Independent Review Panel's study on *"Police Complaints and Race"*. I thought the report was very well written, clear and concise. It was especially helpful to have the staff analysis of the variations in levels of complaints and to learn that interdepartmental differences in reporting criteria can be part of some of the significant differences in the frequency of complaints.

I hope that we can work with police departments to help reduce community relations problems which may arise from complaints and/or enforcement procedures. Please let me know of any role you see for our agency to help the Independent Review Panel in its important work.

As you know, our past success in managing a joint police and citizen NCCJ law enforcement task force was, in large part, a result of the close cooperation between the IRP and the NCCJ. Perhaps there will be an opportunity to be of service in this area again in the near future.

Again, I commend the Independent Review Panel for its report and for the professionalism of its staff.

Sincerely,

  
Jim Howe  
Executive Director  
Greater Miami Region**RECEIVED**  
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INDEPENDENT REVIEW  
PANEL

JH/lg

**We Open Minds**

The National Conference for Community and Justice, founded in 1927 as The National Conference of Christians and Jews, is a human relations organization dedicated to fighting bias, bigotry and racism in America. NCCJ promotes understanding and respect among all races, religions and cultures through advocacy, conflict resolution and education.