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Re: Comments on CPD's Draft "Gender-Based Violence Incidents" Policy

Dear Counsel and Monitor Hickey,

We write on behalf of the Communities United parties of the consent decree Coalition ("CU Parties") to provide detailed suggestions regarding the Chicago Police Department's ("CPD") draft policy on Gender-Based Violence Incidents (G04-XXXX) (the "policy"). The Coalition sent an initial set of comments to CPD on May 5, 2025, which we emailed to all counsel and the IMT on May 7, 2025. This letter expands upon those comments and provides additional explanation and context.

To develop these recommendations, counsel for the CU Parties met with approximately a dozen organizations that operate in the Chicago area and statewide, all of whom work with or represent victims and survivors of gender-based violence. Some of these organizations are themselves networks of local service providers. Thus, the CU Parties received input from a very broad set of stakeholders who work with directly impacted individuals. We understand that some of these groups also have provided comments on the policy directly to CPD, and/or requested to meet with CPD, at our urging. Unfortunately, we learned during our discussions that most of these organizations were not consulted as CPD developed the policy, nor had they reviewed the policy prior to CPD posting it on its website in April 2025. While we have done our best to incorporate their input into our suggestions below, we also strongly suggest that CPD undertake additional, sustained engagement with impacted communities and advocates regarding the policy before publishing a second draft for further public comments.

The CU Parties appreciate CPD's incorporation of trauma-informed communication and interviewing strategies into the policy as a very welcome development. We believe that, if CPD officers are trained and held accountable to the standards expressed, it will result in a significant

reduction in harm and trauma to survivors and victims, and to an increase in trust between the community and the police. There are, however, multiple areas where the policy needs improvement.

Below, we make several suggestions that fall into four categories:

- I. CPD should integrate this policy with its existing policies regarding domestic violence, sexual assault incidents, and stalking, including considering whether all of these policies should be combined into a single policy or suite.
- II. The policy should address several additional topics, including the types and enforcement of protective orders and the implementation of Illinois' new domestic violence firearms search warrant process;
- III. The policy should add, refine, or revise language throughout, including the definition of gender-based violence, the ways in which officers should and should not communicate with victims/survivors, the role of CPD's Office of Victim Services, and the role of the Cook County State's Attorney's Office's felony review process; and
- IV. The policy should include data collection and reporting mechanisms.

These points are further explained in the sections that follow.

I. The policy should be revised in conjunction with CPD's existing policies and notices regarding domestic violence, sexual assault, and stalking incidents.

The proposed policy, Sections III.E.1 and IV.F, incorporates multiple other CPD policies: Domestic Incidents; Domestic Incident Notice; Orders of Protection; No Contact Order; Sexual Assault Incident Procedures Act; Sexual Assault Incident Notice; and Anti-Stalking Statute, among others. The proposed policy states that it is the "foundation for the principles of the Department's response to incidents of gender-based violence" and that other policies "establish the specific Department responsibilities associated with response and investigations that have a gender-based violence component" (*see* G04-XXXX, Section IV.F.).

We are unclear why CPD needs so many different but overlapping policies that cover CPD's response to various types of gender-based violence. Worse, we are concerned that the existence of multitudinous different policies is likely to cause confusion on the part of CPD members. If officers are uncertain about which policy or policies to reference in a given situation, they may not fully comply with all of the applicable rules, and it will be more difficult for department leadership to hold them accountable.

We strongly suggest that CPD consider merging these policies into a single policy (or policy suite) regarding all gender-based violence incidents.

In so doing, we recommend that CPD update the contents of the earlier policies that are incorporated by reference in the proposed policy. For instance, CPD's Domestic Incidents Policy (G04-04-02 and S04-29), as well as its Domestic Incidents Notice Policy (G04-04-02), were last updated in 2012. As a result, the Domestic Incidents Policy includes outdated language regarding bail bond and conditions of release that have become obsolete since the passing of the SAFE-T

Act. The 2012 Domestic Incidents Policy also lacks trauma-informed interviewing requirements. While the Domestic Incident Notice itself was updated in 2023, it is also out of date (for example, the form references bail bond provisions despite the fact that bail bond has been abolished in Illinois).

CPD's Anti-Stalking Statute policy was last updated in 2004, and a new version should incorporate laws passed since then, such as the Stalking No Contact Order Act (740 ILCS 21/1).

II. The policy is missing key requirements necessary for officers and detectives to understand their responsibilities to investigate gender-based violence and enforce protective orders.

a. The policy should incorporate CPD's sexual misconduct policy (G08-06) and address the unique vulnerability of survivors to abuse by CPD officers.

As noted in the IACP's Executive Guidance on Addressing Sexual Misconduct by Law Enforcement Agents, "predators select victims based on vulnerabilities and a perceived lack of credibility, and therefore, victimization is often higher among certain populations including: (1) minors; (2) individuals in prostitution and/or the commercial sex industry; (3) individuals under the influence of drugs or alcohol; (4) immigrants and undocumented persons; (5) individuals with limited English proficiency; (6) people with mental illness or developmental challenges; (7) individuals with physical disabilities; and (8) those who have been victimized previously."¹

Accordingly, this policy should note that victims/survivors of gender-based violence are uniquely vulnerable to sexual abuse by law enforcement and should emphasize CPD's Prohibitions of Sexual Misconduct policy (G08-06) which defines, identifies, and prohibits sexual misconduct by all Chicago Police Department members.

This policy also should explicitly prohibit sexual commentary, harassment, ongoing social contact, dating, touching, unnecessary contact, call backs, questions or commentary on a person's anatomy, sexual practices, or relationships, promises of protection or other forms of sexual harassment, extortion, or violence involving survivors of domestic violence or sexual assault.

b. The policy should be revised to require officers to accept all reports of gender-based violence.

Counsel for the CU Parties heard numerous complaints that CPD officers and detectives have discouraged survivors and victims from making reports and/or told survivors and victims that their situations do not merit further investigation. The policy must clearly explain that department members are obligated to take all initial reports, without prejudging whether the case merits prosecution and without otherwise discouraging survivors and victims from coming forward.

Similarly, counsel for the CU Parties heard many complaints that CPD officers' written reports included biased or derogatory personal opinions regarding survivors and victims. These

¹ International Association of Chiefs of Police, <https://www.theiacp.org/sites/default/files/all/a/AddressingSexualOffensesandMisconductbyLawEnforcementExecutiveGuide.pdf> (last visited May 14, 2025).

unnecessary statements have the effect of undermining prosecution. The policy should expressly instruct officers to record only facts and summaries of witnesses' statements in their interview reports. Department members should not include speculation or personal judgments about the witnesses' behavior, characters, relationships, or motivations within their reports. For example, the policy should instruct officers that a victim/survivor's criminal history, current probation or parole status, or outstanding warrants are not, by themselves, reasons to refuse or accept a report or to refuse to credit the victim/survivor's report.

The policy should further expressly forbid department members from failing to respond to a call for service or complaint on the basis of the gender identity, gender expression, and/or sexual orientation of the caller or complainant. Relatedly, the policy should state that department members shall not fail to respond to an individual, fail to investigate crimes, or fail to take requests or complaints seriously based on someone's actual or perceived sexual orientation, gender identity or expression, including calls to report cases of domestic, sexual, homophobic, or transphobic violence. And the policy must make it clear to department members that when responding to calls for service related to gender-based violence offenses, they are prohibited from making assumptions about which individual(s) may be victims and/or suspects based on their race, ethnicity, national origin, religion, gender identity, gender expression, and/or sexual orientation, disability, immigration status, housing status, or other protected characteristics.

Additionally, survivors and victims have encountered CPD members who refuse to take reports because they believe that the State's Attorney's Felony Review Unit will not prosecute the matter, without even consulting with an Assistant State's Attorney. This policy, along with CPD's policy titled "Felony Review by Cook County State's Attorney" (S06-03), should explain how officers and supervisors can best work with the State's Attorney, including any required notifications, procedures, and responsibilities and ways to best present a case of gender-based violence so that the State's Attorney's Office can accept it.

c. The policy should be revised to include a section on CPD's implementation of Karina's Law (P.A. 103-1065) to best serve survivors and victims.

Karina's Law, P.A. 103-1065, went into effect on May 11, 2025, and amended 725 ILCS 5/112A-14. This law permits a court to order the surrender or removal via search warrant of firearms and firearms parts from any respondent in an order of protection, as well as to order the surrender or removal of a FOID card or CCL license if the respondent has one.

This policy on gender-based violence should explain how CPD will implement Karina's Law, including how department members will enforce firearms restraining orders and notify survivors/victims of their rights under this law.

d. The policy should be revised to include information on the various types of protective orders and their enforcement.

Related to the point above, counsel for the CU Parties heard concerns that CPD members are not well versed regarding the various types of protective orders and their enforcement.

Advocates cited times in which department members refused to enforce protective orders issued in connection with a criminal case because they do not contain expiration dates. Further, department members have wrongly threatened to arrest the beneficiaries of domestic violence orders of protection for "allowing" their abusers to return – despite the fact that these orders cannot

be enforced against the beneficiary and CPD's policy strongly discourages mutual arrest in domestic violence situations.

Accordingly, the policy should include a detailed explanation of the various types of protective orders: domestic violence orders of protection, sexual assault civil no contact orders, stalking no contact orders, and firearms restraining orders (Karina's Law).

Within this new suggested section on protective orders, CPD should incorporate updated guidance on the information that is currently contained in CPD's policies titled Orders of Protection (G04-04-01) and No Contact Order (S04-04-02) (which, as we recommend above, should be updated and consolidated into this policy).

The policy, and associated training, also should explain to officers their responsibilities to enforce these protective orders and the importance of doing so promptly and accurately for the safety of the victim and their family/household members.

III. The policy language and definitions must be refined throughout Sections II-IV.

a. The policy fails to inclusively define "gender-based violence" (Section II.A).

In Section II.A, the policy provides a definition of "gender-based violence" that is too narrow. The policy's current definition is:

- 1) one or more act of violence or physical aggression satisfying the elements of battery under the law of Illinois, at least in part, based on sex, whether or not those acts have resulted in criminal charges, prosecution, or conviction;
- 2) a physical intrusion or physical invasion of a sexual nature under coercive conditions satisfying the conditions of battery under the laws of Illinois, whether the act or acts resulted in criminal charges, prosecution, or conviction;
- 3) a threat of an act described in item 1) or 2) causing a realistic apprehension that the originator of the threat will commit the act.

Although the policy states that the definition is based on the Illinois Gender Violence Act, 740 ILCS 82/, it misses one very important element of the definition of GBV in that statute: "domestic violence, as defined by the Victims' Economic Security and Safety Act (VESSA)." The VESSA defines domestic violence as "abuse...by a family or household member." See 820 ILCS 180/10(6). The omission of this section of the Illinois Gender Violence Act not only creates confusion but also wrongfully deprioritizes domestic violence as a type of gender-based violence.

The policy's definition of gender-based violence further falls short by failing to prominently include non-physical forms of gender-based violence outside of the Note in Section II. While the Note mentions that gender-based violence "can include but is not limited to physical, sexual, psychological, economic, or technological abuse of harm (e.g., cyberstalking, sextortion, image-based abuse)," relegating non-physical abuse or harm to a Note sends the wrong message that non-physical forms of abuse is a lesser form of harm than physical abuse.

Accordingly, the definition of gender-based violence in Section II should be broadened and clarified to include all forms of gender-based harm. The language should draw upon several areas such as the Illinois Domestic Violence Act, the Criminal Code, VESSA, and the City of Chicago

Mayor's Office response to Gender-Based Violence. The latter defines gender-based violence as harm that:

...disproportionately impacts women of color, indigenous women, transgender individuals, and LGBTQIA+ individuals, immigrants, and people with disabilities. It is a human rights violation and a public health crisis. GBV is a form of discrimination and recognized as a manifestation of unequal power. GBV is bias-based harm caused by one's bias against another person's gender identity. Harmful acts include physical violence; sexual exploitation; emotional abuse; sexual violence; sexual harassment; discrimination based on gender; sexual exploitation; human trafficking; workplace violence; economic/financial abuse; coercive manipulation; harms related to immigration; stalking and harassment, including via electronic communications; reproductive coercion; discrimination and/or targeted violence based on sexual orientation and/or gender identity; and institutional violence.²

If CPD prefers a definition more closely tied to existing criminal laws, we are also aligned with the proposal provided by The Network: Advocating Against Domestic Violence:

"Gender-based violence" is sex and gender-based discrimination that includes domestic violence and abuse as defined in the Illinois Domestic Violence Act, criminal sexual assault and criminal sexual abuse as defined in the Criminal Code of 2012, stalking as defined in the Criminal Code of 2012, and human trafficking as defined in the Criminal Code of 2012.

b. The policy's definition of "gender bias" should be modified (Section II.B).

Section II.B, defining "gender bias" should delete the terms "objective" and "factual" because stereotypes are never entirely objective or factual – they are generalizations. Police should avoid any assumptions about how all people of certain genders behave, full stop. The American Psychological Association defines gender bias as "any one of a variety of stereotypical beliefs or biases about individuals on the basis of their gender."³ In revising the "gender bias" definition, CPD should consult with local organizations that work on gender-based violence issues.

c. The definition of dating/engagement relationship should be revised per IDVA (Section II.H.7).

Section II.H.7 should delete "same sex or opposite sex" from the definition of "persons...who have or have had a dating or engagement relationship." The phrase "same sex or opposite sex" is not found in the Illinois Domestic Violence Act's definition of persons who have or had a dating or engagement relationship. *See* 750 ILCS 60/103(6). Further, this problematic phrase incorrectly implies the existence of only two sexes, which wrongly excludes transgender, intersex, and non-binary individuals and those in relationships with them.

² City of Chicago Mayor's Office, <https://www.chicago.gov/city/en/sites/community-safety/home/GenderBasedViolence.html> (last visited, May, 13, 2025).

³ American Psychological Association Dictionary, <https://dictionary.apa.org/gender-bias> (last visited May 13, 2025).

d. The policy's definitions of criminal sexual assault and criminal sexual abuse must conform to the Illinois Criminal Code (Section II.I).

The definition of “criminal sexual assault” in Section II.I should include the elements of “aggravated criminal sexual assault” in 720 ILCS 5/11-1.30. Likewise, the definition of “criminal sexual abuse” in Section II.J. should include the elements of “aggravated criminal sexual abuse” in 720 ILCS 5/11-1.60.

These offenses include several aggravating elements important to a fully inclusive definition of gender-based violence. For instance, one example of both aggravated criminal sexual assault and aggravated criminal sexual abuse is the delivery of any controlled substance to the victim without the victim's consent or by threat or deception. To ensure that the policy captures the full range of gender-based violence under the Criminal Code, both aggravated criminal sexual assault and aggravated criminal sexual abuse should be added to these definitions.

e. The policy should include a correct statutory reference to the Stalking No Contact Order Act (Section II.K).

CPD's definition of stalking in Section II.K is substantively accurate. However, it contains an incomplete statutory reference, which should be modified to incorporate the Stalking No Contact Order Statute as follows: “Stalking: (720 ILCS 5/12-7.3) and (740 ILCS 21/5) A person commits stalking...”

f. The policy should include a definition of “intimate partner violence” (Section II, new).

“Intimate partner violence” should be added to the list of definitions in Section II. Community organizations serving the LGBTQ+ population suggested to counsel for the CU Parties that the term “intimate partner violence” is likely to be more familiar to victims/survivors of abuse in LGBTQ+ relationships.

While the terms “intimate partner violence” and “domestic violence” are often used interchangeably, they are not synonymous. According to the Illinois Criminal Justice Information Authority, intimate partner violence is “the more encompassing term, acknowledging current and former relationships between individuals, regardless of gender, marital status, or sexual orientation, and straying from gender assignment of those perpetuating or experiencing violence.”⁴ The added definition should be drafted in consultation with community-based organizations that work with survivors and victims of intimate partner violence in the LGBTQ+ community.

g. The policy should be modified to ensure that it references an updated version of the Illinois Human Rights Act (Section III.B).

Section III.B should be updated to include “reproductive health decisions” as a category of protected individuals under the most recent version of the Illinois Human Rights Act. *See* 775 ILCS 5/1-102(A) (2021).

⁴ Lily Gleicher and Jacquelyn Gilbreath, *Policies and Programs to Address Individuals Who Perpetuate Intimate Partner Violence*, Illinois Criminal Justice Information Authority 1 (2021) <https://researchhub.icjia-api.cloud/uploads/ipv2%20merged-210512T15283266.pdf>.

h. The policy must more clearly explain how (and how not) to identify the aggressor in a domestic violence situation (Section III.K).

Section III.K of the policy should be revised to update and incorporate that portion of the existing Domestic Incidents policy (G04-04) explaining how officers should identify the predominant aggressor during incidents of gender-based violence. Community advocates expressed that they have seen significant confusion and lack of compliance with CPD's existing policy on identifying the primary aggressor, and this subject requires further policymaking and training. CPD should gather feedback from community organizations that are subject matter experts on this issue.

Additionally, the policy should state expressly that, when responding to calls for service relating to domestic violence, assault, harassment or other concerns, members should not make assumptions about which individual(s) may be victims and/or suspects based on their race, ethnicity, national origin, religion, gender identity, gender expression, sexual orientation, disability, immigration status, housing status, other protected characteristics.

i. The policy should be revised to incorporate CPD's TIGN policy (Section IV.A).

Section IV.A should be revised to include a subsection or Note that cross-references CPD's policy titled "Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals" (G02-01-03) to remind officers that survivors and victims may be transgender, non-conforming, and intersex. In such instances, officers should follow the terms of the TIGN policy to comply with the GBV policy's goal of establishing procedures and responsibilities for gender-based violence responses.

j. The policy should be revised to require that survivors and victims are provided the means to effectively communicate with CPD (Section IV.A.2).

Section IV.A.2 should cross-reference CPD's policy on Interactions with People with Limited English Proficiency (S02-01-05). Counsel for the CU Parties heard numerous complaints from advocates that in their recent interactions with CPD, their efforts to make reports and provide interviews were significantly hampered by language barriers. Specifically, Section IV.A.2 should remind department members of their ability and obligation to utilize the LanguageLine InSight app, and/or a qualified department interpreter, to communicate with survivors and victims with Limited English Proficiency.

Section IV.A.2 also should cross-reference CPD's policy on police Interactions with Persons with Disabilities (S02-01-01). While the section references CPD's obligation to interact with seniors and individuals with disabilities "with dignity," it fails to specify that *reasonable accommodations* must be available for victims with disabilities – for instance, providing the option of making a police report by phone for someone with limited mobility.

k. The policy should be revised to more specifically instruct department members what they should not say to victims and survivors (Section IV.A.5).

While we appreciate that Section IV.A.5 of the policy provides appropriate, trauma-informed questions that department members should use when interacting with victims and survivors, it also should incorporate a similar list of terms and questions that should **not** be asked by department members. For example, department members should not:

- Tell victims/survivors that reporting gender-based violence is a waste of time because they will just get back together with their abuser.
- Tell victims/survivors that they invited or encouraged gender-based violence due to their dress, appearance, behavior, or consumption of alcohol or drugs.
- Threaten victims/survivors with actions that would erode their interest in reporting gender-based violence, e.g. threatening to call DCFS and have a survivor's children taken away unless the survivor cooperates with the police; or discouraging a victim or survivor from reporting their abuser because their abuser may be undocumented and could be deported.

These instructions are not merely hypothetical. The community-based organizations with whom we consulted regarding CPD's proposed policy specifically mentioned all of the above statements as examples of negative communication that they and/or their clients have personally experienced when interacting with CPD members recently. For this reason, it is crucial to explain to officers that these specific types of statements are counterproductive and disallowed.

l. The policy should be modified to direct detectives to respond to all forms of gender-based violence (Section IV.B).

Section IV.B concerns the responsibilities of all responding detectives for all gender-based violence incidents, but places great emphasis on sexual assault investigations (as evidenced by the IV.B. note). While this section is important, it does not adequately direct detectives concerning investigating other forms of gender-based violence, such as domestic violence, psychological abuse, or cyberstalking. This section should be modified to ensure that it is applicable to all types of gender-based violence.

m. The policy must do more to ensure timely communication with survivors and victims (Section IV, new).

The policy should create new subsections within the policy that will facilitate better communications between CPD and survivors and victims of gender-based violence. The policy should set out specific rules for the number of days within which officers and detectives will return calls from survivors and victims and their advocates. Additionally, CPD should set specific rules enabling detectives to accommodate scheduling requests from survivors and victims so that survivors and victims may attend interviews in accordance with the demands of work, school or childcare. Finally, CPD should instruct officers/detectives that they should communicate with a victim/survivor's chosen representative, including an attorney, DV or SA advocate, family member, or guardian.

n. The policy should be revised to ensure that the reporting process is safer for survivors and victims (Section IV.B).

We heard numerous complaints from advocates who assist victims/survivors about lack of privacy when attempting to make reports about gender-based violence at various police districts. For instance, several advocates mentioned that they accompanied victims/survivors to a police district station to make a report about a sexual assault or other gender-based violence incident, and the desk officer instructed them to give a verbal account of the incident while standing at the front desk, with numerous other officers and members of the public within earshot. To feel comfortable coming forward, victims/survivors need to be provided with both the appropriate time and private space to fully explain their complaints.

Section IV.B.2 should require both detectives and desk officers to secure a private location when accepting intakes and conducting interviews of victims/survivors. The policy should delete the phrase “if possible.”

Section IV.B.2 should require CPD to provide an officer or detective of a preferred gender or gender-identity to accept a report or conduct an interview when the victim/survivors so requests.

Section IV.B.4 must be revised to recognize that Illinois law mandates that police accommodate a victim’s request for an attorney to be present in the interview. *See* 725 ILCS 120/4(d). The Illinois Attorney General’s comprehensive guidelines on Sexual Assault Response further provide that law enforcement also should accommodate the victim’s request for a support person or advocate if possible.⁵

o. The policy should include examples of “co-occurring and interconnected crimes,” including trafficking, but also remind officers not to ask about immigration status (Section IV.C).

Section IV.C.4. correctly instructs officers to look for “co-occurring and interconnected crimes,” but fails to explain how to do so. We suggest including specific scenarios as Notes or Examples in this subsection.

Along with the instruction to look for co-occurring human trafficking crimes, Section IV.C.4.a. should reference CPD’s policy titled “Responding to Incidents Involving Citizenship Status” (S06-14-03), and remind department members to refrain from requesting, maintaining, or sharing the citizenship or immigration status of any person unless such disclosure has been otherwise authorized. Officers should be aware that victims sometimes experience abuse in the form of threatening to call Immigration and Customs Enforcement (ICE) or threatening deportation.

p. The policy should be revised to clarify the role of the Office of Victim Services (Section IV.E).

Section IV.E should require CPD’s Office of Victim Services (OVS) personnel to advise survivors and victims that their communications with OVS are not private, privileged or confidential, and that OVS can and will disclose their conversations to law enforcement.

Section IV.E should also be revised to add a section that encourages officers to connect survivors and victims with survivor-led organizations focused on outreach and prevention of gender-based violence. Unlike OVS staff, independent advocates for victims of domestic violence and sexual assault have statutory privileges against disclosure of confidential communications. *See* 735 ILCS 5/8-802.1(d) (rape crisis counselor privilege); 750 ILCS 60/227(b) (domestic violence counselor privilege).

IV. The policy should be revised to require CPD to collect and report data on gender-based violence incidents.

⁵ *See* Illinois Attorney General, https://illinoisattorneygeneral.gov/Page-Attachments/Law_Enforcement_Sexual_Assault_Response_Policy-ComprehensiveGuidelines.pdf (last visited May 15, 2025).

The policy should include a section regarding data collection. Important data that CPD should collect includes:

- Demographics (race, sex, gender identity, age, and neighborhood/police district) of those who report gender-based violence
- The total number of reports and categories of gender-based violence incidents by demographics and locations
- Outcomes of cases of gender-based violence, such as cases closed without investigation, cases closed after investigation, cases resulting in arrest, and whether misdemeanor or felony charges were brought
- Data on the efficacy of CPD's Office of Victim Services, such as the number of requests for services, the number and types of services provided, and the frequency that services are declined or that individuals are lost to follow-up.

This data should be de-identified and reported public in the aggregate. We encourage CPD to establish a public dashboard regarding gender-based violence incidents that includes at least the data points above.

We appreciate CPD's consideration of these suggestions and look forward to discussing them further. We would be happy to provide clarification of any of these comments and to connect CPD's office of community policing with any of the organizations with whom we consulted to draft these comments, to the extent CPD and the organizations are interested in further engagement.

Sincerely,

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