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January 15, 2013

BY U.S. MAIL AND FAX OR EMAIL

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Re: CPD monitoring of sidewalk stop-and-frisks

Dear Mayor Emanuel, Corporation Counsel Patton, and Superintendent McCarthy:

I write on behalf of the ACLU of Illinois, and its more than 10,000 members and supporters in the City of Chicago, about monitoring by the Chicago Police Department ("CPD") of sidewalk stops and frisks by officers of civilians. Given the inherent civil liberties and civil rights hazards posed by sidewalk stops and frisks, the best police practice is to mandate thorough officer documentation of all such events, and the creation of a CPD database of all such events that can automatically track patterns over time and place. *See infra* Part I. Unfortunately, the CPD lacks such a database, as shown by CPD policy, and by the CPD's response to two FOIA requests from the ACLU. *See infra* Part II. As a result, many CPD sidewalk stops lack a lawful justification, as shown by the ACLU's analysis of a sample of CPD documentation of such events. *See infra* Part III. These problems are aggravated by recent changes to CPD policy that undermine supervisory review of officers' documentation of sidewalk stops and frisks. *See infra* Part IV. The ACLU now calls upon the CPD to create an adequate sidewalk stops database, and to reinstitute prior CPD policy on monitoring such stops. *See infra* Part V.

I. The need for stop-and-frisk monitoring

When a police officer reasonably suspects that a civilian is engaged in criminal wrongdoing, the officer may briefly detain the civilian for purposes of investigation. *Terry v. Ohio*, 392 U.S. 1 (1968). If the officer reasonably suspects that the detained civilian possesses a weapon, the officer may frisk the civilian. *Id.* Subject to necessary regulations and monitoring, such sidewalk stops and frisks can be a legitimate law enforcement tool.

Exhibit 5

However, there are several inherent civil liberties concerns. First, all sidewalk stops comprise a deprivation of one's freedom of movement, though in some cases for only a short time. Second, all frisks are invasive, and many are frightening and humiliating. *See Terry*, 392 U.S. at 24-25 (describing frisks as a "severe" intrusion and as "annoying, frightening, and perhaps humiliating"); *Florida v. J.L.*, 529 U.S. 266, 272 (2000) (describing frisks as "intrusive" and "embarrassing"). Third, some sidewalk stops and frisks lack reasonable suspicion, which violates the Fourth Amendment as interpreted by *Terry*. Fourth, as with all police practices that rest largely on officer discretion, there is a great danger of bias, conscious or otherwise, resulting in racial disparity in who is stopped and frisked.

Accordingly, the best practice in contemporary law enforcement is for police departments: (1) to require all officers to fully document all sidewalk stops and frisks, including all facts supporting reasonable suspicion; (2) to require supervisory review of that documentation, including whether there was reasonable suspicion; (3) to create a database of all stop and frisk documentation which can automatically identify patterns that may raise civil liberties concerns; and (4) to disclose this data to the public, with appropriate redaction of civilian identifying information. Such monitoring policies can advance efficient department management of officers, government accountability and transparency, and public trust in and cooperation with law enforcement.

For example, a New York City regulation requires quarterly NYPD reports to the City Council regarding the number of sidewalk stops and frisks, broken down by: officer precinct, civilian race, the factors leading to the stop, and whether the stop yielded an arrest or summons. *See* N.Y.C. Adm. Code § 14-150(5). These reports support a valuable public discussion in New York regarding the proper use and regulation of sidewalk stops and frisks. *See, e.g.*, Michael Powell, *Former skeptic now embraces divisive tactic*, N.Y. Times, Apr. 9, 2012; Celeste Katz, *AG Eric Schneiderman eyes NYPD stop-and-frisk*, N.Y. Daily News, Apr. 11, 2012.

Also instructive is the Illinois Traffic Stop Statistical Study Act of 2003. *See* 625 ILCS 5/11-212. To deter and detect any bias-based policing, the Study Act requires collection, analysis, and disclosure of data regarding traffic stops. This critical accountability system was championed by our President when he was an Illinois State Senator. Sidewalk stops and traffic stops raise many of the same civil liberties concerns, though the Study Act applies only to the latter. *See also, e.g.*, U.S. Dept. of Justice, *Principles for promoting police integrity: Examples of promising police practices and policies* (Jan. 2001) at p. 17 ("Law enforcement agencies should consider collecting data regarding the race, ethnicity, and gender of persons subjected to 'Terry' stops and those searched. . . . Agencies should analyze this data to detect violations of agency policy or potential patterns of discriminatory conduct."); *Bailey v. City of Philadelphia*, No. 10-cv-5952 (E.D. Pa.), at D. 16 (consent decree of June 21, 2011), at pp. 3-4 (requiring creation, analysis, and disclosure of an electronic database of all sidewalk stops and frisks).

II. Chicago lacks an adequate stop-and-frisk monitoring database

Unfortunately, the Chicago Police Department does not have a database that documents all sidewalk stops and frisks, and that can automatically analyze patterns that might raise civil liberties concerns. This failure is shown CPD policy (*see infra* Part A), and by the CPD's responses to FOIA requests from the ACLU in 2011 and 2012 (*see infra* Parts B and C).

A. CPD policy

CPD Special Order 04-13-09 regulates the CPD's Contact Information System, in which officers complete Contact Information Cards, and the Department records information from those cards in its Contact Information Database. *See* Exh. 1. This policy imposes three different documentation rules on officers in three distinct situations. First, if an officer performs a sidewalk stop based on reasonable suspicion, but does not arrest the civilian, then the officer *must* complete a Contact Information Card. *Id.* at Part IV(B). Second, if an officer lacks reasonable suspicion, but a civilian voluntarily speaks to the officer, then the officer *may* complete a Card. *Id.* at Part IV(A)(1). Third, if an officer performs a sidewalk stop based on reasonable suspicion, and then arrests the civilian, the officer *may not* complete a Card. *Id.* at Part II(B)(4).

Thus, for purposes of monitoring sidewalk stops and frisks, the CPD's Contact Information Database is both over-inclusive and under-inclusive. It is over-inclusive because it contains many events that are not sidewalk stops and frisks (*i.e.*, voluntary citizen encounters that lack criminal suspicion). And it is under-inclusive because it does not contain many sidewalk stops and frisks (*i.e.*, when there is an arrest).

B. The ACLU's 2011 FOIA request

In April 2011, the ACLU sent the CPD a FOIA request for an electronic version of the Contact Information Database. *See* Exh. 2 at p.2. The ACLU was seeking to identify the number of CPD sidewalk stops and frisks, and variances across time and place.

In July 2011, the CPD disclosed the 177,000 contacts from the Contact Information Database for the six-month period starting in April 2010. *See* Exh. 3. The CPD withheld the officers' narrative in the "reason for stop" section, based on the CPD's assertion that it could not remove civilian identifying information from this many records. CPD FOIA Officer Olivia Medina orally advised ACLU counsel Adam Schwartz that there was no way to determine which of these contacts were sidewalk stops, except by reviewing the officers' narratives. At the request of the ACLU, the CPD automatically searched the narrative section of these contacts for the following words and phrases: detain, detention, frisk, investigatory street stop, pat down, search, suspect, and/or Terry. *See* Exh. 4. In November 2011, the CPD disclosed the 6,500 contacts that contained one of these words, again without the narrative section. *See* Exh. 5. In February 2012, the CPD disclosed a sample of 298 contacts from this set of 6,500, including the narrative section, with redactions of civilian identifying information. *See* Exh. 6.

The ACLU found that 31% of these contacts (91 of 298) were not CPD sidewalk stops. For example, 48 involved the execution of a search warrant, 22 involved a traffic stop, and others included civilians approaching officers, detentions by non-CPD officers, and CPD responses to domestic disturbances.

Thus, for three reasons, the ACLU was unable to use the CPD's Contact Information Database to determine the number of CPD sidewalk stops. First, the Contact Information Database cannot automatically separate sidewalk stops from other events. Second, only 4% (6,500 of 177,000) of the contacts in the Contact Information Database during this six-month period contained a word

or phrase suggesting a sidewalk stop – showing that many contacts in the Database are not sidewalk stops. Third, in the sample of Cards with a stop-related word, only about two-thirds (207 of 298) are actually sidewalk stops – again showing that many contacts in the Database are not sidewalk stops.

C. The ACLU's 2012 FOIA request

In April 2012, the ACLU tried again to use FOIA to learn the number of CPD sidewalk stops. This time, the ACLU requested any kind of documents sufficient to determine the number of sidewalk stops performed by the CPD. *See* Exh. 7.

On April 26, 2012, CPD FOIA Officer Jack Enter orally advised ACLU counsel Adam Schwartz that there was “absolutely no way” the CPD could respond to this request, for three reasons. First, the CPD’s Contact Information Database is the only CPD system that documents CPD sidewalk stops and frisks. Second, many events in that Database are not sidewalk stops (such as traffic stops), and there is no way to automatically distinguish sidewalk stops from other events. Third, many sidewalk stops are not documented in that Database (such as when there is an arrest). The CPD later sent the ACLU a letter formally declining to disclose records in response to this FOIA request. *See* Exh. 8.

In sum, there is a profound lapse in CPD monitoring of sidewalk stops and frisks: the CPD lacks a database of all CPD stops that can automatically identify patterns that raise civil liberties concerns. This lapse has a predictable consequence: unlawful sidewalk stops.

III. Unlawful CPD sidewalk stops

Many CPD sidewalk stops lack a lawful basis, as shown by the ACLU’s analysis of the sample of 298 contacts in the Contact Information Database which contain a stop-related word in the officer’s narrative. *See* Exh. 6. As discussed above, only 207 were actually CPD sidewalk stops. The ACLU examined the officer’s narrative and other pertinent fields for suspicious factors. At the time the officers completed these Cards, CPD policy required them to “briefly and clearly explain the reasons [for the stop] in accordance with” the CPD’s requirement of “articulable reasonable suspicion” of crime. *See* CPD Special Order 03-09 at Part IV(A), as revised by D.S.O. 03-09-B, attached as Exh. 9.

In 10% of these stops (20 of 207), the CPD officer lacked a lawful basis for the stop. The Appendix hereto lists all reasons stated by the officer for these 20 stops. For example, civilian stops rest solely on the following:

- A civilian was walking in an area where someone had been seen with a gun.
- A civilian was “stopped for information” about a “scam.”
- A suspected gang member was “coming from a hot spot” for drugs.
- A civilian was “stopped and interviewed regarding gang activity” at 11:40 p.m.

In another 33% of these stops (68 of 207), it was impossible to determine from the officer's Card whether the officer had a lawful basis. For example: in 26 stops, the officer suspected that the civilian was a wanted person, but did not document any basis for the asserted match; in 13 stops, the officer suspected gang loitering, but did not document critical elements of the City's gang loitering ordinance (*e.g.*, whether the location was a designated "hot spot"); and in 10 stops, the officer asserted "suspected gang or narcotics activity," but did not document what the activity was.

In sum, these CPD officers' Cards show that the officers frequently subjected civilians to sidewalk stops absent lawful justification, and absent proper documentation of a lawful justification. This is caused by the CPD's failure to properly monitor and supervise its officers' sidewalk stops.

IV. The CPD's recent backwards step in monitoring sidewalk stops

Unfortunately, the CPD recently took another backwards step, by repealing three important rules about sidewalk stop monitoring.

In July 2006 and January 2007, the CPD promulgated three salutary revisions to its policy about monitoring and supervising sidewalk stops and frisks. *See* CPD D.S.O. 03-09 (eff. June 14, 2003), as revised by D.S.O. 03-09-A (eff. July 11, 2006) and D.S.O. 03-09-B (eff. Jan. 1, 2007), attached as Exh. 9.

First, the CPD required its officers to use Contact Information Cards to document *all* of the reasons for a stop or frisk. The CPD did so by adding the following language: "When completing a contact card, the officer will briefly and clearly explain the reasons, in accordance with Item III-B of this directive [the part requiring reasonable suspicion for stops and frisks], which lead the officer to make the contact." *Id.* at D.S.O. 03-09-B, *revising* Part IV(A). Further, the CPD specified that officers must use the "narrative section" of the Cards to "describe the reasons for contact" (emphasis added). *Id.*, *revising* Part II(B)(4)(a). The predecessor language improperly instructed officers to document just a singular "reason" for the contact, *id.*, which authorized officers to document fewer than all of their reasons. As a result, if a Card failed to state adequate reasons for a stop, it may have been unclear whether the officer lacked adequate reasons, or had adequate reasons but failed to write them all down.

Second, the CPD required reviewing supervisors to ensure that the Cards conform "to Item III of this directive" – the part requiring reasonable suspicion for sidewalk stops and frisks. *Id.* at D.S.O. 03-09B, *revising* Part IV(E)(1). Previously, the policy more vaguely required review of whether the cards were "properly completed" and "conform[ed]" to the undifferentiated totality of "Department policy and procedures." *Id.* This failed to guaranty supervisory review of whether the Cards state reasonable suspicion.

Third, the CPD required the retention of Cards, and electronic information from those Cards, until at least six months after the completion of the Illinois Traffic Stop Statistical Study Act. *Id.* at D.S.O. 03-09A, *revising* Parts II(B)(5)(b), II(C)(3)(b), IV(A)(5), & VI(D)(1). That Act is now scheduled to sunset on July 1, 2015. 25 ILCS 5/11-212(i). Under this retention rule, Cards and information from them would be retained at least until January 1, 2016 – nearly three years from

now. The prior retention period was only six months, *id.*, which would not allow for meaningful statistical analysis of patterns that raise civil liberties concerns.

The CPD made these three policy changes in response to a lawsuit filed against the City of Chicago by the ACLU on behalf of Olympic gold medalist and speed skater Shani Davis, and three other African American civilians, who alleged sidewalk stops and frisks in violation of their Fourth Amendment rights. *See Davis v. City of Chicago*, No. 03-cv-2094 (N.D. Ill.). Specifically, these three revisions were the subject of extended discussions between the ACLU and the CPD during five settlement conferences supervised by Judge Zagel in 2004 and 2006.

In April 2011, the CPD apparently continued to abide by these three critical rules: at that time, in response to the ACLU's FOIA request for "the current version" of D.S.O. 03-09, the CPD disclosed the version that includes these rules. *See Exhs. 2 & 10.*

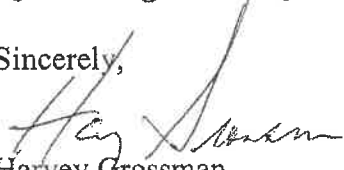
Unfortunately, in February 2012, the CPD promulgated a new version of this policy, which repealed these three critical rules. *See* CPD Special Order 4-13-09 at Part II(B)(3)(b) (stating that the narrative section documents the "reason for contact"); *id.* at Part II(B)(5)(a) (requiring retention of contact cards and information for one year); *id.* at Part II(B)(5)(b) (same); *id.* at Part IV(B) (lacking the required explanation of the reasons for contact in accordance with the requirement of reasonable suspicion); *id.* at Part IV(E)(2) (lacking the required supervisory review regarding the conformity of the card's reasons with the requirement of reasonable suspicion); *id.* at Part V(C)(1) & (2) (requiring destruction of contact cards and information after one year). This repeal is a substantial backwards step in the CPD's monitoring and supervision of sidewalk stops and frisks.

V. Next steps

The ACLU respectfully requests two actions from the CPD. First, the CPD should create a single database of all sidewalk stops and frisks that can automatically identify patterns that raise civil liberties concerns. Second, the CPD should restore the three 2006 and 2007 revisions to its monitoring policy, which unfortunately were repealed in 2012.

By February 5, please advise me of your position on this matter. If you have any questions, please do not hesitate to call me at (312) 201-9740, extension 312, or to email me at hgrossman@aclu-il.org.

Sincerely,


Harvey Grossman
Legal Director
ACLU of Illinois

**APPENDIX:
Twenty CPD sidewalk stops that fail to state a lawful basis**

Contact #	Stated basis for sidewalk stop
6793560	"Detained and questioned in regards to narcotics activity in area", and contact type coded as "gang".
7761297	"Above was passenger in a 1993 chevy blazer which was suspected of having gang members".
7918896	Officer "know[s]" subject.
8117325	Subject "observed with a male who was smoking a cigarette".
8390406	"[S]ubject stopped and interviewed regarding gang activity in area", at 11:40 p.m.
8392672	"[A]bove detained during field interview", and contact type coded as "gang".
8782473	"A possible battery offender", at 9:54 p.m.
8879194	"Stopped for field interview", and contact type and subject coded as "gang".
9024065	Area of narcotics sales, at 10:15 p.m., and contact type coded as "gang".
ACC000050338	Subject "panhandling", at 11:50 p.m.
ACC000052986	"Subject was field interviewed regarding violent crime in his neighborhood, and possible suspects."
ACC000058687	"Subject observed with several burglary offenders", and questioned about "burglaries in the area".
ACC000058761	Call of "a male walking with a gun" in a particular area, and subjects observed walking in that area, at 3:18 p.m.
ACC000063027	Subject observed "in a known gang hangout", and subject and contact type coded as "gang".
ACC000080596	Complaint about narcotics, subjecting "walking" in area, and contact type coded as "gang".
ACC000086280	Call of gang members flashing signs on corner, at 10:05 p.m, and contact type coded as "gang".
ACC000094991	"Community concern" regarding drug dealing "in the immediate area" of a particular address; subject observed on the front porch "next door" to this address; "many" people who reside or gather at this address are "suspected" drug dealers, based on "observations/arrests/field contacts"; and contact type coded as "gang".
ACC000098170	Subject "stopped for information" about "possible suspects involved in deceptive practice (gypse scam)".
ACC000100524	Call about person with gun at particular area, and subject was walking in that area, at 6:15 p.m.
ACC000110015	Subject observed "coming from a hot spot" for drugs, and contact type coded as "gang".

EXHIBIT 1

**CONTACT INFORMATION SYSTEM**

ISSUE DATE:	23 February 2012	EFFECTIVE DATE:	23 February 2012
RESCINDS:	Version dated 08 September 2011, and Special Order 04-13-10		
INDEX CATEGORY:	Preliminary Investigations		

I. PURPOSE

This directive:

- A. continues the Contact Information System.
- B. delineates responsibilities and procedures for:
 - 1. completing both the electronic and hard copy Contact Information Cards and Juvenile Contact Information Cards.
 - 2. maintaining the contact information database.
 - 3. accessing information from the contact information database.

II. GENERAL INFORMATION

- A. The Contact Information System is an investigative tool consisting of two components: contact information cards completed in the field and a contact information database.
- B. Contact Information Cards
 - 1. Contact information cards provide a means for sworn members to document encounters with citizens that may serve a useful police purpose but do not otherwise require any written reports.
 - 2. Contact Information Cards may be completed electronically or by hard copy. Members will complete hard copy Contact Information Cards only when they do not have immediate access to a PDT.
 - a. Hard copy Contact Information Cards (CPD-21.101), printed on white bond paper, will be completed for adult contacts.
 - b. Hard copy Juvenile Contact Information Cards (CPD-21.102), printed on yellow bond paper, will be completed for juvenile (under 18 years of age) contacts.
 - 3. The Contact Information Card contains:
 - a. general information concerning the contact and the circumstances of the contact.
 - b. a narrative section entitled "Reason for Contact" used to describe the circumstances of the contact consistent with Item III of this directive.
 - c. a gang information section to be completed **only** if the sworn member preparing the card determines that the circumstances may involve gang activity.
 - 4. Contact Information Cards will not be completed for persons that are included on any other Department report for that incident (e.g., case or arrest report).
 - 5. Retention
 - a. All Contact Information Cards and contact card information in the electronic database will be retained for one year from the date of completion.

- b. After a card has been retained for one year, members will no longer have electronic access to the card.
 - c. The Director, Records Division, will dispose of both electronic and hard copy Contact Information Cards consistent with Item V-C of this directive.
 - 6. Summary data linked to special employment opportunities, the Performance Evaluation System (PES), and other appropriate applications will be retained within those systems.
- C. Contact Information Database
 - 1. The contact information database, under the management of the Public Safety Information Technology (PSIT) Group, is a database that provides all sworn Department members with computerized access to contact information obtained in the field.
 - 2. PSIT is responsible for the maintenance and integrity of the contact information database.
 - 3. The contact information database can be accessed by all sworn members via the CLEAR system.

NOTE: Information over one year old is not accessible to Department members.

III. CONTACT CATEGORIES

For the purposes of this directive, the following contact categories apply:

- A. **Citizen Encounter** – A voluntary interaction between a sworn member and a citizen that does not involve any suspicion of criminal activity. Citizen encounters can be initiated by either the citizen or the sworn member.
- B. **Investigatory Street Stop** – A contact in which the sworn member has articulable reasonable suspicion that the person is committing, is about to commit, or has committed a crime; consequently, the sworn member has momentarily restricted the person's freedom of movement. The contact should last only as long as necessary to determine if probable cause to arrest exists. Additionally, if the sworn member has reasonable articulable suspicion to believe that the person is armed with a weapon or dangerous instrument, the investigatory street stop may include a pat-down of the outer clothing for weapons consistent with the Department directive entitled "Interrogations: Field and Custodial."

IV. FIELD PROCEDURES

- A. Citizen Encounters
 - 1. A citizen encounter does not require the completion of a contact information card; however, field personnel will complete one if they believe it will serve a useful police purpose.
 - 2. Failure to provide identification during a voluntary citizen encounter, in and of itself, is not grounds for arrest or detention.
 - 3. A citizen encounter can develop into an investigatory street stop if the sworn member develops reasonable suspicion that a crime is taking place, is about to take place, or has taken place.
- B. Investigatory Street Stops

Field personnel who conduct an investigatory street stop that does not result in an arrest are required to complete the appropriate contact information card. The circumstances of the contact will be documented in the narrative portion of the card consistent with Item III-B of this directive.

NOTE: If, as a result of the investigatory street stop, the sworn member ascertains there is probable cause to arrest and effects the arrest, a contact information card will not be completed and the circumstances of the stop and the probable cause for arrest will be documented on the Arrest Report (CPD-11.420) and any required case report as necessary.

- C. If, at the conclusion of a citizen encounter or investigatory street stop, the citizen is unable or refuses to provide identification and there is no probable cause to arrest, the sworn member will:
1. enter "John Doe" or "Jane Doe," as appropriate, in the name field;
 2. complete as much of the card as possible;
 3. indicate the refusal in the narrative field; and
 4. describe the reason for the contact and/or the circumstances of the stop in as much detail as possible, including a description of any unusual clothing, manner, or behavior.
- D. Preparing sworn members will submit the card electronically through a PDT or, if a PDT is unavailable, complete a hard copy contact information card and forward it to a supervisor for approval before the end of their tours of duty.
- E. Reviewing supervisors will:
1. access the CLEAR system to review and approve, as appropriate, electronic contact cards that are properly completed and conform to Department policy.
 2. review both sides of hard copy cards to ensure they are properly completed and conform to Department policy and:
 - a. indicate approval by signing the card in the appropriate field;
 - b. forward the card to the on-duty station supervisor.
- F. Station supervisors

At the beginning of their tours of duty, station supervisors will forward all approved hard copy Contact Information Cards, via the Police Documents Section, to the Data Entry Section, PSIT (Unit 125).

V. OTHER RESPONSIBILITIES

- A. The Director, PSIT, will ensure:
1. data over one year old is rendered electronically inaccessible to Department members.
 2. upon the request of the Director, Records Division, specific contact information cards are purged from the database.
 3. Summary data linked to special employment opportunities, PES, and other appropriate applications are retained permanently within those systems.
 4. all hard copy Contact Information Cards received from the field are accurately entered into the database in a timely manner.
 5. improperly completed or deficient hard copy Contact Information Cards are returned to the originating unit.
 6. once the information is entered, the hard copy Contact Information Cards are forwarded to the Records Inquiry Section (Unit 163), Records Division, for records retention.
- B. Upon the return of improperly completed or deficient contact cards, unit commanding officers will ensure the cards are properly completed and forwarded back to PSIT for entry into the contact card database.
- C. Consistent with Local Records Commission requirements, the Director, Record Division, will:
1. ensure that hard copy Contact Information Cards over one year old are destroyed.

2. request the Director, PSIT, to purge electronic contact information cards over one year old from the database.
- D. The Commander, Inspections Division, will ensure audits of the Contact Information System are conducted on a regular basis.

(Items indicated by *italic/double underline* were added or revised)

Authenticated by: RMJ

Garry F. McCarthy
Superintendent of Police

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