

# EXHIBIT 5



# Examining the Transfer of Oakland Police Department Internal Affairs Investigations to the Civilian- Staffed Community Police Review Agency

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*\* All photos included in this report are courtesy of the City of Oakland*

## Introduction

On May 31, 2021, the Oakland City Council passed Resolution Number 88607, which proposed prioritizing recommendations from the Reimagining Public Safety Task Force in the 2021-23 Fiscal Budget, to “[e]xplore possible transfer, no earlier than July 2022, of most of the Internal Affairs Bureau of OPD to the Community Police Review Agency (CPRA)...” This report, prepared by a private consultant team hired by CPRA, evaluates the potential benefits and challenges in transferring investigative responsibility from the Oakland Police Department (OPD) Internal Affairs Bureau (IAB) to CPRA.

There are some key benefits in transferring the responsibility to CPRA:

**Avoids overlapping responsibilities and inefficiencies:** Currently, both IAB and the CPRA often investigate the same alleged misconduct by OPD sworn officers, resulting in an inefficient duplication of work. Investigators from each agency conduct parallel reviews, collect identical evidence, and may interview the same witnesses and complainants. This overlapping work slows timelines, strains limited resources, and creates confusion around accountability, especially where the ultimate determinations may differ.

Having clearer jurisdictional lines, rather than overlapping investigations, would simplify the complaint investigation process. This would be similar to Chicago’s oversight model, which has its Civilian Office of Police Accountability investigate specific categories of misconduct such as use of force, search and seizure, and sexual misconduct allegations.<sup>1</sup> The Chicago Police Department’s Bureau of Internal Affairs investigates all other complaints of misconduct.<sup>2</sup>

**Reduces obligations of some OPD field sergeants:** A related opportunity lies in reducing the burden on OPD sergeants for Division-Level Investigations (DLI). Field supervisors have been responsible for reviewing a relatively large number of mostly lower-level misconduct allegations, diverting their attention from patrol duties. In the short term, eliminating dual DLI and CPRA investigations should reduce the caseload from field sergeants currently assigned to DLIs. Longer term, as CPRA assumes greater responsibility, it could reduce this burden substantially.

**Civilianizes administrative and intake functions currently handled by OPD sworn personnel:** These positions, such as intake technicians and administrative support roles, generally do not require law enforcement authority and may be managed more efficiently and cost-effectively by trained civilian professionals within OPD and eventually CPRA.

**Increases transparency and independence from OPD:** Having an outside entity lead the investigations into alleged misconduct by OPD officers could create greater public trust that the investigations are complete and objective.

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1. See <https://www.chicagocopa.org/investigations/jurisdiction/>. COPA investigates bias-based verbal abuse, coercion, death or serious injury in custody, domestic violence, excessive force, improper search and seizure, firearm discharge, sexual misconduct, taser discharge resulting in death or serious bodily injury, pattern or practices of misconduct, and unlawful denial or access to counsel.

2 *Id.* These investigations include but are not limited to criminal misconduct, theft, substance abuse, and residency violations.

There are also challenges that must be addressed with such a transition:

**Building Organizational Stability at CPRA:** Both IAB and CPRA have undergone significant changes during the short pendency of this project. These changes, particularly at CPRA, might impact the transition in the short term. Within a period of approximately six months, the CPRA team has seen the departure of its Executive Director and its Director of Training and Policy. It also has seen significant turnover among CPRA's investigators, leaving the agency understaffed. The lone investigation and intake supervisor is a temporary employee whose contract expires this summer. In addition to the above changes at CPRA, there is a new reporting structure at IAB and transfer of IAB's leadership.

**Tackling Funding and Logistical Challenges:** The City's financial issues present real challenges to staffing CPRA to handle more than its docket of Charter-mandated cases and occasional other investigations.

In addition, transitioning cases is not as simple as moving IAB to CPRA. Many officer-involved misconduct cases are dispersed among several dozen field supervisors across OPD. Finding the resources to fund the additional CPRA investigators to handle that case load will cost a significant amount of money absent changes in how these cases are investigated. However, as we outline in our recommendations, there are certain achievable interim steps that the City might implement.

**Addressing Legal Complexities:** Any changes will have to occur thoughtfully and with adequate staffing and funding for the receiving agency (CPRA), particularly against the backdrop of the Negotiated Settlement Agreement (NSA). Any transfer of investigatory authority would need to consider the federal court-monitored NSA, especially in connection with Tasks 2 and 5 of the NSA, which mandate timely and high-quality internal misconduct investigations. Some changes may involve collective bargaining questions for represented employees from OPD and CPRA.

Any transition should move forward in carefully planned phases with the support of a working group staffed by members of CPRA, OPD, and the Commission, among others. As outlined below in the Recommendations Section, Phase 1 involves adequately staffing CPRA to take the lead on Charter-mandated cases and reducing duplication with IAB. Phase 2 discusses a reduction of IAB's role in these cases, while Phase 3 contemplates longer term and more resource-intensive goals such as shifting Division-Level Investigations entirely to CPRA.

This report is a high-level analysis of our observations based on the limited set of information we obtained to both highlight potential issues and make recommendations to the City should it move forward with this plan. It is important to note that this process is filled with legal, fiscal, and collective bargaining complexities, some of which might not be immediately foreseeable. Ultimately, it is the start of an important process that will need to involve key stakeholders and a committed working group to move this potentially path-breaking project forward.



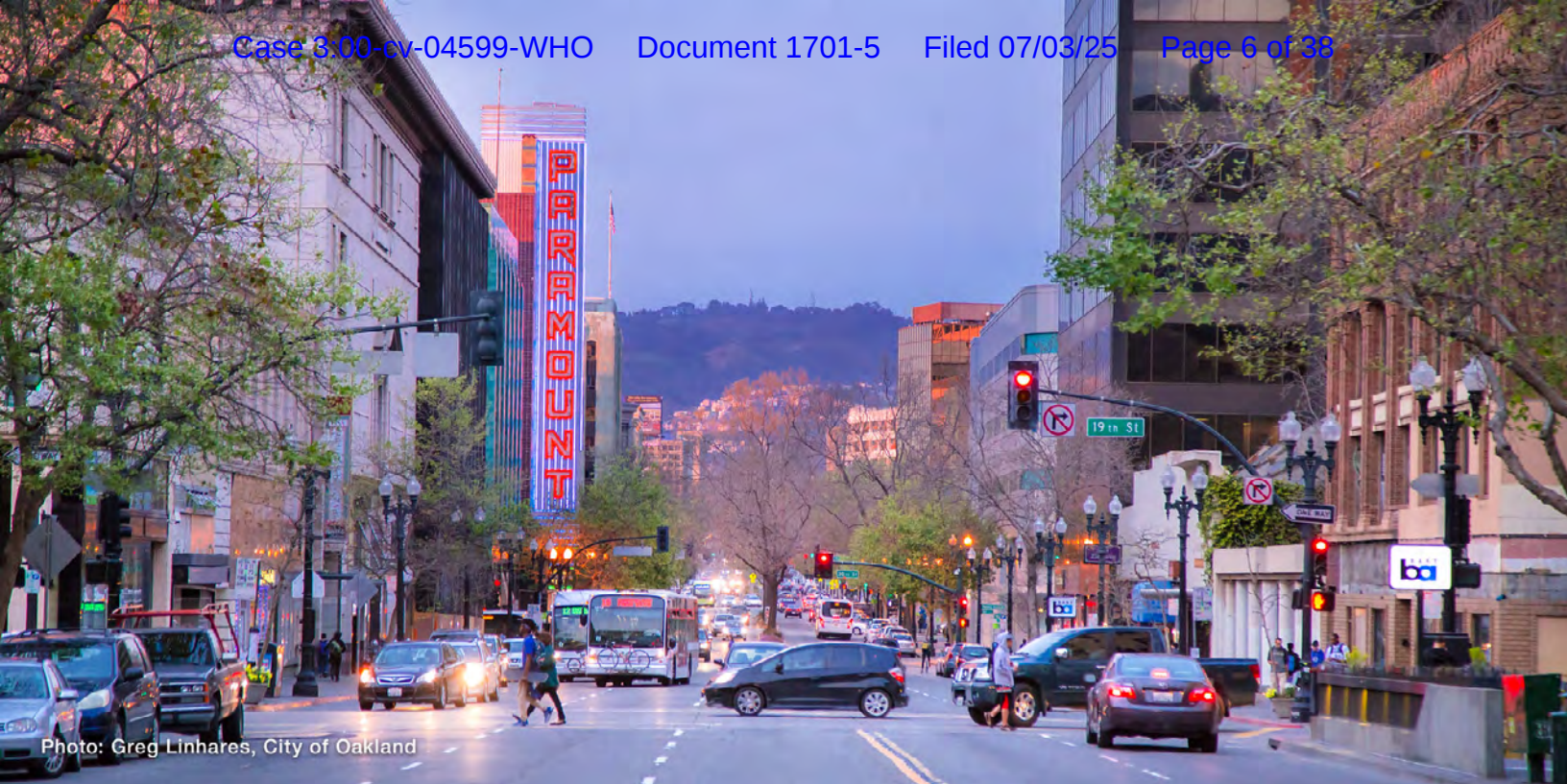


Photo: Greg Linhares, City of Oakland

## Project Background

In the summer of 2024, following a public bidding process, CPRA selected the consultant team from Moeel Lah Fakhoury LLP<sup>3</sup> to examine the feasibility of transferring responsibilities from IAB to CPRA. The project commenced with the consultant team reviewing and analyzing documents and interviewing key stakeholders. During this first phase of the project, the consultant team also conducted interviews with OPD command staff and Internal Affairs leadership, including Chief Floyd Mitchell, and CPRA's investigative, intake, and leadership teams. They also made a series of preliminary requests for information from both organizations relating to staffing, caseloads, structures, and financial information.

Before receiving all relevant information, however, Oakland's financial outlook changed dramatically. In the late fall of 2024, the City of Oakland declared a fiscal emergency that raised the potential for significant budget and staffing cuts to City agencies, including the OPD and CPRA.

Relatedly, CPRA, which issued the Request for Proposals, requested that the consultants initially pause and then limit the contours of their work given the City's looming fiscal uncertainties. The consultants, after conferring with the now former CPRA Executive Director, agreed to largely freeze its information-gathering and formulate a truncated report and analysis while substantially reducing the budget for this project. This project recommended at the end of May 2025, with a draft report submitted two weeks later. Accordingly, this report focuses mainly on potential short-term transitional recommendations.

The consultant team could not have produced this limited report without gleaning useful information and insight from key stakeholders, including from numerous members of OPD and CPRA, the City Attorney's Office, and others. We thank each department and agency and its members for providing useful information on background, context, and ideas for a phased transition. The team is deeply appreciative of their helpful participation in this project.

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3. The consultant team was led by MLF Managing Attorney Andrew Lah and subcontractor Russell Bloom.

## Oakland's Current Investigative Structure

A summary of IAB's and CPRA's current investigative structures is below. These operational workflows highlight certain inefficiencies within the current system and opportunities for improvement that tie into our recommendations.

As a baseline, both agencies investigate allegations of violations of the Oakland Police Department's Manual of Rules (MOR). Both agencies properly use the same four categories of findings for completed investigations—sustained, not sustained, exonerated, and unfounded—based on a preponderance-of-the-evidence burden of proof.

OPD has been subject to the Negotiated Settlement Agreement (NSA) resulting from *Allen vs City of Oakland* since 2003.<sup>4</sup> The conditions principally at issue with any transfer of responsibilities from IAB to CPRA include Tasks 2 and 5 of the NSA, which govern Timeliness Standards & Compliance with IAB Investigations and Complaint Procedures for IAB.

Under NSA Task 2, at least 85% of Class I misconduct investigations and at least 85% of Class II misconduct investigations must be completed within 180 days to be considered timely.<sup>5</sup> The Department MOR incorporates these timelines and other NSA requirements into various MORs. Any changes stemming from a transfer in responsibilities from OPD to CPRA will need to be updated in the OPD's policies and after conferral with the City Attorney's Office.

The NSA requires OPD to adopt and implement written policies and procedures governing the intake, classification, investigation, and documentation of internal misconduct complaints.<sup>6</sup> Task 5 mandates that OPD enact a policy requiring a supervisor to respond within three hours of being notified when a complaint is received in the field. If this does not occur, there needs to be documentation in the complaint form as to why that did not occur.<sup>7</sup> The NSA further requires that all complaints must be classified as either Class I or Class II and entered into IAB's complaint tracking system.<sup>8</sup> The Department must ensure that supervisors, IAB personnel, and other relevant staff receive appropriate training on the intake and classification of complaints.<sup>9</sup>

The NSA requires full investigations of every misconduct claim regardless of its type. Investigators must assess and document the credibility of all involved parties and summarize those assessments in their investigative reports.

### A. IAB

IAB is the internal unit within OPD responsible for investigating complaints of alleged misconduct. Governed by departmental policies and state laws, such as the California Peace Officer Bill of Rights,

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4. *Delphine Allen et al. v. City of Oakland*, No. C00-4599 TEH (N.D. Cal. 2003).

5. Ninth NSA Sustainability Period Report of the Independent Monitor for the Oakland Police Department; available at <https://cao-94612.s3.us-west-2.amazonaws.com/documents/OPD-Sustainability-Report-9-122024.pdf>

6. *Id.*

7. *Id.* at 9.

8. *Id.* at 13

9. *Id.* at 23

IAB investigates a range of issues, including complaints of misconduct against sworn and unsworn employees.<sup>10</sup>

**IAB's Units:** IAB's structure is broken down into the following main units: The Intake and Administration Units, IAB Investigations, and IAB DLI.<sup>11</sup> Each of these sections has a Commander who reports to the IAB Commander.<sup>12</sup> IAB has a publicly available Internal Affairs Policy and Procedure Manual that outlines the unit's general operating procedures.<sup>13</sup>

**Class I and Class II Offenses:** OPD categorizes misconduct allegations into two distinct categories: Class I and Class II.<sup>14</sup> Class I offenses are the most serious and, if sustained, can lead to severe disciplinary consequences including suspension, termination, or even criminal prosecution. These offenses include use of excessive force<sup>15</sup>, dishonesty (such as perjury or falsifying reports), insubordination, criminal conduct, bias-based policing, retaliation, and obstruction of investigations.

Class II offenses are considered less severe for disciplinary purposes and often involve violations such as failure to perform duties, improper handling of equipment, or discourtesy.<sup>16</sup> These may be addressed by supervisors through informal or corrective action unless they reveal a broader pattern of misconduct or rise in severity, in which case they may be elevated to Class I status.<sup>17</sup>

**Case Tracking:** All of IAB's cases (whether an IA Investigation or a DLI) are captured in Vision, IAB's case management database. Vision is a proprietary database created for Oakland in part to better assist OPD in abiding by the NSA's reporting requirements and to centralize OPD's human resources information. It allows investigators to log their investigative steps into an investigative chronology and stores pertinent documents and reports within each case file. The OPD managers we interviewed discussed certain limitations with Vision, such as its inability to sync with calendars to create deadlines, but it is a functional database that can allow appropriate IAB employees to work within electronic case files. It also can create 180-day reports as required under the NSA and monitor statute of limitations deadlines.

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10. See DGO M-3.1 (the "Department shall investigate all misconduct complaints from any source (including anonymous) against a member or employee...").

11. Departmental General Order 23-04; Use of Force Reporting and Review Responsibilities.

12. *Id.*

13. Internal Affairs Policy and Procedure Manual ("Manual"); available at <https://public.powerdms.com/oakland/tree/documents/222>.

14. The OPD Manual of Rules also categorizes uses of force into four distinct levels. Level 1 represents the most serious incidents, encompassing any use of force that results in death, poses a substantial risk of causing death, or leads to serious bodily injury. Level 2 includes significant uses of force that, while not resulting in serious injury, involve substantial physical impact or the use of weapons such as tasers or batons. Level 3 covers moderate uses of force, such as physical strikes or control holds that do not cause serious injury. Level 4 pertains to the least severe instances, including minimal physical contact or the use of verbal commands to gain compliance.

15. Uses of force are Class I violations.

16. Oakland Police Department, Manual of Rules (last accessed June 10, 2025).

17. *Id.*



**Other IAB Functions:** In addition to the administrative investigative function, IAB staff serve numerous other functions within OPD. These other responsibilities include:

- Non-sworn employee investigations.
  - Compliance with SB 2: This is a state-mandated requirement that, among other things, commands the “agency employing peace officers” to update results of officer-involved misconduct investigations to the California Commission on Peace Officers and Standards and Training.<sup>18</sup> IAB has sworn personnel in intake working on SB2 requirements, which involves flagging appropriate cases and updating the allegations and outcomes in Vision.
  - *Pitchess* and *Brady* Obligations: IAB personnel are responsible for ensuring compliance with *Pitchess*<sup>19</sup> and *Brady/Giglio*<sup>20</sup> obligations by managing requests involving officer personnel files and exculpatory evidence. This includes preparing records in response to *Pitchess* motions, appearing in court for in-camera review, and maintaining a log of motions and judicial outcomes. For *Brady/Giglio* compliance, IAB staff research officer complaint histories to identify any potentially exculpatory or impeachment-related information. They then document those inquiries and maintain records of all such requests. These duties are coordinated by the designated *Pitchess* Officer to ensure lawful disclosure and evidentiary integrity.<sup>21</sup>
  - Integrity Testing: The IAB commanders we interviewed noted that this was not a substantial time commitment within IAB.
  - FRB/EFRB: The lead investigator and commander of IAB must present their case and the evidence they glean to the Force Review Board or Executive Force Review Board. The Force Review Board (FRB) is convened to review all Level 2 use of force incidents, while the Executive Force Review Board (EFRB) reviews Level 1 use of force incidents, in-custody deaths, vehicle pursuit-related deaths, and other cases designated by the Chief of Police.<sup>22</sup>
- When a case has been investigated administratively by IAB, the assigned IAB investigator is

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18. Cal. Penal Code § 13510.9 (West). This amendment to the Penal Code, also referenced as SB 2 for the enabling legislation, requires the agency to notify POST of any employment changes (hiring or departure from the agency) as well as any “complaint, charge, or allegation of conduct against a peace officer employed by that agency that could render a peace officer subject to suspension or revocation of certification by the commission...” This includes reporting on the final disposition by the employing agency or a civilian oversight entity that the officer engaged in conduct that could subject the officer to suspicion or a revocation of certification, regardless of the discipline imposed.

19. Manual at 31.

20. *Brady v. Maryland*, 373 U.S. 83(1963) and *Giglio vs. United States*, 405 U.S. 150 (1972) are U.S. Supreme Court cases which require that exculpatory information be provided to a criminal defendant to protect their Due Process Rights under the Fifth Amendment. *Giglio* clarified that impeachment evidence must also be disclosed to the defense to comply with the Constitution. Because IAB investigates misconduct that can be considered *Brady* or *Giglio*, there must be appropriate processes to ensure that information is disclosed to prosecutors and ultimately the defense if appropriate.

21. Manual at 31.

22. Department General Order K-4.1, §§ I–VI, pp. 1–16

required to present the completed use of force investigation and all relevant materials to the Board. IAB must provide the Board Chairperson with the complete investigative file within four calendar days of notification. Boards are not convened until the IAB investigation is finalized. CPRA also participates in these meetings.

**IAB's Budgeted Positions:** In 2024, IAB was authorized the following 32 positions:

Classification	Authorized
Administrative Analyst II	1
Captain of Police	1
Intake Technician	6
Lieutenant of Police	3
Police Officer	4
Police Records Specialist	2
Police Records Supervisor	1
Sergeant of Police	14

IAB is budgeted for 22 sworn positions or varying ranks.

The proposed budget for 2025-27 also authorizes 32 positions.<sup>23</sup> The total cost for IAB in 2026 is projected to be \$10,249,660.<sup>24</sup> The cost for 2027 is projected to be \$10,742,960.<sup>25</sup> IAB's proposed budget is just below 3% of the total OPD budget.<sup>26</sup>

A summary of IAB's units is below.

### **i. Intake & Administrative Section:**

The Intake and Administrative Section receives and processes complaints, makes recommendations to open or administratively close complaints, and serves as IAB's custodian of records on both the front end (data and processing) and the back end (preparing disciplinary records). This section also houses OPD's *Pitchess* Officer and responds to *Brady* and *Giglio* inquiries.

The IAB Intake and Admin team works five days a week and handles complaints and intakes that arrive during their shifts. Any off-hours complaints are taken in the field by supervisors or by the communications staff and entered into a daily log. IAB processes cases received during the weekend on the following Monday.

An Intake Officer or Technician processes the complaints and recommends a disposition, which is then reviewed by the Intake Supervisor, an OPD sergeant. After this review, the Intake and Administrative Section Commander reviews the case and recommends that the case be administratively closed or opened as a full investigation.

23. See <https://controlpanel.opengov.com/transparency-reporting/oaklandca/3de931f5-b904-4bd5-9714-3d37bd203e94/4dab3eeb-5c99-477e-8fe9-31666ad7b33c?savedViewId=63c51663-055f-4176-85ff-e1bb8fa8a17e>

24. *Id.*

25. *Id.*

26. *Id.*



On the back end, in cases involving substantiated findings resulting in discipline, IAB's record specialists create most of the documents relating to discipline, including Skelly packets and discipline notices. This section also tracks discipline cases.

**Staffing:** IAB's Intake and Administrative Section is staffed by six intake technicians, several sworn officers, a sergeant, and a team of four additional professional staff. IAB has also received assistance as needed from light-duty personnel to assist with IAB's workload.

## ii. Division-Level Investigations (DLI)

Following an intake review, the Intake and Investigative Division Lieutenants determine whether an open investigation will stay in IAB or be referred to a field supervisor as a DLI. A DLI is a "formal investigation into allegations of misconduct that is conducted outside the Internal Affairs Bureau. DLIs are subject to the same investigative requirements as those conducted by IAB investigators."<sup>27</sup> DLIs usually involve Class II allegations, but Class I allegations may be sent out as a DLI if the IAB Commander approves.<sup>28</sup>

Generally, higher profile or more complex investigations stay within IAB Investigations. Many of the other cases—DLIs—get dispersed across the OPD bureaus for a field supervisor to investigate. The IAB DLI team acts as liaison with the field sergeants assigned DLIs until the investigations are completed. At times, following IAB reviews, the case is sent back to the field supervisor for further investigation.

27. Manual at 54.

28. *Id.*

Most of OPD's misconduct complaints are handled by OPD field supervisors through the DLI process rather than through IAB Investigations. Once assigned to a DLI case, the field supervisor will conduct a full investigation or, if the allegation can be resolved by reviewing the involved officer's body-worn camera (BWC) recording(s), then the field investigator can request through the chain of command to make a summary finding that the case be exonerated or unfounded. Fully investigated cases go up to the area bureau captain for approval and then back to IAB's DLI investigators, who review the file and determine whether there is sufficient evidence to support the findings. The DLI Lieutenant will then agree or send it back to the field for further investigation, if needed. If the finding is not sustained, the case goes to the IAB captain for final review.

DLIs are maintained in Vision just like IAB Investigation cases. In cases where CPRA is also investigating a DLI, there is a check box in Vision to indicate that both agencies are investigating.

In terms of tracking deadlines, the 180-day report is generated from Vision under the "Reports" tab and is downloaded as an Excel sheet. In addition, the Bureau of Field Operations East and West maintain a tracking sheet to stay apprised of deadlines. Any case older than 55 days from the date of complaint will appear on the tracking sheet so that all relevant supervisors are aware of any upcoming deadlines.

**Staffing:** Within IAB, a three-person team is responsible for monitoring and reviewing DLI investigations from field supervisors. This staff includes a DLI Commander (Lieutenant)<sup>29</sup>, a DLI Coordinator, (Sergeant)<sup>30</sup>, and a DLI Section Analyst (Administrative Assistant II).<sup>31</sup> This staff works to monitor, review, and process DLI cases and coordinates with the CPRA on dual-investigation cases.

**Workload Concerns:** In terms of workload, virtually all the OPD leadership and staff we met raised concerns about the current DLI process and the burden it placed on field supervisors. A high-ranking OPD official who monitored DLIs opined that approximately 60 to 70 field sergeants (and sometimes lieutenants) could be working on one to two DLI cases at any given time. DLIs may also require certain other supervisors to get involved to monitor the process.

OPD has had between 111 and 120 sergeants over the past five years, and the OPD official believed that a pool of more than 80 sergeants received DLIs. That pool, however, is reportedly shifting because certain sergeants have proven more adept or reliable at handling complaint investigations. Accordingly, those sergeants are assigned cases more frequently and have had to work overtime to handle DLIs.

According to an informal analysis done by an OPD executive, DLI investigations average about 30 hours of work per case. Of course, the actual hours can vary quite a bit: a single discourteous statement from one officer to a single complainant will be less resource intensive than a use of force involving multiple witnesses and officers.

Some IAB supervisors also expressed concern that it is highly inefficient for field supervisors to have to prepare full reports for less serious Level 2 cases. According to these supervisors, these resources should be put into more serious Level 1 cases, but the NSA does not distinguish between case types.

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29. Manual at 39.

30. *Id.* at 41.

31. *Id.* at 43.



### iii. Investigations Section

IAB's Investigations Section is responsible for completing investigations assigned to IAB, which are often the more serious, high-profile, or complex investigations.<sup>32</sup> Under Department General Order M-03, OPD is required to accept and investigate fairly and impartially all complaints of alleged employee misconduct to determine the validity of allegations and to impose disciplinary actions that are justified in a timely and consistent manner. IAB Investigations also has a Force Investigation Section (FIS) which primarily responds to Level 1 force incidents, such as officer-involved shootings.<sup>33</sup> The IAB sergeants who are part of FIS are “standby” investigators who receive “standby pay” and are assigned a Department vehicle to respond to all call-outs within one and a half hours of notification from the FIS Commander (a sergeant).

Notably, OPD differentiates between misconduct complaints and “service complaints,” which may be received from any source regarding inadequacies in policy, procedure, practice, service level, legal standard or statute that “would not result in discipline.”<sup>34</sup> These service complaints must be assigned an IAB case number and must be documented in the IAB database, but they are not identified as misconduct allegations. OPD may also address Class II misconduct complaints informally wherein a supervisor, commander, manager, or investigator may resolve a complaint by “addressing and resolving the issues with the complainant and the member or employee.”

The IAB Commander is responsible for ensuring that all complaints, whether received internally or externally, are formally logged, assigned to either the IAB or a division-level investigator, and classified based on severity. This includes generating control files, identifying involved personnel, establishing case due dates, and entering all data into IAB databases. The Commander reviews recommended dispositions and ensures appropriate documentation flows to the involved personnel, their supervisors, and relevant command staff. A Preliminary Inquiry (PI) must be initiated within 14 days, including interviews with the complainant and witnesses, gathering evidence, and reviewing body-worn camera footage. The PI culminates in one of four outcomes—further investigation, supervisor-level handling, administrative closure, or a summary finding—with such closures requiring high-level approval, but minimal additional investigation if existing evidence is deemed conclusive.

Administrative responsibilities during a PI also include providing the complainant with a complaint packet, informing them of their rights, and maintaining secure records. If a disagreement arises regarding the recommended resolution, the matter is escalated to IAB for final adjudication. All complaint memoranda undergo a formal review by the first-level commander for quality, completeness, and appropriateness, with dissent documented and forwarded to IAB within seven days.<sup>35</sup>

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32. See Internal Affairs Policy and Procedures Manual at 24.

33. Level 1 and Class 1 are distinct but overlapping concepts. The MOR breaks down uses of force into levels. A level 1 use of force represents the most serious incidents, encompassing any use of force that results in death, poses a substantial risk of causing death, or leads to serious bodily injury. Use of force is also a Class 1 violation.

34. Oakland Police Department, General Order M-03: Use of Force Reporting and Investigation (rev. June 6, 2018), available at <https://cao-94612.s3.amazonaws.com/documents/M-03-Use-of-Force-Reporting-and-Investigation.pdf>.

35. *Id.*

The Investigations Section ensures that the IA Intake Checklist was followed, including ensuring that the complainant was contacted and the allegations were properly categorized by Intake.<sup>36</sup> The IAB investigator also canvasses for witnesses; obtains medical, arrest, and other records; prepares administrative search warrants; refers potential criminal conduct to CID; and conducts appropriate interviews.<sup>37</sup> When the investigation is completed, the sergeant prepares a report of investigation that goes up IAB's chain of command.<sup>38</sup>

The Investigations Section must coordinate with CPRA, since many of IAB's cases will also be Charter-mandated cases within CPRA's jurisdiction. Department General Order M-03.2 outlines requirements for member and supervisor cooperation with CPRA investigations. This includes responding to interview notices; contacting CPRA investigators within three on-duty working days; and complying with investigatory directives, including the production of incident-related records, within 10 calendar days.<sup>39</sup>

IAB supervisors are responsible for ensuring that investigatory records are delivered promptly. Failure to adhere to these mandates could subject members to potential disciplinary action.<sup>40</sup>

**Staffing:** The Investigations Section is staffed with an Investigations Section Commander (Lieutenant), a team of approximately 6-8 investigators (Sergeants), and administrative support staff (Administrative Assistant II). Under the NSA, IAB is also responsible for increasing staffing if needed to timely investigate complaints.

**IAB Intakes:** As the data indicates, IAB's intakes have increased since 2019. According to a high-ranking OPD official, this is because the Department underwent a wide-scale retraining on taking complaints which led to an uptick in the number of intakes.

We also received data from IAD regarding the number of DLIs and IAB investigations by year. However, we were later informed by OPD that the initial data we initially received appears to be inaccurate and undercounted. The IAD Commander recently confirmed that the Department adjudicated over 764 DLI cases in 2024. We did not receive complete data in time for this report due to an accelerated completion time following the project being largely paused. The working group will need to receive that data and ensure properly captures the actual number IAB and DLI cases, as this data will impact the transition.

	2019	2020	2021	2022	2023	YTD 2024
<b>Intake</b>	1450	1621	1565	1747	2070	1399
<b>IAB Investigations</b>	94	114	138	108	143	95

Class II violations have increased during the past two years. In terms of "Other" cases, a number of IAB cases are administratively closed or involve MOR violations that are not Class I or Class II violations.

36. See Internal Investigations Procedures, Index Number V-T1, pp 7-15.

37. *Id.*

38. *Id.*

39. Oakland Police Department, Departmental General Order M-03.2: Community Police Review Agency (effective Sept. 11, 2020), available at <https://public.powerdms.com/oakland/tree/documents/443>.

40. *Id.*



	2019	2020	2021	2022	2023	2024 (Partial)
<b>Class I</b>	222	245	186	224	266	192
<b>Class II</b>	431	500	493	531	692	511
<b>Other<sup>41</sup></b>	797	876	886	992	1112	696
<b>Total</b>	<b>1450</b>	<b>1621</b>	<b>1565</b>	<b>1747</b>	<b>2070</b>	<b>1399</b>

**OPD Concerns About Transition to CPRA:** OPD personnel whom we interviewed raised a range of questions and concerns about a transition to an outside agency. A common concern that many OPD persons shared involved how a transfer might impact the NSA, and particularly Tasks 2 and 5. Relatedly, OPD staff raised questions about CPRA's staffing and whether the City would or could adequately fund the agency. Some IAB staff mentioned that in many instances they had completed their investigation and were waiting for CPRA to finish their parallel case because CPRA did not have enough investigators to move the investigations forward.

Some OPD staff raised concerns about the relative inexperience of recent CPRA hires and noted that any misconduct investigations had to be fact-bound and evidence-based. Another concern raised was the potential for bias in the process, particularly in disciplinary recommendations from CPRA, which some OPD staff found overly punitive. One relatively consistent statement, however, was the preference to have DLIs reduced or removed from field supervisors. Some OPD supervisors mentioned that DLI sergeants were not as well trained or well versed in these cases and DLIs often had to get sent back for additional work.

## B. Oakland Police Commission and CPRA

The Oakland Police Commission<sup>42</sup> oversees the Oakland Police Department to ensure that its policies and practices conform to constitutional policing standards. The Commission also oversees CPRA, which is the Commission's investigative branch and recommends discipline for substantiated misconduct.<sup>43</sup>

**CPRA's Jurisdiction:** CPRA is statutorily required to investigate categories of alleged misconduct, often called mandated allegations. Those categories consist of "public complaints involving uses of force, in-custody deaths, profiling based on any of the protected characteristics identified by federal, state, or local law, untruthfulness, and First Amendment assemblies."<sup>44</sup> CPRA is directed by the Commission to investigate other matters of alleged misconduct of sworn OPD employees. Accordingly, CPRA and IAB will often conduct parallel investigations into the same alleged incidents of misconduct.

41. Cases noted in the "Other" category are service complaints or complaints that do not relate to the MOR. They have complaint numbers but are administratively closed.

42. The Police Commission is comprised of seven regular and two alternate members, enabled by Oakland City Charter section 604. All commissioners are Oakland residents and serve in a volunteer capacity. (<https://www.oaklandca.gov/boards-commissions/police-commission>; Last accessed June 2, 2025).

43. The Office of the Inspector General, led by the civilian Office of Inspector General for the Department, is also under the Commission's purview.

44. Oakland City Charter § 604(f)(1).



**Required Investigative Timelines:** In terms of timing, the CPRA is required to make “reasonable effort” to complete its investigations within 180 days.<sup>45</sup> In circumstances where the CPRA cannot meet the 180-day date, the CPRA is required to complete the investigation within 250 days of the filing of the complaint unless the Agency Director makes written findings of exceptional circumstances in a particular case beyond the Agency’s control.<sup>46</sup> Of course, CPRA is required to abide by California Government Code section 3304’s one-year statute of limitation.

**Mandated Staffing Requirement:** The Oakland Charter mandates that CPRA “shall consist of no fewer than one line investigator for every one hundred (100) sworn officers in the Department, rounded up or down to the nearest one hundred (100). The number of investigators shall be determined at the beginning of each budget cycle based on the number of sworn officers employed by the Department the previous June 1. At least one investigator shall be a licensed attorney.”<sup>47</sup>

**CPRA’s Investigative Process:** CPRA, like IAB, also utilizes intake and investigative teams to initially review and then investigate appropriate cases.

### 1. Intake:

CPRA currently has three full-time intake technicians who process complaints from IAB and from the public. The intake technician is responsible for reviewing the complaints, obtaining relevant evidence such as body-worn camera (BWC) footage, and identifying potential OPD policy or legal violations. This includes identifying potential violations that the community member may not have expressed. Intake technicians also flag the relevant portions of BWC footage for investigators or supervisors and request documents

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45. *Id.* at 604(f)(3).

46. *Id.*

47. *Id.* at 604(e)(4)

from IAB. CPRA currently has one supervisor (Investigator III), who is on a temporary contract, to oversee all intake technicians and investigators. CPRA has been allocated two Investigator III positions in the past, but that second position was frozen due to budget constraints.

Once this process is completed, the Investigator III will review the summary and may recommend a finding based on the available evidence, forward the case to an investigator, or return the case to the intake technician for further steps. There was a period when the reviewing employee varied because the Investigator III was initially hired on a part-time contract and was later rehired as a full-time employee after a gap in employment.

It should be noted that at both CPRA and IAB, the intake process serves as a preliminary investigation. The intake process is also used for both agencies to administratively close cases where the allegations can be resolved by BWC or other available evidence without investigating further. This ultimately allows for a more targeted use of investigative resources for those other cases.

**Timelines in Intake:** CPRA was unable to provide complete data analysis on how long the intake process takes. The CPRA's most recent annual report notes: "In July 2023, informal CPRA staff polling and partial data analysis indicated that it was taking approximately seven months, on average, for a case to proceed from the intake stage to supervisory review. With the same standard of analysis, as of May 2024, this time had been cut at least in half. By August 30, 2024, the oldest case at the intake stage was 64 days old, and the average case at the intake stage was 36 days old."<sup>48</sup>

This excerpt reveals three things of note. First, it demonstrates that CPRA can dramatically reduce the time for its intake process. Second, although that reduction in time in intake is laudable, CPRA should ensure its processes have some flexibility to allow an investigator to respond more quickly in cases where a complainant may have visible injuries or where canvassing for evidence needs to be done quickly. The third point is a broader observation: CPRA reliance on "informal CPRA staff polling" highlights the urgent need for the agency to have a more robust and consistently utilized case management platform that can reliably and accurately report data.

## **2. Investigators:**

CPRA's investigations generally follow this process. After being assigned a case, investigators review the initial evidence collected during the intake process and obtain any additional evidence. Investigators also interview witnesses and complainants as appropriate. CPRA usually interviews OPD officers toward the end of their investigations, often with their IAB or OPD DLI counterparts. CPRA has at times interviewed OPD trainers as part of its use-of-force investigations.

Once all the available evidence is obtained, the CPRA investigator prepares a Report of Investigation detailing the pertinent facts, the relevant policies, the analysis of the facts as applied to the policies, any credibility analysis, and investigative findings.

**Working with OPD:** Some investigators reported difficulties communicating with DLI investigators but found IAB more responsive. In terms of obtaining documentary evidence, CPRA investigators we interviewed said IAB was generally accommodating to their requests, and, according to longer tenured

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48.FORECAST OF CPRA REPORT-OUT FEBRUARY 27, 2025, at p. 9. Available at CPRA-Report-Forecast-02.27.25.pdf

staff, IAB's response time has improved substantially over the past several years.

The most common concerns raised included OPD investigators using leading questions in interviews or failing to ask challenging or probing questions during interviews. Another critique was that IAD did not recommend discipline commensurate with the seriousness of the misconduct. Some CPRA staff also reported that the IAB has at times categorized serious allegations such as untruthfulness as less serious performance issues, thereby limiting any disciplinary or preventative impact. There was concern that DLI investigators were slow in their response times to CPRA's requests for information and that the quality of those investigations was lacking.

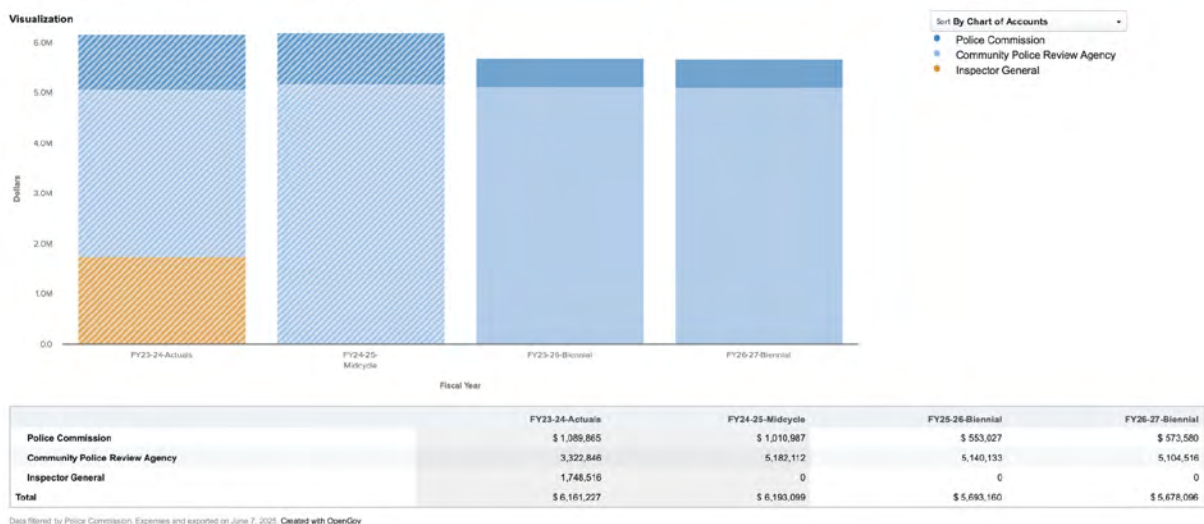
**Investigator Staffing:** CPRA has seen its investigator staff drop dramatically in the past seven months due to Oakland's fiscal emergency. CPRA is currently budgeted to receive seven Complaint Investigator II positions and one Complaint Investigator III position.<sup>49</sup>

	2024-25 Adopted Midcycle FTE	2025-26 Proposed Biennial FTE	2026-27 Proposed Biennial FTE
Administrative Analyst III	2	1	1
CPRA Attorney	2	2	2
Complaint Investigator II	7	7	7
Complaint Investigator III	1	1	1
Crime Analyst	2	2	2
Executive Director CPRA	1	1	1
Intake Technician	3	3	3
Project Manager	2	2	2
Total	20	19	19

This would largely return investigative staffing back to mid-2024 levels before the fiscal crisis impacted the City but below the budgeted positions CPRA had in 2023 and 2024. CPRA's allocated budget Fiscal Year 2025-2026 is \$5,140,133.

Department	Year	FTE
Police Commission	2027	19
Police Commission	2026	19
Police Commission	2025	20
Police Commission	2024	25
Police Commission	2023	26
Police Commission	2022	18
Police Commission	2021	17
Police Commission	2020	17

49. CPRA Budget, available at <http://bit.ly/45vRgu0>

**!!!FY25-27 Proposed Financial Category**

The recent attrition has negatively impacted CPRA's investigative capacity. CPRA's Forecast from February 2025 explicitly notes: "CPRA is currently struggling to complete its Charter-mandated functions and duties. Additional cuts risk leading to missed statute of limitations deadlines, noncompliance with the Charter and ordinance, and serious impacts to the City's police accountability efforts."<sup>50</sup> That Forecast also noted that CPRA had approximately 110 pending cases, with an average time from case receipt to case close of 285 days (an increase of 2.3% from December 2024).

After that Forecast, CPRA lost another investigator. In terms of their investigator staffing as of the date of this report, CPRA currently has one temporary supervisory Complaint Investigator III, two Complaint Investigator IIs, and two temporary Crime Analysts performing investigative duties. As the Chair of the Police Commission has recognized, "staff turnover due to budget cuts comes with its own significant cost, as familiarity with Oakland's specialized oversight system is developed over years of experience."<sup>51</sup> CPRA's operational challenges must be addressed before it can reasonably absorb duties from IAB.

### **CPRA Staff Concerns About Transition:**

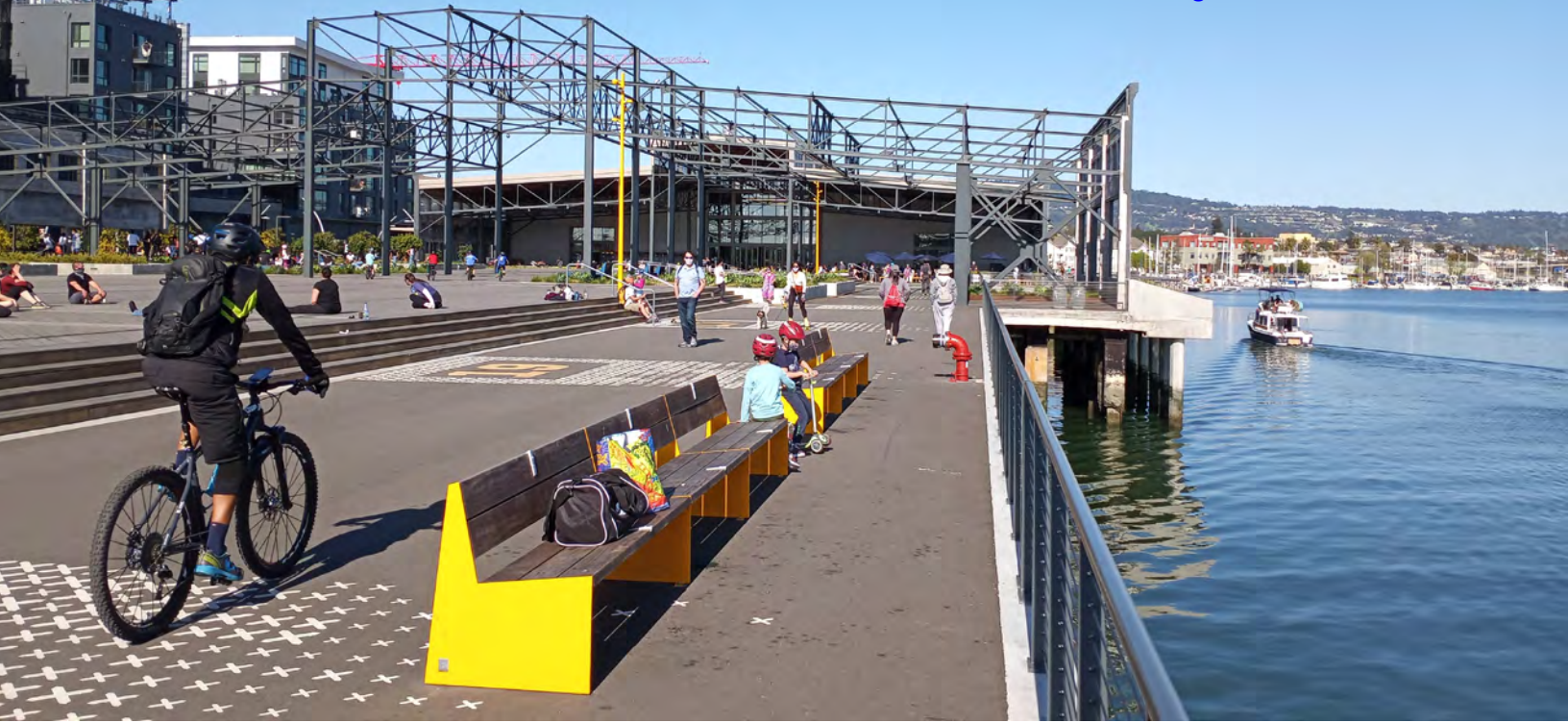
**Reducing Turnover:** CPRA is currently being headed by its fifth permanent or interim Executive Director since mid 2023. The prior Executive Director, from whose staff we received much of the information for this report, left the City in March 2025. We strongly believe CPRA must address its leadership situation before moving forward with a transition.

CPRA staff raised concerns about assuming a greater caseload without a commitment to fully funding the agency and to reducing turnover. The current interim is taking concrete steps to hire permanent investigative and other staff, and this process should continue in order to comply with the Charter's staffing mandate for CPRA.

50. <https://cao-94612.s3.us-west-2.amazonaws.com/documents/CPRA-Report-Forecast-02.27.25.pdf>

51. Statement from the Chair of the Police Commission RE: Adequate Funding for Effective, Legally Mandated Civilian Police Oversight. Available at [https://drive.google.com/file/d/1EGjqConFGm\\_8b2AesLjFJ1qtNM6JnICT/view](https://drive.google.com/file/d/1EGjqConFGm_8b2AesLjFJ1qtNM6JnICT/view)





**Need for a Database and Standard Procedures:** Numerous CPRA staff whom we interviewed in 2024 noted that the agency lacks a proper investigative database and standardized procedures. Investigators rely heavily on email, Excel spreadsheets, and sometimes physical notebooks because of the lack of a modern centralized case management platform. CPRA does have a database, but it was reportedly compromised during the February 2023 ransomware attack on the City and it has not been fully reintegrated into the investigative process. Numerous CPRA staff members noted challenges with using the database, however, which was referred to as “outdated” and “unworkable for investigative purposes.” Unsurprisingly, because there was no functional database, obtaining data from CPRA for this project was challenging.

Prior iterations of CPRA leadership reportedly used the database in different ways (or not at all), and the staff we interviewed who used the database found it largely unhelpful. The prior CPRA Executive Director noted CPRA’s technology issues and was attempting to create a case management system using an outside vendor, but that contract was terminated due to the City’s financial circumstances.

CPRA’s Interim Director has required staff to use the existing database as of April 2025.

**Clearer Onboarding and Supervision:** CPRA staff consistently wanted more formalized onboarding for new employees, training, and more robust supervision. A recurring concern was that one supervisor (who for a period of time during this project was part time) was woefully insufficient to supervise all of the intake technicians and investigators.

### 3. The Commission and Discipline

The Oakland City Charter establishes a shared and interdependent disciplinary framework among the CPRA, the Chief of Police, and the Commission.



Section 604(g) of the Charter requires that, for any public complaint alleging misconduct that is investigated by both CPRA and OPD, the existence of agreement or disagreement regarding the investigative findings must be established by the Chief of Police and the CPRA Executive Director prior to any disciplinary adjudication.

In cases where CPRA sustains a finding and recommends discipline, but the Chief of Police disagrees with the proposed disciplinary action, either by disputing the finding or proposing a penalty outside of the recommended disciplinary range, the matter is elevated to a Discipline Committee.<sup>52</sup>

The Discipline Committee has the authority to issue a final determination regarding the appropriate discipline to be imposed. In such cases, CPRA serves not only as the investigative body but also as a contributor to the evidentiary record on which the Committee will rely. Some OPD interviewees raised concerns that the Discipline Committees overwhelmingly supported CPRA's higher disciplinary recommendation.

This shared model emphasizes the need for CPRA to be organizationally and administratively equipped to meet its obligations within the disciplinary framework.

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52. OMC Section 2.45.130. The OMC notes that the Discipline Committee, comprised of three Commission members, "decide[s] any dispute between the Agency and the Chief regarding the proposed or final findings or proposed or final level of discipline to be imposed on a subject officer."

## Findings and Recommendations

The City of Oakland has an opportunity to create a path-breaking structure for investigating police misconduct cases—one that balances independence, accountability, and operational feasibility. Given the challenges of Oakland’s fiscal situation and the ongoing oversight pursuant to the Negotiated Settlement Agreement (NSA), any structural shifts should proceed in carefully sequenced phases, each tied to clear benchmarks.

The recommendations outlined in this report contemplate foundational investments in CPRA staffing and systems, consistent coordination with OPD and the City Attorney’s Office, and interim procedural reforms such as the phased transfer of certain complaints. Collectively, these steps are designed to strengthen investigative integrity while ensuring that the City can deliver on its promise of fair, effective, and community-supported independent oversight.

This transition should occur in phases to test procedures and CPRA’s ability to meet case deadlines. The City should create a working group of stakeholders to assess next steps and course correct on issues that arise. We strongly agree with the observations of both CPRA and OPD interviewees that any process would have to be tested with a smaller subset of cases to work out processes.

### Phase 1: Fully Staff CPRA and Eliminate Parallel Investigations

The first step before any transfer should occur is to fully staff CPRA to its budgeted allocation, with additional administrative support. This budget will need to increase as Phase 1 is completed and the City looks to remove DLIs from OPD. However, there are numerous current vacancies at CPRA that will take time to fill. Longer term, staffing CPRA should create cost efficiencies, as outlined below.

The current dual investigative agency system means that two agencies are conducting parallel investigations—including simultaneously reviewing and analyzing documents and BWC footage; interviewing complainants, witnesses, and subject officers; and writing separate reports—for the same administrative complaint. Both agencies can also present or attend the Force Review Board or Executive Force Review Board, and present to the Chief of Police at the conclusion of administrative investigations. Reportedly, in the cases where both IAB and CPRA investigate, the two agencies have agreed on investigative findings in the majority of them.

A starting point is to have CPRA be the only agency to investigate Charter-mandated and other cases that it is already investigating. This would amount to more than 100 cases per fiscal year, based on CPRA current docket. Those cases already include many resource-intensive cases such as officer-involved shootings and other serious force cases that both agencies are currently required to investigate. This approach would allow IAB Investigations and some DLIs to be gradually reduced while freeing up some officers to return to other non-duplicative OPD functions. A back of the napkin estimate done by an OPD official indicated that having only CPRA investigate the cases it currently has on its docket could eventually free up approximately 3 to 5 sworn officers.

Additionally, methodically reducing IAB’s staffing and shifting certain resources over to CPRA— particularly civilian administrative support—could create greater long-term efficiency to avoid dual intakes of the same complaint and double-tracking efforts to obtain records and documents. It could also reduce confusion for complainants who might not understand why they are being contacted by multiple agencies.

An additional cost saving layer would be to civilianize some intake and other functions while this transition is occurring. IAB uses sworn officers for administrative and intake positions at IAB, but civilians can fulfill many of those administrative and intake job duties. As outlined in the chart below, the potential cost savings by having civilian staff instead of sworn officers perform administrative and intake functions could be approximately \$160,000 per position.

The chart below based on the City's proposed budget indicates the differences in salaries and benefits between somewhat comparable positions. It is excerpted from the City's projected budget information, which is included as Attachment A at the end of the report.

	<b>Total IAD Budget FY 25-26</b>	<b>Total CPRA Budget FY 25-26</b>	
Total Division/Agency Budget	\$10,249,660	\$5,140,133	
<b>IAD vs CPRA Comparable Position (number of staff based on projected budget)</b>	<b>IAD<sup>53</sup> Total Employee Compensation</b>	<b>CPRA Total Employee Compensation</b>	<b>Potential Cost Savings Per Position</b>
Deputy Chief (1) / Executive Director (1)	\$557,002	\$402,650	\$154,352
Captain (1)/CPRA Attorney (1)	\$474,512	\$371,752	\$102,760
IAD Lieutenant (3)/CPRA Investigator III (1)	\$433,966	\$253,250	\$180,716
Sergeant (14)/CPRA Investigator II (8)	\$322,954	\$217,326	\$105,628
Police Officer (4)/Civilian Intake & Admin	\$322,954	\$162,184	\$160,770

These salary differences are not a one-for-one replacement in terms of cost savings. The OPD employees in IAB would not fall off the OPD side of the ledger; they would eventually be transitioned into other duties within OPD. But as more positions are shifted to CPRA over time, and as civilians take over other positions, it would presumably reduce IAB's role in OPD's budget and in the City's overall costs. If most of IAB's positions were civilianized, the cost differential would exceed \$1 million before including overtime pay.

Before CPRA can assume sole responsibility for cases, however, it needs appropriate staffing.

53. These figures reflect data from the City's proposed budget figures for 2025-26. Many of the figures for ranked positions at OPD vary, presumably because salaries differ based on years of service. We selected a number in the middle if the budget included multiple positions included. Accordingly, those figures could be somewhat higher or lower if other figures were selected.





### **Recommendation 1: Hire Permanent CPRA Executive Director**

CPRA has cycled through five permanent or interim Executive Directors over the past three and a half years. The Executive Director with whom the consultants initially worked resigned during the pendency of this project. Numerous interviewees from IAB and CPRA noted the challenges caused by leadership shifts at CPRA, including the inherent changes in direction when new leadership comes aboard. Each leadership change initiates a new recruitment process and can result in periods of stagnation and/or rebuilding. This recurring cycle of transition and upheaval has prevented the agency from establishing a long-term strategic direction, hampered morale, and contributed to a lack of consistency in investigative approaches and internal expectations.

In addition, as of the date of this report, the CPRA has reduced investigative staffing and one contract Investigator III (supervisory role) due to budget challenges. This minimal number of investigative staff falls below the Oakland Charter's mandate that there be one CPRA investigator per 100 Oakland police officers. OPD has approximately 678 officers in its ranks during Fiscal Year 2025.<sup>54</sup> In addition, CPRA is not in compliance with the Charter's requirement that it have an investigator who is an attorney. Because it is so understaffed, CPRA cannot presently absorb functions from IAB.

Therefore, increasing CPRA's investigative and administrative personnel numbers must be a priority. Under the current proposed budget, CPRA is allotted seven full-time investigators. An incoming Executive Director will need to hire investigators as the budget allows before any meaningful transition can commence. Hiring at least one investigator with experience as a prosecutor, public defender or as a civil

54. <https://oaklandca.nextrequest.com/documents/4478739955>.

litigator used to interfacing with law enforcement officers in a professional setting would help buttress CPRA's investigative needs.

One frustration we heard from CPRA was the lengthy process associated with Oakland's civil service recruitment process that has reportedly slowed hiring for new employees. This process should be made as efficient as possible considering potential future cost savings.

### **Recommendation 2: Create a Transition Working Group**

The impacted agencies and other necessary parties should create a working group to create concrete timelines with transitional steps. At minimum, representatives from CPRA, OPD, the Commission, and OCA should be involved and in constant communication with the Monitoring Team, the City Administrator's office, community stakeholders, and the Mayor's office. Constant communication and cooperation will be imperative to ensure that the process is workable and to course correct as issues will invariably arise.

This working group should address the civilianization of IAB to the extent that entity continues to exist following any transition. The working group should also address budgetary and overtime issues within OPD and CPRA.

### **Recommendation 3: Increase CPRA Supervisory Staff**

The current budget only has one Investigator III (supervisory) position to oversee all the investigative and intake staff. Numerous CPRA employees we interviewed noted that the lack of supervision was a significant issue on both the intake and investigative sides, both in terms of receiving timely guidance on how to proceed with intakes or investigations, and in terms of receiving timely feedback on investigative reports. Our interviews and review highlighted that one investigative supervisor is inadequate for an agency charged with leading sensitive investigations.

CPRA should have *a minimum* of two supervisory investigators—one to supervise intake and one to supervise the investigators. IAB has a much higher supervisor-to-investigator ratio – with three Lieutenants who respectively monitor Intake, Investigations, and DLIs. Allotting CPRA more supervisory resources allows for more timely intervention, on-the-job training, second chairing interviews, and more levels of review for cases as appropriate.

### **Recommendation 4: Increase Administrative Support**

The CPRA has only one administrative assistant budgeted for its staff, and the proposed budget seeks to remove a second administrative assistant position incorporated in prior budget years. Virtually every CPRA staff member we interviewed noted that the administrative support was insufficient and slowed the overall agency operations.

Civilian staff at IAB's Intake and Administrative sections are already well versed in working on matters within CPRA's jurisdiction. As IAB is reduced in size, one possibility, where appropriate, is to reassign or hire those administrative support persons to CPRA.

If the City wishes to more quickly reassign some sworn officers doing administrative work out of those positions, perhaps OPD and CPRA could jointly interview and hire for those administrative slots in IAB as





CPRA prepares to assume sole responsibility for mandated cases. As the transition progresses, those civilians could then transfer from IAB to CPRA.<sup>55</sup>

CPRA will also need to fill its analyst roles and ensure it has the staff to report appropriate data to the Commission, OPD, and other stakeholders. CPRA's need for data analysts also ties into the following recommendation.

### **Recommendation 5: Establish an Improved CPRA Database**

CPRA should explore whether its case management and data capabilities are adequate to handle a transition. As noted above, CPRA, at the time the consultants reviewed CPRA's processes in Fall 2024, was utilizing a mix of email, Excel spreadsheets, handwritten logs, and inconsistent use of its database to memorialize its work and for data collection. Before submitting this report, we were informed that CPRA had reinstituted the use of its database.

If CPRA's current database proves unworkable, one possible database solution is for CPRA to transition to Vision, which is IAB's and OPD's current system. Vision is currently the only functional investigative case management platform in Oakland that tracks misconduct cases. Vision also houses OPD's human resource and performance data. CPRA recently explored creating its own replacement proprietary database, but that endeavor was terminated due to the City's fiscal situation. Given that there is no clear alternative currently, Vision appears to be the most viable option.

<sup>55</sup> We recognize that Oakland's civil service hiring rules may require additional steps or more complex processes that might make this recommendation less feasible.



Using an existing system such as Vision offers potential benefits. It includes a better reporting function on case deadlines and timelines. It offers a centralized place to find case information and incorporates tools such as an investigator chronology built into its user interface. It has been tested under the NSA's task requirements. It is already paid for. Additionally, adoption of the Vision system by CPRA during transitional phases would support continuity of case management processes and will allow for direct data comparisons to better evaluate the efficacy of any transfer of duties and responsibilities.

Expanding Vision for the CPRA is an imperfect solution. Vision lacks certain capabilities, such as sending push notifications and syncing with a calendaring system and may not currently capture all data that the CPRA must report. The prior CPRA Executive Director had full access to Vision. Other CPRA staff have more limited access, but it is seldom, if ever, used. Accordingly, if this option is pursued, CPRA staff will need to be trained on using Vision with the expectation that it is consistently utilized.

Perhaps most critically, strong firewalls would need to be instituted to ensure that the CPRA's work is confidential and protected, both to protect investigative integrity and to ensure public trust that only authorized users have access to the details of the independent investigation materials. These firewalls exist within OPD to protect IAB's work product from unauthorized access; similar or stronger firewalls will need to protect CPRA's work as well and should include an auditing function to track user access to the database and its contents

To make the necessary changes to Vision to bring CPRA into the fold, the consultants were informed that a handful of persons in City IT understand the platform. Those persons would need to be consulted as part of this process if City stakeholders decide to proceed down this path. This could also be an opportunity to update and improve Vision based on OPD's input on working with the system.

This transition will likely require staff time to import data and cases from CPRA. There may be costs associated with updating Vision to incorporate CPRA's work. The time involved in creating or transferring into a new case management platform should be discussed by the transition working group early in the process.

Regardless of platform, CPRA must at minimum standardize its case management practices. If CPRA's database that was in use prior to the last permanent Director's arrival proves functional, then that database should be tested to see if it can properly accommodate a transition.

### **Recommendation 6: Amend Oakland's Municipal Code, OPD's Manual of Rules, and Potentially the NSA As Needed.**

Because these recommended changes differ from the current processes Oakland has established for addressing investigations of alleged officer-involved misconduct, it will require updating the OMC, OPD's MOR, and potentially the NSA. For example, the OMC currently contemplates a system of two agencies investigating misconduct cases. The OMC would need to be modified to recognize CPRA as the lead investigative agency on Charter-mandated cases.

Some of these changes may also trigger collective bargaining issues. The City Attorney's Office should be part of the working group to advise on what legal issues may arise during the transition process. Finally, this process will require discussion with plaintiffs' counsel from *Allen* and the Monitoring Team regarding these potential changes to IAB's responsibilities.

## **Recommendation 7: Continue to Address Gaps in CPRA Policies and Procedures**

As the CPRA moves toward assuming sole responsibility for mandated allegations, the next leadership team should continue to standardize CPRA's investigative procedures, some of which the City Auditor previously noted. These suggestions include:

An onboarding for new investigators specific to civilian oversight and police misconduct investigations. Topics should include effective questioning of complainants, witnesses and subjects, securing evidence, and documenting investigative steps.

- Having a standardized investigations and intake manual. Numerous staff indicated that there were different materials prepared by different CPRA leaders), and a lack of clarity on which to follow. The CPRA should standardize these materials so that staff understand how to properly meet expectations.
- Completing the policies and procedures manual. A draft manual was in progress and under review shortly before this consulting project was initially paused. The manual should be updated as the initial transitional steps become clear and further updated as the transition develops. A clear, useful manual would assist both internal staff and external stakeholders in understanding how the CPRA's processes work.
- Using standardized closing reports. There was movement toward standardizing the CPRA's closing reports of investigations prior to this project being paused. This process of having standard report templates should also be completed and implemented if it has not yet occurred. If CPRA assumes the sole responsibility for conducting investigations into officer-involved alleged misconduct, then it will be critical for CPRA to consistently and accurately communicate about the evidence evaluated, CPRA's analysis of it, and the investigative steps that lead to that analysis. This is especially vital in cases where allegations are substantiated so that the evidence and MOR violations are clearly communicated to the Chief of Police, the Commission, and OCA.
- Ensuring CPRA's independence in investigative findings. CPRA's investigations must be completed with appropriate levels of confidentiality and lack of interference from other agencies or persons to reach complete and objective investigative conclusions.

With a clear leadership team, adequate staffing, and independence, CPRA should be able to establish these processes within a reasonable period.

## **Recommendation 8: Ensure CPRA Complies with Timelines**

When the prior Executive Director assumed that position in 2023, CPRA was facing numerous lapses on 3304 deadlines. The agency proceeded to focus on clearing cases that were nearing or had surpassed statutory deadlines. It is unclear whether CPRA will again have to triage cases to avoid missing the 3304 deadlines in light of recent budget cuts, but if so, those dated cases will need to be completed in advance of a transition. Otherwise, CPRA would be facing a crisis in meeting deadlines even before it assumes greater responsibility.



There should be clear benchmarks as CPRA staff members take sole responsibility of Charter-mandated and other cases assigned to it from the Commission. In our view, meeting 3304 deadlines should be a minimal threshold before an expansion commences.

### **Recommendation 9: Selecting Pilot Cases**

These internal issues—hiring and training investigators, preparing set procedures, and expanding Vision pr another database—are achievable benchmarks.

As CPRA nears meeting these benchmarks, the CPRA Executive Director should evaluate the CPRA docket and its staffing levels and capabilities. The Executive Director should select a test docket of cases and confer closely with IAB and the Commission in determining which cases CPRA will have sole responsibility for investigating. This initial set of cases should be ones without pressing 3304 or 180-day issues. This will allow CPRA to build on processes and work through issues with OPD, the Commission, and OCA. Another benefit of this selection process is that it requires constant communication between the agencies to ensure that appropriate deadlines are being met.

### **Phase Two: Expanding CPRA's Investigative Capabilities**

Once Phase 1 is completed, CPRA should assume sole investigative jurisdiction over all Charter-mandated cases and other cases that the Commission designates it to investigate. The working group should determine what achievable timelines and benchmarks for expanding CPRA look like once it is fully staffed. As CPRA assumes sole authority for Charter-mandated cases, it will need appropriate support from OPD and the Commission to obtain evidence, receive transitional support and input, and work through protocols.

### **Recommendation 1: Address Critical Incident Callouts**

To ensure timely initiation of critical incident investigations, such as officer-involved shootings or in-custody deaths, stakeholders should consider establishing a formal protocol for CPRA participation as it assumes responsibility for these cases.

The former CPRA Executive Director previously responded to such incidents. This practice should continue for the short term. As CPRA assumes sole responsibility for Charter-mandated cases, OPD and CPRA should work through clear protocols for CPRA staff to receive OPD-escorted walkthroughs of secured scenes of incidents and to ensure that criminal and administrative investigators are appropriately firewalled.

Incorporating CPRA into these responses would promote transparency, investigative integrity and quality, and would align with public expectations for independent oversight. Because many critical incidents occur outside of ordinary CPRA working hours, putting CPRA investigators on call may raise collective bargaining questions. IAB's investigators receive on-call pay and a take-home vehicle as part of their on-call duties.

COPA in Chicago transferred non-criminal responsibility for these cases to civilian hands, and stakeholders in Chicago may be worth contacting.

## **Recommendation 2: Ensure CPRA's Timely Access to Evidence and Records & Establish a CPRA-OPD Liaison**

As CPRA gains additional staffing and responsibility and IAB reduces in size, there will need to be clear channels for obtaining access to records and evidence. Under OMC section 2.45.080(B), CPRA is required to have access to OPD's records. Currently, CPRA has direct access to BWC footage and works with IAB to obtain other evidence. To the extent legally permissible, all CPRA investigators and supervisors should have direct access to OPD evidence and records to ensure timely and independent investigations rather than working through an intermediary. Creating unnecessary layers can slow investigative processes and create administrative barriers. For example, some civilian-led oversight agencies, including the local BART Office of the Independent Police Auditor, have direct access to platforms such as the police department's web-based records management systems, officers' disciplinary history, and computer-aided dispatch (CAD) entries.

The ability to review and collect relevant video evidence early in the investigative process also allows for more accurate identification of all potential misconduct allegations at the outset. Direct access to evidence significantly improves the likelihood of meeting investigative deadlines, whether self-imposed or required by law.

Within OPD, CPRA investigators reported a lack of cooperation from the Criminal Investigation Division, with some resistance reportedly stemming from uncertainty about *Garrity*<sup>56</sup> protections and the legal implications of open communication with CPRA. This can be resolved in two ways. First, the administrative statute of limitations may be tolled if there is a criminal investigation into the same conduct that CPRA is investigating. Second, concerns about an officer's Due Process rights under *Garrity* flow only in one direction. The criminal section does not generate compelled statements from the subjects of misconduct investigations; only the administrative section compels statements that require an officer to answer the investigator's questions. Accordingly, this does not limit the flow of information from the criminal side to the administrative side. Without clear protocols or assurances from OPD Command staff, investigative information to CPRA may remain limited.

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56. *Garrity v. New Jersey*, 385 U.S. 493 (1967). *Garrity* held that police officers cannot have compelled administrative statements that were obtained by a potential sanction of a loss of employment used against them in criminal proceedings. To utilize compelled statements in criminal proceeds would violate the officer's 5th Amendment rights.

Of course, there are certain records that CPRA will need assistance from OPD to obtain, such as warrants, the Crime Record Information Management System (CRIMS), and certain other law enforcement records. CPRA has limited access to certain databases (such as the California Law Enforcement Telecom System (CLETS)). To support interagency coordination during and after the transition of investigative duties, OPD should designate a dedicated CPRA Liaison. This liaison could serve as a key point of contact for CPRA, ensuring timely access to records, facilitating communication with OPD personnel, and supporting case coordination, including with Criminal Investigations (CI) when applicable. Establishing this role could help streamline operations, reduce delays in evidence sharing, and strengthen cooperation and trust between agencies.

### **Recommendation 3: Address Staffing at Internal Affairs**

A transfer of cases would allow the caseload for IAB Investigations and DLIs to decrease, but it would not entirely disband IAB.

For example, the IAB DLI process, where the greatest quantity of misconduct cases are addressed within OPD, would continue during the initial phases of any transition unless it was a mandated case. Longer term, the goal would be for CPRA to take over DLIs, a step that has the support of multiple OPD leaders we interviewed. If DLI's could largely be removed from OPD's purview, that would free up IAB DLI to return to other law enforcement functions and relieve field sergeants of the burden of investigating hundreds of cases per year. In 2024 alone, OPD reportedly completed 764 DLIs.

For the more immediate future, if CPRA is already conducting a misconduct investigation, it would reduce some duplication and free up the bandwidth of field supervisors. The working group will need to quantify the additional individual or collective bandwidth and availability due to the varying levels of complexity of each misconduct investigation and each sergeant's daily workload.

Similarly, IAB's Intake and Administrative Units will need to exist in some capacity moving forward. Although some duplication could be reduced by moving civilian intake and administrative support from OPD to CPRA, IAB Intake and Admin would still need to prepare a high volume of cases during the transition.

In addition, some of IAB's functions would have to continue, either remaining at IAB or moving to the Bureau of Risk Management. In the case of administrative disciplinary work, much of that should eventually be transferred to CPRA. An example of other functions include:

- SB2: This function would remain at OPD, as the relevant Penal Code section requires that the employing agency update POST on misconduct issues.
- *Brady* and *Pitchess* responsibilities: CPRA will need to ensure that it is providing appropriate *Brady* and *Giglio* information to OPD. CPRA is not part of the criminal prosecution team; that reporting responsibility to provide exculpatory evidence should flow through OPD. The City should confer with OCA to determine the best path for addressing this issue. *Pitchess* deals with OPD employee personnel issues in litigation and should also remain within OPD.
- OPD will need to be involved in physically serving discipline and placing an officer on administrative leave (e.g. recovering Department-issued firearms).



- IAB Integrity Testing: these administrative “stings” should remain in OPD.
- Preparing disciplinary packets: CPRA should assume this responsibility in Phase 2 as it builds its administrative staff.

### **Phase 3: Transferring Discipline Functions and DLIs to CPRA**

#### **Recommendation 1: Fully Civilianize Misconduct Investigations including DLIs**

While the long-term objective of fully civilianizing the misconduct investigation process remains an overarching target, transferring DLIs from OPD to CPRA presents significant operational and fiscal challenges. DLIs constitute a substantial portion of the overall misconduct caseload and shifting them to CPRA would considerably increase the agency’s investigative workload.

Given the City’s ongoing financial constraints and CPRA’s current staffing limitations, the volume of DLI cases raise immediate feasibility concerns, without regard for the complexity of any given complaint investigation. Although there appears to be consensus among various stakeholders that DLIs should eventually be removed from OPD’s purview to allow OPD sergeants to commit more time to public safety-related tasks, the City should first ensure that CPRA can successfully implement the foundational elements of Phases 1 and 2 before moving toward this additional expansion.

This approach may better enable the agency to build the necessary investigative capacity, supervisory infrastructure, and procedural consistency required to absorb the additional DLI-related duties. After CPRA has demonstrated measurable success under the earlier phases and secured adequate staffing levels and training processes the City and CPRA leadership should evaluate the full reassignment of DLI responsibilities.

OPD reportedly totalled more than 700 DLI cases in 2024. These cases, on average, should take fewer investigative hours than IAB’s cases, but CPRA would need to increase its investigator FTE dramatically to handle this case load. Presuming approximately 30 hours of work per DLI case, that would equal 9000 hours of work per year, not including administrative, meeting, or potential discipline-phase time.

Some CPRA and OPD staff suggested using a better triaging method for lower-level complaints rather than requiring full written reports for every case. The NSA does not make distinctions between how lower level versus serious cases are investigated.

#### **Recommendation 2: Consider Reforming CPRA Intake Process**

The current CPRA model of conducting intakes, which function as preliminary investigations, sometimes takes months to complete before being assigned to an investigator. This period could be shortened substantially by using investigators earlier in the process and by having the intake process be a largely administrative role. The intake process can begin with an initial collection of basic information, a summary of the nature of the misconduct allegations, a request for documents from OPD, and a preliminary review of the relevant BWC footage. These things can then be flagged for a supervisor. More serious cases involving ephemeral evidence, such as physical injuries requiring more immediate attention, should be flagged and sent for investigation immediately. This way, trained investigators can quickly go to the scene to canvass for witnesses and evidence.



CPRA will also need to develop a process for receiving complaints from the Communications Division, which logs all complaints received when IAB is unavailable.

### **Recommendation 3: Transfer Administrative Discipline Responsibilities to CPRA**

CPRA must be sufficiently staffed and equipped to handle the additional workload associated with notification of discipline<sup>57</sup>, *Skelly* hearings, disciplinary committee reviews, and arbitration proceedings. The IAB currently employs personnel dedicated to redacting records, preparing *Skelly* documents, and serving as liaisons to the City Attorney's Office. CPRA lacks comparable administrative and logistical support. To fulfill these functions effectively, CPRA would need to expand its capacity by employing administrative staff responsible for managing these processes.

OPD has struggled with a significant backlog of *Skelly* hearings.<sup>58</sup> To the extent that the lack of hearing officers has played a role, CPRA and OPD should explore having non-OPD hearing officers handle them.

Moreover, CPRA should develop a structured internal process to coordinate with the City Attorney's Office, ensure the legal sufficiency of documentation, and maintain procedural timelines. This may require establishing designated roles focused exclusively or primarily on supporting disciplinary case progression after findings are issued. Absent sufficient staffing, the process could overburden CPRA, delaying or otherwise undermining the efficacy of the intended disciplinary process. Eventually, CPRA's attorneys may be able to handle some of the disciplinary proceedings such as arbitrations.

Technology upgrades will also be essential in this area. CPRA must implement systems that allow for secure, trackable workflows and document management, and provide real-time visibility into the status of *Skelly* responses, scheduling, and the tracking of final disciplinary outcomes. Effective case tracking and documentation are especially important in the event of challenges brought by employee representatives or external reviewers such as the Independent Monitor.

Finally, to match the procedural support currently in place at IAB, CPRA will need to establish clear protocols and lines of responsibility for handling *Skelly*-related materials. This includes redaction standards, coordination of mechanisms for document delivery, and staff who can serve as consistent points of contact with OPD, the City Attorney, and any relevant third parties. Without this infrastructure, CPRA could risk missing deadlines, end up producing incomplete or inadmissible records, or failing to uphold due process requirements. Each of these results could lead to disciplinary outcomes being overturned or otherwise invalidated.

### **Recommendation 4: Transfer DLIs to CPRA Immediately Following Initial Field Interview or Contact by Field Sergeant**

The City should implement a procedural shift in the handling of DLIs. Field sergeants are required to respond to the scene or speak to a complainant within three hours under NSA Task 5.1. When CPRA has

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57. IAB's Pre-Discipline process requires the following: "Upon approval of a sustained finding in an internal investigation, unless the Chief has waived the process, the IAB shall provide a printed copy of the subject's five (5) year disciplinary history, his/her two most recent performance evaluations, the Complaint Investigation Report (CIR) and the Report of Investigation (ROI) for the current case. The documents shall be forwarded to the sustained member's Captain." IAB Manual at 57.

58. <https://www.sfchronicle.com/bayarea/article/oakland-police-discipline-backlog-19499706.php>

the appropriate staffing, OPD sergeants could complete only an initial field interview with complainants and then promptly transfer the case to CPRA for further handling and investigation. This approach would maintain continuity in the initial response and documentation of allegations while enabling the CPRA to assume responsibility for case development, documentation, and investigation. Delegating only the initial intake to OPD supervisors preserves the continuity of complaint processing while relieving sergeants from the burdens of some administrative tasks. It would also establish a clear procedural division between first-responder duties and investigative oversight, thereby aligning with any efforts to ultimately fully civilianize misconduct investigations. For this transition to be effective, protocols for handoff, evidence transfer, and timeline tracking will need to be clearly established and jointly managed by OPD and CPRA leadership.

### **Recommendation 5: Non-Sworn Employees**

CPRA lacks the legal authority to investigate allegations of misconduct involving non-sworn OPD personnel, such as dispatchers. As a result, such cases must either remain within the purview of OPD or be reassigned to the City's Employment Investigations and Civil Rights Compliance unit. Given OPD's size relative to other City departments and agencies, we recognize that this is not a minor shift and may raise a number of logistical and legal issues. The receiving agency will need to hire staff to handle that additional case load.

In the interim, the City should establish and communicate a clear and enforceable division of investigative responsibilities across departments to prevent oversight gaps, and to ensure consistent handling of complaints involving all categories of OPD personnel.

## Conclusion

This report has explored whether some of IAB's responsibilities can be effectively transferred to the CPRA. While the overarching goal of fully civilianizing misconduct investigations reflects the values of transparency and accountability sought by Oakland and its residents, it must be pursued with strategic care.

The City is currently navigating severe fiscal constraints, and CPRA continues to contend with staffing limitations, leadership transitions, and operational backlogs. These realities require the City to approach any expansion of CPRA's duties via a measured and thoughtful plan. If Oakland can successfully accomplish exclusive civilian oversight, it could become a national leader and be one of the very few to embark on this path.

The recommended three-phase transition framework offers a preliminary roadmap. Beginning with the transfer of certain Level I complaints and gradually increasing CPRA's scope over time, this approach allows for necessary investments in CPRA's investigative staffing, internal systems, and interdepartmental coordination. Success must be evaluated at each stage, not only in terms of caseload metrics, but also in the consistency, fairness, and integrity of outcomes to all parties. At the heart of this work is a shared commitment to building a public safety system that earns and sustains the trust of the community and all stakeholders.

**Attachment A**

<b>Bureau</b>	<b>Job</b>	<b>FTE</b>	<b>Amount</b>	<b>Position Type</b>	<b>Year</b>
Internal Affairs Bureau	Captain of Police (PERS).PS107	1	474512	Sworn Staffing	2026
Internal Affairs Bureau	Deputy Chief of Police (PERS). EM135	1	557002	Sworn Staffing	2026
Internal Affairs Bureau	Intake Technician.AP434	1	155695	Professional Staffing	2026
Internal Affairs Bureau	Intake Technician.AP434	1	158741	Professional Staffing	2026
Internal Affairs Bureau	Intake Technician.AP434	1	155695	Professional Staffing	2026
Internal Affairs Bureau	Intake Technician.AP434	1	155695	Professional Staffing	2026
Internal Affairs Bureau	Intake Technician.AP434	1	155695	Professional Staffing	2026
Internal Affairs Bureau	Intake Technician.AP434	1	155695	Professional Staffing	2026
Internal Affairs Bureau	Lieutenant of Police (PERS) (80 Hr). PS152	1	454221	Sworn Staffing	2026
Internal Affairs Bureau	Lieutenant of Police (PERS) (80 Hr). PS152	1	433966	Sworn Staffing	2026
Internal Affairs Bureau	Lieutenant of Police (PERS) (80 Hr). PS152	1	389789	Sworn Staffing	2026
Internal Affairs Bureau	Police Officer (PERS) (80 Hr).PS168	1	322954	Sworn Staffing	2026
Internal Affairs Bureau	Police Officer (PERS) (80 Hr).PS168	1	337119	Sworn Staffing	2026
Internal Affairs Bureau	Police Officer (PERS) (80 Hr).PS168	1	306041	Sworn Staffing	2026
Internal Affairs Bureau	Police Officer (PERS) (80 Hr).PS168	1	303135	Sworn Staffing	2026
Internal Affairs Bureau	Police Records Specialist.SS165	1	120894	Professional Staffing	2026
Internal Affairs Bureau	Police Records Specialist.SS165	1	120894	Professional Staffing	2026
Internal Affairs Bureau	Police Records Supervisor.PS171	1	180612	Professional Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	386251	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	377369	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	389827	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	391806	Sworn Staffing	2026



Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	392650	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	381357	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	388755	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	356945	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	368547	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	347710	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	368991	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	380288	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	390734	Sworn Staffing	2026
Internal Affairs Bureau	Sergeant of Police (PERS) (80 Hr). PS179	1	390075	Sworn Staffing	2026

**CPRA**

Position Status	Position	Job	Fund	Org	Project	Program	FY26 FTE	FY26 Amount	FY27 FTE	FY27 Amount
Filled	PN_10027	Complaint Investigator II.AP146	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	217,326	1.00	215,761
Filled	PN_2056	Complaint Investigator II.AP146	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	217,326	1.00	215,761
Filled	PN_34865	Intake Technician. AP434	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	165,231	1.00	164,016
Filled	PN_34900	Executive Director CPRA. EM229	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	402,650	1.00	399,782
Filled	PN_35961	Complaint Investigator II.AP146	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	217,326	1.00	215,761
Filled	PN_37514	Intake Technician. AP434	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	162,184	1.00	161,016
Filled	PN_37515	Intake Technician. AP434	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	162,184	1.00	161,016
Filled	PN_40099	Complaint Investigator II.AP146	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	217,326	1.00	215,761
Filled	PN_40100	Complaint Investigator III. AP144	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	253,250	1.00	251,439
Filled	PN_43416	Project Manager II.EM211	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	354,047	1.00	351,500
Filled	PN_44872	CPRA Attorney. MA165	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	371,752	1.00	369,076
Filled	PN_45341	Administrative Analyst II.AP106	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	195,350	1.00	193,945
Filled	PN_45342	Complaint Investigator II.AP146	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	217,326	1.00	215,761
Filled	PN_48848	Crime Analyst. AP446	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	187,765	1.00	186,415
Filled	PN_48849	Crime Analyst. AP446	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	187,765	1.00	186,415
Filled	PN_48860	CPRA Attorney. MA165	FD_1010	OR_66211	PJ_1003737	PG_IP06	1.00	371,752	1.00	369,076