2012

Protect, Serve and Listen

accepting civilian complaints at Connecticut police departments

ACLU
AMERICAN CIVIL LIBERTIES UNION
of CONNECTICUT

Protect, Serve and Listen

accepting civilian complaints at Connecticut police departments

A report of the American Civil Liberties Union of Connecticut

Credits

The research for this report was conducted by Amy Breglio, Christopher Clark, Lindsay Compton, Anna Keegan, Lauren Masotta and other volunteers under the guidance and supervision of David McGuire. The report was compiled, written and edited by Jeanne Leblanc, David McGuire and Robert Schultz. Dr. Arthur N. Lubin helped develop the survey tool and analyze the collected data.

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I. Introduction

After fielding numerous reports about police departments refusing to accept civilians' complaints of police misconduct, the American Civil Liberties Union of Connecticut surveyed police agencies in the state about their complaint procedures. We discovered widespread resistance to accepting misconduct complaints.

The issue is critically important. Effective law enforcement depends on public trust in the police, which rests in large part on fair and transparent systems for handling civilian complaints of police misconduct. Professional law enforcement organizations, government agencies, civil rights advocates, academic researchers and the courts on every level have reached this conclusion in a slew of studies, reports and judicial opinions over the past several decades.

It's easy to identify the standards police departments should strive to meet. Law enforcement policy experts have established a consensus on many best practices to handle civilian complaints, reaching a broad agreement about practices and procedures that promote accountability, transparency and public trust. Such sources as the Commission on Accreditation for Law Enforcement Agencies, the International Association of Chiefs of Police and the Department of Justice have published generally accepted guidelines and recommendations that cover all phases of internal affairs investigations.

We focused our survey and this report on the crucial first steps — accepting complaints from civilians. Only after instituting clear and effective policies for accepting complaints can police agencies evaluate and address any deficiencies in how those complaints are subsequently investigated. This report ends with a set of recommendations for statewide standards on accepting complaints of police misconduct from civilians.

II. Executive Summary

This report from the ACLU of Connecticut identifies generally recognized policies and standards, as defined by relevant authorities, for accepting allegations from civilians about police misconduct and reviews the degree to which Connecticut's police agencies conform to them. Our findings:

- Several high-profile investigations and reports about Connecticut police agencies, including most recently the East Haven Police Department, have shown clear deficiencies in police procedures for handling complaints of police misconduct.

- Most Connecticut police departments impose barriers to accepting complaints, such as refusing anonymous and third-party complaints, in contravention of clear and widely accepted professional standards.

- Many Connecticut police departments set conditions known to discourage and intimidate legitimate complaints, including requirements for sworn statements, warnings of prosecution for false statements and threats of referrals to immigration authorities.

- Many police employees who responded to our telephone survey about civilian complaint procedures could not answer our questions, refused to answer our questions, provided inaccurate information or contradicted information from other employees.

Our study revealed a clear need to set standards for accepting civilians' complaints of police misconduct, and this report concludes with a set of recommendations that should be codified in state law. Statewide standards will not only protect civilians, they will protect the reputations of honest and hardworking officers and provide the structure for correcting mistakes made early in an officer's career. As the International Association of Chiefs of Police states, "a police department must monitor its officer[s'] mistakes and misconduct to protect its interests and reputation."[1] There is no reason for police departments to wait for legislation. They can begin to follow the recommendations immediately to benefit their communities, their departments and their officers.

III. Methodology

The ACLU of Connecticut conducted a telephone survey of 104 Connecticut law enforcement agencies to get basic information from police about how to file a complaint against an officer. We called the 92 municipal police departments required to report under the Alvin W. Penn Racial Profiling Prohibition Act and the 12 individual state police barracks. These criteria excluded some police agencies in small towns that are supervised by resident state troopers and staffed by local officers, as well as university police departments and some specialized agencies. The telephone survey was modeled after a survey previously completed by the ACLU of New Jersey. We conducted a pilot survey to measure the scope and effectiveness of the survey tool and made several changes afterward. Dr. Arthur N. Lubin, an adjunct professor at Roosevelt University and Oakton Community College and a Statistical Expert for the United States Environmental Protection Agency, helped develop the survey tool and analyzed the collected data.

Seven ACLU of Connecticut volunteers telephoned the police agencies' routine, non-emergency numbers during January and February 2012 from the ACLU of Connecticut office in Hartford during normal business hours. They asked 10 specific multi-part questions about the civilian complaint process. (The survey instrument is available in Appendix A.) Volunteers were trained to ask for details on how to file a complaint but never to suggest that a real incident happened and never to make up details about an alleged incident. Before they began surveying police agencies, the volunteers made practice calls within the office. The volunteers varied in gender, age and ethnic background. Several law enforcement agencies refused or were unable to answers questions on the first call. We instructed volunteers to give each agency one call back. There were six agencies from which we could not collect data because our volunteers were not able to obtain answers during the

two calls. Calls lasted an average of eight minutes and 19 seconds, ranging from just over a minute for a call where the respondent refused to answer questions to a call with a cooperative police employee that lasted 18 minutes. For more information about the complaint process, we also searched and analyzed the policies and complaint forms available on agencies' websites. (Copies are available at www.acluct.org/complaintforms)

This report is not intended to be a scientific and all-inclusive interpretation of police complaint practices in Connecticut. Instead, the report highlights how difficult it can be for Connecticut residents to file a complaint with their local law enforcement agencies and how challenging it can be to obtain even basic information about how to file a complaint. Likewise, the excerpted remarks from the respondents to our survey do not convey the attitudes of entire police departments but serve only to illustrate how a member of the public might be treated and to demonstrate some of the police practices – both good and bad – that our callers encountered. It became evident during our survey that the quality and content of each response was largely dependent on the employee who happened to answer the call. Yet in every instance the respondent was one whom any civilian might encounter when calling. (The responses of individual police agencies to key questions in the survey are presented in Appendix B.)

IV. Background on Civilian Complaints in Connecticut

In Connecticut, as elsewhere, several high-profile cases of police misconduct have aroused public concern. In addition, at least two municipal police departments and the Connecticut State Police have undergone particular scrutiny of their internal affairs operations in recent years. There is no reason to believe that the deficiencies found at these police agencies are peculiar to them, and indeed this study suggests many shortcomings are shared by other police departments.

Connecticut State Police

A 2006 report on the Connecticut State Police Internal Affairs Program by the New York State Police and the Connecticut Office of the Attorney General stated: "The Connecticut State Police makes it very difficult for a member of the public to register a personnel complaint against an employee"[2] and found a "pervasive view of citizen complaints as nuisances rather than legitimate concerns warranting internal affairs review."[3] The report also noted "[r]epeated efforts" during internal state police investigations "to discredit complainants and witnesses while, at the same time, giving the benefit of the doubt to self-serving, questionable statements by accused employees."[4]

Our survey, which included calls to all 12 state police barracks, indicates there is still room for improvement. Our questions were answered willingly at only five barracks. At six of the other seven, our callers encountered hostile or defensive respondents who refused to answer all or some of the questions. At the seventh, our volunteer could not reach anyone who would talk about the complaint process. Some of the responses at different barracks contradicted each other. For

example, three reported that they would not accept complaints from a third party, two said they would, four were unsure and three refused to answer the question.

Hartford Police Department

In 2011, a consultant's review of the Hartford Police Department Internal Affairs Division reported that "management oversight of the IAD was lax and at times nonexistent" and concluded that the department had ignored many recommendations in a 2008 report to improve the citizen complaint process and bring it into compliance with the settlement of a civil rights lawsuit reached nearly 40 years earlier.[5] Among the recommendations from 2008 were that the department: accept all complaints, whether made in person, by telephone, in a letter or anonymously; describe the steps to file a complaint on the Police Department website; and create a brochure describing how to complain about or commend an officer's conduct.[6]

Progress has been made. The brochure is now posted on the department's website[7] with complaint forms, in English and Spanish. It explains that complaints will be accepted in person, by mail, phone or email and states that anonymous complaints, although not recommended, will be investigated. Yet when we called the Hartford police, the respondent told our caller that the department would accept complaints in person only and would refuse anonymous complaints. It's worth noting that an earlier test call to the Hartford Police Department during our pilot survey elicited different answers from a different employee and that those answers were largely in line with the brochure and with accepted police practices. This type of disparity was also evident in test calls to other departments and shows that training may be inconsistent even where policies are good.

East Haven Police Department

After a lengthy investigation, the U.S. Department of Justice concluded in December 2011 that the East Haven Police Department engaged in biased policing and followed a "seriously deficient" complaint procedure that was "designed in a way that discourages community participation and especially participation by the Latino community."[8] Complaint forms were available only at police headquarters, were printed only in English despite the presence of a sizeable Latino community, contained "repeated admonitions regarding criminal liability for making false statements to police officers" and would not be accepted unless notarized by a police officer.[9] The police department changed these practices only after the Department of Justice advised the town of its concerns in 2010.[10] In October 2012, the Department of Justice announced a proposed consent decree with the East Haven Police Department that sets out extensive measures the department must take to ensure proper handling of civilian complaints.[11] Our investigation discovered that the practices condemned by the Department of Justice in East Haven persist at many other police departments throughout the state.

Federal investigators also expressed concern that East Haven police officers used immigration law "to harass and intimidate Latinos rather than pursue legitimate law enforcement objectives."[12] In January 2012, four East Haven police officers were arrested in a separate criminal investigation by

the Department of Justice and accused of racially profiling and abusing Latino people.[13] In our survey, the East Haven police employee who spoke to our caller couldn't tell us whether an illegal immigrant filing a complaint against a police officer would be reported to immigration authorities.

V. Best Practices

Over decades of study, a strong and broad consensus has emerged about best practices in handling civilian complaints of police misconduct. While informed by a wide variety of sources, our recommendations are drawn primarily from three of the most active and respected voices in law enforcement policy: the International Association of Chiefs of Police (IACP), the Commission on Accreditation for Law Enforcement Agencies (CALEA) and the Office of Community Oriented Policing Services (COPS) at the Department of Justice. Many of the same practices were also specifically recommended in a 2006 report issued by the New York State Police and the Connecticut Office of the Attorney General regarding the internal affairs practices of the Connecticut State Police,[14] and endorsed in recent policy revisions by the New Jersey Attorney General.[15]

These best practices can be broken down into four precepts. Police should:

- accept and investigate all complaints
- refrain from intimidating complainants
- make the complaint process accessible
- track all complaints

Accept and investigate all complaints

A manual of standards for police internal affairs from the Department of Justice puts it simply: "Each agency should require that every complaint from the public be received and evaluated to determine the nature of the agency's response to the complaint."[16] A report from the International Association of Chiefs of Police says the same: "A bright line rule, stating clearly that all agency employees will accept any and all complaints is the easiest to understand and teach other employees."[17] The Commission on Accreditation for Law Enforcement Agencies is particularly clear that anonymous complaints must be accepted, requiring a written policy that "all complaints against the agency or its employees be investigated, to include anonymous complaints."[18] The International Association of Chiefs of Police agrees: "It is highly recommended that anonymous complaints not only be accepted, but that the department's policy clearly say so."[19] The New Jersey Office of the Attorney General states: "All complaints of officer misconduct shall be accepted from all persons who wish to file a complaint regardless of the hour or day of the week. This includes reports from anonymous sources, juveniles and persons under arrest or in custody."[20] And the Department of Justice concurred in its proposed consent decree with the East Haven Police Department that "EHPD

"You can't complain because you didn't like an officer's attitude."
Southington Police Dept.

"Anyone can file a complaint."
Shelton Police Dept.

shall accept all misconduct complaints, including anonymous and third-party complaints, for review and investigation."[21]

These organizations agree that accepting all complaints – which may range from allegations of rudeness to claims of criminal conduct by an officer – means the agency must at least write them down so that its actions on the complaints may be reviewed.[22]

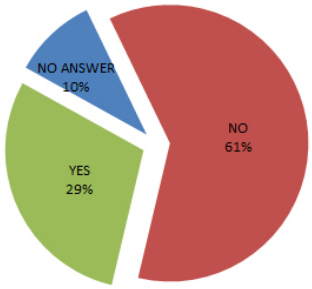
Yet our survey found that most police departments in Connecticut impose restrictions at intake, refusing to accept anonymous or third-party complaints, for example, or complaints from minors without a parent or guardian. Sixty-one percent of the municipal police agencies in Connecticut (excluding state police) told our callers they would not accept anonymous complaints, and another 10 percent could not or would not answer the question.[23] Only 29 percent clearly said they would accept anonymous complaints.

"An anonymous complaint will hold no weight."
Derby Police Dept.

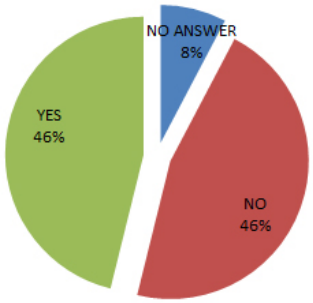
"The department's first concern is addressing the complaint, no matter who filed it."
East Hampton Police Dept.

The response from the 13 municipal agencies accredited by the Commission on Accreditation for Law Enforcement Agencies[24] was better, but fell short of what should be expected in view of the clearly stated accreditation requirements. Six of the accredited municipal agencies, or 46 percent, said they would not accept anonymous complaints, an equal number said they would accept them and one said it would depend on the nature of the complaint. The commission also accredits the Connecticut State Police, but of the 12 state police barracks, respondents at only five said they would accept anonymous complaints, two said they would not and five could not or would not answer the question.

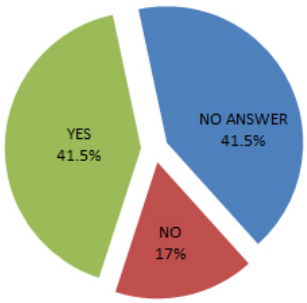
Q. Could a person make a complaint anonymously?



92 Municipal Agencies



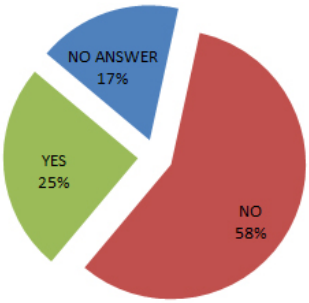
13 Accredited Municipal Agencies



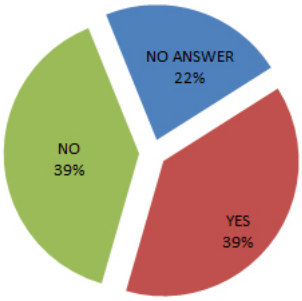
12 State Police Barracks

Another barrier to anonymous complaints was a requirement for the complainant to appear in person at the police station, cited by 58 percent of respondents from all 104 police agencies surveyed. The same percentage said they would refuse to accept a complaint through a third party and 39 percent said they wouldn't take a complaint from a minor without a parent or guardian present.

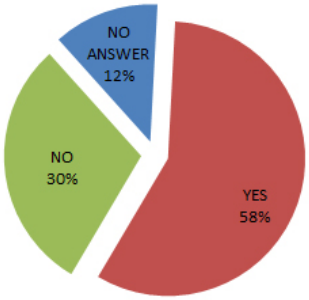
Q. Can a third party file a complaint for someone?



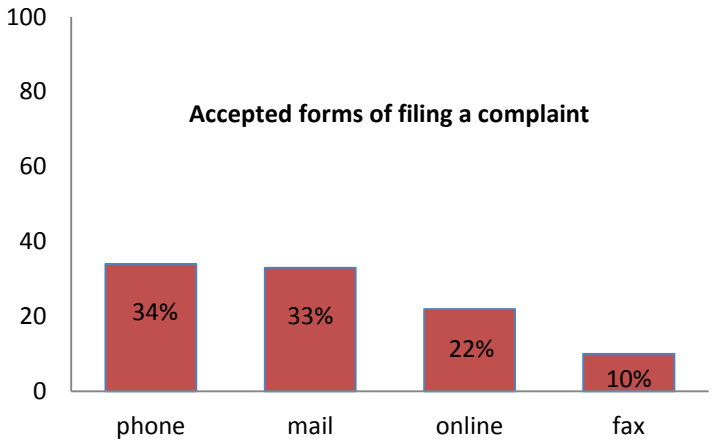
Q. Does it matter if the person filing the complaint is under 18?



Q. Does a complainant have to come into the police department?



"[A] police department wanting to portray an image of true responsiveness will accept complaints in any form – by phone, mail, in person, and today, by e-mail or web form," according to the International Association of Chiefs of Police.[25] Yet when asked how a person may file a complaint, 58 percent of departments reported a requirement to appear in person at the police station, as noted above. And when specifically asked about other means of filing a complaint, many responded that complaints would not be accepted online, by mail, phone or fax. The chart below shows the police agencies that responded with a clear "yes" when asked whether they would accept complaints by the means indicated.[26]



Additionally, a substantial number of departments imposed an arbitrary time limit as another barrier to filing a complaint. Some respondents to our survey said their departments require that complaints be filed in 30 or 60 days, and one, New London, within 10 days. While some complaints may become difficult to investigate after time and statutes of limitations might bar some criminal cases, there is no reason to refuse complaints at intake on this basis.

"[If the incident was] over a year ago, they'll tell you to walk right back out the front door."
Milford Police Dept.

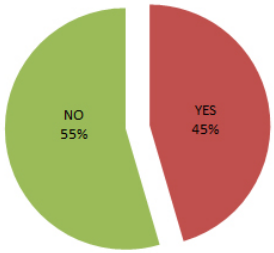
Refrain from intimidating complainants

Filing a complaint against a police officer can be daunting and many Connecticut police departments make it even more intimidating with policies that require sworn statements, threaten prosecution for false statements, warn of civil liabilities or expose complainants to the possibility of deportation. All these practices are widely discouraged by law enforcement policy experts.

"When a complaint is filed, the complainant's name is run through a computer." *Westport Police Dept.*

In its internal affairs standards, the Department of Justice states that "a complaint need not be under oath or penalty of perjury."[27] Following this standard, the New Jersey Office of the Attorney General insists that, "Under no circumstances shall it be necessary for a citizen to make a sworn statement to initiate the internal affairs process."[28] The International Association of Chiefs of Police notes that requiring notarization or a sworn statement "can [ensure] sincerity, but it can also discourage honest people who may be skeptical or reticent."[29] Additionally, a sworn statement may require a form of identification not available to undocumented immigrants, effectively shutting them out of the complaint process.

Online complaint forms with requirements for sworn statement or notarization.



Yet many Connecticut police departments require that a civilian filing a complaint make a sworn statement to a police officer or a notary public. Of the 22 municipal police departments in Connecticut that provide forms on the Web, 10 require a sworn statement or notarization. This requirement was also mentioned to our callers by several respondents at police departments that did not post forms online. At least one Connecticut police department not only requires a notarized statement but asks on its form whether the complainant is willing to submit to a polygraph examination.[30]

Threats of prosecution are also "a well-known deterrent to filing a complaint," according to the Department of Justice.[31] Civilians may infer that they will be prosecuted if their complaints are not sustained; they may not realize that proof beyond a reasonable doubt of an intentional lie would be required for a conviction on any criminal charges against them. The Department of Justice recommends in its internal affairs standards that "no threats or warnings of prosecution or potential prosecution for filing a false complaint should be made."[32] The International Association of Chiefs of Police concurs, stating that false complaints are "not a widespread problem in most localities" and warning of the "chilling effect" of pre-emptive threats of prosecution.[33]

Yet many Connecticut police departments threaten criminal prosecution for a false complaint, often citing state law above the signature line on the complaint form.[34] Nearly two thirds of the online complaint forms posted by municipal police departments in Connecticut contain such warnings, and in some cases they are repeated in explanatory material. For example, the Connecticut State Police

website warns civilians contemplating a complaint — twice on the page titled *Citizen's Guide To Making Commendations And Complaints*[35] and once on the *Compliment / Inquiry / Complaint Form*[36] itself — that they may face criminal prosecution for making a false complaint.

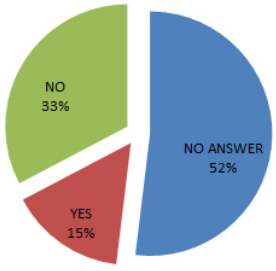
"False reporting in an attempt to unjustly subject a Connecticut State Trooper to undeserved discipline or slander, or place his/her employment in jeopardy, can result in criminal charges or civil liability." *Connecticut State Police website*

The state police *Citizen's Guide* also introduces the possibility of civil liability for false complaints, implying that if the department does not uphold the complaint, the complainant may be sued. But the Connecticut Supreme Court has ruled that filing a complaint against a police officer is no basis for defamation or a similar claim by the officer.[37] In so ruling, the Supreme Court explained that it sought to avoid the chilling effect that civil liability would create: "we conclude that the policy of encouraging citizen complaints against those people who wield extraordinary power within the community outweighs the need to protect the reputation of the police officer against whom the complaint is made."[38]

Threats of immigration action will deter those with illegal or uncertain immigration status from filing complaints against the police, which creates a class of people with little or no protection from abuse by law enforcement. The lack of a clear policy is enough to discourage complaints, which is why the Department of Justice declares that "running warrant or immigration checks on complainants at intake solely because they are complainants should not be tolerated."[39] The particular vulnerability of immigrant communities to police abuse is underscored by the arrests of four East Haven officers who were accused of using immigration law to target, harass and abuse Latino immigrants.[40]

Despite the East Haven example, the Department of Justice's standard does not prevail in Connecticut. Only a third of departments in our survey clearly stated that immigration authorities would not be called against a civilian complainant. More than half did not answer or expressed some degree of uncertainty, from "probably" to "probably not." One respondent said "You'd have to come in to find out." Respondents at 15 percent of the surveyed police agencies, including one state police barracks, said they would definitely report a complainant to immigration authorities. One respondent said police are legally obligated to report illegal immigrants and added that a complaint from an illegal immigrant against a police officer would be "like if a person came in and said I was breaking into this house and a cop was rude to me."

If an illegal immigrant wanted to file a complaint, would Immigration be called?



"[We would] take them into custody, call ICE [and] deport them."
Middletown Police Dept.

"It's our duty to report illegal immigrants."
Trumbull Police Dept.

"Are you illegal?"
New Britain Police Dept.

"Illegal immigrants still have the right to file complaints."
Torrington Police Dept.

"We have nothing to do with immigration law."
State Police, Troop C

"[Illegal immigrants] have the same rights as anyone else with regard to law enforcement."
Willimantic Police Dept.

Make the complaint process accessible

Adhering to the standards described above, such as allowing multiple means of filing a complaint, would bring many improvements. But additional steps should be taken to make the complaint process more accessible. These include making complaint forms readily available and training all police employees to assist in the complaint process.

"No one knows what the policy and procedure for an investigation is."
Stamford Police Dept.

The Commission on Accreditation for Law Enforcement Agencies states that "Procedures for registering complaints should be made available to the community through the media or the agency's community relations program,"[41] and the International Association of Chiefs of Police recommends that "public complaint packages" with forms and explanatory material be available at "designated public locations."[42] Yet 23 percent of municipal police departments told our callers that the department had no citizen complaint form and 52 percent indicated that forms were available only at police headquarters. Many others could not or would not answer the questions. And the accuracy of the answers was questionable: in four cases where respondents said that no complaint form existed we found a form on the department's website.

"There is no real written procedure on how to take a complaint."
Windsor Police Dept.

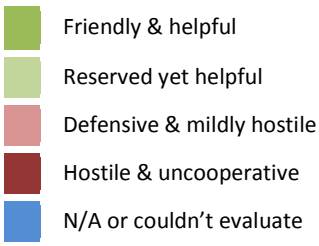
The Department of Justice recommends that complaint forms be available on police agencies' websites whenever possible[43] and that there should be a mechanism to submit them electronically. Our review of all municipal police department websites in Connecticut found complaint forms on only 24 percent, and a substantial number of forms were difficult to locate without an extensive search of the site. The state police website has a prominent online form, one of the few that can be submitted electronically.

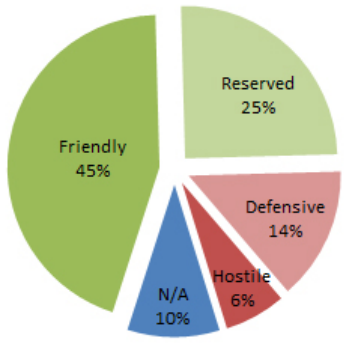
Likewise, despite the broad consensus that complaints should be accepted by phone,[44] our volunteers frequently had to navigate through difficult automated phone messages. Only one automated system offered an option for filing a complaint.

One of the clearest points to emerge from our survey and research was that the best civilian complaint policies are pointless if the public doesn't get accurate information about them. For this reason, all the standard-setting organizations recommend training to ensure that police are knowledgeable and polite when receiving complaints.[45] The International Association of Chiefs of Police recommends that "Every officer should know exactly where to refer a complainant or be prepared to receive the information and pass it on to a supervisor."[46] And the Attorney General of New Jersey emphasizes: "At no time should a complainant be told to return at a later time to file his report."[47]

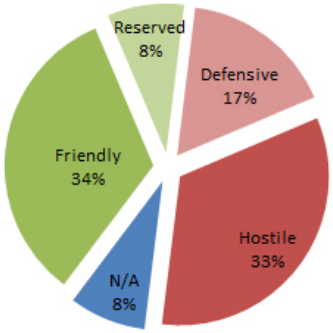
While many of the police employees who answered our calls were helpful, knowledgeable and concerned, some were openly hostile from the start and others became uncooperative after a few questions.

Our volunteer callers rated the demeanor of each respondent, revealing a disparity between the 12 state police barracks and the 92 municipal police departments surveyed.





Municipal Police Departments



State Police Barracks

Many respondents didn't know the answers to our questions, refused to connect the caller to someone who could answer the questions, provided incorrect information or refused to answer altogether. In some cases where the caller spoke to more than one employee, the employees provided contradictory information. Some of those police agencies may have robust complaint processes and it may be that our caller happened to encounter a particularly uninformed employee. But the point is that all officers and civilian employees should know the procedures so that would-be complainants are not turned away. Training is the obvious key to improvement in this area.

Track all complaints

While the scope of this study is limited to the ways in which Connecticut police departments accept complaints from the public, it became obvious during our research that tracking the complaints will be crucial to identifying and correcting any deficiencies in the way those complaints are

subsequently handled. There is universal agreement on the importance of keeping records of the intake and disposition of all complaints.[48] The Commission on Accreditation for Law Enforcement Agencies, the Department of Justice COPS office and the International Association of Chiefs of Police recommend that departments categorize each complaint and create a clear report with an express disposition: the complaint was upheld, it was determined to be unfounded, the officer was exonerated or there was insufficient evidence to conclude that misconduct occurred.[49] These reports should be kept available for internal analysis and audits.[50] Also, whenever possible, the complainant should be notified of the complaint's disposition.[51]

Additionally, the same three agencies recommend making reports of complaint statistics available to the public.[52] These reports should summarize how many complaints came in, the types of complaints that were made and how the complaints compared to prior years' tallies.[53] That information would permit the public to evaluate the departments' progress and would create the transparency required to instill public trust.[54]

The goal of this study is to create a clear set of standards for accepting complaints of police misconduct in Connecticut, based on the best practices promoted by law enforcement organizations and policymakers. We believe these standards would best be codified by statute so that police departments across the state will have clear guidance on handling civilian complaints. Meanwhile, we suggest that every police department evaluate its policies and procedures with this report in mind and adopt the following recommendations.

VI. Recommendations

- **Establish a written policy regarding complaints of police misconduct.** Our survey found that many police employees were unaware or unsure of the existence of such a policy in their departments. Promulgating a clear and consistent procedure for accepting civilian complaints is a standard, basic principle of good law enforcement.

- **Generate a form for civilians to initiate investigations of such complaints.** The respondents at 23 percent of the municipal police departments surveyed told us there was no complaint form for civilians to fill out. A readily available form is absolutely necessary to begin a fair, accessible and orderly complaint process.

- **Publicize complaint procedures online and with brochures available at public locations.** Complaint forms for only 24 percent of municipal police departments in Connecticut could be found online. Posting the forms and explanatory brochures on the Web and making them available at public facilities, such as town halls and libraries, will help assure wide access.

- **Train all sworn officers and civilian employees to accept all complaints.** Our survey found many agencies where police employees could not provide information about the complaint process, provided contradictory information or referred our callers to other employees who could not be reached. Every sworn officer and civilian employee in a police agency should know how to handle a complaint.

- **Accept all complaints from everyone, whether anonymous or made on behalf of others.** Respondents at only 29 percent of the 92 municipal police agencies surveyed said they would accept anonymous complaints, despite clear recommendations from law enforcement policy experts to accept all complaints, including anonymous and third-party complaints, as well as complaints from minors.

- **Impose no time limits or deadlines on filing complaints.** Many Connecticut police departments impose an arbitrary time limit for filing a complaint. Some respondents to our survey said their departments require that complaints be filed in 30 or 60 days, and one within 10 days. There is no rational basis for a time limit, and experts recommend against them.

- **Accept all complaints in any form, whether in person, by phone, Internet, mail or fax.** Fifty-eight percent of respondents to our survey reported that their police agencies would accept complaints only in person at the police station, ruling out all other forms of delivery in contravention of widely accepted best practices. The deterrent effect is obvious.

- **Refrain from requiring sworn statements or threatening criminal or civil liability for filing a complaint.** Law enforcement policy experts clearly and strongly denounce the practice of threatening prosecution or lawsuits for false complaints. A complainant who may already feel unfairly treated by police may very well fear retaliation for a valid complaint.

- **Adopt and publicize a rule that no person's immigration status will be questioned merely because he or she filed a complaint of police misconduct.** One of the most disturbing findings of our survey was that respondents at 67 percent of Connecticut police agencies could not assure our callers that a complainant would not be turned over to immigration authorities merely for complaining of police misconduct. This creates a class of people with no protection from police abuse, including anyone with undocumented or uncertain immigration status.

- **Investigate all complaints, no matter how minor.** While the scope of our survey was limited to police practices for accepting complaints, it's also important that each complaint be investigated appropriately. A comprehensive internal affairs policy for classifying and investigating complaints is crucial to maintaining the public trust.

- **Document all complaints and their dispositions.** Each complaint should be documented and recorded in writing, along with the eventual disposition of each case. This is the only way to ensure accountability for everyone involved.

- **Notify the complainant of the disposition.** Whenever the identity of the complainant is known, he or she should be notified of the police agency's disposition of the case. Civilians have a right to know that their cases have been investigated and what the outcomes are.

Notes

[1] INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, NATIONAL LAW ENFORCEMENT POLICY CENTER, INVESTIGATION OF EMPLOYEE MISCONDUCT 1 (1990, rev. Jan. 2007), *reprinted in* U.S. DEPARTMENT OF JUSTICE OFFICE OF COMMUNITY ORIENTED POLICING SERVICES, BUILDING TRUST BETWEEN THE POLICE AND THE CITIZENS THEY SERVE, App. F, at 80 (2010), *available at* www.cops.usdoj.gov/files/RIC/Publications/e080917232-BuildingTrust.pdf.

[2] NEW YORK STATE POLICE & CONNECTICUT OFFICE OF THE ATTORNEY GENERAL, REPORT ON THE EVALUATION OF THE CONNECTICUT DEPARTMENT OF PUBLIC SAFETY INTERNAL AFFAIRS PROGRAM 132 (2006), *available at* www.ct.gov/ag/lib/ag/other/conn_report_12-04-06.pdf.

[3] *Id.* at vi.

[4] *Id.*

[5] MARCUM ADVISORY GROUP, AN INDEPENDENT REVIEW: CITY OF HARTFORD, CONNECTICUT, POLICE DEPARTMENT INTERNAL AFFAIRS DIVISION 5, 11-12 (Sept. 21, 2011) (citing *Cintron v. Vaughn,* Docket 13,578 (D. Conn. June 21, 1973) and a 2010 settlement agreement in the same case), hartfordinfo.org/issues/wsd/Crime/CTfinalreport092111.pdf

[6] *Id.* Ex. 4 (Excerpts from Audit Commissioned in 2008).

[7] HARTFORD POLICE DEPARTMENT, PUBLIC COMPLIMENT OR COMPLAINT PROCESS, police.hartford.gov/Community%20Handouts%202006/2010/2009_02_18_ComplimentComplaint%20(2).pdf.

[8] Letter from U.S. Department of Justice, Civil Rights Division, to East Haven Mayor Joseph Maturo, Jr. 13 (Dec. 19, 2011), www.newhavenindependent.org/archives/upload/2011/12/East_Haven_Findings_Letter_12-19-11.pdf.

[9] *Id.* at 14.

[10] *See id.*

[11] *See* SETTLEMENT AGREEMENT AND ORDER, UNITED STATES OF AMERICA V. TOWN OF EAST HAVEN; EAST HAVEN POLICE DEPARTMENT; EAST HAVEN BOARD OF POLICE COMISSIONERS (2012), *available at* www.acluct.org/downloads/EHPDsettlement102212.pdf

[12] *Id.* at 10.

[13] Peter Abblebome, *Police Gang Tyrannized Latinos, Indictment Says,* NEW YORK TIMES (Jan. 24, 2012), www.nytimes.com/2012/01/25/nyregion/connecticut-police-officers-accused-of-mistreating-latinos.html

[14] NEW YORK STATE POLICE & CONNECTICUT OFFICE OF THE ATTORNEY GENERAL, *supra*, at 146-55.

[15] OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, INTERNAL AFFAIRS POLICY & PROCEDURES 16 (1991, rev. Sept. 2011).

[16] U.S. DEPARTMENT OF JUSTICE OFFICE OF COMMUNITY ORIENTED POLICING SERVICES, STANDARDS AND GUIDELINES FOR INTERNAL AFFAIRS 14 (2009), *available at* www.cops.usdoj.gov/Publications/e060930210-InternalAffairs.pdf.

[17] BEAU THURNAUER, BEST PRACTICES GUIDE, SMALLER POLICE DEPARTMENTS TECHNICAL ASSISTANCE PROGRAM, INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INTERNAL AFFAIRS: A STRATEGY FOR SMALLER DEPARTMENTS 2 (2008) (emphasis in original), *available at* www.theiacp.org/LinkClick.aspx?fileticket=4B%2F4SDZtgV8%3D&tabid=392.

[18] COMMISSION ON ACCREDITATION FOR LAW ENFORCEMENT AGENCIES (CALEA), STANDARDS FOR LAW ENFORCEMENT AGENCIES 52.1.1 (2006).

[19] THURNAUER, *supra*, at 2.

[20] OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 16.

[21] SETTLEMENT AGREEMENT AND ORDER, *supra,* at 33

[22] *See* 2007 INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, *supra*, at 8, *reprinted in* 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, App. F, at 87; 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, at 22. *See also* CALEA, *supra*, at 52.1.2; OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 16-17.

[23] The responses characterized as "could not or would not answer the question" include "it depends," "I don't know" and other expressions of uncertainty as well as refusals to answer the question and cases where the respondent terminated the conversation by hanging up.

[24] COMMISSION ON ACCREDITATION FOR LAW ENFORCEMENT AGENCIES, www.calea.org/content/calea-client-database.

[25] THURNAUER, *supra*, at 2.

[26] Most of the remaining responses were "no" but some were "I'm not sure" or other expressions of uncertainty and some were refusals to answer the question and cases where the respondent hung up.
[27] 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 17.
[28] OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 16.
[29] THURNAUER, *supra*, at 2.
[30] HAMDEN POLICE DEPARTMENT, HAMDEN POLICE DEPARTMENT CITIZEN REPORT, www.hamden.com/filestorage/219/228/262/Citizen_Report.pdf.
[31] Letter from U.S. Department of Justice, Civil Rights Division, to East Haven Mayor Joseph Maturo Jr., *supra*, at 14.
[32] 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 17.
[33] The policy states:

> Filing of false complaints is not a widespread problem in most localities. However, to guard against this possibility, some officers advise the complainant of the penalties for filing a false complaint. This is not a good general practice as it creates a chilling effect on the entire complaint reporting and filing process and could be perceived by others as an attempt to intimidate potential complainants.

2007 INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, *supra*, at 8, *reprinted in* 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, App. F, at 87.
[34] The provision reads:

> A person is guilty of false statement in the second degree when he intentionally makes a false written statement under oath or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable, which he does not believe to be true and which statement is intended to mislead a public servant in the performance of his official function.

Conn. Gen. Stat. § 53a-157b (2012).
[35] CONNECTICUT DEPARTMENT OF PUBLIC SAFETY, CITIZEN'S GUIDE TO MAKING COMMENDATIONS AND COMPLAINTS, www.ct.gov/despp/cwp/view.asp?a=4201&q=494676.
[36] CONNECTICUT DEPARTMENT OF PUBLIC SAFETY, COMPLIMENT/INQUIRY/COMPLAINT FORM, www.dir.ct.gov/dps2/WebForms/calea_form.htm.
[37] *See Craig v. Stafford Construction*, 856 A.2d 372, 379-82 (Conn. 2004).
[38] *Id.* at 382. Still, a civil suit might be brought in the exceptional case where a complainant files a vexatious complaint with malice. *See Rioux v. Barry*, 927 A.2d 304, 309-10 (Conn. 2007).
[39] 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 17.
[40] *See* Applebome, *supra*.
[41] CALEA, *supra*, at 52.1.4 (cmt.)
[42] 2007 INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, *supra*, at 8, *reprinted in* 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, App. F, at 87. *See also* OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 11 (advocating public meetings to educate about complaint procedures).
[43] 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 16.
[44] THURNAUER, *supra*, at 2; 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, at 21.
[45] CALEA, *supra*, at 52.1.4 (cmt.); THURNAUER, *supra*, at 2; 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, at 20-22, 29. *See also* NEW YORK STATE POLICE & CONNECTICUT OFFICE OF THE ATTORNEY GENERAL, *supra*, at 154-55.
[46] THURNAUER, *supra*, at 2.
[47] OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 16.
[48] CALEA, *supra*, at 52.1.2; NEW YORK STATE POLICE & CONNECTICUT OFFICE OF THE ATTORNEY GENERAL, *supra*, at 151-54; THURNAUER, *supra*, at 6-7; 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, at 22-30 (2010); 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 17-18, 36-39. *See also* OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 45.
[49] CALEA, *supra*, at 52.2.8; THURNAUER, *supra*, at 6; 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, at 22-30; 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 17-18, 36-39. *See also* OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 21-22.

[50] THURNAUER, *supra*, at 6-7; 2010 U.S. DEPARTMENT OF JUSTICE, *supra*, at 32; 2009 U.S. DEPARTMENT OF JUSTICE, *supra*, at 17-18, 36-39. *See also* OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 45-47.
[51] CALEA, *supra*, at 52.2.4; THURNAUER, *supra*, at 7; 2010 DEPARTMENT OF JUSTICE, *supra*, at 29. *See also* OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 16, 22.
[52] CALEA, *supra*, at 52.1.5; THURNAUER, *supra*, at 2, 6-7; 2010 DEPARTMENT OF JUSTICE, *supra*, at 32. *See also* OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, *supra*, at 50.
[53] THURNAUER, *supra*, at 7.
[54] THURNAUER, *supra*, at 2, 7; 2010 DEPARTMENT OF JUSTICE, *supra*, at 32.

Appendix A: Survey Instrument

Police Complaint Telephone Survey

ACLU-CT Survey: Police Accountability and Internal Affairs Practices

Overview

Goals: The ACLU-CT is conducting a series of "tests" to determine how readily municipal police departments provide basic information about filing a complaint with Internal Affairs to the average inquiring citizen. Our goals are to assess (1) how easy it is for an average citizen to get information about filing a complaint against a police officer, (2) how well employees of the police departments know their own procedures about filing complaints, (3) how complaints can be filed, and (4) what kind of restrictions exist on *who* can file a complaint and the ramifications of filing a complaint for certain individuals such as illegal immigrants.

General Volunteer Instructions: Volunteers will be calling municipal police departments across the state of Connecticut to ask specific questions regarding the departments' Internal Affairs policies. Volunteers will be calling to inquire about the procedure for filing a complaint against a police officer. It is extremely important that volunteers **do not suggest that an actual incident occurred** or provide any fictional details about an alleged incident. Providing false information to the police could result in charges for false reporting.

Volunteers must follow the script (below) as closely as possible and record their answers in the spaces below. Calls must be made from the ACLU-CT office during office hours (9:00am – 5:00pm).

To reiterate, it is not our intent to trick or entrap police departments or officers. We are trying to determine what information is provided to an individual inquiring about the internal affairs complaint process.

Call Instructions:

1. Please look over the script and familiarize yourself with the questions you will be asking.

2. **Dial *67** in front of the police department's number in order remain anonymous.

3. Remember, you are requesting information about how to file a complaint against a police officer.

4. You have absolutely no information about the incident or even whether an incident occurred. You only want to know about the process of filing a complaint. If they won't give you any information without details of the incident, note this.

5. If asked, you do not feel comfortable giving any information including your name. If the officer pressures you, ask why they want your name and record his/her answer.

6. Please stick to the script! Only ask the exact questions in the script. Never change the wording. If the officer cannot answer a question please ask if there is someone you can speak with that can help you.

7. Please do not ask leading questions. You should only repeat the exact questions and should not initiate other questions. Feel free to repeat questions as many times as you feel you need, but you are not trying to entrap the officer. Our goal is to simply understand what information the "average" person would receive when asking about making a complaint.

8. Please be specific when documenting answers on the attached form. Please do not wait to fill out the form until after you have completed the call.

9. You MUST complete the entire form (or if questions could not be answered, please note this and why). Be sure to include the information about the department and the length of your call. Also, please keep track of the process of getting the correct person on the line to answer your questions.

Department Information:

Department Name: _____

Telephone Number: _*67_____

Date/Time of phone call: _____

****WHEN CALLING, REMEMBER TO DIAL *67 BEFORE DIALING****

Script/Questions:

Before speaking with someone:

How long did it take to reach someone who could help you? _____

Did you have to navigate an automated system to reach someone?_____

Did the automated system have an option for filing a complaint?_____

Were you put on hold?_____ How many times?____ How long?_____

How many times were you transferred? _____

Were you ever sent to voicemail? _____

Once someone is on the phone:

"Hi, I am calling because I am trying to find out how to file a complaint against a police officer. I don't know anything about this sort of thing, so I don't even know where to start. Can you tell me what I need to know?"

If asked what event occurred, respond: **"I am just trying to get some information on the complaint process." REPEAT IF NECESSARY**

3. **"How can someone file a complaint?**"_____

_____

"Is there a form?" (Y/N):_____

If yes, **"how does someone filing a complaint get the form?"**_____

_____

"Does a complainant have to come into the police department?"

In Person Requirement (Y/N):____

"Can someone make a complaint online, by mail or over the phone?"

Put an X next to each method a complaint can be filed.

In Person (Y/N):_____ Phone (Y/N):_____ Online (Y/N):_____ Mail:_____

Fax:_____

Comments (if by mail or online, please note how one would get the complaint form): _____

_____

_____

4. **"Does a person making a complaint have to give their name, or could he make the complaint anonymously?"** Anonymously (Y/N): _____

"Can a third party file a complaint for someone?" Third Party (Y/N): _____

5. **"Thanks, I was also wondering if complaints have to be filed within a certain amount of time?"** If they could not answer, push harder. Ask if you can speak with someone who can answer.

(Y/N): _____If yes, how long? _____ If unsure, what was said? _____

_____

Comments (optional): _____

_____

_____

6. **"So, what happens after a complaint is filed…?"**

a. **Does someone investigate?**_____

_____

b. **Does the person making the complaint have to talk to someone?**_____

_____

c. **Will the officer learn who filed a complaint against them?**_____

_____

d. **Will somebody let the complainant know what the results of the investigation?**_____

_____

e. **How long does the process take?**_____

_____

7. **"Does it matter if the person filing the complaint is under 18?"**

(Y/N):_____ If yes, **"how can someone under 18 file a complaint?"**_____

_____

Comments (optional): _____

_____

8. **"What if person making the complaint only speaks Spanish, would a translator be available?"** (Y/N): _____

"Are the forms available in Spanish?" (Y/N): _____

If unsure, what was said? _____

Comments (optional): _____

_____

9. **"Thank you for your help, I just have one more question. If an illegal immigrant wanted to file a complaint, would Immigration be called?"** (Y/N): ___

"Is there a way for an illegal immigrant to file a complaint without immigration be called?"

Response: _____

_____

_____

Comments (optional): _____

_____

_____

"Thank you for your time. Have a nice day, good-bye."

Length of Phone Call: _____

Post call – reflection:

Comments (optional): _____

_____

_____

9. How would you rank to the tone of the employee you spoke with most?

Friendly & Helpful	Reserved yet still helpful and willing to answer my questions	Defensive and mildly hostile	Hostile & uncooperative

Comments (optional): _____

_____

_____

Additional Comments Regarding the Phone Call:

Appendix B: Police Agency Summaries

Police Complaint Telephone Survey

Selected responses from Connecticut police agencies to the telephone survey conducted by the ACLU of Connecticut. These responses answer key questions about the availability of complaint forms to civilians, the agency's willingness to accept anonymous complaints against police officers and the consequences for an undocumented immigrant who files a complaint.

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
Ansonia	at the station	unsure	doesn't know
Avon	at the station	yes	no
Berlin	no form; speak to the officer you want to complain about in the station and if you're unhappy with that, then you can talk to a supervisor	no	probably
Bethel	at the station	no	no
Bloomfield	at the station	no	no
Borough of Groton Long Point	at the station	no	no
Branford	at the station	no	no
Bridgeport	at the station; must swear to truth of statements	no	no
Bristol	no form; complaint taken orally and in person	no	unsure
Brookfield	at the station	no	no

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
Canton	at the station	no	does not know
Cheshire	at the station	no	does not know
Clinton	at the station	no	no
Coventry	at the station or online	depends	depends
Cromwell	at the station or online	no	no
Danbury	at the station	no	refused to answer
Darien	no form	yes	no
Derby	no form	yes	yes
East Hampton	at the station, fax, mail or online	yes	no
East Hartford	at the station	no	refused to answer any more questions
East Haven	in person or online	no	unsure
East Windsor	at the station	no	depends
Easton	no form; complaints can be made at the station	no	unsure
Enfield	at station or online	yes	probably not
Fairfield	at the station or online	no	unsure
Farmington	at the station	yes	hung up on caller

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
Glastonbury	at the station	no	unsure
Granby	no form; complaints can be made at the station	no	unsure
Greenwich	at the station or request that a form be mailed	yes	no
Groton City	at the station	no	no
Guilford	no form	yes	hung up on caller
Hamden	at the station or online	no	no
Hartford	at the station or online	no	no
Madison	unable to get answers during the two calls		
Manchester	at the station or online	yes	no
Meriden	at the station or online	yes	no
Middlebury	no form	no	yes
Middletown	at the station, must be notarized	no	yes
Milford	at the station; must talk to sergeant	yes	"You would have to come in to find out."
Monroe	unable to reach supervisor to answer questions		
Naugatuck	at the station or online	yes	depends
New Britain	at the station	no	yes

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
New Canaan	at the station	no	yes
New Haven	at the station, by mail or online	no	does not know
New London	at the station or online	yes	no
New Milford	at the station	no	no
Newington	at the station	no	yes
Newtown	at the station or online	no	no
North Branford	at the station	no	unsure
North Haven	at the station or can be mailed	no	"We never have [called Immigration] in the past."
Norwalk	at the station	no	no
Norwich	at the station	yes	probably not
Old Saybrook	at the station	no	probably
Orange	at the station	no	refused to answer
Plainfield	must come to station and speak to supervisor before filing complaint form	no	does not know
Plainville	at the station, must speak to sergeant	no	no
Plymouth	at the station or by mail	no	depends on nature of complaint

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
Portland	at the station	no	yes
Putnam	no form; must speak to chief of police	yes	no
Redding	no form	no	no
Ridgefield	at the station	no	no
Rocky Hill	at the station	yes	yes
Seymour	at the station	no	no
Shelton	at the station	no	unsure - depends on the situation
Simsbury	at the station	yes	no
South Windsor	at the station	depends	refused to answer any more questions
Southington	at the station	no	yes
Stamford	no form; come in and speak to supervisor	no	possibly
Stonington	no form but will accept written complaint	yes	probably not
Stratford	at the station	no	yes
Suffield	no form; must speak to supervisor or detective	no	does not know
Thomaston	no form but must sign a sworn statement	no	yes (unless domestic violence)
Torrington	no form	no	no

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
Town of Groton	no form	no	unsure
Troop A	police fill form out; also available online	no	unsure
Troop B	online	yes	unsure
Troop C	at the troop barracks or online	yes	no
Troop D	at the troop barracks or online	refused to answer any more questions	
Troop E	online form goes to headquarters; barracks has no complaint form	no	yes
Troop F	no form	yes	refused to answer more questions
Troop G	refused to answer		
Troop H	online	unsure	unsure
Troop I	at the troop barracks or online	depends	no
Troop K	at the troop barracks or online	yes	no
Troop L	at the troop barracks or online	yes	refused to answer
Troop W	could not reach supervisor to answer questions		
Trumbull	at the station	yes	yes
Vernon	could not answer questions; need to come to station		
Wallingford	at the station or by phone	yes	no

Department Name	"How does someone filing a complaint get the form?"	"Could he make the complaint anonymously?"	"If an illegal immigrant wanted to file a complaint, would Immigration be called?"
Waterbury	at the station	yes	does not know
Waterford	at the station	no	no/unsure
Watertown	at the station	yes	does not know
West Hartford	could not reach supervisor to answer questions		
West Haven	at the station or online	no	unlikely
Weston	could not reach supervisor to answer questions		
Westport	no form	yes	yes
Wethersfield	at the station or online	no	unsure
Wilton	no form; can come to station or can call or email sergeant or chief	yes	no
Winchester	no form; must come to station	no	does not know
Windham / Williman tic	at the station	no	no
Windsor	no form	yes	yes
Windsor Locks	could not reach supervisor to answer questions		
Wolcott	at the station	yes	refused to answer
Woodbridge	at station or officers can come to house	yes	yes

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