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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 DELPHINE ALLEN, et al.,
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13 Plaintiffs,
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15 v.
16 CITY OF OAKLAND, et al.,
17
18 Defendants.

Case No. C 00-4599 TEH

**DEFENDANT CITY OF OAKLAND'S
APRIL 21, 2016 PROGRESS REPORT
PURSUANT TO SEPTEMBER 28, 2015
ORDER REQUIRING QUARTERLY
REPORTS AND MARCH 4, 2016 ORDER
ALLOWING EXTENSION TO FILE
REPORT**

22 Defendant City of Oakland ("City") files the attached progress report pursuant to the Court's
23 September 28, 2015 Order Requiring Quarterly Reports on Arbitrations which provides:
24 "Defendants shall continue to implement these recommendations and shall file quarterly progress
25 reports on or before March 31, June 30, September 30, and December 31 each year." September
26 28, 2015 Order at 1:12-16 (Dkt. No. 1071). The next report was due on March 31, 2016.

1 On March 4, 2016, the Court extended the time for the Court Investigator to file his next
2 report to March 21, 2016. March 4, 2016 Order (Dkt. No. 1086). In turn, the Court extended the
3 time for the City to file the attached report to **April 21, 2016**.

4 The City also files an addendum under seal to protect the confidentiality of disciplinary and
5 personnel information related to certain police disciplinary actions. The addendum will be filed
6 pursuant to the Court's September 3, 2015 Order (Dkt. No. 1068) allowing such filing under seal.
7

8 Dated: April 21, 2016

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By: /s/ Barbara J. Parker
Attorneys for Defendants
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DELPHINE ALLEN v. CITY OF OAKLAND, et al.

PROGRESS REPORT NO. 3

This is the City's Third Progress Report. The Court has ordered that the City provide quarterly Progress Reports, beginning on December 31, 2015.

The City thanks the Court's appointed investigator, Edward Swanson, and his team, including Audrey Barron, for the time and effort they devoted to the Court's follow-up investigation. The City will address each recommendation in turn, but will speak first to some of the report's more general observations.

We appreciate the recognition of some of the City's improvements, not the least of which is the fact that the Oakland Police Department ("OPD") and City Attorney's Office ("OCA") have been working as a team on investigations and accountability. We equally appreciate the recognition that police arbitration hearings often can be exceedingly difficult to win despite the City's thorough and fair investigation and solid strategy and vigorous advocacy.

Given that arbitration hearings result from painstaking collaborations between hardworking OCA attorneys and equally hardworking OPD witnesses and representatives, losses can be deeply troubling for the team members and the City's leadership. Losses in termination cases are often the most infuriating and discouraging, for obvious reasons. In its January 26, 2016 Order, the Court questioned whether the City was taking adverse decisions seriously enough and whether the City was attempting to downplay them. In truth, the City was trying to present the case outcomes factually, without editorializing. In the process, however, we did not express how seriously we take each adverse decision. We take this opportunity to clarify.

As Mr. Swanson's report acknowledges, no City, no matter how well prepared, can expect to win every police arbitration. The City takes disciplinary actions that it believes are warranted without regard for the difficulties associated with prosecuting cases and the stresses associated with losing them. Nevertheless, Mr. Swanson's acknowledgement of some of our efforts will make it a little easier for the City to continue making disciplinary decisions that otherwise are very difficult to make and difficult to defend. Measured recognition encourages and provides support for the people at OPD and OCA who work on the police disciplinary process from investigations through hearings to continue giving their best efforts, even after major

setbacks. Through ongoing hard work and improvement, we hope to continue earning the trust of the Court and of Plaintiffs' counsel. Most importantly, we want to continue earning the trust and confidence of the community we serve.

In our first two progress reports, we informed the Court that the City had completed most of the recommendations in the Court Investigator's April 2015 report, and that implementation of the outstanding recommendations was well underway. This report includes the following: (1) a chart that provides information regarding police arbitration decisions that were issued after we completed the December 2015 Progress Report; (2) an update of the status of the recommendations that the City had not fully implemented when we filed the December 2015 report; and (3) the City's response to the recommendations in the Court Investigator's March 21, 2016 report.

I. Arbitration Decisions Since December 2015 Progress Report

Two police-related arbitration decisions have been issued since we filed the December 2015 report.

	GRIEVANT & VIOLATION	CITY'S DISCIPLINE	ARBITRATOR'S DECISION	OUTCOME	DECISION DATE
1	Officer A Use of Force and Reports / Bookings	Termination ¹	Overtured City's decision to terminate.	15-day suspension	3/1/16
2	Officer B Performance of Duty and Conduct Toward Others	12-day suspension	Reduced City's discipline.	10-day suspension	3/12/16

II. Outstanding Items from December 2015 Progress Report

1) Recommendation:

The Department should coordinate with the OCA to address outdated rules and policies so they do not undermine the disciplinary process.

September 2015 Status: OCA and OPD are reviewing the rules and policies that were at issue in the arbitrations covered by the investigation, as well as arbitration decisions that have been issued subsequently. OPD is prioritizing use of force and related policies.

¹ This is the second termination case Mr. Swanson discussed in his March 2016 report.

September 2015 Projected Time Frame for Completion: OPD estimates a time frame of 16 to 18 months to update entire policy manual.

December 2015 Status Update: OPD continues to work on updating the entire policy manual. OPD is on track to complete the update within the 16- to 18-month time frame projected for completion.

April 2016 Status Update: OPD is still on track to complete the update within the 16- to 18-month time frame projected for completion.

2) Recommendation:

The Department should revamp its Skelly hearing process. Skelly officers should receive training on conducting thorough IA investigations to ensure that their decisions cannot be effectively challenged at the arbitration stage for having been based on insufficient investigation. Skelly officers should be trained and given guidelines on writing detailed Skelly reports. OCA should be made part of the process, particularly in the drafting of letters of intent to discipline. Department should assign all serious cases (those involving at least one Class I allegation) to a Deputy Chief, to the Assistant Chief, or to the Chief him or herself.

September 2015 Status: The City's Fiscal Year 2015-2017 budget funds an additional Deputy Chief to handle the majority of Skelly hearings, i.e., all discipline of more than five days. This position was filled by a promotion that became effective on August 15, 2015. OCA has historically provided training to OPD's Skelly officers and will continue to do so. Two of OCA's Labor & Employment attorneys are currently working on an updated Skelly officer training, which will be conducted on or before December 1, 2015. Also, a new Administrative Instruction drafted by the City Attorney and signed by the City Administrator specifies how information on police investigations and discipline is to flow to OCA from OPD and Employee Relations. The AI is designed to make OCA a part of the entire disciplinary process.

September 2015 Projected Timeframe for Completion:

1. OPD should assign all serious cases to Deputy Chief or above: **Done.**
2. OCA should be made part of the process: **Done.**
3. Skelly officers should be trained and given guidelines: Ongoing, done by December 2015.

December 2015 Status Update:

1. OCA developed a two-part training for the Deputy Chief who handles the majority of *Skelly* hearings. (i.e., all discipline exceeding five days). The training sessions were held in November 2015 and lasted approximately one and a half hours each. The next step is for OCA and the Deputy Chief to administer the training to the rest of OPD's *Skelly* officers, which will be completed by January 22, 2016.

April 2016 Status Update:

1. OCA and the Deputy Chief jointly administered the training to the rest of OPD's *Skelly* officers. The training was completed on January 21, 2016. As discussed below, OCA and OPD will continue to update the training and administer it on at least an annual basis. **Done.**

III. Implementation of New Recommendations

1) *Supervisor Accountability*

Recommendation:

Wherever appropriate in the police discipline process, OPD should examine not only whether a supervisor knew of misconduct that he or she did not report, but also (1) whether a supervisor ordered or otherwise caused the misconduct; and (2) whether the supervisor failed to sufficiently supervise the officer accused of misconduct.

City's Comment:

As part of the police discipline process, OPD already examines whether a supervisor ordered or otherwise caused the misconduct in question. OPD will further develop the Member/Employee Accountability Section of the IAD Report of Investigation (ROI). The revised section will include two subsections. The first will address whether any member or employee observed misconduct or was otherwise aware of it. The second subsection will address whether any supervisor ordered or caused the action which led to the violation.

2) *Policy & Training Recommendations*

Recommendation:

The Department should establish a process to seek from IAD, Skelly officers, supervisors, attorneys, or others recommendations to improve Department policies, trainings, and police discipline process. One possibility is to assign a

coordinator, possibly within OIG, to serve as a clearinghouse for these recommendations. Whatever process is established for responding to these recommendations, it should result in (a) recommendations being routed to the appropriate personnel for response and, if appropriate, implementation of necessary changes; (b) a response to the party making the recommendation; and (c) documentation of the process.

City's Comment:

OPD will establish a process to seek recommendations concerning policy, training, and the discipline process from IAD, Skelly officers, supervisors, attorneys, and others. The following process will be implemented:

- The IAD Civilian Manager will route such recommendations from IAD reports to the Research and Planning Manager (policy) and the Training Section Commander (training). Recommendations concerning the discipline process will be addressed within IAD.
- The Force Review Board Coordinator will continue to route deliverables concerning policy to the Research and Planning Manager and deliverables concerning training to the Training Section Commander.
- Skelly officers will notify the Research and Planning Manager of policy recommendations and the Training Section Commander of training recommendations.

3) Training Materials and Instructors

Recommendation:

The Department should instruct SMEs that testifying as to the substance of training they administer is required to serve as an SME. OPD should also ensure that its databases track all forms of officer training, whether as a result of academy, supervisor request, or discipline, in a centralized and easily searchable location. To the extent possible, the records should identify the topics of each training. OPD should also make every effort to ensure materials for related trainings are easily identified and accessible. And the Training Section should provide records and materials to attorneys preparing for arbitration in an efficient manner.

City's Comment:

OPD will take this opportunity to clarify with SMEs their role in the discipline process, especially in providing testimony. There is a concern, however, with disqualifying SMEs based on an inability or unwillingness to testify. This concern is based on the extremely limited pool of available SMEs within OPD and the greater law enforcement community.

OPD's Training Section keeps track of formalized training. Less formal trainings are not always documented and provided to the Training Section. Documenting training more widely and deeply may require the addition of another position to the Training Section.

Department General Order B-20, Department Training Procedures, VIII C, states:

C. Specialized unit-level training may be accomplished without utilizing the resources of the Training Division, but must comply with the following provisions:

1. A lesson plan shall be submitted to the Training Division Commander prior to any actual training in accordance with the provisions of Part IV, B, 1, of this order.

Part IV, B, 1 states:

B. Instructor Responsibilities

Instructors conducting Departmental training (except line-up or NSA-related publication training) shall:

1. Submit a lesson plan to the Training Division Commander prior to presentation of the course. The lesson plan shall:
 - a. Identify the name of the course;
 - b. Identify the course instructor(s);
 - c. Identify the location(s) of the training;
 - d. Identify the learning objectives/goals of the course;
 - e. Identify and describe any learning/instructional activities;
 - f. Chronologically list the order of the lesson and estimated length of segments;
 - g. Identify any written, oral or practical examinations;
 - h. Include copies of any instructional materials (i.e. handouts, videos, etc.) used during the training; and
 - i. If applicable or required, the lesson plan shall also:
 - 1) Describe any activity that will require the manipulation or wearing of safety equipment;
 - 2) List all equipment/training aids that will be used by either the instructor or student(s); and
 - 3) Identify the appointed Safety Coordinator and list all appropriate POST and Departmental safety guidelines and protocols.

The Training Section will evaluate the need for additional staff to ensure that all training is tracked and all training materials are provided to the Training Section in order to comply with the above policy.

4) Comparable Discipline

Recommendation:

The Department should consider comparable discipline in all cases, should document that process where appropriate, and should be prepared to present evidence at arbitration regarding its consideration of comparable discipline. Additionally, should an officer grieve his or her discipline to Step 3, Employee Relations ("ER") should conduct its own analysis of whether the imposed discipline is consistent with past discipline in similar cases, and include that determination in its Step 3 response.

City's Comment:

The Chief of Police will consider past discipline in all cases. The Chief of Police will document the rationale for imposing discipline when the discipline differs significantly from what has previously been imposed for the same offense. The Chief of Police will be prepared to testify as to the basis of discipline at arbitration.

5) IAD Civilian Manager

Recommendation:

The Civilian Manager within IAD should be responsible for developing institutional memory within IA, potentially through the development of an IAD manual.

City's Comment:

OPD has an IAD manual. The IAD Civilian Manager will facilitate the revising of this manual.

6) Skelly Officer Training

Recommendation:

OCA and OPD should continue to work together to update Skelly hearing officer training and refresh Skelly officers on at least an annual basis.

City's Comment:

Having received positive feedback from the *Skelly* officers, OPD and OCA were pleased with the outcome of training they jointly presented in January 2016. OCA and OPD will continue to train *Skelly* officers, at least on an annual basis.

7) Police Arbitration Reforms

Recommendation:

OCA and the City should continue to press for improvements in the police arbitration process, including sharing discovery and witness lists before arbitration and agreeing to a fixed panel of arbitrators.

City's Comment:

The City intends to continue pressing for reforms to the arbitration process, including mutual discovery and a fixed arbitrator panel.

8) OPD Departmental Counsel

Recommendation:

The current relationship between OPD and OCA for services beyond discipline investigations and arbitrations is inadequate and puts the Department's discipline process at risk. OPD should hire its own internal general counsel, who reports directly to the Chief. The City should provide the necessary funding to the Department for this position.

City's Comment:

In July 2013, the City Council began to restore some of the positions that were cut from OCA during the preceding ten years, allowing the City to begin to rebuild its legal department.² In terms of labor and employment positions, the additional resources have primarily supported OPD. As the investigation report confirms, the City has seen returns on this investment. We agree that an additional investment is warranted to furnish the resources necessary for OCA to provide dedicated legal support by Departmental Counsel for OPD within the parameters of the City Charter.

² During the 2003 and 2013 decade, the City Attorney's Office lost more than one-third of its staff – 19 attorneys and 14 support staff – due to budget cuts. The City Attorney's Office lost attorneys every year from FY2002-03 through FY2011-12. The City's fiscal year (FY) is July 1 through June 30.

OCA will assign a supervising attorney to serve as OPD's dedicated Departmental Counsel and the City Administrator, Mayor and Chief of Police will recommend to the City Council the addition of a full-time-equivalent Deputy City Attorney III to support the supervisor. Currently, the supervising attorney assigned as Departmental Counsel to OPD simultaneously supervises and advises multiple departments and bodies, such as the Fire Department, Office of Emergency Services, the Public Ethics Commission and staff, and the Council's Public Safety Committee; the position also currently supervises or researches and drafts public-safety related legislation for the Council and individual Councilmembers such as gun safety ordinances. Going forward, the Departmental Counsel position will provide fully dedicated service to OPD, excluding disciplinary legal advice and counsel, and serve as OPD's liaison to OCA. The addition of a supporting attorney will ensure that OCA is able to increase the level of service to OPD without decreasing necessary support for other departments and bodies.

To maximize the likelihood of a strong working relationship from the outset, it is important for OPD to have input on the front end when Departmental Counsel applicants are being recruited and interviewed. The Chief of Police and the City Attorney will work together to shape the job announcement to attract applicants with the strengths and expertise that are important to both offices. OCA will recommend two or more applicants who, in its opinion, are eligible and qualified to hold the Departmental Counsel position. The Chief of Police will review the list and may interview the finalists. The Chief of Police and the City Attorney will discuss their assessments of the finalists, after which the Chief will endorse one of them. The City Attorney will not unreasonably refuse to hire and assign the attorney that receives the Chief's endorsement.

In addition, if the Chief of Police believes OPD is receiving inadequate support from its Departmental Counsel, the Chief of Police needs a formal mechanism to address the issue with the City Attorney. The City Attorney, City Administrator and the Chief of Police will address legal support, including Departmental Counsel, during each of their monthly standing meetings, with the objective of identifying problems early so that the City Attorney has the opportunity to intervene and take corrective action.³ By making legal support a standing item on the monthly agenda, the City can continuously address issues until they are resolved. Also, the City Attorney and Chief of Police will have the benefit of the City Administrator's input and perspective. The City Attorney, Chief of Police and City Administrator may agree that a new Departmental Counsel needs to be assigned to OPD if other corrective action proves unsuccessful. The City

³ If at some point OPD is concerned about the advice it received from Departmental Counsel, the OPD will request a second opinion and the OCA, in accordance with its longstanding practice, will secure such opinion from outside counsel. In addition, the City Attorney secures outside conflict counsel when she or he has a conflict of interest regarding a particular matter.

Attorney understands that requests by the Chief of Police for a Departmental Counsel reassignment must be taken very seriously and will not unreasonably deny such requests.

While the City Attorney has had success in re-establishing and expanding OCA'S Labor and Employment unit, the City recognizes the need for a structural safeguard to help ensure sustainability. In addition to the standing monthly meetings, at the end of every fiscal year, as part of the annual Budget process, the Mayor, City Administrator, and Chief of Police will conduct a performance review of the level of service provided by the OCA to the Department for that year. If the review finds that inadequate legal services are being provided, the Mayor and City Administrator will discuss their findings with the City Attorney. If the Mayor, City Administrator, and City Attorney do not reach a resolution that addresses the Mayor's and City Administrator's concerns, the Mayor and City Administrator will provide a budget amendment to the City Council to adjust the City Attorney's budget.

To maintain the foregoing procedures and policies, OCA and City Administrator will memorialize the process for recruiting, hiring, evaluating and reassigning Departmental Counsel in corresponding policies.

OCA also has taken immediate steps to ensure that OPD has the Departmental Counsel support it needs. While the budget and recruitment processes go forward, OCA has assigned Interim Departmental Counsel. OCA has assigned a supervising litigation attorney who is well-versed in the liability and risk-management issues OPD faces, and who has an excellent working relationship with OPD's command staff.

9) Deputy City Attorney Full-Time Equivalent

Recommendation:

In order to maintain the position of the Deputy City Attorney currently assigned to IAD, future Oakland City budgets should include a full-time-equivalent attorney that is specifically charged with providing legal services to OPD related to IAD investigations, police arbitrations, and other police discipline matters. Should OCA fail to provide OPD with the services of that attorney, or should that attorney fail to provide the level of service required by OPD, the Mayor and City Administrator should send a budget amendment to City Council to reduce the City Attorney's departmental budget allocation in an amount equivalent to the Deputy City Attorney's salary.

City's Comment:

The undersigned City officials will recommend to the City Council that this measure be implemented during the mid-cycle budget process in June. Building on this recommendation, the City predicts that the full-time-equivalency will eventually need to be achieved by assigning several attorneys. In other words, to maintain the full-time service IAD currently receives, OCA will eventually need to assign more than one attorney. The attorney who is currently assigned to IAD works very hard in a high-stress environment. Allowing that attorney to share her work load with another attorney will allow her to have more diverse legal practice, which will reduce the risk of burnout and enhance and broaden her legal skills and expertise, providing greater insight and value to IAD. It will also create a redundancy in expertise that will be beneficial and which is one of the City's goals to provide continuity of services. The City believes this type of team approach is a very sustainable model.

10) Labor and Employment Supervisor

Recommendation:

The current Deputy City Attorney overseeing the Labor and Employment Unit should be reclassified as "Special Counsel – Labor and Employment." The position should require expertise in labor and employment matters, and should hold responsibility for overseeing OCA's work related to police discipline investigations and arbitrations. This will be an at-will classification, as the at-will status will help ensure that the person in this position continues to be held responsible for his or her efforts to oversee labor and employment matters, including police discipline investigations, grievances, and arbitrations.

City's Comment:

The undersigned City officials will recommend to the City Council that this measure be implemented in the upcoming mid-cycle budget as well. Through the City's Department of Human Resources Management, the City will work with the Civil Service Board to create the classification.

11) Quarterly Reports to City Council

Recommendation:

OCA should report to City Council quarterly on recent arbitration decisions, its efforts to support the police discipline process, and recent developments in police discipline. OPD should simultaneously provide a separate quarterly report to the City Council regarding IAD investigations, police personnel trainings, updates to

police policy, and recent developments in police discipline. Both OPD and OCA should simultaneously provide their reports to the Mayor and City Administrator.

City's Comment:

The City Administrator and OCA have scheduled quarterly public reports to the Council on OPD's and OCA's efforts to increase and sustain police accountability. The reports will include all information recommended by the Court investigator. The first report will be presented on May 17, 2016. Thereafter, the reports will be presented to the Council on the third Tuesday of July, October, January and April of each year.

12) Monthly Meetings with City Administrator

Recommendation:

Both OCA and OPD should meet with the City Administrator monthly to report on pending investigations and arbitrations, changes to OPD trainings and policies, and the working relationship between OPD and OCA.

City's Comment:

OPD, OCA and the City Administrator will schedule a monthly meeting to discuss these matters. The City Administrator already holds monthly meeting with IAD, with a focus on discipline issues (*Skelly* hearings, arbitrations, officers on administrative leave, and important cases).

13) Dissemination of Public Information

Recommendation:

The Mayor should disseminate easily accessible information to the public, on at least an annual basis, regarding police discipline in Oakland.

City's Comment:

The Mayor's Office shall produce twice a year an easy-to-read report that summarizes the information on police discipline provided to the Council in quarterly reports. The first Mayor's Report will cover a period up to December 31, 2015 and be published no later than June 15, 2016. This report shall include the following information:

- Number of cases accepted
- Number of separate allegations within the above cases

- Summary of misconduct allegations, as well as any cases lodged regarding OPD service, policy or procedure
- Number of investigations completed
- Case Dispositions - Number of cases and/or allegations administratively closed, sustained, not-sustained, unfounded, exonerated, and informally resolved
- With regard to sustained cases, the number of and type of discipline findings, including suspensions, counseling/training, written reprimands, and terminations.
- Policy or training recommendations as the result of IAD investigations, including:
 - Cause for department-wide training or policy recommendation
 - Explanation of training or policy recommendation
 - Status of recommendation or completion date
- Bar chart/graph showing trends in number of cases, subject officers, allegations, findings and discipline
- Number of sustained cases which entered arbitration since last reporting period
- Number of cases which concluded arbitration since last reporting period
- Arbitration findings: upheld, overruled, etc.
- OCA provided explanation of arbitration findings
- General discussion of policy changes relevant to discipline that have been undertaken or are underway.

Additional supplemental information may also be included that pertains to the overall health, well-being, performance and practice of Principled Policing by the Department (can be shown as bar chart or line graph with open data):

- Staffing levels
- Content and Hours of Training
- Number of complaints per officer
- Uses of force per officer
- Uses of force per arrest
- Uses of force per type or level of force
- Number of complaints per dispatched incident
- Uses of force per dispatched incident
- Sick hours per officer
- Officer involved shootings
- Vehicle pursuits
- Number of OCA claims received regarding police services

The report will clearly point viewers to the website where they can find on-going quarterly reports and other information of interest.

Mayor Libby Schaaf will continue to present her Safe Oakland Speaker Series to give the public free access to engaging speakers, including leading scholars and practitioners in the area of Principled Policing. Recent speakers have included Ron Davis, Executive Director of the President's Task Force on 21st Century Policing and Director of the COPS Office at the Department of Justice. Currently scheduled speakers include:

April 30, 2016: Tracy Meares, Yale Law Professor and Task Force Member, on procedural justice.

May 5, 2016 (tent.): Lynn Overmann, Senior Policy Advisor to US Chief Technology Officer, on the White House Open Police Data Project.

May 19, 2016 (tent.): Dr. Jennifer Eberhardt, on her analysis of OPD stop data and implicit bias in policing.

14) OIG Performance Measurements

Recommendation:

OIG should develop a plan to measure the performance of OPD at various points in the process of police discipline, including intake, investigation, Skelly hearings, and arbitration. OIG should also measure whether OPD is receiving the support that it needs to carry out fair discipline. The Mayor and City Administrator should present a budget that provides OIG with the resources it needs, including accredited auditors, to perform this additional function.

City's Comment:

OPD agrees with this recommendation in principle. OIG will readjust its audit plan to include more focused reviews of discipline-related processes and issues.


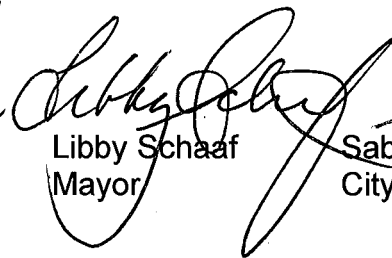

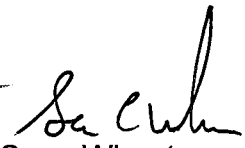
IV. Conclusion

The City has been working to build OPD into a more effective, professional and accountable police force. We are mindful that the NSA and the Court's oversight, including the Court investigator's reports, have made it possible for the City to make many improvements to the police procedures, practices and policies and to the disciplinary process for police officers.

The City does not claim to have the perfect police department, but we are nevertheless proud of the progress the City has made, including the steps it has taken to improve the disciplinary process for police officers. At the same time, we realize that work remains to be done, and we do not shy away from it. To continue improving OPD and to sustain those improvements, we know that work will always remain to be done, including after the NSA. As we discussed at the outset of this progress report, it is important that the hundreds of people working every day to improve OPD receive recognition and criticism in fair measure. Progress cannot be sustained without both.

The undersigned, Mayor, City Attorney, City Administrator and Chief of Police are among the people working to improve OPD. We are deeply committed, not just because of the NSA, but because we care about the people of Oakland and we appreciate that they too have been investing in OPD's future. Oakland *deserves* the most effective, professional and accountable police force possible. It is for these reasons that we will continue working.

Dated: April 21, 2016

			
Barbara J. Parker City Attorney	Libby Schaaf Mayor	Sabrina Landreth City Administrator	Sean Whent Police Chief

Addendum: Sealed Addendum re: Arbitration Decisions

ADDENDUM

**DOCUMENT FILED UNDER
SEAL ON APRIL 21, 2016
(ECF NO. 1096)**