



# **FY2024 ANNUAL REPORT**



**BALTIMORE CITY  
POLICE ACCOUNTABILITY BOARD**

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*A message from*  
**CHAIR JOSH HARRIS**

POLICE ACCOUNTABILITY BOARD

I am honored to share with you the FY2024 Annual Report of the Police Accountability Board. This report is a testament to our commitment to transparency, fairness, accountability and community engagement. As Chair, it has been a privilege to work with our board members through this first year. The board has been tasked with representing and being a voice for many communities in our city in efforts to provide civilian oversight of law enforcement.

This release of our initial findings and recommendations underscores the importance of holding law enforcement accountable and fostering trust between the police and our diverse communities. This report delves into comprehensive reviews of incidents, systemic issues, and the implementation of accountability measures within the Baltimore City Police Department and other law enforcement agencies under our jurisdiction.

Through a meticulous examination, our board has strived to provide an unbiased assessment, recognizing both commendable practices and areas in need of improvement. The release of this report is a crucial step in our collective journey toward a more just and accountable law enforcement system that serves and protects every resident of Baltimore, regardless of their zip code.

We encourage open dialogue and invite the community, stakeholders, and law enforcement officials to engage with the report's findings. By fostering transparency and promoting collaboration, we aim to build a stronger foundation for a safer, more equitable Baltimore. Together, we can continue to work towards a law enforcement system that reflects the values and aspirations of our vibrant community.

In solidarity,  
Joshua S. D. Harris, Chair (FY2023-FY2024)



*A message from*  
**VICE-CHAIR JAMAL TURNER**

**POLICE ACCOUNTABILITY BOARD**

The Police Accountability Board is focused on advocating for transparency, fairness, and accountability in policing while serving as an independent voice for our community. Our work is essential not just for those who have been directly impacted by police misconduct, but for building the trust and integrity of law enforcement as a whole.

We must continue to be diligent, to listen to the voices of our community, and to ensure that every complaint, every concern, and every case is handled with the fairness and urgency it deserves.

As we reflect on 2024, we remain committed to the work of community oversight that results in actions taken and changes realized.

In 2025, as I assume the role of Chair, we will continue to build on the solid foundation of the PAB's first two years of work, collaborating with all partners to uncover and elevate solutions that our communities deserve.

Respectfully,  
Jamal Turner, Vice-Chair (FY2023-FY2024)  
Incoming Chair for FY2025



*A message from*  
**CHAIR TIERA HAWKES**

ADMINISTRATIVE CHARGING COMMITTEE

It is both an honor and a great responsibility to lead as the chairwoman of the Administrative Charging Committee (ACC). In this crucial role, we as a Committee recognize the profound importance of fostering genuine public safety. We acknowledge that police accountability and oversight are indispensable elements, contributing not only to transparency and public trust but also ensuring that our community feels secure in the knowledge that they are truly protected. Each week, the ACC meticulously adjudicates cases, upholding the principles of justice, fairness, and conducting comprehensive reviews to guarantee compliant, constitutional, respectful, and trustworthy public safety.

Respectfully,  
Tierra Hawkes, Chair



# POLICE ACCOUNTABILITY BOARD AT-A-GLANCE

## POLICE ACCOUNTABILITY BOARD MEMBERSHIP & COMMITTEES

### MEMBERSHIP

Joshua Harris, **Chair**  
Jamal Turner, **Vice-Chair**  
Stephanie Lee, **Secretary**

Mansur Abdul-Malik  
Ambassador Peter Bodde  
Marc S. Broady, Esq.  
Pastor Antoine Burton  
Dr. Janetta Gilmore  
Megan Kenny  
Harold Madison  
Lisa Nguyen  
Maraizu Onyenaka  
Jesmond O. Riggins, Esq.  
Dr. Doris Minor Terrell  
Bryan A. Upshur, Esq.  
Avi S. Wolasky, Esq.

### COMMITTEES



**DATA AND RESEARCH**  
Megan Kenny, Chair



**POLICY AND ADVICE**  
Jesmond O. Riggins, Esq., Chair



**APPOINTMENTS**  
Dr. Doris Minor Terrell, Chair



**COMMUNITY AND  
ORGANIZATIONAL  
ENGAGEMENT**  
Mansur Abdul-Malik, Chair



**POLICE EFFECTIVENESS**  
Dr. Janetta Gilmore, Chair



**BYLAWS**  
Marc S. Broady, Esq., Chair

# POLICE ACCOUNTABILITY BOARD AT-A-GLANCE

## FILING A POLICE MISCONDUCT COMPLAINT

### STEP 1: FILING

Citizens may file police misconduct complaints directly with the Police Accountability Board (PAB) or with the law enforcement agency.

### STEP 2: INVESTIGATION

The law enforcement agency (LEA) initiates and completes the investigation into the complaint. The investigation file is sent to the Administrative Charging Committee (ACC) once the investigation is complete.

### STEP 3: CHARGING

The ACC reviews the file and decides whether or not to administratively charge the officer. If the officer is charged, the ACC will recommend disciplinary measures based on the Maryland Statewide Police Disciplinary Matrix. These decisions are sent to the head of the LEA who provides the discipline determination to the officer. The head of the LEA can increase the discipline, but cannot reduce the discipline set by the ACC.

## FILE A POLICE MISCONDUCT COMPLAINT WITH THE PAB

### ONLINE PORTAL

Fill out the complaint form at:  
[civilrights.baltimorecity.gov/  
intake-form](https://civilrights.baltimorecity.gov/intake-form)



### EMAIL & PHONE

File complaints by e-mail to  
[pab@baltimorecity.gov](mailto:pab@baltimorecity.gov)  
and by phone at **410-396-3151**

### IN-PERSON

Visit the Police Accountability Board  
within the Office of Equity and Civil  
Rights at **7 E. Redwood Street, 9th  
Floor, Baltimore, MD 21202**

## STEP 4: RESOLUTION

Complaints are resolved in one of three ways.

### **Not Administratively Charged**

When the ACC finds there is not enough evidence to substantiate the allegations against an officer, the ACC will not administratively charge the officer and no discipline will be set.

### **Administratively Charged: Case Closed**

When the ACC finds there is enough evidence to substantiate the allegations against an officer, and the officer accepts the discipline imposed, the matter is considered final and closed.

### **Administratively Charged: Trial board and/or judicial review**

If an officer rejects the decision of the ACC, the case is referred to the trial boards. The trial board's decision is considered final unless the officer requests judicial review in Baltimore City Circuit Court.

## COMPLAINT PROCESS

- 1 FILE THE COMPLAINT**
- 2 COMPLAINT IS INVESTIGATED BY LEA**
- 3 ACC MAKES CHARGING DETERMINATION**
- 4 COMPLAINT IS RESOLVED**

Administratively Charged: Closed  
Administratively Charged: Trial board  
Not Administratively Charged



# POLICE ACCOUNTABILITY BOARD AT-A-GLANCE

## ENGAGING WITH THE POLICE ACCOUNTABILITY BOARD

### 4 WAYS TO *ENGAGE*

#### PUBLIC MEETINGS

The Police Accountability Board (PAB) holds public meetings on the first Monday of each month.

#### COMMUNITY ADVOCACY & EVENTS

The PAB actively participates in and contributes to community events and gatherings.

#### PUBLIC APPEARANCES

The members of the PAB welcome invitations to attend events and gatherings held by community groups and advocacy organizations. Board members are happy to share information about the Board, its work, and its members.

#### WEBSITE & EMAIL LIST

Visit the PAB's website to find agendas, meeting minutes, and other information about the Board's public meetings.

Join the PAB's email list to receive the latest updates, meeting schedules, and public engagement opportunities. Please email the Police Accountability Division (PAD) Office of Equity and Civil Rights (OECR) to be added to the email list at **[PAD.OECR@baltimorecity.gov](mailto:PAD.OECR@baltimorecity.gov)**.

# POLICE ACCOUNTABILITY BOARD AT-A-GLANCE

## HOW TO GET INVOLVED IN POLICE OVERSIGHT

In addition to getting involved with the work of the Police Accountability Board (PAB), there are many ways that civilians can become more involved with police oversight in Baltimore City.

### SERVING ON THE CIVILIAN TRIAL BOARDS

Trial boards occur when an officer rejects a disciplinary determination issued by the Administrative Charging Committee (ACC). The case will go to a trial board made up of an administrative law judge, an officer with the same rank as the accused officer, and a civilian. The PAB selects the civilian that serves on the board. Prior to serving on a trial board, civilians must attend training by the Maryland Police Training and Standards Committee (MPTSC).

#### APPLY ONLINE



Fill out the form to  
apply to serve on the  
Civilian Trial Boards at  
[tinyurl.com/CTBapply](https://tinyurl.com/CTBapply)

### SERVING ON THE POLICE ACCOUNTABILITY BOARD

The Baltimore Police Accountability Board (PAB) is made up of 17 members appointed by the Mayor and City Council. Two members are appointed by the Mayor, including one youth member between ages 18-25. Fifteen members are appointed by the City Council and approved and sworn in by the Mayor.

Members serve four-year terms and may serve no more than two consecutive terms. Members receive a stipend and are reimbursed for certain expenses.

There are currently three vacancies on the Board, one of which is the youth member. The PAB will work with the Mayor and City Council to advertise these opportunities to serve.

## **SERVING ON THE ADMINISTRATIVE CHARGING COMMITTEE (ACC)**

The Administrative Charging Committee's (ACC) five members include the Chair of the PAB or their designee from the PAB, two civilians appointed by the Mayor, and two civilians appointed by the PAB. Members must be residents of Baltimore City and serve three-year terms, including up to two consecutive terms. Members are expected to meet for one full day each week to review complaints and investigations and are compensated for their time. Members also attend an initial week-long training in preparation for their service on the Committee.

While the ACC currently does not have any vacancies, when vacancies arise, the PAB works to advertise the vacancy to the public, receive applications, and appoint an applicant to fill the vacancy.



# EXECUTIVE SUMMARY

In its second year in operation, Baltimore City's Police Accountability Board (PAB) has continued to build out the infrastructure that will ensure that public safety practices in Baltimore are transparent, accountable, and just, which in turn will build public trust in policing and foster a more effective public safety culture.

2024 has been a year of hard-won progress on policing matters in Baltimore, as the City continues to make steady progress to satisfy the requirements of the Consent Decree with the U.S. Department of Justice. However, much work remains to be done, and the PAB is proud to play a central role in police reform, civilian oversight on behalf of the public, and public awareness of policing matters.

Throughout 2024, the PAB has been engaged with Baltimore City, its law enforcement agencies, and the public, continuing to develop its role as the primary police oversight entity covering general policing matters, with a special role related to police discipline. The PAB works closely and effectively with the Administrative Charging Committee (ACC), building trust in Baltimore's policing system by ensuring the public has a voice in police discipline, and transparency in understanding instances of alleged misconduct and their resolution.

The PAB also has invested significant time and effort in professional development and training, both for board members and members of the public. These efforts, along with increased public awareness and outreach, are growing a culture of trust, engagement, and partnership.

The 2024 Annual Report of the PAB covers general information about the Board and police oversight in Baltimore City, key initiatives and Board activities for 2024, data analysis on current trends in Baltimore City policing, and policy recommendations going forward.

Of particular note, the PAB has focused attention on identifying zip codes and other regions of the city where police misconduct complaints are particularly frequent, types of misconduct complaints that are frequently filed, misconduct complaints involving multiple officers and multiple allegations, police response to cases involving mental health issues, policy on police diversions, body worn camera policy and compliance, and overall strategy for engaging and informing the public on policing matters.

Finally, throughout 2024 the PAB has continued to raise concerns relating to the quality of police data, which impacts its

## EXECUTIVE SUMMARY

ability to understand and communicate the true state of policing in Baltimore City. In addition, the PAB has considered questions of its own governance and independence within the public safety ecosystem. These conversations are ongoing.

# 2024 BY THE NUMBERS

### FY2024 BUDGET - OFFICE OF EQUITY AND CIVIL RIGHTS POLICE ACCOUNTABILITY DIVISION\*

SPEND CATEGORY	FY 24 BUDGET	FY 24 ACTUALS
01 - Salaries	\$1,686,193	\$861,003
02 - Other Personnel Costs	\$301,340	\$352,849
03 - Contractual	\$107,929	\$274,642
04 - Supplies & Materials	\$5,900	\$3,001
05 - Minor Equipment	\$34,000	\$1,054
06 - Major Equipment	\$10,000	\$6,481
<b>TOTAL</b>	<b>\$2,145,362</b>	<b>\$1,499,030</b>

\*Source: OECR

# HOW POLICE OVERSIGHT WORKS

Police oversight in Baltimore City is how citizens and law enforcement work together to ensure that public safety practices are transparent, accountable, and just.

Baltimore City's oversight framework is comprised of three entities: the Administrative Charging Committee (ACC), the Civilian Review Board (CRB), and the Police Accountability Board (PAB). Police oversight work is supported by the Police Accountability Division (PAD) of Baltimore

City's Office of Equity and Civil Rights (OECR). The PAD provides staff, funding, and resources to all the City's police oversight entities. Finally, the Maryland Police Training and Standards Commission (MPTSC) provides training and support to police oversight entities throughout Maryland, and provides the Maryland Statewide Police Disciplinary Matrix used to standardize disciplinary recommendations in cases of police misconduct.

## BALTIMORE CITY POLICE OVERSIGHT ENTITIES

**Police Accountability Board**

**Administrative Charging  
Committee**

**Civilian Review Board**

**Office of Equity and Civil  
Rights Police Accountability  
Division**

**Maryland Police Training and  
Standards Commission**

## WHAT DOES THE **POLICE ACCOUNTABILITY BOARD** DO?

The PAB is the primary entity providing comprehensive civilian oversight of policing in Baltimore City. It has oversight jurisdiction over the following law enforcement agencies operating in Baltimore City:

- Baltimore City Police Department
- Baltimore City School Police
- Baltimore City Sheriff's Office
- Baltimore City Environmental Police
- Johns Hopkins Police Department
- Police Force of Baltimore City Community College

POLICE ACCOUNTABILITY BOARD  
CORE RESPONSIBILTIES & JURISDICTION



**Receive Complaints**

Police misconduct complaints may be filed directly with the PAB.



**Strategic Engagement**

Conducts quarterly meetings with law enforcement leaders on behalf of the public.



**Civilian Appointments**

Appoints civilian members to the ACC and the trial boards on behalf of the public.



**Disciplinary Review**

Conducts quarterly examinations of disciplinary outcomes for misconduct complaints.



**Advise on Policing Matters**

Provides general input and recommendations on policing matters to the Mayor and City Council and the law enforcement agencies on behalf of the public.



**Transparency and Reporting**

The PAB provides data and analysis to the public to increase transparency.

POLICE ACCOUNTABILITY BOARD  
SCOPE OF JURISDICTION



Baltimore City  
Police Department



Baltimore City  
School Police



Baltimore City  
Sheriff's Office



Baltimore City  
Environmental  
Police



Johns Hopkins  
Police Department



Police Force of  
Baltimore City  
Community College

# HOW POLICE OVERSIGHT WORKS

## ADMINISTRATIVE CHARGING COMMITTEE

### WHAT DOES THE ADMINISTRATIVE CHARGING COMMITTEE DO?

The Administrative Charging Committee (ACC) gives the public a role in police officer discipline. Law enforcement agencies (LEA) investigate complaints of police misconduct, but after the investigation, it's the ACC that decides whether an officer should be administratively charged or not. If the officer is administratively charged by the ACC, the ACC will also recommend disciplinary action.

### MEMBERSHIP

The ACC is made up of five members, including the chair of the PAB or their designee, two civilians appointed by the PAB, and two civilians appointed and sworn in by the Mayor. The current members of the ACC are:

Tiera Hawkes, Esq., **Chair** (PAB appointee)  
Jesmond O. Riggins, Esq. (PAB Chair Designee)  
Ray Kelly (PAB appointee)  
David Cramer (Mayoral appointee)  
Kimberly Rogers (Mayoral appointee)

### CORE RESPONSIBILITIES OF THE ADMINISTRATIVE CHARGING COMMITTEE



**Review Investigative Outcomes.** The ACC reviews the investigation files for each complaint of misconduct. A single complaint may cover multiple officers and allegations.



**Evaluating Evidence.** The ACC reviews the evidence from the investigatory file to determine if the officer should be administratively charged or not. If additional information is needed to support its work, the ACC may request it from the law enforcement agency.



**Determining Charges.** Once the review is complete, the ACC determines whether an officer accused of misconduct should be administratively charged.



**Recommending Discipline.** If the ACC determines an officer should be administratively charged, it will use the Maryland Statewide Police Disciplinary Matrix and the disciplinary record of the officer to recommend appropriate discipline.



**Issue Findings.** The ACC reports its findings in writing to the law enforcement agency, the complainant(s), and the PAB.

# HOW POLICE OVERSIGHT WORKS

## CIVILIAN REVIEW BOARD

### WHAT DOES THE CIVILIAN REVIEW BOARD DO?

The Civilian Review Board (CRB) is Baltimore's original police oversight body created in 1999. By contrast to the PAB and ACC, the CRB has the authority to conduct independent investigations of police misconduct complaints. Another key difference is that the CRB focuses only on five specific kinds of police misconduct complaints: excessive force, abusive language, harassment, false arrest, and false imprisonment. The CRB also reviews Baltimore City Police Department (BPD) policies and procedures and makes recommendations to the Commissioner. As of January 1, 2025, the CRB is no longer active. However, the PAB recommends that legislation be passed providing the investigatory and subpoena authority formerly held by the CRB to the PAB.

### OFFICE OF EQUITY AND CIVIL RIGHTS POLICE ACCOUNTABILITY DIVISION

The Office of Equity and Civil Rights (OECR) is a city agency with a mission to eliminate inequity, inequality, and discrimination. Through its Police Accountability Division (PAD), the OECR supports all of Baltimore City's oversight entities - the PAB, ACC, and CRB - by providing staffing, funding, and other support.

Key areas of support include:

- Administrative and Logistical Support
- Investigative and Adjudicative Assistance
- Data Analysis and Reporting
- Community Engagement and Advocacy

### MARYLAND POLICE TRAINING AND STANDARDS COMMISSION

The Maryland Police Training and Standards Commission (MPTSC) is a body established in statute by the Maryland legislature to govern police certification and training across Maryland.

The MPTSC is responsible for developing the Maryland Statewide Police Disciplinary Matrix, a required framework used by the ACC to recommend discipline in the event that an officer is administratively charged.



The MPTSC also provides training on police matters, including training for the members of the PAB, ACC, and for civilians serving on trial boards.

# 2024 YEAR IN REVIEW

In its second year of operation, the PAB has continued to work to ensure that public safety practices in Baltimore City are transparent, accountable, and just.

## PROFESSIONAL DEVELOPMENT

In 2024, the PAB was actively involved in several key events focused on police accountability, including the Police Executive Research Forum and the National Association for Civilian Oversight of Law Enforcement (NACOLE) conference. These events provide valuable opportunities for learning and sharing best practices. The Board received a series of 3 trainings by Brian Corr, the former president of NACOLE, which provided an overview on the challenges and guiding principles of civilian oversight. The Board also received equity training administered by the Mayor's Office of Equity and Civil Rights (OECR).

## MAKING CONNECTIONS

By establishing direct communication with other police accountability boards, such as those in Dallas/Fort Worth, TX and Arlington, VA, the PAB enhances its ability to share information and strategies, improving the speed and quality of proposed policies and community engagement efforts.

## CIVIL RIGHTS WEEK

A highlight of 2024 was PAB's active participation in Baltimore's Civil Rights Week collaborating with the OECR to maintain presence during events. This initiative enables citizens to interact with the board and engage in meaningful discussions about civil rights and police accountability. During Civil Rights Week, the PAB held a panel event dedicated to providing context to the evolution of civilian oversight in Baltimore City. Each chair of the ACC, PAB, and CRB were panelists, and the conversation was moderated by Jeff Johnson.

## 2024 PAB COMMITTEE WORK

**Appointments Committee.** The Appointments Committee, chaired by Dr. Doris Minor Terrell, oversees civilian appointments to trial boards, which are convened when an officer contests disciplinary actions. By including civilians in trial boards, the public gains a voice in police discipline, which helps to build trust that outcomes are just.

In 2024, the Appointments Committee worked to make the application process to serve on the ACC and the trial boards more inclusive, accessible, and to increase public awareness of these opportunities.

**Bylaws Committee.** The Bylaws Committee, chaired by Marc S. Broady, Esq., drafts and amends the bylaws which determine the governance structure of the PAB. In 2024, the Bylaws Committee continued to finalize the PAB's bylaws while identifying opportunities to improve the board's structure via legislative changes. Final bylaws are set to be approved [ ].

**Community Organization and Engagement Committee.** The Community Organization and Engagement Committee, chaired by Mansur Abdul-Malik, works to strengthen the ties between the public and the PAB by enhancing access to PAB, OECR, and police accountability initiatives generally. The Community Organization and Engagement Committee also works to build relationships with police accountability organizations nationwide.

In 2024, the PAB held quarterly in-person meetings strategically located in areas with higher concentrations of police misconduct complaints. This effort ensures that community members can voice concerns, submit complaints, and engage directly with board members and support staff.

**Data and Research Committee.** The Data and Research Committee, chaired by Megan Kenny, is at the forefront of employing data-driven approaches to address police misconduct. By analyzing raw data from law enforcement agencies and OECR, the committee enhances PAB's capacity to understand and address issues of police misconduct comprehensively. The

Committee's 2024 *Data and Trends Report* is included in this annual report starting on page 18.

**Police Effectiveness.** The Police Effectiveness Committee, chaired by Dr. Janetta Gilmore, is tasked with understanding if the Baltimore City Police Department is effectively utilizing current policies and procedures to meet specified goals of having more positive interactions with the community they serve. Through in-depth analysis of current and pending policies, the goal is to gauge how police effectiveness is measured; determine what strategies are or are not working; and identify the process to create more effective ways to police. The lifecycle of a policy is monitored from draft to approval with input offered during the public comment session. This Committee's work is the basis for yielding sustainable results that lead to building stronger relationships with the community.

**Policy and Advice Committee.** The Policy and Advice Committee, chaired by Jesmond O. Riggins, Esq., develops policy recommendations aimed at reforming police practices and improving police accountability. The Committee's work culminates in overseeing and guiding the drafting of the annual report, which outlines key recommendations for elected officials and stakeholders at the state and local levels. The Committee's *Policy Recommendations Report* is included in this annual report starting on page 32.

# COMPLAINT DATA & TRENDS

The following analysis on police misconduct complaints in Baltimore City identifies a number of relevant trends. In Baltimore City, police misconduct complaints, or “cases,” are assigned to one or more police oversight entities by law. The Police Accountability Board (PAB) receives all complaints of police misconduct that involve the public or a member of the public. The Civilian Review Board (CRB) by contrast only receives complaints dealing with specific types of allegations, which are investigated via a separate process utilizing independent investigators appointed by the CRB. This analysis deals only with data on complaints received by the PAB, which are investigated by the appropriate law enforcement agency (LEA) who then submits the investigation file to the ACC for a charging determination.

Police misconduct complaints are accepted by the PAB and the LEAs without regard to completeness. Any gaps in information are filled in during the investigation to the extent possible. Complainant demographic data is not collected at any point, so this analysis will not consider complainant demographics.

The Baltimore City LEAs noted throughout this analysis are the Baltimore Police Department, the Police Force of Baltimore City Community College, Baltimore City

School Police, Baltimore City Sheriff’s Office, Baltimore City Environmental Police, and Johns Hopkins Police Department.

The following analysis is separated into sections for ease of review. Section I analyzes available quantitative data on complaints, including number of complaints received, how they were forwarded to PAB, their status, and where they occurred. Section II analyzes quantitative data on the allegations within those complaints. Section III reports trends in officer data. Section IV contains a comment on data integrity; and Section V contains policy recommendations related to data practices.

The definitions of terms used throughout this analysis are included as an appendix to the annual report. Unless otherwise noted, these should be referenced when interpreting this analysis.

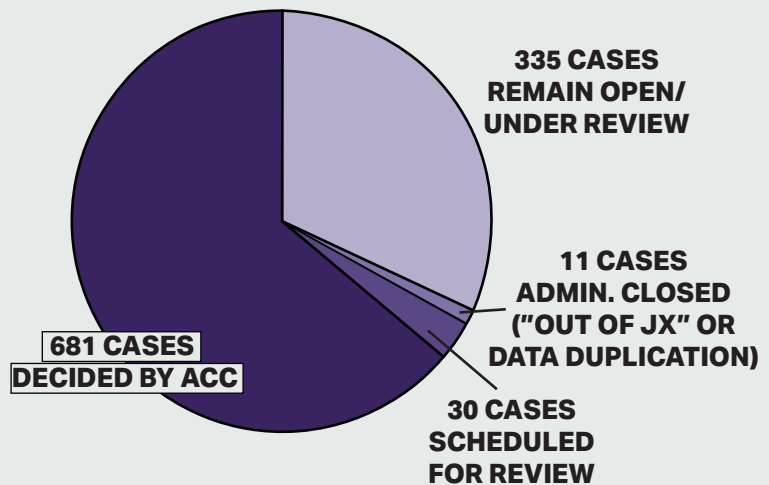
### KEY INSIGHTS FOR FY 2024

**1,057**

**TOTAL 2024 POLICE  
MISCONDUCT CASES  
RECEIVED BY PAB**

**↑ 43%**

**INCREASE OVER FY 2023**



**681**

**TOTAL ACC  
DECISIONS IN 2024**

**460**

**RESULTED IN  
ADMINISTRATIVE  
CHARGES**

**221**

**DID NOT RESULT IN  
ADMINISTRATIVE  
CHARGES**

**98.2%**

**OF CASES INVOLVED  
BALTIMORE POLICE  
DEPARTMENT OFFICERS**

**354**

**CLOSED CASES FILED  
FROM WITHIN LEA**

**88**

**DIFFERENT TYPES OF  
ALLEGATIONS**

#### **MOST FREQUENT ALLEGATIONS**

- 1** **NEGLECT OF DUTY**
- 2** **FAILURE TO OPERATE  
BODY-WORN CAMERA  
(BWC) AS REQUIRED**
- 3** **FORCE OUT OF POLICY**

# COMPLAINT DATA & TRENDS

## SECTION I: QUALITATIVE DATA POLICE ACCOUNTABILITY DIVISION COMPLAINTS

The data below are separated by fiscal year to align with the budget cycle. In Fiscal Year 2023 (FY23), 739 cases were received by PAB across all of the law enforcement agencies (LEAs). That count increased by 318 cases in Fiscal Year 2024 (FY24) for a total of 1,057 cases. This increase does not necessarily reflect a change in sworn officer behavior. It could also be because of increased outreach efforts by OECR, expanded publicity of the police misconduct complaint process, increased willingness among LEA personnel to use the police misconduct complaint process, or the existence of the Police Accountability Board (PAB), Administrative Charging Committee (ACC), and the Civilian Review Board (CRB).

Table 1 reflects the police misconduct complaint count for each LEA in the past two fiscal years and includes cases currently open and scheduled for ACC review.

TABLE 1: TOTAL CASES RECEIVED

LAW ENFORCEMENT AGENCY	FY23	FY24	No. Cases Change	FY23 % of total	FY24 % of total	% change
Baltimore Police Department	732	1,038	306	99.1%	98.2%	-0.9
Baltimore Sheriff’s Office	4	11	7	0.5%	1.0%	0.5
Baltimore City School Police	3	7	4	0.4%	0.7%	0.3
Baltimore Environmental Police	0	1	1	0%	0.1%	0.1
Baltimore City Community College	0	0	0	0%	0%	-
Johns Hopkins Police Department	0	0	0	0%	0%	-
GRAND TOTAL	739	1,057	318	100%	100%	-

# SECTION I: QUALITATIVE DATA

## POLICE ACCOUNTABILITY DIVISION COMPLAINTS

### CASE STATUS

The current statutory deadline for closing a case is one year and one day from the complaint filed date. Because of this timeline, many cases filed in one fiscal year will not close until the next fiscal year. The analysis below sorts cases by the fiscal year in which they closed, unless otherwise noted. Cases that are open or scheduled for ACC review are reported in a fiscal year if they had that status at the end of the fiscal year.

Table 2 illustrates the current status of all the cases that were received by PAB separated by their current status and by fiscal year.

### HOW THE PAB RECEIVED CASES IN 2024

Maryland law provides that any individual may submit a complaint of police misconduct to the involved officers' LEA or to the PAB. Complaints received by the officers' LEA are then forwarded to the PAB. Complaints are further sorted by whether or not the complainant is a civilian external to any LEA (external complaints) or sworn or civilian personnel of an LEA (internal complaints).

### FORWARDED BY AGENCY - EXTERNAL

From FY23 to FY24 there was a decrease in the number of complaints, or "cases," submitted by individuals external to LEAs. Without further data and analysis, it is difficult to determine the cause for this decrease.

**TABLE 2: CURRENT STATUS OF CASES**

CURRENT STATUS	FY23	FY24	FY23 % of total	FY24 % of total	% change
Administratively Closed	66	11	8.9%	1.0%	-7.9
Closed: Administratively Charged	220	460	29.8%	43.5%	13.7
Closed: Not Administratively Charged	333	221	45.0%	20.9%	-24.1
Open	120	335	16.2%	31.7%	15.5
Scheduled for ACC Review	-	30	0	2.8%	2.8
<b>GRAND TOTAL</b>	739	1,057	100%	100%	-

## SECTION I: QUALITATIVE DATA

### POLICE ACCOUNTABILITY DIVISION COMPLAINTS

Possibilities include: (1) the decrease could be due to members of the public being unaware of their options to submit a complaint to the responding officers' LEA, (2) a lack of trust in the complaint filing process, or (3) police misconduct has actually decreased.

#### FORWARDED BY AGENCY - INTERNAL

From FY23 to FY24 there was a significant increase in the number of complaints submitted by sworn or civilian personnel of the LEAs. As with the external complaints, it is difficult to determine the cause for the increase in internal complaints without additional data and analysis.

Possibilities include: (1) the increase could be due to LEA personnel becoming more familiar with the complaint process, (2) there could be a culture change where LEA personnel are becoming more comfortable with filing a complaint, (3) LEA personnel

are learning to better recognize instances of police misconduct, or (4) there has been an increase in police misconduct.

Table 3 illustrates the case intake types of all closed cases received by PAB by the fiscal year in which the case was received.

#### WHERE INCIDENTS ARE OCCURING (PART 1)

As part of the analysis, aggregate location data for the complaints were reviewed. For Part 1, zip codes where incidents occurred were analyzed based on the fiscal year they were received by PAB.

The incidents that prompted a police misconduct complaint spanned at least 28 zip codes and three states: Maryland, New York, and Pennsylvania. Incidents occurring outside Baltimore City or outside of Maryland involve allegations against law enforcement officers for conduct occurring in those locations.

**TABLE 3: CASE INTAKE TYPE OF CLOSED CASES**

CURRENT STATUS	FY23	FY24	# Change	FY23 % of total	FY24 % of total	% change
Forwarded by Agency - Internal	45	351	306	7.3%	51.5%	44.2
Forwarded by Agency - External	548	317	-231	88.7%	46.5%	-42.2
PAB Intake	21	7	-14	3.4%	1.0%	-2.4
Unknown	4	6	2	0.6%	0.9%	0.3
<b>GRAND TOTAL</b>	618	681	63	100%	100%	-

NOTE: Case intake type "PAB Intake" is considered to be an external complaint but is counted separately in Table 3.

SECTION I: QUALITATIVE DATA  
POLICE ACCOUNTABILITY DIVISION COMPLAINTS

Of the incident locations involving the 28 Baltimore City zip codes, 57% (16) saw a slight decrease in the number of police misconduct cases received by PAB from FY23 to FY24. For FY24, the Baltimore City zip code with the most incidents was 21202. Zip code 21202 had 76 incidents in FY24, up 2.3% from FY23 when there were 55 incidents. The zip code with the second most incidents was 21215, with 54 incidents, down from 57 incidents in FY23. Three zip codes were tied for the third most incidents in FY24 with 51: 21201, 21213, and 21223.

Table 4 illustrates the top ten (10) zip codes of cases received by PAB, by the fiscal year in which they were received including the percentage of the total for the fiscal year

and the percentage point change.

For clarification, cases counted as “Out of Jurisdiction” are cases identified to be outside of the jurisdiction of Baltimore City law enforcement due to where the incident of alleged misconduct occurred.

TABLE 4: TOP 10 INCIDENT ZIP CODES OF CLOSED CASES

ZIP CODES OF CLOSED CASES	FY23	FY24	# Change	FY23 % of total	FY24 % of total	% change
21202	55	76	21	8.9%	11.1%	2.2
21215	57	54	-3	9.2%	7.9%	-1.3
21201	39	51	12	6.3%	7.4%	1.1
21213	31	51	20	5.0%	7.4%	2.4
21223	39	51	12	6.3%	7.4%	1.1
21217	49	49	0	7.9%	7.1%	-0.8
21218	41	45	4	6.6%	6.6%	-
21224	34	38	4	5.5%	5.5%	-
Out of Jurisdiction	9	27	18	1.5%	4.0%	2.5
21206	25	26	1	4.0%	3.8%	-0.2
22 remaining zip codes/locations	239	213	-26	38.7%	31.3%	-7.4
GRAND TOTAL	618	681	63	100%	100%	-

## SECTION I: QUALITATIVE DATA

### POLICE ACCOUNTABILITY DIVISION COMPLAINTS

#### WHERE INCIDENTS ARE OCCURING (PART 2)

For Part 2 of the location analysis, police misconduct case data was analyzed by the Baltimore City Police Department police district where the cases occurred.

As was true in FY23, the Central District had the most cases with 121 cases. The Central District also had the highest percentage increase from FY23 to FY24. The district with the second highest number of cases in FY24 was the Eastern District with 73 cases, a 33% increase from FY23. The Southern District had the most significant decrease in cases with a 1.9% decrease.

Table 5 reports the number of closed cases by police district and fiscal year.

For clarification, "Out of Jurisdiction" means cases identified to have occurred outside of Baltimore City law enforcement jurisdiction. "Multiple Locations per Case" are cases where there were multiple locations for a single case. "No Zip Code" means cases where the incident occurred through social media or other electronic means. "Unknown Location" means cases where the location of the incident is unknown.

**TABLE 5: INCIDENT POLICE DISTRICTS OF CLOSED CASES**

POLICE DISTRICT	FY23	FY24	# Change	FY23 % of total	FY24 % of total	% change
Central District	97	121	24	15.7%	17.8%	2.1
Eastern District	55	73	18	8.9%	10.7%	1.8
Northeastern District	64	61	-3	10.4%	9.0%	-1.4
Northern District	54	57	3	8.7%	8.4%	-0.3
Northwestern District	44	42	-2	7.1%	6.2%	-0.9
Southeastern District	58	68	10	9.4%	10.0%	0.6
Southern District	59	52	-7	9.5%	7.6%	-1.9
Southwestern District	56	66	10	9.1%	9.7%	0.6
Western District	73	70	-3	11.8%	10.3%	-1.5
Out of Jurisdiction	13	27	14	2.1%	4.0%	1.9
Multiple Districts per Case	0	8	8	0%	1.2%	1.2
No District	20	24	4	3.2%	3.5%	0.3
Unknown District	25	12	-13	4.0%	1.8%	-2.2
<b>GRAND TOTAL</b>	618	681	63	100%	100%	-

# COMPLAINT DATA & TRENDS

## SECTION II: QUANTITATIVE DATA ALLEGATIONS

A police misconduct case contains a minimum of one allegation. However, a case could involve multiple allegations. It sometimes happens that additional allegations are added while the law enforcement agency (LEA) is conducting their investigation. It is also possible that the Administrative Charging Committee (ACC) recognizes misconduct during its review and adds allegations at that stage, along with disciplinary recommendations. For these reasons, the number of total allegations in a given year will exceed the number of cases for that year.

Allegations may include subcategories such as criminal misconduct, neglect of duty, and preventable departmental accident. It is possible that allegations listed for police officers do not include a subcategory. For example, a case could have one officer with an allegation of "Neglect of Duty," while another police officer for the same case has an allegation of "Neglect of Duty - Failure to Intervene." For the purposes of this analysis, the allegation totals for "Criminal Misconduct," "Neglect of Duty," and "Preventable Departmental Accident," are grouped by those subcategories.

In Fiscal Year 2024 (FY24), there were 88 different types of allegations represented in complaints, which is 58% more than in FY23. The total number of allegations across all closed cases also increased by

14% in FY24. "Neglect of Duty" was the most frequent allegation type for FY24. Neglect of duty is when a police officer fails to perform an assigned duty or to exercise reasonable discretion. "Failure to Operate Body-Worn Camera (BWC) as Required" was the second most frequent allegation for FY24, and "Force Out of Policy" was the third most frequent allegation. (See Appendix for definitions of allegation types).

On the following page, Table 6 reports the top ten (10) most frequent allegations against police officers across closed cases separated by fiscal year.

## SECTION II: QUANTITATIVE DATA

### ALLEGATIONS

**TABLE 6: TOP 10 ALLEGATIONS AGAINST POLICE OFFICERS (CLOSED CASES)**

TOP 10 ALLEGATIONS	FY23	FY24	# Change	FY23 % of total	FY24 % of total	% change
Neglect of Duty	387	364	-23	25.4%	20.9%	-4.5
Failure to Operate BWC as Required	207	337	130	13.6%	19.4%	5.8
Force Out of Policy	81	169	88	5.3%	9.7%	4.4
Conduct Unbecoming of a Police Officer/Employee	208	153	-55	13.6%	8.8%	-4.8
Preventable Departmental Accident	0	135	135	0%	7.8%	7.8
Inappropriate Comments and/or Gesture(s)	31	56	25	2.0%	3.2%	1.2
Discourtesy	81	54	-27	5.3%	3.1%	-2.2
Harassment	53	50	-3	3.5%	2.9%	-0.6
Failure to Report Use of Force	11	47	36	0.7%	2.7%	2.0
Criminal Misconduct	81	45	-36	5.3%	2.6%	-2.7
78 other allegations	386	330	-56	25.3%	19.0%	-6.3
<b>GRAND TOTAL</b>	1,526	1,740	214	100%	100%	-

# COMPLAINT DATA & TRENDS

## SECTION III: QUANTITATIVE DATA OFFICERS

A police misconduct case must reference at least one police officer, but could also reference multiple police officers. Because of this, the number of cases and the number of individual police officers referenced in cases will not usually be the same.

Each law enforcement agency has unique identifiers for each of their officers called Sequence IDs. These Sequence IDs are like employee numbers or social security numbers; each is unique to the officer and does not change throughout their career at the assigning law enforcement agency (LEA). The use of the Sequence ID for police officers helps to avoid errors for officers with the same or similar names.

Based on the data in the Baltimore City Budget Publications, the BPD employed an

estimated 2,610 sworn personnel in Fiscal Year 2023 (FY23) and 2,609 sworn personnel in Fiscal Year 2024 (FY24). This includes all sworn personnel of all department divisions and units.

In FY24 there were 687 unique Sequence IDs with police misconduct allegations. The average number of allegations made against the 687 unique Sequence IDs is 3.8. The Sequence IDs with the highest numbers of allegations in FY23 were not the same Sequence IDs of those with the highest number of allegations in FY24.

Table 7 illustrates the total number of unique Sequence ID numbers of closed cases by fiscal year and the total number of sworn personnel at the BPD.

**TABLE 7: UNIQUE SEQUENCE IDS OF CLOSED CASES (FY24)**

	# UNIQUE SEQUENCE IDS	ESTIMATED # SWORN PERSONNEL	% OF TOTAL
<b>FY23</b>	607	2,610	23.3%
<b>FY24</b>	687	2,609	26.3%

# COMPLAINT DATA & TRENDS

## SECTION IV: THE STATE OF THE DATA

An analysis is only as good as the data from which it is derived. Clean and complete data are essential. As it stands today, the road to clean, accurate, and timely criminal justice data continues to be long and winding, including the Baltimore City data reviewed for this analysis. Data collection, management, and analysis is both an art and a science. The ability to quantify data is not a talent that everyone possesses, but the results are relied on by those with the power to make systemic change. When the data is used in its full and truest form, it can make the difference in supporting large and lasting changes. Data can be powerful, but it should not be cherry-picked, siloed, incomplete, and undefined.

Today, the state of the data is still developing and has a long way to go. The data collection and data management processes outside of law enforcement agencies (LEAs) pose barriers to the accountability process. Currently, there is no standard operating procedure for data collection, entry, or management within Baltimore City's offices and agencies. As a consequence of this, not all of the data provided by law enforcement agencies are consistent, and the offices relying on them routinely find that they are incomplete.

# COMPLAINT DATA & TRENDS

## SECTION V: RECOMMENDATIONS

### RECOMMENDATION 1

### EQUITABLE AND ACCESSIBLE POLICE MISCONDUCT FILE SHARING

#### IMPLEMENTING ENTITIES

All covered LEAs, OPD, SAO, and PAB

All Baltimore City law enforcement agencies (LEAs) should establish equitable police misconduct file/data sharing practices with the Baltimore City Police Accountability Board (PAB) and the agencies participating in any criminal justice activities post-arrest, namely the Office of the Public Defender (OPD) and the Baltimore City State’s Attorney’s Office (BCSAO). These practices should include:

- The OPD receives the exact same police misconduct files as those shared with the BCSAO. This equitable approach will further ensure that those facing trial in Baltimore City have their Constitutional rights protected. This initiative is essential for enhancing transparency, building public trust, and ensuring that the Constitutional rights of defendants in the criminal justice system are protected.
- The data shared by the Baltimore Police Department (BPD) to the public and to other government agencies like the Consent Decree Team and Open Baltimore must be consistent. The current inconsistencies without explanation create a distrust where none has to exist. A publication of accurate data across agencies will increase public trust and allow for more efficient, targeted practices and policies to be developed by the City and LEAs.

RECOMMENDATION 2

REGULARLY SHARE ACCURATE  
ROSTERS OF SWORN LAW  
ENFORCEMENT OFFICERS

IMPLEMENTING ENTITIES

All covered LEAs, OECR PAD

LEAs should routinely provide the Office of Equity and Civil Rights (OECR) Police Accountability Division (PAD) with accurate rosters of sworn members of each agency, to include first name, last name, Sequence IDs, and assignments to any specialized unit like District Action Team, the Mobile Metro Unit, etc. In the pursuit of transparency from LEAs, an understanding of the sworn officers currently working for the agency is paramount. Knowing more about an officer’s specialized assignment would allow the PAB to more accurately pinpoint areas of concern, and then do the work to bring it forward and pursue meaningful change and accountability.

RECOMMENDATION 3

ESTABLISH QUARTERLY DATA  
VERIFICATION PROCESS

IMPLEMENTING ENTITIES

All covered LEAs, OECR PAD

The OECR PAD and all covered LEAs should establish a quarterly data verification process to be completed by the end of the first month of the following quarter. In other words, Q1 data (July, August, and September) must be verified by October 31, Q2 by January 31, Q3 by April 30, Q4 by July 31.

The data to be verified includes, but is not limited to: every case number, every officer associated with every case number, every allegation for every officer in each and every case, the Sequence ID of each officer, the zip code of incidents for all complaints, and the district in which each incident occurred.

The implementation plan should require that each LEA submit to PAD one CSV file of all cases sent the previous quarter. This CSV file is an export from IAPro and should be a routine summary report already existing in the software.

### RECOMMENDATION 4

#### ESTABLISH INTERNAL DATA VERIFICATION PROCESS AT OECR PAD

##### IMPLEMENTING ENTITIES

OECR PAD

The OECR PAD should establish a monthly internal data verification process to ensure no one case is duplicated and that all information provided by the LEAs is entered into the system accurately. Verification must include reviewing any duplicate PIB number, case summary, and responding officers.

A challenge that has arisen through the implementation of the police accountability process is that the PAD has received a duplication and triplication of cases from law enforcement agencies. Naturally, this has created a duplication and triplication of cases in the internal system used by PAD to track police misconduct cases received by LEAs. As a result, it made the data analysis for this report significantly more cumbersome and taxing. It is critical to this process and future data analysis that this is corrected.



# POLICY RECOMMENDATIONS

## LEGISLATIVE RECOMMENDATIONS

### RECOMMENDATION 1

#### INVESTIGATIVE AND SUBPOENA POWERS FOR THE PAB

##### IMPLEMENTING ENTITIES

Maryland General Assembly,  
Baltimore City Council

The Maryland General Assembly should pass authorizing legislation enabling Baltimore City to grant the Police Accountability Board (PAB) investigative and subpoena powers, restoring the loss of independent, civilian-led investigations into alleged misconduct of Baltimore Police Department (BPD) officers resulting from the Civilian Review Board's dissolution on January 1, 2025.

The Baltimore City Council should then pass legislation granting the PAB investigative and subpoena powers.

### RECOMMENDATION 2

#### GRANT PAB INVESTIGATIVE JURISDICTION OVER PUBLIC POLICE MISCONDUCT COMPLAINTS

##### IMPLEMENTING ENTITIES

Baltimore City Council

Upon passage of enabling legislation by the Maryland General Assembly granting PAB investigative powers, the Baltimore City Council should pass legislation dividing investigative jurisdiction between the PAB (public) and BPD (internal). The legislation should grant PAB exclusive authority ("original jurisdiction") to investigate public complaints alleging BPD misconduct allegations, while BPD would continue to have exclusive authority over non-public misconduct allegations. This division of jurisdiction will not only improve the timeliness and quality of investigations but substantially enhance BPD's ability to fully and effectively comply with state or locally mandated timelines.

RECOMMENDATION 3

EXPAND THE ACC TO NINE MEMBERS FROM FIVE

IMPLEMENTING ENTITIES

Maryland General Assembly,  
Baltimore City Council

The Maryland General Assembly should pass legislation authorizing local jurisdictions to expand the number of administrative charging committee members from five to nine.

Upon passage of the enabling legislation, the Baltimore City Council should pass legislation increasing the ACC’s membership from five to nine members, of which one (1) is the PAB chair or designee, four (4) are PAB appointees, and four (4) are Mayoral appointees. This change will increase the ACC’s capacity to timely and effectively adjudicate its substantial caseload, which is the largest in the state.

RECOMMENDATION 4

CHANGE PAB ANNUAL REPORT DUE DATE

IMPLEMENTING ENTITIES

Maryland General Assembly,  
Baltimore City Council

The Maryland General Assembly should pass legislation authorizing Baltimore City Council to change the PAB report due date. Upon passage of that legislation, the Baltimore City Council should pass legislation changing the due date from the end of the calendar year (December 31) to the start of the fiscal year (July 1). This will avoid end-of-year holiday scheduling conflicts and allow for clear budgetary reporting as the date aligns with the City’s budget cycle.

LEGISLATIVE RECOMMENDATIONS

RECOMMENDATION 5

REQUIRE DETAILED BUDGET  
INFORMATION IN PAB ANNUAL REPORTS

IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend Baltimore City Code, Article 1, § 11-8(a) to require PAB annual reports to include detailed analysis of its current fiscal year budget and longitudinal analyses of its funding and staffing history. This will promote accountability for resource allocation and highlight the impact of underfunding or understaffing. The analysis must clearly demonstrate a link between OECR’s individual expenditures and its support for PAB and ACC in fulfilling their responsibilities.

RECOMMENDATION 6

QUARTERLY BUDGET REPORTS  
SUBMITTED TO PAB

IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend Baltimore City Code, Article 1, § 11-12(b) to require the Mayor’s Office of Equity and Civil Rights to submit quarterly budgetary reports to PAB detailing the allocation and expenditure of funds designated for PAB and ACC, including staffing costs, operational expenses, and other resource allocations and expenses. This will enhance accountability, ensure that resources are used effectively, and promote fiscal transparency, allowing the PAB to better understand its financial position, advocate for necessary funding, and align its operations with its priorities.

RECOMMENDATION 7

CLARIFY ROLE OF DIRECTOR  
OF OECR IN THE PAB

IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend the Baltimore City Code, Article 1, § 11-12(a) to change the description of the Director of the Mayor’s Office of Equity and Civil Rights (OECR) from serving as the director “of” the PAB to serving as the director “for” the PAB. This amendment will clarify that the Director’s role in relation to the PAB is to provide administrative, logistical, and operational support for the Board without implying authority over it.

### RECOMMENDATION 8

#### CLARIFY DIRECTOR'S DUTY TO "ASSIST" THE PAB

##### IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend the Baltimore City Code, Article 1, § 11-12(a) to clarify that PAB serves as the primary oversight body and that the role of the Director of OECR is to provide supportive administrative, logistical, and operational assistance. The amendment should ensure that the Director's responsibilities complement, not oppose, the Board's authority, reinforcing PAB's independence while fostering effective collaboration. This clarification will help delineate roles, prevent potential misunderstandings and conflicts, and support PAB's mission of police accountability and oversight.

### RECOMMENDATION 9

#### CLARIFY DIRECTOR'S DUTY TO "CONSULT" THE PAB ON STAFF ASSIGNMENTS

##### IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend the Baltimore City Code, Article 1, § 11-12(b) to clarify what it means for the Director of the OECR to "consult" PAB when assigning staff to assist the Board. The amendment should specify that consultation includes eliciting input from PAB regarding its staffing needs, considering the Board's preferences for specific qualifications and experience, and providing opportunities for the Board to review and offer feedback on proposed assignments before final decisions are made. This clarification will ensure that staff assignments align with the PAB's operational requirements while fostering collaborative decision-making and reinforcing the Board's oversight role.

# LEGISLATIVE RECOMMENDATIONS

## RECOMMENDATION 10

### REMOVE OECR DIRECTOR'S DISCRETION TO SPEND BOARD FUNDS

#### IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend Baltimore City Code, Article 1, § 11-12(c) to require the Director of OECR to expend funds authorized in the Ordinance of Estimates or any supplementary appropriations for PAB. Currently, the Director has discretion to expend funds in support of the Board.

## RECOMMENDATION 11

### REMOVE DIRECTOR'S DISCRETION TO ASSIGN STAFF TO ASSIST THE BOARD

#### IMPLEMENTING ENTITIES

Baltimore City Council

The Baltimore City Council should amend Baltimore City Code, Article 1, § 11-12(b) to require the Director of the Mayor's Office of Equity and Civil Rights to assign staff to assist PAB and ACC. Currently the Director has discretion to assign staff.



# POLICY RECOMMENDATIONS

## EXECUTIVE ACTION RECOMMENDATIONS

### RECOMMENDATION 1

#### MODIFY THE CONSENT DECREE TO INCLUDE PAB AND ACC

##### IMPLEMENTING ENTITIES

Baltimore City Mayor

Seek a modification of the federal Consent Decree to include the Police Accountability Board (PAB) and the Administrative Charging Committee (ACC), ensuring alignment with state and local law following the dissolution of the Civilian Review Board (CRB) on January 1, 2025.

### RECOMMENDATION 2

#### REQUEST FUNDING FOR DEVELOPING PAB BYLAWS, POLICIES, AND PROCEDURES

##### IMPLEMENTING ENTITIES

OECR

The Office of Equity and Civil Rights (OECR) should include a funding request for the PAB in the Fiscal Year 2026 (FY26) budget to hire a third party to assist in completing the Board’s bylaws and documenting policies and procedures for both the PAB and the ACC. Given that OECR does not have the capacity to directly assist with these tasks, securing external expertise will ensure the timely and comprehensive development of governing documents that are essential for the effective operation of both oversight bodies. This investment will strengthen procedural clarity, enhance accountability, and ensure that the PAB and ACC function efficiently within their oversight mandates.

EXECUTIVE ACTION RECOMMENDATIONS

RECOMMENDATION 3

COMPREHENSIVE PUBLIC OUTREACH  
AND MARKETING STRATEGY

IMPLEMENTING ENTITIES

OECR

OECR should support PAB in developing a comprehensive public outreach strategy and marketing campaign to enhance visibility and engagement.

RECOMMENDATION 4

COMMUNITY ENGAGEMENT EVENTS

IMPLEMENTING ENTITIES

OECR

Support PAB in hosting at least eight public events annually to educate residents about police accountability and gather feedback.

RECOMMENDATION 5

LEGISLATIVE BRIEFINGS ON  
PAB ACTIVITIES

IMPLEMENTING ENTITIES

OECR

Support PAB in organizing at least one briefing per year for city and state lawmakers to discuss PAB activities, challenges, and policy recommendations.

RECOMMENDATION 6

INDEPENDENT DIGITAL PRESENCE  
FOR PAB AND ACC

IMPLEMENTING ENTITIES

OECR

Support PAB in creating a standalone website and digital presence to enhance accessibility, visibility, and independence from OECR.

# POLICY RECOMMENDATIONS

## LAW ENFORCEMENT RECOMMENDATIONS

### RECOMMENDATION 1

#### ADOPT POLICY GOVERNING INTERNAL INVESTIGATIONS

##### IMPLEMENTING ENTITIES

BPD

The Baltimore Police Department (BPD) should adopt a policy governing administrative misconduct investigations requiring that, among other things, its investigations are initiated within seven (7) days of receiving a complaint (to preserve critical evidence such as CCTV footage) and completed within timelines established by state or local law. This policy will be a counterpart to Policy 1008 (Investigative Operations) which governs how BPD conducts investigations into crimes against the public such as robbery, burglary, aggravated assault, auto theft, larceny, etc.

### RECOMMENDATION 2

#### RECORD TELEPHONE LINES USED FOR PUBLIC COMMUNICATIONS IN POLICE DISTRICTS

##### IMPLEMENTING ENTITIES

BPD

BPD should implement a policy requiring the recording of telephone lines in police districts that members of the public use to communicate with the Department. This change is necessary due to the Administrative Charging Committee’s (ACC) observation in reviewing cases where complainants allege officer misconduct during telephone interactions, but no voice recordings exist to assess the validity of the complaint or the officer’s denial. Recording these lines will enhance accountability, provide an objective record of interactions, and strengthen the integrity of misconduct investigations by ensuring that all communications between the public and officers are properly documented and reviewable.

RECOMMENDATION 3

AMEND POLICY ON PETITIONS  
FOR EMERGENCY EVALUATIONS AND  
VOLUNTARY ADMISSION (POLICY 713)

IMPLEMENTING ENTITIES

BPD

BPD should clarify “designated media professionals” in Policy 713 to ensure consistent and accurate responses to mental health crises. Providing a clear definition will improve consistency, and reduce confusion and liability risks in mental health-related incidents.

RECOMMENDATION 4

AMEND POLICY ON TOWING  
PROCEDURES (POLICY 902)

IMPLEMENTING ENTITIES

BPD

BPD should require officers to perform searches of recovered stolen vehicles prior to their return to owners, ensuring public safety and evidentiary preservation. Currently, officers have discretion to search even with the presence of probable cause. Allowing officer discretion increases the likelihood that vehicles are returned to owners containing illicit drugs and other items linked to criminal activity, leaving the vehicle owner to handle and discard the items themselves.

RECOMMENDATION 5

AMEND POLICY ON DEATH AND  
SERIOUS ASSAULT INVESTIGATIONS  
(POLICY 703)

IMPLEMENTING ENTITIES

BPD

BPD should amend Policy 703 to include a timeline by which a primary or designated officer must notify a deceased’s next-of-kin and require documentation of contact or attempted contacts. This will ensure timely communication with families during traumatic events.

RECOMMENDATION 6

AMEND POLICY ON RULES  
AND REGULATIONS (POLICY 302)

IMPLEMENTING ENTITIES

BPD

BPD should amend Policy 302 to specify how officers must furnish their name and badge number upon request, whether verbally, via contact card, or both. Clarifying this procedure will improve transparency and analysis of alleged officer misconduct (Case # PAB2024-0656).

RECOMMENDATION 7

ESTABLISH POLICY FOR  
MOTOR VEHICLE ADMINISTRATION  
MEDICAL REFERRALS

IMPLEMENTING ENTITIES

BPD

BPD should establish a policy outlining the procedure officers must follow to order drivers to the MVA for a medical referral or reexamination. This will help prevent abuse of discretion and retaliatory referrals (Case # PAB2024-0343).

RECOMMENDATION 8

INCREASED FOOT PATROLS TO  
BUILD COMMUNITY RAPPORT

IMPLEMENTING ENTITIES

BPD

BPD should increase foot patrols to strengthen community relationships and provide visible crime deterrence. Foot patrols foster trust and allow officers to better understand neighborhood dynamics.

## RECOMMENDATION 9

### OFFICER COMMUNICATION TRAINING

#### IMPLEMENTING ENTITIES

BPD

Require officers to undergo training in verbal and nonverbal communication, active listening, and body language to improve public interactions and de-escalation. Enhanced communication skills will reduce conflict and build trust.

## RECOMMENDATION 10

### PEER-TO-PEER EVALUATIONS FOR PIB INVESTIGATORS

#### IMPLEMENTING ENTITIES

BPD

Introduce peer evaluations for PIB investigators to improve accountability, professionalism, and performance. Peer feedback will encourage continuous improvement and collaboration.

## RECOMMENDATION 11

### INCORPORATING CRIMINAL PROCEDURE IN ACC TRAINING

#### IMPLEMENTING ENTITIES

MPTSC

The Maryland Police Training and Standards Commission (MPTSC) should include criminal procedure in its training program for ACC members. As criminal procedure is the primary body of law that applies when officers interact with members of the public, this training will improve case evaluation and officer conduct.

# CONCLUSION

In its second year, the Police Accountability Board (PAB) has made great progress in fulfilling its role in Baltimore City's public safety ecosystem, while laying the groundwork to continue tackling the significant work ahead. Through continued partnership with Baltimore City, law enforcement entities serving the City, and the public, the PAB is improving policing policy, providing a public voice on police misconduct discipline and other matters, and promoting communication and public awareness. The PAB hopes that this report will be helpful to members of the public and public safety stakeholders, because it will take all our efforts to ensure that public safety is transparent, accountable, and just.

# APPENDIX: DEFINITIONS

For the purposes of this report, the following definitions apply throughout unless otherwise noted:

## **Police Officer**

Pursuant to Md. Code, Public Safety, § 3-201(f), a police officer means an individual who is authorized to enforce the general criminal laws of the State; and is a member of a law enforcement agency including the Police Force of Baltimore City Community College, Baltimore City Sheriff's Office (BCSO), Baltimore Environmental Police (BEP), Baltimore Police Department (BPD), and Johns Hopkins Police Department (JHPD).

## **ANALYSIS TIMEFRAME**

### **Fiscal Year 2023 (FY23)**

This includes all cases received by the Office of Equity and Civil Rights, Police Accountability Division from July 1, 2022, through June 30, 2023.

### **Fiscal Year 2024 (FY24)**

This includes all cases received by the Office of Equity and Civil Rights, Police Accountability Division from July 1, 2023 through June 30, 2024.

### OVERSIGHT ENTITIES

#### **Administrative Charging Committee (ACC)**

The Administrative Charging Committee (ACC) reviews the investigative findings of each police misconduct case forwarded by the law enforcement agency (LEA). The Committee is the only police oversight entity that has the authority to determine whether a police officer should be administratively charged and to recommend discipline based on the State of Maryland's Disciplinary Matrix and the police officer's prior disciplinary history record. All cases received are heard by the ACC.

#### **Civilian Review Board (CRB)**

The Civilian Review Board (CRB) is an independent agency in Baltimore City through which its public members may issue a complaint against officers of six law enforcement agencies: the Police Force of Baltimore City Community College, Baltimore City Sheriff's Office, Baltimore Police Department, and Morgan State University Police. This Board is only authorized to investigate five specific complaint types: abusive language, excessive force, false arrest, false imprisonment, and harassment. The Civilian Review Board is the only police accountability board with subpoena powers.

#### **Police Accountability Board (PAB)**

The Police Accountability Board (PAB) appoints members to and oversees the Administrative Charging Committee and the Civilian Review Board, issues public reports on the state of police misconduct in Baltimore City, and provides policy and procedure recommendations to the Mayor of Baltimore City and the Maryland General Assembly.

### CASE STATUS

#### **Administratively Closed**

The case could be a duplication of a case, sent in error, or is out of the Administrative Charging Committee's jurisdiction. Duplication can occur when a complainant files with the law enforcement agency and the Office of Equity and Civil Rights, Police Accountability Division on behalf of the Police Accountability Board. The determination is shared with the law enforcement agency, the responding officer(s), and the civilian(s), if the civilian's information was provided.

#### **Closed: Administratively Charged**

The Administrative Charging Committee (ACC) officially recommended discipline for at least one officer with a minimum of one allegation on the case. The ACC's determinations are shared with the law enforcement agency, the responding officer(s), and the civilian(s), if the civilian's information was provided.

#### **Closed: Not Administratively Charged**

The Administrative Charging Committee (ACC) officially did not recommend discipline for all responding officers. The ACC's determinations are shared with the law enforcement agency, the responding officer(s), and the civilian(s), if the civilians' information was provided.

#### **Open**

An initial police misconduct complaint has been received by the law enforcement agency or by the Office of Equity and Civil Rights (OECR) Police Accountability Division (PAD) on behalf of the Police Accountability Board (PAB). OECR is waiting on the investigation to be completed by the law enforcement agency and a completed, or near completion, investigative case file to be sent back to OECR for a hearing date with the Administrative Charging Committee.

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**Scheduled for Administrative Charging Committee (ACC) Review**

The police misconduct complaint case has been assigned a hearing date to be heard by the Administrative Charging Committee (ACC).

**CASE INTAKE**

**Forwarded by Agency - External**

These are police misconduct cases that have been filed by someone outside of the law enforcement agency (LEA) and have been forwarded to the Police Accountability Division (PAD) of the Office of Equity and Civil Right (OECR) on behalf of the Police Accountability Board (PAB).

**Forwarded by Agency - Internal**

These are police misconduct cases that have been filed by a sworn member of the law enforcement agency (LEA) and have been forwarded to the Police Accountability Division (PAD) of the Office of Equity and Civil Rights (OECR) on behalf of the Police Accountability Board.

**Police Accountability Board (PAB) Intake**

These are police misconduct cases that have been received by the Police Accountability Division (PAD) of the Office of Equity and Civil Rights (OECR) on behalf of the Police Accountability Board (PAB). These could be collected in-person, by mail, phone, or through the OECR website.

**Unknown**

The case intake is unknown to the Police Accountability Division (PAD) of the Office of Equity and Civil Rights (OECR) as it was not provided by the law enforcement agency (LEA).

### COMPLAINT ALLEGATIONS

The following definitions are from the Baltimore Police Department (BPD), Public Integrity Bureau's (PIB) *Internal Operations and Training Manual* (effective September 2020).

NOTE: There are allegation definitions that are missing. The definitions missing were not available through the Baltimore Police Department, Public Integrity Bureau's *Internal Operations and Training Manual*.

#### **Abuse of Discretion/Authority**

Acts that are done for personal gain or benefit (or for the benefit of others, e.g., family or friends of the officer) that constitute an abuse or overstep of the discretion and authority afforded to a law enforcement officer.

#### **Abuse or Discriminatory Language**

A member's language or use of remarks intended to be demeaning, humiliating, mocking, insulting, or belittling that may or may not be based on the actual or perceived race, color, religion, sex, national origin, sexual orientation, or gender identity of an individual.

#### **Computer/Email/Internet Misuse**

Using BPD devices, BPD software, BPD accounts, or BPD resources in a way that would constitute a violation of BPD's Email, BPDnet, Internet Usage and Social Media policies.

#### **Conduct Unbecoming of a Police Officer/Employee**

Any breach of the peace, neglect of the peace, misconduct, or any conduct or omission on the part of any member of the

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	<p>Department, either within or outside of the City of Baltimore, and whether on- or off-duty, which tends to undermine the good order, efficiency or discipline of the Department, or which reflects discredit upon the Department or the member thereof, or which is prejudicial to the efficiency and discipline of the Department, even if such misconduct is not specifically enumerated elsewhere in policy.</p>
<b>Criminal Misconduct - Domestic Violence</b>	<p>Officer engages in assault of their spouse or significant other.</p>
<b>Criminal Misconduct - Driving Under the Influence (DUI)</b>	<p>Officer engages with any offense alleging impaired driving in any state or federal jurisdictions.</p>
<b>Criminal Misconduct - Felony</b>	<p>An employee has been alleged to have committed a criminal felony offense or has been sustained administratively for committing a criminal felony offense or has been criminally charged with committing a criminal felony offense. Also includes a conviction for a criminal felony offense.</p>
<b>Criminal Misconduct - Misdemeanor</b>	<p>An employee has been alleged to have committed a criminal misdemeanor offense or has been sustained administratively for committing a criminal misdemeanor offense or has been criminally charged with committing a criminal misdemeanor offense. Also includes a conviction for a criminal misdemeanor offense.</p>
<b>Criminal Misconduct - Planting Evidence</b>	<p>Officer engages in falsifying evidence.</p>
<b>Criminal Misconduct - Sexual Misconduct</b>	<p>Officer engages in any sex-related crime under state or federal law in any court.</p>

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<b>Criminal Misconduct - Theft Related</b>	Officer engages in any theft-related crime.
<b>Discourtesy</b>	Failing to be courteous and considerate in interactions with the public.
<b>Discriminatory Policing</b>	Violation of the following policies: Policy 317 (Fair and Impartial Policing) and Policy 720 (Interactions with LGBTQ Individuals).
<b>Domestic Incident</b>	Verbal argument or dispute between intimate partners or former intimate partners.
<b>Failure to Appear in Court (FTA)</b>	Failing to appear in court and/or provide testimony when subpoenaed for any of the following proceedings: Federal and/or State Grand Juries, Criminal Courts, Civil Courts, State Liquor Board, Motor Vehicle Administration, Forfeiture Court, Environmental Control Board, the Civilian Review Board (for witness officers), and/or an Administrative Hearing Board.
<b>Failure to Intervene</b>	Failure to intervene as required by Policy 319 (Duty to Intervene).
<b>Failure to Operate BWC as Required</b>	Failure to comply with the BWC policy, such as (1) failing to activate the BWC; (2) failing to keep the BWC activated; (3) failing to report a malfunctioning BWC; or (4) failing to store the BWC properly or keep it in good repair.
<b>Failure to Report Use of Force</b>	Failure to write, report, or record a use of force when required to do so per Departmental policy.
<b>Failure to Supervise</b>	Failure to supervise a subordinate employee as required. This includes failing to counsel, failing to report misconduct of a subordinate, failing to train, or stop a

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	subordinate from committing an offense that is a violation of Departmental policy, City Ordinance, State law, or Federal law.
<b>False Arrest</b>	An arrest made without legal justification.
<b>False Imprisonment</b>	The intentional restriction without legal justification of the freedom of movement of a person who is aware of the restriction and who does not consent.
<b>False Statement/Untruthfulness</b>	Making, whether orally or in writing, any false statement or misrepresentation of any material fact, or making any material omission of fact, including but not limited to statements or omissions made with the intent to mislead any person or tribunal.
<b>Foot Pursuit Violation</b>	Failure to comply with Policy 1505 (Foot Pursuits).
<b>Harassment</b>	(1) Repeated or unwarranted conduct that is intended to be overtly demeaning, humiliating, mocking, insulting, or belittling, or (2) any conduct that is intended to cause unnecessary physical discomfort or injury. Harassment does not include conduct that is reasonably necessary to affect a lawful purpose.
<b>Improper Search</b>	One or more searches conducted in violation of BPD's search policies: Policy 1109 (Warrantless Searches), and Policy 1007 (Search and Seizure Warrants).
<b>Improper Seizure of Personal Property</b>	Taking of a person's personal property without legal justification or in violation of BPD policies governing seizure: Policy 1016 (Public Observation/Recording of Officers),

Policy 1007 (Search and Seizure Warrants), and Policy 1401 (Control of Property and Evidence). Such conduct could overlap with other property- or integrity-related allegations, such as criminal misconduct.

### **Improper Stop**

When an individual is stopped/detained without reasonable articulable suspicion or probable cause or other legal justification (e.g., to prevent suicide) that the individual is planning to commit, did commit or is about to commit a crime.

### **Inappropriate Association**

Knowingly commencing or maintaining a relationship with any person who is under criminal investigation, indictment, arrest, or incarceration by this or another law enforcement or criminal justice agency or persons whom they know, should know, or have reason to believe are involved in criminal activity (except as necessary for the performance of official duties) or where unavailable or impractical because of familial relationships. Pursuing or engaging in social, sexual or romantic relationships with non-members known or believed to be recently active as confidential informants, victims, or witnesses. Knowingly entering any establishment in which the law is knowingly violated (except in the performance of official duties).

### **Inappropriate Comments and/or Gesture(s)**

Any inappropriate statements, including language that is unprofessional but not demeaning on its face. This language can be exchanged between two or more BPD employees, in addition to situations where it is directed at one or more civilians. Additionally, if the comments or gestures arise to the level of abusive language, that

	<p>allegation would be added, and the complaint may be subject to concurrent Civilian Review Board (CRB) jurisdiction.</p>
<b>Inappropriate Workplace Conduct</b>	<p>Unwelcome conduct from a supervisor, coworker, and/or group of coworkers that belittles, threatens, demeans, disparages, ridicules or shows hostility towards an individual or group of workers. Physical assaults, threats, bullying and intimidation are forms of inappropriate workplace conduct. Inappropriate workplace conduct may also include offensive jokes, name-calling, offensive names, inappropriate images on a computer, and offensive pictures or objects. Such conduct need not be motivated by bias against a protected category (e.g. race, sex, or age).</p>
<b>In-Custody Death</b>	<p>A death of an in-custody individual that is attributable to the actions or inactions of a BPD member. For purposes of classification, "in-custody" extends beyond the physical control of BPD persons, vehicles, or buildings to include the presence of BPD members. The circumstances of the death may give rise to additional allegations, including criminal misconduct.</p>
<b>Insubordination</b>	<p>Refusing to comply with a lawful order.</p>
<b>Interference with Civilians' Protected Free Expressions/Speech</b>	<p>Failure to comply with the provisions of Policy 804 (First Amendment Protected Activity), and Policy 1016 (Public Observation/Recording of Officers).</p>
<b>Neglect of Duty</b>	<p>Failure to properly perform their assigned duties or reasonably exercise their discretion.</p>

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### **Negligent Use/Handling/Storage of Firearms**

The negligent use, handling, and storage of a firearm(s) that is contrary to the firearms policy.

### **Respondent in Civil Protective Order**

BPD member is named as a respondent in a protective order application and/or a granted protective order.

### **Retaliation**

Taking adverse action against an individual because they have engaged in activity protected by law or policy. (In this context, "adverse action" means conduct – even if otherwise lawful – that would dissuade a reasonable individual from engaging in that protected activity.) This allegation can apply to complaints received through internal sources as well as external sources.

### **Secondary Employment Violation**

Any violation of the Secondary Employment policy.

### **Securing/Treatment of People Being Detailed or Transported**

Unjustified failure to properly secure, search, or guard a person in the officer's custody—whether or not the member's acts or omissions are intentional. Failing to operate a Department motor vehicle with utmost care and caution in violation of Policy 1503 (Emergency Vehicle Operation and Pursuit Policy) or other policies related to the operation or use of a BPD vehicle.

### **Vehicle Pursuit Violation**

Operating a law enforcement vehicle in attempts to keep pace and/or to immediately apprehend one or more occupants of an eluding vehicle under circumstances that are not allowed for in Policy 1503 (Emergency Vehicle Operation and Pursuit Policy).