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**Written Testimony of  
Matthew Barge  
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**“Policing Strategies for the 21<sup>st</sup> Century”  
Committee on the Judiciary  
United States House of Representatives**

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WRITTEN STATEMENT OF  
Matthew Barge  
Vice President & Deputy Director, Police Assessment Resource Center (PARC)

BEFORE THE  
COMMITTEE ON THE JUDICIARY  
UNITED STATES HOUSE OF REPRESENTATIVES

“Policing Strategies for the 21st Century”  
May 19, 2015

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Chairman Goodlatte, Ranking Member Conyers, and distinguished members of the Committee:

My name is Matthew Barge. I am the Vice President and Deputy Director of the Police Assessment Resource Center (PARC). I appreciate the opportunity to appear before you and provide an independent perspective on the substantial challenges and opportunities that our local police departments face.

In light of recent high-profile incidents involving local law enforcement agencies and related unrest in several communities across the country, attention has appropriately turned to figuring out what police strategies and approaches best promote effective, safe, and constitutional policing. However, these efforts to identify best practices go back decades.

Some have wondered whether police agencies in our local communities are capable of changing or of proactively reforming themselves. My organization, PARC, has a long history of providing independent, evidence-based counsel on effective, respectful, and publicly accountable policing. A nonprofit organization with offices in New York and Los Angeles, it was founded in 2001 by the Vera Institute of Justice, and with the generous support of the Ford Foundation. PARC is not an advocacy organization. Instead, it is committed to serving as an honest broker that helps law enforcement agencies solve problems by incorporating best practices, managing risks, using data-driven management, and providing services with greater efficiency and accountability. We do all of this with an eye toward increasing officer safety, public safety, and public confidence in the police. PARC has assisted upward of 30 agencies, local governments, or community organizations in these efforts in its 14 years in existence.

In our experience, police departments can change – and they are changing. Local governments and police agencies themselves regularly call on PARC to conduct comprehensive assessments of where their departments are, where they should be, and what they need to do in order to align with best practices with respect to accountability and effectiveness. In Portland, Oregon, for

example, PARC conducted a review of officer-involved shootings and made recommendations for changes in policy, training, and practice. The implementation of those recommendations led to an 88% drop in officer-involved shootings, a 59% decrease in use of force, and a 51% decrease in citizen's complaints – all without increases in officer injuries or crime.<sup>1</sup> Likewise, for some 21 years, Los Angeles County engaged PARC's Executive Director to serve as special counsel for monitoring the Los Angeles County Sheriff's Department, the fourth-largest law enforcement agency in the U.S. The effort produced results with respect to officer training, citizen's complaints, medical care in jails, recruitment and hiring, anti-gang strategies, and many other areas.<sup>2</sup>

In some instances, however, more sustained attention at the national level is necessary. One consequence of our democracy is that police authority is highly fragmented. The most recent data indicate that we have more than 12,000 local police departments that employ roughly 477,000 full-time police officers. Nearly half of these departments employ no more than 10 officers.<sup>3</sup> Some departments fail to identify problems in their relationship with the community, deficiencies in officer oversight, or problems in how its officers use force or detain subjects. Many departments either do not “have access to enough useful information about [law]suits” involving their officers or “intentionally ignore information from suits” relating to problematic incidents.<sup>4</sup> Patterns or practices of unlawful policing can take hold.

When problems fester in local police departments, the U.S. Department of Justice (“DOJ”) may exercise the authority granted by this body<sup>5</sup> to conduct an investigation into alleged patterns of misconduct within a police department with respect to excessive force, discriminatory policing, unlawful stops and searches, and other constitutional violations. Where the allegations are substantiated, those investigations can lead to agreements between the Department of Justice and the involved local jurisdiction, with input from community stakeholders, to implement a package of reforms and remedial measures.

Some of the DOJ settlements take the form of federal-court-overseen consent decrees. The consent decree process is akin to emergency open-heart surgery for police departments. It addresses serious, systemic issues that have built up over time. It is a major intervention that, historically, the Department of Justice has used selectively, at critical moments, and where rigorous and sustained intervention is needed. It is intended to last no longer, but end no sooner, than it takes for the identified problems to be effectively remedied while ensuring officer and public safety. In the past three years, DOJ successfully concluded implementation of two major consent decrees addressing the Los Angeles Police Department and District of Columbia Metropolitan Police Department.

Currently, the Department of Justice is enforcing ten federal-court-overseen consent decrees. PARC's Executive Director, Merrick Bobb, serves as the federal court-appointed, independent

monitor of one of those decrees, which relates to the Seattle Police Department (“SPD”). I serve as his deputy, overseeing a nationwide network of law enforcement experts. Mr. Bobb has nearly 25 years of experience with law enforcement issues, starting with the blue-ribbon commission chaired by Warren Christopher to reform the Los Angeles Police Department (LAPD) in the wake of the Rodney King incident in the early 1990s.

Whether reform is self-initiated, occurs to conform with national standards like those of the Commission on Accreditation for Law Enforcement Agencies (“CALEA”), or occurs pursuant to a federal investigation or DOJ settlement, the bedrock of policing in the 21st century must be a strong, responsive relationship between the nation’s police departments and the communities that they serve.

To that end, a common playbook of specific, real-world practices and reforms is emerging for ensuring the safety of the public and officers, advance efficient law enforcement, protect constitutional rights, and enhance public trust in the police across America’s diverse communities. The challenges are substantial, and the work is hard – but law enforcement agencies can today make reforms that we know work in order to enhance accountability and trust. The remainder of my testimony will summarize these areas.

## **I. USE OF FORCE**

### ***A. Policy & Training***

Officers need clearer, more specific, and more pragmatic guidelines on when they may use force in the field and what level of force is permissive in a given case. This is especially true when Court decisions directly situate the constitutionality of force in terms of “the facts and circumstances confronting” an officer in a given situation<sup>6</sup> – and expressly disclaim the existence “a magical on/off switch that triggers rigid preconditions” that make some force appropriate and some inappropriate.<sup>7</sup> Although general standards and balancing tests may be fair and workable for courts, officers in the real world and the communities that they serve need and deserve clear expectations and pragmatic rules for when force is justified.

Any use of force policy must balance concision with precision and broad applicability. It must guide officers across innumerable unforeseen circumstances yet be specific enough to permit a department to hold officers accountable for using inferior tactics or poor decision-making.

For example, the DOJ-, Monitor-, and Court-approved officer use of force policy in Seattle requires that all officer force be necessary, reasonable, proportional to the danger or threat posed by the subject, and used when no reasonable alternatives to de-escalate were available. However, absent limited exceptional circumstances, it prohibits officers from using force on

restrained or handcuffed subjects. That provision directly responds to the Department of Justice’s finding in its 2011 investigation that SPD had previously “engage[d] in a pattern or practice of using excessive force against individuals who are already under control” and who, consequently, under most circumstances “does not pose an immediate threat to the safety of the officer or the public.”<sup>8</sup>

Thus, SPD policy provides greater clarity on how to use force in particular circumstances based on the history of that particular Department and concerns of the community that it serves. PARC has similarly assisted a number of other agencies in crafting specific use of force policies tailored to the concerns and histories of their own communities.

Every police department in the United States has the same opportunity to set forth clear and specific policies on when force may be used that reflect the values of the community and organization and go further than the bare, often vague requirements of the courts in the area – and to doggedly insist on strict adherence to the policies as preconditions for continued employment with the department.

As the recent national dialogue has proceeded, a consensus has started to emerge that departments should emphasize the importance of de-escalation – or slowing down and defusing situations in a manner that might lessen or eliminate the possibility that an officer will need to contemplate force at all.<sup>9</sup> These tactics include strategic use of distance, cover, and concealment; verbal techniques aimed toward persuasion or the promotion of rational decision-making; and calling for more or more specialized officers to the scene. The goal is to maximize opportunities for incidents and interactions to conclude without officers needing to use force.

Seattle, under the Department of Justice consent decree, is also leading the way in de-escalation. There, officers are *required* by policy to use de-escalation tactics whenever safe under the circumstances and time and circumstances permit.<sup>10</sup> No longer are these tactics taught as an “extra” skill or course disconnected from the “real” tactical concerns of firearms or Taser training. Instead, they are being woven throughout more than 32 hours of training this year alone, with de-escalation presented as often the best strategic option and valuable both to officers and the communities that they serve.

Because it increases officer safety and mitigates the need to use force, de-escalation training is being adopted by law enforcement agencies nationwide. Training on defusing critical incidents has been recently embraced by the New York Police Department<sup>11</sup>, Pennsylvania<sup>12</sup>, and several other agencies. Departments in Oakland and Dallas are providing stress inoculation training geared toward providing officers with superior decision-making skills in high-stress incidents.

## ***B. Officer Training on Mental Health & Behavioral Issues***

At least half of officer-involved shootings involve a subject experiencing mental health issues – and the numbers are higher than that in some communities.<sup>13</sup> Meanwhile, officers increasingly feel as though the burdens of failures elsewhere in our social service networks fall ever more to them.

Departments from Las Vegas to Dallas, and Chicago to the United States Capitol Police Department, are responding by providing specialized training on identifying and interacting with subjects with behavioral and mental health issues.<sup>14</sup> These “crisis intervention programs” have produced real results. For instance, after providing expanded crisis training to officers and establishing a dedicated team to address individuals experiencing a behavioral crisis, the Oakland Police Department reduced its overall use of force by some 50 percent. Use of force and officer injuries both declined sharply in the years following implementation of a crisis intervention program in Memphis. In Seattle, the Consent Decree has resulted in a regional committee of health experts, clinicians, community advocates, academics, members of the judiciary, and the police to situate the Police Department’s efforts to respond to individuals experiencing behavioral crisis.

A number of national organizations, including the International Association of Chiefs of Police (“IACP”) and the National Alliance on Mental Illness (NAMI),<sup>15</sup> have endorsed the implementation of crisis intervention programs. Crisis intervention is an important part of most DOJ settlements in the policing area, and the number of good “off-the-shelf” training programs makes this a reform that is effective, is affordable, and increases officer and public safety.

## **II. ADMINISTRATIVE INEFFICIENCY & INTERNAL ACCOUNTABILITY**

Many police agencies resemble what might happen if the stereotypical Department of Motor Vehicles ran the U.S. military: an inefficient, inept bureaucracy overseeing a necessarily rigid command-and-control structure empowered to use force. This produces a law enforcement culture often resistant to new approaches and systems. Officers tend to be rewarded and promoted for “staying in their lanes,” not making difficult decisions or challenging the *status quo*. Pushing paper substitutes for real accountability and meaningful oversight of what officers are actually doing on the streets. In some jurisdictions, well-intentioned police chiefs have difficulty replacing problem employees because of civil service protections or state employment laws.

Accordingly, a major focus of any reform effort, whether initiated by the local community or the federal government, must be on basic organizational reform – making ossified bureaucracies and ineffective administrative processes more nimble, responsive, innovative, and transparent. In a

number of important areas, police departments simply need to become more comfortable with change and new ways of doing business. The day-to-day operational culture of many agencies must change.

For example, just as doctors present cases to peers and even winning teams review game footage, law enforcement agencies must commit to processes and procedures for comprehensively analyzing the performance of officers and holding them accountable. Some of the best departments have a dedicated Force Review Board that reviews, analyzes, and evaluates all uses of force so that the department can perpetually update its training, tactics, procedure, and policy in light of lessons learned about how officers are operating in the real world. It is a standard part of the Department of Justice's settlements in the police area and constitutes a best practice. The challenge is to make members of these, and other similar, mechanisms for critical self-analysis comfortable with the notion of evaluating the conduct of another officer. As uncomfortable as this exercise may be at first, it is necessary to enable departments to learn from the past and better prepare their officers to face problems in the field more safely and appropriately.

Citizens have a role in eliminating administrative inefficiency and promoting accountability, as well. Permanent civilian oversight mechanisms – whether taking the form of a civilian board that investigates or reviews complaints about the police, an institutional inspector general or monitor to conduct larger-scale assessments of departmental trends, or an auditor who reviews completed internal investigations<sup>16</sup> – can give communities a real-time “check” on police authority and a say in how policing is conducted.

Several jurisdictions, including Eugene, Oregon and Milwaukee, Wisconsin, have affirmatively sought PARC's counsel in helping it decide what form or structure of civilian oversight might best address their concerns. Likewise, the DOJ consent decree process often inspires this greater and more formal involvement in the nuts and bolts of police oversight and accountability. Just a few weeks ago, Newark, New Jersey created “one of the country's strongest civilian police-review boards” that will have subpoena power and make binding recommendations as it enters into a consent decree.<sup>17</sup> The Seattle decree created a Community Police Commission to provide input and policy recommendations during the reform process.

Too often, “community policing” means talking at communities or organizing isolated, small-scale initiatives. For trust to be restored between the community and police where it has frayed, the community needs to be an ongoing part of policing in significant, structural ways.

### **III. DATA-DRIVEN POLICING**

As memorialized in the book and movie *Moneyball*, the 2002 Oakland Athletics and then-general manager Billy Beane famously used sophisticated data analytics and an evidence-based

management approach to improve performance on the baseball field. Many departments are, however, a long way from playing Moneyball.

Currently, too many police agencies have no idea how often their officers use force, are involved in shootings, or make stops. If data exists, it is often inaccurate, inaccessible, or ignored. In one police department where PARC has recently worked, a supervisor wanting to know whether or when an officer had been trained to use the Taser – an important, less-lethal force instrument – would have to manually sift through stacks of unorganized 3 x 5 index cards. One of the reasons that “there is no reliable national data on how many people are shot by police officers each year”<sup>18</sup> is because many police departments themselves are unconcerned with tracking what their officers are doing in the field.

No one – not lawmakers, the Department of Justice, or organizations like ours – can know what to change without knowing how departments really are policing. Policing in the 21st century needs to take advantage of the information systems that we take for granted in so many other areas of public and private life.

Lacking solid information, officers in too many departments are managed and supervised based on gut instinct or intuition rather than objective evidence about an officer’s performance. Personal affinities or the amorphous sense that an officer is a “good guy” or “good gal” leads supervisors to cut corners and cut breaks when it comes to accountability.

In the same way that many jurisdictions have adopted technological systems modeled after COMPSTAT, the pioneering and influential data system originating in New York City in the early 1990s, to guide officer deployment and crime prevention efforts<sup>19</sup>, more need to adopt and proactively use data on how its officers are using force, making stops, and engaging with subjects in the field.

In most Department of Justice consent decrees and collaborative reform initiatives, a so-called Early Intervention System is a primary reform. The goal of these usually non-disciplinary systems is for departments to use objective data and information about what its officers are doing in the field in order to identify and respond proactively to performance trends that may suggest that an officer is at risk – so that bad habits or “bad apples” can be addressed early and affirmatively.

The concept of an Early Intervention System is not new, and organizations like IACP and CALEA have advocated their use. Nonetheless, too many departments still lack the systems or, when they have them, fail to use them effectively. Supervisors often lack training on how to identify potential problems and how to interact with officers requiring intervention. In addition, too many departments focus the early intervention systems that they do have exclusively at line



officers – failing to examine whether supervisors and managers are living up to their own responsibilities.

#### **IV. DISCRIMINATORY POLICING CONCERNS**

Within the communities where PARC works, we consistently hear from individuals that the weights and burdens of law enforcement are not equally shared. When they hear about the apparent choking death of a black man for peddling a few loose cigarettes, or the shooting of a black twelve-year-old two seconds after a police officer exited his patrol car, they wonder whether the outcomes might have been different if the subjects involved had looked different. Especially with respect to patterns of stops and detentions, empirical evidence supports the proposition that the practices of police in some areas are disproportionately affecting some of our communities more than others.<sup>20</sup>

The challenge for our police departments and our communities is to go beyond talking about the problem and looking for real-world solutions to addressing an issue that is clearly affecting the police-community relationship.

Abundant social science research has established that even individuals expressly committed to treating people equally may be affected by implicit biases or subconscious associations between Black, Latino, and some other historically minority populations and crime.<sup>21</sup> Individuals across professions and political ideologies have all been found prone to harbor subconscious associations between groups of individuals and crime.<sup>22</sup> Indeed, research indicates that non-white individuals also tend to exhibit implicit bias with respect to other non-white individuals.<sup>23</sup>

These implicit biases can particularly and unconsciously affect decisions in fast-moving situations – the type of circumstances that police officers regularly encounter. Police officers may have subconscious biases in the same way that many people across various stations in life do, but the difficult job of police officers – to make quick decisions based on limited information about previously unknown individuals – heightens the risk that unconscious associations may have effects in the real world that drive distance between the police and our communities. This February, FBI Director James Comey called upon law enforcement to recognize this important fact.<sup>24</sup>

Forward-thinking departments are providing officers with clear strategies and tactics for attempting to minimize the effects of implicit bias – by slowing situations down where feasible to ensure more time and space for identifying person-specific facts and by using intentional decision-making processes, again increasing officer and public safety.

Departments are also partnering with community organizations to provide training on procedural justice and fairness issues. Literature and life experience tells us that the *outcome* of an interaction matters less than an individual's sense of *how* he or she was treated.<sup>25</sup> Among individuals who get pulled over by a police officer, an individual's view of the incident correlates not with whether the officer gave them a ticket or not but, rather, with how fairly and equitably they believe that the officer treated them.

Just as ticket representatives for Southwest Airlines or customer service representatives at Federal Express receive training on problem-solving-oriented communication and are empowered to establish authentic, one-to-one relationships with the public,<sup>26</sup> patrol officers must feel empowered to find ways of making individuals across communities believe that the police are treating them not as a race, face, or place but as an individual.

## V. CONCLUSION

In my ten years doing work with law enforcement agencies, I have encountered countless men and women who represent public service at its most competent, selfless, and laudable. However, even in healthy accountable police agencies where the interests and perspectives of the community are fully represented, officers may perform poorly. Some will make mistakes or bad decisions. To all of us – and to the rank-and-file officers who execute their duties ably, fairly, and constitutionally – accounts of officers engaging in misconduct are troubling. It can be tempting to conclude that nothing has changed in American policing and that nothing ever will.

Real reform is hard work. It rarely proceeds in straight lines. The true test, however, of whether we use this unique moment in American history is whether police agencies put in place the systems, policies, structures, and culture to manage for themselves the risk of unconstitutional policing. Departments must hold officers rigorously accountable through fair and transparent processes, critically analyze officer and departmental performance based on objective data, and proactively identify and seriously address performance issues and trends.

No police department is consigned to be only what it has been in the past. Organizational cultures change. New leadership can energize. Frayed relationships can mend. Old and rigid approaches can give way to dynamic innovation.

Modern American policing faces an era of unparalleled challenges. Too many communities view the police as “them” rather than “us.” The challenge that law enforcement agencies must embrace is to implement the kinds of tested, promising, and common-sense steps that might enhance public trust and legitimacy.

- <sup>1</sup> See Portland Police Bureau, Police Assessment Resource Center (last visited May 15, 2015), <http://www.parc.info/portland/>.
- <sup>2</sup> See Thirty-Fourth Semiannual Report of Special Counsel, Los Angeles County Sheriff's Department (Aug. 2014), available at <http://static1.squarespace.com/static/5498b74ce4b01fe317ef2575/t/54fc75b3e4b03edc59f8fd9b/1425831347689/34th+Semiannual+Report.pdf>.
- <sup>3</sup> Bureau of Justice Statistics (BJS), *Local Police Departments, 2013: Personnel, Policies, and Practices* (May 2015), available at <http://www.bjs.gov/content/pub/pdf/lpd13ppp.pdf>.
- <sup>4</sup> Joanna C. Schwartz, "Myths and Mechanics of Deterrence: The Role of Lawsuits in Law Enforcement Decisionmaking," 57 U.C.L.A. L. Rev. 1023, 1027, 1023 (2010).
- <sup>5</sup> 42 U.S.C. § 14141.
- <sup>6</sup> *Graham v. Connor*, 490 U.S. 387 (1989).
- <sup>7</sup> *Scott v. Harris*, 127 S.Ct. 1769, 1777 (2007).
- <sup>8</sup> U.S. Dept. of Justice, Civil Rights Division and U.S. Atty's Office, W.D. Wash. Investigation of Seattle Police Department at 14 (Dec. 16, 2011).
- <sup>9</sup> See, e.g., President's Task Force on 21st Century Policing, *Interim Report of the President's Task Force on 21st Century Policing* 21 (Mar. 2015) (recommending emphasis on de-escalation in policy and training); "Utah Lawmakers Hold Study Session on Police Use of Force"; Matt Apuzzo, "Police Rethink Long Tradition on Using Force," *N.Y. Times* (May 4, 2015) (discussing recent re-examination of police training in multiple departments).
- <sup>10</sup> *United States v. City of Seattle*, 2:12-cv-01282-JLR, Dkt. No. 204-1 at 2, 8.
- <sup>11</sup> Marc Santora, "Mayor de Blasio Announces Retraining of New York Police," *N.Y. Times* (Dec. 4, 2014).
- <sup>12</sup> Tony Larussa, "W.Pa. police chiefs discuss use of force, de-escalation tactics," *Pittsburgh Tribune* (Jan. 8, 2015).
- <sup>13</sup> Nat'l Sheriffs' Ass'n & Treatment Advocacy Ctr., "Justifiable Homicide by Law Enforcement Officers: What is the Role of Mental Illness" at 6 (Sept. 2013).
- <sup>14</sup> See, e.g., Megan Pauly, "How Police Officers Are (or Aren't) Trained in Mental Health," *Atlantic* (Oct. 11, 2013).
- <sup>15</sup> International Association of Chiefs of Police, "Improving Officer Response to Persons with Mental Illness and Other Disabilities: A Guide for Law Enforcement Leaders," available at [http://www.theiacp.org/Portals/0/pdfs/IACP\\_Responding\\_to\\_MI.pdf](http://www.theiacp.org/Portals/0/pdfs/IACP_Responding_to_MI.pdf); National Alliance on Mental Illness, "CIT" (last visited May 15, 2015), available at <http://www2.nami.org/Template.cfm?Section=CIT&Template=/ContentManagement/ContentDisplay.cfm&ContentID=150503>.
- <sup>16</sup> Merrick Bobb, et al, Police Assessment Resource Center, "Review of National Police Oversight Models" (2005).
- <sup>17</sup> Heather Haddon, "Newark Unveils Civilian Police-Review Board," *Wall Street Journal* (Apr. 30, 2015).
- <sup>18</sup> Wesley Lowery, "How many police shootings a year? No one knows," *Washington Post* (Sept. 8, 2014).
- <sup>19</sup> See, e.g., Weisburd, et al., "Reforming to Preserve: Compstat and Strategic Problem Solving in American Policing," 2 *Criminology & Pub. Pol'y* 421, 422-23 (2003); Willis, et al., "Making Sense of COMPSTAT: A Theory-Based Analysis of Organizational Change in Three Police Departments," 41 *Law & Society Review* 147, 148-49 (2007).
- <sup>20</sup> *Floyd v. City of New York*, 1:08-cv-01034 at 21 (Aug. 12, 2013).
- <sup>21</sup> See Kirwan Institute for the Study of Race and Ethnicity, "State of the Science: Implicit Bias Review 2014 at 16, available at <http://kirwaninstitute.osu.edu/wp-content/uploads/2014/03/2014-implicit-bias.pdf>; see generally Thomas Gilovich, et al, *Heuristics and Biases: The Psychology of Intuitive Judgment* (2002); Daniel Kahneman, *Thinking, Fast and Slow* (2013).
- <sup>22</sup> See, e.g., Theodore Eisenberg & Sheri Lynn Johnson, "Implicit Racial Attitudes of Death Penalty Lawyers," 53 *DePaul L. Rev.* 1539 (2004); Alexander R. Green, et al, "Implicit Bias among Physicians and its Prediction of Thrombolysis Decisions for Black and White Patients," 22 *Journal of Gen. Internal Medicine* 1231 (2007); Tom Rudd, et al, Kirwan Inst., "Racial Disproportionality in School Discipline" (Feb. 2014), available at <http://kirwaninstitute.osu.edu/wp-content/uploads/2014/02/racial-disproportionality-schools-02.pdf>.
- <sup>23</sup> See, e.g., Theodore R. Johnson, "Black-on-Black Racism: The Hazards of Implicit Bias," *Atlantic* (Dec. 26, 2014) (noting that performance on implicit bias assessments reveal that black respondents "subconsciously hold a slight preference for whites over blacks" and harbor some subconscious biases with respect to blacks); Marcus Woo, "How Science is Helping America Tackle Police Racism," *Wired* (Jan. 21, 2015) ("Some studies found that even black people can have anti-black bias . . . suggesting that the root of the bias isn't in any particular race, but in the prejudice and stereotype that's embedded throughout culture and society.").

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<sup>24</sup> Remarks of James B. Comey at Georgetown Univ. (Feb. 12, 2015), *available at* <http://www.fbi.gov/news/speeches/hard-truths-law-enforcement-and-race>.

<sup>25</sup> Rod K. Brunson & Jacinta M. Gau, “Procedural justice and order maintenance policing: A study of inner-city young men’s perceptions of police legitimacy,” 27 *Justice Quarterly* 255 (2010).

<sup>26</sup> David E. Bowen & Edward E. Lawler III, “Empowering Service Employees,” *MIT Sloan Management Review* (July 15, 1995).