

Public comment  
on G.1

 Outlook

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public comment on agenda item G1

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From Caroline Griffith <griffithcarolinec@gmail.com>

Date Mon 5/11/2026 11:23 AM

To COB <COB@co.humboldt.ca.us>

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Supervisors,

First, thank you for your in-depth conversation about creating a civilian review board for Sheriff's Office policy and practices. We appreciate your previous decision to come back to the board with an ordinance. In light of the unfortunate need to redo this conversation I want to take the opportunity to address one of the questions that came up during the previous meeting.

In many other jurisdictions that have enacted ordinances like this, they contract with specialized firms to fill the role of Independent Auditor or Inspector General. This way they can utilize subject-matter experts rather than having to create a new position and train someone to do this work. The City of Eureka Community Oversight on Police Practices Board contracts with OIR Group (<https://www.oirgroup.com/>). On their website you can find a list of reports they have done for various cities (including Eureka and a report for HSU in 2020) to get an idea of how they work.

We are very fortunate in that other jurisdictions across the state and nation have already established boards like this so we can look to them for best practices. There is also a national organization, the National Association for Civilian Oversight of Law Enforcement (<https://www.nacole.org/>) that can be used as a resource while putting together an ordinance.

I want to reiterate that the components that make a board like this effective in improving public safety and confidence in law enforcement are open meetings, subpoena power, and the establishment of an Inspector General. I strongly urge you to move forward (again) with establishing a board that has these components, and to do so in a timely fashion.

Thank you,  
Caroline Griffith  
District 1 resident

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**Fwd: Sheriff's Accountability and Review Board**

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**From** Jennifer Whiteside <jen.annwhiteside@gmail.com>

**Date** Mon 5/11/2026 10:51 AM

**To** COB <COB@co.humboldt.ca.us>

**Cc** Arroyo, Natalie <narroyo@co.humboldt.ca.us>

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Forwarding to the Clerk of the Board and including Supervisor Arroyo.

Best regards,  
Jennifer Whiteside  
(*She/her - [here's why](#)*)

----- Forwarded message -----

**From:** **Jennifer Whiteside** <jen.annwhiteside@gmail.com>

**Date:** Sun, May 10, 2026 at 5:28 PM

**Subject:** Sheriff's Accountability and Review Board

**To:** <narroyo@co.humboldt.ca.us>

Hi Supervisor Arroyo,

I am advocating for a Sheriff's Accountability and Review Board with these three core functions:

1. Civilian Oversight Board: People who live in Humboldt County who should have access to understanding the sheriff's policies, procedures, and actions
2. Independent Inspector General: An expert in policing who will provide an unbiased analysis
3. Subpoena power: Allows an inspector to compel documents and testimony directly if problems arise, strengthening transparency and accountability

I am advocating for this because it increases accountability for the Sheriff's department, as well as transparency. Given the current climate around policing, especially when it comes to BIPOC and/or people with mental health crises, having less secrecy around the use of force, conditions in the jail, and can help build public trust when it is at a low point.

Best regards,  
Jennifer Whiteside  
(*She/her - [here's why](#)*)

## Sheriff's Accountability and Review Board

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**From** Laura Muñoz <lanativa@gmail.com>

**Date** Mon 5/11/2026 10:46 PM

**To** COB <COB@co.humboldt.ca.us>; Bohn, Rex <RBohn@co.humboldt.ca.us>; mbushnell@co.humboldt.ca.us <mbushnell@co.humboldt.ca.us>; Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>; Madrone, Steve <smadrone@co.humboldt.ca.us>

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Dear Clerk of the Board and Humboldt County Supervisors,

I am writing to advocate for the establishment of a Sheriff's Accountability and Review Board. I believe this board should include the following three core functions:

1. Civilian Oversight Board: A board composed of Humboldt County residents with access to the Sheriff's policies, procedures, and actions.
2. Independent Inspector General: A policing expert to provide unbiased analysis.
3. Subpoena Power: The authority to compel documents and testimony to ensure transparency and accountability.

This oversight is essential to increasing the department's accountability and transparency. Given current concerns regarding policing—particularly its impact on BIPOC communities and individuals experiencing mental health crises—reducing secrecy around use of force and jail conditions is vital to rebuilding public trust.

Thank you for your time.

Laura Muñoz, citizen of Arcata

## Sheriff Oversight please put on record

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**From** B. <villagranbrittney@gmail.com>

**Date** Mon 5/11/2026 9:02 PM

**To** Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>; mwilson@co.humboldt.xn--c-c1a.us <mwilson@co.humboldt.xn--c-c1a.us>; narrovo@co.humboldt.ca.us <narrovo@co.humboldt.ca.us>; Madrone, Steve <smadrone@co.humboldt.ca.us>; COB <COB@co.humboldt.ca.us>

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Hello Board of Supervisors,

I am a concerned citizen, local veterinarian and Arcata resident that is advocating for a Sheriff's Accountability and Review Board with these three core functions:

1. Civilian Oversight Board: People who live in Humboldt County who should have access to understanding the sheriff's policies, procedures, and actions. I will add the oversight community should include constituents of minority ethnicities, queer/trans and disabled community members.
2. Independent Inspector General: An expert in policing who will provide an unbiased analysis
3. Subpoena power: Allows an inspector to compel documents and testimony directly if problems arise, strengthening transparency and accountability

This oversight committee will help the relationship between community members and the police department.

Dr. Brittney Villagran  
[villagranbrittney@gmail.com](mailto:villagranbrittney@gmail.com)

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**Greetings Supervisor Arroyo: More Transparency Sheriffs**

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From Julie McNiel <jamcniel1@gmail.com>

Date Mon 5/11/2026 8:53 PM

To Arroyo, Natalie <narroyo@co.humboldt.ca.us>

Cc COB <COB@co.humboldt.ca.us>

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Dear Supervisor Arroyo and Fellow Humboldt Co Supervisors,

My name is Julie and I am writing to urge you to support the matter of the "Public Trust and More Democracy in Policing" item 1.2 being discussed tomorrow, Tuesday morning, May 12, 2026. This is scheduled as the first item after consent.

We do need more accountability in the Sheriff's Office. I support democratic principles in our government, and heartily encourage you to, as well!

These 3 Core Principles are very important:

- Civilian Oversight Body
- Independent Inspector General (expert, unbiased analysis of policy)
- Subpoena Power

We need more transparency and accountability so as to bring greater professionalism to policing; to build public trust; and create more opportunity for community engagement and understanding. With your support of these principles, the ordinance will bring long term benefits for the people of Humboldt, especially those historically denied a voice.

Thank you so much for your time and consideration!

Sincerely,  
Julie McNiel and Family,  
Eureka, CA. (Bayview neighborhood).



Outlook

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**Agenda item G1 (26-434): Establishment of an Independent Civilian-Led Oversight System for the Humboldt County Sheriff's Office**

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From Kendall Finch <kendallpfinch@gmail.com>

Date Mon 5/11/2026 8:04 PM

To COB <COB@co.humboldt.ca.us>; Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>; Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>; Madrone, Steve <smadrone@co.humboldt.ca.us>

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Dear Board of Supervisors,

I am writing to reiterate my strong support for Humboldt County setting up a policy and practice board to audit and assess the Humboldt County Sherriff's Office, along with a strong and independent Inspector General. It is important for Humboldt County residents to have a voice in how we are policed. Independent oversight boards like the proposed PPB help promote transparency, accountability, and integrity within policing organizations and protect our rights as residents of Humboldt County.

Eureka has already created such a board for our police department, which has been successful and shows that this can work in our community. I ask that you please move forward with creating a HCSO Policy and Practice Board.

Thank you for your time and consideration,  
Kendall Finch  
District 1 resident

**Fw: sheriff review board**

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**From:** Arroyo, Natalie <narroyo@co.humboldt.ca.us>  
**Date:** Mon 5/11/2026 7:57 PM  
**To:** COB <COB@co.humboldt.ca.us>

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**From:** Pat Kanzler <rivndell7@gmail.com>  
**Sent:** Monday, May 11, 2026 7:54:40 PM  
**To:** Arroyo, Natalie <narroyo@co.humboldt.ca.us>  
**Subject:** sheriff review board

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Natalie

I would like to lend my endorsement to a sheriff review board; we desperately need this to help with the climate around this county, country and world with regards to policing, and especially the use of any force...the people of this world, be they any color, need to feel safe in their homes, and ironically, it is not from criminals as much as police or armies. Please lend transparency to this issue and grant us a review board made up not of police or retired police or sheriffs, but regular working or retired civilian so they can understand and correct the procedures, policies and actions of the sheriff's office; and with it subpoena power to compel documents and testimony if problems arise which will strengthen transparency and accountability.

Again, this should be a civilian board, not a police or sheriff board.  
Pat Kanzler, RN

sheriff review board

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From Pat Kanzler <rivndell7@gmail.com>

Date Mon 5/11/2026 7:56 PM

To COB <COB@co.humboldt.ca.us>

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to whom it may concern

I would like to lend my endorsement to a sheriff review board; we desperately need this to help with the climate around this county, country and world with regards to policing, and especially the use of any force...the people of this world, be they any color, need to feel safe in their homes, and ironically, it is not from criminals as much as police or armies. Please lend transparency to this issue and grant us a review board made up not of police or retired police or sheriffs, but regular working or retired civilian so they can understand and correct the procedures, policies and actions of the sheriff's office; and with it subpoena power to compel documents and testimony if problems arise which will strengthen transparency and accountability.

Again, this should be a civilian board, not a police or sheriff board.

Pat Kanzler, RN

**Fw: Sheriff's oversight yes!**

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**From:** Arroyo, Natalie <narroyo@co.humboldt.ca.us>  
**Date:** Mon 5/11/2026 6:53 PM  
**To:** COB <COB@co.humboldt.ca.us>

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**From:** ja savage <jasavagehonest@gmail.com>  
**Sent:** Monday, May 11, 2026 2:31:32 PM  
**To:** Arroyo, Natalie <narroyo@co.humboldt.ca.us>  
**Subject:** Sheriff's oversight yes!

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

For such a tough guy, he fears a little citizen input. Pah.

J.A.Savage  
Eureka

**Fw: Sheriff's department advisory board**

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**From:** Arroyo, Natalie <narroyo@co.humboldt.ca.us>

**Date:** Mon 5/11/2026 6:53 PM

**To:** COB <COB@co.humboldt.ca.us>

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**From:** Chris Jenkins <chrisjenkins1962@gmail.com>

**Sent:** Monday, May 11, 2026 6:33:25 PM

**To:** Arroyo, Natalie <narroyo@co.humboldt.ca.us>

**Subject:** Sheriff's department advisory board

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Supervisor Arroyo, my name is Chris Jenkins. I worked in law enforcement for 28 years. I have to tell you, it's a little disappointing that Sheriff Honsal is taking such a negative stance on the review board.

We had one, but it was called a "Citizens Advisory Board". Not a review board. Our board was a great help to the Department, the city, and yes to the Officers.

This is not a them against us, or it shouldn't be. There is nothing wrong with having a second set of eyes helping, and that's what a Advisory board should do is help, not place blame. Done properly the Advisory protects the citizens, city or county, and the Officers. I truly believe that you all (Supervisors) gave the chance to effect a positive change for the citizens, the county, and the Sheriffs Department.

Thank you for your time  
Chris Jenkins

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Transparency and accountability for the sheriff's office: item 1.2

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From amelia vanderford <ameliarvanderford@gmail.com>

Date Mon 5/11/2026 1:10 PM

To COB <COB@co.humboldt.ca.us>

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

To whom it may concern,

I'd like to offer public comment about Item 1.2 for the 5/12/26 meeting on the topic of Transparency and accountability for the sheriff's office.

I work at a school in Arcata that has students that attend from Loleta up to Trinidad. This means when I make child abuse reports, sheriff officers often respond to the reports instead of or before CPS workers.

Since 2024, Sheriff officers have continuously put school staff, families, and students at risk when responding to these reports. Families have reported that sheriff officers will tell them who made the child abuse reports which has put those staff members at risk. In 2025, an officer interviewed a victim-child with an abusive parent present and on school campus in a space that was not confidential (door open room in shared space). Which led to the child not giving an honest interview and for other students' on campus to question the child about why police wanted to speak with him. This same officer pushed back against staff requests to give contact information or an identification card asking "Why are you asking for one?"

When conducting interviews with the children with me present, officers do not hold trauma-informed body posture or language. An officer who was being trained by a senior officer asked for an interview of a 4 year old child with guns on their hip and asked the child "Can I see your face where you were hit?", and then left. When I asked about the rest of the interview I was told they were only here to see if the child had a bruise.

Another responding officer told parents who hit their kids in the face that "what happens at school and what happens at home is different, we can parent how we feel we need to".

Sheriff's have caused harm for students in their breaches of confidentiality where they put educators at risk by outing them as the reporter, they don't provide trauma-informed care, and they normalize abusive behavior.

When I have attempted to file complaints to the department, the sheriff's department has requested that I breach confidentiality of students to obtain the sheriff's information rather than acknowledge the trend of harm and retrain their department.

I have evidence that the sheriff's office has harmed Humboldt County families and educators and think it is important that oversight happens for the department.

Please call for more information  
Amelia Vanderford

An Arcata Resident, Educator, and Community Member

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## Sheriff's Accountability and Review Board

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From VICTORIA MONROE <vhmonroe@aol.com>

Date Mon 5/11/2026 11:59 AM

To COB <COB@co.humboldt.ca.us>; smadrone@humboldt.ca.gov <smadrone@humboldt.ca.gov>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Good Afternoon Mr. Madrone and Clerk for the Humboldt County Board of Supervisors,

My name is Vicky Reinsel. I live in McKinleyville.

It has come to my attention that the establishment of a Sheriff's Accountability and Review Board is being proposed. I am in favor of this and am encouraging you to support its development. I applaud the good work that the Sheriff's Department does, and I believe greater transparency will expose it—and lead to reciprocal cooperation and goodwill between residents and police while also ensuring fair application of the law.

In that vein, I'd like to see a Civilian Oversight Board established so that the good people of Humboldt County can better understand the Sheriff's policies, procedures, and actions. That greater understanding will lead to smoother community and law-enforcement interaction.

In the interest of true transparency, there should be an Independent Inspector General. That expert's unbiased analysis would give the community more confidence in the Department's decisions and operations.

In furtherance of that goal, the newly appointed Inspector should be granted subpoena power. It is through this transparency and accountability that the public will feel confidently assured that when problems arise, all of the related documents and testimony will be considered.

Implementing these measures would surely only improve the relationship between the Sheriff's Department the people they serve in Humboldt County. Providing and ensuring safety and security is never convenient, but gaining the confidence of the people by taking extra steps via creating a Sheriff's Accountability and Review Board will go a long way to improve the environment in Humboldt County.

Sincerely,

Vicky Reinsel



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RE:Agenda Item 1.2 BOS Agenda for May 12, 2026 -

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From Nezzie Wade <now1@suddenlink.net>

Date Tue 5/12/2026 7:47 AM

To Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>;  
mwilson@co.humboldt.ca.us <mwilson@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>;  
Madrone, Steve <smadrone@co.humboldt.ca.us>

Cc COB <COB@co.humboldt.ca.us>

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Today the Humboldt County Board of Supervisors is considering whether or not to implement civilian oversight of the sheriff's department. This meeting needs to be cancelled and rescheduled in the best interest of the Humboldt community. This item is a rushed injustice to the community of Humboldt by being brought to the Board on short notice as the public was anticipating from the previous meeting on April 28th that this topic would be brought back in September giving the community an opportunity to respond effectively.

At such time as this is brought to the Board appropriately, I want to ensure that my voice is heard and that my neighbors also have an opportunity to respond.

This is my position: Sheriff's Accountability and Review Board is essential in Humboldt County. The Sheriff is an elected official with broad power over policing, jails, court services and more.

Counties in California can create civilian oversight boards and Inspector Generals with powers to investigation, engage in policy review, and subpoenas.

These boards assist county supervisors in overseeing sheriffs, who historically claim independence from local government control. In light of this, I believe we need and I am advocating for a citizen-led oversight board made up of people who live in Humboldt County and should have access to understanding the sheriff's policies, procedures, and actions.

I am also advocating for an independent Inspector General, an expert in policing that will provide an unbiased analysis and subpoena power to allow an Inspector to compel documents and testimony directly if problems arise, strengthening transparency and accountability. Important considerations in advancing the Civilian Oversight - Sheriff's Review Board - include the following:

- Increased accountability with Independent review that double-checks "policing themselves" - seen as a check on concentrated power.
  - Inspector General can investigate misconduct, use-of-force, jail conditions; seen as a check on concentrated power
- Strong review boards with subpoena power and independent investigators do increase accountability,

greater transparency

- Public reports and hearings and potential subpoena power review internal practices  
Reduces secrecy around use of force, jail conditions, etc. Example: oversight bodies have uncovered deputy gangs and jail abuses  
Oversight bodies can balance transparency with confidentiality—courts and prosecutors already do this.
- Builds public trust and legitimacy:  
Communities—especially historically excluded peoples—feel heard  
Communities are more likely to trust law enforcement when there's independent review  
Long-term trust depends on credibility and honesty, not silence—cover-ups damage trust more.
- Policy improvement & prevention:  
Boards review policies and recommend reforms before crises occur  
Helps identify systemic problems (training, use of force, jail practices)  
Improves policies/procedures and general orders  
Identifies systemic issues and opportunities (training, procedures, culture)  
Can prevent future misconduct rather than just punish past actions ensuring  
Fosters professionalism & professional identity – better recruitment/reputation
- Democratic input beyond elections. Checks concentrated power  
Elections are infrequent and do not allow reflections on policies once in practice  
Oversight provides ongoing accountability, not just every 4 years  
Sheriffs often control policing, jails, and budgets  
Oversight adds a check similar to checks and balances already in government (such as review of the Board of Supervisor's policies)

We need first to stop this meeting today. It is an injustice to the community. And when the vote for a Citizen-Led Oversight System for Humboldt County does come to the Board, I urge you to work hard at making the language of the County Sheriff's Policy and Practice Ordinance specific and comprehensive including the Citizen Oversight Board, an independent Inspector General and Subpoena power. Thank you for your time and hard work.

Sincerely,

Nezzie Wade  
Eureka Resident

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## Independent Police Oversight and Review

### EXPERIENCE AND EXPERTISE

Widespread protests and spiraling jury verdicts reflect the public's increasing concern about law enforcement performance – and its high expectations for responsive policing. OIR Group works with local governments, community members and police agencies to address these contemporary challenges and collaborate on sustainable reforms.

Led by a veteran former federal civil rights prosecutor, the OIR Group team features some of the nation's most experienced police practices and oversight professionals. Our commitment to rigorous review and innovative practices helps make law enforcement agencies more effective and more accountable.

Read more about who we are and how we work. Then let us help bring meaningful change to your community.

### RECENT NEWS

#### FEATURED WORK

OCLEM Report on the Sheriff's Office Use of Chemical Agents in Planned Use of Force Incidents (Santa Clara County), August 29, 2023

OCLEM Report to the Board of Supervisors regarding the August 2019 In-Custody Incident Involving J.N. (Santa Clara County), May 16, 2023

Public response to OIR Group's annual report on police shootings in Portland. (View the full video by clicking here.)

## AREAS OF SERVICE

- Comprehensive Assessment of Law Enforcement Agencies
- Critical Incident Review and Analysis
- Conduct and Evaluate Training
- Policy Assessment
- Complaints and Internal Investigations
- Discipline System Integrity Audits
- Design and Evaluation of Oversight Systems
- Evaluation of Adverse Civil Litigation
- Assessment of Criminal Investigations
- Custody and Juvenile Detention Issues
- Subject Matter Experts for Panels and Presentations

Independent Review of the Officer-Involved Shooting of Anthony McClain (Pasadena, CA), April 2023

Independent Review and Analysis of the Officer-Involved Shooting Death of Jacob Macduff (Tigard, OR), February 2023

Report to the City of Portland on Portland Police Bureau Officer-Involved Shootings and Critical Incidents, Eighth Report, January 2023

Independent Review of Kalamazoo Department of Public Safety in Two 2020 Critical Incidents: Comparison, Analysis, and Recommendations, August 2021

City of Santa Monica: Independent After Action and Evaluation Regarding the Events Leading to, During, and Following May 31, 2020, March 2021

Independent Report on the Santa Rosa Police Department's Internal Investigations Re Protest Activity, April 2021

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We approach each project from an independent perspective, understanding that organizational problems require solutions tailored to the individual needs of the law enforcement agency and the community it serves.

## COMPREHENSIVE ASSESSMENT OF LAW ENFORCEMENT AGENCIES

OIR Group has been repeatedly asked to evaluate the most sensitive and important responsibilities of police agencies, including use of force, internal affairs operations, complaint intake and investigations, training, and accountability. This top to bottom review examines these processes and provides recommendations based on best police practices.

FEATURED WORK: Report to the City of Fullerton: Systemic Review of the Fullerton Police Department, August 2012

## CRITICAL INCIDENT REVIEW AND ANALYSIS

OIR Group has 15 years experience evaluating police shootings, in-custody deaths, and other critical incidents. Our members have rolled out to more than 400 shooting scenes and have observed and consulted on investigations in real time.

OIR Group members have developed a detailed understanding of the activities and commonalities that contribute to unnecessary or excessive force. In countless cases, OIR Group has worked to identify dangerous tactics in critical incidents and worked with agencies to develop remedial action plans to address them -- including accountability, training, policy development, and supervisory issues. OIR Group has also worked with police departments to ensure that their own internal investigation and review processes are thorough and unbiased.

FEATURED WORK: Report to the City of Portland on Portland Police Bureau Officer-Involved Shootings and In-Custody Deaths, 2016  
The In-Custody Death of Robert Ramirez: Independent Review of the Oxnard Police Department's Investigation and Review, January 2016  
Report to the City of Portland Concerning the In-Custody Death of James Chasse, July 2010

## CONDUCT AND EVALUATE TRAINING

OIR Group members have been asked to review law enforcement training at many agencies to assure compliance with principles of constitutional policing, to assess its effectiveness, and make recommendations for reform.

OIR Group members also have developed and delivered training to improve investigative skill sets for supervisors, principles of civil liability, interviewing for investigators, and the California Peace Officers Bill of Rights. We also have advised and trained newly formed civilian police review boards on their roles.

FEATURED WORK: OIR Group is involved in evaluating the New York Police Department's training that stemmed from the judgment in the federal stop and frisk case to ensure that the reforms promote Constitutional interactions between the police and the public.

OIR Group regularly provides POST sponsored training for supervisors on principles of Civil Liability and has provided

oversight training for both the Riverside and Anaheim police review boards.

OIR Group was invited to hold a day-long training in Vancouver on techniques and challenges for use of force investigators at the newly established Independent Investigations Office of British Columbia.

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## POLICY ASSESSMENT

OIR Group has helped police departments draft well-tailored operations policies in difficult subject areas such as post-shooting interview procedures, use of video evidence, Taser use policy, and shooting at suspects in moving vehicles. We also assess the sufficiency and enforcement of existing policies and assist in agencies' reform efforts on use of force, internal investigative and review protocols, internal affairs processes, and disciplinary guidelines.

**FEATURED WORK:** In an independent review of use of force and Internal Affairs operations of the Denver Sheriff's Department, OIR Group evaluated and made recommendations for reforming the Department's use of force and force reporting policies as well as policies related to Internal Affairs functions. Following the release of our report, OIR Group continued to engage with City and County leaders to advise on implementation efforts. Report on the Use of Force & Internal Affairs Operations in the Denver Sheriff Department, 2015).

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## COMPLAINTS AND INTERNAL INVESTIGATIONS

A law enforcement agency's legitimacy depends on its ability to conduct internal investigations into allegations of officer misconduct in a thorough, unbiased manner. We have reviewed internal investigations from a broad variety of law enforcement agencies to identify weaknesses in protocols, training and standards of review. When requested, OIR Group has conducted high profile internal affairs investigations, including the Kelly Thomas internal affairs investigations in Fullerton, California, and several internal investigations of the Oakland Police Department in which the subject officers were supervisors and/or members of command staff.

**FEATURED WORK:** Independent Review of Anaheim Police Department's Use Of Force and Internal Affairs Investigations: Fourth Quarter 2014 and First Quarter 2015

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## DISCIPLINE SYSTEM INTEGRITY AUDITS

OIR Group recognizes the ways in which conscious and unconscious bias can impact internal decision-makers' objectivity and has worked to find ways to insulate the decisions from those influences. We also understand the importance of identifying problematic trends among officers and have evaluated early warning systems, disciplinary systems and outcomes to help agencies improve data collection and use of data to address patterns of at-risk behavior.

**FEATURED WORK:** OIR Group undertook an independent review for the King County, WA Auditor's Office of the Sheriff's Department's "early intervention system." Our review evaluated the efficiency of the system's implementation, quantified its timeliness and outcomes, and compared it's overall effectiveness to comparable systems at several other benchmark police agencies.

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## DESIGN AND EVALUATION OF OVERSIGHT SYSTEMS

Independent oversight mechanisms are a key to sustainable reform. OIR Group has been at the forefront of the national effort to create meaningful civilian oversight for over a decade. We have designed and assisted oversight entities for law enforcement agencies to ensure effective monitoring of policies, training, review systems, and accountability mechanisms.

**FEATURED WORK:** As a result of litigation involving the California Department of Corrections and Rehabilitation, OIR Group worked with the federal court judge and the Special Master to create an oversight entity that monitors and provides quality control for

internal CDCR investigations. We also conducted a peer review of the newly created oversight entity for the Court after two years of its existence.

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## EVALUATION OF ADVERSE CIVIL LITIGATION

An adverse civil liability judgment or large settlement agreement can raise concerns about a police agency's broader operational processes. OIR Group has been tasked often with reviewing the allegations that gave rise to the liability and reviewing court transcripts with an eye toward identifying systemic issues that may have led to the exposure. The projects result in recommendations designed to improve procedures and reduce the likelihood of incurring future liability.

FEATURED WORK: Independent Review of the Westminster Police Department, January 2015

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## ASSESSMENT OF CRIMINAL INVESTIGATIONS

OIR Group has been called upon to assess criminal investigations for completeness and alleged bias. We have reviewed these investigations to develop systemic recommendations designed to address community concerns and reduce future allegations.

FEATURED WORK: Review of the Santa Monica Police Department Investigation of Oscar de la Torre, January 2011  
Allegations Surrounding Investigation/Prosecution of Ignacio de la Fuente, Jr., Oakland, CA, January 2008

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## CUSTODY AND JUVENILE DETENTION ISSUES

Through its work with the Los Angeles and Orange County jails, OIR Group has gained a unique perspective on the use of force in custody facilities and the challenges presented by jail settings. OIR Group attorneys also evaluate internal investigations at juvenile detention facilities and design training and policy revisions to reduce misconduct.

FEATURED WORK: Los Angeles County Probation Department Third Annual Report  
Violence in the Los Angeles County Jails: A Report on Investigations and Outcomes, October 2011

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## SUBJECT MATTER EXPERTS FOR PANELS AND PRESENTATIONS

OIR Group members have appeared nationally on police practices and oversight panels and have presented many times at conferences and educational seminars. OIR Group presented written testimony at the request of the President's Task Force on 21st Century Policing.

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TO: City of Eureka Community Oversight Police Practices Board  
FROM: OIR Group  
DATE: October 18, 2023  
RE: Review of Administrative Investigations: Third Quarter

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## Introduction

In its role as the City of Eureka's Independent Police Auditor, OIR Group reviews internal investigations conducted by the Eureka Police Department (EPD) to ensure they are complete, objective, thorough, and fair and that findings and actions taken in response to the investigations are appropriate. We report these findings on a quarterly basis to the community at the Community Oversight Police Practices (COPP) Board meeting.

In the first months of our engagement, OIR Group reviewed cases that had been closed with the Chief's final findings and, when applicable, after discipline had been issued to the subject employee(s).<sup>1</sup> For each of these cases, OIR Group issued a memo outlining the case, EPD's investigation, and our assessment and recommendations. Because

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<sup>1</sup> We did so, in part, because EPD had completed, or were near completion of, these cases prior to the start of our engagement.

each case was closed and complete at the time of our review, our comments could not impact that specific case's outcome. Our recommendations instead were intended to inform the process generally going forward.

But by August of 2023, we had completed reviews of all EPD's closed cases. Rather than wait to review cases after they were closed, EPD requested that OIR Group review open cases and provide feedback in real time. EPD sent cases for our review *before* the case was closed; we worked collaboratively to ensure that investigations were complete, objective, thorough and fair before they were sent to command staff for disposition and closure. This interaction allowed us to provide recommendations that might impact the specific case, as well as offer larger process or policy recommendations.

As a result of this "mid-quarter" review process shift, our report to the COPP Board this quarter includes both types of reviews: individual memos that evaluate completed cases and reporting of our real-time engagement with cases.

## Closed Cases: Case Summaries & Findings

Prior to shifting to real-time case review, OIR Group received and reviewed several cases after they were closed by EPD. For each of these, OIG Group completed an individual review memo; these are attached as Appendix A and contain more detailed information. Here, we provide a very summary of each case and our recommendations.

### Case #22-10

This case involved a complaint of harassment and retaliation. The complainant alleged that EPD officers who responded to a call of a suspicious person had harassed and threatened her when they responded to the call and gave her an unwarranted parking citation.

When EPD contacted the complainant, she withdrew her complaint. EPD chose to investigate it nonetheless, a practice that we recommend. As a result of their investigation, EPD noted that the behavior of the senior employee on scene could have been better, citing a "missed opportunity to de-escalate."

EPD reported that they counseled the involved employees on their response. We recommended that this informal and non-disciplinary counseling be documented and discuss this below.

### Case #22-14

The complainant in this case alleged that an EPD employee made him feel unwelcome in the EPD lobby. When contacted, the complainant stated that he wished to withdraw his complaint. EPD conducted a preliminary investigation of the incident. EPD reported that it provided the employee informal counseling regarding interactions with members of the public but did not document this counseling.

Again, we recommended that these teachable moments be fully documented; see our detailed recommendation section below.

### Case #22-15

This was an internally generated investigation of an animal shooting. As detailed in the memo, officers responded to a trespass call, which resulted in a foot pursuit and an animal shooting.

While we found the investigation to be thorough with respect to the animal shooting (which EPD found to be in policy), we found that the investigation did not meaningfully address the choice to engage in a foot pursuit. EPD conducted a cursory review and found the foot pursuit to be justified. But we recommended that, when reviewing officers' decisions to engage in foot pursuits, the Department should consider *all* the various factors articulated in its foot pursuit policy to assess whether there were safer, reasonably practicable alternatives for apprehending the subject. In the end, the Department might reasonably have concluded the foot pursuit in this case was justified but should only do so after considering all relevant factors.

## Real-Time Collaboration: Case Summaries & Recommendations

As noted in our introduction, EPD requested, and our scope of work envisioned, real-time engagement with the Department before a case was closed. In the following cases, EPD provided the investigative file for our review when it felt that the investigation was sufficiently complete. After constructive dialogue, we provided feedback and recommendations, which EPD often adopted before the case was sent to the Chief for final disposition and closure.

The cases reported here are now officially closed.

## Case #22-04

In this case, the complainant felt that she was being harassed for parking her vehicles in front of her residence for several days. When the complainant moved one of them to a different location, the vehicle was vandalized and then later stolen.

The complainant called EPD to file a stolen vehicle report. The employee who responded told her that, because the vehicle was not formally registered to her or family, EPD could not take a police report. She filed two complaints about the matter, stating she was unfairly harassed and that EPD refused to file a report.

The investigator called the complainant nearly a year later. They spoke at length about the incident and the complainant's hoped-for outcome. The complainant said she felt heard, but also reiterated that her family was upset, and that she felt targeted and harassed. The investigator indicated they would look into it.

The investigator reviewed the calls for service, body-worn camera footage, and the related citations and police reports for compliance with law and policy. One of the involved employees submitted a voluntary written statement detailing the incident and rationale for actions taken. Using this evidence, the investigator determined that the actions of EPD employees had not violated any Department policy or City law and requested to close the investigation.

While we agreed with the ultimate outcome based on the evidence provided, we and EPD identified procedural issues with this case, which we discussed with EPD.

First, the assignment and investigation of this case was not timely. Overall, delays in initiation of an investigation can have potential consequences. Apart from the inherent value of addressing personnel issues promptly and maintaining the public's trust in the process, the time lags can affect the quality of available evidence and available disciplinary outcomes if misconduct is discovered.

EPD acknowledged that timeliness was a significant concern in this case specifically and for IA, generally. EPD has since remediated by hiring personnel to work in IA. We are now seeing cases completed in a timely manner and will continue to track progress on this issue; we discuss staffing challenges further, below.

Second, this case was classified as a "complaint withdrawn," a classification which we noted in several EPD cases. In this specific case, the classification was apparently made in error, though likely unintentionally.

In the original investigative memo received by OIR Group, the investigator stated that the complainant had requested to formally withdraw her complaints during the intake interview. But when we reviewed the interview, we did not hear the complainant withdraw her complaints or change her mind about the incidents or the employees' conduct. While she seemed satisfied after her lengthy discussion with the investigator, which the investigator may have interpreted as a resolution, she reiterated that she felt harassed and was displeased with the employees' responses.

EPD agreed with our assessment and corrected the investigative memo to reflect that the complainant had not, in fact, withdrawn her complaint.

To his credit, despite believing that the complainant wished to withdraw her complaint, the investigator still collected evidence to support the ultimate outcome. And EPD reported that it spoke to the involved employees about the complaint and their actions. But, as we discuss later in this report, the *process* matters as EPD strives to develop a robust complaint investigation system.

#### Case #22-11

The complainant observed EPD employees "harassing" an unhoused community member. When she attempted to intervene, she alleged that one employee placed his hand on his firearm and aggressively commanded her to leave the area, which she did. Two days later, the complainant was pulled over and arrested for driving with a suspended license.

Over two years later, the complainant submitted a complaint stating that she had been discriminated against for attempting to intervene, falsely arrested, and that the employees were too aggressive when they "pulled her" from her vehicle during the arrest. Further, she alleged that an EPD employee had authored a false police report. The complainant did not provide any employee names.

The investigator was unable to contact the complainant using the number she provided. Rather than end his search, the investigator engaged in an exhaustive search for the complainant, going so far as to drive throughout Eureka to various past known addresses to locate her. He eventually located the complainant and conducted a thorough interview.

The investigator also conducted a detailed search of calls for service, police reports, and arrests on the days in question and was able to identify some of the involved employees. The investigator notified and interviewed these employees.

The investigator then sought body-worn camera footage of the incidents. But due to the length of time elapsed between the events and the complaint, these incidents, while appropriately recorded and retained at the time, had been destroyed per the records retention policy.

The investigator framed five allegations against EPD employees:

- 1: **339.5.3. Discrimination, Oppression, or Favoritism.** The complainant alleged that EPD had discriminated against her when they arrested her because of her prior attempt to intervene in enforcement activity.
- 2: **339.5.9. Conduct.** The complainant alleged that employees exceeded their peace officer powers when they arrested her unlawfully.
- 3: **339.5.9. Conduct Unbecoming.** The complainant alleged that her arrest was unlawful, which reflected poorly on the employee and EPD.
- 4: **339.5.1. Conduct.** The complainant alleged that the employee had violated the law when the employee arrested her.
- 5: **300.3. Use of Force.** The complainant alleged that EPD employees were overly aggressive when they yelled at her, and again when they pulled her from her vehicle during arrest.

Based on the available evidence, the investigator recommended that allegations 1 to 4 be Unfounded: the traffic stop and arrest were lawful and pursuant to a bench warrant.

The investigator recommended that allegation 5 be Not Sustained, which means that the investigation could not prove or disprove the allegation. In the absence of body-worn camera footage, the investigator reviewed the complainant and officer statements of the incident. The complainant recalled that she experienced excessive force. The officer did not, referencing the fact that, had he used force, he would have documented it.

This recommendation is commendable. In other jurisdictions, we have noted that a department often automatically “sides” with its employee, weighing the employee’s account over the complainant’s. Here, the investigator appropriately noted that he did not have sufficient evidence to prove or disprove the allegation.

Indeed, this entire complaint investigation was commendable. We did not identify any concerns with this case; as such, the Chief issued his final dispositions as recommended and closed the case.

## Case #22-12

This investigation was prompted by EPD's receipt of a written complaint that made several allegations against an employee. These exhibited a range in their clarity and plausibility. Nonetheless, once the case was assigned to an investigator, that person made assiduous (but unsuccessful) efforts to locate the complainant to conduct an interview and potentially gain more workable information about the concerns.

It turned out that the complainant – who had a history of police contacts and mental health issues – was related to the employee named in the complaint. The investigator found three somewhat recent calls for service that revolved around the complainant and included a response by the related member of EPD. Body-worn camera recordings showed the communications that occurred between the two in each instance; these primarily involved evaluation of the complainant's well-being and immediate plans for care and shelter. The employee was found to have acted appropriately in the context of each encounter, and other EPD personnel were involved in each instance.

This review of available records was supplemented by an interview with the subject employee, who persuasively denied the misconduct allegations and provided useful context about the complainant's personal history.

The investigator framed several potential policy violations as charges in the case and determined each to be unfounded.

We noted a five-month delay between the submission of the complaint and the initiation of the investigation.<sup>2</sup> However, we found the investigation itself to be thoughtful, rigorous, and effective in dealing with a sensitive situation.

## Case #22-16

This case resulted from a traffic stop. The EPD employee observed two subjects in a vehicle that he believed may be members of a gang. Later, he saw the vehicle pull over in front of a residence. The subject ran inside the residence. The employee requested another unit and approached the empty vehicle to look inside, at which point the subject exited.

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<sup>2</sup> At the time of this investigation, the Department's policy allowed a year for investigations to occur. EPD leadership has since revised the policy to require more timely investigation to align with industry best practices.

The subject identified himself and confirmed that he was on probation with a general search clause. The employee requested that the subject sit on the curb, which he did. Other employees entered the residence to search the subject's room.

An employee handcuffed the subject and detained him in the rear of the police vehicle while a search was conducted, but the subject was ultimately released at the scene.

The subject filed a complaint, stating that he had been harassed and unlawfully detained.

The assigned investigator reviewed all related evidence, including body-worn camera footage and police reports.

The investigator then spoke with the subject on the phone. The investigator asked the subject if the subject thought the employees had engaged in misconduct. The subject responded that he did not know. In response, the investigator stated that EPD had not identified any misconduct, and asked if the subject would like to rescind his complaint. The subject responded that he did not think anything could be done about the incident.

The investigator wrote an administrative memo to document his review of evidentiary materials and his conversation with the complainant. The investigator concluded that no misconduct had occurred, that the employees had acted professionally, and that the subject had withdrawn his complaint.

We discussed this case at length with EPD leadership. EPD highlighted concerns with the complaint intake process, and because of this case has re-evaluated its complaint intake process. Even before our review, EPD reported that it trained all investigators in complaint intake, including taking all complaints as reported by the complainant, offering options to resolve concerns and complaints, and formally documenting the process.

We also discussed our concerns with the actions of employees on scene. First, while the actions of officers on scene were legal, we questioned whether handcuffing and detaining the subject was retaliatory in nature, as employees did so only after the subject asked for names and badge numbers. After conversation with EPD, we learned that employees had other reasons to become concerned for their safety and that, in fact, EPD command would have preferred that, for tactical reasons, the employees handcuff and detain the subject earlier in the encounter.

We understand this perspective. However, the employees' rationale was not documented or included in the administrative memo.

This resulted in two recommendations. First, we recommended that EPD instruct employees to more fully document all rationale for detaining subjects, when practicable, either in real-time (e.g., articulated on BWC) or after the incident in their police reports.

Recommendation Q3 -1: EPD should instruct employees to document all reasons more fully for detaining subjects, when practicable, either in real-time (e.g., articulated on BWC) or after the incident in their police reports.

Second, the lack of documentation suggested that more investigation may have been warranted for this case. For example, the investigator could have asked the employee to articulate his decision-making on scene in an administrative interview. Absent any documented rationale (e.g., in a police report or body-worn camera) and without an administrative interview, all parties are left to speculate why the employees acted as they did.

But, as we noted above in Case 22-04, this case was not investigated further because this complaint was also classified as “withdrawn.”

We discuss our recommendations on this issue further, below.

#### Case #23-10

This complaint originated from a call for service. The subject initially contacted dispatch to request medical aid, stating that he was experiencing what appeared to be a mental health crisis. After extensive conversation with the subject, Dispatch determined that a welfare check by EPD employees would be more appropriate for the circumstances and sent employees to his location.

The responding employee did not initially find the subject at the address provided. Another responding employee recalled seeing the subject walking, and the employees responded to his location. The subject reported that he was walking to the hospital. The subject again requested medical aid. The employees hesitated, and one asked why the complainant could not just continue walking to the hospital. The complainant became very agitated, yelled, and called 911 again demanding an ambulance. By this time, the subject’s father had also responded to the location and confirmed that perhaps an ambulance would be the best choice.

An employee offered the subject a ride, but the subject declined. The subject, still agitated, abruptly turned and walked away, yelling that he would walk to the hospital. This ended the initial contact.

Later, EPD received a call for assistance from the hospital: while being medically treated, the complainant had become aggressive. When hospital staff attempted to restrain him, the complainant kicked a nurse. The staff requested that EPD arrest the complainant for assault.

When EPD arrived, the complainant was seated. He went limp and became a dead weight. EPD employees struggled to physically move him from the facility into the rear of the police vehicle; at one point he rolled off a wheelchair and scraped his elbow on the pavement. With considerable effort, they finally got him seated and secured in the patrol car for transport to the jail. Once at the jail, employees transferred care to the jail staff.

The complainant filed a complaint, stating that employees had refused to call an ambulance to transport him, had used excessive force, and had damaged his property.

EPD reviewed all relevant evidence, including the police reports, dispatch records, and body-worn video camera footage. EPD determined that employees had acted professionally during the encounter and did not use force beyond the physical control holds necessary to move the subject's dead weight from the hospital to the police vehicle. EPD closed the case with an administrative memo.

We reviewed the same evidence. Initially, we questioned why dispatch would send employees for welfare check instead of sending medical assistance as requested. We also sought clarification for the employees' hesitance to request an ambulance when they later encountered the complainant and his father (who also requested an ambulance), and the employee's initial demeanor when he advised the complainant that he should just continue walking (though we do note that the employee offered the subject a ride).

EPD responded that, based on their training and protocol, dispatch appropriately determined that the complainant was not experiencing a medical emergency that would require an ambulance response. Rather, as dispatch documented in the call notes, the complainant was likely experiencing a mental health crisis, which necessitated a welfare check. Later, employees made this same determination: employees determined that the complainant was not experiencing an immediate medical emergency. The complainant then left the location before employees could determine if he met any of the criteria for a mental health hold (e.g., danger to self, others, or gravely disabled, also known as a "5150" hold). Further, reported EPD, the City and County face resource limitations and, as such, cannot send emergency medical aid to requests where the need is not immediately warranted.

We understand this rationale and the resource limitations faced by Eureka and Humboldt County. This is a concern nationwide, and one that often leaves law enforcement responsible for crises calls that might be better suited for behavioral/mental health clinicians. We look forward to working with EPD on this issue, to learning more about their response protocols, and to recommending ways to better serve those experiencing crisis.

Finally, while we agree there was no formal misconduct in this case, we found that employees could benefit from informal counseling on compassionate and appropriate responses to those experiencing a mental health crisis. We discuss this recommendation in greater detail below.

## Policy, Training, or Process Issues

Through our case reviews and collaborative discussions with EPD and the City, we have identified three areas where we can continue to work with the Department to develop policy and procedures for more effective case review. In making these recommendations, we are also mindful that EPD is facing staffing challenges – at the time of publication, the Department has 13 vacant positions. As we work with EPD toward achieving the goals of our recommendations, we will make every effort to streamline and improve processes in ways that do not negatively impact the already-existing staffing challenges.

### Administrative Closure of Complaints

During our time as Eureka's IPA, we have reviewed a number of cases that EPD closed with an administrative memo versus a full, formal investigation.

In two of these, the employee was no longer with EPD and we determined that administrative closure was appropriate.

EPD also used an administrative memo to close out complaints that it determined would not result in sustained findings; that is, after an initial investigation of evidence, such as police reports and body-worn camera footage, EPD determined that the alleged actions either did not occur as alleged (“unfounded”) or occurred but were within policy (“exonerated”). As such, EPD determined that these cases did not warrant any further investigation and closed them without assigning formal dispositions.

When done thoroughly and appropriately, closing a case after an initial investigation proves conclusive can be an appropriate decision. To be clear, EPD's cases, with few exceptions, are well-investigated; IA reviews relevant evidence to determine if any

misconduct occurred and articulates this well in their memos. We recommend that IA take the final steps to thoroughly document the cases and complete them per industry standards.

We will continue to work with EPD leadership on this issue, with the goal of crafting a policy that meets industry standards while ensuring that cases that require formal investigation receive such scrutiny. We have worked with other jurisdictions to create processes for efficiently addressing allegations are clearly unfounded or exonerated based on initial review of evidence, while also requiring proper documentation, disposition, and notification of outcomes. We will explore the use of similar processes in EPD.

It is true that, in our experience, some agencies prefer to avoid “complicating” an officer’s personnel history with complaints that prove to be unsubstantiated. In our view, though, the importance of accuracy and completeness outweighs these concerns. And regardless, disproven cases do not and should not reflect poorly on the individual officer.

Recommendation Q3-2: The IPA and EPD should draft a policy that that meets industry standards while ensuring that cases that require formal investigation receive such scrutiny.

### Managing Withdrawn Complaints

In this period, EPD reported that, after speaking to an IA investigator, two complainants decided to withdraw their formal complaints (see 22-04 and 22-16). To its credit, EPD had already collected sufficient information to determine that the alleged misconduct had either not occurred as described by the complainant or had occurred but was within policy and procedures. EPD closed these cases without further investigation and without findings.

But, as with the administrative closures described above, OIR Group opines that some “complaint withdrawn” cases may merit investigation. The mere fact that the complainant withdraws a complaint alone is not a sufficient basis to close an investigation. Complainants may be motivated by various factors to “withdraw” a complaint, many of them having nothing to do with the legitimacy of the complaint: in 22-16, the complainant was essentially “talked out” of making the formal complaint, and, in 22-04, OIR Group discovered, and EPD agreed, that the complainant had not actually withdrawn her complaint at all.

While EPD corrected these missteps to the best of its ability in these specific cases, and committed to re-training IA investigators on complaint intake, it stopped short of investigating the cases further (in the case of 22-04, the case was already well beyond that statute of limitations). OIR Group recommends that EPD carefully reconsider its response to complaints that it believes to be “withdrawn.” OIR Group recommends that Internal Affairs, in consultation with the Chief and OIR Group, review each withdrawn complaint to ascertain:

- If the complaint process was fully described to the complainant after the complainant expressed his/her wish to withdraw a complaint.
- If the complainant was in any way coerced or convinced to withdraw his/her complaint during the intake interview.
- The nature, severity, and possible disciplinary outcome of the allegations in the withdrawn complaint.

If the allegations are of a serious nature, or indicate a need for directed training, counseling, or other action, EPD should investigate. EPD leadership has expressed that it is committed to this process; we will continue to work with EPD to ensure that all complaints, regardless of whether they are withdrawn, receive the appropriate level of investigation, findings, and documentation.

### Documentation of Informal “Teachable Moments”

As exemplified by the cases detailed in this report, every complaint, whether internally or externally generated, provides an opportunity for EPD to engage in critical evaluation. Nine months into our engagement, EPD has already acted to formally modify policy or to reconsider its general policing philosophy (for example, how it will respond to calls for service regarding civil matters) in response to issues identified in complaints. And, in cases where allegations are sustained, EPD provides the appropriate corrective action and discipline.

EPD reported that complaints sometimes allowed for “teachable moments,” or ways that the officers may have done better in response to a call for service. For example, in the case where a complainant felt unwelcome by staff in the Department lobby, EPD reported that it had spoken to the employee about the incident and encouraged a more pleasant disposition toward the public. However, this commendable action is seldom documented.

Here again, we have engaged in robust discussions with EPD leadership over how best to balance our recommendation to document these important conversations against any

legal implications, impact to employee morale, and perceived increased workload of documenting “teachable moments.”

We maintain that documenting these actions as they relate to a specific complaint is in the best interest of a department and its employees. From an individual officer’s perspective, documentation – even informal – allows for tracking behavior over time; this may result in positive evaluations as the officer shows growth or, conversely, may uncover an area where an employee may need more formal coaching or training. This also serves as effective risk management, as it ensures that the action actually occurred, and allows external auditors, such as the IPA, to track these actions. We also find that transparent reporting, including noting these commendable informal corrective actions, is a large part of gaining community trust.

We acknowledge the Department’s concerns about documenting specific critiques and will continue our discussions with Department leadership about how best to implement our recommendation.

Recommendation Q3-3: EPD and the IPA should collaborate to determine the best mechanism to document actions taken in response to a complaint.

Overall, we are pleased to report that EPD has been receptive to our recommendations thus far. We have reviewed several very thorough and fair investigations and see that there is room for improvement. Our robust discussions and EPD leadership’s willingness to collaborate assure us that EPD is committed to working with the IPA to make continued improvements.

# Appendix A: Case Review Memos



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TO: City of Eureka  
FROM: OIR Group  
DATE: June 7, 2023  
RE: Review of Administrative Investigation – #OIR22-10

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## Introduction

In its role as the City of Eureka's Independent Police Auditor, OIR Group reviews internal investigations completed by the Eureka Police Department (EPD) to ensure they are complete, objective, thorough, and fair and that findings and actions taken in response to the investigations were appropriate.

## Case Summary and Investigation

A complainant submitted a form she had filed online with the U.S. Department of Justice Civil Rights Division, then printed and mailed to EPD. The complaint lists "profiling, stalking, harassment, and retaliation" without further detail.

The case stemmed from a response to a call for service: two EPD employees responded to a report of suspicious persons tampering with a vehicle at the location. These employees approached her car at around 1:30AM. She was standing beside the open driver's door talking to a man who was holding a bicycle. The employees began talking to the complainant, who immediately walked away from them. The employees later learned the car's registration was expired, and began talking to the bicyclist, explaining the nature of the suspicious persons call. The complainant returned, complaining that officers were stalking and harassing her.

While the employees were asking her about her registration, the complainant called 911, claiming she was being harassed and bullied, and would be pressing charges with the Department of Justice and the FBI.

She then asked for the employees' badge numbers. The senior employee on scene provided a badge number and name. When the complainant asked how to spell the name, the employee told her to read it off the name plate affixed to his uniform. Other employees provided their names and badge numbers.

She said, "I am reporting you to the Department of Justice for harassment and stalking." She continued to go on about suing the officers, and again called 911 while officers were still on scene.

The senior employee continued to engage with the clearly agitated complainant, arguing that they hadn't done anything to harass or threaten her. Indeed, the employees had been calm and only tried to talk to her about her registration. Ultimately, the employee wrote a parking citation and left it on her windshield. She took it and drove away.

The complainant successfully challenged the parking citation by eventually providing proof that her registration was valid.

## EPD's Investigation and Analysis

When the EPD investigator contacted the complainant, she told them the matter had been taken care of and they didn't need to look into it any further.

Despite the complainant's withdrawal of her complaint, the investigator completed the investigation. The investigator reviewed the body-worn camera footage and concluded the officers wrote a valid ticket and did not violate any policies. But the investigator also found that the senior employee might have further agitated the complainant by refusing to spell the employee's last name, instead directing her to read it off the name plate. The investigator described this as a "missed opportunity to de-escalate" the encounter, but did not document any actions taken to address this issue with the officer.

The investigation was closed without any formal Department finding or action.

## OIR Group Review

We reviewed the complete case file. We do not disagree with the closure of the IA investigation, based on the complainant's withdrawal of her complaint and the body-worn camera footage. However, we agree that the lead employee's demeanor with the complainant could have been better. Beyond the refusal to spell the employee's name

for her, the employee also continued to argue with her when it should have been clear that she was reacting in a way that evidenced a mental health concern. Continuing to engage only further agitated her and exacerbated her belief that she was being harassed.

This case presented an opportunity for addressing the employee's communication skills, particularly with subjects who are in some type of mental health crisis. Especially in cases like this, where there was at least one new officer at the scene, EPD should identify the chance to discuss ways in which the overall approach to the scenario could be improved. We were advised that some informal counseling did occur in this case; we recommend that the Department document that type of remediation in future cases.



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TO: City of Eureka  
FROM: OIR Group  
DATE: July 16, 2023  
RE: Review of Administrative Investigation – OIR 22-014

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## Introduction

In its role as the City of Eureka's Independent Police Auditor, OIR Group reviews internal investigations completed by the Eureka Police Department (EPD) to ensure they are complete, objective, thorough, and fair and that findings and actions taken in response to the investigations were appropriate.

## Case Summary and Investigation

Complainant contacted a City employee to complain about an unprofessional encounter he had with an employee in the lobby of the Police Department when he had gone to EPD to update his mailing address.

## EPD's Investigation and Analysis

The investigator interviewed the complainant in person. The complainant said he could not remember anything the employee said to him, but that the employee looked at him in a way that made him feel unwelcome. The complainant believed that EPD should give the employee a "talking to" about how to treat people, but ultimately said he wished to withdraw his complaint. The investigator requested the investigation be closed.

## OIR Group Review

We reviewed the complaint and the investigative file. We also spoke with EPD and learned that management had made the employee aware of this complaint and provided informal counseling about making sure members of the public feel welcome in the Department's lobby. We find the decision to close this investigation was reasonable.



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TO: City of Eureka  
FROM: OIR Group  
DATE: October 6, 2023  
RE: Review of Administrative Investigation – OIR #22-15

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## Introduction

In its role as the City of Eureka's Independent Police Auditor, OIR Group reviews internal investigations completed by the Eureka Police Department (EPD) to ensure they are complete, objective, thorough, and fair and that findings and actions taken in response to the investigations were appropriate.

## Case Summary and Investigation

Officers responded to a retail establishment to remove two individuals suspected of trespassing. They learned that both individuals had outstanding warrants, and both fled. Officers went in foot pursuit and caught one individual, while the second subject continued to flee. An officer heard the broadcast of the pursuit while in the officer's patrol car, and then observed the subject run into a greenbelt. The officer broadcast that the officer was going into foot pursuit, exited the vehicle, and entered the greenbelt through a large hole in a chain-link fence.

Almost immediately after the officer passed through the fence, a dog charged at the officer out of an encampment in the greenbelt. The officer drew the officer's handgun and discharged the firearm three times, killing the dog, who had advanced to within three to five feet of the officer. The dog's owner and others from the encampment began yelling at the officer as the officer backed up through the hole in the fence, still

holding the firearm at the officer's side. The officer ordered the bystanders to stay back while keeping the gun at "low ready" and waiting for other officers to arrive and assist.

## EPD's Investigation and Analysis

EPD conducted a thorough investigation of this incident, including reports from all involved and witness officers, interviews of civilian witnesses, review of body-worn camera footage, and two separate administrative interviews of the shooting officer.

The Department evaluated the officer's actions for compliance with several different EPD policies.

- Policy 312.7.1 DESTRUCTION OF ANIMALS

The policy authorizes officers to use firearms to stop an animal in circumstances where the animal poses an imminent threat to human safety and there are no other alternatives available. Here, the dog aggressively charged the officer immediately as the officer entered the area of the encampment and, as articulated in the officer's interview and depicted on body-worn camera, the officer had very little time to react or employ other alternatives to stop the dog. An independent witness who was present in the encampment provided a statement confirming that no one had physical control of the dog at the time the officer entered the area.

The Department concluded the officer's use of a firearm was within policy.

- The Department also concluded the officer complied with policies regarding report preparation and activation of body-worn cameras.
- Finally, the Department evaluated the officer's decision to initiate a foot pursuit. EPD concluded that the officer did not violate policy in deciding to pursue based on the fact the officer had information that the subject had outstanding warrants and was fleeing from police.

## OIR Group Review

We reviewed the complete case file, including the body-worn camera footage. We found the investigation to be thorough and EPD's finding with respect to the shooting to be reasonable.

The Department's review of this incident, however, did not meaningfully address the foot pursuit in light of EPD policy. Policy 458.2 – FOOT PURSUITS – begins with a statement about an officer's decision to pursue:

*The safety of department members and the public should be the primary consideration when determining whether a foot pursuit should be initiated or continued. Officers must be mindful that immediate apprehension of a suspect is rarely more important than the safety of the public and department members.*

The policy includes a list of guidelines that officers should consider when deciding whether to engage in or continue a foot pursuit that is consistent with this view, and instructs that officers "should consider alternatives" to pursuing when, among other things, "[t]he officer is acting alone."

This directive is based on the fact that single officer foot pursuits can present a number of officer safety concerns. For example, the subject being pursued determines the path of the pursuit and has a tactical advantage and has the opportunity to ambush the pursuing officer. A long foot pursuit also can leave an officer (who is weighed down by necessary gear on his or her belt) winded, and the exhaustion can compromise the officer's tactical skills and decision-making ability. The dynamic of a solo officer foot pursuit is also unsafe for the public and the subject being pursued, as the heightened sense of danger faced by officers in this scenario may cause the officer to mis-perceive potential threats.

Here, the officer was acting alone when the officer decided to enter the greenbelt to pursue the subject. Being attacked by a dog was just one of many possible bad outcomes in this scenario. Given the Department's preference – as stated in policy – for not having officers engage in solo foot pursuits, the Department's review of this incident should have discussed the officer's alternatives in a more substantive way. For example, could the officer have waited for backup while communicating the subject's location and coordinating a containment? Given that officers knew the subject's identity, would it have been reasonable to wait and apprehend him at a later time?

Instead, the Department essentially concluded the pursuit was justified because the subject was fleeing officers who had the legal right to arrest him.

When weighing an officers' decisions to engage in foot pursuits, we recommend the Department more meaningfully engage with the various factors articulated in its foot pursuit policy to assess whether there were safer, practicable alternatives for apprehending the subject. The Department should view cases such as this one as

opportunities for training and reinforcing its expectation that officers will consider their own safety and the safety of others before engaging in potentially dangerous foot pursuits.

**Recommendation 22-15:01:** When reviewing officers' decisions to engage in foot pursuits, the Department should consider all of the various factors articulated in its foot pursuit policy to assess whether there were safer, reasonably practicable alternatives for apprehending the subject.

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5/12/26 agenda item I.2 - public comment

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From Julie Slater <jnslater@gmail.com>

Date Tue 5/12/2026 9:19 AM

To COB <COB@co.humboldt.ca.us>

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello,

I am reaching out to advocate for a Sheriff's Accountability and Review Board, including a civilian oversight board, an independent inspector general, and subpoena power. Given the state of our political climate, this is an urgent (and frankly overdue) need for the safety of our most marginalized community members. Thank you for your time.

Julie Slater North

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~Julie

*"Justice is what love looks like in public." - Cornel West*

**Public Comment - Item I.2**

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From Archer Keech <archerkeech@ik.me>

Date Tue 5/12/2026 9:19 AM

To COB <COB@co.humboldt.ca.us>

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello,

My name is Archer. I am writing this comment in response to agenda item number I.2.

I am advocating for a Sheriff's Accountability and Review Board with these three core functions:

1. Civilian Oversight Board: People who live in Humboldt County who should have access to understanding the sheriff's policies, procedures, and actions. I will add the oversight community should include constituents of members of local indigenous tribes, minority ethnicities, queer/trans and disabled community members.
2. Independent Inspector General: An expert in policing who will provide an unbiased analysis
3. Subpoena power: Allows an inspector to compel documents and testimony directly if problems arise, strengthening transparency and accountability.

Thank you.

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**Support for Civilian Oversight Ordinance -- Second District Constituent**

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From Sarah Shipley <srs511@icloud.com>

Date Tue 5/12/2026 12:51 PM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Supervisors,

My name is Sarah Shipley. I am a Briceland resident and Second District constituent writing in strong support of moving forward with an ordinance establishing independent civilian oversight of the Humboldt County Sheriff's Office, including an independent Inspector General.

I want to be direct about what this is and what it isn't. This is not an accusation against Sheriff Honsal or the deputies who serve this county. It is infrastructure, the kind of institution that good law enforcement agencies increasingly rely on to maintain public trust, catch problems early, and protect both the public and the department itself from preventable failures.

The 2024 Civil Grand Jury made this case plainly. Humboldt County has no adequate independent means for reviewing the Sheriff's Office. Complaints and critical incidents are investigated internally, by the same organization being reviewed. The Grand Jury recommended exactly what is now before this Board: a civilian oversight body with an independent Inspector General. That recommendation has been sitting largely unacted on for two years.

The evidence that independent oversight works is not theoretical. In Los Angeles County, deputy gangs operated inside the Sheriff's Department for over 50 years and cost taxpayers more than \$55 million in civil settlements and judgments, and none of it surfaced through internal review. It took a civilian oversight commission with a real Inspector General to finally bring it to light. Research from a multi-city study found that departments with independent civilian oversight were 78% more likely to sustain misconduct allegations. Oversight changes what gets found and what gets fixed.

Supervisor Madrone noted at the April 28 hearing that communities with oversight committees have actually saved money from reduced liabilities and lawsuits that more than covered the costs of the oversight body itself. That is consistent with what the research shows.

There is also a local example worth naming. In 2024, the Sheriff told this Board that his Flock license plate reader cameras would respect residents' privacy. Within months, the Lost Coast Outpost found the office was violating both its own ALPR policy and California state law, with outside agencies including federal ones conducting hundreds of thousands of searches of Humboldt residents' data. There were no consequences, because there is no independent mechanism for consequences. That is precisely the gap this ordinance fills.

Sheriff Honsal has argued that existing oversight mechanisms, the Attorney General, the District Attorney, the Grand Jury, are sufficient. But those bodies are not designed for routine, proactive accountability of a local Sheriff's Office. They respond to crises. The whole point of an Inspector General is to catch problems before they become crises, and to give the public a credible, independent avenue for complaints that does not run through the department being complained about.

I strongly support the Board's decision to pursue this through ordinance rather than ballot measure, which will give you the flexibility to strengthen the ordinance over time as you learn what works. What matters most is that the body you create has genuine independence and real investigative authority, including subpoena power. Oversight without teeth has a poor track record. Oversight with real authority has a strong one.

This ordinance is not about the current sheriff. It is about every sheriff, and about what kind of institution this county has ten and twenty years from now. Institutions outlast individuals. The structure you build today is the one that will matter most when something goes wrong.

I urge this Board to move forward with a strong ordinance and to ensure that the ad hoc committee's draft reflects the full scope of what the Grand Jury recommended.

Thank you for your time and your service to this county.

Sarah Shipley  
Briceland, CA  
Second District