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OFFICE OF INSPECTOR GENERAL

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Review of the Civilian Office of Police Accountability's Timeliness Initiative

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City of Chicago Office of Inspector General (OIG)

Review of the Civilian Office of Police Accountability's Timeliness Initiative

From July 2023 through January 2024, the Civilian Office of Police Accountability (COPA) attempted to reduce its backlog of Chicago Police Department (CPD) member misconduct cases 18 months or older via its Timeliness Initiative.

Planned steps within COPA's Timeliness Initiative included:



engaging stakeholders and the public,



completing misconduct cases with "low level" allegations as Non-Disciplinary Closures (NDCs), and



providing training recommendations to CPD in lieu of discipline.

OIG's inquiry assessed whether COPA implemented this effort according to its own guidelines and public statements.

OIG found:



COPA did not strictly follow its own guidelines and expanded the cases eligible for closure under "Phase 2" of the Timeliness Initiative.

COPA did not consider members' complaint histories when evaluating if cases should be completed as NDCs.



COPA made over 700 training recommendations to CPD but did not ensure any of the suggested training was implemented.

Acronyms

BIA	Bureau of Internal Affairs
BSO	Binding Summary Opinion
BWC	Body Worn Camera
CBA	Collective Bargaining Agreement
CCPSA	Community Commission for Public Safety and Accountability
CFD	Chicago Fire Department
CMS	Case Management System
COPA	Civilian Office of Police Accountability
CPD	Chicago Police Department
DCA	Deputy Chief Administrator
DOI	Director of Investigations
DOL	Department of Law
DUI	Driving Under the Influence
FAQ	Frequently Asked Question
FOP	Fraternal Order of Police
FSR	Final Summary Report
IMR	Independent Monitoring Report
IMT	Independent Monitoring Team
IPRA	Independent Police Review Authority
ISR	Investigatory Stop Report
NDC	Non-Disciplinary Closure
OEMC	Office of Emergency Management and Communications
OIG	Office of Inspector General
OPS	Office of Professional Standards
PBPA	Police Benevolent and Protective Association
POD	Police Observation Device
PSIG	Public Safety Inspector General
TIP	Timeliness Initiative Project
TRED	Tactical Review and Evaluation Division
TRR	Tactical Response Report
TSG	Training and Support Group

COPA Documents

Official Name	Report Shorthand	Description
Special Project Process Timeliness Initiative Project – Phase 1	TIP Guidance	Internal document outlining the Timeliness Initiative purpose and providing guidance to COPA staff on how to evaluate cases for closure.
Non-Disciplinary Closure Memorandum	N/A	Memo describing the process and criteria for the Timeliness Initiative. Copies of this document were included within the Case Management System (CMS) investigative file for all Non-Disciplinary Closures.
COPA Timeliness Closure Review Phase 2: FOP Contract/Time Limits	TIP Phase 2 Guidance	Internal document providing new parameters to allow for the expansion of cases eligible for closure before January 27, 2024.
Case Review Trends Memo	N/A	Internal memo written by COPA Supervising Investigators to document observed trends and patterns of concern within investigations closed under the Timeliness Initiative.
COPA Timeliness Initiative Project	TIP Special Report	Report published by COPA in December 2024 summarizing the need for and implementation of the Timeliness Initiative.

I | Executive Summary

The Public Safety section of the Office of Inspector General (OIG) conducted an inquiry into the Civilian Office of Police Accountability's (COPA) Timeliness Initiative.¹ From July 2023 through January 2024, COPA attempted to reduce its backlog of investigations 18 months or older via its Timeliness Initiative. Through this effort, COPA reviewed investigations, completed those with "low level" infractions as Non-Disciplinary Closures (NDCs), and recommended training in lieu of discipline for any allegations which would have been sustained under typical investigative circumstances. The objectives of this inquiry were to describe the investigations completed as NDCs under COPA's Timeliness Initiative and to determine if COPA implemented this effort according to its own guidelines and public statements.

The planned steps within COPA's Timeliness Initiative guidance involved efforts aimed at providing stakeholder notice, ensuring internal evidence files were complete, establishing review criteria to enumerate disqualifying allegations of misconduct for closure under the initiative, sending training recommendations to the Chicago Police Department (CPD or the Department), reaching out to complainants about the initiative, updating COPA's website to provide public information about the Timeliness Initiative, and determining when investigations should be reopened at the recommendation of an external entity.

First, OIG found that COPA only partially implemented its plans for stakeholder engagement and did not ensure that all relevant evidence for each case was uploaded into the investigative database. Missing evidence and missed opportunities to solicit feedback were barriers to thorough oversight of this process. Additionally, COPA did not strictly adhere to its "Review Criteria" guidelines intended to ensure serious misconduct investigations were not closed under the Timeliness Initiative. COPA set narrow parameters for excluding cases, with the result that numerous cases raising serious allegations were closed under the Timeliness Initiative. OIG found COPA limited transparency efforts by abandoning its plan to have Case Liaisons proactively reach out to complainants about their cases and failing to include all publicly promised information on its website. Further, COPA declined over half of the recommendations made by OIG to reopen cases closed under the Timeliness Initiative, despite publicly referring to OIG as a "safeguard" to this process. Separately, COPA expanded the parameters for NDCs during "Phase 2" of the initiative, which allowed for previously disqualified Timeliness Initiative cases, such as unjustified uses of force, to be closed without discipline.

Additionally, COPA did not consider members' complaint histories when determining if misconduct investigations should be eligible for closure under the Timeliness Initiative. Disciplinary history is typically a factor considered in COPA investigations. However, OIG found that several CPD members had multiple investigations closed as NDCs and these members' disciplinary records often reflected similar alleged behavior that was not considered by COPA. Finally, COPA did not verify that CPD implemented any of the training recommendations it made related to misconduct identified within Timeliness Initiative investigations. Despite stating that training recommendations were the appropriate outcome for these investigations, COPA did not confirm the 700 training recommendations it made were in fact implemented by the Department.

¹ COPA refers to this effort as the "Timeliness Initiative" in statements and the "Timeliness Initiative Project (TIP)" within its documentation. Therefore, OIG uses these terms interchangeably within this inquiry.

COPA has reported its aging and open investigations have decreased since the Timeliness Initiative. However, the concerns raised by this inquiry bear consideration as to the wisdom of this case management strategy and serve as a cautionary reminder for COPA to consider as it continues to close cases using non-disciplinary pathways. By administratively closing hundreds of cases COPA may have alleviated its own burden, but it also created a vacuum of accountability within the police oversight system it is mandated to uphold.

II | Background

All Chicago Police Department (CPD or the Department) members are required to comply with Department Rules and Regulations, directives, and orders. As outlined within CPD policy, violations of these requirements are considered misconduct and “will be considered just cause for disciplinary action.”² If a member is alleged to have committed misconduct, a complex process is initiated with distinct steps that—depending on numerous factors—may include an investigation and a multi-phase process to determine appropriate discipline. Further, while an investigating agency may determine that a CPD member committed misconduct and recommend discipline, if the member chooses to challenge the imposed discipline, in some instances it may be overturned by an arbitrator or the Police Board.³ Thus a single misconduct investigation in Chicago’s police disciplinary process may involve several different agencies and take years to resolve.

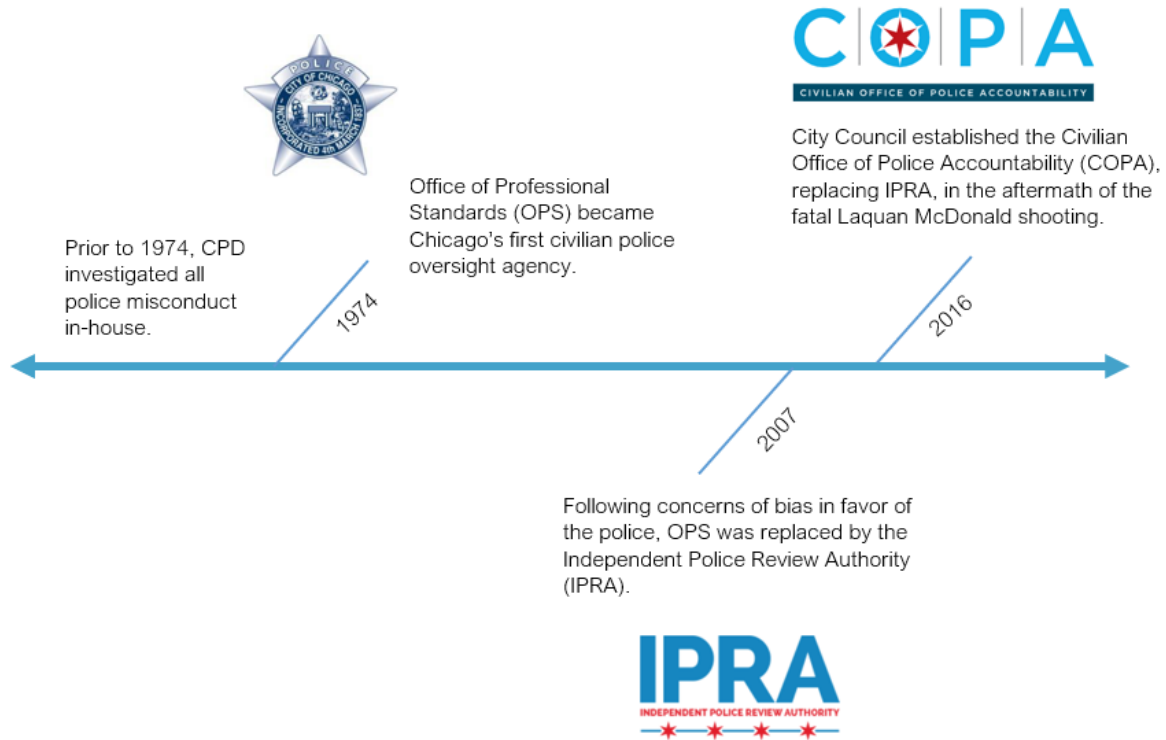
A | Chicago’s Police Misconduct Investigating Agencies

Until the Office of Professional Standards (OPS) was established as Chicago’s first civilian police oversight agency in 1974, all allegations of police misconduct were investigated internally by CPD. Although staffed by civilians, OPS was situated within the Department and its leadership reported to the CPD Superintendent. OPS was dismantled and replaced by the Independent Police Review Authority (IPRA) in 2007. After Laquan McDonald was killed by a CPD member in October 2014, calls for additional police reform and transparency were raised when video footage of the incident, publicly released in 2015, contradicted official CPD accounts of the event.

² Chicago Police Department, “General Order G08-01: Complaint and Disciplinary System,” December 29, 2023, accessed September 3, 2025, <https://directives.chicagopolice.org/#directive/public/6362>.

³ A member’s right to grieve or challenge the recommended discipline depends on the penalty as well as the rank or position of the accused member. For more details on Chicago’s disciplinary system, see OIG’s report on fairness and consistency in the discipline process and a series of flowcharts outlining the process from complaint through implementation. City of Chicago Office of Inspector General, “Fairness and Consistency in the Disciplinary Process for Chicago Police Department Members,” June 16, 2022, accessed May 30, 2025, <https://igchicago.org/wp-content/uploads/2023/08/Fairness-and-Consistency-in-the-Disciplinary-Process-for-Chicago-Police-Department-Members.pdf>. City of Chicago Office of Inspector General, “A Guide to the Disciplinary Process for Chicago Police Department Members,” accessed May 6, 2026, <https://igchicago.org/about-the-office/our-office/public-safety-section/cpd-disciplinary-process-overview/>.

Figure 1: Timeline of Chicago’s Civilian Police Oversight History⁴



Source: OIG visualization

Civilian Office of Police Accountability

In October 2016, the Chicago City Council passed an ordinance establishing the Civilian Office of Police Accountability (COPA), replacing IPRA as the civilian oversight agency for CPD.⁵ COPA was tasked with providing “a just and efficient means to fairly and timely conduct investigations within its jurisdiction, including investigations of alleged police misconduct and to determine whether those allegations are well-founded, applying a preponderance of the evidence standard.”⁶

COPA is responsible for conducting administrative investigations into misconduct allegations and “receives complaints from residents and individual police officers, as well as incident notifications from the Chicago Police Department (CPD).”⁷ COPA serves as the clearinghouse within the police disciplinary system for allegations made against CPD members and “complaints are sorted and

⁴ Figure 1 illustrates Chicago’s civilian-led investigative agencies; however, CPD’s Bureau of Internal Affairs (previously the Internal Affairs Division) continues to internally investigate police misconduct within its jurisdiction.

⁵ City of Chicago, “Journal of the Proceedings of the City Council,” October 5, 2016, accessed September 3, 2025, https://chicityclerk.s3.us-west-2.amazonaws.com/s3fs-public/document_uploads/journals-proceedings/2016/2016_10_05_VI_VII.pdf. COPA officially took over IPRA functions on September 15, 2017.

⁶ MCC 2-78-110. According to COPA’s internal guidance, “a ‘preponderance of evidence’ is evidence indicating that it is more likely than not that a proposition is proved. For example, if the evidence establishes that it is more likely that the misconduct occurred, even by a narrow margin, then the preponderance of the evidence standard is met.”

⁷ Civilian Office of Police Accountability, “Jurisdiction,” accessed September 3, 2025, <https://www.chicagocopa.org/investigations/jurisdiction/>.

classified based on which investigative body has jurisdiction over the matter.” These investigations are maintained within an investigative case management system (CMS) to “ensure robust and accurate collection of investigative information.”⁸ Per ordinance, COPA’s investigative jurisdiction includes the following types of allegations:

Figure 2: COPA’s Investigative Jurisdiction



Source: COPA Website and MCC 2-78-120

Bureau of Internal Affairs

Cases that do not fall into COPA’s jurisdiction are typically referred to CPD’s Bureau of Internal Affairs (BIA) for investigation.⁹ BIA is an internal CPD unit tasked with investigating some allegations of misconduct, such as criminal misconduct and operational violations, by sworn and nonsworn CPD members. BIA is responsible for “coordinat[ing] and exercis[ing] supervision over disciplinary matters involving alleged or suspected violations of statutes, ordinances, and Department rules and directives.”¹⁰ BIA conducts both administrative and criminal investigations.

⁸ BIA investigators also utilize the same case management system for their misconduct investigations. Civilian Office of Police Accountability, “CLEAR and COLUMN CMS Systems,” July 30, 2021, accessed October 15, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/08/COPA-Policy_CLEAR-and-CMS_FINAL_2021-07-30.pdf.

⁹ Although OIG may conduct its own investigations into alleged misconduct by CPD members, in keeping with the objectivity and independence standards governing OIG’s work, OIG does not evaluate its own role in investigating CPD misconduct allegations.

¹⁰ Chicago Police Department, “General Order G08-01-01: Complaint and Disciplinary Definitions,” December 31, 2022, accessed September 3, 2025, <https://directives.chicagopolice.org/#directive/public/6764>.

Office of Inspector General

The Public Safety Section of the City of Chicago Office of Inspector General (OIG) reviews individual closed disciplinary investigations conducted by COPA and BIA. Section 2-56-230(c) of the Municipal Code of Chicago empowers the Public Safety section of OIG to:

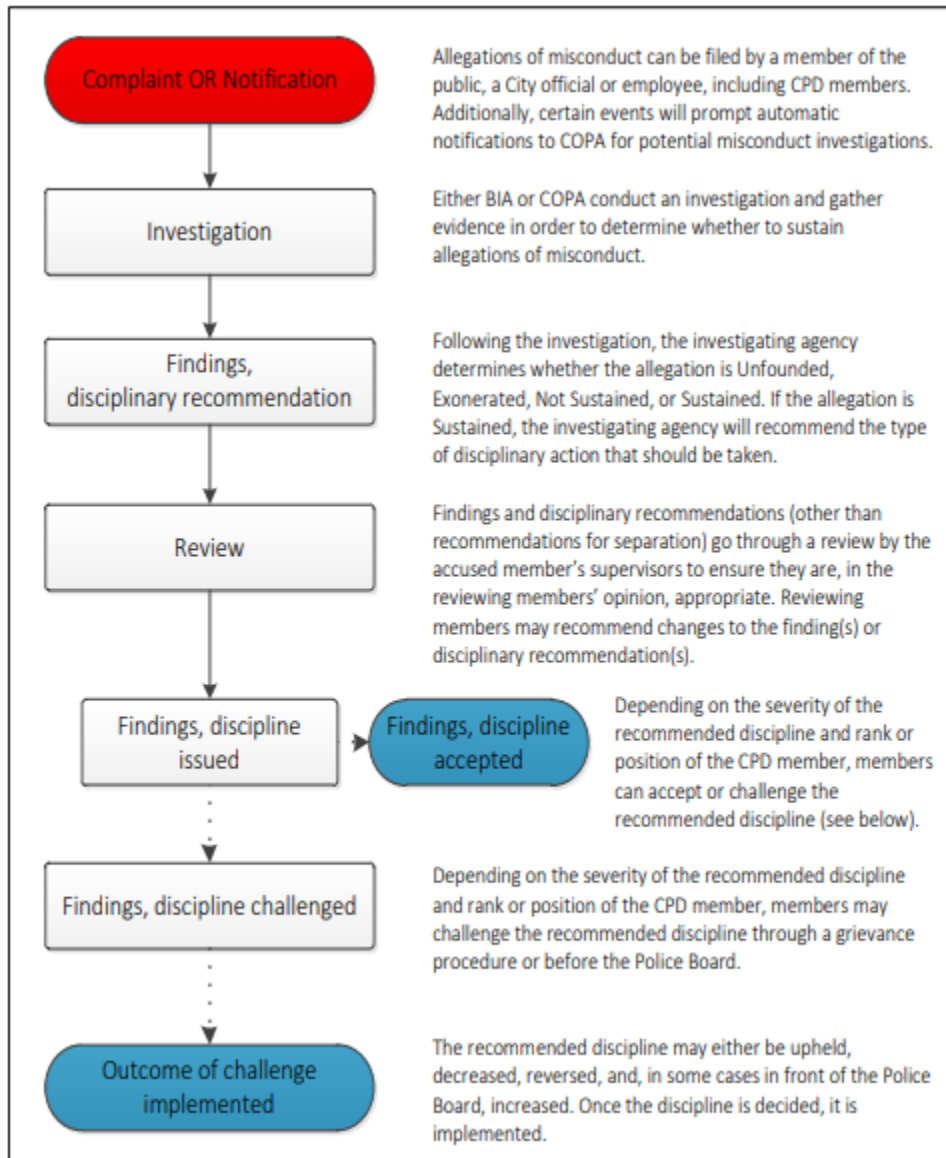
[R]eview and audit individual closed Office and Police Department disciplinary investigations, and to make findings and recommendations based on those findings: (i) to inform and improve future investigations and ensure that they are complete, thorough, objective, and fair; and (ii) if it finds a deficiency that it concludes materially affected the outcome of the investigation, recommend that the investigation be reopened.¹¹

B | Misconduct Investigation Process

Figure 3 below provides a simplified, high-level overview of the typical disciplinary process, from complaint through implementation of discipline.

¹¹ MCC 2-56-230(c).

Figure 3: Overview of Chicago’s disciplinary process



Source: OIG Analysis¹²

At the conclusion of an investigation, the investigating agency weighs the evidence of misconduct and reaches a finding for each allegation (i.e., Sustained, Not Sustained, Unfounded, Exonerated) as shown below in Figure 4.

¹² City of Chicago Office of Inspector General, “Fairness and Consistency in the Disciplinary Process for Chicago Police Department Members.”

Figure 4: Allegation Findings

- **Sustained** – where it is determined the allegation is supported by a preponderance of the evidence;
- **Not Sustained** – where it is determined there is insufficient evidence to prove the allegations by a preponderance of the evidence;
- **Unfounded** – where it is determined by clear and convincing evidence that an allegation is false or not factual; or
- **Exonerated** – where it is determined by clear and convincing evidence that the conduct described in the allegation occurred, but it is lawful and proper.

Source: COPA Policy – Final Summary Report¹³

The investigator then writes a Final Summary Report of Investigation (FSR) and if one or more allegations are sustained, the investigating agency may recommend discipline for the accused CPD member.¹⁴ For sworn members, recommended discipline may include a Violation Noted, Reprimand, Suspension, or Separation. Violations noted and reprimands are least severe and are simply entered into the member's disciplinary history, whereas suspensions require a specified number of unpaid days off, and separations mean discharge from CPD. In most cases, a member can challenge the recommended discipline through different procedures. If an accused member is covered by a collective bargaining agreement (CBA), the provisions of their CBA allow them to challenge certain types of issued discipline by filing a grievance.¹⁵ Most grieved disciplinary cases will be heard by an arbitrator, although there are different rules of procedure for the different types of arbitrations delineated by the various CPD member CBAs.

In certain circumstances, COPA or BIA may administratively close investigations under their jurisdiction, meaning that the investigating agency does not reach a findings determination (e.g., Sustained or Exonerated) for the allegations within the investigation. According to internal COPA policy, such circumstances may include:

- A preliminary investigation did not result in sufficient objective verifiable evidence of misconduct.
- The complaint does not involve a Chicago Police Department member.
- Following a preliminary review/investigation the complaint was referred to an external agency.
- All accused CPD members are currently not employed by the Department or are otherwise unable to provide a required/necessary statement to COPA.

Furthermore, while many investigations result in disciplinary penalties, COPA's ordinance empowers its Chief Administrator to recommend "other remedial action against members of the

¹³ Civilian Office of Police Accountability, "Final Summary Report," July 30, 2021, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/08/COPA-Policy_Final-Summary-Report_FINAL_2021-07-30.pdf.

¹⁴ These reports may also be referred to as Summary of Report Investigation (SRIs) or Administrative Summary Reports (ASRs).

¹⁵ A grievance is a dispute or difference between the employer (CPD) and the union or employees (CPD members) whom the union represents, concerning the interpretation and/or application of the CBA. For more information on CPD members' grievance process, see City of Chicago Office of Inspector General, "Review of the Disciplinary Grievance Procedure for Chicago Police Department Members," May 20, 2021, accessed September 3, 2025, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Review-of-the-Disciplinary-Grievance-Procedure-for-Chicago-Police-Department-Members.pdf>.

Police Department found to be in violation of any applicable Police Department rules.”¹⁶ COPA’s “Disciplinary and Remedial Recommendations” policy states that non-disciplinary interventions may include recommendations for professional counseling, training, behavioral intervention, or fitness for duty evaluations.¹⁷

C | COPA’s Timeliness Initiative Project (TIP)¹⁸

In July 2023, COPA launched its Timeliness Initiative as “a one-time effort aimed at significantly reducing COPA’s overall caseload.”¹⁹ Prior to this, COPA regularly reported having well over 1,000 open cases at any given time, with the majority being open for longer than 18 months.²⁰ The Timeliness Initiative reflected a notable deviation from COPA’s typical misconduct investigation process outlined above. Through this effort, COPA reviewed investigations 18 months or older to determine if the misconduct comprised “low level but viable allegations,” which could be completed as “Non-Disciplinary Closures (NDCs)” with training recommendations rather than formal discipline.²¹ COPA reviewed aging misconduct cases to determine if the investigation had “sufficiently progressed to a point where the scope and nature of any potentially viable allegations could reasonably be determined.”²² This initial investigative review considered whether applicable and relevant direct or circumstantial evidence was obtained and included as part of the investigative file, and to what extent any outstanding evidence may be necessary to proceed in the review process.

As part of this effort, COPA leadership created the “Special Project Process Timeliness Initiative Project – Phase I” document (“TIP Guidance”) which outlined the initiative’s purpose and provided guidance for its internal review staff on how to evaluate cases for potential closure. This document includes sections describing Stakeholder Notice, Internal Preparation (e.g., Internal Investigation Meetings, Investigative Staff Prep Work), Timeliness Initiative Review Process (e.g., Review Criteria, Timeliness Tracking Spreadsheet), Post Closure Activities (e.g., Review Summary Emails, Training Recommendations to CPD, Quality Management, Case Liaisons, and the COPA Website), and Reopening (i.e., reopening closed investigations based on recommendations from external parties).

COPA selected two Supervising Investigators, one Director of Investigations (DOI), and one Deputy Chief Administrator (DCA), known as the “Review Staff,” to evaluate all open investigations that were 18 months or older. As outlined within the TIP Guidance, if the review staff determined an investigation included any of the potentially viable allegations shown below in Figure 5, the investigation would be disqualified for closure through this process during “Phase 1” of the Timeliness Initiative.

¹⁶ MCC 2-78-120(l).

¹⁷ Civilian Office of Police Accountability, “Disciplinary and Remedial Recommendations,” June 24, 2021, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/07/COPA-Policy_Disciplinary-and-Remedial_FINAL_2021-06-24.pdf.

¹⁸ COPA refers to this effort as the “Timeliness Initiative” in statements and the “Timeliness Initiative Project (TIP)” within its documentation. Therefore, OIG uses these terms interchangeably within this inquiry.

¹⁹ Civilian Office of Police Accountability, “Annual Report 2023,” February 15, 2024, 5, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2024/05/2023-Annual-Report_.pdf.

²⁰ See Section D and Figure 7 below for more information on COPA’s caseload and earlier efforts to reduce its backlog.

²¹ Civilian Office of Police Accountability, “Timeliness Initiative,” accessed September 3, 2025. As of January 2026, this webpage is no longer available on COPA’s website.

²² Civilian Office of Police Accountability, “Timeliness Initiative.”

Figure 5: Viable allegations ineligible for closure under the Timeliness Initiative

- a. rule 14 violations or an act of dishonesty;
- b. domestic violence;
- c. sexual misconduct;
- d. unjustified uses of deadly force;
- e. unjustified uses of excessive force resulting in confirmed documented significant injury;
- f. unjustified uses of force on a restrained individual(s);
- g. non-procedural issues related to search warrant procurement or execution;
- h. intentional misconduct;
- i. any allegation that may result in a substantial disciplinary action;
- j. highly objectional instance of verbal abuse (as defined by MCC 2-78-10);
- k. allegations arising from an investigation referred to the Cook County State's Attorney for a potential criminal investigation;
- l. acts of retaliation by CPD members;
- m. allegations arising from an investigation garnering a high-level of public interest;
- n. officer-involved firearm discharges (excluding animal destruction);
- o. fatal motor vehicle pursuits;
- p. case re-opened at the request of external agencies (i.e., PSIG, CPD, DOL, or IMT), and
- q. although not an absolute disqualification, Review Staff will also consider whether potentially viable allegations involved vulnerable individuals, i.e., juveniles, the elderly, and disabled individuals.

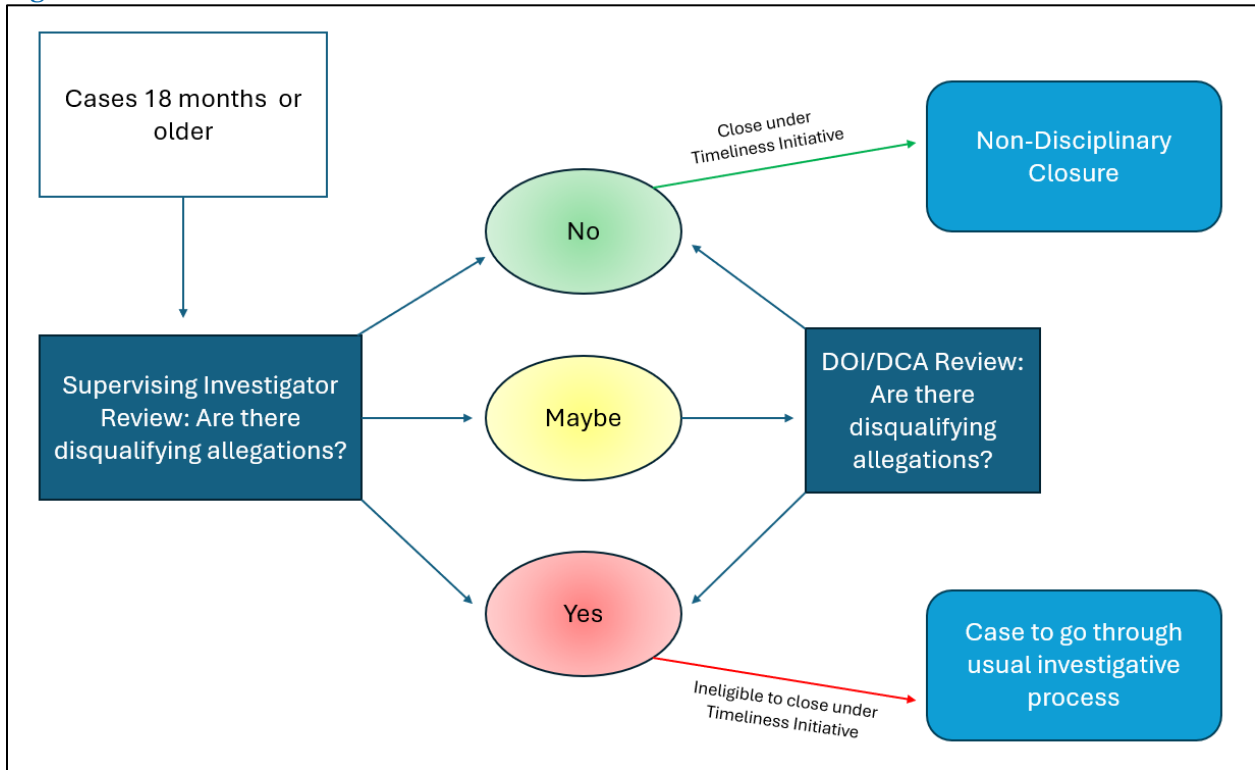
Source: COPA Special Project Process Timeliness Initiative Project – Phase I²³

In an interview with OIG, a Supervising Investigator on the review staff confirmed that COPA used the above “Review Criteria” to determine whether cases were eligible for closure under the Timeliness Initiative. Following the review staff’s assessment, any investigation that did not include one of the enumerated disqualifying allegations would be administratively closed as an NDC.

When evaluating an investigation for closure eligibility under the Timeliness Initiative, the Supervising Investigators made an assessment for each case of “green, yellow, or red” on their review spreadsheets, noting that cases marked green were eligible to close as NDCs but that red cases would be ineligible for closure. The Supervising Investigator reported that investigations marked yellow indicated, “I need another set of eyes on this,” and stated that these cases were reviewed and evaluated by the assigned DOI or DCA. The DOI or DCA then made the final decision on yellow cases after determining their eligibility for closure as an NDC and recategorized the case as either green or red.

²³ COPA’s TIP Guidance incorrectly lists the statute which defines verbal abuse within the Municipal Code. In COPA’s Ordinance, verbal abuse is defined within MCC 2-78-100.

Figure 6: Timeliness Initiative Review Process



Source: COPA Special Project Process Timeliness Initiative Project – Phase I

For investigations closed under this initiative, COPA’s website states that the review staff provided a “consistent standardized review of allegations of misconduct...that may result in training or other remedial recommendations.”²⁴ Per the TIP Guidance, the review staff recommended training for CPD members if during their review they found there was “a strong likelihood that a specific allegation(s) may have resulted in a Sustained finding.” Within CMS, the review staff then uploaded a “Non-Disciplinary Closure Memo” outlining the overall impetus, process, and criteria for the Timeliness Initiative and updated the investigation to reflect a status of “Closed/No Finding.”

In December 2023, City Council ratified an amended CBA with the Fraternal Order of Police (FOP), the police union that represents sworn CPD members below the rank of Sergeant. Per the amended CBA, investigating agencies are required to complete misconduct investigations within 18 months and investigations exceeding this time limit are subject to hearings to determine whether there was “reasonable cause” for delay. Following ratification of the amended CBA, COPA was given a 45 day “ramp up” period to conclude cases before “triggering the process under which ‘reasonable cause’ hearings may be requested.” COPA leadership determined that “expansion of the eligible cases for closure under the existing Non-Disciplinary Closure Memorandum [the Timeliness Initiative] was also needed to ensure the fewest number of cases over 18 months old were left open beyond January 27, 2024 [the end of the 45-day period].” Thereafter COPA issued its “COPA Timeliness Closure Review Phase 2: FOP Contract/Time Limits” document and launched “Phase 2” of the Timeliness Initiative in which only aging investigations “1) with anticipated disciplinary recommendations of 180 days to separation; or 2) with related pending criminal

²⁴ Civilian Office of Police Accountability, “Timeliness Initiative.”

litigation against the accused officer and/or referral to a local prosecutor’s office” were deemed ineligible to complete as an NDC.

D | Factors Contributing to COPA’s Rationale for Launching the Timeliness Initiative

As outlined above, the Timeliness Initiative closures represent a departure from the standard disciplinary investigation process at COPA. Within this section, OIG outlines the driving forces COPA identified as to why the initiative was needed to ensure sustainable future investigative success.

Arbitration Awards

The CBAs for sworn members include a “just cause standard” stating that members cannot “be suspended, relieved from duty, or disciplined in any manner without just cause.”²⁵ As noted in Section B, most grieved disciplinary cases will be heard by an arbitrator.²⁶ Arbitrators serve as the adjudicators in both Binding Summary Opinions (BSOs) and Arbitrations. BSOs are evidentiary hearings in which an arbitrator performs a paper review of the investigative file prior to the BSO hearing date. Arbitrations are formal evidentiary proceedings involving oral arguments and witness testimony in front of an arbitrator. Arbitrators are not City employees and instead are selected to hear a particular case by mutual agreement of the parties. After reviewing the merits of the grievance, arbitrators provide a written, binding decision.

According to COPA’s Non-Disciplinary Closure Memo included in closed Timeliness Initiative case files, “Through the participation of COPA’s leadership – as witnesses – in traditional arbitration hearings, as well as a review of the arbitration opinions (known as “awards”) resulting from both the BSO and traditional arbitration process, it is evident that arbitrators weigh timeliness of an investigation much more than any other evidentiary component. This is reflected through the [grievance] awards, in which discipline is often rescinded or reduced to a reprimand.” COPA provided the following examples to OIG of grievances involving CPD members represented by the FOP, in which the timeliness of the investigation impacted the arbitrator’s decision:

- A CPD member grieved a 5-day suspension for a case in which the Department determined they were rude and unprofessional while responding to a mental health call. The arbitrator found “The significance of questioning discipline for an event that occurred almost two years previously is that under a just cause standard the discipline must be prompt, reasonable and corrective... there is a limit to the time it takes to engage in corrective discipline without any valid explanation for the reason for any delay.”
- In another case in which a CPD member grieved a written reprimand for a body worn camera (BWC) activation violation, the arbitrator found that “COPA’s Summary Report of

²⁵ City of Chicago, “Agreement Between the City of Chicago Department of Police and the Fraternal Order of Police Chicago Lodge No. 7,” Section 8.1, accessed September 3, 2025, https://directives.chicagopolice.org/contracts/FOP_Contract.pdf.

City of Chicago, “Agreements Between the City of Chicago and the Policemen’s Benevolent & Protective Association of Illinois, Unit 156-Sergeants,” accessed January 26, 2026, October 15, 2021, https://directives.chicagopolice.org/contracts/PBPA_SgtContract.pdf.

²⁶ For certain types of discipline, the appeal may be heard by the Police Board instead of an arbitrator.

Investigation was issued...twenty-three months after the incident occurred. The Department later notified the Grievant of the reprimand...roughly twenty months after the COPA report [was] issued – i.e. a total of 43 months from the date of the incident.” The arbitrator wrote that “Entirely too much time had passed from the occurrence for the written reprimand to accomplish anything other than to engender disaffection... The arbitrator finds the undue delay in investigating and disciplining the Grievant have undercut the value and potential positive impact of any written reprimand.”

- A CPD member grieved a 5-day suspension given for performing a protective pat down on an individual of the opposite sex, even though an officer of the same sex was immediately available.²⁷ In this case, COPA did not interview the member until two years after the incident occurred. While the arbitrator found that “the Grievant was not unduly harmed in defending [themselves] by the delay... Waiting three years after an incident of misconduct to give someone a five-day suspension undercuts the effectiveness of the discipline and tends to cause disaffection in the employee and those other employees who become aware of the inequity.”

According to COPA’s former Chief Administrator, “What we learned in talking to the Department of Law, and also to CPD, is that we have an exceedingly low rate for our recommendations being held up or accepted at arbitration on those low-level cases.”²⁸ COPA further stated that “in reviewing disciplinary outcomes grieved by CPD members, the length of an investigation was a key factor in determining final disciplinary outcomes, with many being reduced or stricken completely.” In a January 2024 Police Board Meeting, COPA’s then-Chief Administrator stated that “old cases don’t have the chance of success in arbitration. So, utilizing COPA’s limited resources to continu[e] laboring over and investigating old cases that don’t have any ability to be successful isn’t a good use [or] good stewardship of the resources that we have, and the obligation that we have under our own municipal code, and that we owe to officers and residents who complain about police interactions.”²⁹ Within its Non-Disciplinary Closure Memo, COPA stated that, “If investigators continue to devote resources to their caseload in a chronological order, they will consistently and detrimentally affect their new investigations by delaying their close dates. This will result in diminished, if any, ability to achieve the implementation of COPA’s disciplinary recommendations.”

COPA’s Management of Its Case Backlog

Although COPA leadership “set out to create a new agency from the ground up with a new staff and new rules for how investigations are conducted,” at the time of its launch, COPA “inherited nearly 1,000 cases from IPRA.”³⁰ According to its website, COPA “has devoted significant

²⁷ At the time of this incident, CPD policy stated that “Protective Pat Downs will be conducted by a member who is the same gender as the person that is the subject of the Investigatory Stop,” unless there are no members of the same gender immediately available and safety is compromised. Chicago Police Department, “Special Order S04-13-09: Investigatory Stop System,” effective July 10, 2017 through February 3, 2026.

²⁸ Chicago Police Board, “Public Meeting,” May 18, 2023, 36, accessed September 3, 2025, <https://www.chicago.gov/content/dam/city/depts/cpb/PubMtgMinutes/PubMtgTranscript05182023.pdf>.

²⁹ Chicago Police Board, “Public Meeting,” January 18, 2024, 23, accessed September 3, 2025, <https://www.chicago.gov/content/dam/city/depts/cpb/PubMtgMinutes/PubMtgTranscript01182024.pdf>.

³⁰ Civilian Office of Police Accountability, “FAQS,” accessed September 3, 2025, <https://www.chicagocopa.org/faqs/>. Heather Cherone, “New Limits on CPD Misconduct Probes Expose Deep Tension Between Top Cop, Misconduct Agency,” *WTTW Chicago*, March 22, 2024, accessed September 3, 2025, <https://news.wttw.com/2024/03/22/new-limits-cpd-misconduct-probes-expose-deep-tension-between-top-cop-misconduct-agency>.

resources to working through a backload of investigations it inherited [from IPRA]. While the agency worked to conclude many of these investigations, it was also actively receiving new allegations of misconduct. As a result, COPA's caseload grew significantly, impacting its ability to close investigations in a timely manner."³¹

COPA has previously undertaken administrative efforts to reduce the backlog of investigations leftover from IPRA. For example, OIG released an advisory in 2020 regarding concerns as to COPA's use of "Administrative Termination" to close many disciplinary investigations short of an investigative finding. At that time, COPA reported to OIG that Administrative Termination was used "in the service of COPA's ongoing internal operational goal of clearing its inherited backlog of IPRA's legacy cases."³² Based on its review, OIG recommended that COPA refrain from administratively terminating investigations based solely on the age of the complaint or to increase case closure capacity. In its response to OIG and mirroring its current rationale for the Timeliness Initiative, COPA stated that "Administrative Termination is appropriate for cases that may have indicia of misconduct, but are unlikely to produce an affirmative finding, such that pursuit of the matter would misapply finite resources and manpower"(emphasis in original).

In a separate effort, a Supervising Investigator told OIG that in September 2019 they were responsible for clearing out between 600 to 800 cases which were stuck at the Intake stage of COPA's investigative process. The Supervising Investigator stated they were in charge of reviewing these cases to determine if the cases should be sent back to Intake for additional preliminary investigative work, if the allegations were serious enough to send to COPA's general investigations section, or if the cases could be administratively closed because there was no sworn affidavit (at the time a sworn affidavit or affidavit override was required for misconduct investigations to proceed).³³

A Supervising Investigator described these previous COPA efforts as "playing whack-a-mole" with case backlogs. Despite these initiatives aimed at reducing open cases, COPA reported that its "caseload peaked at approximately 2,000 open investigations" in 2020. A COPA Supervising Investigator told OIG that the COVID-19 pandemic and "great resignation" of 2021 also contributed to turnover and backlogs in investigations as supervisors had to figure out how to reassign each departing investigator's caseload among the remaining team.

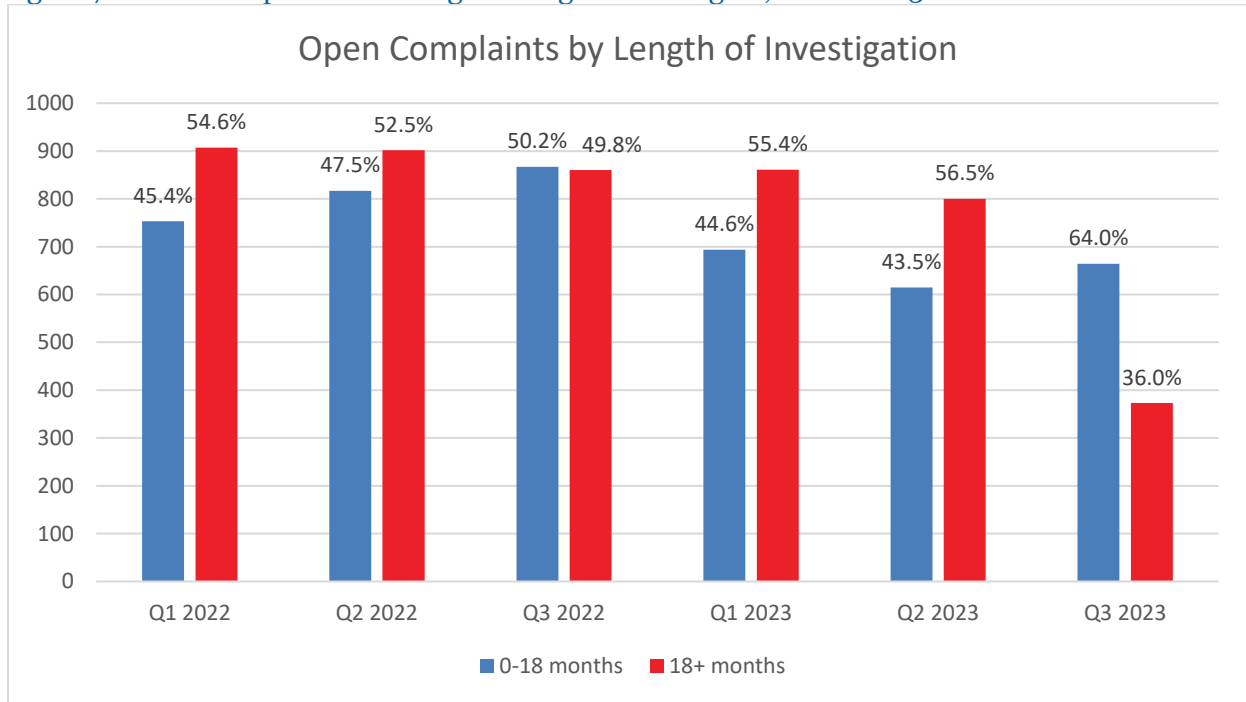
According to COPA's Quarterly Reports, most pending investigations in 2022 and early 2023 were open longer than 18 months.

³¹ Civilian Office of Police Accountability, "Timeliness FAQs," accessed September 3, 2025. As of January 2026, this webpage is no longer available on COPA's website.

³² City of Chicago Office of Inspector General, "OIG Advisory Concerning COPA's Practice of Administratively Terminating Disciplinary Investigations," September 2020, 9, accessed September 3, 2025, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Advisory-Concerning-COPAs-Practice-of-Administratively-Terminating-Disciplinary-Investigations.pdf>.

³³ An affidavit override provides an investigating agency the authorization to complete a misconduct investigation without obtaining a sworn affidavit from the complainant on the basis of there being objective, verifiable evidence to support the allegations.

Figure 7: COPA’s Reported Pending Investigations Lengths, 2022-2023³⁴



Source: COPA Quarterly Reports³⁵

By COPA’s own admission, many of these cases had long investigative timelines due to internal delays. While reviewing cases for closure under the Timeliness Initiative, COPA Supervising Investigators documented patterns they found within these aging investigations “related to file maintenance, the investigative process, and other areas of concern” in a “Case Review Trends Memo.” The excerpts provided below are from the Supervising Investigators’ case review and highlight COPA leadership’s own assessment of potential pitfalls within its investigative process:

- **Delays in Investigating Cases Assigned to General Investigations** – Another pattern we noticed was that cases were assigned to General Investigations but not immediately assigned and/or investigated. There were instances when a case was assigned to a team and a supervisor, but the supervisor did not assign the case to a team member.
- **Missed Time Sensitive Evidence or Referrals** – This lack of follow-up resulted in missed opportunities to obtain time sensitive evidence and/or determine whether COPA lacked jurisdiction and the case should be transferred to BIA.
- **Case Transfers** – In the past, when an investigator resigned from COPA, there was no policy in place to address the reassignment of their cases. This coincided with the pandemic when there was also high staff turnover. While serious cases were usually immediately reassigned, less serious cases were left unassigned for extended periods of time. We also observed that cases transferred between investigators were the most likely to be put on the proverbial back burner. This contributed to COPA’s investigative backlog and lengthy delays in case closures.

³⁴ Q4 numbers are not included in this chart as COPA does not publish Q4 numbers in any of its quarterly or annual reports.

³⁵ Civilian Office of Police Accountability, “Quarterly Reports,” accessed September 3, 2025, <https://www.chicagocopa.org/news-publications/publications/quarterly-reports/>.

- **Investigator Specific Delays** – Upon a complete review of all open investigations assigned to an investigator in general investigations, it became apparent that a small section of Investigative staff would avoid completing particular steps in the investigative process, i.e., the investigator with [sic] have a disproportionately high number of open investigations without accused officer interviews completes [sic], suggestive of avoidance of this particular task, or may have a high number of investigations requiring FSR drafting.
- **Completed investigations without FSRs** – We found many instances where the investigation was complete (i.e. evidence gathered and officers interviewed), but the FSR was never drafted. In certain cases, investigations languished for well more than 12 months without a report.
- **Inconsistent Supervisory Overview of Investigations** – Many of the above-mentioned issues stemmed from inconsistent supervision and lack of consistent case review meetings between Supervising Investigators and their staff.
- **Final Review Delays** – We also found many instances of cases that were otherwise complete and had drafts submitted but were stuck in one of the many stages of final review. We found extended delays at the Supervising Investigator, Legal, and Deputy Chief level.

Fraternal Order of Police Collective Bargaining Agreement

According to the July 2023 TIP Guidance, COPA “expect[ed] an express timeframe to be incorporated into [the] future FOP CBA.” Therefore, one of the goals of the Timeliness Initiative was to “position COPA’s pending caseload more in line with Collective Bargaining Agreement (‘CBA’) prescribed timeframes.” As noted, in December 2023, City Council ratified the CBA between the City and the FOP, which set the time limit for most misconduct investigations at 18 months. This change to the FOP contract mirrored the existing 18-month investigative time limit that applies to sworn CPD members belonging to the Policemen’s Benevolent and Protective Association (PBPA), covering Sergeants, Lieutenants, and Captains. This alignment of investigative timelines was particularly impactful to COPA’s caseload as the FOP contract applies to many more CPD members.³⁶ In December 2023, PBPA membership was roughly 1,500 members, meaning the 18-month time limit previously only applied to investigations involving this subset of CPD members.³⁷ However, the investigative deadline now applies to any investigation involving members of both the PBPA and the FOP – which together encompassed over 11,600 CPD members in February 2024.³⁸

E | OIG Descriptive Analysis of Timeliness Initiative Data

Across multiple forums, COPA has publicly stated and published different final counts of Non-Disciplinary Closures under its Timeliness Initiative. As such, the data reported here illustrates OIG’s own analysis based on data collection completed by its Investigative Analysis Unit during its review of closed misconduct investigations. As part of this evaluation, OIG reviewed all investigations COPA completed as Non-Disciplinary Closures. Overall, OIG found that COPA

³⁶ OIG did not seek to determine the exact number of open COPA investigations that were impacted by this change as the data provided on COPA’s website does not include the accused member’s rank.

³⁷ Per OIG dashboards, on December 1, 2023, 1,579 members were designated as Sergeants, Lieutenants, or Captains. However, OIG did not verify that all such members belong to their respective PBPA union.

³⁸ Per OIG dashboards, on February 1, 2024, there were 11,668 members, not including those assigned as Chief, Commander, Deputy Chief, or Superintendent. These numbers reflect members eligible to be covered under the FOP and PBPA unions; OIG did not confirm actual union membership numbers.

closed 654 individual investigations under the Timeliness Initiative.³⁹ CPD members may be accused in multiple cases or individual investigations may involve multiple accused CPD members. Additionally, cases can involve multiple misconduct allegations. OIG found cases closed under the Timeliness Initiative involved a total of 1,542 instances of alleged misconduct and involved 1,041 known individual CPD members. This count of known individual CPD members excludes instances where COPA determined there were “no accused members” (N=3) or the accused was listed as “unknown” (N=38).



OIG found most allegations closed under the Timeliness Initiative involved accused CPD members who were Police Officers.

Figure 8: Known Accused Member Rank

Rank	Known Individual Accused Members
Police Officer	938
Sergeant	87
Lieutenant	11
Civilian/Administrative	4
Senior Leadership	1

Source: OIG analysis

During an investigation, investigators select a Primary Category Code within CMS to describe the alleged misconduct. Based on this Primary Category Code, almost 90% of cases closed under the Timeliness Initiative involved allegations of a Civil Rights Violation (e.g., illegal search and seizure), or Excessive Force. The average length of investigation for all cases closed under the Timeliness Initiative was approximately 1,020 days or 2.79 years.

Figure 9: Allegation Categories

Primary Category Code	Total Allegations	Percentage of Allegations
Civil Rights Violation	985	63.9%
Excessive Force	399	25.9%
Operation/Personnel Violations	95	6.2%
Verbal Abuse	27	1.8%
Arrest/Lockup Incidents	9	0.6%
Weapon Discharge	7	0.5%
Supervisory Responsibilities	6	0.4%

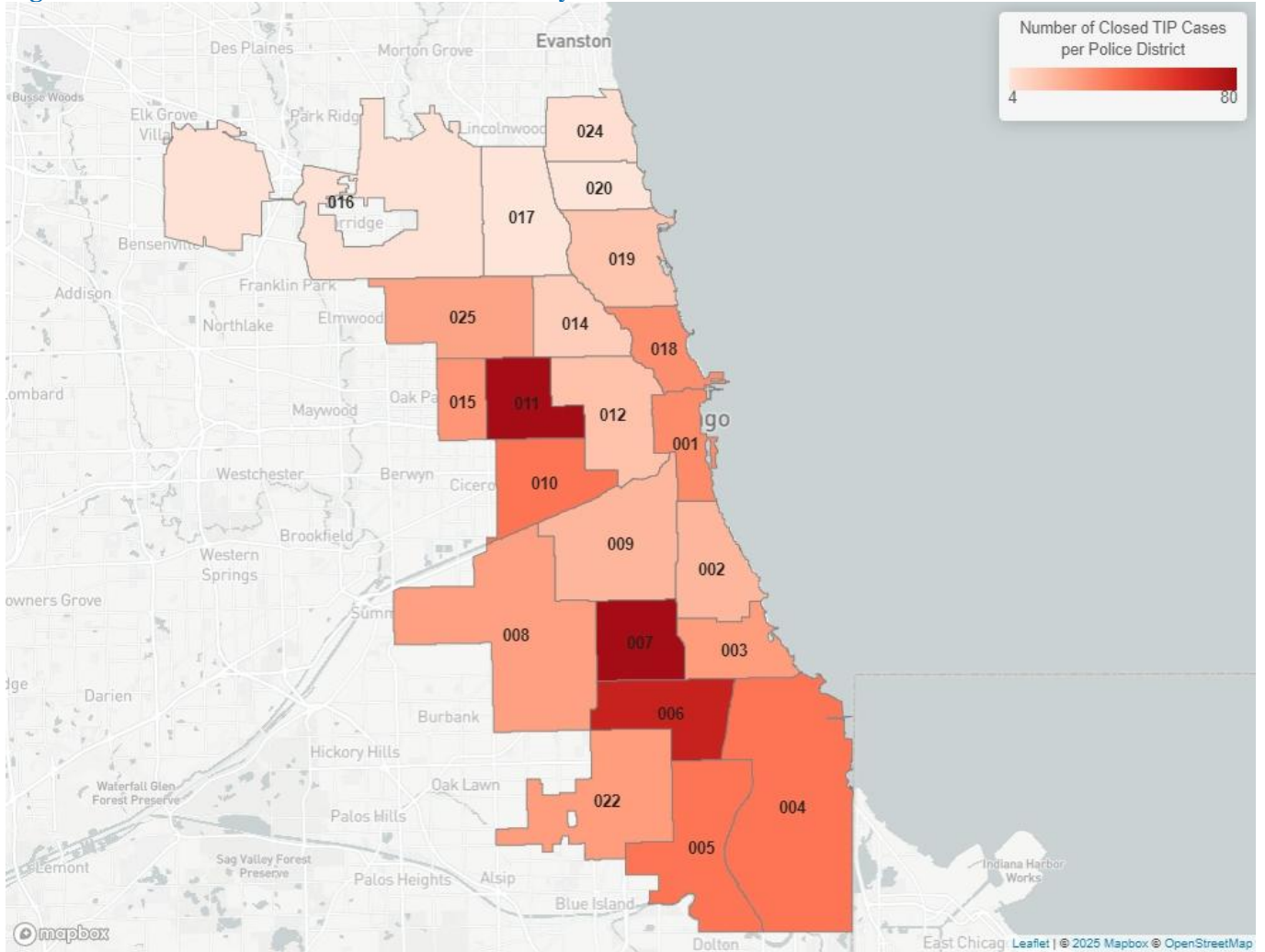
³⁹ OIG found investigations where allegations against some members were completed as Non-Disciplinary Closures under the Timeliness Initiative while allegations for other members were brought to findings. Throughout this review, OIG uses 654 investigations to refer to the total number of cases with any allegations closed under COPA’s Timeliness Initiative.

Domestic Incidents	5	0.3%
Traffic	5	0.3%
Alcohol/Drug Abuse Intoxicated	2	0.1 %
Conduct Unbecoming	2	0.1%

Source: OIG analysis

In its analysis, OIG found that District 007 - Englewood and District 011 - Harrison each had 80 investigations closed under the Timeliness Initiative.

Figure 10: Closed Timeliness Initiative Cases by Police District of Occurrence



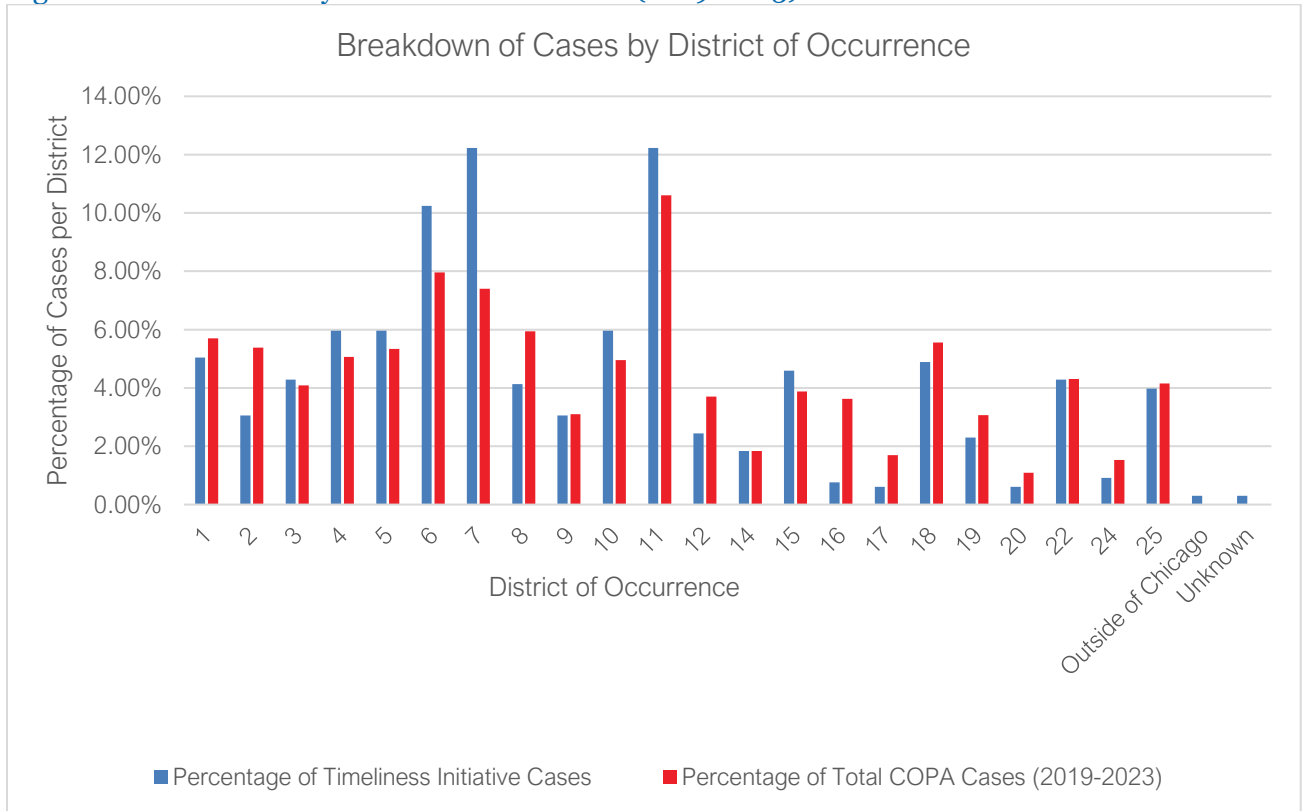
District of Occurrence	Number of Cases Closed Under the Timeliness Initiative
1st - Central	33
2nd - Wentworth	20
3rd - Grand Crossing	28

4th - South Chicago	39
5th - Calumet	39
6th - Gresham	67
7th - Englewood	80
8th - Chicago Lawn	27
9th - Deering	20
10th - Ogden	39
11th - Harrison	80
12th - Near West	16
14th - Shakespeare	12
15th - Austin	30
16th - Jefferson Park	5
17th - Albany Park	4
18th - Near North	32
19th - Town Hall	15
20th - Lincoln	4
22nd - Morgan Park	28
24th - Rogers Park	6
25th - Grand Central	26
Outside of Chicago	2
Unknown	2

Source: OIG analysis

OIG conducted further analysis to determine if these trends regarding the District of occurrence for cases closed under the Timeliness Initiative matched the District of occurrence trends for all COPA cases within this timeframe. As shown in Figure 11, OIG found that Districts 007 and 011, which had the most Timeliness Initiative closures, were also among the CPD Districts with the most overall COPA cases.

Figure 11: COPA Cases by District of Occurrence (2019-2023)

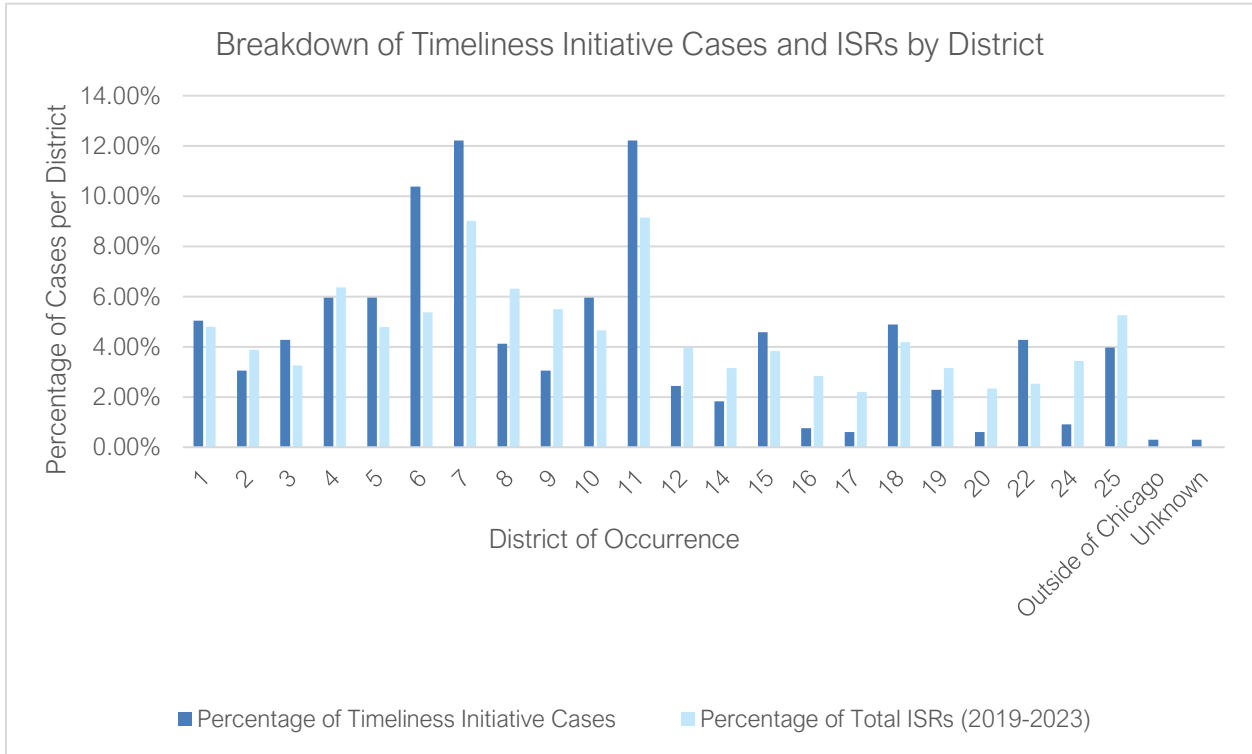


Source: OIG analysis

These District trends may also be reflective of the categories of alleged misconduct closed under the Timeliness Initiative. For example, after conducting an investigatory stop, CPD members are required to complete an Investigatory Stop Report (ISR).⁴⁰ In its analysis, OIG found that the two Districts (007 and 011) with the most investigations closed under the Timeliness Initiative also issued the most ISRs during this timeframe. A COPA Supervising Investigator told OIG that many of the aging cases closed under the Timeliness Initiative alleged Fourth Amendment violations for improper searches conducted during traffic stops and these investigations had historically been “put on the backburner” by COPA because they are difficult to sustain. These aging investigations were therefore prime candidates for Non-Disciplinary Closures under the Timeliness Initiative.

⁴⁰ From July 2017 until February 2026, an investigatory stop was defined by CPD as “a temporary detention and questioning of a person...based on Reasonable Articulate Suspicion that the person is committing, is about to commit, or has committed a criminal offense.” Investigatory stops can lead to a search of a vehicle or a pat down of an individual if an officer has reasonable suspicion. After they have conducted an investigatory stop, CPD members were required to complete an Investigatory Stop Report. Chicago Police Department, “Special Order S04-13-09: Investigatory Stop System,” effective July 10, 2017 through February 3, 2026.

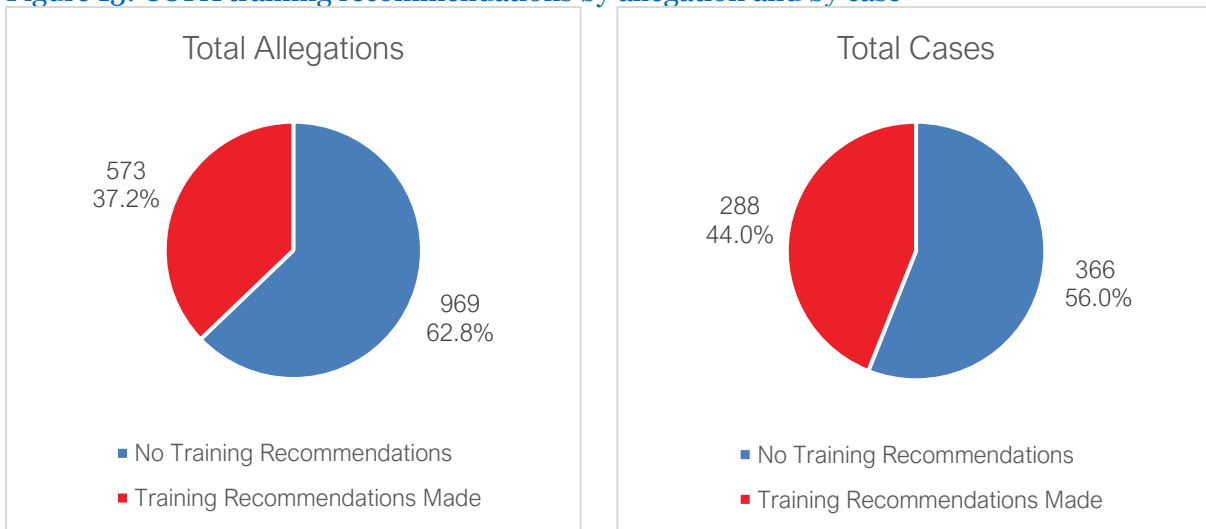
Figure 12: Timeliness Initiative Cases and Investigatory Stop Reports (2019-2023) by District of Occurrence



Source: OIG analysis

OIG found that the cases closed under the Timeliness Initiative involved 1,542 individual allegations against CPD members. COPA recommended retraining for CPD members related to 573 (37.2%) of these allegations. These allegations were spread across 654 individual investigations closed under the Timeliness Initiative. Of these 654 investigations, COPA recommended training for a CPD member in 288 cases (44.0%).

Figure 13: COPA training recommendations by allegation and by case



Source: OIG analysis

CPD members may have received multiple training recommendations per investigation or training recommendations across multiple investigations. Within the 288 cases in which COPA recommended training, OIG found the review staff made a total of 742 individual training recommendations. COPA most frequently recommended training related to BWCs and form reporting requirements, such as Tactical Response Reports (TRR) and ISRs.

Figure 14: Types of Training Recommended

Training Type	Total Recommendations
BWC Policy	310
Form Reporting (ISR/TRR)	236
Use of Force (Taser/Firearm Pointing/Baton)	41
Vehicle Searches	39
De-escalation	37
Other ⁴¹	28
Professionalism	28
Fourth Amendment Violations	14
Supervisory Responsibilities	9

Source: OIG analysis

⁴¹ Examples of “Other” recommendations include training regarding lockup incidents, failure to intervene, failure to report officer misconduct, and failure to secure arrestee’s property.

III | Objectives, Scope, and Methodology

A | Objectives

The objectives of this inquiry were to describe the universe of investigations COPA completed as Non-Disciplinary Closures (NDCs) under the Timeliness Initiative, and to determine whether COPA implemented its Timeliness Initiative in accordance with its public statements and Special Project Process guidelines.

B | Scope

Within this inquiry, OIG focused on COPA's implementation of its Timeliness Initiative and also noted where the appropriateness of this case management strategy appeared to conflict with COPA's stated purpose. The scope of this inquiry encompassed a review of all investigations completed by COPA as NDCs from July 2023 through January 2024. However, although OIG reviewed all cases, its review was limited by COPA's incomplete and inaccessible investigative files.⁴² Finally, due to staffing changes at COPA, OIG was unable to interview one of the two Supervising Investigators involved in the Timeliness Initiative review process.⁴³

C | Methodology

To describe the universe of investigations completed as NDCs under the Timeliness Initiative, OIG:

- reviewed all closed misconduct cases completed as NDCs by COPA from July 2023 to January 2024; and
- documented and calculated descriptive measures about the cases closed under this initiative including: CPD member(s) and rank(s), District of occurrence, allegations primary category code, and training recommendations for each member and investigation.

To determine whether COPA implemented the Timeliness Initiative in accordance with its own public statements and official guidelines, OIG evaluated each distinct component of COPA's "Special Project Process – Timeliness Initiative Project – Phase I" document.

- To evaluate whether and how COPA engaged with stakeholders prior to launching the Timeliness Initiative, OIG reviewed:
 - video recordings and transcripts including,
 - Community Commission for Public Safety and Accountability meetings,
 - Police Board meetings,
 - media interviews;
 - sample letters, emails, call agendas, and calendar invitations provided by COPA; and
 - Independent Monitor Reports and COPA's 2023 CCPSA Performance Review.
- To assess whether COPA ensured all relevant evidence was uploaded into the Case Management System (CMS), OIG compared evidence cited by investigators in the CMS notes to evidence found within the Final Folder.

⁴² See Finding 1.A.2. OIG did not undertake a full audit of COPA's investigative file quality to determine the completeness of all case files for log number investigations closed during this initiative.

⁴³ COPA's then-Deputy Chief Administrator, assigned to the Timeliness Initiative review team, participated in OIG's entrance conference interview. However, due to staffing changes, this Deputy Chief Administrator was unavailable for any additional interviews.

- To evaluate whether COPA adhered to its “Review Criteria” guidelines and appropriately identified investigations with viable allegations of the enumerated misconduct as ineligible for closure, OIG:
 - documented deviations from the guidelines by noting any allegations outlined in the “Review Criteria” as ineligible misconduct;
 - analyzed available evidence and training recommendations to determine whether objective, verifiable evidence supported the viability of the allegations.
- To determine whether COPA proactively reached out to complainants, completed its promised website updates, and provided training recommendations to CPD, OIG:
 - interviewed a COPA Case Liaison about their Timeliness Initiative outreach;
 - reviewed Case Liaison notes within COPA’s Timeliness Tracking Spreadsheet and examples provided by COPA;
 - reviewed COPA’s Timeliness Initiative webpage and published special report;
 - interviewed the Sergeant in CPD’s Training and Support Group who is charge of implementing COPA training recommendations; and
 - interviewed the then-Captain of BIA, then-Deputy Director of BIA, and the former Deputy Chief of BIA to understand their knowledge of and involvement in COPA’s Timeliness Initiative and its subsequent training recommendations.

To describe the investigations completed as NDCs under Phase 2 of the Timeliness Initiative, OIG:

- analyzed COPA’s 45-Day Closure Initiative Spreadsheet;
- reviewed all NDCs between December 14, 2023, and January 27, 2024; and
- analyzed emails provided by COPA documenting reasons these investigations were not closed under Phase 1.

In addition to the above, to inform all objectives, OIG:

- reviewed COPA’s internal guidance, memos, reports, and PowerPoints related to the Timeliness Initiative process and outcomes; and
- interviewed COPA’s then-General Counsel, then-Deputy Chief Administrator, Director of Investigations and the Supervising Investigator involved in the Timeliness Initiative.

D | Standards

OIG conducted this review in accordance with the Quality Standards for Inspections, Evaluations, and Reviews by Offices of Inspector General found in the Association of Inspectors General’s *Principles and Standards for Offices of Inspector General* (the “Green Book”).

E | Authority and Role

The authority to perform this inquiry is established in MCC §§ 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations, and, specifically, to review the operations of CPD and Chicago’s police accountability agencies. The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

IV | Findings

Finding 1: COPA did not implement the Timeliness Initiative in accordance with its own guidelines or mission; however, COPA did reduce its investigative caseload under the initiative.

COPA's mission calls for the agency to "determine whether allegations of police misconduct are well-founded" and "provide a just and efficient means to fairly and timely conduct investigations within [its] jurisdiction."⁴⁴ Further, COPA's stated vision is "to be the leader in police accountability by conducting thorough investigations, to advance the culture of police and build trust in civilian oversight."⁴⁵

In July 2023, faced with looming collective bargaining agreement deadlines and heavy caseloads, COPA took action to alleviate its investigative backlog through its Timeliness Initiative. While OIG does not take a position on this method of case management, it offers here an assessment of COPA's chosen implementation strategy. OIG found that COPA stood up this initiative with certain guidelines and promises related to the process and parameters it would abide by, but in practice these criteria were not fully met.

A | COPA did not fully adhere to its Timeliness Initiative process as outlined within its policies and publicly promised by its leadership

OIG analyzed the distinct components outlined in COPA's "Special Project Process – Timeliness Initiative Project – Phase I" document ("TIP Guidance") to determine the agency's adherence to its stated process for completing investigations as Non-Disciplinary Closures (NDCs). The TIP Guidance informed COPA staff on how to facilitate the Timeliness Initiative. In public meetings and within its guiding documentation, COPA outlined specific steps it would take related to "Stakeholder Notice," "Internal Preparation," "TIP Review Process," "Post Closure Activities," and "Reopening."

1 | Stakeholder Notice

According to the TIP Guidance, prior to the start of the Timeliness Initiative, "various members of COPA staff spoke with the Community Commission for Public Safety and Accountability (CCPSA); Independent Monitoring Team (IMT); City of Chicago's Public Safety Inspector General (PSIG);

⁴⁴ MCC 2-78-110. Civilian Office of Police Accountability, "Vision & Mission," accessed September 3, 2025, <https://www.chicagocopa.org/about-copa/mission-history/>.

⁴⁵ Civilian Office of Police Accountability, "Vision & Mission."

Office of the Attorney General (OAG); City Council's Public Safety Committee; City of Chicago's Department of Law (DOL) Labor Division; Police Board; Office of the Mayor; CPD; COPA's Advisory Council; Community and Faith-based Organizations with a pre-existing relationship with COPA; and Plaintiff's Bar Association." The TIP Guidance further states this community outreach was intended to provide "diversity of thought and valuable comments on COPA's TIP process, resulting in the ability for COPA to consider external viewpoints and suggestions," and to serve "as an act of transparency concerning COPA's intentions concerning the TIP, and the reasoning and process behind the TIP."

COPA only partially implemented its plans for stakeholder engagement.

OIG found that several listed stakeholders were informed of COPA's intention to implement the Timeliness Initiative. In an interview with OIG, COPA's then-General Counsel described the feedback COPA received about the Timeliness Initiative from external parties as overwhelmingly positive and stated that the IMT, OAG, and CCPSA all "lauded" COPA for its decision to implement the initiative. This positive feedback was shown during a June 2023 CCPSA meeting in which a CCPSA member spoke in favor of the Timeliness Initiative stating, "We support this decision wholeheartedly and believe it is a reasonable and practical next step."⁴⁶

COPA also provided OIG with agendas from monthly calls with the IMT and OAG that included "Timeliness/backlog reduction plan" as a topic of conversation across many meetings. Notes provided by COPA of its June 8, 2023, meeting with the IMT and OAG state that COPA advised "cases involving improper paperwork (no ISR), BWC, low level search and seizure violations, etc., will be closed" under the initiative. The IMT is charged with assessing compliance with the consent decree, and it prepares reports detailing the City's efforts on a semi-annual basis. The IMT's conversations with COPA are reflected within its Ninth Semi-Annual Independent Monitoring Report (IMR-9), which includes references to the Timeliness Initiative and confirms that COPA and the IMT engaged in conversations about this project.⁴⁷

Separately, COPA leadership reported to OIG that there was "not much resistance" from CPD when they presented the Department with their plan to utilize non-disciplinary recommendations to facilitate case closures. COPA also provided OIG with additional calendar invitations referencing Timeliness Initiative conversations it held with CPD's Bureau of Internal Affairs (BIA), the Cook County State's Attorney's Office, and DOL. COPA additionally cited Police Board and CCPSA public meetings as well as an interview done by COPA's then-Chief Administrator on WTTW Chicago as being part of its Timeliness Initiative community engagement efforts. (See Finding 1 Subsection C for more information on how COPA described the cases to be closed under the Timeliness Initiative during these engagements.)

However, OIG also found that not all community stakeholder engagements listed within the TIP Guidance were conducted. For instance, although COPA listed its Community Advisory Council as one of the engaged stakeholders, the application process for filling this advisory council did not open until June 1, 2023, and the first meeting of the Council was "tentatively scheduled" for

⁴⁶ Community Commission for Public Safety and Accountability, "Public Meeting," June 29, 2023, 1:20:42, accessed September 3, 2025, <https://www.youtube.com/watch?v=9DZDwpyNC8I>.

⁴⁷ Independent Monitoring Report, "Appendix 9: Accountability and Transparency Compliance Assessments," May 23, 2024, accessed August 13, 2025, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR9-Appendix-9-Accountability-and-Transparency.pdf>. Neither IMR-10 nor IMR-11 include any reference to COPA's Timeliness Initiative.

January 2024. Therefore, this Community Advisory Council was not available to serve as an engaged stakeholder for the Timeliness Initiative, which began on July 17, 2023, and ended in January 2024.

Further, the “City of Chicago Office of Inspector General’s Public Safety Inspector General (PSIG)” is listed as a stakeholder in COPA’s TIP memo. While PSIG management attended public meetings in which COPA spoke about the Timeliness Initiative, COPA leadership did not formally introduce the Timeliness Initiative to PSIG. Instead, PSIG first became aware of the official Timeliness Initiative process after reviewing a case in August 2023 with a “Non-Disciplinary Closure Memorandum” included in the investigative case file.

When asked by OIG to provide “dates, times, and locations of community engagement events with stakeholders (local community groups, City Council members, etc.)” enumerated within the TIP Guidance, COPA provided a letter dated August 1, 2023, and addressed to “Dear Elected Official,” which outlined the Timeliness Initiative’s process and criteria. COPA did not provide any additional context regarding who this letter was sent to, any events it participated in, or any subsequent follow up COPA received after providing information to these “elected officials” about the Timeliness Initiative. In a subsequent interview, neither COPA’s then-General Counsel nor a Director of Investigations (DOI) involved with the Timeliness Initiative could advise OIG regarding the intended or actual recipients of this letter.

Within its TIP Guidance, COPA stated that it conducted community outreach as an act of transparency and to allow the department to hear and consider external viewpoints or suggestions related to the Timeliness Initiative process. However, although COPA contacted some stakeholders and spoke publicly about the Timeliness Initiative, it did not engage with the full range of identified stakeholders who may have raised additional concerns regarding the parameters established under the Timeliness Initiative. During interviews with OIG, COPA did not note any changes or considerations of external viewpoints when it was creating the Timeliness Initiative parameters. Instead, COPA leadership stated that the Timeliness Initiative guidance and criteria for closures were created and reviewed internally by COPA’s investigative and legal staff.

2 | Internal Preparation

The TIP Guidance states, “During this review, assigned investigative staff will ensure all accused CPD members are properly entered into the CMS with the applicable allegations, complete all tasks and extensions in the CMS, enter interview dates for all interviewed parties, enter all interview exceptions for all non-interviewed parties, place all relevant evidence in the Final Folder in the CMS, place any draft closure documents in the Working Folder in the CMS, and generate a note in the CMS that identifies key pieces of evidence to assist in the TIP review.” These requirements align with COPA’s Investigative File Maintenance policy aimed at maintaining “thorough and complete administrative investigative files” which mandates that “COPA staff will incorporate administrative investigative file materials [...] in CMS by including detailed notes, uploading all evidence, reports, and records pertinent to the alleged misconduct.”⁴⁸

⁴⁸ Civilian Office of Police Accountability, “Investigative File Maintenance,” February 8, 2022, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2022/02/COPA-Policy_Inv-File-Maintenance_FINAL_2022-02-08.pdf.

COPA did not ensure that all relevant evidence for each investigation was uploaded into the Case Management System (CMS).

In several Timeliness Initiative investigations reviewed by OIG, the notes module in CMS indicates that certain evidence had been retrieved, uploaded, and reviewed by a COPA investigator, but the referenced evidence was not included for review within the electronic case file. Findings presented throughout the rest of this inquiry reflect a review of all investigations closed under COPA's Timeliness Initiative. However, OIG did not undertake a full audit of COPA's investigative file quality to determine the completeness of all case files for log number investigations closed during this initiative. OIG presents the following examples of deficiencies found within CMS case files rather than cumulative data on the quality of COPA's file maintenance.⁴⁹

Figure 15: Examples of investigations with deficient case files⁵⁰

Log Number	CMS Notes	Condition of File
2021-0002861	<ul style="list-style-type: none"> August 12, 2021: "POD [Police Observation Device] video received and forwarded to Inv. [REDACTED]." 	<ul style="list-style-type: none"> No POD video in attachments.
2021-0003624	<ul style="list-style-type: none"> September 14, 2021: "Uploaded A&A." September 17, 2021: "Emailed R/S [REDACTED] at [REDACTED]@yahoo.com (email uploaded)." 	<ul style="list-style-type: none"> No A&A sheets in attachments. No email correspondence in attachments.
2020-0003823	<ul style="list-style-type: none"> August 20, 2020: "Attached GPS to CMS." 	<ul style="list-style-type: none"> No GPS records in attachments.
2020-0005619	<ul style="list-style-type: none"> Various notes indicate negative searches for POD records, ISRs, event queries, and A&A sheets. April 6, 2021: "OEMC [Office of Emergency Management and Communications] Number Plate Search results obtained/uploaded." April 6, 2021: "R/I searched for Traffic Court Records and uploaded his citation outcome" 	<ul style="list-style-type: none"> No documentation of negative search results in attachments.⁵¹ No OEMC number plate search results in attachments. No traffic court records or POD records in attachments.

⁴⁹ This list is not exhaustive. Rather, OIG identified these examples during its review of closed Timeliness Initiative investigations.

⁵⁰ OIG redacted personally identifying information within the CMS notes.

⁵¹ OIG previously made recommendations to COPA regarding the documentation of negative search results. On May 29, 2020, COPA responded to those recommendations, noting, "Investigators are however required to include or note all search results, including negative results, in the investigation file" which allows "supervisors and others to efficiently review search terms and parameters for errors." However, making note of a negative search result without including any documentation of the search terms does not allow a supervisor to review search parameters for errors.

City of Chicago Office of Inspector General, "Recommendations to Inform and Improve Disciplinary Investigations Conducted by COPA and CPD's Bureau of Internal Affairs: Data Searches," June 30, 2020, accessed September 3, 2025, https://igchicago.org/wp-content/uploads/2023/08/Recommendations-to-Inform-and-Improve-Disciplinary-Investigations-Conducted-by-COPA-and-BIA_Data-Searches-.pdf

	[...] R/I uploaded a POD map, which showed no POD cameras in the immediate vicinity.”	
2020-0003280	<ul style="list-style-type: none"> July 28, 2020: “BWC capturing [REDACTED] engaging CPD PO uploaded. Screenshot stills from BWC uploaded.” 	<ul style="list-style-type: none"> No screenshots of BWC in attachments.
2020-0003818	<ul style="list-style-type: none"> October 27, 2020: “Uploaded ambulance run report to Genetec.” January 12, 2021: “Received medical records from Holy Cross Hospital.” 	<ul style="list-style-type: none"> No ambulance run report in attachments. No medical records in attachments.
2020-0002403	<ul style="list-style-type: none"> Various notes indicate negative searches for event queries, BWC video, and ISRs. 	<ul style="list-style-type: none"> No documentation of negative search results in attachments.

Source: OIG Analysis

As COPA acknowledges within its own policy, “maintaining investigative records in a uniform and comprehensive manner [is] for the benefit of its own employees and external stakeholders.”⁵² OIG found that the incomplete investigative files within cases closed under the Timeliness Initiative prohibited thorough external oversight of this initiative. Specifically, as not all evidence was available for review, in many cases OIG could not determine with certainty if there was alleged misconduct supported by objective, verifiable evidence which should have disqualified a case from closure under the Timeliness Initiative.

3 | TIP Review Process

According to COPA’s “Review Criteria” for the Timeliness Initiative, investigations containing “viable allegations” of certain types of misconduct were ineligible to be completed as Non-Disciplinary Closures (NDCs) under the initiative. Specifically, the TIP Guidance states that investigations related to the following allegations were not eligible for closure under the Timeliness Initiative:

- a. rule 14 violations or an act of dishonesty;
- b. domestic violence;
- c. sexual misconduct;
- d. unjustified uses of deadly force;
- e. unjustified uses of excessive force resulting in confirmed documented significant injury;
- f. unjustified uses of force on a restrained individual(s);
- g. non-procedural issues related to search warrant procurement or execution;
- h. intentional misconduct;
- i. any allegation that may result in a substantial disciplinary action;
- j. highly objectional instance of verbal abuse (as defined by MCC 2-78-10 [sic]);⁵³
- k. allegations arising from an investigation referred to the Cook County State’s Attorney for a potential criminal investigation;
- l. acts of retaliation by CPD members;

⁵² Civilian Office of Police Accountability, “Investigative File Maintenance.”

⁵³ COPA’s TIP Guidance incorrectly lists the statute which defines verbal abuse within the Municipal Code. In COPA’s Ordinance, verbal abuse is defined within MCC 2-78-100.

- m. allegations arising from an investigation garnering a high-level of public interest;
- n. officer-involved firearm discharges (excluding animal destruction);
- o. fatal motor vehicle pursuits;
- p. case re-opened at the request of external agencies (i.e., PSIG, CPD, DOL, or IMT), and
- q. although not an absolute disqualification, Review Staff will also consider whether potentially viable allegations involved vulnerable individuals, i.e., juveniles, the elderly, and disabled individuals.

COPA did not strictly adhere to its “Review Criteria” guidelines.

As noted above, not all cases closed under the Timeliness Initiative included all relevant evidence or documentation within CMS. As a result, OIG could not consistently and reliably determine whether allegations were “viable.” Further, under this initiative, COPA did not provide an analysis of the evidence within a summary document as it would if the investigation was brought to findings.⁵⁴ Instead, COPA review staff was advised to recommend training “if there’s a strong likelihood that a specific allegation(s) may have resulted in a Sustained finding.”⁵⁵ Therefore, investigations closed under the Timeliness Initiative that included training recommendations indicate that COPA determined there was “a strong likelihood” that the misconduct would have been sustained under normal investigative circumstances and thus these cases likely contain “viable allegations.”

As part of this inquiry and as part of its regular oversight responsibilities, OIG’s Public Safety Investigative Analysis Unit reviewed all cases COPA closed under the Timeliness Initiative. Although OIG identified additional investigations which contained allegations of misconduct deemed to be ineligible for closure under COPA’s TIP Guidance, the examples included here reflect only those which reasonably had sufficient evidence to support the viability of the allegations in question. The case studies provided below feature investigations closed under the Timeliness Initiative that 1) contain misconduct allegations listed as ineligible for closure under COPA’s “Review Criteria” guidelines, and 2) include training recommendations, indicating the misconduct in question likely would have been sustained and thus reflect “viable allegations.”⁵⁶

Case Study 1: Unjustified Use of Excessive Force with Significant Injury

- The complainant was arrested for drinking in public and resisting arrest. According to the arrest report, during handcuffing, the complainant pulled away and the accused CPD member conducted an emergency takedown. The complainant alleged that the accused CPD member kicked and punched the complainant in the face while the complainant was on the ground. The complainant was arrested and later went to the hospital to address their injuries which medical records show included multiple contusions and acute pain of the shoulder, wrist, and hip.⁵⁷ *COPA recommended De-Escalation training.*

Case Studies 2 and 3: Unjustified Uses of Force on Restrained Individuals

- During a Tactical Response Report (TRR) investigation initiated by CPD’s Tactical Review and Evaluation Division (TRED), the reporting Lieutenant observed a CPD member strike

⁵⁴ See Finding 1, Subsection C for more information on investigative summary documentation.

⁵⁵ See Finding 2 for more information on COPA’s training recommendations

⁵⁶ OIG’s Investigative Analysis Unit may recommend that investigating agencies reopen investigations which contain material deficiencies that may affect the outcome of an investigation. The cases included here may not fit the parameters of the Timeliness Initiative; however, OIG was unable to determine if the investigation itself was deficient and thus did not recommend COPA reopen these investigations.

⁵⁷ 2019-0002201

the subject in the back with a fist while the subject was handcuffed.⁵⁸ *COPA recommended Use of Force training.*

- According to police reports, the accused CPD member responded to a burglary and heard over the radio that the subject was fleeing on foot, at which point they identified and pursued the subject. In their TRR, the accused member reported that another CPD member conducted an emergency takedown and that the subject became an active resister by stiffening their body, pulling their left arm away from members' grip and placing it under their front beltline to avoid being handcuffed.⁵⁹ While attempting to handcuff the subject, the accused member used an expandable baton to strike the subject twice on the right leg. As shown on BWC, as the accused member went to strike the subject for the third time, another CPD member told the accused to stop, and the accused member did not strike the subject again. COPA noted that the accused member "tapped [the] handcuffed subject on the leg," which it does not consider "a substantial use of force," while noting the move was "still not within policy."⁶⁰ *COPA recommended the accused member be retrained on CPD's Use of Force policy, specifically baton use.*⁶¹

Case Study 4: Issues related to Search Warrant Procurement or Execution

- According to police reports, CPD members were dispatched to conduct a well-being check after a parent reported that their child with a cognitive delay went missing the day prior, and the child's phone was pinging inside of a residence. The responding Sergeant requested Chicago Fire Department (CFD) response for a forcible entry to check the residence. CFD opened the front window of the residence, and CPD members entered and searched the residence with negative results. During the search, BWC showed members looked through the homeowner's mail, checkbook and other personal belongings, including a piece of luggage and a backpack. The members left a Victim Information Notice in the mailbox. The homeowner provided COPA with pictures of the damage caused by CPD members and CFD. COPA noted, "The entry and search of the residence involve numerous 4th Amendment concerns within COPA's jurisdiction," but later determined this investigation was eligible for closure under the Timeliness Initiative as "exigent circumstances justified the entry of home." *Despite no investigatory stop occurring, COPA recommended ISR policy training for two accused officers and no training for the involved Sergeant.*⁶²

Further, OIG found that the "Review Criteria" eligibility guidelines were not robust enough to ensure that investigations were evaluated against the same standards across the review staff. For example, members of COPA's review staff reported different standards for "significant" injuries. In an interview with OIG, a COPA DOI stated that a "significant injury" meant someone who went to the hospital or received medical attention. However, a Supervising Investigator, who was on the frontlines of determining whether cases were eligible for closure, had a different standard for

⁵⁸ 2021-0002379; The TRED unit reviews and identifies deficiencies in CPD members' use of force incidents and addresses those deficiencies through non-disciplinary pathways. When they observe potential misconduct during their review, TRED members submit an initiation report to COPA for investigation.

⁵⁹ CPD policy defines an active resister as "a person who attempts to create distance between himself or herself and the member's reach with the intent to avoid physical control and/or defeat the arrest." Chicago Police Department, "General Order G03-02-01: Response to Resistance and Force Options," June 28, 2023, accessed September 3, 2025, <https://directives.chicagopolice.org/#directive/public/6605>.

⁶⁰ During an interview with OIG, a COPA Supervising Investigator referenced this case as an example in which the CPD member "need[ed] to be trained more than penalized."

⁶¹ 2020-0003765

⁶² 2021-0002669

“significant” injury and told OIG they considered the threshold to be if someone had a broken bone, needed stitches, or if there was a permanent disfigurement or permanent change in their lifestyle.

Additionally, the TIP Guidance states that Non-Disciplinary Closures apply to investigations that “will exceed the 18-month timeframe or have no reasonable certainty of concluding within 18 months are eligible for closure under the TIP, *unless there are viable allegations related to [the disqualifying parameters]* (emphasis added).” In effect, this means that all cases with evidence of disqualifying allegations were ineligible for closure, regardless of how much work was left to do in COPA’s investigative process. Nonetheless, COPA personnel made it clear that they considered the remaining timeline of an investigation as a factor in their decision to utilize Non-Disciplinary Closures. A COPA DOI stated that when a case was flagged for their review, they appraised the disqualifying allegations but had a “critical lens” for determining where COPA was in the investigation process to determine if the case should be closed. The DOI stated that they considered if interviews had been done and what was still outstanding in the investigation when determining whether or not to close the investigation under the Timeliness Initiative.

4 | Post Closure Activities

According to COPA’s TIP Guidance, “In response to complainant outreach and proactively without outreach, Case Liaisons will have contact with complainants concerning their complaint and the status of investigations.” In a June 2023 CCPSA Meeting, COPA’s then-Chief Administrator similarly stated that COPA’s Communications and External Affairs team was “working alongside the investigative team that’s going to be conducting these reviews so that they can proactively contact complainants about this process and make sure that they have their questions answered, they know what’s going on with their case, and we don’t have them just wait to receive a letter in the mail.”⁶³

The TIP Guidance further states that on COPA’s website “a section will be developed to publicly provide information pertaining to the TIP, to address projected questions from the public and complainants, and to make a request for contact concerning the TIP and/or any investigation subject to TIP review.” In alignment with this guidance, COPA created a Timeliness Initiative webpage which contains a video and writeup on the initiative’s process and criteria, a contact form, a Frequently Asked Questions (FAQs) section meant to address anticipated questions from the public and complainants, and a data dashboard.⁶⁴ (See Finding 3 for more information on COPA’s implementations of Post Closure Activity: Training Recommendations to CPD.)

COPA abandoned its plan to have Case Liaisons proactively reach out to complainants.

COPA provided OIG with a script intended to be used by Case Liaisons for its proactive outreach to complainants regarding the Timeliness Initiative. The script includes a brief summary of the initiative and encourages liaisons to stop the call after providing the summary if possible.

⁶³ Community Commission for Public Safety and Accountability, “Public Meeting,” June 29, 2023, 1:16:46, accessed September 3, 2025, <https://www.youtube.com/watch?v=9DZDwpyNC8I>.

⁶⁴ Civilian Office of Police Accountability, “Timeliness Initiative,” accessed September 3, 2025. As of January 2026, this webpage is no longer available on COPA’s website.

Figure 16: Case Liaison Script for Timeliness Initiative

Dear _____

Thank you for taking my call. I am calling because you filed a complaint with our office, and we are aware that it has taken some time for us to conclude the investigation. We acknowledge that there are challenges regarding the quick resolution of complaints and want to discuss how we are addressing this issue.

In an effort to expedite the conclusion of complaints similar to yours, we launched a new internal project called the *Timeliness Initiative*.

Process and Criteria

We identified a group of dedicated staff (four Investigators, two Supervising Investigators, one Director of Investigations, and one Deputy Chief Administrator) (Review Staff) to conduct a review of all current pending investigations 18 months or older.

This staff provided a consistent standardized review of allegations of misconduct such as late activation of body-worn camera, failure to complete an Investigatory Stop Report or other operational violations which resulted in training or other remedial recommendations. This does not indicate other actions were not investigated, however the allegations mentioned were resolved with training.

Your complaint was resolved by recommending _____ (give the type of training recommended from the notes) of the involved officer(s).

Are there any questions? **End here if possible.**

If the complainant says their initial complaint had what is described above, please explain the following:

- **For Not Sustained, Exonerated or Unfounded outcomes:**

We understand the nature of your complaint included _____ however we were not able to sustain the allegation. Meaning we did not have enough evidence to hold the officer accountable or it was determined to be exonerated or unfounded.

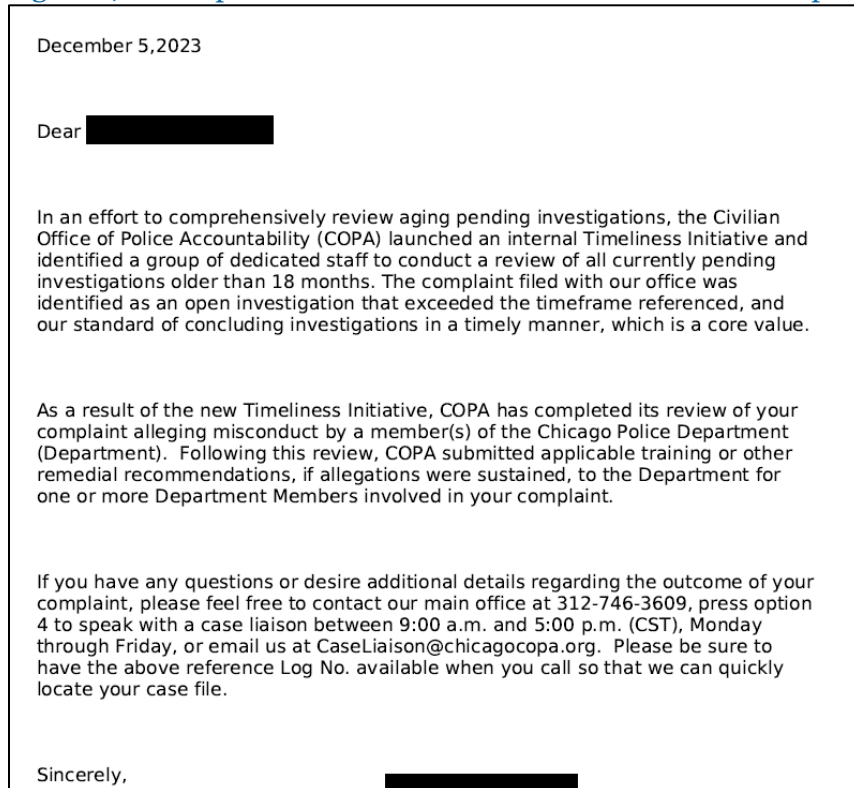
- **For Sustained outcomes:**

We are aware that the misconduct occurred, however at this point, the likelihood of the discipline being upheld through arbitration is low or non-existent. Training was the best outcome at this point.

Source: COPA (highlighting in original)

Although COPA created this script, OIG found that COPA did not move forward with its plan to proactively reach out to complainants. In response to OIG’s request for documentation of Case Liaisons’ proactive correspondence with Timeliness Initiative complainants, COPA stated that “although initial attempts were made to reach complainants via phone, the First Deputy modified the process and determined Case Liaisons should be readily available if complainants contacted COPA to answer questions and provide details of the outcome of the investigation after receiving the agency’s letter regarding Timeliness Initiative.” This process change was reflected in an interview with a COPA Case Liaison who, when asked, did not report engaging in any efforts to proactively reach out to complainants by phone. Rather, the Case Liaison reported that they only spoke to complainants when and if the complainant followed up with COPA after receiving letters sent by the Investigations team. The Case Liaison described the letters sent to complainants as “outside my role” and stated that Case Liaisons took over after the letters were sent. An example of the agency’s letter to complainants is shown below in Figure 17:

Figure 17: Example of Timeliness Initiative Letter Sent to Complainant



Source: COPA

Within COPA's TIP Guidance, steps are listed for how Case Liaisons should document any communication they have with complainants:

For any investigations subject to review under the TIP, Case Liaisons will notate on the Timeliness Tracking Spreadsheet and the CMS that contact with the complainant occurred, the nature/subject of the contact, and other pertinent information resulting from the complainant contact, i.e., the sharing of additional evidence, a request to reopen, or a renewed desire to participate in the investigation. Any significant communication with a complainant to be reported directly to Review Staff via email.

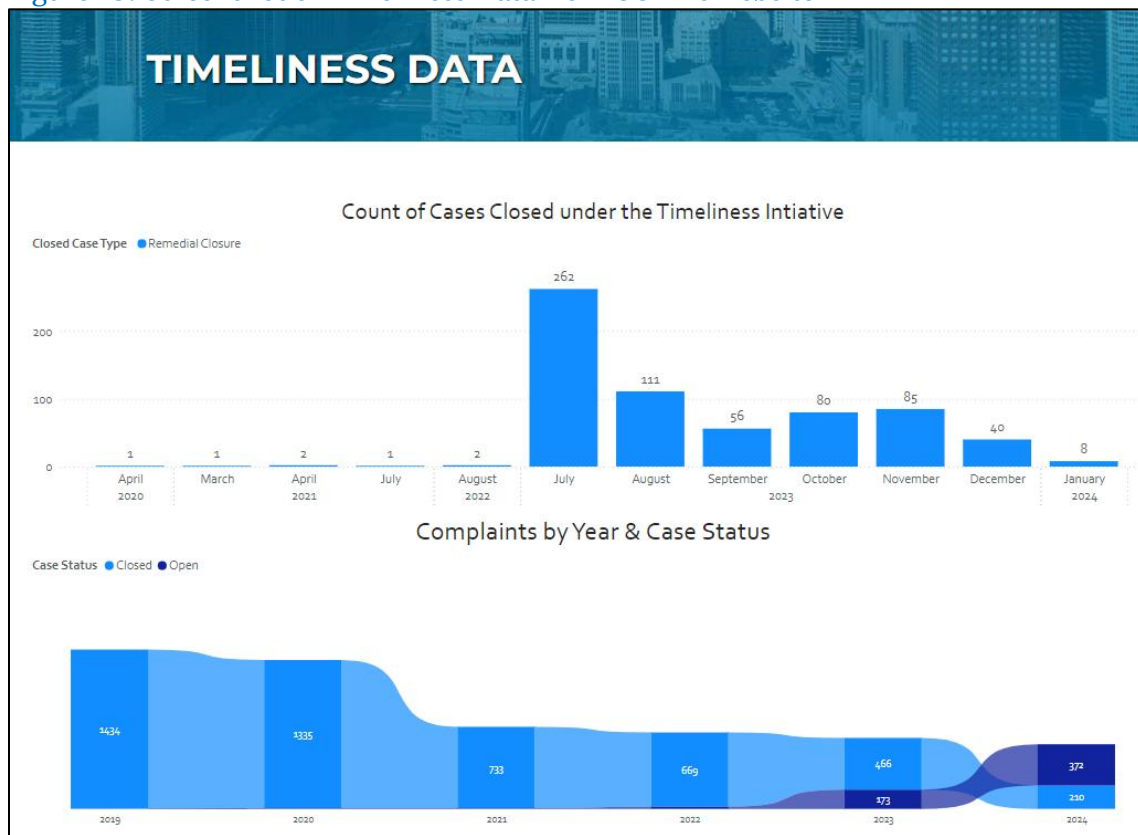
In response to an OIG request, COPA leadership stated that they tried to pull Case Liaison reports to determine how many complainant contacts were made but they were unable to confidently provide these reports. Instead, COPA provided Case Liaison notes made in CMS regarding their conversations with complainants. In one example, the liaison stated that they returned a call from the complainant's mother regarding the Timeliness Initiative letter they received. The note states that "during communication call disconnected" and there was no answer when the liaison tried to call back. Additional Case Liaison notes found by OIG within COPA's Timeliness Initiative tracking spreadsheets stated, "complainant displeased with outcome," and "CMS Notes show complainant has called for updates frequently and threatened to go to the media." A Case Liaison told OIG that they estimated the liaisons spoke to less than 20 complainants and said, "It was shocking... We were expecting to be inundated." During its review of COPA's Timeliness Initiative, OIG was only able to identify 11 investigations in which a Case Liaison documented that they spoke to the complainant regarding their case closure under the Timeliness Initiative.

COPA’s website meets the parameters within its TIP Guidance but does not include all information publicly promised by COPA leadership.

During a June 2023 CCPSA meeting, a CCPSA Commissioner asked COPA’s then-Chief Administrator if the cases closed under the Timeliness Initiative “will be made public with the decision of the type of closure that you’re proposing...will [these decisions] still be regularly available?” The Chief Administrator agreed and told the Commissioner that COPA’s Timeliness Initiative dashboard would help the public understand “the number and kinds of cases, and the number of training recommendations that are being made, etc.”⁶⁵ Similarly, COPA’s Timeliness Initiative FAQ page states that its webpage will provide “examples of the type of training and closure outcomes.”

However, despite the Chief Administrator’s comments regarding additional information that would be available on the website, COPA’s Timeliness Initiative Data page only provides information on the number of cases closed under the Timeliness Initiative and the complaints by year and status. There is no information regarding the types of cases closed under this initiative nor any related recommended training data.

Figure 18: Screenshot of Timeliness Data from COPA’s website



Source: COPA Timeliness Initiative Data webpage as of October 16, 2024⁶⁶

⁶⁵ Community Commission for Public Safety and Accountability, “Public Meeting,” June 29, 2023, 1:29:33, accessed September 3, 2025, <https://www.youtube.com/watch?v=9DZDwpyNC8I>.

⁶⁶ Civilian Office of Police Accountability, “Timeliness Initiative Data,” accessed September 3, 2025. As of November 2025, this webpage is no longer available on COPA’s website.

In an effort to increase transparency around the initiative, COPA promised to publish “a special report to be released on COPA’s website detailing the Timeliness Initiative” (hereafter “TIP Special Report”).⁶⁷ Published in December 2024, the TIP Special Report does provide some cumulative data about the initiative, but OIG found several unsubstantiated claims made by COPA within the report.⁶⁸ For example, as justification for why the Timeliness Initiative was needed, COPA claimed “the longer the investigation – and older the incident – the higher the likelihood an arbitrator will grant the grievance based upon lack of timeliness alone.”⁶⁹ While COPA leadership stated publicly that they worked to determine “the factors that contribute to lack of success in an arbitration,” when OIG asked for the reports or documentation stemming from this review, COPA provided seven individual arbitration awards in which the timeliness of the investigation was mentioned.⁷⁰ These documents do not constitute a sufficient analysis to claim the “higher likelihood” causal relationship COPA makes within the TIP Special Report. Regarding the use of Non-Disciplinary Closures to complete additional investigations under Phase 2 of the initiative (See more on Phase 2 in Finding 1, Subsection B), COPA states in the report, “In this necessary cost-benefit analysis, it soon became clear that appropriate use of...non-disciplinary closures of certain investigations, was necessary to most effectively mitigate risk posed by the new time limit.”⁷¹ In interviews with OIG, COPA personnel made no mention of any cost-benefit analysis or other analysis conducted to determine the most effective way to mitigate risk. Instead, a Director of Investigations told OIG that COPA chose which cases to work on based on its finite resources and the inability to force people to work overtime during the holidays. Finally, within the TIP Special Report COPA makes various recommendations to other City agencies and “urges all stakeholders, including CPD, DOL, CCPSA, and the Office of Inspector General/PSIG, to participate in promoting timelier outcomes and drawing attention to this enduring challenge in the city’s accountability system.”⁷² Although COPA seemingly is making recommendations for these entities, to OIG’s knowledge, COPA did not send the TIP Special Report to leadership within the agencies outlined.

5 | Reopening

COPA’s TIP Guidance states that, “In determining if an investigation closed under this project should be reopened, applicable re-opening of investigation policy/guidance will be used to evaluate whether an investigation should be re-opened...Nothing in this guidance limits the re-opening of any investigation at the direction of the Chief Administrator, or designee, or any instance where an external entity with the proper authority (i.e., DOL, IMT, PSIG, CPD) request the investigation to be reopened.”

COPA did not meaningfully address most of OIG’s recommendations to reopen cases closed under the Timeliness Initiative.

In advocating for the use of this case closure strategy, COPA made several public references to OIG’s Public Safety Section as a safety mechanism for investigations closed under the Timeliness

⁶⁷ Civilian Office of Police Accountability, “Timeliness FAQs,” accessed September 3, 2025. As of January 2026, this webpage is no longer available on COPA’s website.

⁶⁸ Civilian Office of Police Accountability, “COPA Timeliness Initiative Project,” December 2024, accessed September 3, 2025, <https://www.chicagocopa.org/wp-content/uploads/2024/12/Special-Report-Timeliness-FINAL-12.9.24.pdf>.

⁶⁹ Civilian Office of Police Accountability, “COPA Timeliness Initiative Project,” 5.

⁷⁰ “COPA Set to Close Hundreds of Police Misconduct Cases,” *WTTW Chicago Tonight*, June 28, 2023, accessed November 25, 2025, <https://www.pbs.org/video/copa-set-to-close-hundreds-of-police-misconduct-cases-qm0fc4/>.

⁷¹ Civilian Office of Police Accountability, “COPA Timeliness Initiative Project,” 6.

⁷² Civilian Office of Police Accountability, “COPA Timeliness Initiative Project,” 12.

Initiative. For example, at a June 2023 CCPSA meeting, COPA's then-Chief Administrator told attendees, "These are going to be judgement calls that ultimately get made but the thing I think community members, this commission, and other stakeholders should take heart in is that we have the ability to reopen cases as well. Our closed cases are always reviewed by the Public Safety Inspector General and her team...they'll know where to look and what to try to identify."⁷³ Additionally, COPA's TIP Special Report states that "The Public Safety Inspector General (PSIG) served as another guard rail; per its authority, it continues to perform case reviews of closed investigations under the TIP and issued Requests to Re-Open on several."⁷⁴ Despite these statements, COPA has mostly disregarded OIG's recommendations to reopen cases closed under this initiative.

Overall, OIG recommended reopening 11 investigations closed under the Timeliness Initiative (See Appendix A). COPA agreed to reopen five Timeliness Initiative cases at PSIG's recommendation. In one reopened investigation, OIG found COPA had incorrectly identified the accused officer.⁷⁵ In another reopened investigation, COPA placed it in a Closed Hold status pending the outcome of the member's Police Board hearing concerning similar misconduct.⁷⁶ And in a third investigation, COPA agreed to reopen the case to address excessive force allegations it had not previously considered but then administratively closed it because too much time had passed to bring the allegations against the involved members.⁷⁷ In its TIP Special Report, COPA stated that some investigations were not reopened "due to lack of viable allegations."⁷⁸ In an interview with OIG, a COPA DOI stated that "each case is different" and it is possible, when determining whether or not to reopen an investigation, that COPA evaluated what was a "viable allegation" differently than OIG.⁷⁹ The DOI stated that they, along with COPA's Legal Department, were responsible for deciding if an investigation should be reopened. The DOI stated that the Legal Department helps determine if reopening an investigation is a good or efficient use of COPA's resources, including any investment needed for potential arbitration.

OIG provided individual recommendations to reopen these Non-Disciplinary Closures based on its review of the available evidence and specific allegations unique to each case. As shown in Figure 19 below, COPA declined five separate recommendations to reopen investigations with a single letter broadly outlining the review process of the Timeliness Initiative.

⁷³ Community Commission for Public Safety and Accountability, "Public Meeting," June 29, 2023, 1:25:28, accessed September 3, 2025, <https://www.youtube.com/watch?v=9DZDwpyNC8I>.

⁷⁴ Civilian Office of Police Accountability, "COPA Timeliness Initiative Project," 10.

⁷⁵ 2020-0002897

⁷⁶ 2020-0001911

⁷⁷ 2021-0002050; COPA cited the Illinois Municipal Code 65 ILCS 5/10-1-18.1 that prohibits disciplinary charges based upon allegations of unreasonable force by a police officer due to the five-year statute of limitations.

⁷⁸ Civilian Office of Police Accountability, "COPA Timeliness Initiative Project," 10.

⁷⁹ OIG is tasked with identifying and recommending investigations be reopened if it "finds a deficiency that it concludes materially affected the outcome of the [disciplinary misconduct] investigation" MCC-2-78-230 (c).

Figure 19: Declination Letter from COPA Chief Administrator⁸⁰

I am in receipt of your letters recommending that COPA re-open and conduct additional investigation in Log Nos. 2019-4748, 2021-2944, 2022-0083, 2019-0914, 2019-2893. We understand the Office of the Inspector General - Deputy Inspector General for Public Safety (PSIG) recommends re-opening these cases to complete an investigation. COPA does not concur with PSIG's recommendations to re-open.

COPA conducted a rigorous review of each of these cases prior to closure. At least two COPA staff members, including a director or deputy chief, considered available evidence to determine the practicality of continued investigation. In each of these cases, COPA determined either that there are no viable allegations of misconduct that could be sustained or that it is improbable that discipline would be imposed. Notably, several of the cases were over three years old. A review of arbitrator decisions involving similarly situated cases demonstrates that it is very unlikely that any discipline would be imposed.¹

Source: COPA response to OIG recommendations to reopen investigations

Although COPA's guidance and public statements indicate that the Timeliness Initiative investigations would be subject to PSIG review—and PSIG did review all cases closed under the Timeliness Initiative—in practice COPA did not accept all of OIG's recommendations to reopen these cases to address deficiencies.

B | COPA's Phase 2/45-Day Closure efforts allowed for previously disqualified cases to be completed as Non-Disciplinary Closures under the Timeliness Initiative.

The original TIP Guidance refers to the process evaluated in Section A of this finding as "Phase 1" of the Timeliness Initiative which was originally intended to review all open investigations initiated between 2019 and 2021, while "Phase 2" was expected to focus on aging cases from 2022. However, in practice, COPA completed its review of 2022 cases early, and the envisioned "Phase 2" was blended with a "45-day closure" project following new investigative timeline constraints mandated within an amended police union contract.

On December 13, 2023, City Council ratified the City's amended collective bargaining agreement (CBA) with the Fraternal Order of Police (FOP). This amended CBA contains a section outlining "Investigation Time Limits." Specifically, the section states:

Effective for disciplinary investigations concluding forty-five (45) days after the date of ratification of this collective bargaining agreement, in the event the Employer recommends a disciplinary penalty upon an Officer as a result of a disciplinary investigation that took more than eighteen (18) months to conclude, as measured from the date on which the investigation was opened...the Arbitrator...shall convene a hearing, preliminary to the hearing on the merits, to determine whether there was a reasonable basis for the investigation to take longer than eighteen (18) months.⁸¹

⁸⁰ 2019-0004748, 2021-0002944, 2022-0000083, 2019-0000914, 2019-0002893

⁸¹ The City of Chicago and the Chicago John Dineen Lodge No. 7 (formerly known as the Fraternal Order of Police, Lodge No. 7). (2023). *City of Chicago's comprehensive offer to resolve terms of collective bargaining agreement, term of agreement: July 1, 2017 to March 1, 2027*, <https://occprodstoragev1.blob.core.usgovcloudapi.net/matterattachmentspublic/025ccdc9-4185-4c1b-bfea-176df72253cc.pdf>.

That is, beginning 45 days after ratification, if COPA takes longer than 18 months to complete a misconduct investigation, the case is subject to a “reasonable cause” hearing to determine whether COPA was warranted in taking additional time to conclude its investigation. If the arbitrator determines there were not valid reasons for delays, any discipline may be thrown out. Based on this new investigative deadline, COPA leadership took steps to resolve additional aging investigations within this 45-day “ramp up” period and issued new guidance under its “COPA Timeliness Closure Review Phase 2: FOP Contract/Time Limits” document (“TIP Phase 2 Guidance”).

According to the TIP Phase 2 Guidance, “While COPA leadership was, on occasion, apprised of ongoing negotiations with the FOP, it did not expect that either the investigative time limit of 18 months or the ‘ramp-up’ of 45 days would be so short.” COPA leadership described the time limits as “a shock to us and news to us” and reported that COPA had pushed for the new investigative time limit to be set at two years. Within these new parameters, COPA had until January 27, 2024 “to review and attempt to close all its open investigations before triggering the process under which ‘reasonable cause’ hearings may be requested – and grievances likely sustained.” As such, COPA determined that “expansion of the eligible cases for closure under the existing Non-Disciplinary Closure Memorandum was also needed to ensure the fewest number of cases over 18 months old were left open beyond January 27, 2024.”

Under this expanded guidance, at “the discretion of the Chief Administrator and appropriate investigative Deputy Chief Administrator (or designee), COPA may administratively close any case by non-disciplinary recommendation under a ‘totality of circumstances’ determination of the following factors: seriousness of the allegation, likelihood of success on the merits, likelihood of success in a ‘reasonable cause’ hearing, the pendency of related criminal or civil litigation, necessary investigative steps remaining, and need for public accountability.” The only investigations deemed “ineligible for non-disciplinary closure under this memorandum are those 1) with anticipated disciplinary recommendations of 180 days to separation; or 2) with related pending criminal litigation against the accused officer and/or referral to a local prosecutor’s office” (emphasis in original). When OIG asked how COPA determined if misconduct allegations would warrant 180-day suspensions or more, a COPA DOI reported that the decision was a “very fact specific thing” and said cases that were severe would “stand out to [them].”

During this timeframe, from December 14, 2023, to January 27, 2024, COPA maintained a “45-Day Closure Initiative” spreadsheet that tracked all cases closed during this period. OIG’s review of this spreadsheet found 178 log number investigations were closed during this time including 26 cases closed under the expanded Timeliness Initiative as Non-Disciplinary Closures.

The following case studies highlight investigations COPA originally deemed ineligible for closure under its “Phase 1” parameters, as they involved allegations ranging from domestic violence to unjustified uses of force, but later closed without disciplinary action under “Phase 2” of the Timeliness Initiative.

Case Study 5

- The complainant alleged the accused CPD member, who is their ex-spouse, threatened to run a background check on the complainant’s new partner, threatened to punch the complainant in the face, and told the complainant that they “have a hard time looking at you without trying not to choke you out.” The complainant told COPA that the accused CPD member was not physically abusive during their marriage but did report an incident where,

prior to the CPD member being employed by the Department, the CPD member pointed a gun at the complainant. The complainant shared an audio file of the CPD member calling the complainant a "stupid dumb bitch," a "broke-ass bitch," and a "dirty ass bitch." *COPA recommended retraining on Professionalism.*⁸²

Per COPA's TIP Guidance and confirmed by a COPA Supervising Investigator, domestic violence allegations were ineligible for closure under Phase 1 parameters.⁸³

Case Study 6

- According to police reports, the accused CPD member deployed their Taser on an assailant resisting arrest. Evidence showed that the Taser was deployed for a total duration of 16 seconds. CPD's Taser Use policy requires members to switch to other force options or justify their continued use of a Taser if the subject has been exposed to 15 cumulative seconds of energy. This Department policy notes that "Prolonged Taser exposure under certain circumstances may increase the risk of serious injury or death."⁸⁴ As reported in the TRR, after the arrestee reached for the duty belt of the accused CPD member's partner, the accused CPD member struck the arrestee in the face with the Taser causing a laceration. *COPA recommended Use of Force training.*⁸⁵

COPA initially deemed this investigation ineligible for closure in September 2023 due to "excessive force/deployed Taser at fleeing motorist." However, COPA closed this case under Phase 2 and provided the following explanation: "Closed under TIP. Excessive taser discharge; accused still need to be interviewed. Per [Deputy Chief Administrator], close under TIP. multi taser discharges. Individual [sic]/offender is actively resisting by fighting back. one discharge close to 15 sec limit. Will hit 3 year 3/24. No delay justified by notes."

Case Study 7

- Per COPA's incident description, the complainants violated a City-wide curfew set following wide-spread protests in the summer of 2020. It was alleged that a CPD member hit a complainant in the head with a metal baton, which required staples. At the time this incident occurred, sworn affidavits were required to proceed with misconduct investigations of CPD members. When complainants do not wish to provide sworn affidavits but the investigating agency determines there is objective, verifiable evidence to support the allegations, the agency can seek and obtain an affidavit override, which COPA did in this case.⁸⁶ *COPA recommended training related to seeking medical care after Use of Force incidents for two members related to this investigation.*⁸⁷

⁸² 2019-0004567

⁸³ According to MCC 2-78-100, "Domestic violence" includes physical abuse, harassment, stalking, intimidation, or violations of orders of protection.

⁸⁴ Chicago Police Department, "General Order G03-02-04: Taser Use Incidents," June 28, 2023, accessed August 13, 2025, <https://directives.chicagopolice.org/#directive/public/6575>.

⁸⁵ 2021-0000918

⁸⁶ See City of Chicago Office of Inspector General, "Evaluation of the Use of the Affidavit Override in Disciplinary Investigations of Chicago Police Department Members," December 17, 2020, accessed September 3, 2025, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Evaluation-of-the-Use-of-the-Affidavit-Override-in-Disciplinary-Investigations-of-CPD-Members.pdf>. City of Chicago Office of Inspector General, "Follow-up to OIG's Evaluation of the Use of the Affidavit Override in Disciplinary Investigations of Chicago Police Department Members," January 31, 2025, accessed September 3, 2025, <https://igchicago.org/wp-content/uploads/2025/01/Use-of-the-Affidavit-Override-in-Disciplinary-Investigations-of-CPD-Members-Follow-Up-.pdf>.

⁸⁷ 2020-0002283

This case was initially categorized as ineligible for closure under Phase 1 of the Timeliness Initiative based on a July 2023 email which listed the reasoning as “protest case, baton strikes with staples to head.” Yet under Phase 2, COPA closed this case and stated, “Closed under TIP. Protest case- baton strike to head (not sustained); failure to render medical aid for 2nd PO (sustained). Multiple POs involved have resigned, we interviewed the wrong primary accused (has a common name); no video evidence of baton strike; medical records confirm head laceration but investigative team assessed that, barring an admission from the PO, we do not have enough evidence to prove how the complainant was injured or by whom.”

Case Study 8

- According to BWC footage, during a well-being check of a driver asleep in a running vehicle with a child in the backseat, responding CPD members arrested the complainant for Driving Under the Influence (DUI). After hearing their partner’s BWC beep, one of the responding CPD members was seen on camera mouthing “turn it off” and subsequently telling their partner out loud to “turn it off.” While in lockup, the complainant and the accused CPD member struggled in a cell as the accused CPD member attempted to conduct a pat down of the complainant. BWC footage showed the complainant’s face hit the wall and when the complainant was moved, their face was bleeding from a laceration, there was blood on the wall, and a witnessing CPD member observed that the complainant had urinated on themselves. *COPA recommended Use of Force training and BWC Activation training for the accused member who struggled with the complainant. COPA did not recommend any retraining for the responding officer who deactivated their BWC early and repeatedly advised their partner to deactivate their BWC.*⁸⁸

In September 2023, this case was marked for additional review by a Supervising Investigator during Phase 1 with notes stating, “push of person in handcuffs in station into wall causing injury.” According to records, a COPA DOI deemed this case was ineligible for closure during the original review as it “involves an unjustified use of force against a restrained individual.” In December 2023, COPA determined the “subject was intoxicated and it is arguable that [they] fell/tripped and hit the wall; regardless, no serious injuries.”

Case Study 9

- According to police reports, CPD members responded to a battery in progress call where it was reported that the subject had a knife. The accused CPD members attempted to detain the subject who struck and shoved a CPD member. After tasing the subject twice, one of the accused CPD members used the drive-stun Taser method on the subject.⁸⁹ *COPA recommended retraining on Use of Force.*⁹⁰

This investigation had been deemed ineligible for closure in Phase 1 due to allegations of unjustified use of excessive force as the “drive stun [was] applied after subject was tased twice, on the ground, and not an assailant.” COPA closed this case under Phase 2 and stated, “Improper taser discharge (dry [sic] stun); accused still need to be interviewed. Not

⁸⁸ 2020-0004636

⁸⁹ Rather than discharging the probes of a Taser, a drive stun is “the use of the device by [direct] physical contact to drive stun a person.” CPD policy (G03-02-04) prohibits the use of drive stuns unless the person is an assailant and other force options are not readily available. CPD (G03-02-01) defines an assailant as “a person who is using or threatening to use force against another person or himself/herself which is likely to cause physical injury.” Chicago Police Department, “General Order G03-02-04: Taser Use Incidents.” Chicago Police Department, “General Order G03-02-01: Response to Resistance and Force Options.”

⁹⁰ 2021-0003140

a separation case... Use of taser is not in question, but the method: Offc [sic] use a drive stun instead of normal taser deployment.”

Case Study 10

- Within Freedom of Information Act requests sent to CPD, the complainant alleged that CPD members used excessive force against multiple juveniles at a school by striking them with batons, punching them, throwing them down the stairs, pushing them against walls, and slamming them to the floor. *COPA recommended retraining on Use of Force and De-Escalation.*⁹¹

In July 2023, this investigation was deemed ineligible for closure in Phase 1 and marked as a “melee at high school” that was “under investigation.” COPA records show the original Timeliness Initiative review recommendation for this investigation was “Close with FSR given how complaint was generated (media request) and involved parties (students).”⁹² In December 2023, this investigation was closed as an NDC with notes stating, “[High School]: sustained, excessive force (baton strikes), one PO interview still needed; FSR not drafted. Case involves melee at high school, but the officers' actual uses of force are not outside scope of the [Timeliness Initiative] memo.”

C | As conceived and implemented, the Timeliness Initiative conflicts with COPA’s mission, public statements, and accountability mandates.

In order to meet its vision “to be the leader in police accountability by conducting thorough investigations, to advance the culture of policing and build trust in civilian oversight,” COPA must investigate all alleged misconduct with viable allegations within its jurisdiction.⁹³ Investigative shortcuts, like those taken within the Timeliness Initiative, risk damaging COPA’s institutional credibility as well as public confidence in its ability to appropriately investigate police misconduct. While touted as a “one time effort,” this is not the first time COPA has attempted to close aging cases under a new policy (see again OIG’s Advisory Concerning the Civilian Office of Police Accountability’s Practice of Administratively Terminating Disciplinary Investigations). Therefore, OIG highlights the areas of concern below which should be considered if COPA plans any future large-scale investigative closure efforts.

⁹¹ 2021-0004695

⁹² “School fight ends with 4 Clemente High School students arrested on NW Side, police say,” *ABC7 Chicago*, November 19, 2021, accessed September 3, 2025, <https://abc7chicago.com/post/school-fight-roberto-clemente-high-chicago-ukrainian-village-students-arrested/11254591/>.

⁹³ Civilian Office of Police Accountability, “Vision & Mission.”

1 | Narrow disqualification parameters resulted in more than just low-level offenses being closed under the Timeliness Initiative.

In characterizing the Timeliness Initiative, COPA leadership stated that the review staff was

really looking at more of our low-level operational violations. Typically, those look like failure to activate body worn cameras in a timely manner, sometimes failure to properly document a police encounter. Again, looking at cases not where that was done intentionally by an officer or having been done repeatedly by an officer, but what is truly, perhaps, a mistake and something where training or a non-disciplinary recommendation may in fact be the most appropriate resolution.⁹⁴

This impression is reflected in the Independent Monitor's IMR-9 report which states, "COPA noted that only low-level administrative violations, complaints, or infractions were addressed in this initiative."⁹⁵ By these accounts, one would expect the guidelines established under the Timeliness Initiative to set criteria by which significant misconduct allegations would not be completed as NDCs.

However, OIG found many investigations closed under the Timeliness Initiative contained concerning, serious allegations. Only 95 allegations (6.2%) closed under the Timeliness Initiative had a Primary Category Code of "Operation/Personnel Violation" likely indicating cases with only low-level administrative violations, whereas 399 allegations (25.9%) closed were categorized as "Excessive Force," and 985 allegations (63.9%) were categorized as "Civil Rights Violation."

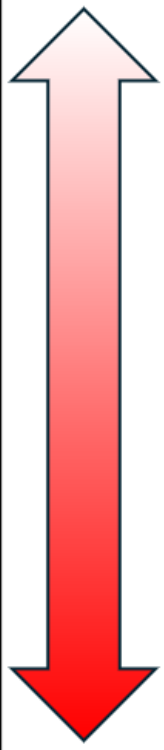
Rather than listing types of cases which *could be closed* under the initiative, COPA "developed stringent guidelines around what kinds of cases are not eligible for closure under this initiative." These narrow disqualifying parameters meant only investigations with specific allegations would be ineligible for closure and all other cases not meeting those criteria could be closed as NDCs. In its review of closed Timeliness Initiative investigations, OIG discovered several cases which contained serious and concerning behavior not specifically enumerated as disqualifying allegations. As such, OIG provides the case studies in this section to show how COPA's narrative that the Timeliness Initiative would only be used to close "low-level offenses" was inaccurate and misleading.

As shown in Figure 20, Department policy outlines different levels of reportable uses of force by CPD members:

⁹⁴ "COPA Set to Close Hundreds of Police Misconduct Cases," *WTTW Chicago*, June 28, 2023, 3:20, accessed September 3, 2025, <https://www.pbs.org/video/copa-set-to-close-hundreds-of-police-misconduct-cases-gm0fc4>.

⁹⁵ Independent Monitoring Report, "Appendix 9: Accountability and Transparency Compliance Assessments," May 23, 2024, 42, accessed August 13, 2025, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR9-Appendix-9-Accountability-and-Transparency.pdf>.

Figure 20: Department Use of Force



Least Severe	Use of Force Level	Description	Examples within Policy
	Level 1	Force that is reasonably expected to cause pain or injury, but does not result in injury or complaint of injury.	<ul style="list-style-type: none"> • Pressure point compliance • Wristlocks and armbars • Any leg, takedown, or weaponless direct mechanical action (including kicks, knee strikes, elbow strikes, closed hand strikes, or punches) that does not result in an injury or complaint of injury.
	Level 2	Force that includes use of a less-lethal weapon or that causes an injury or results in a complaint of injury.	<ul style="list-style-type: none"> • Force against a person restrained and controlled • Impact weapons (e.g., batons) to the body other than the head or neck • Any leg, takedown, or weaponless direct mechanical action (including kicks, knee strikes, elbow strikes, closed hand strikes, or punches) that does result in an injury or complaint of injury • OC spray • Taser • Canines
Most Severe	Level 3	Force that constitutes deadly force, force that causes injury to any person resulting in admission to a hospital, force that causes the death of any person.	<ul style="list-style-type: none"> • Discharging a firearm • Using an impact weapon to intentionally strike a person's head or neck • Using a chokehold (applying any direct pressure to the throat, windpipe, or airway) • The application of carotid artery restraints (techniques that compress the blood vessels in the neck to inhibit or restrict blood flow) • The application of other restraint above the shoulders with risk of positional asphyxiation

Source: OIG visualization of CPD's "General Order G03-02-02: Incidents Requiring the Completion of a Tactical Response Report"⁹⁶

As shown above, applying direct pressure to the throat, windpipe or airway constitutes a Level 3 use of force. Use of force to the neck incidents are also highlighted within the City's consent decree, which specifically prohibits CPD members "from using carotid artery restraints or chokeholds (or other maneuvers for applying direct pressure on a windpipe or airway, i.e., the front of the neck, with the intention of reducing the intake of air) unless deadly force is authorized. CPD officers must not use chokeholds or other maneuvers for intentionally putting pressure on a person's airway or carotid artery restraints as take-down techniques."⁹⁷ In an interview, OIG asked a COPA Supervising Investigator about how they assessed whether a case was eligible for closure under the Timeliness Initiative if there were allegations that may be a matter of interpretation, like those involving force to the neck area. The Supervising Investigator stated that, as a Level 3 use of force, chokeholds would likely be considered ineligible for closure under the Timeliness Initiative. However, they noted it could be questioned whether the force was an actual chokehold or simply touching somebody's neck. Investigations involving Level 3 uses of force are not listed as

⁹⁶ Chicago Police Department, "General Order G03-02-02: Incidents Requiring the Completion of a Tactical Response Report," June 28, 2023, accessed September 3, 2025, <https://directives.chicagopolice.org/#directive/public/6610>.

⁹⁷ Consent decree, ¶ 178.

disqualifying allegations within the Timeliness Initiative “Review Criteria,” despite these actions potentially constituting deadly force, and thus by definition not being “low-level offenses.” OIG identified multiple cases closed as NDCs which involved allegations of CPD members using force to the neck. Rather than bringing disciplinary charges for these allegations, COPA recommended retraining on CPD’s Use of Force or De-Escalation policy for the case studies outlined below.

Case Studies 11, 12, 13, and 14: Force to the Neck

- Per police reports, a subject failed to follow verbal commands and Department members performed an emergency takedown and handcuffing. A Sergeant initiated this investigation after reviewing the accused CPD member’s BWC footage, which showed the member placing their knee on the subject’s neck while attempting to handcuff them.⁹⁸ COPA recommended *Use of Force and BWC Activation training*.
- According to police reports, a subject escaped from police custody and was apprehended. During this apprehension, a CPD member kned the subject in the back while the subject was lying on the curb. A CPD member was also alleged to have placed their arm around the subject’s face and momentarily around the subject’s neck.⁹⁹ COPA notes indicate “Sustained force (knee to torso, hand to neck).” COPA recommended *the involved CPD members receive retraining on Form Reporting, De-Escalation, and Professionalism*.
- During an arrest, a CPD member performed an emergency takedown and BWC showed the member drop their knee onto the subject. The subject was heard on BWC stating, “You goin’ to step on my neck?” several times. The CPD member did not note any use of their knee in their TRR but told COPA in an interview that they used their knee on the arrestee’s “upper back.” BWC of the incident showed a responding Sergeant tapping and nudging the member to move off the subject several times. COPA recommended *Use of Force and BWC Activation training*.¹⁰⁰
- According to police reports, CPD members detained a subject who refused questioning and spit at a CPD member. A Lieutenant reviewing the incident marked the TRR as not in compliance and stated, “[t]he officer placed [their] hand on the side of the neck and back of the neck of [the subject] for approximately three (3) seconds to prevent the person from [s]pitting on [them] again. It is not clear if the action was retaliatory in nature.” The CPD member wrote in their TRR that they “put [their] open hand at the last known location where [they] remembered [the subject’s] head was at and pushed and held [the subject’s] head away from [the CPD member].” Lockup cameras show the CPD member pushed on the subject’s neck with their hand.¹⁰¹ COPA recommended *Use of Force training*.

Further, while not a reportable use of force, CPD members “may only point a firearm at a person when it is objectively reasonable to do so under the totality of the circumstances faced by the member on the scene.”¹⁰² The investigation below included allegations against a CPD member for “displaying a firearm at or near close proximity to Complainant’s head area without justification.”

⁹⁸ 2022-0000777

⁹⁹ 2022-0000683

¹⁰⁰ 2019-0003600; This incident involves the same accused member as Log Number 2022-0000777 above.

¹⁰¹ 2022-0003586

¹⁰² Chicago Police Department, “Special Order S03-22: Firearm Pointing Incidents,” April 15, 2025, accessed September 3, 2025, <https://directives.chicagopolice.org/#directive/public/7079>.

COPA's CMS notes, dated July 5, 2023, indicate the agency reached sustained findings for this allegation but still closed the case as a Non-Disciplinary Closure under the Timeliness Initiative.

Case Study 15: Gun to Head

- After pulling over a complainant for reckless driving, a CPD member broke the driver's windshield with a flashlight. At the same time, another member opened the passenger door, entered the car, and pointed a firearm at the driver's head before pushing the driver out of the vehicle.¹⁰³ This interaction was captured on BWC and COPA obtained an affidavit override for this investigation in 2021.¹⁰⁴ The affidavit override stated that, "Failure to pursue a full comprehensive investigation into an incident of this nature would certainly undermine public confidence in the Department." *COPA recommended De-Escalation training.*

Finally, OIG discovered investigations closed under the Timeliness Initiative in which not all misconduct was considered or addressed by COPA. These unidentified allegations raise concerns that COPA's accelerated review process, in which Supervising Investigators were only looking for specific disqualifying allegations before closing investigations, allowed misconduct to go unaddressed by the agency responsible for thoroughly investigating the incident.

Case Studies 16 and 17: Misconduct Missed or Not Addressed by COPA

- CPD members initiated a traffic stop when the complainant failed to stop at a stop sign. On BWC, CPD members reported smelling alcohol and observing an open bottle of alcohol on the rear passenger seat as they approached the vehicle. The complainant and their passenger were subsequently ordered out of the vehicle. One of the CPD members told the complainant, "Listen, relax, all you had to do is comply... I'm explaining why I pulled you out the car. I smell alcohol, I asked you to step out, I smelled the weed, I didn't want to put that on here," as the member tapped their BWC. The CPD member told the complainant, "I don't want to take anybody to jail...if my Sergeant comes over here it's gon' be over." As CPD members searched the vehicle, they verbally agreed that the driver was likely intoxicated. During the vehicle search, one of the CPD members observed a small bag containing an unknown substance and stated to their partner, "Ay, grab that ...and don't let [them] see that, you hear me? Don't let Sarge see that right there." The CPD member told their partner, "Just set it somewhere. Give it to me, matter of fact" and took the bag in their left hand. BWC does not show what happened to the bag and the CPD members did not report finding the bag on the Investigatory Stop Report (ISR).¹⁰⁵ Further, despite BWC showing that both CPD members suspected the complainant was driving while intoxicated, they did not request a DUI officer to conduct a field sobriety test prior to releasing the complainant with a citation for the open alcohol bottle. *COPA did not recommend any retraining related to*

¹⁰³ 2020-0005367

¹⁰⁴ An affidavit override provides an investigating agency the authorization to complete a misconduct investigation without obtaining a sworn affidavit from the complainant on the basis of there being objective, verifiable evidence to support the allegations.

¹⁰⁵ At the time of this incident, an investigatory stop was defined by CPD as "a temporary detention and questioning of a person...based on Reasonable Articulate Suspicion that the person is committing, is about to commit, or has committed a criminal offense." Investigatory stops can lead to a search of a vehicle or a pat down of an individual if an officer has reasonable suspicion. After they have conducted an investigatory stop, CPD members were required to complete an Investigatory Stop Report. Chicago Police Department, "Special Order S04-13-09: Investigatory Stop System," effective July 10, 2017 through February 3, 2026.

this incident. Following its review of the BWC footage, OIG submitted a new complaint to investigate the CPD members for concealing the recovery of possible narcotics from a supervisor and not including this evidence in Department reports.¹⁰⁶

- According to BWC, a complainant was pulled over for not stopping at a stop sign and their passenger not wearing a seatbelt. The complainant and passenger were ordered out of the vehicle and the passenger was handcuffed at the rear of the car. A CPD member conducted a name search on both occupants, which came back clear, and told the complainant and passenger to have a good day. However, as shown on BWC, a different CPD member stated, “Hold on, you want to play this game” after searching the vehicle and discovering a large bag of what appeared to be cannabis on the passenger side floorboard. As BWC showed this CPD member holding the large bag in their hand and the passenger is shown being unhandcuffed, another CPD member states, “Green” and all CPD members simultaneously deactivated their BWCs. There were no ISRs or any other documentation filed for this incident.¹⁰⁷ This case was closed as a Non-Disciplinary Closure under Phase 2 and COPA’s closing comments note “only 4th amend issues and minor BWC and reporting issues.” *COPA did not recommend any retraining related to this incident.* OIG submitted a new complaint to COPA to address whether the suspected cannabis was inventoried.¹⁰⁸

2 | Widespread use of Non-Disciplinary Closures limits COPA’s efforts to hold CPD members accountable, enhance transparency, and build public trust.

Under the Timeliness Initiative, COPA chose to pursue Non-Disciplinary Closures despite many cases being in the final stages of investigation. In many investigations, COPA had already analyzed evidence and brought formal allegations against the accused members. OIG found that accused CPD members had been served with allegations in 199 cases (30.4% of all Timeliness Initiative cases) and a drafted summary report of the investigation was mentioned in at least 51 investigations closed under the Timeliness Initiative. This included investigations with notes indicating significant work had been completed years before the Timeliness Initiative review such as,

- “SRI [Summary Report of Investigation] submitted for review on 09JUN2021;”
- “Report has been in DC [Deputy Chief] review since Nov. 2021;” and
- “2/1/2022... Reviewed, approved and resubmitted Admin Close (using new form) to DC for final review, approval and closure to COPA/CMS.”¹⁰⁹

According to COPA’s initial TIP Guidance, the initiative was intended to target investigations “that will exceed the 18-month timeframe or have no reasonable certainty of concluding within 18 months.” In its own review of cases closed under the Timeliness Initiative, COPA noted, “We also found many instances of cases that were otherwise complete and had [report] drafts submitted but were stuck in one of the many stages of final review. We found extended delays at the Supervising Investigator, Legal, and Deputy Chief level.” When asked why cases that had drafted summary

¹⁰⁶ 2019-0002193. As a result of the new intake (BIA log 2024-0008250), the only CPD member still active from this investigation was given a Reprimand for failing to report contraband found during a vehicle search. That member is now assigned to Narcotics.

¹⁰⁷ 2022-0003089

¹⁰⁸ 2024-0007066 – As of May 6, 2026, this case is “Pending Investigation.”

¹⁰⁹ 2019-0000478; 2019-0002943; 2020-0003160

reports were not closed through normal pathways rather than under the Timeliness Initiative, a Supervising Investigator told OIG that just because there is a drafted summary report does not mean that the case is close to being completed as drafts often require a lot of editing. The Supervising Investigator stated that they did not have the bandwidth to spend days editing Final Summary Reports (FSRs) when they could be spending that time serving allegations or writing up material for a separation case, for example. The Supervising Investigator stated that these decisions were a “matter of resources.” A Director of Investigations similarly stated that “some of [the drafted reports] needed a lot of work” and COPA determined closing these cases with FSRs was “not an efficient use of our resources.”

The decision to not bring Timeliness Initiative cases to “investigative findings” also means that COPA did not provide individual report summaries, such as FSRs, for each case, which has ramifications for COPA’s transparency mandate. COPA’s website states, “At the conclusion of every COPA investigation, we produce a Final Summary Report detailing our analysis of the evidence gathered and a summary of our findings and recommendations.”¹¹⁰ According to COPA’s “Final Summary Report” policy, an FSR

is intended to serve as the written memorialization of COPA’s analysis of the evidence and investigative Findings. Written for the benefit of audiences both internal and external, COPA strives to produce FSRs that are thorough, yet concise, and easily comprehended by all stakeholders. Through the FSR, COPA outlines the allegations of misconduct against Department members, discusses and applies applicable legal rules, including any relevant Department rules and directives, discusses and analyzes the relevant evidence, explains the recommended disposition of each allegation (i.e., Sustained, Not Sustained, Unfounded, or Exonerated), and details any associated recommendations such as discipline or training.¹¹¹

COPA is required by Ordinance to publicly post all FSRs to their website for public inspection.¹¹² However—despite cases closed under the Timeliness Initiative including allegations COPA determined would have been sustained—because Non-Disciplinary Closure cases did not come to investigative findings, COPA was not required to complete or make available to the public an FSR nor any similar descriptive report of these individual investigations.

Separately, OIG found that COPA closed investigations under the Timeliness Initiative despite having already taken additional administrative steps to keep the investigation open based on the nature and viability of the allegations. Specifically, until July 2021, complainants were required to sign a sworn affidavit in order for an investigating agency to proceed with an investigation, with some exceptions. If the complainant did not wish to sign an affidavit, the investigating agency had the option of pursuing an override of the requirement, known as an “affidavit override.” According to COPA policy, an affidavit override is “[a]n action taken by the Chief Administrator of COPA or the Chief of the Department’s Bureau of Internal Affairs deeming that there exists sufficient Objective Verifiable Evidence such that the continued administrative investigation of the allegations of

¹¹⁰ Civilian Office of Police Accountability, “How to Read a Final Summary Report,” accessed September 3, 2025, <https://www.chicagocopa.org/investigations/how-to-read-a-case-summary-report/>.

¹¹¹ Civilian Office of Police Accountability, “Final Summary Report,” July 30, 2021, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/08/COPA-Policy_Final-Summary-Report_FINAL_2021-07-30.pdf.

¹¹² MCC 2-78-145.

misconduct is necessary and appropriate.”¹¹³ Despite COPA taking these additional steps to pursue accountability for an incident based on existing objective, verifiable evidence, OIG found at least three investigations in its review of cases closed under the Timeliness Initiative in which an affidavit override was sought and received but the investigations were ultimately closed as NDCs.

Finally, although CPD members may have avoided disciplinary repercussions resulting from cases closed under COPA’s Timeliness Initiative, the City and its taxpayers still bear a large financial burden for those members’ actions. As of September 2025, 34 civil suit settlements related to cases closed under the Timeliness Initiative have resulted in taxpayer payments of over \$2 million. Additionally, there are four more civil suits that are ongoing or have not yet been posted to the Department of Law’s website, meaning the full cost of these actions are not yet known.¹¹⁴

D | COPA’s open investigations have decreased overall since the Timeliness Initiative launched.

COPA has frequently stated that the goal of the Timeliness Initiative was to clear old investigations to allow the agency to timely investigate and close cases going forward. During a January 2024 Police Board meeting, COPA’s then-Chief Administrator stated, “I am an employee, I am an employer. I understand that when you’re trying to discipline or correct behavior, pointing that out three years after the fact doesn’t help a lot. So, we are setting ourselves as an agency on a path to be able to conclude all of these investigations within 18 months or less going forward.”¹¹⁵

As shown in Figure 21, according to COPA’s Monthly Case Closure reports which track all open investigations, COPA’s overall number of open cases has decreased since its Timeliness Initiative began.¹¹⁶

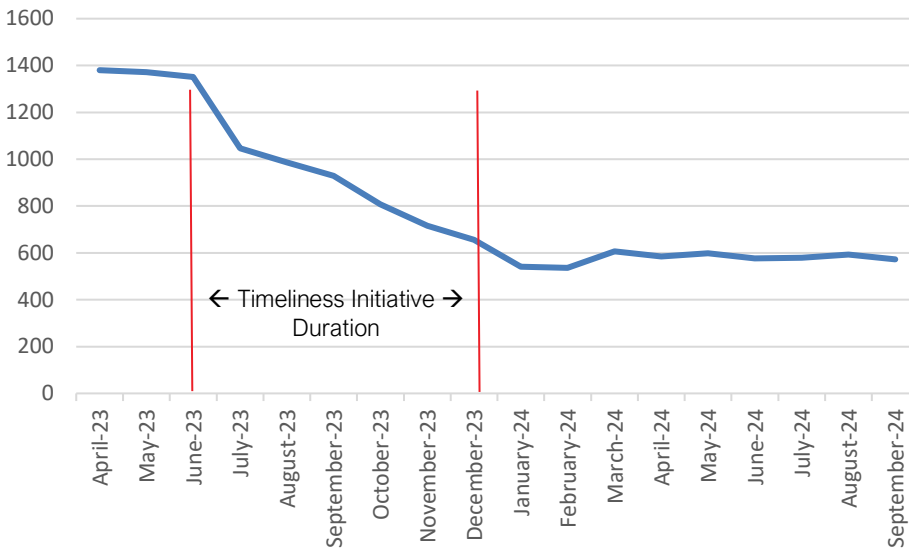
¹¹³ Civilian Office of Police Accountability, “Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement,” December 15, 2022, accessed October 15, 2025, <https://www.chicagocopa.org/wp-content/uploads/2023/01/COPA-Policy-Affidavits-FINAL-2022-12-15.pdf>.

¹¹⁴ City of Chicago Law Department, “Judgement and Settlement Payment Requests,” accessed September 4, 2025, https://www.chicago.gov/city/en/depts/dol/supp_info/judgment-and-settlement-payments-requests.html.

¹¹⁵ City of Chicago Police Board, “Public Meeting,” January 18, 2024, 25, accessed December 9, 2025, <https://www.chicago.gov/content/dam/city/depts/cpb/PubMtgMinutes/PubMtgTranscript01182024.pdf>.

¹¹⁶ While OIG observed that COPA’s open cases have decreased since the onset of the Timeliness Initiative, it did not undertake any analysis to determine the exact cause of this case reduction or the Timeliness Initiative’s specific contribution to this declination.

Figure 21: COPA Open Cases (April 2023 – September 2024)¹¹⁷



Source: OIG Visualization of COPA Monthly Case Closure Reports Data

Prior to the Timeliness Initiative, according to its “Q2 2023 Quarterly Report,” COPA reported 800 pending investigations open for 18 months or longer.¹¹⁸ In Q2 2024, following the conclusion of its Timeliness Initiative, COPA reported 56 pending investigations that were 18 months or older.¹¹⁹ As of its “Q2 2025 Quarterly Report,” COPA had 68 pending investigations over 18 months old.¹²⁰

COPA personnel told OIG that this caseload reduction has succeeded in creating a better investigative work environment. For example, a COPA Supervising Investigator stated that “being a supervisor before and after TIP is night and day,” and they now know every one of their cases and what step each investigation is on. The Supervising Investigator told OIG that since the completion of COPA’s Timeliness Initiative, they have met all of their deadlines, and the deadlines feel more manageable because they have fewer total investigations. The Supervising Investigator said, “I’m closing way more cases than I used to because I’m not drowning.” Additionally, they reported that this lighter workload allows for more supervisory work as they are now able to sit in on interviews to review their team’s performance. When asked how the Timeliness Initiative impacted their work, a COPA Director of Investigations similarly told OIG, “I can’t stress enough the benefits it’s had.”

Following the Timeliness Initiative, the Supervising Investigators on the review staff put together an internal “Case Review Trends” document with key takeaways and recommendations to address the root causes of delays and improve COPA’s investigations going forward. This document makes note that COPA has implemented “new practices to immediately reassign all cases assigned to departing investigators,” however, these new practices reportedly had not yet been incorporated

¹¹⁷ COPA began producing these internal monthly reports in April 2023 and provided them to OIG in October 2024. Each report reflects the case closures that occurred during the previous month. For example, the July 2023 report was created on August 8, 2023, and shows the number of cases closed during July.

¹¹⁸ Civilian Office of Police Accountability, “Q2 2023 Quarterly Report,” July 15, 2023, 19, accessed September 4, 2025, <https://www.chicagocopa.org/wp-content/uploads/2023/07/COPA-2023-Q2-Report-2.pdf>.

¹¹⁹ Civilian Office of Police Accountability, “Q2 2024 Quarterly Report,” July 15, 2024, 18, accessed September 4, 2025, <https://www.chicagocopa.org/wp-content/uploads/2024/07/COPA-2024-Q2-5.pdf>.

¹²⁰ Civilian Office of Police Accountability, “Q2 2025 Quarterly Report,” July 15, 2025, 16, accessed September 4, 2025, <https://www.chicagocopa.org/wp-content/uploads/2025/07/2025-Q2-Report-1.pdf>.

into official policy. Other suggestions include incorporating case closure numbers and quality of written work into performance reviews as well as developing guidance to clearly define supervisory roles and standards for review. A COPA Director of Investigations told OIG that the vast majority of recommendations made within the “Case Review Trends” document had already been implemented or there are plans to implement the changes in the future. OIG did not conduct any analyses to determine the implementation status of these changes as part of this review.

A Supervising Investigator told OIG, “Nobody likes the idea of shutting down these cases but the reality is that we have finite resources and a deadline that we didn’t pick or negotiate,” and stated that the FOP and City made the decisions that necessitated COPA’s Timeliness Initiative. Similarly, a COPA DOI stated that COPA “did this because we had no choice” and the Timeliness Initiative was a “one time solution to a problem we hope to never experience again.”

OIG recognizes that there are practical considerations, such as the appropriate allocation of finite resources, for closing aging investigations. However, as conceived and implemented, the Timeliness Initiative compromises COPA’s institutional purpose to investigate allegations of misconduct and puts the public’s confidence in effective police oversight at risk. This inquiry aims to shine light on areas of concern in efforts such as the Timeliness Initiative as COPA aims “to be the leader in police accountability” and has already engaged with other entities regarding establishing their own timeliness initiatives.¹²¹ COPA and BIA leadership also confirmed that they have had discussions regarding how BIA might implement its own timeliness initiative. As of February 2025, BIA indicated that it had not yet moved forward in these efforts.

¹²¹ According to the TIP Special Report, “COPA provided technical assistance to Detroit’s civilian oversight entity, the Office of the Chief Investigator of the Detroit Board of Police Commissioners, on its own timeliness initiative in 2024.” Civilian Office of Police Accountability, “COPA Timeliness Initiative Project,” 10.

Finding 2: COPA did not consider members' complaint histories when creating eligibility parameters for Timeliness Initiative closures. Further, these Non-Disciplinary Closures preclude COPA from utilizing known patterns of concerning behaviors to inform future disciplinary decisions.

According to its establishing ordinance, COPA has the duty, “subject to applicable law, to review the complaint history of a member of the Police Department in order to inform a current investigation.”¹²² Similarly, COPA’s “Disciplinary and Remedial Recommendations” policy lists “the Department member’s position, complimentary history, and disciplinary history” under “Factors to be Considered when Determining an Appropriate Disciplinary or Remedial Action.”¹²³ This policy states, “As applicable, COPA will consider a Department member’s behavior based on available training records and disciplinary history, including complaints in which allegations were not sustained, as permitted by law and any applicable collective bargaining agreements. Prior not-sustained allegations, when considered in the aggregate, may identify a pattern and can provide insight on investigations.”¹²⁴ Despite these provisions, the eligibility parameters COPA chose for its Timeliness Initiative fail to broadly consider a member’s disciplinary history as permitted by law and the applicable sworn member collective bargaining agreements and rather narrowly focus on the nature of the allegations within each individual investigation.

A COPA Director of Investigations (DOI) involved in establishing the eligibility guidelines for the Timeliness Initiative told OIG that members’ disciplinary history was not considered as a potential disqualifying parameter. The DOI reported this decision “c[ame] down to the process” of accessing a member’s disciplinary history. The DOI stated that for COPA to officially consider a member’s disciplinary history as part of an investigation, they must first obtain a member’s formal disciplinary history from BIA. COPA cannot do so until they have sustained an allegation for the investigation within CMS. The DOI reported that since most Timeliness Initiative cases were not at a phase in which investigators had sustained violations, COPA would have been unable to request an accused member’s disciplinary history from BIA for consideration in the Timeliness Initiative closure parameters.

OIG found that COPA was not actually precluded from considering previous disciplinary findings when determining eligibility for the Timeliness Initiative. Per COPA’s internal “Training and

¹²² MCC 2-78-120(k).

¹²³ Civilian Office of Police Accountability, “Disciplinary and Remedial Recommendations,” June 24, 2021, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/07/COPA-Policy_Disciplinary-and-Remedial_FINAL_2021-06-24.pdf.

¹²⁴ Civilian Office of Police Accountability, “Disciplinary and Remedial Recommendations.”

Disciplinary Records” policy, disciplinary records, “an informal review of a Department member’s records,” are distinguishable from disciplinary history, “a formal request, fulfilled by the Department, for a Department member’s complete and official disciplinary history.” This policy states that, “Assigned COPA investigative staff will request training and disciplinary records for involved/accused members *at the time a case is initially assigned to an investigative squad* (emphasis added).” Further, COPA’s “Fact Gathering and Investigative Process” policy requires the investigative team to “determine whether there are any other open administrative investigations involving the same involved member, and monitor or combine the investigation(s), as appropriate.”¹²⁵ Therefore, while COPA may not have been well positioned to obtain a member’s official disciplinary history from BIA when considering closing investigations under the Timeliness Initiative, COPA’s own policies advise investigative teams to informally review and monitor disciplinary records throughout an investigation.

In fact, COPA has previously used CPD members’ disciplinary records as a disqualifying parameter for similar efforts. As reported in OIG’s September 2020 “Advisory Concerning the Civilian Office of Police Accountability’s Practice of Administratively Terminating Disciplinary Investigations,” when developing eligibility criteria, “COPA further explained that an accused member’s entire complaint history, not just sustained complaints, would be accounted for when considering whether or not to administratively terminate an investigation. Reportedly, an investigation involving a member whose complaint history included ‘three, four, five’ similar complaints would not be eligible for administrative termination.”¹²⁶ By the same token, COPA’s policy addressing its Community Mediation Program states, “Generally, a complaint is not eligible for mediation if the accused CPD [member] has had two or more prior complaints with similar allegations within the last 12 months.”¹²⁷ Accordingly, COPA has and will consider CPD members’ disciplinary records outside of the Timeliness Initiative.

OIG found that 269 CPD members were accused in multiple investigations closed under COPA’s Timeliness Initiative, as depicted below in Figure 22. This includes 18 CPD members with 5 or more Non-Disciplinary Closures. These numbers reflect cases closed under the Timeliness Initiative only and do not reflect any additional cases the members may have accrued which were not eligible to be completed under the initiative. When asked how, if at all, COPA accounted for patterns of CPD members with multiple investigations closed as NDCs, a COPA DOI stated that they could think of two people where they “drew the line” of not closing any more cases under the Timeliness Initiative. The DOI reported that this decision was based on the sheer number of cases the member had accrued.

¹²⁵ Civilian Office of Police Accountability, “Fact Gathering & Investigative Process,” November 1, 2021, 5, accessed September 4, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/11/COPA-Policy_Fact-Gathering_FINAL_2021-11-01.pdf.

¹²⁶ City of Chicago Office of Inspector General, “OIG Advisory Concerning COPA’s Practice of Administratively Terminating Disciplinary Investigations,” September 2020, 11, accessed September 3, 2025, <https://iqchicago.org/wp-content/uploads/2023/08/OIG-Advisory-Concerning-COPAs-Practice-of-Administratively-Terminating-Disciplinary-Investigations.pdf>.

¹²⁷ The community-police mediation program is intended to “increase efficiency, transparency, and public trust by using procedural and restorative justice-framed processes within the City’s complaint resolution process.” Civilian Office of Police Accountability, “COPA Community-Police Mediation Policy,” October 23, 2025, 4, accessed December 2, 2025, https://www.chicagocopa.org/wp-content/uploads/2025/04/2025-04-16-Mediation-Policy_DRAFT.pdf.

Figure 22: Members with Multiple Investigations Closed Under the Timeliness Initiative

Number of Cases Closed Under the Timeliness Initiative	Number of Accused Department Members
2	166
3	57
4	28
5	6
6	9
7	1
11	1
12	1

Source: OIG analysis

To understand the full disciplinary history of the aforementioned 18 members with five or more Non-Disciplinary Closures, OIG reviewed all investigations in which these members had ever been accused of misconduct. OIG found that as of the start of COPA’s Timeliness Initiative in July 2023, these 18 members had accumulated over 600 allegations of misconduct throughout their careers, with one member receiving 135 individual allegations.¹²⁸ By the start of the Timeliness Initiative, 58 of the total allegations had been sustained across 25 individual investigations, with recommended discipline for members ranging from Violation Noted to 60-day suspensions.

The consent decree and COPA policy dictate that most sustained findings can only be considered for future disciplinary decisions (known as “progressive discipline”) for a period of five years after an incident occurs.¹²⁹ Figure 23 shows sustained allegations within investigations which were closed within the 5-year time limit and legally could have weighed into COPA’s disciplinary decisions at the time of the initiative. These sustained allegations are included to illustrate patterns of misconduct COPA could have considered when reviewing Timeliness Initiative eligibility and are important to include within a disciplinary system that operates on progressive discipline.

Figure 23: Investigations Closed as of July 18, 2023, with Sustained Allegations within the Last Five Years¹³⁰

Accused Name	Log Number	Sustained Allegations	Recommended Discipline
Roger Farias	2019-0004592	Operation/Personnel Violations Failed to submit ISR	1-day Suspension
		Operation/Personnel Violations Neglect of Duty No Receipt	
	2019-1092455	Operation/Personnel Violations/Conduct unbecoming	3-day Suspension
		Civil Rights Violation/Improper Search/Person	

¹²⁸ These 607 allegations encompass only investigations which were closed at the start of the Timeliness Initiative.

¹²⁹ Consent decree, ¶ 516.

¹³⁰ This table is not exhaustive. As a matter of succinctness, OIG chose to include only members with multiple closed investigations falling within the 5-year time limit.

		Operation/Personnel Violations/Conduct unbecoming	
		Operation/Personnel Violations/Reports/Fail to submit - No ISR	
		Operation/Personnel Violations/Reports	
		Operation/Personnel Violations/Neglect of duty (ICC)	
	2021-0004491	Civil Rights Violation Improper Search /Person/protective pat down	10-day Suspension
		Operation/Personnel Violations/Reports/Fail to submit - No ISR	
		Conduct Unbecoming Violations/Unprofessionalism	
		Conduct Unbecoming Violations/Abuse of authority	
	2022-0000314	Arrest/Lockup Incidents/Property/Failed to inventory	1-day Suspension
Enrique Delgado Fernandez	2019-0001719	Excessive Force/Unnecessary Physical Contact/No injury	10-day Suspension
		Arrest/Lockup Incidents/Bonding/Booking/Processing *Fail to follow G.O.'s	
		Operation/Personnel Violations/Reports/Improper TRR	
		Arrest/Lockup Incidents/Arrest, Improper, Procedures *Fail to follow G.O.'s	
		Arrest/Lockup Incidents/Arrest, Improper, Procedures *Fail to follow G.O.'s	
	2019-0002776	Operation/Personnel Violations/Reports/Fail to Submit/ISR	60-day Suspension
		Operation/Personnel Violations/Reports/Fail to Submit/TSS	
		Coercion/Threat of Non-Criminal Government Enforcement/ Coerced Cooperation	

Kevin Popp	2020-0000947	Operation/Personnel Violations - Reports - Fail to Submit (10T)	5-day Suspension
		Operation/Personnel Violations - Reports - Fail to Submit (10T)	
		Operation/Personnel Violations - Failure to Identify (10AA)	
	2021-0000475	Alcohol/Drug Abuse - D.U.I - Accidental - No Injury (02C)	35-day suspension, completion of an alcohol treatment program, and enhanced random alcohol and drug testing

Source: OIG Analysis

Critically, while COPA’s Timeliness Initiative was underway (July 2023 – January 2024), 12 of the same 18 accused members with 5 or more Non-Disciplinary Closures were involved in an additional 17 investigations with allegations serious enough that COPA did not close them under the Timeliness Initiative and instead brought the investigations to disciplinary findings. For example, during this time period, COPA sustained allegations in 5 separate investigations against Officer Roger Farias, who had 12 investigations closed under the Timeliness Initiative. In three of these investigations, COPA sustained allegations of excessive force with 3-day, 15-day, and 30-day suspensions recommended, respectively. In a fourth investigation, COPA recommended a 3-day suspension for Officer Farias’ failure to notify OEMC of pointing their firearm.¹³¹ And, in January 2024, COPA recommended that Officer Farias be separated for sustained allegations related to abuse of authority and violations of Rule 14, which prohibits making false reports.¹³² Despite these 5 investigations occurring during the same time period, COPA still closed 12 other investigations involving Officer Farias as NDCs. COPA made training recommendations related to 7 of the 12 Timeliness Initiative closures, indicating there was a “strong likelihood” allegations would have been sustained in another 7 investigations. While COPA’s aforementioned policy requires the investigative team to “determine whether there are any other open administrative investigations involving the same involved member, and monitor or combine the investigation(s), as appropriate,” COPA appears to have closed multiple cases under the Timeliness Initiative without considering Officer Farias’ other misconduct cases under its own investigative jurisdiction.

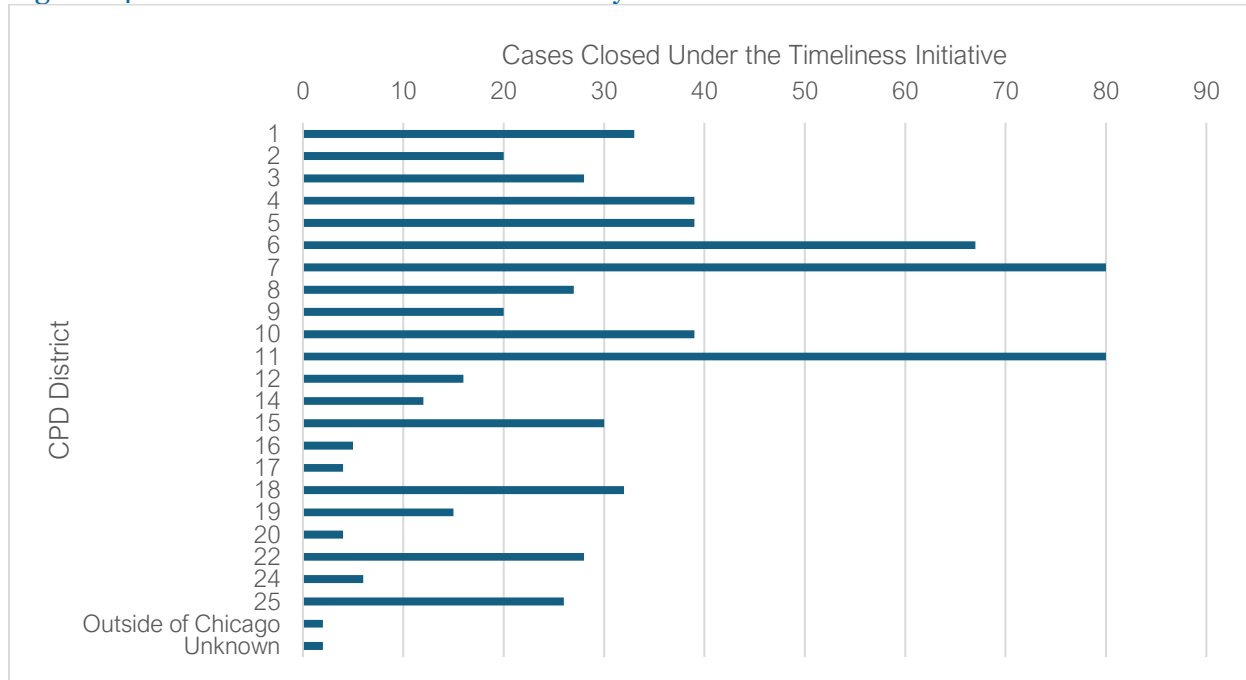
¹³¹ Through the grievance process, this violation was ultimately expunged from Officer Farias’ disciplinary record.

¹³² See City of Chicago Office of Inspector General, “Enforcement of the Chicago Police Department’s Rule Against False Reports,” May 25, 2023, accessed September 4, 2025, <https://igchicago.org/wp-content/uploads/2023/05/Enforcement-of-CPDs-Rule-Against-False-Reports-%E2%80%93-Rule-14.pdf>.

According to the Chicago Sun-Times, after receiving pushback from Superintendent Snelling, “COPA effectively dropped the case without imposing discipline.” Tom Schuba and Anna Savchenko, “New Chicago police oversight boss has been wiping out recommendations to fire cops,” *Chicago Sun-Times*, August 22, 2025, accessed September 3, 2025, <https://chicago.suntimes.com/the-watchdogs/2025/08/22/lakenya-white-civilian-office-police-accountability-chicago-police-department-kersten-snelling>.

By choosing to close Timeliness Initiative cases on an allegation-by-allegation basis, COPA may have missed addressing patterns of misconduct at the individual or CPD District level. For example, as reported by WTTW Chicago, following the March 2024 shooting of Dexter Reed by members of the 11th District Tactical Team, COPA sent a letter to CPD “to inform [the Department] of a pattern of problems we have discovered with the documentation of CPD/citizen encounters in the 11th District...Over the past several months, COPA has received numerous complaints related to CPD members detaining, searching, and/or subjecting citizens to force. COPA’s investigation of these complaints has been impeded by a consistent lack of documentation, Body Worn Camera (BWC) footage, and accurate recordkeeping.”¹³³ While COPA acknowledged a pattern of misconduct in the 11th District, OIG found that under its Timeliness Initiative COPA closed 80 individual cases occurring in District 11, as shown in Figure 24 below. These 11th District NDC cases involved 141 known individual CPD members and resulted in a total of 125 training recommendations, including 95 recommendations for BWC or form reporting training. Despite being able to consider not sustained allegations in a pattern and practice analysis, none of the investigations closed under the Timeliness Initiative—which involved the same type of identified issues—were referenced in COPA’s letter to the Department. Further, as this District was identified by COPA as having a pattern of concerning behavior, it is particularly important for COPA to reach disciplinary findings to ensure these patterns are accurately reflected in the accused members’ future disciplinary actions.

Figure 24: Timeliness Initiative Cases Closed by CPD District



Source: OIG analysis

Separately, OIG’s analysis showed that under the Timeliness Initiative, COPA recommended members receive use of force or de-escalation training a total of 78 times, including three members

¹³³ Heather Cherone, “Police Misconduct Agency Identified Troubling Pattern of Stops in 11th District Months Before Fatal Dexter Reed Shooting, Letter Shows,” *WTTW Chicago*, October 23, 2024, accessed September 4, 2025, <https://news.wttw.com/2024/10/23/police-misconduct-agency-identified-troubling-pattern-stops-11th-district-months-fatal>.

who were recommended for these trainings across multiple investigations. According to its website, “COPA has the authority to make a wide range of disciplinary recommendations, and the severity of its recommendations is commensurate with the type of allegation COPA sustains during an investigation. For less severe infractions, COPA can recommend alternatives to formal discipline such as requesting the accused member be retrained.”¹³⁴ While training may be an appropriate course of action for “less severe infractions,” repeated violations of use of force policies or the failure to utilize de-escalation tactics when interacting with members of the public raise concerns about COPA’s chosen course of remedial action. By not reaching findings in these investigations, this misconduct—which COPA has stated likely would have been sustained—cannot be used towards progressive discipline or saved in employment records. Changes within the new FOP CBA specifically call out that “[n]on-sustained files shall not be used in determining promotions or in making assignments.” That is, while COPA may use these investigations to conduct a pattern or practice analysis, these NDC cases cannot be considered when determining future discipline for similar misconduct or whether a member should be promoted within the Department.

¹³⁴ Civilian Office of Police Accountability, “Timeliness FAQs,” accessed September 3, 2025. As of January 2026, this webpage is no longer available on COPA’s website.

Finding 3: In lieu of discipline, under its Timeliness Initiative COPA made over 700 training recommendations to address CPD members' alleged misconduct. However, COPA did not ensure the responsive training was implemented by CPD.

COPA's establishing ordinance empowers its Chief Administrator to recommend "other remedial action against members of the Police Department found to be in violation of any applicable Police Department rules."¹³⁵ COPA policy includes recommendations for training as potential non-disciplinary actions which may be recommended in lieu of, or in addition to, discipline.¹³⁶ As it relates to its Timeliness Initiative, COPA reported that—through the initiative—it "will expedite and conclude eligible misconduct complaints by requesting additional training for Chicago Police Department (CPD) members or through other remedial recommendations if allegations are sustained."¹³⁷ While COPA's public appeals for endorsement of the Timeliness Initiative rested largely on training recommendations being the best and most appropriate outcome of these investigations, OIG found that COPA's ensuing training recommendations were not reviewed by CPD until almost two years after the initiative concluded.

A | Training Recommendations

Within the TIP Guidance and confirmed in interviews with COPA leadership, under the Timeliness Initiative, COPA made training recommendations for allegations which likely would have been sustained in normal investigative circumstances. In December 2024, COPA published a TIP Special Report on its website intended to summarize "the necessities, implementation of, and city-wide impact of COPA's Timeliness Initiative Project (TIP) in 2023."¹³⁸ According to this report,

COPA made a total of 725 retraining recommendations for 425 different CPD members. They included 312 recommendations for retraining regarding CPD's body worn camera (BWC) policy, 211 recommendations regarding CPD's investigatory stop report (ISR) policy, 69 recommendations regarding CPD's use of force policy, 61 recommendations regarding

¹³⁵ MCC 2-78-120(l).

¹³⁶ Civilian Office of Police Accountability, "Disciplinary and Remedial Recommendations," June 24, 2021, accessed September 3, 2025, https://www.chicagocopa.org/wp-content/uploads/2021/07/COPA-Policy_Disciplinary-and-Remedial_FINAL_2021-06-24.pdf.

¹³⁷ Civilian Office of Police Accountability, "Timeliness FAQs," accessed September 3, 2025. As of January 2026, this webpage is no longer available on COPA's website.

¹³⁸ Civilian Office of Police Accountability, "COPA Timeliness Initiative Project," December 2024, 11, accessed September 3, 2025, <https://www.chicagocopa.org/wp-content/uploads/2024/12/Special-Report-Timeliness-FINAL-12.9.24.pdf>.

the protections afforded by the Fourth Amendment,¹³⁹ 26 recommendations regarding CPD’s professionalism policies, 16 recommendations regarding CPD’s tactical response report (TRR) policy, nine recommendations regarding CPD’s supervisory responsibilities policy, six recommendations regarding the obligation to report misconduct, and 15 miscellaneous recommendations.¹⁴⁰

Across multiple forums, COPA has publicly stated and published different final counts of Non-Disciplinary Closures under its Timeliness Initiative. Thus, as part of this inquiry, OIG conducted its own analysis of all cases closed under COPA’s Timeliness Initiative based on data collection completed by its Investigative Analysis Unit during its review of closed misconduct investigations. Overall, OIG found that COPA made a total of 742 training recommendations as remedial actions resulting from Non-Disciplinary Closures under the initiative.

Figure 25: OIG Analysis of Training Recommendations Made by COPA

Training Type	Total Recommendations
BWC Policy	310
Form Reporting (ISR/TRR)	236
Use of Force (Taser/Firearm Pointing/Baton)	41
Vehicle Searches	39
De-escalation	37
Other ¹⁴¹	28
Professionalism	28
Fourth Amendment Violations	14
Supervisory Responsibilities	9

Source: OIG analysis.

As shown, most training recommendations were made to address issues with members’ body worn camera usage or documentation practices, despite most cases being categorized as Excessive Force or Civil Rights issues.¹⁴² At a June 2023 CCPSA meeting, COPA’s then-Chief Administrator stated, “A number of these cases, the original complaint may come in as a Fourth Amendment case or something of that nature. But a lot of times those original citizen complaints are not sustained; we don’t have significant substantial evidence in order to sustain those cases. But in the review of the body worn camera or other evidence, as we are obligated to do under the consent decree, we end up bringing other ancillary operational violations.”¹⁴³ A COPA Supervising Investigator reported that many cases alleging 4th Amendment violations for improper searches conducted during traffic stops had been repeatedly “put on the backburner” by COPA because they are difficult to sustain. Many of these “backburner” cases thus ended up being closed under the Timeliness Initiative due to their age.

¹³⁹ According to the TIP Special Report, “Within this category, COPA made 42 retraining recommendations regarding vehicle searches, 7 recommendations regarding the search of persons, 4 recommendations regarding the probable cause to arrest, 4 recommendations regarding the reasonable articulable suspicion to detain, and 4 recommendations related to the securing of arrestee property.” Civilian Office of Police Accountability, “COPA Timeliness Initiative Project.”

¹⁴⁰ Civilian Office of Police Accountability, “COPA Timeliness Initiative Project,” 11.

¹⁴¹ Examples of “Other” recommendations include training regarding lockup incidents, failure to intervene, failure to report officer misconduct, and failure to secure vehicle.

¹⁴² See Figure 9.

¹⁴³ Community Commission for Public Safety and Accountability, “Public Meeting,” June 29, 2023, 1:31:50, accessed September 3, 2025, <https://www.youtube.com/watch?v=9DZDwpyNC8I>.

Overall, OIG found that 288 of 654 cases closed under COPA's Timeliness Initiative had some kind of training recommended – meaning that in 44% of all cases closed there was a “strong likelihood” that COPA would have sustained allegations of misconduct for accused CPD members under normal investigative circumstances.

B | Implementation of Training Recommendations

COPA's July 2023 TIP Guidance states that “Members of the Review Staff and COPA Senior Management are actively engaged in discussions with CPD as to how [to] best document and transmit training recommendations to the CPD.” This process was expected to be finalized by the end of 2023. In May 2024, COPA leadership reported that they were initially planning to communicate recommendations to CPD on an ongoing basis as the review staff closed investigations but instead decided to provide CPD with a final list of all training recommendations at the end of the Timeliness Initiative review.

This decision was reflected in a January 2024 letter sent from COPA to CPD's then-BIA Chief regarding the final list of training recommendations resulting from Timeliness Initiative case closures. The letter acknowledged that CPD initially planned to develop a “comprehensive training dashboard,” which would have allowed COPA access to view a member's training records and upcoming training schedule. This dashboard was intended to give COPA the ability to check to see if the member had already received the recommended training since the incident had occurred. For example, if an incident happened in 2020 and, as part of the Timeliness Initiative, COPA wanted to recommend BWC training for the member in 2023, the proposed training portal would allow COPA to see if the accused member had already received BWC training in the intervening years. COPA leadership reported that they decided not to delay their own Timeliness Initiative process by waiting for the envisioned CPD dashboard to be completed. Therefore, COPA sent the aforementioned January 2024 letter to BIA along with a spreadsheet of all training recommendations resulting from Non-Disciplinary Closures under its Timeliness Initiative. The training list provided included the relevant log number, employee name, employee number, training recommendation, and the basis for that recommendation.

In its review of the COPA training spreadsheet, OIG found the list included several members recommended for duplicate trainings across multiple log numbers, as well as several data errors. For example, COPA's spreadsheet includes eight training recommendations for a single CPD member across five investigations, with four recommendations aimed at the BWC policy and another four recommendations for training on CPD's ISR policy. COPA's list also includes training recommendations for 11 members who were no longer with the Department by the time the list was sent to BIA. In fact, 10 of the 11 members were no longer with CPD when COPA initiated the Timeliness Initiative.¹⁴⁴ By including redundant or irrelevant training recommendations, COPA decreases its own credibility while also making it more cumbersome for CPD to efficiently implement the recommended training. OIG additionally found that the training spreadsheet contains multiple employee number errors and typos. Any errors within this spreadsheet risk CPD misidentifying or not identifying members who were recommended for training under this initiative.

¹⁴⁴ According to COPA documentation, the Timeliness Initiative Project effective date is July 17, 2023. One CPD member passed away on July 19, 2023. COPA included this member as well as ten others who left the Department between 2021 and 2023 in its training recommendations sent to BIA in January 2024.

Further, COPA's January 2024 letter to BIA contains language which gives the impression that this training list may not be final. The letter states that if a training dashboard is completed, "COPA will conduct a review of the attached list of non-disciplinary training recommendations and adjust the list accordingly, accounting for any applicable completed or scheduled training."¹⁴⁵ Of greater concern, in May 2024, when asked if CPD had implemented COPA's training recommendations, COPA's then-Deputy Chief Administrator told OIG, "We do not know," and stated that COPA had not followed up on the training recommendations it sent to BIA.

In November 2024, a COPA Director of Investigations reported to OIG that in a monthly call "earlier this year," the then-BIA Chief told COPA that the Department had gone through the training recommendations and was in the process of implementing the training. However, OIG was repeatedly unable to confirm with CPD that any of the recommended trainings had taken place. In January 2025, OIG spoke with the Sergeant in CPD's Training and Support Group (TSG) who is in charge of handling all referrals for training from BIA, COPA, and the Department's Tactical Review and Evaluation Division. The Sergeant was unfamiliar with COPA's Timeliness Initiative and stated they had never received a long list of training recommendations such as the one COPA sent to BIA. The TSG Sergeant stated that all training referrals they receive are tracked in an Excel spreadsheet, which includes the CPD member name and the log number that elicited the training recommendation. OIG reviewed the TSG training spreadsheet in February 2025 and found that none of the training recommendations stemming from log numbers closed under COPA's Timeliness Initiative were included. Between February and April 2025, OIG conducted additional interviews with current and former BIA leadership, one of whom COPA personnel referred to as their BIA point of contact for this initiative. BIA leadership had a limited understanding of COPA's Timeliness Initiative and at that time could not confirm any of the recommended training took place.

Additionally, COPA issued a letter in January 2025 regarding CPD's 2026 Training Plan which referred to training recommendations made under the Timeliness Initiative. In this report, COPA urged CPD to "[r]eview COPA's recommendations for CPD member retraining for non-disciplinary case closures in the Timeliness Initiative Project (TIP) Report," suggesting that COPA was aware CPD had not implemented any of its training recommendations at that point.¹⁴⁶ Even if COPA had ensured the training recommendations were followed, OIG's review indicates there were data quality concerns within these recommendations that may have led to superfluous or inaccurate training recommendations.

In support of its Timeliness Initiative, which concluded in January 2024, COPA repeatedly justified closing cases as NDCs by contending that CPD member misconduct would be addressed through training. As such, COPA should have been rigorous in ensuring its training recommendations were thorough and fully implemented. In November 2025, in response to OIG's request and nearly two years after the Timeliness Initiative concluded, CPD completed its review and facilitation of COPA's training recommendations. CPD provided OIG with a spreadsheet outlining the corresponding training for each recommendation and the date on which the accused CPD member completed the applicable training course. COPA reported that this initiative and its subsequent training

¹⁴⁵ If the affected Department member completed the relevant training since the date of the incident giving rise to the investigation, or is already scheduled to do so, COPA may retract the training recommendation.

¹⁴⁶ Civilian Office of Police Accountability, "COPA Feedback on the Needs Assessment for CPD 2026 Training Plan," January 15, 2025, 1, accessed September 5, 2025, <https://www.chicagocopa.org/wp-content/uploads/2025/03/COMBINED-COPA-Feedback-on-2026-CPD-Needs-Assessment-for-Training-Plan-redacted.pdf>.

recommendations were intended to “expedite and conclude” misconduct investigations. However, of the 725 training recommendations COPA made to CPD, responsive training for 268 (37.0%) recommendations were not completed until 2025. This includes several instances in which the recommended training did not occur until six years after the instigating event.¹⁴⁷

C | COPA’s Future Use of Non-Disciplinary Closures and Training Recommendations

While COPA has continually referred to its Timeliness Initiative as a one-time effort, the push to continue utilizing training recommendations in lieu of discipline appears to be part of COPA’s ongoing case management strategy. For example, COPA’s TIP Phase 2 Guidance states “COPA has and will initiate several corrective actions to ensure that agency-wide TIPs will no longer be necessary: revision and enforcement of clear investigative time benchmarks; providing accountability for investigators via case status meetings and performance evaluations; *expanded use of non-disciplinary and training recommendations*; community-driven mediation referrals; accountability agreements; and non-FSR closures for less severe instances of misconduct, where appropriate (emphasis added).” Similarly, an expanded use of training recommendations was included in CCPSA’s 2024 Goals for the COPA Chief Administrator:

- Continuing development of programs that expedite the resolution of COPA complaints while serving the interests of all stakeholders (i.e., complainant, victims, witnesses, CPD members, and external law enforcement and prosecutorial agencies)...**Benchmark:** Collaborate with external stakeholders (e.g. CPD, the police unions, and community) to create alternative resolutions (e.g. Accountability Agreements and Training Recommendations) for less severe complaints by Q4.¹⁴⁸

As shown within this inquiry, COPA has struggled to properly identify “less severe complaints” which might be appropriate to complete with training recommendations or non-disciplinary actions. Additionally, as recently as January 2025, COPA recommended that CPD “complete the internal dashboard of CPD member training history and share it with COPA so that COPA can make non-disciplinary training recommendations in a comprehensive, informed way and any gaps or delays in CPD member training can be identified.”¹⁴⁹ This recommendation suggests that CPD has not set up the infrastructure necessary for COPA to continue making non-disciplinary training recommendations in a “comprehensive, informed way.” COPA should therefore evaluate if it is appropriately positioned to expand the use of non-disciplinary recommendations as a case management strategy going forward.

¹⁴⁷ At that time, there were eight members whose recommended training was still “pending.” In March 2026, CPD notified OIG that those eight members had completed their recommended training.

¹⁴⁸ Community Commission for Public Safety and Accountability, “2024 Goals and Expectations for the Chief Administrator of COPA,” February 6, 2024, 3, accessed September 5, 2025, <https://www.chicago.gov/content/dam/city/depts/ccpsa/GOALS/COPA%20CCPSA%20Goals%202024%20-%20FINAL.pdf>.

¹⁴⁹ Civilian Office of Police Accountability, “COPA Feedback on the Needs Assessment for CPD 2026 Training Plan,” 2.

V | Conclusion

OIG recognizes that investigative backlogs may occur, whether due to staff turnover, inefficient case management practices, renegotiated labor union contracts, or spikes in investigations brought on by periods of civil unrest. COPA's Timeliness Initiative aimed to address this backlog by closing over 600 aging investigations in order to better position the agency to conduct timely misconduct investigations going forward. However, as shown within this inquiry, COPA failed to adhere to its own guidance and public comments made to validate and promote this initiative. This misalignment runs in direct contrast to COPA's stated vision "to be the leader in police accountability...and build public trust in civilian oversight." COPA's use of NDCs for serious misconduct not only precludes accountability for individual CPD members but also hinders COPA's own transparency efforts and puts public confidence in COPA's ability to effectively investigate police misconduct allegations at risk.

While COPA has indicated this initiative was a "one-time" effort, there are indications that COPA will continue to utilize NDCs and training recommendations for its case management efforts going forward. As such, OIG encourages COPA to invest in efforts to appropriately identify "low level" infractions that may be suitable for training recommendations. Further, to ensure the desired accountability measures are achieved, OIG urges COPA to pursue timely confirmation that any non-disciplinary recommendations made to CPD are appropriately implemented.

As demonstrated in this report, there are significant risks to initiatives such as COPA's Timeliness Initiative, and other agencies considering the use of similar efforts within their own work should take care to fully weigh the impact that sweeping administrative closures, even when done well, may have on police reform and accountability efforts.

Appendix A | COPA Response



June 12, 2026

Tobara Richardson
Deputy Inspector General for Public Safety
Office of Inspector General
740 North Sedgwick Street, Suite 200
Chicago, Illinois 60654

Via Electronic Mail

Re: Review of the Civilian Office of Police Accountability's Timeliness Initiative

Dear Deputy Inspector General Richardson:

In July 2023, COPA faced a difficult choice. Through a confluence of factors largely beyond its control, its caseload had ballooned to an unsustainable level, resulting in investigations lasting several years. Consequently, COPA's findings and disciplinary recommendations were routinely and significantly reduced or rejected entirely in arbitration. On top of that, COPA learned that the collective bargaining agreement covering police officers would be modified to impose an 18-month investigative time limit. COPA therefore determined that the best path forward was to reduce its caseload through a targeted and systematic review of its cases through the timeliness initiative.

From the beginning of its timeliness initiative, COPA has been upfront about the need for the initiative and its purpose. COPA has also been clear that the initiative was a one-time endeavor. Critically, and as OIG's report notes, the initiative successfully resulted in smaller caseloads, which will lead to more meaningful case outcomes going forward.

COPA believes it is important that OIG's report be read in conjunction with COPA's own report on the timeliness initiative to fully understand the circumstances necessitating the process and its impact. A copy of that report is attached to this letter.

As always, we appreciate OIG's continued review of COPA's work. Thank you for the opportunity to provide this response.

[Remainder of page left intentionally blank]

Respectfully,

A handwritten signature in blue ink, appearing to read "LaKenya White".

LaKenya White
Chief Administrator
Civilian Office of Police Accountability

cc: David Glockner (OIG)
Samuel Chae (OIG)
LaDonna Candia-Flanagan (OIG)
Timothy Moore (CPD)
Angie Snell (COPA)

Copy of COPA's Timeliness Report



COPA TIMELINESS INITIATIVE PROJECT

December 2024

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I. INTRODUCTION

This Report summarizes the necessities, implementation of, and city-wide impact of COPA's Timeliness Initiative Project (TIP) in 2023.

Large caseloads and aging investigations have consistently plagued Chicago's police accountability system. Through various efforts, COPA began significantly decreasing open investigations in 2022. However, by 2023, it was clear that even more decisive action was needed. COPA anticipated a new time limit provision in the successor collective bargaining agreement (CBA) with the Fraternal Order of Police, Lodge #7 (FOP). COPA's legacy case backlog was also revealing inherent flaws at the back end of the accountability process. Cases involving longer investigative timelines generally led to much reduced or eliminated discipline outcomes in arbitration.

Increased timeliness also serves Chicago Police Department (CPD) members by providing quicker resolutions to pending investigations. The Consent Decree also contains explicit investigative timeliness requirements placed upon COPA and CPD.¹ In light of these exigencies, COPA implemented the TIP as a necessary one-time process to address its legacy caseload.

Beginning in July 2023, assigned senior staff began reviewing open investigations which were over 18 months old to assess their viability at the Chicago Police Board or arbitration. Eligible cases were closed with a non-disciplinary closure memorandum and, where appropriate, recommended retraining for the involved CPD member(s). This early review effort provided a critical head start in reducing this backlog when the new FOP agreement was finally ratified on December 14, 2023, which instituted an 18-month timeline for all investigations. Had COPA not instituted its TIP when it did, it would not have had the resources to complete many of its major cases when the timeliness provision of the FOP contract went into effect in late January of 2024. These cases – many of them involving serious potential misconduct – would have been jeopardized, and COPA would have expended critical investigative resources with little chance of meaningful accountability before an arbitrator.

II. BACKGROUND

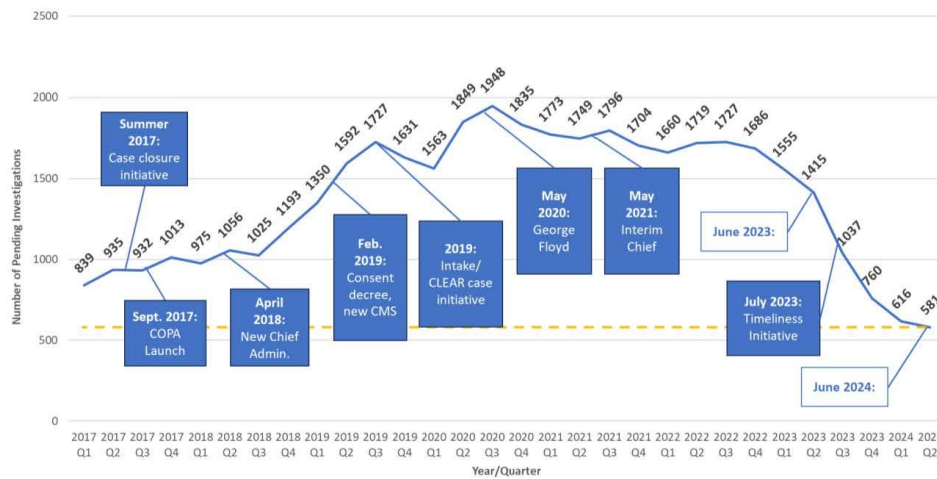
Well before 2023, COPA's leadership recognized the accountability risk of unsustainable caseloads and lack of investigative timeliness in disciplinary outcomes. In September of 2017, COPA began operations as successor to its predecessor civilian oversight agency, the Independent Police Review Authority (IPRA), with investigative jurisdiction over certain categories of misconduct of CPD members. COPA inherited IPRA's entire investigative caseload, which meant that on day one of COPA's operations, the agency had over 900 open investigations (see Figure 1 on the following page). Additionally, in its reincarnation, COPA's jurisdiction was broadened to include administrative investigations of Fourth Amendment violations (improper search or seizure) as well as sexual misconduct and domestic violence.² Finally, COPA expanded into a larger footprint in the city's police accountability system, taking on many new investigative, intake, and transparency requirements with the enactment of the Consent Decree in 2019.

¹ See e.g., Paragraphs 470 and 479, Consent Decree entered in *State of Illinois v. City of Chicago*, 17-cv-6260.

² Municipal Code of Chicago, Section 2-78-120.

Jurisdictional expansion and increased mandates resulted in a steady increase in COPA’s caseload. Fourth Amendment investigations soon began accounting for the largest percentage of COPA’s investigations.³ Investigations of sexual misconduct and domestic violence proved to be highly complex and resource intensive (see Section IV, below). Without a clear plan to manage these expanding investigations as the new agency launched, COPA’s caseload ballooned in 2018 and 2019 (see Figure 1 below).

Figure 1. Historical Pending Investigations by Quarter End (2017 – 2024)



Note: Data are pulled at the end of each quarter.

In recognition of the rising caseload in 2020, COPA began initiating efficiency efforts at the complaint entry point of its Intake Unit. In early 2020, a new Supervising Investigator was appointed to reduce the backlog of complaints in Intake, leading to a downward trend in the number of pending cases. However, during the summer of 2020, Intake experienced an unprecedented influx of complaints due to civil unrest following the murder of George Floyd, with the total complaint volume nearing 800 cases, representing over 40% of COPA’s total open complaints. During this time, it became clear that performing fulsome investigations leading to Final Summary Reports (FSRs) of all or a substantial portion of these complaints was not sustainable.

COPA also adopted a more strategic approach to its discretion in making jurisdictional decisions consistent with its enabling ordinance, as well as more complete review of body-worn camera evidence and legal analysis during the preliminary investigation in Intake. These operational changes increased COPA’s ability to identify cases with viable complaints within its jurisdiction. Consequently, COPA’s complaint retention percentage decreased from approximately 40% to 20%, thereby ensuring COPA’s ability to maintain a more sustainable caseload. Additionally, supervising

³ See, e.g., [COPA 2022 Annual Report](#), pp. 22-23.

investigators were authorized to make notes directly in COPA’s case management system to justify the closure of complaints, streamlining the process and eliminating the need for separate documentation. By December 2020, the total number of complaints in Intake had decreased to approximately 250. This downward trend continued throughout 2022 and 2023, with the number of complaints dropping to under 100, and the creation of a benchmark that all complaints spend less than 30 days in Intake in a preliminary investigation posture.

During early 2023, through its conversations with Labor attorneys at the Department of Law (DOL), COPA became aware that the FOP, which represents a large majority of CPD Members under its jurisdiction, sought an investigative time limit provision to its CBA in negotiations of its successor agreement with the city. The possibility of such a time limit for FOP members reinforced COPA’s efforts to expeditiously implement the TIP. On December 14, 2023, the city ratified this agreement with the FOP. It provided that, beginning with investigations concluding 45 days after the agreement’s ratification, the Arbitrator of an FOP member’s grievance can convene a preliminary hearing to determine whether there was a reasonable basis for the investigation to surpass 18 months.⁴

This provision mirrored the CBAs between the city and the Sergeants, Lieutenants, and Captains agreements, the Police Benevolent and Protective Association (PBPA), with an identical 18-month time limit provision.⁵ Under both FOP and PBPA CBAs now, the city carries the burden to show “reasonable cause” and justify an investigation that lasts beyond 18 months. This provision defines “reasonable cause” as follows:

“Reasonable cause” may include, but is not limited to, such factors as unavailability of the accused Officer or a critical witness, delays attributable to the Officer or his or her attorney, the unusual complexity of the matter under investigation, the need to investigate claims or new evidence arising in the course of the investigation, the pendency of a criminal investigation involving the matter under investigation, the pendency of civil litigation involving the matter under investigation, etc.⁶

According to these agreements, this time limit shall not apply to allegations “of a criminal nature,” defined as “a violation of the Illinois Criminal Code, the criminal code of another state of the United States or a criminal violation of a federal statute.”⁷

Under labor law, the city must afford CPD members under threat of discipline with “just cause,” which generally requires an employer to afford adequate due process, including timeliness of discipline, to an employee before disciplining them.⁸ Seen through this lens, 18 months is often a threshold in which arbitrators grant a CPD member’s grievance based upon timeliness alone – even before enactment of the time limit provision in the FOP CBA.⁹ COPA observed arbitrators penalize

⁴ City of Chicago, “Agreement between the City of Chicago and Fraternal Order of Police Lodge No. 7, Effective July 1, 2017 through June 30, 2027 [FOP Agreement],” Section 8.10, Investigation Time Limits.

⁵ City of Chicago, “Agreement between the City of Chicago and the Policeman’s Benevolent & Protective Association of Illinois, Unit 156-Sergeants, Effective July 1, 2016, through June 30, 2022 [PBPA Agreement],” Section 9.4C.

⁶ FOP Agreement, Section 8.10.

⁷ PBPA Agreement, Section 6.1E.

⁸ See e.g., FOP Agreement, Section 8.1 (“No Officer covered by this Agreement shall be suspended, relieved from duty or otherwise disciplined in any manner without just cause.”).

⁹ COPA has observed arbitrators penalize the city for unduly lengthy investigations, even when CPD members do not explicitly request a preliminary hearing on the timeliness of the investigation.

the city for not only the time of the investigation itself, but also the time spanning the entire length of the disciplinary process, up until the issuance of discipline.

Essentially, the longer the investigation – and older the incident – the higher the likelihood an arbitrator will grant the grievance based upon lack of timeliness alone. Even if sustained, misconduct allegations in older cases would likely not materially affect outcomes of subsequent discipline in a progressive discipline analysis, especially given the extended time for the city to arrive at a final disciplinary decision at arbitration (see Section VI below). These observations of “downstream” impediments in the disciplinary process in 2022 and 2023 were further warning signs that a more proactive caseload management approach was necessary.

III. TIP PROCESS AND RESULTS

Beginning in July 2023, COPA supervisory staff assigned to the TIP project began a review of all open investigations that were over 18 months old – not including investigations assigned to COPA’s Special Victims Squad (see Section IV). To determine whether an investigation was appropriate for closure under the TIP, the TIP review team evaluated the nature of all potentially viable allegations involved in each case.

Certain categories of allegations were considered disqualifying, including but not limited to, Rule 14 violations, acts of domestic violence or sexual misconduct, unjustified uses of deadly force, unjustified uses of force on a restrained individual or resulting in significant injury, acts of retaliation, highly objectional instances of verbal abuse, intentional misconduct, non-procedural allegations related to the procurement or execution of a search warrant, and any allegations that could result in substantial disciplinary action.¹⁰ If an investigation did not involve one of these disqualifying allegations, the TIP review team closed the case with a non-disciplinary closure memorandum and, where appropriate, recommended retraining for the involved CPD member(s).¹¹

Initially, the TIP review team evaluated approximately 690 investigations that were opened between 2019 and 2021. In October of 2023, this review was expanded to include approximately 175 cases that were initiated between January 1, 2022, and September 1, 2022, or that had no reasonably certainty of closing within an 18-month timeframe.

COPA’s TIP entered a new phase (Phase 2) upon ratification of the FOP Agreement in December of 2023, with a looming effective date incorporating time limits of only 45 days and over the holiday season. Three courses of action were available on FOP cases approaching 18 months at this time: 1) use best efforts to meaningfully close the case with findings in the most expeditious manner possible; 2) continue to fully investigate the case even if it exceeds 18 months; or 3) initiate a non-disciplinary closure.

¹⁰ The following types of investigations were also disqualified from closure under the TIP: officer-involved shootings, fatal motor vehicle pursuits, investigations referred to the Cook County State’s Attorney’s Office for potential criminal investigation, investigations garnering a high level of public interest, and investigations that COPA re-opened at the request of an external agency.

¹¹ The specific process the TIP review team followed is detailed in guidance: COPA’s Special Project Process—Timeliness Closure Review Project via Non-Disciplinary Recommendation Closures.

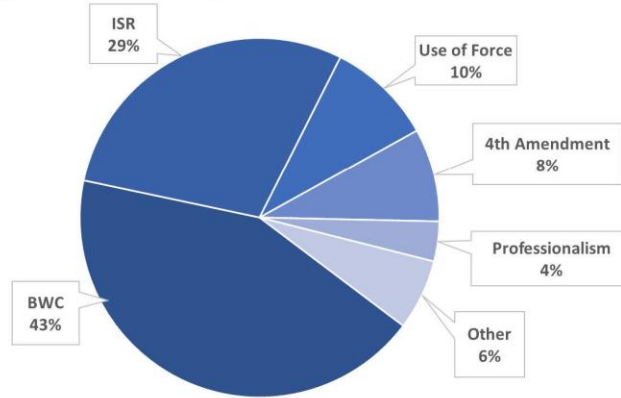
In this necessary cost-benefit analysis, it soon became clear that appropriate use of the latter option, non-disciplinary closures of certain investigations, was necessary to most effectively mitigate risk posed by the new time limit. In turn, expansion of the eligible cases for closure under the existing Non-Disciplinary Closure Memorandum was also needed to ensure the fewest number of FOP cases over 18 months old were left open beyond January 27, 2024. Accordingly, in the discretion of the Chief Administrator and appropriate investigative Deputy Chief Administrator (or designee), COPA administratively closed any case by non-disciplinary recommendation under a “totality of circumstances” determination of the following factors: seriousness of the allegation; likelihood of success on the merits; likelihood of success in a “reasonable cause” hearing; the pendency of related criminal or civil litigation; necessary investigative steps remaining; and need for public accountability.

Investigations ineligible for non-disciplinary closure in Phase 2 were those 1) with anticipated disciplinary recommendations of 180 days to separation or 2) with related pending criminal litigation against the accused officer and/or referral to a local prosecutor’s office. Due to the nature of these cases, COPA determined it to be preferable to ensure completion of these investigations and later argue for the reasonableness of any delay.

In total, the TIP review team reviewed approximately 865 cases and determined that 649 cases, or 75% of the cases reviewed, met the criteria for closure under the TIP. COPA made a total of 725 retraining recommendations for 425 different CPD members. They included 312 recommendations for retraining regarding CPD’s body worn camera (BWC) policy, 211 recommendations regarding CPD’s investigatory stop report (ISR) policy, 69 recommendations regarding CPD’s use of force policy, 61 recommendations regarding the protections afforded by the Fourth Amendment,¹² 26 recommendations regarding CPD’s professionalism policies, 16 recommendations regarding CPD’s tactical response report (TRR) policy, nine recommendations regarding CPD’s supervisory responsibilities policy, six recommendations regarding the obligation to report misconduct, and 15 miscellaneous recommendations. Figure 2 on the following page illustrates the breakdown in COPA’s retraining recommendations.

¹² Within this category, COPA made 42 retraining recommendations regarding vehicle searches, 7 recommendations regarding the search of persons, 4 recommendations regarding the probable cause to arrest, 4 recommendations regarding the reasonable articulable suspicion to detain, and 4 recommendations related to the securing of arrestee property.

Figure 2. TIP Training Recommendations (Total = 725)



Phase 2, specifically, resulted in the closure of 195 investigations between December 14, 2023, and January 27, 2024. This initiative would not have been possible without the preceding months-long TIP, which had already made a significant dent in COPA’s aging caseload, allowing investigative staff to focus on the remaining cases with the most serious allegations of misconduct.

IV. TIMELINESS AND SEX MISCONDUCT INVESTIGATIONS

As provided in Paragraph 441 of the Consent Decree and subsequent amendment to COPA’s municipal ordinance in 2022, COPA’s jurisdiction was expanded to include sexual misconduct of CPD members, both on and off duty. COPA’s Special Victims Squad (SVS) was instituted to investigate allegations of domestic violence and sexual misconduct allegedly perpetrated by CPD members.

SVS investigations entail unique dynamics and challenges that impact the duration and complexity of its cases. Such factors include maintaining complainant cooperation, repeated incidents of domestic violence, issues with responding officer misconduct, and parallel criminal investigations and/or prosecution. Moreover, these cases often involve vulnerable victims and extensive collaboration with both the Bureau of Internal Affairs (BIA) and the Cook County’s State’s Attorney’s Office.

SVS allegations often have some purported criminal element, are generally more complex, and may include parallel criminal investigation or civil litigation. Accordingly, COPA determined it to be more realistic to establish “reasonable cause” under the “criminal nature” exception to the CBAs’ time limit provisions and justify continuing these investigations beyond 18 months. This background, and the seriousness of SVS allegations, made most cases ineligible for closure under the TIP. Nevertheless, SVS was able to make significant progress in reducing its caseload during the TIP by dedicated efforts and enlisting the assistance of other staff members.

COPA’s 2023 timeliness efforts and 18-month investigative time limit addition to the FOP CBA highlighted the specific challenges for SVS and the need to further resource this team. With stricter

attention to time limits of investigations, the challenge of investigating and litigating sexual misconduct and domestic violence cases becomes even more acute. This necessitated the importance of having appropriately experienced and trained specialized investigators, Special Victims Investigators (SVIs) and an expanded SVS unit. COPA worked closely with the Office of Budget Management and the Department of Human Resources to ensure that the SVS unit will have a Director of Investigations, two Supervising Investigators and nine SVIs in 2025. COPA recommends that DOL attorneys prosecuting sexual misconduct and domestic violence cases be trained similarly so that these attorneys grasp critical components of trauma-informed and victim-centered approaches. This would ensure timelier resolutions and appropriate level of care dedicated to these cases.

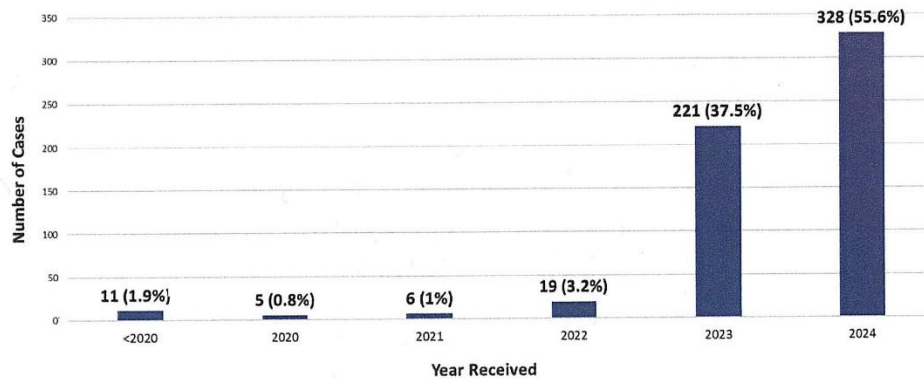
V. INVESTIGATIVE IMPROVEMENTS

Beginning in 2023, COPA implemented several new initiatives to reduce its backlog of aging cases and ensure the timeliness of its current and future investigations. The TIP was just one of these initiatives. In addition, COPA implemented corrective measures to improve the timeliness of its investigations was sustainable moving forward:

- Beginning in October 2023, COPA implemented timeliness meetings for its supervisory staff assigned to the Investigations Unit. These meetings, which are chaired by COPA's Chief Administrator, Chief of Staff, and First Deputy, involve the detailed review of all open major cases and cases that are approaching the 18-month mark.
- Since April 2023, COPA has distributed monthly reports to its Investigations Unit that detail the current caseloads and case closure numbers of all investigative staff. These reports have increased internal transparency at COPA and motivated staff to complete their investigations in a timely manner.
- COPA has taken steps to standardize and streamline its investigative process and internal review process. For example, COPA has recently provided guidance to investigators on consistent issue-spotting and allegation drafting, and it is in the process of creating standardized language for the analysis of common allegations.
- COPA has already taken steps to remedy Intake case logjam - i.e. cases not always moved out of Intake in less than 30 days, or timely reassigned upon an investigator's promotion or departure. COPA has implemented a standardized process for case reassignments, and the Intake Unit has adjusted its practices to ensure the timely completion of all preliminary investigations.
- COPA's Quality Management Unit has redesigned the metrics it uses to evaluate both major cases and general investigation cases. Since August 1, 2024, the Quality Management Unit has evaluated cases using a new Quality Analysis Report that tracks the timeliness benchmarks included in COPA's policy.
- Evaluating SVS cases and the caseload of this team further highlighted an already recognized need to better resource this squad. Throughout 2023 and 2024, COPA has taken steps to resource the team with more investigative staff and supervision to allow these cases to be investigated in a timely manner.

Due to the success of these initiatives, COPA’s open caseload has been significantly reduced, enabling its investigative staff to conduct quality investigations in a timely manner. As of October 1, 2024, COPA has 573 open cases that are currently under investigation; only 36 of these cases are over 18 months old. Additionally, COPA closed 46% of the cases it opened in 2023 in less than 180 days.¹³ Figure 3 below illustrates the age of pending investigations by year of complaint during the summer of 2024.

Figure 3. Pending Investigations by Year Received, as of August 2024



Note: Data were pulled in August of 2024. Eleven pending investigations were from complaints received prior to 2020.

Going forward, COPA will continue to ensure that its cases are investigated and closed in a timely manner. In 2025, COPA plans to revise its Performance Evaluation Program to incorporate benchmarks from its Timeliness Benchmarks Policy. This change will enable COPA’s supervisory staff to consider objective and measurable metrics in evaluating the performance of its investigative staff.

Although the primary goal of the TIP was to reduce COPA’s backlog of aging cases, it also enabled the TIP review staff to identify trends and patterns related to file maintenance, the investigative process, and other areas of potential improvement. COPA’s Intake Unit is now meeting its 30-day benchmark; in July 2024, it averaged just 18 days to log a complaint, evaluate and determine jurisdiction, and complete the entire preliminary investigation.

In COPA’s General Investigations Unit, the TIP and corrective actions have reduced caseloads to an average of eight open cases per investigator, and less than 50 open cases per supervising investigator. This reduction in volume has enabled supervising investigators to better manage their cases and reporting investigators and collectively raise compliance with attainable deadlines and the quality and thoroughness of each investigation. Finally, COPA investigators have also reported that a manageable

¹³ The 46% figure only includes the cases that COPA opened in 2023, investigated, and closed in less than 180 days. However, COPA often refers cases to BIA after conducting a preliminary investigation and determining that the alleged misconduct within COPA’s jurisdiction does not warrant the service of allegations. Including those cases, COPA closed 57% of the cases it opened in 2023 in less than 180 days.

caseload fosters more collaboration and increased ability to examine cases from multiple perspectives, resulting in “a more well-rounded and objective approach to our investigations,” as one reported.

In sum, COPA’s TIP and reduced caseload provided critical bandwidth to ensure that COPA meets its investigative benchmarks and thoroughly investigates all complaints.¹⁴ Going forward, COPA will continue to implement changes to improve its electronic Case Management System, ensure consistency in the investigative process, and increase internal accountability.

VI. INVESTIGATIVE TIMELINESS AND THE CITY’S ACCOUNTABILITY SYSTEM

COPA’s TIP and subsequent corrective measures were necessary to improve its own investigative timeliness and overall agency efficiency. However, COPA’s disciplinary investigations and recommendations do not exist in a vacuum.

COPA was able to solicit and receive feedback from its accountability partners and stakeholders before and during implementation of the TIP. COPA worked directly with the Community Commission for Public Safety and Accountability (CCPSA) in the development of the TIP and spoke about the initiative at a CCPSA public meeting. COPA discussed and received feedback from its Consent Decree monitors and subject matter experts, the Independent Monitoring Team and the Office of the Illinois Attorney General, as it planned and implemented the TIP in 2023. COPA also provided monthly updates at the Police Board’s regular public meetings during the initiative. The Public Safety Inspector General (PSIG) served as another guard rail; per its authority, it continues to perform case reviews of closed investigations under the TIP and issued Requests to Re-Open on several.¹⁵

There is, however, larger work beyond COPA to improve accountability timeliness at the city level. In its 2016 Report, the Department of Justice (DOJ) aptly observed the systemic weakness of delayed investigations in Chicago’s accountability system: “On top of the delays that occur while an investigation is still with BIA or IPRA, once an investigative finding is made, the additional layers of review by the [Command Channel Review], Superintendent, or Police Board can result in years of additional delay from the time when an allegation is sustained until discipline is actually imposed and served.” The additional risk, not examined by the DOJ, is the dilution of recommended discipline at arbitration in investigations that are deemed unreasonably lengthy. These systemic weaknesses are still present in 2024.

The Consent Decree contains dozens of requirements on investigative thoroughness and timeliness of investigations. But there are few, if any, requirements on the city’s actions and transparency thereof that occur following an investigation: through the filing of charges against a CPD member and final disciplinary decision at arbitration or Police Board.

This “accountability gap” is more acutely evident with the recent labor law changes. The 18-month investigative time limit in the FOP CBA means more timely investigations are sent to the DOL for

¹⁴ As further measure of its success, COPA provided technical assistance to Detroit’s civilian oversight entity, the Office of the Chief Investigator of the Detroit Board of Police Commissioners, on its own timeliness initiative in 2024.

¹⁵ Per COPA’s records, PSIG requested that 10 closed investigations under the TIP be re-opened. COPA agreed to re-open four, declining the others due to lack of viable allegations.

charges to be filed. And the possibility of FOP members' separation cases heard at arbitration – instead of at Police Board – means that even more cases may bottleneck in arbitrators' dockets.¹⁶ COPA expects that as more disciplinary grievances are filed each year than could possibly proceed to hearing, the existing backlog will increase further. Of additional risk is the number of separation cases of FOP members that are currently on hold at Police Board pending the FOP's appeal of a March 21, 2024 decision by a Cook County judge ruling that arbitration hearings of CPD members should be open to the public.¹⁷

Therefore, COPA's gains in timelier investigations due to the TIP must be buttressed with similar citywide improvement. COPA recommends that the city continue to consistently and sufficiently fund it to guarantee adequate staffing and resources levels to sustain timely investigations.¹⁸ COPA also recommends that the city ensure adequate staffing of attorneys at DOL and CPD, as well as arbitrators, to help break the cycle of diluted disciplinary outcomes driven by lack of timeliness.

Finally, COPA recommends that other city stakeholders follow suit with their own plans to evaluate caseloads, reduce backlog and minimize the length of time before proceeding to hearing at arbitration, including at post-closure litigation. COPA urges all stakeholders, including CPD, DOL, CCPSA, and the Office of Inspector General/PSIG, to participate in promoting timelier outcomes and drawing attention to this enduring challenge in the city's accountability system.

¹⁶ See Final Opinion and Award, In the Matter of the Arbitration between City of Chicago and Fraternal Order of Police, Chicago Lodge No. 7 ("Lodge"), Sec. 8.10 (Benn, Arb.).

¹⁷ As of July 2024, there were 13 FOP members with cases on hold at Police Board because they had sought transfer their cases to arbitration.

¹⁸ See Paragraph 521 of the Consent Decree; see also Fairley, Sharon, *The Impact of Civilian Investigative Agency Resources on the Timeliness of Police Misconduct Investigations*. New York University Journal of Legislation and Public Policy, 563 at 604 (July 30, 2023) ("a successful [oversight] entity must have the resources to recruit and retain sufficient staff and resources to fund other important non-personnel expenses.").

Appendix B | Recommendations to Reopen

OIG made 11 recommendations to COPA to reopen cases closed under the Timeliness Initiative:

Recommendation to Reopen 1: Declined¹⁵⁰

COPA lists allegations concerning sexual misconduct as among those that would disqualify an investigation for closure under its Timeliness Initiative. OIG reviewed a COPA investigation alleging that a CPD member used excessive force against the complainant when they Tased the complainant during their arrest. The complainant also alleged an unidentified CPD member at the District station inappropriately touched their genital area. The complainant alleged that the CPD member became aggressive by throwing them against the wall, kicking their legs open, and fondling them in a “sexual harassing manner.” In its review, OIG found that COPA made no record of whether it conducted any additional investigation to identify the CPD member who allegedly groped the complainant. OIG recommended that COPA reopen the investigation to investigate appropriate allegations and close the matter in accordance with policy; however, COPA declined OIG’s recommendation stating that they were “unable to corroborate the complainant’s accusations.”

Recommendation to Reopen 2: Accepted¹⁵¹

COPA investigated allegations that two CPD members arrested the complainant and searched their vehicle without justification. During its review, OIG determined that COPA misidentified one of the accused CPD members in its investigative file. The correct accused CPD member was listed by name, Star number, and Beat number on five Department reports within COPA’s investigative file. OIG recommended that COPA reopen the investigation to correctly identify the CPD member as the accused party and update that member’s disciplinary history to reflect the investigation in CMS. COPA reopened the investigation, removed the incorrectly identified accused CPD member, and added the correct accused CPD member in CMS.

COPA declined to reopen the next five investigations outlined below within a single rejection letter.¹⁵² The letter stated that COPA determined “that either there are no viable allegations of misconduct that could be sustained or that it is improbable that discipline would be imposed.” COPA also noted that the investigations were over three years old and “a review of arbitrator decisions involving similarly situated cases demonstrates that it is very unlikely that any discipline would be imposed.”

Recommendation to Reopen 3: Declined¹⁵³

COPA lists allegations concerning search warrant procurement and execution as among those that would disqualify an investigation for closure under its Timeliness Initiative. In a case OIG reviewed, two complainants stated they were asleep at the time of the search warrant execution. One of the

¹⁵⁰ 2020-0005284/C2023-000000242

¹⁵¹ 2020-0002897 /C2024-000000038

¹⁵² See also: Heather Cherone, “Police Misconduct Agency Rejects Watchdog’s Demand to Reopen 5 Probes Closed During Push to Clear Backlog,” WTTW, September 23, 2024, accessed March 11, 2025, <https://news.wttw.com/2024/09/23/police-misconduct-agency-rejects-watchdog-s-demand-reopen-5-probes-closed-during-push>.

¹⁵³ 2019-0002893/C2023-000000310

complainants stated they were only partially covered with a sheet and not wearing clothing when the involved CPD members entered their residence. The partially covered complainant alleged that they were struck in the head and foot by their bedroom door when an unknown CPD member pushed the door open during the search warrant execution, and the other complainant was handcuffed for the duration of the search warrant execution. The complainants also noted that several of the search team members were not wearing identifying information, further concealed their identities by wearing masks, and would not provide badge numbers when requested.¹⁵⁴ CPD members did not recover any contraband during the search of the residence. In fact, the complainants informed the involved officers that they were searching in the wrong apartment, as the subject of the search warrant lived upstairs. OIG recommended that COPA reopen its investigation, investigate the appropriate allegations, and close the matter in accordance with policy.

Recommendation to Reopen 4: Declined¹⁵⁵

COPA lists allegations concerning unjustified excessive force used on a restrained individual as among those that would disqualify an investigation for closure under its Timeliness Initiative. OIG reviewed a case in which, according to CPD's arrest report, two Department members observed the complainant and another individual, both appearing to be over the age of 12, riding their bicycles on the sidewalk. The members gave the complainant a verbal order to stop, but the complainant did not comply. The members "conducted wristlocks and secured resisting arrestee in handcuffs," then escorted them to the CPD vehicle. The complainant refused to place their feet inside the vehicle and kicked one CPD member several times in the chest. OIG reviewed video footage included in the investigative file, which showed the members pull the handcuffed complainant out of the vehicle by their legs and onto the ground face first. Both CPD members then placed their knees on the complainant's back for several seconds. OIG recommended that COPA reopen this investigation, investigate all appropriate allegations, and close the matter in accordance with policy.

Recommendation to Reopen 5: Declined¹⁵⁶

COPA lists allegations concerning unjustified uses of excessive force resulting in an injury as among those that would disqualify an investigation for closure under its Timeliness Initiative. Two CPD members responded to a domestic disturbance call at the arrestee's residence and observed the arrestee punch her spouse in the face. While attempting to handcuff the arrestee, the Department members grabbed her arms, but the arrestee resisted by pulling away and refusing to put her hands behind her back. One CPD member placed the arrestee in a "Full Nelson" hold and pushed the arrestee's body up against the front porch of the residence. The arrestee informed the members several times that she was not wearing undergarments under her nightgown and could feel the male member's genitalia touching her body. After the CPD members completed an emergency takedown on the arrestee, she suffered a knee injury and was transported via ambulance for medical care. The arrestee was diagnosed with an anterior knee dislocation and further referred for follow-up appointments for vascular and orthopedic surgeries. The arrestee later filed a federal civil lawsuit in the Northern District of Illinois against the involved members for use of excessive force

¹⁵⁴ Within CMS COPA initially recommended retraining for a Sergeant for the allegation that they failed to ensure subordinates were wearing their prescribed stars, name tags, unit designators, and/or rank insignias. However, this Sergeant was no longer active by the conclusion of the Timeliness Initiative and this training recommendation was not included on the list COPA provided to BIA.

¹⁵⁵ 2021-0002944 / C2023-000000345

¹⁵⁶ 2019-0004748/C2023-000000330

and settled with the City of Chicago for \$50,000.¹⁵⁷ COPA did not make any training recommendations for either involved CPD member. OIG recommended that COPA reopen this investigation, investigate all appropriate allegations, and close the matter in accordance with policy.

Recommendation to Reopen 6: Declined¹⁵⁸

COPA lists allegations concerning acts of sexual misconduct as among those that would disqualify an investigation for closure under its Timeliness Initiative. OIG reviewed a COPA investigation concerning allegations that CPD members conducted a traffic stop and search of the complainant without justification. The complainant also alleged that one of the CPD members grabbed their genital area but did not search any other part of their person. According to CPD's ISR, the involved CPD members observed the complainant fail to signal before turning at an intersection and initiated a traffic stop. The ISR narrative describes the complainant as "visibly nervous" and "sweating." The CPD members placed the complainant in handcuffs, performed a pat down of the complainant, and searched the vehicle. No contraband or weapons were discovered in the pat down or search and the complainant was released with a traffic citation. In its review, OIG found that COPA made no record of whether it considered the sexual misconduct allegation related to the CPD member allegedly grabbing the complainant's genital area. OIG recommended that COPA reopen this investigation, investigate the appropriate allegations, and close the matter in accordance with policy.

Recommendation to Reopen 7: Declined¹⁵⁹

COPA's TIP Guidance notes that, "although not an absolute disqualification," for investigative closure under its Timeliness Initiative, its review staff would consider "whether potentially viable allegations involved vulnerable individuals, including juveniles, the elderly, and disabled individuals." In a case reviewed by OIG, five accused CPD members allegedly engaged in a foot pursuit and investigatory street stop of a juvenile subject. COPA additionally alleged that the CPD members turned off their BWCs prior to the end of the interaction and failed to notify OEMC of the foot pursuit. The accused members observed a juvenile they determined was "attempting to conceal an object" from the CPD members. When the members exited their unmarked police vehicle to conduct a field interview, the juvenile subject fled and the members engaged in a foot pursuit. When the involved members apprehended the juvenile, they conducted a protective pat down but did not recover any contraband from the juvenile. COPA's investigative file shows that, in the course of its investigation, COPA had in fact reached sustained findings on some allegations and recommended two- to four-day suspensions against some involved members. COPA ultimately closed the investigation under its Timeliness Initiative and made no recommendations for training. OIG recommended that COPA reopen the investigation to conclude the investigation's findings, rather than placing the investigation in a non-disciplinary closure status.

Recommendation to Reopen 8: Accepted¹⁶⁰

COPA lists allegations concerning acts of sexual misconduct as among those that would disqualify an investigation for closure under its Timeliness Initiative. COPA investigated allegations that CPD members used excessive force against an arrestee, who was a juvenile at the time, by kicking and punching them, that a CPD member inappropriately searched the arrestee's genital area during their arrest, and that a CPD member failed to activate their body worn camera. According to the

¹⁵⁷ Mitchell v. City of Chicago, et al., (N.D. Ill., Aug. 13, 2021) 1:19-CV-8239.

¹⁵⁸ 2019-0000914 / C2024-000000395

¹⁵⁹ 2022-0000083 / C2024-000000413

¹⁶⁰ 2020-0001911 / C2024-000000048

arrest report, the CPD members observed the arrestee soliciting illegal narcotics and placed the arrestee in custody. A witness to this event initiated a complaint with COPA, reporting that they observed the CPD members force the handcuffed arrestee to the ground after which the members began kicking and punching the arrestee outside of a high school. The witness stated that the arrestee also alleged that a CPD member “touched [their] pussy.” During an interview with COPA, the arrestee stated that one of the CPD members repeatedly searched inside their pants and kept rubbing their “private part” inappropriately for an extended time. In its review, OIG found there was no evidence in the investigative file that COPA conducted an analysis of the sexual misconduct allegations nor were the allegations formally categorized as sexual misconduct. OIG recommended that COPA reopen this investigation to address the sexual misconduct allegations and close the matter in accordance with its policy. COPA agreed to reopen this investigation. In its subsequent investigation, COPA properly categorized the allegation as sexual misconduct and then placed the investigation in a Close Hold status pending the outcome of the accused CPD member’s Police Board hearing concerning four separate investigations where the member was accused of committing similar misconduct.

Recommendation to Reopen 9: Accepted¹⁶¹

COPA lists allegations concerning unjustified uses of force against a restrained individual and acts of retaliation by Department members as allegations that are disqualified from closure under the Timeliness Initiative. In August 2020, CPD members were dispatched to check on the well-being of an individual who was described as a person removing their clothes in the middle of the street. When the individual became uncooperative, the CPD members placed them into handcuffs and attempted to put them into an ambulance. The arrestee kicked a CPD member in the chest, knocking off their camera, and the member is heard on BWC stating, “[the arrestee] just bit me.” On another member’s BWC, the CPD member who was bitten is shown with their hand around the arrestee’s neck for approximately five seconds. After the CPD member removes their hand from the arrestee’s neck, the arrestee states, “Ow, that shit hurt really bad, but okay.” The CPD member who was bit and had their BWC knocked off tells a CFD paramedic, “Good thing my camera wasn’t on because I was going to choke...” before the paramedic tells the member that the camera is active. CPD’s Force Review Division (now known as TRED) initiated this complaint against the CPD member who was bitten for retaliation and excessive force. Based on the available video evidence and the disqualifying allegations listed within the Timeliness Initiative’s “Review Criteria,” OIG recommended that COPA reopen this investigation to investigate all appropriate allegations and close the matter in accordance with its policy. COPA agreed to reopen this investigation. Upon reopening its investigation, COPA sustained allegations against the CPD member for applying force to the complainant’s neck and recommended a 1- to 30-day suspension and retraining on CPD’s Use of Force policy.

Recommendation to Reopen 10: Accepted¹⁶²

COPA lists allegations concerning unjustified excessive force used on a restrained individual as among those that would disqualify an investigation for closure under its Timeliness Initiative. In August 2022, CPD members responded to an attempted armed robbery in which the victim alleged the subject pointed a gun at them before fleeing on foot. The CPD members caught up with the subject, conducted a protective pat down, and recovered the firearm. After securing the firearm, BWC footage shows a CPD member walk towards the subject, who is restrained by three other CPD members with one handcuff on, and strike the subject in the leg/torso area. In the TRR, the

¹⁶¹ 2021-0000718 /C2024-000000095

¹⁶² 2022-0003489 / C2024-000000230

CPD member reported that they used a knee strike “in an attempt to overcome resistance/aggression” and reported that the subject was “actively resisting officers.” However, CPD policy distinguishes between assailants and active resisters and only authorizes direct mechanical techniques when the subject is an assailant. OIG found that this investigation involved allegations of unjustified use of excessive force against a subject whose hands were restrained behind their back by several CPD members and recommended reopening the investigation to address the excessive force allegations which disqualified the case from closure under the Timeliness Initiative. COPA agreed to reopen this investigation. In its subsequent investigation, COPA sustained allegations against the CPD member for striking the subject “on or about the legs or stomach with a knee without justification.” COPA recommended a suspension of up to 30 days.

Recommendation to Reopen 11: Accepted¹⁶³

COPA lists allegations concerning unjustified excessive force used on a restrained individual as among those that would disqualify an investigation for closure under its Timeliness Initiative. Additionally, COPA’s TIP Guidance notes that “although not an absolute disqualification,” for investigative closure under its Timeliness Initiative, its review staff would consider “whether potentially viable allegations involved vulnerable individuals, including juveniles, the elderly, and disabled individuals.” OIG reviewed a case in which two CPD members observed an individual who was running with a handgun enter a residence. According to the police report, the CPD members were in hot pursuit and forced entry into the residence by kicking open the front door. Inside the residence, the members pointed their firearms at the occupants and a physical altercation ensued, causing the CPD members to call for emergency backup. The CPD members reported “being surrounded by all the offenders” and directed three bursts of OC spray at the group. After backup arrived, BWC showed the original CPD members attempt to handcuff the individual first observed with the firearm. One CPD member performed an emergency takedown causing both the CPD member and individual to fall down a flight of stairs. While the individual was on the ground with a CPD member laying on top of them, another CPD member reported in their TRR that they “delivered six closed hand strikes to the face of the subject.” On BWC, the individual tells the CPD members that they have asthma, cannot breathe, and complain about the OC spray in their eyes. Case reports completed for this incident indicate the individual was 14 years old. OIG recommended that COPA reopen its investigation as it contained allegations which disqualified the case from closure under the Timeliness Initiative, investigate the appropriate allegations, and close the matter in accordance with policy. COPA agreed to reopen this investigation. Although COPA agreed to reopen the case, it then administratively closed the investigation after determining too much time had passed to bring excessive force allegations against the involved members.

¹⁶³ 2021-0002050/ C2024-000000096



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