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	8	IN THE UNITED STATI	ES DISTRICT COURT				
	9	FOR THE DISTRICT OF ARIZONA					
	10	Manuel De Jesus Ortega Melendres, on	No. CV-07-2513-PHX-GMS				
	11	behalf of himself and all others similarly situated; et al.,					
Z MY 7	12	Plaintiffs,	DEFENDANT PAUL PENZONE'S				
SOR LED	13	and	NOTICE REGARDING ANNUAL COMPLIANCE REPORT FOR				
OSBOR MALED ATTORNEYS A	14	United States of America,	FISCAL YEAR 2022-23				
	15	Plaintiff-Intervenor,					
3	16	Vs.					
	17						
	18	Paul Penzone, in his official capacity as Sheriff of Maricopa County, Arizona, et					
	19	al.,					
	20	Defendants.					
	21	Pursuant to Document 606, Paragraph	h 12, Sheriff Paul Penzone provides to the				
	22	Court, Parties, and Monitor the Annual Compliance Report by the Maricopa County					
	23	Sheriff's Office Court Implementation Division for fiscal year 2022-2023. A copy of					
	24	_	sion for fiscal year 2022-2025. A copy of				
	25	the Report is attached as Exhibit A.					
	26	Dated this 15th day of Sontamber 20	22				
	27	Dated this 15th day of September, 20	۷۵.				

OSBORN MALEDON, P.A. By s/ Mary O'Grady Mary R. O'Grady Kristin L. Windtberg Joshua J. Messer 2929 North Central, Suite 2000 Phoenix, Arizona 85012 **Attorneys for Defendant Paul Penzone**

EXHIBIT A

MARICOPA COUNTY SHERIFF'S OFFICE PAUL PENZONE, SHERIFF

COURT IMPLEMENTATION DIVISION



2023 ANNUAL COMPLIANCE REPORT

JULY 1, 2022-JUNE 30, 2023

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EXECUTIVE SUMMARY

This 2023 Annual Report assesses the Maricopa County Sheriff's Office's ("MCSO" or "Office") level of compliance with the Hon. G. Murray Snow's October 2, 2013 Supplemental Permanent Injunction/Judgment Order (Doc. 606), as amended (the "First Order"), the July 26, 2016 Second Supplemental Permanent Injunction/Judgment Order (Doc. 1765), as amended (the "Second Order") and the November 8, 2022, Amended Third Supplemental Permanent Injunction/Judgment Order ("Third Order," Doc. 2827) (collectively, the "Court's Orders"). This report covers the fiscal year from July 1, 2022, through June 30, 2023.

This Annual Report is submitted to comply with Paragraphs 12 and 13 of the Court's Orders. It includes a summary of the Monitor's quarterly assessments of MCSO's compliance with the Court Orders and a description of some of the major work during the past year. There are two phases to the Monitor's compliance assessment. The Phase 1 compliance assessment entails consideration of whether MCSO has developed and approved requisite policies and procedures and personnel have received documented training on that content. Phase 2 compliance is typically considered operational implementation and requires MCSO to comply with the requirements of the Court's Orders more than 94% of the time or in more than 94% of the instances under review. Overall, the Monitor gives MCSO a compliance rating on 226 Paragraphs of the Court's Orders.

Under the direction of Sheriff Penzone, MCSO is committed to achieving compliance with the Court's Orders. When Sheriff Penzone took office, MCSO was in 79% Phase 1 compliance and 57% Phase 2 compliance with the First Order, and was in 12% Phase 1 compliance and 60% Phase 2 compliance with the Second Order. Significant progress has been made. When the 2022-23 fiscal year began, MCSO was in 99% Phase 1 compliance and 78% Phase 2 compliance with the First Order. It was in 100% Phase 1 compliance and 93% Phase 2 compliance with the First and Second Orders. It was in 82% Phase 2 compliance with the First Order and 93% Phase 2 compliance with the Second Order. It also began its compliance efforts with the new Third Order in this fiscal year. By the end of the First Quarter of 2023, MCSO was in 20% Phase 1 compliance with the Third Order and 50% Phase 2 compliance.

According to the Monitor's Thirty-Sixth Quarterly Report (First Quarter 2023), MCSO is in "Full and Effective Compliance," with 152 Paragraphs of the 208 Paragraphs in the First and Second Orders on which MCSO is rated. "Full and Effective Compliance" means that MCSO has successfully complied with the paragraph requirements for at least three years, and the Monitor has concurred with MCSO's assertion of Full and Effective Compliance. When the 2022-23 fiscal year began, MCSO was in Full and Effective Compliance with 125 Paragraphs.

Compliance requires an extensive commitment throughout MCSO. MCSO has a Bureau of Compliance consisting of several sections: the Court Implementation Division ("CID"), the Bureau of Internal Oversight ("BIO"), the Professional Standards Bureau ("PSB"), and the Training Division. While each of these sections maintains a specific purpose, collectively their focus is to promote compliance efforts and ensure existing compliance is maintained while collaborating with the Monitoring Team and the Parties to meet the requirements of the Court's Orders. This is accomplished through developing, updating, and implementing policies, procedures, training protocols, and lesson plans and through internal audits, inspections, and reports.

In an effort to continue moving forward with compliance efforts, Sheriff Penzone has made changes in the executive command staff to include the promotion of Captain James McFarland to Deputy Chief over Patrol East which includes District 1 (East Mesa and Guadalupe), District 4 (Carefree, Cave Creek, New River, and Anthem), and District 7 (Fountain Hills). Former Chief of Custody, Barry Roska, was promoted to Executive Chief over all Enforcement Operations. Michael Caputo also joined MCSO after a long career with the FBI and serves as Executive Chief of Compliance/Training.

MCSO's efforts related compliance with the Court's Orders over the past year include:

- Audits and Inspections. Over the course of the year, the Auditing and Inspections Unit ("AIU"), within BIO, conducted inspections in various areas including: CAD Messaging/Alpha Paging, Misconduct Investigations, Incident Reports, Patrol Shift Rosters, Traffic Stop Data Collection, Employee Emails, Facilities and Property, Complaint Intake Testing, Supervisory Notes (sworn, detention, and civilian), TraCS (Traffic and Criminal Software) Discussions, TraCS supervisory review, Patrol Activity Logs, Early Identification System ("EIS") Alerts, Post-Stop Ethnicity Inspections, Semi-Annual Bias-Free Reinforcement Inspections, Constitutional Policing Plan Briefing Inspections, Targeted Integrity Inspections, and Passenger Contacts and Searches. These inspections provide information to MCSO management to ensure employee compliance with Office policies and procedures and provide corrections where deficiencies are noted.
- Traffic Stop Studies. MCSO continued to conduct a variety of sophisticated analyses of its traffic stop data to identify potential disparities based on race or ethnicity and develop a foundation for further follow up as needed. This work includes monthly, quarterly, and annual traffic stop studies, each of which has a different focus.

Monthly Traffic Stop Reviews and Interventions. The pilot for the Traffic Stop Monthly Report ("TSMR") that began in April 2021 was completed in this fiscal year, and this monthly review of traffic stops has become part of MCSO's standard practices. The TSMR analyzes traffic stop data on a monthly basis and based on the TSMR, MCSO intervenes with deputies who show warning signs or indicia of bias-based policing. The TSMR is an innovative, data-driven program that analyzes the traffic stop enforcement behavior of all patrol deputies over a rolling 12-month period. The analysis is designed to identify deputies whose traffic stop outcomes are racially or ethnically disparate from their peers on five benchmarks: stop length, citation rate, search rate, arrest rate, and seizure rate.

Annual Analysis of Traffic Stops. MCSO published its eighth Traffic Stop Annual Report ("TSAR") during the Second Quarter of 2022. This TSAR analyzed traffic stops occurring during the 2022 calendar year.

Quarterly Traffic Stop Studies. MCSO completed four quarterly "deep dive" reports on traffic stop topics of interest ("TSQRs") in this fiscal year. This year's TSQRs addressed disparities in traffic stop outcomes over time, in special assignments, in searches, and among low-stop-volume deputies.

Follow up on Traffic Stop Analyses. The traffic stop analyses provide the basis for further action by MCSO. The Office conducts presentations to inform MCSO personnel of the results, and the TSQRs and TSARs are all available to the public on MCSO's website. Because disparate outcomes based on race and ethnicity have been identified in studies, MCSO continues to provide training and take other actions to attempt to reduce disparities. The TSMR process, which provides individual interventions, is an integral part of the effort to reduce disparities in traffic stop outcomes.

- Ongoing Policy Assessments. This fiscal year, MCSO continued to timely create and update its policies and procedures. Policy Assessments are critical to establishing foundations for employees to have a clear understanding of Office expectations and procedures. To ensure compliance with the Court's Order, MCSO continues to comprehensively review all Office patrol operations policies and procedures. Court Order related policies and procedures are also submitted to the Monitoring Team and Parties for review and for Monitor approval.
- **Employee Performance Appraisals.** MCSO implemented a new Employee Performance Appraisal (EPA) system in this reporting year. This was a significant project that is intended to facilitate compliance with the requirements of the Court's Orders regarding employee reviews and improve the overall employee appraisal process.
- **Training.** As it has since compliance efforts began, MCSO provides specific training to address the requirements of this Court's Orders. The comprehensive program involves developing and updating curriculum, delivering training through qualified teachers, and tracking employee completion of training requirements. The Training Division continues to look for ways to improve its programs to be responsive to the needs of MCSO and progress toward compliance with the Court's Orders.
- Community Engagement. MCSO continues to collaborate with several community advisory boards, including the Court-ordered Community Advisory Board ("CAB"). A member of the MCSO's Executive Command is appointed as the single point of contact responsible for facilitating and organizing meetings, providing documents for review, and soliciting feedback from CAB members. MCSO's Community Outreach Division ("COrD") coordinates an extensive outreach program that provides varied opportunities for engagement with the community throughout the year.
- Quarterly Compliance Assessments. Both MCSO and the Monitor are required to prepare quarterly compliance reports. The Monitor's quarterly reports are placed on MCSO's online learning tool, The HUB, to allow all employees access to the reports. MCSO employees at the rank of Lieutenant and above are required to read these reports to emphasize the importance of gaining compliance with the Court's Orders along with the steps necessary to achieve compliance in areas in which they may have influence.
- Administrative Investigations. The Court imposed a Third Order during this year because of the
 backlog of administrative investigations. MCSO's PSB implemented several initiatives during this
 reporting period, even before the Court's Third Order, aimed at reducing the backlog and at
 compliance with the Court's Orders, including implementation of an enhanced case processing

tracking mechanism, elimination of the backlog of cases delayed in the review stage(s), restructuring and reorganizing staff responsibilities and assignments to maximize investigative capabilities, hiring to fill positions that became vacant due to retirements or resignations as well as hiring additional staff, and contracting with an outside vendor to bring on contracted investigators to assist with investigations of misconduct complaints.

MCSO is committed to achieving its goal of "Full and Effective Compliance" with all paragraphs in the Court's Orders. This is a top priority for Sheriff Penzone. MCSO continues to dedicate significant financial and personnel resources to advance the organization toward compliance.

COORDINATING COMPLIANCE WITH *MELENDRES* COURT ORDERS

In October 2013, MCSO formed the Court Compliance and Implementation Division consistent with Paragraph 9. In February 2015, MCSO changed the name of this division to the Court Implementation Division, or "CID." In this fiscal year, CID was comprised of 12 MCSO personnel with interdisciplinary backgrounds and various ranks including, 1 Captain, 2 Sergeants, 2 Deputies, 5 Management Analysts, 1 Management Assistant and 1 Administrative Assistant.

CID works closely with MCSO legal counsel and MCSO Command Staff to ensure that MCSO maintains a sustained effort to achieve its goal of Full and Effective Compliance with the Court's Orders. CID coordinates site visits and other activities with the Monitoring Team and Parties, as the Court's Orders require. CID strives to maintain a positive and professional working relationship with the Monitor and Parties. It is committed to its vital role in the reform process and reaching MCSO Executive Command's goal to expeditiously achieve Full and Effective Compliance. CID assists commanders from various divisions and districts in identifying areas for improvement in connection with the Office's efforts toward compliance.

A significant part of CID's responsibilities involves producing documents as required by the Court's Orders. During this fiscal year, CID produced approximately 600,000 pages of documents. In addition to the Monitor's document requests, the CID facilitates the production of training material and policies and procedures to the Monitor for review and approval. With the Sheriff's approval, CID ensures the proper allocation of document production requests to the appropriate MCSO units. This document production work involves MCSO divisions, bureaus, Command Staff, as well as personnel from the Maricopa County Attorney's Office ("MCAO").

CID is in Full and Effective Compliance with all of its responsibilities under the Court's Orders (Paragraphs 9-13) and continues to work with other areas within MCSO as well as the Monitoring Team and Parties to support all compliance efforts.

INSPECTIONS AND QUALITY ASSURANCE AUDITS

Consistent with the Court's mandate to engage in periodic audits, on September 29, 2014, the MCSO created the Bureau of Internal Oversight ("BIO") to provide timely and professional auditing, inspections, technical, and review services. The BIO provides assessments of employee performance, management performance, and division performance, among other topics, with a goal of promoting the integrity, economy, efficiency, and effectiveness of MCSO programs, services, and activities. BIO inspections and audits allow MCSO to assess whether personnel are in compliance with the Court's Order and MCSO Policy.

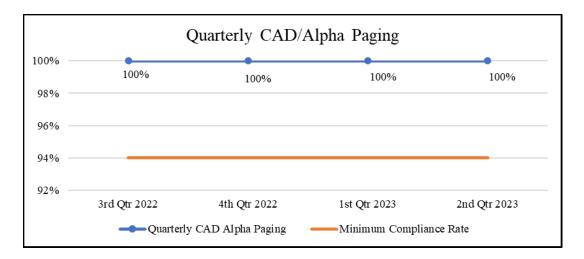
BIO-AIU's primary function is to conduct audit and non-audit services for MCSO. The AIU conducts audits and routine compliance inspections on an ongoing basis. The purpose of the audits is to determine compliance with MCSO policy, promote proper supervision, and support compliance with the Court's Order. During this annual review period, BIO completed the following inspections to verify compliance with the Court's Order requirements and identify any deficiencies. Once deficiencies are identified, information is sent to supervisors using the EIS. Additionally, BIO reviews inspection reports for patterns and trends. Identified issues are then disseminated in the EIS Quarterly Evaluation and briefed during internal town halls. Below each inspection description are the corresponding compliance findings of each inspection in this reporting period.

BIO Action Form Study

The Bureau of Internal Oversight has conducted two BIO Action Form Tracking Studies: 1) All issued BAFs approved during the January 2021 thru December 2021 (calendar year); and 2) All issued BAFs approved during the 2022 fiscal year were reviewed (July 1, 2021 – June 30, 2022), to identify underlying patterns found within the agency, divisions, and individual supervisor levels. AIU analyzed collected data using the same methods (there is a six-month overlap in data) to determine whether findings were similar or different. The main categories of deficiencies were Lack of Documentation Issues, followed by the Time Management Issues. The current BAF Study reviewed the impact of an electronic Shift Roster implementation through the PRAXIS system. The data showed that the number of deficiencies and issued BAFs were significantly minimized, and the inspection was no longer considered to have a high deficiency rate. A review of the data indicated that there are very few repetitive deficiencies, or patterns of deficiencies, for any individual supervisors' subordinates, and no agency and division wide patterns were noted. Findings are provided to enforcement command.

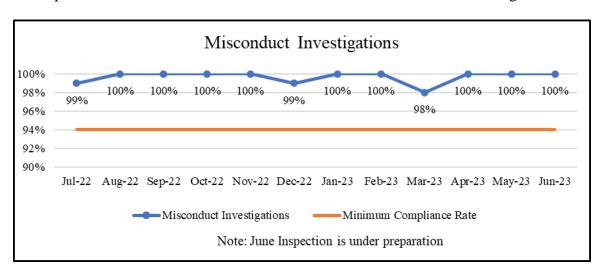
Computer Aided Dispatch ("CAD")/Alpha Paging Messaging Inspection

The CAD Messaging/Alpha Paging System inspection is to ensure that CAD and Alpha Paging Messaging system entries adhere to MCSO Policy and that those systems are not used by employees to discriminate or denigrate any persons. This inspection is conducted quarterly.



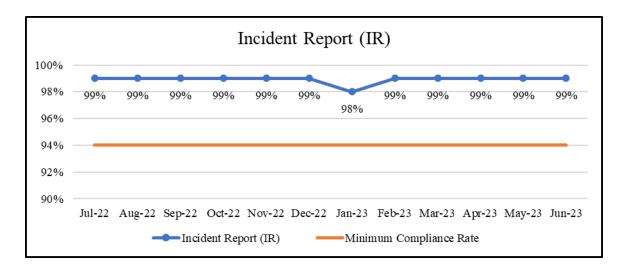
Misconduct Investigations Inspection

The purpose of this inspection is to determine if the selected administrative misconduct investigations were conducted in compliance with MCSO Policy and Paragraphs 33, 102, and 104 of the Court's Orders. This inspection is completed monthly and a random sample of 10 closed cases are selected by the Monitor for inspection. This assessment does not consider the timeliness of the investigations.



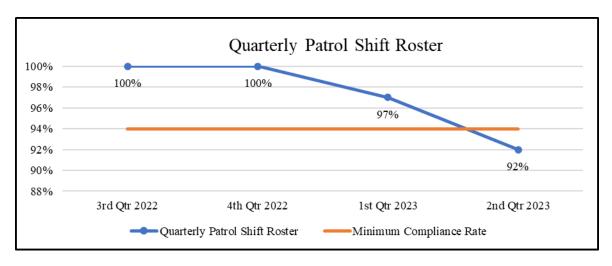
Incident Report Inspection

The Incident Report Inspection seeks to ensure that incident reports adhere to MCSO Policy, federal and state law, promote proper supervision, and support compliance with Paragraphs 75, 93, 94, and 96 of the Court's Order. For this inspection, the Monitor randomly selects up to 20 Incident Reports turned down by the County Attorney for no probable cause, 20 in-custody reports, and 20 criminal citations. Each inspection is reviewed using a 27-point inspection matrix. Using this matrix, compliance ratings are given for each inspection point and all inspections are calculated using validated, objective methodology. This methodology typically involves staff performing 1,080 total inspection points each month.



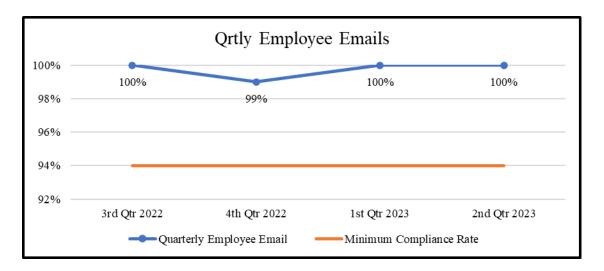
Patrol Shift Roster Inspection

The Patrol Shift Roster Inspection is conducted to ensure compliance with MCSO Policy GB-2, *Command Responsibility*, and with Paragraphs 82, 84, and 86 of the Court's Order. The quarterly inspection consists of a random selection of 12 calendar days per month, in which the shift rosters completed in those calendar days are inspected. Each roster is inspected using an inspection matrix with 4 compliance inspection points. Additional non-compliance related areas are inspected such as the accurate input of information in the roster. During this reporting period, MCSO transitioned the shift roster from an Excel based spreadsheet requiring supervisors to manually input every data point to a Praxis program which improved accuracy by automated data points for each selected employee.



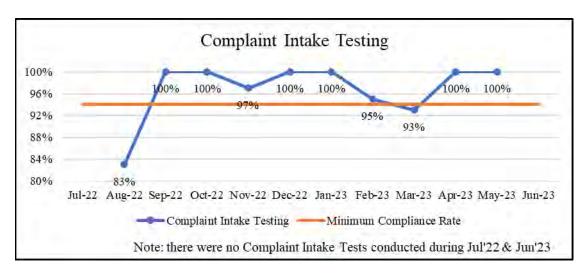
Employee Email Inspection

The Employee Email Inspection is conducted to ensure that employee email accounts are utilized in compliance with MCSO Policy and Paragraphs 23 and 103 of the Court's Order. A total of 50 employees' emails are randomly selected each quarter (17 employees for two months and 16 for the third month) for inspection.



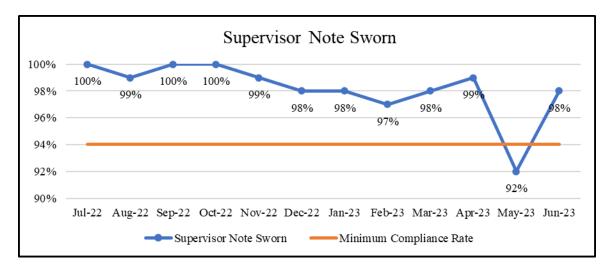
Complaint Intake Testing Inspection

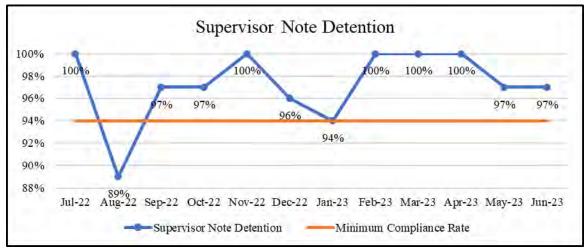
The Complaint Intake Testing Inspection is conducted to ensure consistency with MCSO Policy GH-4, *Bureau of Internal Oversight*, the AIU Operations Manual, and with Paragraphs 254-260 of the Court's Order. This testing program is designed to assess whether MCSO employees are providing civilians appropriate and accurate information about the complaint process and whether MCSO employees are notifying PSB upon the receipt of a civilian complaint. The Complaint Intake Testing Annual Report is published annually on the MCSO website.

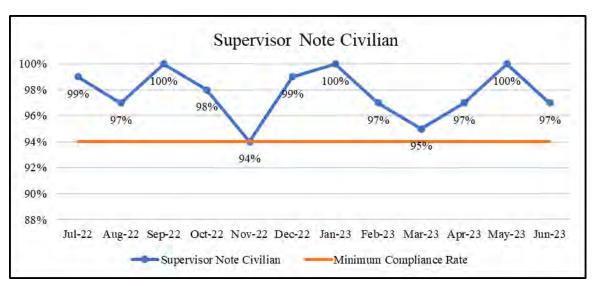


Supervisory Notes Inspection

The Supervisory Notes Inspection is conducted on sworn, detention, and civilian personnel to ensure that Supervisory Note entries in the Blue Team application are compliant with MCSO Policy and with Paragraphs 69, 70, 72, 75, 79, 81, 97, and 103 of the Court's Order. This inspection is conducted by uniformly inspecting the Supervisor Note entries within the IAPro database for the randomly selected employees, utilizing the matrix developed by AIU in accordance with Office Policies CP-8, *Preventing Racial and Other Bias-Based Profiling*, EA-11, *Arrest Procedures* EB-1, *Traffic Enforcement, Violator Contacts, and Citation Issuance* and EB-2, *Traffic Stop Data Collection*, GB-2, *Command Responsibility*, and GJ-35, *Body-Worn Cameras*.

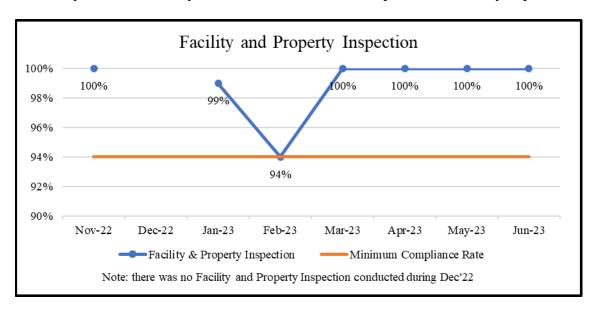






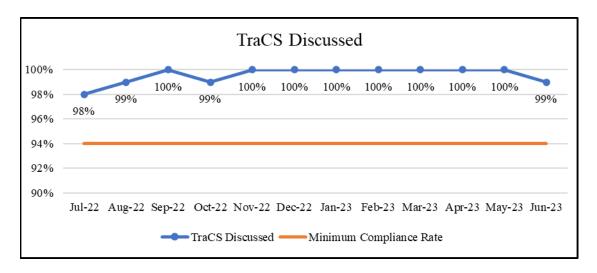
Facility and Property Inspection

The Facility and Property Inspections are conducted to ensure that (1) all MCSO Sworn and Detention facilities are operating within MCSO Policy and (2) property and evidence is being properly secured and stored at the respective facility. These inspections additionally ensure that facilities are not being used in any way that discriminates against or denigrates anyone. The Facility and Property Inspection typically alternates monthly between Sworn and Detention facilities (July-Detention, August-Sworn, etc.). All the scheduled facility inspections, both Sworn and Detention, were temporarily postponed due to the COVID-19 pandemic. However, since January 2023, the Audits and Inspections Unit resumed their monthly inspections, alternating monthly between Sworn and Detention facilities. Sworn facilities were inspected in January, March, and May. Detention facilities were inspected in February, April, and June.



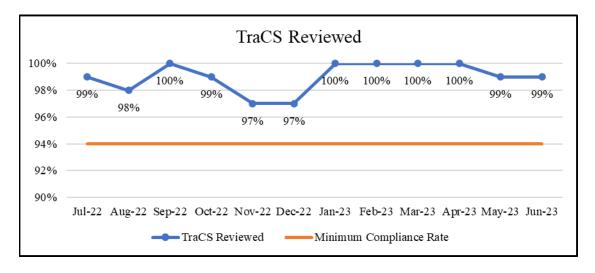
TraCS Discussed Inspection

The TraCS Discussed Inspection is completed to determine supervisory compliance with MCSO Policy and Paragraphs 69, 81, and 85 of the Court's Order, as well as to promote proper supervision. This inspection is conducted using the TraCS System. A random sample of traffic stops selected by the Monitor is uniformly inspected utilizing the AIU matrix, in accordance with the procedures outlined in Office Policies EA-11, *Arrest Procedures*, EB-1, *Traffic Enforcement, Violator Contacts, and Citation Issuance*, and GB-2, *Command Responsibility*. The goal is to determine if a supervisor discussed the traffic stop with the deputy within 30 days of the stop being made.



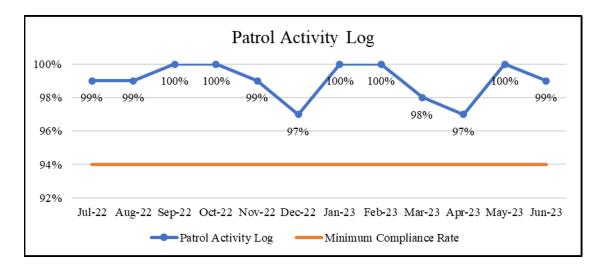
TraCS Reviewed Inspection

The TraCS Reviewed Inspection is completed to determine supervisory compliance with MCSO Policy and Paragraphs 69, 81, and 85 of the Court's Order, as well as to promote proper supervision. This inspection is conducted using the TraCS System. A random sample of traffic stops selected by the Monitor is uniformly inspected utilizing the AIU matrix, in accordance with the procedures outlined in Office Policies EA-11, *Arrest Procedures*, EB-1, *Traffic Enforcement, Violator Contacts, and Citation Issuance*, and MCSO Administrative Broadcast Number 16-56. The goal is to determine if a supervisor reviewed a traffic stop conducted by a deputy within 72 hours.



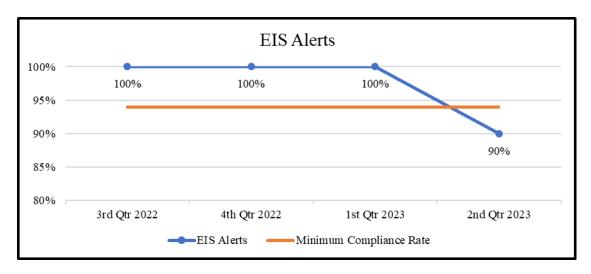
Patrol Activity Log Inspection

The Patrol Activity Log Inspection is conducted to ensure compliance with MCSO Policy and with Paragraphs 83 and 103 of the Court's Order, as well as promoting proper supervision. Patrol Activity Logs are uniformly inspected utilizing the AIU matrix, in accordance with procedures outlined in MCSO Administrative Broadcast Numbers 16-53, 16-100, and 17-48. The Monitor selects a sample of 35 deputies each month from all Patrol Districts/Divisions. All the patrol activity logs generated by each deputy during the month are inspected using the AIU matrix.



EIS Alerts Inspection

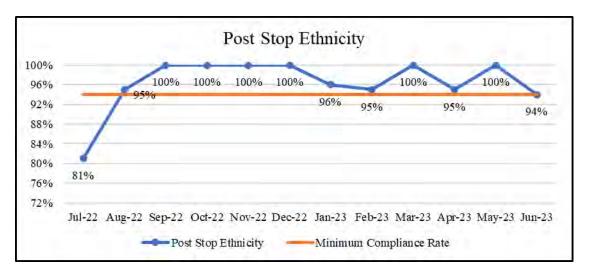
The EIS Alerts Inspection is conducted to ensure consistency with MCSO Policies GB-2, *Command Responsibility* and GH-5, *Early Identification System* and to promote proper supervision. The AIU conducts inspections of the EIS Alerts monthly. The Monitor selects a random sample of closed EIS Alerts for inspection. AIU uses the EIS Alerts Inspection Matrix to ensure that the selected EIS Alerts are returned to the EIU in the required timeframe. Starting in May 2020, BIO began to track all new EIS Alerts using project management software to assist Divisions in submitting the Alerts in the timeframes required by Office Policy. In addition to the system generated reminders, BIO utilizes liaisons to assist Divisions. BIO Commanders also will contact the Divisions as the due dates approach to offer assistance.



Post Stop Ethnicity Inspection

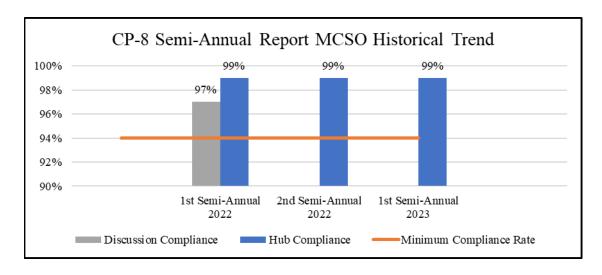
The Post-Stop Ethnicity Inspection is conducted to ensure that Sworn personnel accurately record prestop and post-stop ethnicity selections during traffic stops on the Vehicle Stop Contact Forms and are adhering to MCSO Policies EB-1, *Traffic Enforcement, Violator Contacts, and Citation Issuance*, EB-2, *Traffic Stop Data Collection*, GJ-35, *Body-Worn Cameras*, CP-2, *Code of Conduct*, CP-5, *Truthfulness*, and CP-8, *Preventing Racial and Other Bias-Based Profiling*. To achieve accurate inspection results, the inspector will utilize data obtained from the TraCS system, Body-Worn Camera video, and a list of

Hispanic surnames approved by the Monitor on May 20, 2019. These entries are uniformly inspected utilizing a matrix that BIO developed.



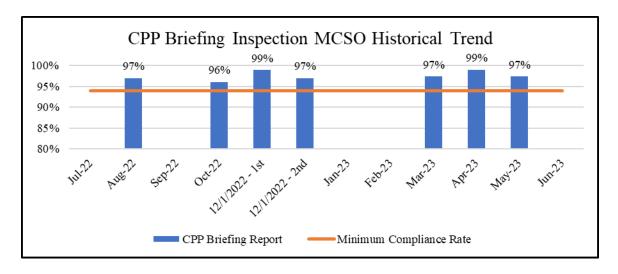
Semi Annual Bias-Free Reinforcement Inspection

The Semi-Annual Bias-Free Reinforcement Inspection is conducted to ensure compliance by Sworn, Detention, Civilian, Reserve, and Posse personnel with the requirements of MCSO Policy CP-8 to unequivocally and consistently reinforce that biased-based profiling or discriminatory policing are unacceptable. It is important that all supervisors unequivocally reinforce to their subordinates that discriminatory policing is unacceptable through documentation in Blue Team Supervisor Note entries or Briefing Note entries in accordance with MCSO Policy as well as HUB Training requirements outlined in Administrative Broadcast 21-71.



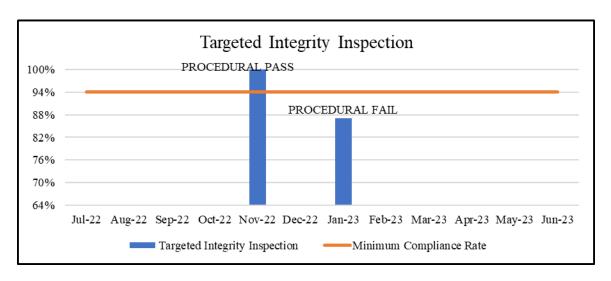
Constitutional Policing Plan Briefing Inspection

The Constitutional Policing Plan ("CPP") Briefing Inspection is conducted to ensure that CPP Roll Call briefings are being conducted. The purpose of the inspection is to ensure compliance with the CPP, MCSO Policy and to promote proper supervision. Seven inspections were completed during this annual reporting timeframe period, in August, October, and December 2022 (2 inspections), and March, April, and May 2023.



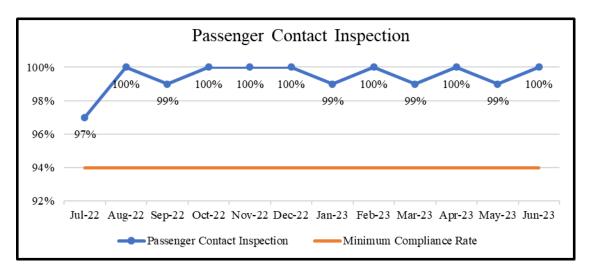
Targeted Integrity Inspection

The AIU conducts Targeted Integrity Inspections on an as-needed basis to examine specific employees, or a group of employees, who has or have been identified through an analysis conducted by BIO, PSB, EIS, or through other data collection methods, as displaying indications of, or concerns regarding, potentially improper or illegal behavior. All documents are inspected for adherence to MCSO Policies EB-1, *Traffic Enforcement, Violator Contacts, and Citation Issuance*, EB-2, *Traffic Stop Data Collection*, GJ-35, *Body-Worn Camera*, and Section 303 of the AIU Operations Manual. AIU conducted 2 inspections during this annual reporting period, in November 2022 and January 2023. The November targeted inspection reviewed traffic stops by a deputy to determine if appropriate law enforcement action was being taken and determine if there were indicators of improper decision making. The November inspection resulted in a "Procedural Pass." The second targeted test inspected deputy usage of BWC for compliance with policy. AIU determined that the disposition for the second inspection in January was a "Procedural Fail," meaning that the behavior did not comply with MCSO Policy but did not constitute criminal or serious misconduct.



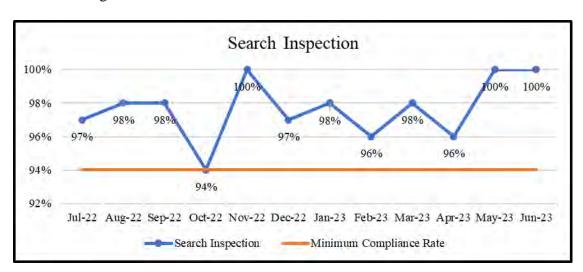
Passenger Contact Inspection

The AIU conducts Passenger Contact Inspections monthly to ensure proper supervision, adherence with MCSO policies, compliance with the Court's Order and local and federal law. A total of 35 traffic stops are selected each month for review. To accomplish this inspection, TraCS data is examined for those traffic stops with passenger contact documented on the Vehicle Stop Contact Forms. The inspector analyzes the Vehicle Stop Contact Form, Citation/Warning, Incidental Contact Receipt, CAD printout, JWI Printout (if applicable) AIU-designed Matrix, Inspection Report Template Form, and Body Worn Camera footage files.



Search Inspection

The AIU conducts Search Inspections on a monthly basis to ensure proper supervision, adherence with MCSO Policies, compliance with the Court's Order and established local and federal law. A total of 35 traffic stops are selected each month for review. To accomplish this inspection, TraCS data is examined for those traffic stops with a search documented on the Vehicle Stop Contact Forms. The inspector analyzes the Vehicle Stop Contact Form, Citation/Warning, Incidental Contact Receipt, CAD printout, JWI Printout (if applicable) AIU-designed Matrix, Inspection Report Template Form, and Body Worn Camera footage files.



Traffic Stop Data Inspections

During this reporting period, the BIO conducted twelve traffic stop-related inspections to comply with the Court's Order, Paragraph 64. Information about these inspections is in the chapter on Traffic Stop Documentation and Data Collection and Review.

In an effort to provide the public with current information about the audits and compliance inspections conducted by MCSO, updates are made to the BIO website on a routine basis to meet the requirements of the Court's Order. All audits and compliance inspections; the current MCSO Office Policy GH-4; *Bureau of Internal Oversight Audits and Inspections*, the current MCSO Office Policy GH-5; *Early Identification System*, the BIO organizational chart; and contact information for BIO can be found on the BIO website: http://www.mcsobio.org.

ANNUAL POLICY ASSESSMENT

MCSO's Policy Development Section consists of 10 employees who are responsible for reviewing and revising Office Policies. Its staff includes (1) section commander, (1) detention sergeant, (1) sworn sergeant, (1) detention officer, and (6) management analysts. The Administrative Services Division Director oversees the Policy Development Section.

All MCSO Policies go through a six-stage process during the review and revision period. These stages consist of review, staff, advance, approval, publication, and electronic distribution. In the review phase, the policy database, MCSO Policy files, and MCSO publications are reviewed for inclusion, if necessary, within a policy. In addition, input is received from subject matter experts in the affected areas of MCSO. Each Policy is reviewed for proper grammar, sentence structure, and formatting. Policies related to the Court's Orders are subjected to additional review and approval by the Monitor. The CAB may also play a part in the review of policies by providing recommendations. Once a policy has been finalized, approval is needed from the Policy Development Section chain of command, Executive Chiefs, and the Chief Deputy or designee.

MCSO continually reviews its Office Policies and Procedures as required by the Court's Orders. MCSO is committed to ensuring that its policies reflect its commitment to equal protection under the law and bias-free policing. To ensure compliance with the Court's Orders, MCSO continues to comprehensively review all patrol operations policies and procedures.

MCSO's Training Division utilizes TheHUB system to distribute Office Policies and Procedures and requires attestation of all Briefing Boards and published Office Policies. TheHUB system memorializes and tracks employee compliance with MCSO Policy and Procedures. Employees also acknowledge they understand and shall abide by the requirements of Office Policies and Procedures through the TheHUB. MCSO provides the Critical, Detention, Enforcement, and General Policies through TheHUB as a resource for all MCSO personnel.

During this fiscal year, the Policy Development Section reviewed approximately 209 MCSO Office Policies in preparation for revision, continued with its annual review of all Critical Policies, and published 53 Briefing Boards and 98 Administrative Broadcasts.

More specifically, the Policy Development Section reviewed, revised, and published 26 Office Policies related to the Court's Orders. These Office Policies, listed in Table 1 below, were reviewed and approved by the Monitor.

TABLE 1: DISSEMINATION OF COURT ORDER RELATED POLICIES FOR 2022/2023

Dissemination of Court Order Related Policies			
Policy No.	Policy Name	Published Date	
CP-2	Code of Conduct	02/13/2023	
CP-5	Truthfulness	11/16/2022	
CP-8	Preventing Racial and Other Bias-Based Profiling	10/12/2022	
EB-1	Traffic Enforcement, Violator Contacts, and Citation Issuance	06/14/2023	
EB-2	Traffic Stop Data Collection	02/21/2023	
EB-7	Traffic Control and Services	05/18/2023	
GC-4	Detention/Civilian Employee Performance Appraisals	04/12/2023	
GC-4(S)	Sworn Employee Performance Appraisals and Management	04/12/2023	
GC-7	Transfer of Personnel	06/14/2023	
GC-11	Employee Probationary Periods, Unclassified Employees, and Releases	05/01/2023	
GC-12	Hiring and Promotional Procedures	11/16/2022	
GC-13	Awards	02/13/2023	
GC-17	Employee Disciplinary Procedures	11/16/2022	
GE-3	Property Management and Evidence Control	06/19/2023	
GE-4	Use, Assignment, and Operation of Vehicles	02/21/2023	
GF-5	Incident Report Guidelines	06/14/2023	
GG-1	Peace Officer Training Administration	11/16/2022	
GG-2	Detention/Civilian Training Administration	11/16/2022	
GH-2	Internal Investigations	10/24/2022	
GH-5	Early Identification System	03/27/2023	
GJ-2	Critical Incident Response	10/24/2022	
GJ-5	Crime Scene Management	03/15/2023	
GJ-26	Sheriff's Reserve Deputy Program	03/15/2023	
GJ-27	Sheriff's Posse Program	05/18/2023	
GJ-35	Body-Worn Cameras	05/18/2023	
GJ-36	Use Of Digital Recording Devices (Non Body-Worn Cameras)	05/18/2023	

The Policy Development Section also completed a Statement of Annual Review (SOAR) for the following Policies requiring no changes during this year. The SOARs listed in Table 2 below were acknowledged and approved by the Monitor.

TABLE 2: SOAR POLICIES FOR 2022/2023

SOAR Policies				
Policy No.	Policy Name	Approval Date		
CP-3	Workplace Professionalism	08/18/2022		
CP-11	Anti-Retaliation	07/29/2022		
EA-2	Covert Operations	09/21/2022		
EA-11	Arrest Procedures	09/21/2022		
ED-2	Covert Operations	12/21/2022		
ED-3	Review of Cases Declined for Prosecution	08/18/2022		
GA-1	Development of Written Orders	07/29/2022		
GC-16	Employee Grievance Procedures	07/29/2022		
GD-9	Litigation Initiation, Document Preservation, and Document Production Notices	07/29/2022		
GF-1	Criminal Justice Data Systems	09/21/2022		
GF-3,	Criminal History Record Information and Public Records	09/21/2022		
GH-4	Bureau of Internal Oversight	08/18/2022		
GI-1	Radio and Enforcement Communications Procedures	08/18/2022		
GI-5	Voiance Language Services	07/29/2022		
GI-7	Processing of Bias-Free Tips	08/18/2022		
GJ-2	Critical Incident Response	06/05/2023		
GJ-24	Community Relations and Youth Programs	06/07/2023		
GJ-33	Significant Operations	08/18/2022		
GM-1	Electronic Communication, Data and Voice Mail	09/21/2022		

In addition, during this fiscal year, the Policy Development Section continued to review and revise the order-related Policies listed in Table 3 below.

TABLE 3: ORDER RELATED POLICIES UNDER REVIEW/REVISION FOR 2022/2023

Order Related Policies Under Review/Revision			
Policy No.	Policy Name	Date Opened	
CP-2	Code of Conduct	06/24/2022	
CP-3	Workplace Professionalism	07/07/2022	
CP-5	Truthfulness	07/07/2022	
CP-8	Preventing Racial and Other Bias-Based Profiling	06/07/2022	
CP-11	Anti-Retaliation	07/07/2022	
EA-2	Patrol Vehicles	07/07/2022	
EA-3	Non-Traffic Contact	07/15/2019	
EA-11	Arrest Procedures	07/07/2022	

EB-1	Traffic Enforcement, Violator Contacts, and Citation Issuance	07/07/2022
EB-2	Traffic Stop Data Collection	07/01/2022
EB-7	Traffic Control and Services	05/09/2022
ED-2	Covert Operations	07/07/2022
ED-3	Review of Cases Declined for Prosecution	07/07/2022
GA-1	Development of Written Orders	07/07/2022
GB-2	Command Responsibility	07/27/2020
GC-4	Employee Performance Appraisals	06/24/2022
GC-4 (S)	Employee Performance Management	07/07/2022
GC-7	Transfer of Personnel	07/07/2022
GC-11	Employee Probationary Periods and Unclassified Employees	07/07/2022
GC-12	Hiring and Promotional Procedures	06/22/2022
GC-13	Awards	07/07/2022
GC-16	Employee Grievance Procedures	07/07/2022
GC-17	Employee Disciplinary Procedures	04/11/2022
GD-9	Litigation Initiation, Document Preservation, and Document Production Notices	07/07/2022
GE-3	Property Management and Evidence Control	07/07/2022
GE-4	Use, Assignment, and Operation of Vehicles	07/07/2022
GF-1	Criminal Justice Data Systems	07/07/2022
GF-3	Criminal History Record Information and Public Records	07/07/2022
GF-5	Incident Report Guidelines	07/07/2022
GG-1	Peace Officer Training Administration	07/07/2022
GG-2	Detention/Civilian Training Administration	07/07/2022
GH-2	Internal Investigations	11/21/2022
GH-4	Bureau of Internal Oversight Audits and Inspections	07/07/2022
GH-5	Early Identification System	07/07/2022
GI-1	Radio and Enforcement Communications Procedures	04/12/2022
GI-5	Voiance Language Services	07/07/2022
GI-7	Processing of Bias Free Tips	07/07/2022
GJ-2	Critical Incident Response	11/21/2022
GJ-3	Search and Seizure	07/07/2022
GJ-5	Crime Scene Management	07/07/2022
GJ-24	Community Relations and Youth Programs	07/07/2022
GJ-26	Sheriff's Reserve Deputy Program	04/11/2022
GJ-27	Sheriff's Posse Program	03/14/2022
GJ-33	Significant Operations	07/07/2022
GJ-35	Body-Worn Cameras	05/24/2022

GJ-36	Use of Digital Recording Devices (Non Body-Worn Cameras)	04/11/2022
GM-1	Electronic Communications, Data and Voicemail	07/07/2022

The Community Advisory Board (CAB) had access to the Policies below on the MCSO website for input/recommendations throughout this fiscal year. The Policies were separated by each quarter for input/and recommendations and are listed in Table 4 below.

TABLE 4: POLICIES FOR CAB INPUT/RECOMMENDATIONS FOR 2022/2023

Policies for CAB input/recommendations			
Policy No.	Policy Name	CAB Quarterly Review	
CP-2	Code of Conduct	07/01/2022	
CP-8	Preventing Racial and Other Bias-Based Profiling	07/01/2022	
CP-11	Anti-Retaliation	07/01/2022	
EA-3	Non-Traffic Contact	10/01/2022	
EA-11	Arrest Procedures	10/01/2022	
EB-1	Traffic Enforcement, Violator Contacts, and Citation Issuance	10/01/2022	
GC-13	Awards	01/01/2023	
GH-2	Internal Investigations	01/01/2023	
GI-5	Voiance Language Services	01/01/2023	
GI-7	Processing of Bias-Free Tips	04/01/2023	
GJ-24	Community Relations and Youth Programs	04/01/2023	

A Briefing Board is an official informational publication used by MCSO to announce revised, time-sensitive changes to Office Policy. A Briefing Board has the same force and effect as written Office Policy. During this reporting period, the Policy Development Section published 21 Court Order related Briefing Boards.

The Briefing Boards listed in Table 5 below were published during this fiscal year.

TABLE 5: MCSO BRIEFING BOARDS FOR 2022/2023

MCSO Briefing Boards			
BB No.	Subject	Date Issued	
BB 22-46	Immediate Policy Change CP-5, Truthfulness, GH-2, Internal Investigations, GH-3, Polygraph Procedures and Documents, GC-17, Employee Disciplinary Procedures	09/19/2022	
BB 22-52	Immediate Policy Change	10/03/2022	

	GJ-5, Crime Scene Management	
BB 22-55	Policy Revision CP-8, Preventing Racial and Other Bias-Based Profiling	10/12/2022
BB-22-56	Policy Revision GH-2, Internal Investigations, GJ-2, Critical Incident Response and the Critical Incident Investigation Protocol, GJ-11, Serious Diagnosed Illness, Serious Physical Injury or Death of a Prisoner or Inmate	10/24/2022
BB 22-58	Policy Revision GC-12, Hiring and Promotional Procedures, GC-17, Employee Disciplinary Procedures, GG-1, Peace Officer Training Administration, and GG-2, Detention/ Civilian Training Administration	11/16/2022
BB 22-59	Policy Revision CP-5, Truthfulness	11/16/2022
BB 22-63	Immediate Policy Change GC-20, Uniform Specifications, GJ-27 Sheriff's Posse Program	12/05/2022
BB 22-64	Special Briefing Board - Information Every Employee Needs To Know	12/07/2022
BB 23-04	Policy Revisions CP-2, Code of Conduct, GC-13, Awards	02/13/2023
BB 23-05	Policy Revision GE-4, Use, Operation, and Assignment of Vehicles	02/21/2023
BB 23-06	Policy Revision EB-2, Traffic Stop Data Collection	02/21/2023
BB 23-09	Policy Revisions GJ-5, Crime Scene Management GJ-26, Sheriff's Reserve Deputy Program	03/15/2023
BB 23-10	Policy Revision GH-5, Early Identification System	03/27/2023
BB 23-12	Immediate Policy Change GB-2, Command Responsibility	04/03/2023
BB 23-14	Policy Revision GC-4, Detention/Civilian Employee Performance Appraisals GC-4(S), Sworn Employee Performance Appraisals and Management	04/12/2023
BB 23-17	Policy Revision GC-11, Employee Probationary Periods, Unclassified Employees, and Releases	05/01/2023
BB 23-18	Policy Revisions GJ-27, Sheriff's Posse Program	05/18/2023

BB 23-19	GJ-35, Body-Worn Cameras GJ-36, Use of Digital Recording Devices (Non Body-Worn Cameras) Policy Revisions EB-7, Traffic Control Services	05/18/2023
BB 23-23	Policy Revisions GC-7, Transfer of Personnel, GF-5, Incident Report Guidelines	06/14/2023
BB 23-24	Policy Revisions EB-1, Traffic Enforcement, Violator Contacts, and Citation Issuance	06/14/2023
BB 23-25	Policy Revisions GE-3, Property Management and Evidence Control	06/19/2023

Further explanation of the Briefing Boards and Administrative Broadcasts published during this reporting period can be found in MCSO's quarterly reports, which are available on the MCSO website.

Work in other MCSO sections also contributes to improving MCSO Policies. In this reporting period, for example, BIO completed a study of non-traffic stop forms, and that study will inform changes to relevant policies. Similarly, the traffic studies, described elsewhere in this report, can inform policy improvements. During this year, the Policy Development Section also worked with PSB to help develop recommended policies regarding administrative complaints as part of the effort to comply with the Third Order.

The Policy Development Section will continue to review all patrol operations policies and procedures and make appropriate amendments to ensure they reflect the Court's Order and remain current with professional standards and the laws of the State of Arizona and the United States Constitution.

PRE-PLANNED OPERATIONS

Paragraph 36 of the Court's Orders require that MCSO develop a written protocol including a statement of operational motivations and objectives, parameters for supporting documentation, operational plans, and instructions for supervisors, deputies, and posse members for any Significant Operation or Patrol involving 10 or more MCSO personnel. To comply with Paragraph 36, MCSO developed and disseminated Office Policy GJ-33, *Significant Operations*. GJ-33 includes protocol templates and instructions for Significant Operations and Patrols as the Court's Orders direct.

MCSO did not conduct any Significant Operations during this reporting period.

MCSO has been in Phase 1 and Phase 2 compliance with the requirements of the Court's Orders regarding Pre-Planned Operations (Paragraphs 35-40) since December 31, 2014. It is in Full and Effective Compliance with these requirements.

TRAINING

The MCSO Training Division recognizes the importance of consistent and impactful training delivered in accordance with the Court's Orders and with the goal of obtaining Full and Effective Compliance. The Training Division delivers several Court Order-related courses with these goals in mind.

In order to accomplish the goal of compliance, the Training Division continues to evaluate its current courses to determine the areas that can be improved upon, as well as taking appropriate steps to shift the direction of other courses for a sustainable and long-term training plan. MCSO has made changes to meet industry standards and to incorporate Monitor and Party recommendations.

The First Order requires MCSO to develop three types of training: (1) Bias-Free Policing consistent with Paragraphs 48 and 49; (2) Detentions, Arrests, and Immigration-Related Laws consistent with Paragraphs 50 and 51; and (3) Supervisor and Command Level Training consistent with Paragraphs 52 and 53. The Second Order requires MCSO to develop additional misconduct related training and misconduct investigations training for supervisors consistent with Paragraphs 178-182. Training is also an important part of the Constitutional Policing Plan ("CPP") which consists of nine goals that support the goals of the Court's Orders.

Beginning in January 2023, the Training Division modified the delivery schedule of the CPP Captain's Meetings and Roll Call Briefings for sworn personnel in order to alleviate the overlapping of the CPP briefings. The new schedule has been a success with compliance on all disseminated briefings to date.

Below is an overview of the work on Court-Order related training this fiscal year:

Supervisor Responsibilities: Effective Law Enforcement (SRELE) – For 2022 the Train-The-Trainer was held on October 14, 2022, and all sessions were completed by November 03, 2022.

Annual Combined Training (ACT) – Classes for the 2022 ACT were held throughout the third quarter of 2022 with one make-up class available on October 31, 2022. All classes were completed. For the 2023 ACT, the 4th and 14th Amendment portions were developed in conjunction with a local attorney and completed legal review with MCAO. On June 12, 2023, the materials were submitted to the Monitoring Team and Parties for review.

PSB-8 Internal – The 2022 PSB-8 Internal class for all investigative personnel assigned to PSB was delivered on August 31, 2022.

PSB-8 External - The 2022 PSB-8 External Training course for all supervisors who may investigate employee misconduct was submitted for Monitoring Team and Party review on October 12, 2022, with approval received on December 5, 2022. Classes were delivered and completed. The 2023 PSB-8 is being developed and will be delivered by the end of the calendar year.

CPP training -- The CPP training program of the Captain's Meetings and Roll Call Briefings underwent a thorough and detailed review during the first two quarters of 2023 and several opportunities to improve were identified in relation to the briefing topics. To continue to improve the quality of trainings, the Training Division proposed that CPP trainings be shifted in the direction of topics taken from the TSQRs

and TSARs. The change in CPP briefings and trainings with topics derived from the TSQRs and TSARs will provide MCSO personnel with real-time training in those areas identified by reports generated by the Office. The Monitor and parties were briefed on these changes during a June 29, 2023 meeting, and MCSO was authorized to move forward with the proposed change.

A summary of MCSO's Court-Ordered training for fiscal year 2022-23 is below.

FY 2023 MCSO CORT Training Summary:					
Course Title	Sessions Offered	Students Attended	Hours Completed		
2022 ACT	27	609	270		
Bias Free/4th & 14th	3	59	60		
EIS (10Hr)	3	59	30		
EPA	3	58	27		
2021 EEPM	2	28	8		
2022 EEPM	11	190	44		
2021 SRELE	1	23	5		
2022 SRELE	9	173	45		
Blue Team	12	86	24		
BWC	9	102	54		
TraCS	6	35	36		
TraCS for Sup	1	23	3		
PSB 40	3	43	120		
2022 PSB 8	6	165	48		
PSB Internal	1	52	8		
TOTAL	97	1705	782		

TRAFFIC STOP DOCUMENTATION AND DATA COLLECTION AND REVIEW

MCSO, with the assistance of the Office's research and analytical partner, CNA, conduct sophisticated analyses of MCSO's traffic stops and traffic stop data. CNA is an organization with over 75 years of experience helping federal, state, and local law enforcement agencies analyze and improve their organizations in a variety of areas. TSAU has seven graduate-level researchers who work with CNA to analyze traffic stop data. TSAU will eventually assume all responsibilities for collecting and analyzing traffic stop data as well as meeting other research needs of MCSO. Because the foundation for this analytical work is accurate traffic stop data, extensive work is done to ensure the quality of this data set.

MCSO works closely with the Monitoring Team and the Parties, in particular experts in statistics for the Monitor and the Parties. In this fiscal year, the traffic stop analyses includes monthly, quarterly, and annual traffic stop studies, each of which has a different focus.

With these studies in addition to other policies, procedures, and training, MCSO is at the forefront of addressing racial disparities in policing. Since the Court entered its First Order in 2013, MCSO has worked closely with the Monitoring Team and Parties to transform a previously unusable data collection into a comprehensive, computerized database with ongoing improvement and oversight. This change took considerable time, effort and resources and has provided the foundation for sophisticated analytics required to measure disparate outcomes.

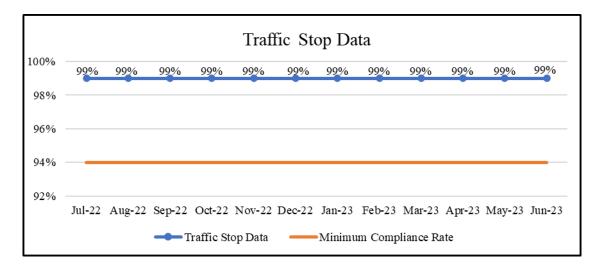
In addition, the analytic methods used in MCSO's reports were just beginning to be used to measure racial and ethnic disparities in law enforcement when the First Order was issued. MCSO now has the data and analytic skills to conduct analyses that can identify disparities and inform decisions regarding strategies to reduce disparities. The Court's Orders do not require elimination of all statistical disparities in traffic stop outcomes. They do, however, require that MCSO continue to identify evidence of potential bias and take appropriate action when it is identified.

Monthly Traffic Stop Data Inspections

During this reporting period, the BIO conducted twelve traffic stop-related inspections to comply with the Court's Order, Paragraph 64. The Monitor chose a random sample of traffic stops for each inspection. The inspections comply with MCSO Policies EB-1, *Traffic Enforcement, Violator Contacts, and Citations Issuance*, and EB-2, *Traffic Stop Data Collection*; and is consistent with the Court's Order, Paragraphs 54 a-m, 55, 56, and 57. Respective division commanders received BIO Action Forms for any deficiencies identified.

- During the third quarter of 2022, the overall compliance rate for the quarter was 99%. June's, August's, and September's compliance rates were 99%.
- The fourth quarter of 2022 had an overall compliance rate of 99%. The monthly compliance rates were 99% for October, November, and December.
- The first quarter of 2023 had an overall compliance rate of 99%. The monthly compliance rates were 99% for January, February, and March.

• The second quarter of 2023 had an overall compliance rate of 99%. The monthly compliance rates were 99% for April, May, and June.



TSMR

One of the most important functions of TSAU is the TSMR, a data-driven program designed to analyze traffic stop data on a monthly basis and intervene with deputies who show warning signs or potential indicia of bias-based policing. This ongoing work includes a statistical analysis each month as well an initial vetting of those results and, if necessary, an exhaustive qualitative review of traffic stop forms, data not utilized in the statistical analysis, and body worn cameras to determine if an intervention is necessary. The Monitoring Team has been actively involved in all of those decisions and has thus far agreed that MCSO is appropriately implementing the approved process.

TSAU worked tirelessly to refine and implement the approved methodology for the TSMR. The approved methodology analyzes the traffic stop enforcement behavior of all patrol deputies over a rolling 12-month period. The analysis is designed to identify deputies whose traffic stop outcomes are racially or ethnically disparate from their peers on five benchmarks: stop length, citation rate, search rate, arrest rate, and seizure rate. During this annual reporting period, TSAU completed the pilot TSMR program, and the fully implemented program began in October 2022.

Notably, none of the deputies who received interventions through the TSMR process were found to be racially profiling individuals, and none of the reviews completed in this fiscal year through this monthly process found any explicit bias.

TSQR

TSQRs focus on specific topics selected by MCSO and approved by the Monitor. The Monitor and the Parties have input into the methodology for each report, and Monitor approval of the methodology is required. MCSO produced four TSQRs over the last year:

- TSQR8: Disparities Over Time, published in September 2022. This report analyzed overall disparities observed using the TSAR 6 methodology on data collected from 2017-2021. While the results did not demonstrate a clear pattern of disparities increasing or decreasing over time, it was not wholly unexpected that significant reductions were not found as the available data for analysis covers a time period after the most impactful policy reforms targeting the practices that led to the Court's Orders were implemented. As a result, the measurement of change identified in this report likely underestimates the true impact of MCSO's reforms since the Court issued the First Order.
- TSQR9: 2021 Special Assignments, published in December 2022. The primary purpose of this study was to identify whether deputies' outcomes differ while on special assignment when compared to those same deputies' non-special assignment stops across the stop length, citation, and arrest benchmarks. The results indicate that special assignments are a valuable matching variable in the TSMR and TSAR analyses. Additionally, following this study, changes were made to the Vehicle Stop Contact Form ("VSCF") to increase the accuracy in the identification of special assignment stops.
- TSQR10: 2022 Searches, published in March 2023. This research had two primary goals. The first was to identify all search activity conducted during traffic stops by MCSO in 2022. The second was verifying the discretionary/non-discretionary coding of searches used in the TSAR/TSMR. Findings from this study align with previous research in the TSAR identifying search activity. Of the 490 stops with searches in 2022, approximately 80 percent (392 stops) had non-discretionary searches (stops with driver searches incident to arrest, vehicle inventory searches, or both). The remaining 20 percent of stops with searches (98 stops) included discretionary searches. Discretionary searches by MCSO occurred during less than 0.50 percent of all traffic stops in 2022. As a result of this study, MCSO made some changes to its operations, namely the modifications to the VSCF search options in an attempt to mitigate any errors the analytic syntax for the TSMR and TSAR may make in determining the discretionary/non-discretionary nature of search options.
- TSQR11: 2022 Low Stop Volume Deputies, published in June 2023. The research presented in this report examined whether the activity of these low-volume deputies was characteristically different from that of deputies who make twenty or more traffic stops in a year. Low-volume deputies had no statistically significant disparities in traffic stop outcomes or stop length between white and Hispanic drivers, and these results were not significantly different from the disparities exhibited by the high-volume deputies.

The Monitoring Team and Parties have agreed on the topic for the 12th quarterly report, which is an analysis of disparities both within and between each district.

TSAR

The MCSO worked with the Monitoring Team, the Parties, and CNA to refine the TSAR methodology for the eighth TSAR. TSAR 8 was published during the second quarter of 2023, and analyzed traffic stop data for calendar year 2022. The TSAR analyzes patterns of patrol activity within MCSO; it does not analyze individual deputies. It focuses on five benchmarks: stop length, search rates, citation rates, arrest

rates, and seizure rates. There were a total of 19,787 traffic stops in 2022 that were studied in this report. This year's report had the fewest statistically significant findings of disparity across all the benchmarks of any TSAR to date. The TSAR is used to inform MCSO about disparities that exist and help inform action to reduce those disparities.

CPP

The traffic stop studies are an important part of the goals set in the CPP. In addition, MCSO has a survey to capture the community's perspective on how well MCSO is meeting procedural justice principles. The four principles of procedural justice covered by the survey include: (1) treating people with dignity and respect, (2) giving individuals voice during encounters, (3) being neutral and transparent in decision making, and (4) conveying trustworthiness. These anonymous surveys are available to any person subject to an MCSO traffic stop. The overall response to these surveys remains below .5%, indicating responses are not generalizable to all of the people who have been stopped by MCSO deputies. Most survey responses, however, have been favorable. The least favorable responses have been from people who were not actually subject to a traffic stop but were issued a citation following a traffic accident. In this fiscal year, MCSO examined strategies to increase responses to the survey and implemented some related changes.

As a result of the Court's Orders, MCSO has comprehensive information, training and policies to combat biased policing. Although traffic stop studies still show disparate outcomes, MCSO continues to review its training and other issues that may reduce those disparities.

All of the traffic stop studies are available for public review on the MCSO website.

EARLY IDENTIFICATION SYSTEM (EIS)

The Early Identification System ("EIS") is designed to assist supervisors with consistently evaluating employees, conducting performance evaluations, identifying outstanding employee performance, identifying those whose performance warrants further review, intervention, and when appropriate, a referral to the PSB for alleged misconduct. MCSO uses data from the EIS to support effective supervision, evaluation, and management of employees to promote lawful, ethical, and professional police practices; to identify behavior that represents a risk to the employee, community, or the Office; and to evaluate Office operating procedures.

The Early Intervention Unit ("EIU") was created to assist in identifying employees who may exhibit problematic behaviors that, if addressed and corrected, may assist employees in continuing to function in an efficient and productive manner. In addition, the EIU supports the effective supervision and management of employees, including the identification of and response to potentially problematic behaviors, including racial profiling and unlawful detentions and arrests.

The EIU is responsible for administration of the EIS along with development and updates of Office Policy GH-5, *Early Identification System*. EIU has continuously worked to revise, update and develop sections of the BIO/EIU Operations Manual, and create training courses which provide procedures and effective resources for the EIS.

EIU command regularly works with personnel from the CID, PSB, Training, Administrative Services Division, MCSO Human Resources, MCSO Technology Bureau, and the Policy Development Section to achieve shared goals related to the EIS. Additional assistance is provided by outside vendors CNA and CI Technologies.

During this fiscal year, the IA Pro system triggered 698 alerts. EIU forwarded 223 alerts to supervisors for further review and processed and quality-assured the following:

INCIDENT TYPE	July/Sept 2022	Oct/Dec 2022	Jan/Mar 2023	Apr/Jun 2023	TOTALS
Academy Notes	15	31	46	65	157
Award Recipient	179	36	41	111	367
Briefing Notes	204	187	139	138	668
Coaching	26	22	37	35	120
Commendation	142	132	165	117	556
Critical Incident	20	1	0	1	22
Data Validation	10	51	16	16	93
E I S Action	31	30	82	3	146
EIS Alert	45	47	87	45	224
Employee reported activity	119	87	93	91	390
Firearm discharge	4	2	4	4	14
Forced entry	4	2	1	6	13

INCIDENT TYPE	July/Sept 2022	Oct/Dec 2022	Jan/Mar 2023	Apr/Jun 2023	TOTALS
Higher Award Nomination	24	19	20	1	64
IR Memorialization	8	2	1	0	11
Line Level Inspection	516	441	616	575	2148
MCAO Further Notice	68	57	65	72	262
MCAO Turndown Notice	180	135	105	102	522
Minor Award Nomination	32	21	0	1	54
Performance Assessment Measure	147	132	114	122	515
Supervisor Notes	12093	11986	11823	11781	47683
Vehicle accident	32	37	27	22	118
Vehicle pursuit	2	3	5	0	10
Total:	13901	13461	13487	13308	54157

During this reporting period, EIU has continued efforts to maintain the day-to-day basic functions of the EIS and utilize the system to its full potential while continually working to improve the EIS. Aside from the day-to-day maintenance of the EIS, there are numerous ongoing projects that further the EIU goal to improve efficiency and support effective supervision.

In Quarters 1 and 2 of 2023, the EIU sections of the BIO Operations Manual were approved for publication. Sections included were definitions, duties, the EIS Alert Process, the Threshold Analysis Review Process (TARP), equipment, Monitor Document Production Request, EIU personnel transfers, training, emergency procedures, and appendices A-G. The EIU Operations Manual is now complete and approved for publishing.

The EIU utilized the Threshold Analysis Review Process to expand the alert thresholds for vehicle pursuits and vehicle accidents in Quarter 2 of 2023. The analysis of the vehicle pursuit threshold concluded the current threshold of 2 in 12 months is appropriate. The threshold for vehicle accidents changed from an incident-based threshold to an allegation-based threshold, with an allegation of 2 preventable vehicle accidents in 24 months triggering an alert.

The EIU staff tested and planned for the update of Blue Team Nextgen which rolled out during the third quarter of 2022. The update was successful.

In Quarter 1 of 2023, MCSO updated the EIS for Supervisor training and submitted it for review. The Monitor reviewed and approved this training in Quarter 2 of 2023. The updated EIS training will continue to be utilized for Supervisor training of the EIS.

SUPERVISION AND EVALUATIONS OF DEPUTY PERFORMANCE

The Office's Human Resources Bureau continued the initiative to enhance supervisory effectiveness in managing and evaluating employee performance and compliance in fiscal year 2022-2023. Significant efforts towards this objective included the following:

- Continued configuration and testing of the NEOGOV Perform application for creating, tracking, and maintaining employee performance appraisals for sworn personnel under MCSO Policy GC-4(S), Sworn Employee Performance Appraisals and Management.
- Implementing daily integration of data files from the County's new Workday HRIS system in concert with the Office's IT Bureau, Maricopa County's Office of Enterprise Technology, and the vendor for the Perform application (NEOGOV). This effort was made significantly more challenging by the County's decision to delay the Workday go-live date originally set for the spring of 2022 until September 18, 2022, as it left little time for final configuration and testing before training supervisors on the Perform application which was to begin in mid-October. It was critical that the training and rollout of the Perform application not be delayed as it was scheduled to be delivered as supervisors would begin preparing to complete the first annual appraisals under the new policy.
- Developing the *Effective Employee Performance Management, Part 2* training program and presenting it to supervisors and managers of sworn employees. The curriculum built upon the concepts covered in part one of the training program and involved hands-on computer lab activities in which participants were required to demonstrate their ability to utilize features of the system, compose a suitable performance appraisal narrative for a core competency, and apply appropriate ratings. Additional activities associated with this effort included creating the following resources that were provided to attendees:
 - A detailed Perform Guide for sworn supervisors to accompany the training class and to serve as a reference for using the Perform application.
 - Employee performance appraisal checklists for sworn supervisors to aid those creating or approving performance appraisals in ensuring the requirements of the Court's Orders and Office policy are addressed.
 - Quick Reference guides for sworn employees and supervisors to aid in use of the Perform system.
- Conducting internal audits of employee performance appraisals submitted in the Perform application in order to reinforce training and quality expectations. Appraisals of sworn personnel are audited by human resources analysts for compliance with MCSO Policy GC-4(S) and the Court's Orders, with feedback provided to individuals in the chain of command reviewing the EPA for approval.

MISCONDUCT AND COMPLAINTS

PSB continued to experience an influx of complaints, contributing to a significant backlog of investigations and challenges of extended timeframes to complete investigations. PSB continued to address these factors prior to and following the issuance of the Third Order by implementing the following:

- Hiring additional qualified civilian investigators to assist with administrative investigations.
- Hiring additional administrative staff members to provide case and administrative support to investigators.
- Further refinement of processes to enhance efficiency of operations within PSB by identifying top priority tasks. PSB completed five top priority goals:
 - o The refinement of an enhanced case processing tracking mechanism via the electronic database;
 - o The completion/elimination of the backlog of cases delayed in the review stage(s);
 - The restructure/reorganization of staff responsibilities and assignments to maximize investigative capabilities;
 - o Hiring/recruitment/solicitation to fill positions that have become vacant due to retirements or resignations; and
 - o Refinement of the PSB diversion process to ensure appropriate review and documentation is completed for incidents that qualify for a diversion in lieu of a full administrative investigation.
- Refinement of the complaint intake process to more efficiently review, categorize, and identify complaints that (a) do not involve allegations of misconduct; (b) are more appropriately handled via a supervisory intervention; and (c) are more appropriately handled through the "fast track" investigative process established during this reporting period.
- Implementing a "fast track" investigative process to strategically investigate qualifying cases in accordance with the Court's Orders but with a streamlined approach. This approach utilizes a small subset of PSB investigators combined with a strategic investigative plan resulting in the completion of these cases under the mandated investigative timelines.
- Utilizing a protocol for streamlining investigations and reducing unnecessary witness interviews, such as where evidence demonstrates clearly that misconduct either did or did not occur.
- Utilizing a protocol of offering in-person interviews of external complainants, witnesses, and investigative leads, but, when appropriate, conducting interviews over the phone to expedite information gathering.
- Continuing to evaluate the utilization/assistance of the Employee Retention and Performance Division under the Human Resources Bureau to identify matters that can be appropriately addressed through Human Resource consultations by PSB investigators.

• Contracting with an outside vendor to expand the number of contract investigators to assist with the current backlog of administrative investigations.

With respect to investigative timeframes for administrative investigations completed by MCSO during this reporting period, the timeframe for investigative completion has continued in an overall downward trend. When analyzing the entire fiscal year, the median number of days to complete administrative investigations was 216 calendar days.

PSB continued to publish on its website the Semi-Annual Public Report of Misconduct (as required by Paragraph 251 of the Court's Orders) and monthly website summaries of completed investigations (as required by Paragraph 252).

To ensure that MCSO's actions comply with the Court's Orders and the high standards MCSO expects, MCSO continued with a multi-step approach to address misconduct and complaints.

- PSB continues to require all division-level investigations to be reviewed by the respective Bureau Commander prior to submission to the PSB for review. This promotes an additional level of review, accountability, and mentorship by the immediate chain of command of those involved in conducting the investigations to improve the quality and timeliness of the investigations conducted.
- PSB reviews and provides feedback to division-level investigators and their chains of command to improve the thoroughness of the investigations, obtain structure and consistency in format, ensure the inclusion of proper forms, and aid with future investigations. The intent of the feedback is to evaluate, educate, assist, and provide suggestions for future division level investigations. PSB also documents the reviews and tracks investigative deficiencies, pursuant to Paragraph 211 to further assist the organization in achieving compliance.

PSB also initiated a process to revise Office Policies GH-2, *Internal Investigations* and GJ-2, *Critical Incident Response*, to enhance efficiency and consistency in evaluating incidents such as inmate deaths that do not include allegations of employee misconduct. MCSO submitted the revised policies that were approved and published during this fiscal year.

Paragraph 275 of the Second Order gives the Monitor authority to supervise and direct all administrative investigations pertaining to Class Remedial Matters ("CRMs"). PSB continued to meet with the Monitoring Team to determine and establish protocols on how to proceed with the reporting, investigation, and review of CRM investigations (Paragraph 278). The PSB Commander continues to meet regularly with members of the Monitoring Team to review and discuss CRM investigations and subsequent discipline in sustained investigations.

Below are additional statistics regarding misconduct cases this fiscal year:

• Consistent with Paragraph 102, MCSO mandates that any internal or external misconduct allegations must be reported to PSB. Whenever misconduct is alleged, PSB must assign an IA case number. During this annual reporting period, PSB assigned 665 IA case numbers and completed

and closed 575 IA cases. PSB assigned 24 CIA (criminal) cases and closed 25 CIA cases. PSB also assigned 21 critical incidents and closed 11 critical incidents.

- PSB received 278 internal complaints, and of these, 266 were administrative investigations and 12 were criminal investigations. Additionally, PSB received 311 service complaints.
- Consistent with Paragraph 32, requiring that all patrol operations personnel report violations of policy, during this reporting period, PSB received 258 complaints from patrol personnel.
- Personnel alleged to have engaged in discriminatory policing are subject to administrative investigation and discipline. During this reporting period, PSB received 36 complaints and completed 19 investigations alleging discriminatory policing.
- As required by the Court's Orders (Paragraphs 90, 91, and 249), PSB tracks allegations of unlawful stops, searches and seizures, or arrests as a separate category of misconduct. During this reporting period PSB received 10 complaints and completed 5 investigations alleging unlawful stops, searches, seizures, or arrests.
- As required by Paragraph 24 of the Court's Orders, MCSO responds to hotline complaints. During this reporting period the PSB received one complaint via the PSB hotline.

On November 8, 2022, the Court issued the Third Order pertaining primarily to PSB Operations. The Third Order expanded the authority of the Monitor with the goal of reducing the backlog of administrative investigations within MCSO.¹ The backlog of administrative investigations on November 8, 2022, was identified as 2,136 cases. Through the continued implementation of the previously mentioned processes, at the end of this reporting period, MCSO had reduced the backlog to 1,842 cases, an approximate reduction of 14%.

The Third Order established staffing requirements within PSB. MCSO filled all investigator positions prior to the Court-imposed deadline. MCSO expanded the staffing within PSB to exceed the Third Order's minimum staff requirements with 44 investigators at the end of this reporting period. This excluded the 10 private contract investigators MCSO currently utilizes to assist with investigations. PSB's total overall staffing at the end of this reporting period included 73 personnel.

Under the Third Order, the Monitor has the independent authority to make the ultimate decision pertaining to initial intake and routing of complaints. The PSB Commander meets, on average, once a week with the Monitoring Team to review all initial intake and routing decisions pertaining to complaints.

The Third Order also required certain policy changes. MCSO conferred with the Parties on these issues and drafted and submitted updated policies, procedures, and documentation related to various administrative investigation procedures for consideration. The Monitor's proposed policy changes authorized by the Third Order, and comments on those proposals from MCSO and the Parties, were submitted to the Court in March 2023 and are awaiting Court review and approval.

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MCSO appealed the Third Order's expansion of Monitor authority. That appeal is pending at the Ninth Circuit.

Additionally, MCSO commissioned an independent staffing study during this fiscal year. Although MCSO initiated its staffing study before the Third Order was issued, because the Third Order also required a staffing study, MCSO expanded the scope of work to comply with the Third Order requirements. That staffing study remains in process at the end of this reporting period.

PSB contracted with a subject matter expert to assist with providing specialized misconduct training to all investigators in the organization that conduct misconduct investigations. The training focused on strategies related to use of force investigations with a focus on use of force incidents involving persons already in custody. During this reporting period, the training was delivered to members of the Office currently conducting misconduct investigations as well as several candidates that may be considered for a future assignment where they would conduct misconduct investigations.

Finally, consistent with Paragraph 251(c) of the Court's Orders, in 2020 PSB created a survey to collect demographic information from its complainants to ensure that complainants are treated fairly and without bias. The survey is available online and in print format and sent to complainants upon closure of the investigation. During this fiscal year, PSB received 14 responses from the approximately 345 surveys that were sent out.

COMMUNITY ENGAGEMENT

Community Engagement is an area MCSO strives to promote with our civilian employees, Detention Officers, and Sworn Personnel. Deputies in the field are encouraged to develop positive relationships with community members and the local businesses we serve. In furtherance of the community activities and meetings we attend, the Community Outreach Division (COrD) is dedicated to building relationships and regaining the community's trust. This is not only a requirement of the Court's Orders but is also consistent with Sheriff Penzone's vision and values to improve and build relationships within the community in a non-law enforcement environment.

Each member of COrD has attended cultural sensitivity and diversity training to ensure they understand and respect the diverse backgrounds and perspectives of the community members they serve.

In January 2023, COrD was transferred from the Office of Special Programs Division to the Enforcement Support Division. The Enforcement Support Division provides community outreach efforts and a variety of support to all aspects of the Office. While each unit and program have specific purposes, the mission of the Enforcement Support Division is to ensure the safe operation and effective deployment of highly trained personnel and volunteers for the preservation of life, property, community education, and crime suppression, while partnering with community groups and local businesses as appropriate, with management and collaborative responsibilities specific to Office associated community advisory boards. The transition also included the MCSO Cadet Program.

MCSO's quarterly reports record community policing activities performed by MCSO Patrol Deputies across the county. During this fiscal year, the MCSO registered several hundred events, where combined public attendance exceeded thousands. During this same period, the MCSO also recorded numerous occasions of community policing utilizing the Computer Aided Dispatch System; those engagements totaled thousands of staff hours and are primarily attributed to the community policing activities of Patrol Deputies.

In all these endeavors, the MCSO puts forth the effort to build sustainable outreach programs, many of which are listed on the MCSO webpage. MCSO also utilizes social media to communicate and share information about events taking place within the community as well as about employees, public safety announcements, and recruitments.

There are many innovative programs that benefit community members, such as MCSO's liaison program with the Central American Consulates. This program has facilitated unprecedented access for the Consulate's staff to perform official duties and outreach within the jail system. In the past year, MCSO continued to develop these relationships, including close collaboration with the Mexican Consulate regarding the use of the Consular Identification Matriculas as a valid form of ID for traffic stops and involving members of the Guatemalan Consulate in MCSO's revived Community Academy, which resumed in October 2022.

Several community advisory boards have been created at the direction of Sheriff Penzone, in addition to the Court-ordered CAB. These community advisory boards advise the Sheriff on important matters that affect the community as well as being a voice to and for the communities they represent. Hispanic, African American and LGBTQ+ Advisory Boards are made up of Dreamers, businesspeople, activists, educators, and community leaders. Each person serving on the Sheriff's boards provides a unique perspective of the

community they represent. MCSO also continues to work with the CAB as it performs its role under the Court's Orders.

Due to increasing concerns over the use and prevalence of fentanyl, many of MCSO's community engagement efforts focused on the dangers of the drug. MCSO facilitated several presentations on the drug, presenting both to schools and broader community groups. These presentations included Spanish language presentations.

MCSO participated in many more activities in various school settings, both inside and outside MCSO's patrol areas, throughout the year. This included presentations to all age groups on topics ranging from K-9 demonstrations, career day presentations, summer camp activities, and presentations on the use of various drugs and substances.

COrD has developed various programs intended to engage young members of the community. This includes mentorship programs, youth academies, and sports activities. These have proven to build positive relationships and seized opportunities for constructive interactions. MCSO actively participated in cultural events and celebrations within the community to demonstrate support and foster a sense of unity in our continued efforts in developing trust and legitimacy.

As always, MCSO remains committed to charitable activities as well. Particularly in December 2022, MCSO participated in a wide range of activities in order to make the holiday season a little more special for those who otherwise would not have much opportunity to celebrate.

Many of these programs and events reach out to members of the Plaintiffs' class. The input COrD representatives receive at these events generally concerns issues related to the specific event, or perhaps jobs. They do not receive concerns about biased policing by MCSO or other *Melendres*-related issues. MCSO's Community Outreach programs help show the community that today's MCSO under Sheriff Penzone is committed to serving everyone.

As noted, MCSO's community engagement activities are reported in detail in its quarterly reports. The above highlights are just a sample of MCSO's dedication to engaging with its community.

COMPLIANCE COSTS

The financial costs associated with remedying the constitutional violations that led to the *Melendres* litigation are substantial. There are ongoing operational costs within MCSO, legal expenses, Monitor fees, and other costs that are paid by Maricopa County. For legal fees, Maricopa County pays its own expenses as well as the legal fees of the Plaintiffs because they prevailed in this civil rights lawsuit. Costs for this fiscal year, based on information available as of August 9, 2023, were \$33,469,777. Since 2008, Maricopa County's total costs related to the *Melendres* litigation and subsequent compliance efforts total approximately \$234,074,190. The largest categories of expenditures in this fiscal year and over the life of the case are described below, and more detail regarding costs is in Appendix C.

Largest Categories of Expenditures in FY 2023 and over Life of Case							
	Fiscal year 2023	Total through 2023					
MCSO Operational costs	\$29,976,542	\$176,769,276					
Monitor Fees	2,400,568	24,867,924					
Legal costs							
MCSO	421,956	9,320,912					
Plaintiffs	525,000	12,253,440					
Total legal costs	946,956	21,574,352					

CONCLUSION

Throughout fiscal year 2022-2023, MCSO continued to focus on its obligations under the Court's Orders. Ongoing training, policy review, audits, reports and other processes continued as required. The monthly traffic-stop report pilot was completed and is being fully implemented. Although completing administrative investigations in a timely manner remains a challenge, MCSO continues to work to address that issue along with other requirements of the Third Order by reviewing processes and making changes to enhance efficiency where it can. All these efforts are aimed at providing the policies, accountability, and culture that will comply with the Court's Orders and prevent the type of constitutional violations that led to this Court's Orders from reoccurring at MCSO.

APPENDIX A: MELENDRES COURT ORDERS COMPLIANCE CHART

Legend:

Phase 1 – Policies and Procedures

Phase 2 – Operation and Implementation

* Indicates Full and Effective Compliance as of the Monitor's 36th Report (requires minimum of 3 years of Phase 1 and Phase 2 compliance)

Para No.	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of Compliance
	34 Rep			oth oort		oth oort	37tl Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
First Order									
9*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2015
10*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2015
11*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2015
12*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
13*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
19*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/30/2018
21*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/30/2017
22	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2019
23*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
24*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2017
25	In Compliance	Deferred	In Compliance	Deferred	In Compliance	Deferred	Pending	Pending	9/30/2017
26*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2015
27*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2014
28*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
29*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
30*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
31*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2016
32	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
33	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
34*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2015
35*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
36*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
37*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
38*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
39*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017
40*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
42	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	9/30/2018

Para No.	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of Compliance
	34 Rep			oth Oort		oth Oort	37tl Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
43*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
44*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
45*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2016
46*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2016
47*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
48*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
49*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
50*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
51*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
52*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
53*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
54	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
55*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
56	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2021
57*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
58*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2016
59*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2015
60*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
61*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2016
62*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
63*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2016
64	Not In Compliance	Not In Compliance	Not In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
65	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
66*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2019
67	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
68*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
69	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2021
70	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
71*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
72	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
73*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
74	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/30/2019
75	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/30/2019
76*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
77*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2014
78*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017

Para No.	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of Compliance
	34 Rep			oort		oth port	37t Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
79	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
80*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2017
81	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
83*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
84*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2016
85*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
86*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
87	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
88*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
89*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2016
90	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017
91	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2020
92	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
93*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
94	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2021
95	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
96	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2021
97	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	In Compliance	Pending	Pending	
98	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
99	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	In Compliance	Pending	Pending	
100	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
101*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2015
102*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
103	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2020
104*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
105*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
106*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2015
109	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	9/30/2018
110	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	9/30/2018
111	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	9/30/2018
112	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	9/30/2018
113*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2018
114*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2018
115	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2018
116	In Compliance	Deferred	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2018

Para	07/01/0022	00/20/2022	10/01/2022	12/21/2022	01/01/0022	02/21/2022	04/01/2022	6/20/2022	Date of
No.	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Compliance
	34 Reg		35 Rej	ort		oort	37tl Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
117	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	9/30/2018
118	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	9/30/2018
2nd Order									
165	N/A	In Compliance	N/A	In Compliance	N/A	In Compliance	Pending	Pending	12/31/2021
167*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
168*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
169*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
170*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
171*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
172*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
173	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2018
174*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
175	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2020
176	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2020
177*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
178*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2017
179*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/30/2019
180*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017
181	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2017
182*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017
184*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2017
185*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
186*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
187*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
188*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
189*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
190*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2018
191*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
192*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
193*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
194	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
195	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
196*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
197*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
198*	N/A	In Compliance	N/A	In Compliance	N/A	In Compliance	Pending	Pending	6/30/2018
199*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017

Para	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of
No.	-								Compliance
	34 Rep			oth oort		oth oort	37tl Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
200*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017
201*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
202*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
203*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
204	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
205	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
206*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
207	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
208*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2017
209	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
210*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
211	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
212	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2018
213	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
214*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
215*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
216	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
217*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
218*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
220	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2020
221*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
222*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
223*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
224*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
225*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
226*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
227*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
228*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
229*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
230*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
231*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
232*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
233*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
234*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
235*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
236*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017

Para	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of Compliance
No.									Compilance
	34 Rep		35 Re _l	ith oort		6th port	37tl Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
238*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
239*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
240*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
241*	N/A	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2018
242*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2017
243*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
244*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2016
245*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2016
246*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	3/31/2018
247*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
248*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
249*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
250*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
251*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
252*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
253*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
254*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
255*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
256*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
257*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
258*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
259*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
260	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2020
261	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	
262	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	
264*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
265	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2021
266*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2016
267	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2021
268*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
269	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Deferred	Pending	Pending	12/31/2019
270	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Deferred	Pending	Pending	6/30/2019
271	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2018
272*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2017
273*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
276*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016

Para No.	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of Compliance
	34 Rep			ort		oth port	37tl Repo		
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
278*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
279*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
281	In Compliance	Not In Compliance	In Compliance	Not In Compliance	In Compliance	Not In Compliance	Pending	Pending	
282*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
284*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
286*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	12/31/2018
287*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
288	N/A	In Compliance	N/A	In Compliance	N/A	In Compliance	Pending	Pending	
289	N/A	N/A	N/A	N/A	N/A	N/A	Pending	Pending	
292*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	9/30/2016
300	N/A	Deferred	N/A	Deferred	N/A	Deferred	Pending	Pending	
337*	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	6/30/2017
3rd Order									
338			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
339			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
340			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
341			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
342			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
343			In Compliance	In Compliance	In Compliance	In Compliance	Pending	Pending	
344			N/A	Deferred	N/A	Deferred	Pending	Pending	
345			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
346			N/A	N/A	N/A	N/A	Pending	Pending	
347			N/A	N/A	N/A	N/A	Pending	Pending	
348			Deferred	Deferred	Deferred	Deferred	Pending	Pending	
349			N/A	N/A	N/A	N/A	Pending	Pending	
350			N/A	N/A	N/A	N/A	Pending	Pending	
351			N/A	N/A	N/A	N/A	Pending	Pending	
352			N/A	N/A	N/A	N/A	Pending	Pending	
353			Deferred	Deferred	Deferred	Deferred	Pending	Pending	
355			N/A	Deferred	N/A	Deferred	Pending	Pending	
356			N/A	N/A	N/A	N/A	Pending	Pending	
357			N/A	Deferred	N/A	Deferred	Pending	Pending	
360			N/A	N/A	N/A	N/A	Pending	Pending	
361			N/A	Deferred	N/A	Deferred	Pending	Pending	
362			N/A	Deferred	N/A	Deferred	Pending	Pending	
364			N/A	In Compliance	N/A	In Compliance	Pending	Pending	
365			Deferred	Deferred	Deferred	Deferred	Pending	Pending	

Para No.	07/01/2022-	09/30/2022	10/01/2022-	12/31/2022	01/01/2023-	03/31/2023	04/01/2023-	6/30/2023	Date of Compliance
	34	th	35	ith	36	óth	37tl		
	Rep	ort	Rep	oort	Rep	oort	Repo	ort	
	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	
368			N/A	In Compliance	N/A	In Compliance	Pending	Pending	

	Legend
	Phase 1 – Development of Policy and Procedures
	Phase 2 – Operation Implementation
,	*Full and Effective Compliance

APPENDIX B: LIST OF MCSO ACRONYMS

ACT: Annual Combined Training

AIU: Audits and Inspections Unit

BIO: Bureau of Internal Oversight

CAB: Community Advisory Board

CAD: Computer Aided Dispatch

CID: Court Implementation Division

CNA: CNA Analytics and Solutions

COrD: Community Outreach Division

CRM: Class Remedial Matter

EIS: Early Identification System

EIU: Early Intervention Unit

EPA: Employee Performance Appraisal

IR: Incident Report

MCAO: Maricopa County Attorney's Office

NTCF: Non-Traffic Contact Form

PSB: Professional Standards Bureau

RRU: Research Review Unit

SOAR: Statement of Annual Review

SRELE: Supervisor Responsibilities: Effective Law Enforcement

TraCS: Traffic and Criminal Software

VSCF: Vehicle Stop Contact Form

TSAR: Traffic Stop Annual Report

TSAU: Traffic Stop Analysis Unit

TSMR: Traffic Stop Monthly Report

TSQR: Traffic Stop Quarterly Report

VSCF: Vehicle Stop Contact Form

APPENDIX C: MELENDRES COMPLIANCE COSTS FY08 THROUGH FY23

Appendix C: Melendres Costs to Maricopa County FY 2008-2023

Plaintiff/Defense Counsel Costs	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Grand Total
Defense Legal Costs	8,332	324,985	397,528	337,547	122,558	212,415	342,067	1,677,835	2,652,808	1,195,904	228,718	245,042	157,069	394,169	601,979	421,956	9,320,912
Plaintiff Legal Costs	-	-	-	94,707	-	-	18,688	4,439,242	4,589,295	465,138	-	747,836	734,384	375,607	263,543	525,000	12,253,440
Total	8,332	324,985	397,528	432,254	122,558	212,415	360,755	6,117,077	7,242,103	1,661,042	228,718	992,878	891,453	769,776	865,522	946,956	21,574,352
Monitor/Investigator Costs	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Grand Total
Monitor Fees	-		-	-	-	-	727,668	2,701,856	2,734,256	3,608,386	2,956,417	2,495,547	2,275,448	2,576,721	2,391,057	2,400,568	24,867,924
Luhrs Building Lease & Cox							25,656	83,474	85,648	88,032	88,330	94,031	102,116	96,713	105,165	106,292	875,457
Green & Baker LTD							464	39,528	1,840								41,832
Independent Investigator	-	-	-	-	-	-	-	-	-	484,726	476,660	124,701	-	-	-	-	1,086,087
Independent Disciplinary Authority	-	-	-	-	-	-	-	-	-	98,298	155,244	280,357	68,354	-	-	-	602,253
Third Party Claims Administrator	-	-	-	-	-	-	-	-	-	-	275,400	14,707	455	-	-	-	290,562
Citizens Advisory Committee	-	-	-	-	-	-	-	-	-	-	-	15,000		-	-	-	15,000
Victim Compensation	-	-	-	-	-	-	-	-	-	-	-	14,360	56,106	11,285	144,003	30,544	256,298
Management Analyst	-	-	-	-	-	-	-	-	-	-	-	-	-	-	39,530	8,875	48,405
Total	-		-			-	753,788	2,824,858	2,821,744	4,279,442	3,952,051	3,038,703	2,502,479	2,684,719	2,679,755	2,546,279	28,083,818
MCSO Costs	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Grand Total
Operating Costs	-	-	-	-	-	-	-	10,406,054	8,608,292	16,666,847	19,641,330	20,712,572	21,543,238	23,689,378	25,525,022	29,976,542	176,769,276
Non Recurring Costs	-	-	-	-	-	-	3,000,484	2,640,594	-	1,124,726	2,858	361,686	-	516,397	-	-	7,646,745
Total	-	-	-	-	-	-	3,000,484	13,046,648	8,608,292	17,791,573	19,644,188	21,074,258	21,543,238	24,205,775	25,525,022	29,976,542	184,416,021
Grand Total	8,332	324,985	397,528	432,254	122,558	212,415	4,115,027	21,988,583	18,672,139	23,732,057	23,824,957	25,105,839	24,937,170	27,660,270	29,070,299	33,469,777	234,074,191