

MAY 25, 2022

TULSA CITY COUNCIL
EQUALITY INDICATORS INITIATIVE:

JUSTICE, TRUST & ACCOUNTABILITY

— IN POLICING TULSANS —

Council Trust & Accountability Working Group

Members: Vanessa Hall-Harper, District 1

Mykey Arthrell-Knezek, District 5 (2020-current)

(Cass Fahler, District 5 2018-2020)

Lori Decter Wright, District 7





TRUST & ACCOUNTABILITY

— IN POLICING TULSANS —

Trust & Accountability Working Group Members



▶ Vanessa Hall-Harper, District 1

Mykey Arthrell-Knezek, District 5 (2020-current)

Cass Fahler, District 5 (2018-2020)

Lori Decter Wright, District 7

▶ Council Staff:

Chris Baughman

Elizabeth Tankard



Tulsa City Council's Ranked Alternatives

for Trust & Accountability in Policing

RANKED ALTERNATIVES

TOTAL

A	Increase the number of community resource officers.	186
B	Provide a trauma-informed approach to policing in order to improve service.	185
C	Collect and share data consistent with national best practices, including data on drawing weapons, body cam footage.	181
D	Build relationships with community by attending events, walking/talking in the community, participating in service opportunities, and making presentations.	177
E	Publicize collective bargaining agreement, before it is approved.	176
F	Increase and expand crisis intervention and de-escalation programs such as CRT.	176
G	Clearly and consistently communicate policies (ex: use of force) and procedures (ex: progressive discipline process) in order to create trust.	175
H	Clearly and consistently communicate the continuous improvement efforts taking place within TPD.	174
I	Create an oversight entity to monitor internal investigations and mediate between public and police, in a format that honors all points of view and is right for Tulsa.	173
J	Increase police training on mental health issues, trauma informed care and improving everyday interactions with the public.	169
K	Listen and learn about how TPD policies and procedures are experienced across cultures and communities.	161
L	Involve community members in reducing crime and solving crime.	148
M	Improve diversity in the police force.	141
N	Study officer personal liability and immunity.	140
O	Change the uniform and tactics of police to reduce anxiety and remove the appearance of a military presence.	125
P	Educate the public on its role in de-escalation and respecting police officers.	104
Q	Implement charter change to require chief of police to be confirmed by city council.	92
R	Disband police in favor of community service strategies.	69

TRUST & ACCOUNTABILITY WORKING GROUP

OBSERVATIONS, EVALUATIONS AND RECOMMENDATIONS

1. Increase the number of community resource officers.

TPD should emphasize its work with community stakeholder organizations to engage citizens in the census tracts with the least amount of trust in law enforcement to help identify what those citizens need from the police to build relationships.

Community Resource Officers assigned by TPD should be members of the disparately impacted communities and reflect the demographics within the neighborhoods they are policing as they work to build trust.

The CRO Program must have well-developed, tangible, time bound, and measurable goals with outcomes, challenges and accomplishments reports made in writing, published, and available to the Mayor, Council, and public-at-large.

Budgetary Implication: \$95K

Budget to provide two salaried sworn officers in each of the two areas identified in the 2018 Gallup Tulsa Citivoice Index Report as having low citizen trust in the police as well as funds for necessary materials to engage the community. Explore possible grant opportunities to fund/support this program.

3. Provide a trauma-informed approach to policing in order to improve service.

- ▶ Increase Community Response Team to peak times for high priority calls every day of the week. Consider having multiple teams available during those peak times. Analyze how 988 calls will be handled and who once implement that service later in 2022.
- ▶ An annually published report regarding the Community Response Team should be provided to the Mayor, Council and public-at-large. This report should include statistical information such as the number of calls for service, how many times they were needed but unavailable, outcomes of their services, costs for the program, etc.
- ▶ Consider putting a program in place for mental health crisis calls that are urgent but not imminently dangerous. Look at Crisis Assistance Helping Out On The Streets (CAHOOTS) in Eugene, Oregon as a potential model for services to establish in Tulsa.

Budgetary Implications:

Total costs for increased CRT services to multiple shifts each day of the week: Estimated \$1.5M based on \$250K cost per team of three professionals. Launching a CAHOOTS style program: Estimated \$500K

4. Increase police training on mental health issues, trauma informed care and improving everyday interactions with the public.

▶ The City Council needs an update from TPD Training Division and more information regarding programs and training already in place. We also need to know what the identified needs are, proposed programs to meet those needs, and budgetary implications of implementing such programs.

5. Listen and learn about how TPD policies and procedures are experienced across cultures and communities.

▶ TPD should provide public updates as to how they are actively engaging disparately impacted Tulsans in an effort to build trust through transparency and accountability.

▶ TPD should establish and facilitate regular, public community meetings with division leadership and the Citizen Advisory Boards (CAB) that are public to allow citizens to provide direct feedback and input.

6. Clearly and consistently communicate policies and procedures in order to create trust.

Provide detailed information to the community about TPD's newly established Use of Force Review Board.

Provide annual Use of Force and Internal Affairs Reports to the Mayor and Council before they are provided to the media.

Provide public education regarding Tulsa Police's Use of Force Policies and regular updates to the Mayor, Council and public-at-large when those policies are amended.

Ensure ease of access to data and reports for the public-at-large. There should be a simple and direct way that anyone can access documentation of data, reports, surveillance video including stationary, dashboard and body-worn camera footage as well as navigate the City of Tulsa and TPD websites to find the latest iteration of forms, data and reports, as well as archived copies from previous years.

Hold Town Hall Meetings on a regular basis, several times throughout the year in locations across the City of Tulsa.

Regularly survey the community regarding policing in Tulsa. The 2022 CNA report has good recommendations regarding this practice.

7. Involve community members in reducing crime and solving crime.



- ▶ Continue to publicize collaborative policing efforts through various channels.
- ▶ Provide Crime Stoppers Alert Neighbors and other crime reduction training materials for training sessions offered in Spanish, Zomi, and Hmong.
- ▶ Continue to work with businesses in higher crime areas to form their own Alert Neighbors Program as well as add smart practices such as using security patrols, cameras, and alarm systems as well as filing Trespass Letters with TPD.

8. Collect and share data consistent with national best practices, including data on drawing weapons and body cam footage.

Utilize technology that detects and records when an officer's weapon is un-holstered.

Expand video storage and archive capabilities.

Employ staff that are tasked with regularly reviewing and auditing video footage recorded by or shared with TPD.

Provide a regularly published review and audit report on use of force, length of traffic stops, resisting arrest, and assault and battery of an officer outlining various statistical data captured in the database and via officer reports to the Mayor, Council, and public-at-large.

Proactively release TPD video recordings to the public within 24 hours of the critical or controversial incident occurring as well as upon request by the Mayor and/or City Councilor(s).

This Working Group agrees with CNA's recommendation on page 45 of their 2022 report that TPD "should consider undertaking an additional study—a racial bias audit. A number of police departments across the nation are funding racial bias audits to examine policies and administrative data on arrests, traffic stops, field interviews/contacts, complaints, and use of force to identify evidence of racial bias in the actions of their officers. The studies then make recommendations for addressing the findings."

Budgetary Implication: \$250K

Enter into a RFP process to contract an expert researcher to conduct a racial bias audit.

9. Improve diversity in the police force.

The Council should consider using ARPA or other available funds to leverage matching dollars with Tulsa County and/or the State of Oklahoma to pilot expansion of the Guardian Development Project in Tulsa area high schools beginning in the Fall of 2023.

It may be that an independent 501(c)3 needs to be formed with an Executive Director and Program Staff to successfully lead the Guardian Development Project efforts since they do not sit entirely within the Tulsa Police Department but also involve Tulsa Community College and Oklahoma State University-Tulsa. This would also free up the organization's ability to fundraise private donations in support of the work including scholarships for the students as well as stipends for officer mentors. JROTC has been very successful in preparing high schoolers to enter the military and it seems that this similar model proposed with expanding the Guardian Development Project into high schools could yield similar results.

10. Change the uniform and tactics of police to reduce anxiety and remove the appearance of a military presence.

Look into various uniform options for police officers and select those that lower public anxiety without compromising officer safety.

During collective bargaining, ensure negotiations allow TPD uniforms to be changed to whichever are determined to accomplish lowering public anxiety without compromising officer safety.

11. Create an oversight entity to monitor internal investigations and mediate between public and police in a format that honors all points of view and is right for Tulsa.

Whether it be an Office of the Independent Monitor (OIM) or an alternative format, the City of Tulsa needs to establish an independent accountability entity that regularly monitors and reviews TPD in order to increase transparency and accountability in policing. In order to be effective, this entity must be independent of TPD and tasked with providing police oversight through means of review, audit, and advisement as it pertains to critical and/or controversial incidents that take place between TPD and citizens within the City of Tulsa.

Establishing an OIM or similar independent accountability entity can be accomplished by Executive action of the Mayor, a joint effort of the Mayor and Council to pass an ordinance, Council-initiated Charter Amendment, or Citizen petition initiative Charter Amendment. The Mayor and City Council with input from the Tulsa Police Department and citizens of Tulsa must determine which pathway to utilize. Research by this Working Group indicates that cities across the country have implemented their independent oversight entities in a variety of ways and this Working Group recommends that City of Tulsa choose the ordinance approach.

11 cont.

▶ This Working Group challenges the Mayor and City Council to complete this policy work in 2022 so that an independent oversight entity can be established in 2023. This effort is especially critical now that a Real Time Information Center (RTIC) has been proposed by both the Mayor and Police Department.

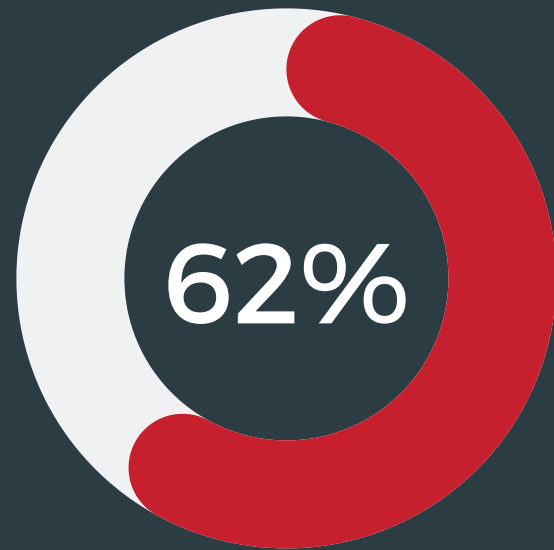
▶ This Working Group recommends that the August 2019 proposed ordinance to establish an Officer of the Independent Monitor (OIM) and Citizen Oversight Board (COB) be used as a foundation for re-engaging in this policy work. Furthermore, given the U.S. Supreme Court's McGirt decision of 2020, this Working Group proposes that a person with deep legal expertise in Tribal law be part of the requirements for either the Monitor (or equivalent) and/or the Deputy Monitor (or equivalent) to help advise policies that work within the guidelines established by the McGirt decision as it pertains to public safety policy and law enforcement within the City of Tulsa.

Budgetary Implication: \$750K

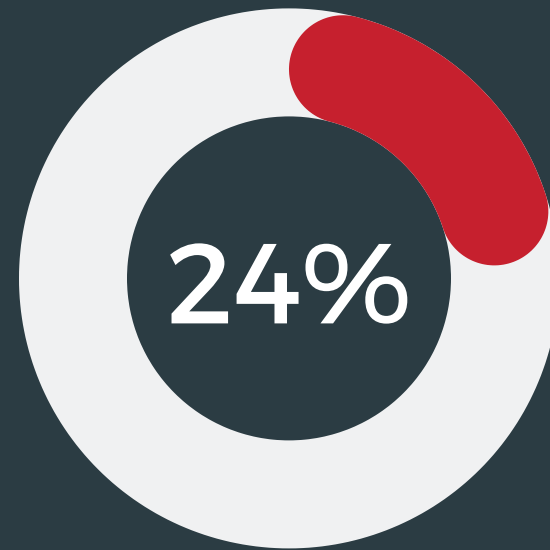
Estimated \$500K based on initial OIM Budget Proposal from 2019. It is likely this number should be closer to \$750K to ensure full staffing and functionality of a new independent oversight entity.

Peer City Statistics

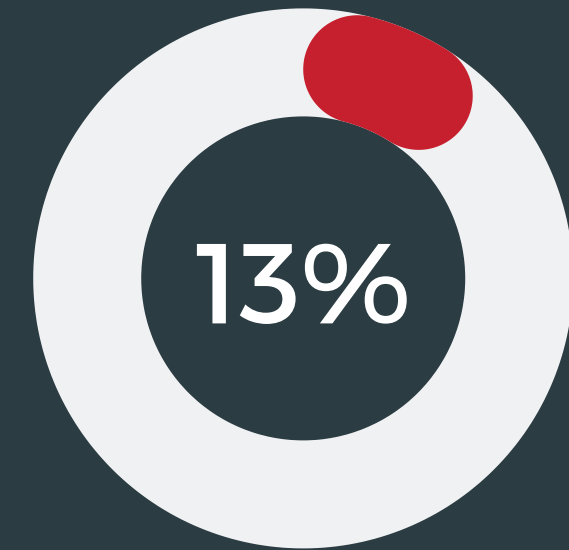
of 29 examined cities



have Independent Oversight and Real Time Crime Center




have Independent Oversight and **no** Real Time Crime Center



do not have Independent Oversight or Real Time Crime Center

Example Cities



CITY	POPULATION	PD PERSONNEL	PD BUDGET (MILLIONS)	INDEPENDENT OVERSIGHT	RTCC
Las Vegas, NV	641,676	3,596	\$661.8	YES	YES
New Orleans, LA	393,292	1,552	\$193.8	YES	YES
Fort Worth, TX	874,168	2,241	\$443.1	YES	YES
Birmingham, AL	200,673	1,097	\$100.5	YES	YES

SPECIAL THANKS

The Trust & Accountability Working Group members would like to thank all those whose time, talent, effort and care went into helping us research and prepare this report and the recommendations contained therein:

Mayor G.T Bynum

2019-2020 City Council:

Vanessa Hall-Harper, District 1
Jeannie Cue, District 2
Crista Patrick, District 3
Kara Joy McKee, District 4
Cass Fahler, District 5
Connie Dodson, District 6
Lori Decter Wright, District 7
Phil Lakin, District 8
Ben Kimbro, District 9

2020-2022 City Council:

Vanessa Hall-Harper, District 1
Jeannie Cue, District 2
Crista Patrick, District 3
Kara Joy McKee, District 4
Mykey Arthrell-Knezek, District 5
Connie Dodson, District 6
Lori Decter Wright, District 7
Phil Lakin, District 8
Jayme Fowler, District 9

Tulsa City Council Staff

Tulsa Mayor's Office of Resilience and Equity Staff

Tulsa Community Service Council

Chief Wendell Franklin, Director Matt Kirkland, Captain Shellie Siebert
and the Tulsa Police Department

Michael Carter, City of Sand Springs Manager

Darita Huckabee

Expert Panelists who participated in the
2019 Equality Indicators: Justice Special Meetings
Tulsa Performing Arts Center

M A Y 2 5 , 2 0 2 2

TULSA CITY COUNCIL
EQUALITY INDICATORS INITIATIVE:

JUSTICE, TRUST & ACCOUNTABILITY

— I N P O L I C I N G T U L S A N S —

**Trust and Accountability Working Group
Comprehensive Report**



Tulsa City Council

Equality Indicators Initiative: Justice *Trust & Accountability in Policing Tulsans* Report & Recommendations

May 25, 2022

Council Trust & Accountability Working Group Members:
Vanessa Hall-Harper, District 1
Mykey Arthrell-Knezek, District 5 (2021-current)
(Cass Fahler, District 5 2020-2021)
Lori Decter Wright, District 7

Council Staff:
Chris Baughman
Elizabeth Tankard

HISTORY OF THE PROJECT:¹

In 2018, the City of Tulsa collaborated with the Community Service Council to produce the first Equality Indicators report. This annual report uses data to measure racial equality as it relates to six themes: economic opportunity, education, housing, justice, public health, and services in Tulsa. Each theme is broken down into topics.

The 2018 report was released to establish a statistical baseline for understanding inequity in Tulsa. The City is working to find collective solutions to items highlighted in the report. As a part of this collective process, the Tulsa City Council (Council) voted in March 2019 to hold Special Meetings related to the topics under the fourth theme: Justice.

Goals First Adopted by the Tulsa City Council:

1. Building trust between the residents of Tulsa and Law Enforcement.
2. Improving transparency in City government especially as it pertains to justice.
3. Providing an opportunity for community stakeholders to share their expertise and insight as to why the numbers exist as reported and make recommendations to improve outcomes.
4. Ensuring that everyone knows the same statistical data and information, how it is reported and collected.
5. Potentially leading to policy changes that will improve outcomes for Tulsans.

In 2019, The Tulsa City Council held a series of community listening session, meetings with public comments, and four Special Meetings at the Tulsa Performing Arts Center to review and receive input regarding the Tulsa Equality Indicators as they pertain to Justice in four categories:

1. Meeting #1: June 26, 2019: Understanding and addressing racial and gender disparities in police arrests of youth and current practices in place to improve outcomes.
2. Meeting #2: July 17, 2019: Race & Officer Use of Force Understanding and addressing racial disparities in police use of force and current practices in place to improve outcomes.
3. Meeting #3: August 14, 2019: Understanding and addressing minority and gender underrepresentation in the police department and current practices that are in place to improve recruitment and retention of minority officers in the department.
4. Meeting #4: September 25, 2019: Understanding and addressing racial and gender disparities in police arrests of adults and current practices in place to improve outcomes.

¹ [HTTPS://TULSACOUNCIL.ORG/RESOURCES/COUNCIL-EQUALITY-INDICATORS-INITIATIVE/](https://tulsacouncil.org/resources/council-equality-indicators-initiative/)

In 2020, the Tulsa City Council worked with City staff to develop Ranked Alternatives to address the following problem statement:

Building trust between citizens and the Tulsa Police Department through must be accomplished through increased transparency and accountability measures and efforts.

RANKED ALTERNATIVES:		Total
<i>A</i>	Increase the number of community resource officers.	186
<i>B</i>	Provide a trauma-informed approach to policing in order to improve service.	185
<i>C</i>	Collect and share data consistent with national best practices, including data on drawing weapons, body cam footage.	181
<i>D</i>	Build relationships with communities by attending events, walking and talking in the community, participating in service opportunities, and making presentations.	177
<i>E</i>	Publicize collective bargaining agreement, before it is approved.	176
<i>F</i>	Increase and expand crisis intervention and de-escalation programs such as CRT.	176
<i>G</i>	Clearly and consistently communicate policies (such as use of force) and procedures (such as progressive discipline process) in order to create trust.	175
<i>H</i>	Clearly and consistently, communicate the continuous improvement efforts taking place within TPD.	174
<i>I</i>	Create an oversight entity to monitor internal investigations and mediate between public and police, in a format that honors all points of view and is right for Tulsa.	173
<i>J</i>	Increase police training on mental health issues, trauma informed care and improving everyday interactions with the public.	169
<i>K</i>	Listen and learn about how TPD policies and procedures are experienced across cultures and communities.	161
<i>L</i>	Involve community members in reducing crime and solving crime.	148
<i>M</i>	Improve diversity in the police force.	141
<i>N</i>	Study officer personal liability and immunity.	140
<i>O</i>	Change the uniform and tactics of police to reduce anxiety and remove the appearance of a military presence.	125
<i>P</i>	Educate the public on its role in de-escalation and respecting police officers.	104
<i>Q</i>	Implement charter change to require chief of police to be confirmed by city council.	92
<i>R</i>	Disband police in favor of community service strategies.	69

In 2020 and 2021, the Tulsa City Council created three working groups: Data Collection and Reporting, Court Fines and Fees, and Trust and Accountability. This report is presented by the Trust and Accountability Working Group and includes its research and recommendations as to the Tulsa City Council on Wednesday, May 25, 2022.

METHOD:

The Trust & Accountability Working Group members and Council staff met with community stakeholders throughout 2021 to develop its recommendations. These meetings included a visit with Tulsa Police Chief Wendell Franklin and Director Matt Kirkland and their staff, as well as Sand Springs City Manager, and former Police Chief, Michael Carter.

The Working Group met regularly to review the Ranked Alternatives and developed a color-coded system to track feasibility and/or the implementation of each alternative:

- Red: not currently in progress**
- Yellow: in progress or possible**
- Green: possible and accomplished**

As of the completion of this report, the current level of implementation of the Ranked Alternatives is as follows:

RANKED ALTERNATIVES:		Total
A	Increase the number of community resource officers.	186
B	Provide a trauma-informed approach to policing in order to improve service.	185
C	Collect and share data consistent with national best practices, including data on drawing weapons, body cam footage.	181
D	Build relationships with communities by attending events, walking and talking in the community, participating in service opportunities, and making presentations.	177
E	Publicize collective bargaining agreement, before it is approved.	176
F	Increase and expand crisis intervention and de-escalation programs such as CRT.	176
G	Clearly and consistently communicate policies (such as use of force) and procedures (such as progressive discipline process) in order to create trust.	175
H	Clearly and consistently communicate the continuous improvement efforts taking place within TPD.	174
I	Create an oversight entity to monitor internal investigations and mediate between public and police, in a format that honors all points of view and is right for Tulsa.	173
J	Increase police training on mental health issues, trauma informed care and improving everyday interactions with the public.	169
K	Listen and learn about how TPD policies and procedures are experienced across cultures and communities.	161
L	Involve community members in reducing crime and solving crime.	148
M	Improve diversity in the police force.	141
N	Study officer personal liability and immunity.	140
O	Change the uniform and tactics of police to reduce anxiety and remove the appearance of a military presence.	125
P	Educate the public on its role in de-escalation and respecting police officers.	104
Q	Implement charter change to require chief of police to be confirmed by city council.	92
R	Disband police in favor of community service strategies.	69

TRUST & ACCOUNTABILITY WORKING GROUP OBSERVATIONS, EVALUATIONS AND RECOMMENDATIONS

A. Increase the number of community resource officers. (Ranked Score: 186)

After Wendell Franklin was named Chief of Police of the TPD in February 2020, he established the Community Engagement Unit (CEU). This unit has 18 officers who engage with communities across the city that are especially active in community service and public relations events. It is unclear whether the proposed Community Resource Office (CRO) Program, first discussed in late 2019 and early 2020, has yet to be fully implemented. Due to the effects of the Covid-19 pandemic on staffing priorities within TPD, it has yet to embed officers in census tracks identified to have low trust in law enforcement.

RECOMMENDATIONS:

1. TPD should emphasize its work with community stakeholder organizations to engage citizens in the census tracks with the least amount of trust in law enforcement to help identify what those citizens need from the police to build relationships.²
2. The Working Group emphasizes that while crime reduction may also be a goal of building trust within disparately impacted communities, it is essential that any relationship building efforts are authentic and not transactional; community members who do not trust law enforcement often have lived experiences - personal, communal, cultural and generational - that inform their skepticism and distrust. This reality must be honored, and the process of building trust must be a collaboration between community members, stakeholders, and law enforcement, with disparately impacted community members at the center of the process.
3. Community Resource Officers assigned by TPD should be members of the disparately impacted communities and reflect the demographics within the neighborhoods they are policing as they work to build trust.

² [HTTPS://WWW.CITYOFTULSA.ORG/MEDIA/9389/GALLUP_TULSA_CITIVOICE_2018_FINAL-REPORT2.Pdf](https://www.cityoftulsa.org/media/9389/gallup_tulsa_citivoice_2018_final-report2.pdf)

4. The CRO Program must have well-developed, tangible, time bound, and measurable goals with outcomes, challenges and accomplishments reports made in writing, published, and available to the Mayor, Council, and public-at-large.

BUDGETARY IMPLICATION: \$95K

Budget to provide two salaried sworn officers in each of the two areas identified in the 2018 Gallup Tulsa CitiVoice Index Report as having low citizen trust in the police as well as funds for necessary materials to engage the community. Explore possible grant opportunities to fund/support this program.

B. Provide a trauma-informed approach to policing in order to improve service. (Ranked Score 185)

The City of Tulsa and community organizations, such as Family & Children's Services, Health Minds Institute, Mental Health Association of Oklahoma, and Oklahoma State University, have collaborated in recent years on several key initiatives to address the mental health crisis facing our community. Several programs offer to assist citizens in crisis:

1. Embedded social workers from Family & Children's Services' Community Outreach Psychiatric Emergency Services (COPES) are staffing the 911 Call Center.
2. Major investments are slated to create a 160-bed in-patient psychiatric Emergency Room (ER) at OSU-Tulsa.
3. Beds have been added to the Tulsa Sobering Center to include individuals struggling with methamphetamine addiction in addition to those already serving alcohol related public intoxication.
4. City of Tulsa's Community Response Team (CRT), comprised of a police officer, firefighter, and social worker, has been expanded to operate five days a week (up from two days/week in 2019 and three days/week in 2020).
5. The Street Outreach Team at Housing Solutions Tulsa has expanded their outreach teams from three staff to eight in order to provide more outreach services across the City to reach Tulsans experiencing unsheltered homelessness.³
6. TPD's Downtown Impact Unit provides law enforcement services alongside Downtown Tulsa Partnership's Downtown Ambassadors, who render non-police assistance to residents and visitors within the Inner Dispersal Loop (IDL).
7. Tulsa Municipal Court's Special Services Docket⁴ offers proven programs and therapeutic alternatives to fines, fees and incarceration.
8. The Tulsa Sobering Center⁵ offers citizens an alternative to being incarcerated for public intoxication of alcohol or methamphetamines.

³ [HTTPS://WWW.HOUSINGSOLUTIONSTULSA.ORG/ASSISTANCE-REQUEST/](https://www.housingsolutionstulsa.org/assistance-request/)

⁴ [HTTPS://MHAOK.ORG/SPECIAL-SERVICES-DOCKET](https://mhaok.org/special-services-docket)

⁵ [HTTPS://WWW.TULSAPOLICE.ORG/TULSA-MUNICIPAL-JAIL/TULSA-SOBERING-CENTER.ASPX](https://www.tulsapolice.org/tulsa-municipal-jail/tulsa-sobering-center.aspx)

RECOMMENDATIONS:

1. Help the community understand that the City of Tulsa's Community Response Team (CRT) is a suicide prevention team⁶. 911 calls for service dispatchers deploy the CRT where they de-escalate situations where individuals are threatening harm to themselves or others. The CRT does not respond other types of mental health crisis calls.
2. Increase CRT to peak times for high priority calls every day of the week. Consider having multiple teams available during those peak times.⁷ Analyze how 988 calls will be handled, and by whom, once that service is implemented later in 2022.
3. An annually published report regarding the Community Response Team (CRT) should be provided to the Mayor, Council and public-at-large. This report should include statistical information such as the number of calls for service, how many times they were needed but unavailable, outcomes of their services, costs for providing CRT, etc.
4. Consider putting a program in place for mental health crisis calls that are urgent but not imminently dangerous. Look at Crisis Assistance Helping Out On The Streets (CAHOOTS) in Eugene, Oregon as a potential model for services to establish in Tulsa.⁸
5. Provide citizens with basic mental health first aid training through OSU-Tulsa to help assist with de-escalating situations in the community where individuals are experiencing an urgent mental health situation that is not requiring police or CRT intervention.⁹

BUDGETARY IMPLICATIONS:

Total costs for increased CRT services to multiple shifts each day of the week: Estimated \$1.5M based on \$250K cost per team of three professionals
Launching a CAHOOTS style program: Estimated \$500K

C. Collect and share data consistent with national best practices, including data on drawing weapons, body cam footage. (Ranked Score 181)

New body cameras for Tulsa Police Officers have been funded with American Rescue Plan Act (ARPA) funds. The Council's Data Collection Working Group is focused on addressing this ranked alternative and will have outlined their recommendations in their report provided to the City Council on May 18, 2022.

RECOMMENDATIONS:

1. Utilize technology that detects and records when an officer's weapon is unholstered.

⁶ [HTTPS://MHAOK.ORG/COMMUNITY-RESPONSE-TEAM](https://mhaok.org/community-response-team)

⁷ News on 6 "Tulsa CRT Struggles To Keep Up With Mental Health Calls" April 1, 2022 Report: <https://www.youtube.com/watch?v=sKnwjJYdBF8>

⁸ [HTTPS://WWW.EUGENE-OR.GOV/4508/CAHOOTS](https://www.eugene-or.gov/4508/CAHOOTS)

⁹ [HTTPS://GO.OKSTATE.EDU/CAMPAIGNS/LETS-TALK-ABOUT-IT/BECOME-AN-ADVOCATE.HTML](https://go.okstate.edu/campaigns/lets-talk-about-it/become-an-advocate.html)

2. Expand video storage and archive capabilities.
3. Employ staff that are tasked with regularly reviewing and auditing video footage recorded by or shared with TPD.
4. Provide a regularly published review and audit report on use of force, length of traffic stops, resisting arrest, and assault and battery of an officer outlining various statistical data captured in the database and via officer reports to the Mayor, Council, and public-at-large.
5. Proactively release TPD video recordings to the public within 24 hours of the critical or controversial incident occurring as well as upon request by the Mayor and/or City Councilor(s).
6. This Working Group agrees with CNA's recommendation on page 45 of their 2022 report that TPD "should consider undertaking an additional study—a racial bias audit. A number of police departments across the nation are funding racial bias audits to examine policies and administrative data on arrests, traffic stops, field interviews/contacts, complaints, and use of force to identify evidence of racial bias in the actions of their officers. The studies then make recommendations for addressing the findings."¹⁰

D. Build relationships with communities by attending events, walking and talking in the community, participating in service opportunities, and making presentations. (Ranked Score 177)

The Community Engagement Unit (CEU) has taken primary responsibility for Tulsa Police participating in community events and public service opportunities. Chief Franklin has emphasized that collaborative policing is the responsibility of every officer no matter which unit they are assigned.

RECOMMENDATIONS:

1. An annual report of the CEU's activities, strategies, goals and outcomes should include measuring outcomes and effectiveness for improving community relations, increasing accountability and building trust.
2. Provide each Tulsa Police Officer and Staff Member with business cards they can present to citizens.¹¹



¹⁰ [HTTPS://IMG1.WSIMG.COM/BLOBBY/GO/275655A4-71C7-48FF-97FF-725D886C48AC/TULSA%20COMMUNITY%20POLICING%20EVALUATION%20REPORT%20-%20F.PDF](https://img1.wsimg.com/blobby/go/275655a4-71c7-48ff-97ff-725d886c48ac/tulsa%20community%20policing%20evaluation%20report%20-%20f.pdf) Page 45

¹¹ [HTTPS://WWW.PUBLICRADIOTULSA.ORG/LOCAL-REGIONAL/2021-06-10/COUNCIL-WORKING-GROUP-RECOMMENDS-BUSINESS-CARDS-AS-SMALL-STEP-IN-BUILDING-TRUST-IN-TPD](https://www.publicradiotulsa.org/local-regional/2021-06-10/council-working-group-recommends-business-cards-as-small-step-in-building-trust-in-tpd)

E. Publicize collective bargaining agreement, before it is approved. (Ranked Number 176)

City Legal has verbally advised City Councilors in 2021 that neither the Mayor nor the Council are permitted to participate in the collective bargaining process between the City of Tulsa and the Tulsa Fraternal Order of Police #93 (FOP). The Mayor only signs onto approving the contract after all negotiations have been agreed upon by the City of Tulsa and the FOP. Furthermore, City Legal has stated the bargaining agreement cannot be a public process until completed.

RECOMMENDATIONS:

1. Increase public knowledge of the collective bargaining process. Citizens have expressed the desire to better understand the process as well as how the State of Oklahoma's Police and Fire Arbitration Act influences what can and cannot be negotiated into the contract.
2. Educate the public about the FOP and its role in the bargaining process and the services it provides to its members.
3. Delineate the similarities and differences between the FOP and the FOP P Political Action Committee. The public needs to develop a better understanding of the FOP's Political Action Committee and its influence¹² on decision makers.
4. Present the Mayor's approved annual Collective Bargaining Agreement with the FOP to the Council in Committee before releasing to the public and media.

F. Increase and expand crisis intervention and de-escalation programs such as CRT. (Ranked Score 176)

See item B, "Provide a trauma-informed approach to policing in order to improve service," on page 6 of this report.

G. Clearly and consistently communicate policies (such as use of force) and procedures (such as progressive discipline process) in order to create trust. (Ranked Score 175)

TPD has established an internal Use of Force Review Board¹³ and Chief Franklin shared with the Working Group that there has been a "tightening up" of policies especially as related to Use of

¹² [HTTPS://TULSAWORLD.COM/NEWS/LOCAL/GOVERNMENT-AND-POLITICS/POLICE-UNION-LEADER-EXPLAINS-HOW-ORGANIZATION-FLIPPED-THE-VOTE-ON-CITY-COUNCILS-OVERSIGHT-PROPOSAL/ARTICLE_55B65DD9-2856-5008-9180-6B1783D73053.HTML](https://tulsa-world.com/news/local/government-and-politics/police-union-leader-explains-how-organization-flipped-the-vote-on-city-councils-oversight-proposal/article_55b65dd9-2856-5008-9180-6b1783d73053.html)

¹³ [HTTPS://TULSAWORLD.COM/NEWS/LOCAL/TULSA-POLICE-TO-STAND-UP-INTERNAL-USE-OF-FORCE-REVIEW-BOARD/ARTICLE_494009E4-0CE8-11EC-A63F-C3EFB0406412.HTML](https://tulsa-world.com/news/local/tulsa-police-to-stand-up-internal-use-of-force-review-board/article_494009e4-0ce8-11ec-a63f-c3efb0406412.html)

Force and Internal Affairs. Director of Planning, Policy and Quality Control Matt Kirkland has been tasked with analyzing Use of Force reports, video, etc. to provide the 2019 Annual Report¹⁴ and 2019 Internal Affairs Report,¹⁵ both released by TPD on November 30, 2020.¹⁶

As of March 1, 2022, TPD has uploaded an updated Policy Manual to their website.¹⁷ Neither an Annual Report nor Internal Affairs Report for 2020 or 2021 can be located on either the City of Tulsa or TPD websites. It may be that the Covid-19 Pandemic coupled with the 2021 cyberattack on the City's IT infrastructure have resulted in delays in producing the reports for 2020 and 2021. It is imperative that the data from 2020 and 2021 be analyzed and reported in published reports available to the Mayor, Council and public-at-large.

In addition, the Tulsa World reported on September 5, 2021, that TPD has established an internal Use of Force Review Board.¹⁸ Little public information is available regarding the responsibilities of the Use of Force Review Board, who the members are, how they were selected, how often they meet, how cases to be reviewed are determined, the process for reviewing cases and whether or not public reports including documentation and data pertaining to such cases.

Communication with the public must be direct, transparent and consistent. It remains to be seen if any of the reports provided by TPD provide sufficient information to the public to effectively increase accountability to, or trust with, community members where it is currently lacking. To increase transparency, updates on policies, procedures, data analysis and reports should be regularly provided to the public through press conferences, updates to the Council during committee meetings, and public town halls. TPD would do well to ensure that their communications is consistent across their social media channels so citizens are not hunting down information provided on YouTube that hasn't be shared on Twitter, Facebook, or TikTok, for example. Traditional media sources such as television and printed news outlets must also be included so that the information is provided to citizens in the format they are comfortable receiving it.

Town Halls held in disparately impacted communities, organized and led by trusted community leaders and partners, is the most ideal way for TPD and COT to develop relationships with community stakeholders, families and individuals in disparately impacted communities. This Working Group agrees with CNA's assertion that:

“A key recommendation of the Task Force on 21st Century Policing is for police agencies to establish a culture of transparency to build public trust and legitimacy. Holding town halls on a regular basis would be a good path forward, but TPD should plan and initiate the town halls,

¹⁴ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167252/TPD_2019_ANNUAL_REPORT.PDF](https://www.tulsapolice.org/media/167252/TPD_2019_ANNUAL_REPORT.PDF)

¹⁵ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167247/IA_ANNUAL_REPORT_2019.PDF](https://www.tulsapolice.org/media/167247/IA_ANNUAL_REPORT_2019.PDF)

¹⁶ [HTTPS://WWW.TULSAPOLICE.ORG/NEWS/NEWS-STORIES/2020/TPD-2019-ANNUAL-REPORT-AND-IA-ANNUAL-REPORT-.ASPX](https://www.tulsapolice.org/news/news-stories/2020/TPD-2019-ANNUAL-REPORT-AND-IA-ANNUAL-REPORT-.ASPX)

¹⁷ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167792/POLICY%20MANUAL%2003012022_REDACTED.PDF](https://www.tulsapolice.org/media/167792/POLICY%20MANUAL%2003012022_REDACTED.PDF). *It is helpful that the newest policies are highlighted with a gray outline to draw the reader's attention to them.*

¹⁸ [HTTPS://TULSAWORLD.COM/NEWS/LOCAL/TULSA-POLICE-TO-STAND-UP-INTERNAL-USE-OF-FORCE-REVIEW-BOARD/ARTICLE_494009E4-0CE8-11EC-A63F-C3EFB0406412.HTML](https://tulsa-world.com/news/local/tulsa-police-to-stand-up-internal-use-of-force-review-board/article_494009e4-0ce8-11ec-a63f-c3efb0406412.html)

ensure key members of the command staff are present, and partner with various 46 community organizations, particularly those that have built trust with marginalized groups and can turn out residents. Partner organizations could include churches, service organizations, or grassroots groups.”¹⁹

This Working Group also agrees that surveys of community stakeholders and individuals should be regularly conducted to learn how the reported information helps residents better understand Tulsa Police practices, policies and programs. These surveys and public meetings as well as public messaging should be provided in multiple languages including English and Spanish as well as Hmong, Zomi, and Vietnamese as much as is possible. Deaf Interpreters should be made available at in-person meetings as needed. This ensures all citizens have access to the information disseminated by COT and TPD.

RECOMMENDATIONS:

1. Provide detailed information to the community about TPD’s newly established Use of Force Review Board.
2. Provide annual Use of Force and Internal Affairs Reports to the Mayor and Council before they are provided to the media.
3. Provide public education regarding Tulsa Police’s Use of Force Policies and regular updates to the Mayor, Council and public-at-large when those policies are amended.
4. Ensure ease of access to data and reports for the public-at-large. There should be a simple and direct way that anyone can access documentation of data, reports, surveillance video including stationary, dashboard and body-worn camera footage as well as navigate the City of Tulsa and TPD websites to find the latest iteration of forms, data and reports, as well as archived copies from previous years.
5. Hold Town Hall Meetings on a regular basis, several times throughout the year in locations across the City of Tulsa.
6. Regularly survey the community regarding policing in Tulsa. The 2022 CNA report has good recommendations regarding this practice.

H. Clearly and consistently communicate the continuous improvement efforts taking place within TPD. (Ranked Score 174)

TPD does a good job of leveraging earned and unearned media to share their work with the public. They also use their social media channels to amplify their work and outreach efforts. There could be more consistent and clear communication as pertains to ongoing improvement efforts taking place within TPD.

¹⁹ [HTTPS://IMG1.WSIMG.COM/BLOBBY/GO/275655A4-71C7-48FF-97FF-725D886C48AC/TULSA%20COMMUNITY%20POLICING%20EVALUATION%20REPORT%20-%20F.PDF](https://img1.wsimg.com/blobby/go/275655A4-71C7-48FF-97FF-725D886C48AC/TULSA%20COMMUNITY%20POLICING%20EVALUATION%20REPORT%20-%20F.PDF) Page 45

RECOMMENDATIONS:

1. Produce and publish timely reports on a consistent, annual basis that are presented to the public not just through the media or social media but also through in-person and virtual events such as Town Hall and community meetings, especially in disparately impacted communities as indicated in the Equality Indicators Report²⁰ and Gallup Tulsa Citivoice Index²¹. Include an opportunity for questions and answers from the public during these Town Hall sessions and community meetings.
2. When improvements are made, clearly state to the public the reasons and goals for making the improvements, identify what measurable outcomes are expected, and report on outcomes providing clear data to support analysis.
3. Approach communication efforts to the public as an authentic community engagement process intended to develop more transparency, accountability and trust rather than a public relations and marketing opportunity. Whenever possible select an approach that shows rather than tells. Be impeccable with your words and find ways to use written, spoken, graphic designs, photographic and video messaging that unifies the public rather than divides it. Ensure that communications and messaging from the Tulsa Police Department is in coordination and alignment with the City of Tulsa's communications and messaging. Streamline TPD' online presence, currently TPD has three separate websites: tulsapolice.org, tulsapolicenews.org and joinTPD.com which serve different functions, but it may not be entirely clear to the public that each are run by TPD.

Tulsapolicenews.org archives the entire CNA evaluation process but it is difficult to navigate. For example, CNA's final report to download by PDF is deeply nested within the website requiring someone looking for the report to first visit tulsapolicenews.org; then click "collaborative policing" in the header menu to locate "2021 evaluation" in the drop down menu; navigate to that page, then scroll down to the bottom of that page to find in the "for more information" menu at the bottom; then, select the "find out more" button under the "latest progress" title; click that to then be on the "project timeline" page, navigate to the May 2022 section and click the "CNA Report" button, which opens up the CNA Complete Report page that has the report nested in a table there or has a link to download a PDF of the report. Creating direct access to the report on the homepage of this website would go a long way to increasing transparency and accountability.

I. Create an oversight entity to monitor internal investigations and mediate between public and police, in a format that honors all points of view and is right for Tulsa. (Ranked Score 173)

In January 2019, Mayor Bynum announced his desire to establish an Office of the Independent Monitor (OIM) to provide independent oversight of policing in Tulsa.²² A team from the Mayor's

²⁰ [HTTPS://CSCTULSA.ORG/TULSAEI/](https://csctulsa.org/tulsaEI/)

²¹ [HTTPS://WWW.CITYOFTULSA.ORG/MEDIA/9389/GALLUP_TULSA_CITIVOICE_2018_FINAL-REPORT2.PDF](https://www.cityoftulsa.org/media/9389/gallup_tulsa_citivoice_2018_final-report2.pdf)

²² [HTTPS://WWW.CITYOFTULSA.ORG/PRESS-ROOM/MAYOR-ANNOUNCES-PLANS-FOR-OFFICE-OF-THE-INDEPENDENT-MONITOR/](https://www.cityoftulsa.org/press-room/mayor-announces-plans-for-office-of-the-independent-monitor/)

office had traveled to Denver, CO in late 2018 to learn more about their OIM, outcomes, policies and procedures.

In March 2019 through August 2019²³, the Mayor, City Legal, and a group of City Councilors worked together to draft an ordinance²⁴ to establish an OIM and Citizen Oversight Board (COB).²⁵ Despite providing \$250K in the Municipal Budget for Fiscal Year 2020 to establish the OIM and CROB, an impasse developed within the City Council which precluded passage of the proposed ordinance.

With the goal of accomplishing some of what the OIM and COB would have been tasked with, Mayor Bynum withdrew the proposed ordinance from the Council's agenda on September 25, 2019, and pivoted to the following five-point approach²⁶:

1. Contract with an outside entity that specializes in participatory research to evaluate Tulsa's community policing program and coordinate with local stakeholders in the development of the City of Tulsa's next phase of community policing activity.
2. A comprehensive TPD Annual Report will be submitted to the Mayor and City Council. The Report will capture and make public the information that would have been reported by the OIM, including clear and consistent use-of-force data and demographics, as well as trends, case studies, policy changes and notable officer successes. The goal of the annual report is to empower the Mayor and Council more effectively in their oversight of TPD and for the department to be more transparent and accessible to citizens.
4. Formalize the organization, responsibilities, appointment process and meeting schedule for the TPD Citizen Advisory Board and Citizen Action Groups.
5. Follow through on recommendations related to use of force from the comprehensive study, *A Multi-Method Investigation of Officer Decision-Making and Force Used or Avoided in Arrest Situations*.²⁷
6. Following success with the community resource officer stationed in the 61st and Peoria area, the Mayor has proposed hiring Community Resource Officers for the Gilcrease and Mingo Valley Divisions (the 61st and Peoria area falls within the Riverside Division). Continue the commitment to data-driven decision-making by focusing these officers' work in areas where citizen trust of police is the lowest based on Gallup CitiVoice Index data.

²³ [HTTPS://TULSAWORLD.COM/NEWS/HERES-WHAT-YOU-NEED-TO-KNOW-ABOUT-THE-PROPOSED-OFFICE-OF-THE-INDEPENDENT-MONITOR/ARTICLE_6178184D-45EF-5B06-9D9B-E7BF6E7BBAB3.HTML](https://tulsa-world.com/news/heres-what-you-need-to-know-about-the-proposed-office-of-the-independent-monitor/article_6178184d-45ef-5b06-9d9b-e7bf6e7bbab3.html)

²⁴ [HTTPS://TULSAWORLD.COM/OFFICE-OF-THE-INDEPENDENT-MONITOR-ORDINANCE/PDF_C94FF750-6679-58B6-B776-BAE2BFC90689.HTML](https://tulsa-world.com/office-of-the-independent-monitor-ordinance/pdf_c94ff750-6679-58b6-b776-bae2bfc90689.html); [HTTPS://TULSAWORLD.COM/NEWS/MAYOR-UNVEILS-ORDINANCE-TO-CREATE-INDEPENDENT-OFFICE-TO-REVIEW-POLICE-USE-OF-FORCE-INCIDENTS/ARTICLE_A3060F91-9F6F-5400-9C5A-C8D1CA5B3B86.HTML](https://tulsa-world.com/news/mayor-unveils-ordinance-to-create-independent-office-to-review-police-use-of-force-incidents/article_a3060f91-9f6f-5400-9c5a-c8d1ca5b3b86.html)

²⁵ [HTTPS://TULSAWORLD.COM/NEWS/HERES-WHAT-YOU-NEED-TO-KNOW-ABOUT-THE-PROPOSED-OFFICE-OF-THE-INDEPENDENT-MONITOR/ARTICLE_6178184D-45EF-5B06-9D9B-E7BF6E7BBAB3.HTML](https://tulsa-world.com/news/heres-what-you-need-to-know-about-the-proposed-office-of-the-independent-monitor/article_6178184d-45ef-5b06-9d9b-e7bf6e7bbab3.html)

²⁶ [HTTPS://TULSACOUNCIL.ORG/COUNCIL-PRESS-ROOM/MAYORS-PRESENTATION-TO-THE-COUNCIL-SEPT-25/](https://tulsa-council.org/council-press-room/mayors-presentation-to-the-council-sept-25/); Watch the Mayor Bynum's full presentation to the City Council online. The presentation begins at the 48:15 mark here: [HTTPS://CITYOFTULSA.VIEBIT.COM/PLAYER.PHP?HASH=73BUC8L4VXJR](https://cityoftulsa.viebit.com/player.php?hash=73buc8l4vxjr)

²⁷ [HTTPS://HCAP.UTSA.EDU/WP-CONTENT/UPLOADS/2020/07/FINAL-TULSA-AND-CINCINNATI-NARRATIVE-ANALYSIS-REPORT-REVISED-5-7-20.PDF](https://hcap.utsa.edu/wp-content/uploads/2020/07/FINAL-TULSA-AND-CINCINNATI-NARRATIVE-ANALYSIS-REPORT-REVISED-5-7-20.pdf)

In June 2020, there was another attempt by the Mayor to engage in conversations with community members about establishing an OIM and CRB.²⁸ Regrettably, those talks failed to take place and created more distrust among some historically marginalized and disparately impacted community members.

Under Chief Franklin’s leadership, TPD has accomplished a portion of what was intended by the five directives outlined by Mayor Bynum in September 2019:

		Trust & Accountability WG
Contract with an outside entity that specializes in participatory research to evaluate Tulsa's community policing program and coordinate with local stakeholders in the development of the City of Tulsa's next phase of community policing activity.	CNA was contracted ²⁹ in July 2020 to conduct community based participatory research to analyze TPDs community policy policies and efforts. The final report ³⁰ was presented to Mayor Bynum and Chief Franklin in March 2022 and the City Council and public at-large in May 2022.	<i>The areas identified for improvement outlined in CNA's research, assessment, analysis and report mirror much of the recommendations outlined by this Working Group.</i>
A comprehensive TPD Annual Report will be submitted to the Mayor and City Council. The Report will capture and make public the information that would have been reported by the OIM, including clear and consistent use-of-force data and demographics, as well as trends, case studies, policy changes and notable officer successes. The goal of the annual report is to empower the Mayor and Council more effectively in their oversight of TPD and for the department to be more transparent and accessible to citizens.	As mentioned earlier in this Working Group Report, an Annual Policing Report for 2019 was published in November 2020.	<i>It is undetermined whether the goal of empowering the Mayor and Council more effectively in their oversight responsibilities and TPD becoming more transparent and accessible to citizens was accomplished by the publication of this report. Ideally, reports for both 2020 and 2021 will be issued before a report for 2022 is produced and published. All reports should be presented to the public consistently on no less than an annual basis.</i>
Formalize the organization, responsibilities, appointment process and meeting schedule for the TPD Citizen Advisory Board and Citizen Action Groups.	TPD has re-established the Citizen Advisory Boards (CABs) for each of the three police divisions: Gilcrease, Mingo Valley and Riverside. These CABs were assembled by application in coordination with Karen Gilbert at Crime Stoppers Tulsa, Chief Franklin and TPD division commanders, without any input from community leaders or the City Council. ³¹	<i>More public information is needed about what considerations were made to select members for the CAB, how long their term(s) of service are, what vetting process was utilized, what responsibilities they have and how often they meet. It is unclear whether the CAB meetings are open to the public and/or if they documented with written and published meeting minutes. Established goals, defined objectives and measurable outcomes for the CABs are also unclear.</i>

²⁸ https://tulsa-world.com/news/bynum-presSES-ahead-with-police-oversight-plan-despite-long-history-of-setbacks/article_c1c98839-1f92-5ae5-bf97-d4f68048dc34.html

²⁹ <https://tulsapolice-news.org/2021-evaluation>

³⁰ <https://img1.wsimg.com/blobby/go/275655a4-71c7-48ff-97ff-725d886c48ac/tulsa%20community%20policing%20evaluation%20report%20-%20f.pdf>

³¹ https://tulsa-world.com/news/local/govt-and-politics/new-police-oversight-programs-create-confusion-questions-for-some-city-councilors/article_315e8e88-14cf-11ec-9534-8f76ec1ca0cb.html

4	Follow through on recommendations related to use of force from the comprehensive study, <i>A Multi-Method Investigation of Officer Decision-Making and Force Used or Avoided in Arrest Situations</i> . ³²	TPD has gone through the recommendation made in <i>A Multi-Method Investigation of Officer Decision-Making and Force Used or Avoided in Arrest Situations</i> and revised its use of K9 officers, amended its Use of Force Incident reporting, and created a Use of Force Review Board.	<i>As mentioned earlier, there are still many questions regarding the Use of Force Review Board that need to be answered so that the public is aware of how the board is being utilized by TPD.</i>
5	Following success with the community resource officer stationed in the 61st and Peoria area, the Mayor has proposed hiring Community Resource Officers for the Gilcrease and Mingo Valley Divisions (the 61st and Peoria area falls within the Riverside Division). Continue the commitment to data-driven decision-making by focusing these officers' work in areas where citizen trust of police is the lowest based on Gallup CitiVoice Index data.	Due to officer attrition and lower rates of hiring new officers for the police department, staffing CROs has been delayed significantly.	<i>New programs such as establishing a Community Engagement Unit and creating a Real Time Information Center utilizing video cameras installed in key locations to surveil the public have been prioritized over embedding dedicated Community Resource Officers in the areas of Tulsa with a low trust of law enforcement. Community conversations continue to ask whether crime reduction tactics will also develop community trust.</i>

As of Summer 2021, TPD had tested tracking citizens by video surveillance that led to a proposal to create and operate a Real Time Information Center. After a visit to the Las Vegas Police Department in February 2022, TPD announced a pilot program to test FLOCK Camera License Plate Readers (LPR) in targeted high crime areas such as E 61st and S Peoria, E 21st and S Garnett, and 46th St N and MLK.³³

There has been no substantial movement towards discussing OIM implementation since Mayor Bynum and Chief Franklin's meeting with community members in June 2020. According to this September 5, 2021, Tulsa World article written by Kevin Canfield, *Nearly 3 years after mayor's proposal, where is Tulsa on police oversight?*, "Mayor G.T. Bynum no longer plans to pursue the creation of an office of the independent monitor over the Tulsa Police Department due to "significant improvements" under Chief Wendell Franklin."³⁴ But then ten days later, on September 15, 2021, in another Tulsa World article written by Kevin Canfield, *New police oversight programs create confusion, questions for some city councilors*, it was reported that Mayor 'Bynum has previously said he has spoken with Franklin about what an independent evaluator of police practices would look like and that that is "absolutely in my mind the next step, further down the road."³⁵

³² <https://hcap.utsa.edu/wp-content/uploads/2020/07/FINAL-TULSA-AND-CINCINNATI-NARRATIVE-ANALYSIS-REPORT-REVISED-5-7-20.PDF>

³³ <https://ktul.com/news/local/surveillance-cameras-planned-for-61st-peoria/>;
https://tulsa-world.com/news/local/article_4e9aa9c4-989a-11ec-ab8b-9fbbe7ded9d9.html

³⁴ https://tulsa-world.com/news/local/govt-and-politics/nearly-3-years-after-mayors-proposal-where-is-tulsa-on-police-oversight/article_e3e17436-0754-11ec-86b0-67ef1e2d8cab.html

³⁵ https://tulsa-world.com/news/local/govt-and-politics/new-police-oversight-programs-create-confusion-questions-for-some-city-councilors/article_315e8e88-14cf-11ec-9534-8f76ec1ca0cb.html

The Tulsa City Council in 2022 did briefly discuss and consider the merits for creating an Office of the Independent Monitor by Charter Amendment which would send the question to a vote of the people in August 2022. That proposal ultimately failed to gain enough Council support and was not approved to move forward in the 2022 Charter Amendment process.

RECOMMENDATIONS:

1. Whether it be an Office of the Independent Monitor (OIM) or an alternative format, the City of Tulsa needs to establish an independent accountability entity that regularly monitors and reviews TPD to increase transparency and accountability in policing. To be effective, this entity must be independent of TPD and tasked with providing police oversight through means of review, audit, and advisement as it pertains to critical and/or controversial incidents that take place between TPD and citizens within the City of Tulsa.
2. Establishing an OIM or similar independent accountability entity can be accomplished by Executive action of the Mayor, a joint effort of the Mayor and Council to pass an ordinance, Council-initiated Charter Amendment, or Citizen petition initiative Charter Amendment. The Mayor and City Council with input from the Tulsa Police Department and citizens of Tulsa must determine which pathway to utilize. Research by this Working Group indicates that cities across the country have implemented their independent oversight entities in a variety of ways and this Working Group recommends that City of Tulsa choose the ordinance approach.
3. This Working Group challenges the Mayor and City Council to complete this policy work in 2022 so that an independent oversight entity can be established in 2023. This effort is especially critical now that a Real Time Information Center (RTIC) has been proposed by both the Mayor and Police Department.
4. This Working Group recommends that the August 2019 proposed ordinance to establish an Officer of the Independent Monitor (OIM) and Citizen Oversight Board (COB) be used as a foundation for re-engaging in this policy work. Furthermore, given the U.S. Supreme Court's *McGirt* decision of 2020, this Working Group proposes that a person with deep legal expertise in Tribal law be part of the requirements for either the Monitor (or equivalent) and/or the Deputy Monitor (or equivalent) to help advise policies that work within the guidelines established by the *McGirt* decision as it pertains to public safety policy and law enforcement within the City of Tulsa.

BUDGETARY IMPLICATIONS:

Estimated \$500K based on initial OIM Budget Proposal from 2019. It is likely this number should be closer to \$750K to ensure full staffing and functionality of a new independent oversight entity.

J. Increase police training on mental health issues, trauma informed care and improving everyday interactions with the public. (Ranked Score 169)

The City Council needs an update from TPD Training Division and more information regarding programs and training already in place. We also need to know what the identified needs are,

proposed programs to meet those needs, and budgetary implications of implementing such programs. See also Item B on Pages 5-6 of this report.

RECOMMENDATION:

1. TPD should look at The University of Oklahoma National Resource Center for Youth Services (NRCYS) training for in-person models regarding trauma-informed responses to youth.

K. Listen and learn about how TPD policies and procedures are experienced across cultures and communities. (Ranked Score 161)

The Council needs an update from TPD's Training Division regarding its Implicit Bias Training and other activities intended to create greater cultural competency for Tulsa Police Officers. When TPD updates their policies and procedures, they need to communicate those changes in an open and transparent manner, including press conferences, town halls, and community meetings. For example, TPD updated its Use of Force policy on February 28, 2022, and published it to their website as an updated PDF on March 1, 2022,³⁶ with very little notice or communication to the public. This is a missed opportunity to engage directly with citizens in a transparent and accountable way. Transparency and accountability measures could go far to increase trust between the public and police. The process is as important as the outcome.

RECOMMENDATIONS:

1. TPD should provide public updates as to how they are actively engaging disparately impacted Tulsans to build trust through transparency and accountability.
2. TPD should establish and facilitate regular community meetings with division leadership and the Citizen Advisory Boards (CAB) that are public to allow citizens to provide direct feedback and input.

L. Involve community members in reducing crime and solving crime. (Ranked Score 148)

Crime Stoppers Tulsa³⁷ has been working with neighborhoods, apartment complexes, and business districts to implement Alert Neighbors strategies. TPD engages with the community at these meetings as well as during other community meetings and town halls organized by TPD or other stakeholders including City of Tulsa as well as the Tulsa City Council.

RECOMMENDATIONS:

³⁶ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167792/POLICY%20MANUAL%2003012022_REDACTED.PDF](https://www.tulsapolice.org/media/167792/policy%20manual%2003012022_redacted.pdf)

³⁷ [HTTP://TULSACRIMESTOPPERS.ORG/](http://tulsacrimestoppers.org/)

1. Continue to publicize these efforts through various channels.
2. Provide Crime Stoppers Alert Neighbor and other crime reduction training materials for training sessions offered in Spanish, Zomi, and Hmong.
3. Continue to work with businesses in higher crime areas to form their own Alert Neighbors Program as well as add smart practices such as using security patrols, cameras, and alarm systems as well as filing Trespass Letters with TPD.

M. Improve diversity in the police force. (Ranked Score 141)

According to TPD's 2019 Annual Report, efforts are underway to diversify the police force. TPD has invested in sending Spanish-speaking recruiters to colleges in the southwest to recruit potential Hispanic officers and they have hosted annual Women in Policing campaign to pique the interest of potential female recruits.³⁸ The following comes from Page 61 of TPD's 2019 Annual Report:

The Tulsa Police Department recruits new officers year around and offers testing 24 times per year. Utilizing an active social media and e-mail campaign along with visiting universities across the country, the Tulsa Police Department is committed to hiring the best and brightest in the nation.

With a responsive website, www.JOINTPD.com, along with 24-hour contact available, the Tulsa Police Department has maintained increased momentum in recruiting where many agencies are struggling.

The Tulsa Police recruiting strategy is centered around hiring the most qualified employees in the country with a focus on matching community demographics regarding female, Hispanic, Black and Asian officers. The greatest disparity for the Tulsa Police Department remains female officers and a strong emphasis has been placed on increasing these high-quality recruits. While policing has traditionally been a male dominated profession, the Tulsa Police Department has taken the steps needed to provide a larger pool of female applicants and to recruit from a diversity of populations.

In 2019, recruiting efforts yielded the following demographics in police applicant testing: 7 Asian, 21 Black, 14 Hispanic, 11 Native American, and 137 Whites. In total, 229 individuals applied and tested to become Tulsa Police Officers in 2019.³⁹

Jesse Guardiola, Tulsa Police Recruitment Officer, has worked with TPD, Tulsa Community College and OSU-Tulsa to launch the Guardian Development Project to create a staffing pipeline for the next generation of police officers in Tulsa.⁴⁰

³⁸ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167252/TPD_2019_Annual_Report.pdf?fbclid=IWAR0oANW--DFBRLUoF0AYTOMa8Z2HQQDEX5C7XSOFXDHQTPGa6TVJ76N8CI](https://www.tulsapolice.org/media/167252/TPD_2019_Annual_Report.pdf?fbclid=IWAR0oANW--DFBRLUoF0AYTOMa8Z2HQQDEX5C7XSOFXDHQTPGa6TVJ76N8CI)

³⁹ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167252/TPD_2019_Annual_Report.pdf](https://www.tulsapolice.org/media/167252/TPD_2019_Annual_Report.pdf)

⁴⁰ [HTTPS://WWW.NEWS0N6.COM/STORY/61BBC2996ADF940BF30D678F/TULSA-POLICE-DEPT-TEAMS-WITH-OSU-TULSA-TO-CREATE-STAFFING-PIPELINE](https://www.newson6.com/story/61bbc2996adf940bf30d678f/tulsa-police-dept-teams-with-osu-tulsa-to-create-staffing-pipeline)

Officer Guardiola has proposed an expansion of the Guardian Development Project⁴¹ in local high schools⁴² with the goal of mentoring students into a career pathway as a Tulsa Police Officer. The approach would be similar to JROTC programs currently succeeding in high schools around the country. The Guardian Development Project would pair participating students with TPD Officers as mentors and work to qualify students for scholarships, allowing students to participate in the Leadership Degree partnership program presently in place with TCC, OSU-Tulsa and TPD as part of the Guardian Development Project.

RECOMMENDATION:

1. The Council should consider using ARPA or other available funds to leverage matching dollars with Tulsa County and/or the State of Oklahoma to pilot expansion of the Guardian Development Project in Tulsa area high schools beginning in the Fall of 2023.
2. It may be that an independent 501(c)3 needs to be formed with an Executive Director and Program Staff to successfully lead the Guardian Development Project efforts since they do not sit entirely within the Tulsa Police Department but also involve Tulsa Community College and Oklahoma State University-Tulsa. This would also free up the organization's ability to fundraise private donations in support of the work including scholarships for the students as well as stipends for officer mentors. JROTC has been very successful in preparing high schoolers to enter the military and it seems that this similar model proposed with expanding the Guardian Development Project into high schools could yield similar results.

N. Study officer personal liability and immunity. (Ranked Score 140)

Unknown effort at this time. Policy discussions are currently taking place at the Federal level. In October 2021, the Supreme Court of the United States ruled in favor of officers accused of excessive force.⁴³

State legislatures are also enacting policy changes related to qualified immunity for law enforcement officers:⁴⁴

Colorado is the first state to statutorily limit the use of qualified immunity as a defense in law enforcement cases at the state level. SB 217 (2020)⁴⁵ created a new civil action for deprivation of rights by law enforcement officers. The law specifically states that qualified immunity is not a defense and limits the applicability of the Colorado Governmental Immunity Act. Connecticut, via HB 6004⁴⁶, also created a new state civil cause of action for

⁴¹ [HTTPS://CITYOFTULSA.VIEBIT.COM/PLAYER.PHP?HASH=KAOQFW18HqSL#](https://cityoftulsa.viebit.com/player.php?hash=KaoQFW18HqSL#)

⁴² [HTTPS://WWW.PUBLICRADIOTULSA.ORG/LOCAL-REGIONAL/2021-05-24/TPD-CONSIDERING-NEW-PROGRAM-TO-RECRUIT-DISADVANTAGED-YOUTHS-OF-COLOR](https://www.publicradiotulsa.org/local-regional/2021-05-24/tpd-considering-new-program-to-recruit-disadvantaged-youths-of-color)

⁴³ [HTTPS://WWW.NPR.ORG/2021/10/18/1047085626/SUPREME-COURT-POLICE-QUALIFIED-IMMUNITY-CASES#:~:TEXT=OFFICERS%20ARE%20SHIELDED%20FROM%20LIABILITY,ARE%20SHIELDED%20FROM%20SUCH%20CASES](https://www.npr.org/2021/10/18/1047085626/supreme-court-police-qualified-immunity-cases#:~:text=Officers%20are%20shielded%20from%20liability,are%20shielded%20from%20such%20cases)

⁴⁴ [HTTPS://WWW.NCSL.ORG/RESEARCH/CIVIL-AND-CRIMINAL-JUSTICE/QUALIFIED-IMMUNITY.ASPX](https://www.ncsl.org/research/civil-and-criminal-justice/qualified-immunity.aspx)

⁴⁵ [HTTPS://CUSTOM.STAENET.COM/PUBLIC/RESOURCES.CGI?ID=ID:BILL:CO2020000S217&CIQ=NCSL&CLIENT_MD=A9EDF9219237F08BF764CFFD5777ACB5&MODE=CURRENT_TEXT](https://custom.statenet.com/public/resources.cgi?id=id:bill:CO2020000S217&ciq=ncsl&client_md=A9EDF9219237F08BF764CFFD5777ACB5&mode=current_text)

⁴⁶ [HTTPS://CUSTOM.STAENET.COM/PUBLIC/RESOURCES.CGI?ID=ID:BILL:CT2020010H6004&CIQ=NCSL&CLIENT_MD=6179605C5197E7AAC9B0F01D223CBF4C&MODE=CURRENT_TEXT](https://custom.statenet.com/public/resources.cgi?id=id:bill:CT2020010H6004&ciq=ncsl&client_md=6179605C5197E7AAC9B0F01D223CBF4C&mode=current_text)

people to seek recourse when an officer deprives them or a class of individuals of the equal protection or privileges and immunities of state law. The law also eliminates governmental immunity as a defense but does not explicitly address qualified immunity in the same way the Colorado law does.

O. Change the uniform and tactics of police to reduce anxiety and remove the appearance of a military presence. (Ranked Score 125)

In a meeting this Working Group had with Chief Franklin in 2021, it was mentioned some forthcoming changes to the uniform policy were to be proposed, but there were no specifics regarding what those changes would be, or if the changes were intended to reduce public anxiety or tone down a militarized appearance.

In 2020, Tulsa Police rolled out new vehicle wraps in a black “One Tulsa” design as reported by Fox23 News:⁴⁷

After 26 years with the same patrol car look, Tulsa police unveiled a brand-new car on Monday afternoon.



“The decision to make this change is symbolic of our determination to move forward progressively and become truly a great city and a great agency,” Chief Wendell Franklin said. The department offered a preview of their new vehicle on Facebook on May 15, 2020.⁴⁸

The new Tulsa flag featured on the now black-colored car, as well as a Route 66 representation and an American flag. The motto “One Tulsa” is on the side of the new car. Chief Franklin says it’s been his motto since he took office in early 2020.

He says “we are all one” when it comes to making Tulsa safe. A group of officers and citizens worked on the new design together.

Reflective tape on the back of the car is meant to help drivers recognize and react to any activity by officers on highways and streets. A car number identifying each officer is on the back and hood of each car to help the air support unit direct officers on scenes. There is also an “inverse police” sticker on the front of the vehicle, which drivers can see when they are stopped to help protect against impersonators. Police say the new vehicle comes at no additional cost to taxpayers as they

⁴⁷ [HTTPS://WWW.FOX23.COM/NEWS/LOCAL/TULSA-POLICE-DEBUT-NEW-VEHICLE-DESIGN/PJB52CLCG5DPDARVOGJRJHLSFI/](https://www.fox23.com/news/local/tulsa-police-debut-new-vehicle-design/PJB52CLCG5DPDARVOGJRJHLSFI/)

⁴⁸ [HTTPS://WWW.FACEBOOK.COM/WATCH/?V=243081560093703](https://www.facebook.com/watch/?v=243081560093703)

stayed within the budget allocated for the vehicles needed for the department. These vehicles will begin to replace current vehicles when there is a need - they aren't rolling out a brand-new fleet of cars for the entire department right now.

It is unclear if this design was created with the intention of lowering public anxiety or reducing a militarized appearance.

RECOMMENDATIONS:

1. Look into various uniform options for police officers and select those that lower public anxiety without compromising officer safety.
2. During collective bargaining, ensure negotiations allow TPD uniforms to be changed to whichever are determined to accomplish lowering public anxiety without compromising officer safety.

P. Educate the public on its role in de-escalation and respecting police officers. (Ranked Score 104)

During the Equality Indicator Special Meetings on Justice, it was stated by TPD representatives that twelve positive interactions with police officers are needed to diminish the effect of one negative interaction. The Community Engagement Unit and other officer efforts work daily to provide citizens with these twelve positive interactions but there is also room to lower negative interactions as well.

According to Michael Ranalli, career police officer, chief, attorney and police trainer for the last 30 years:

"The reality is there are many incidents where, no matter what the officer does, the other person will dictate what happens. But agencies have an obligation to try to minimize those incidents and where possible, produce outcomes that minimize harm."⁴⁹

TPD's Use of Force Policy added the following definition of de-escalation to its Policy Manual in December of 2018:⁵⁰

Taking action or communicating verbally or non-verbally during a potential force encounter in an attempt to stabilize the situation and reduce the immediacy of the threat so that more time, options, and resources can be called upon to resolve the situation without the use of force or with a reduction in the force necessary. De-escalation may include the use of such techniques as command presence, advisements, warnings, verbal persuasion, and tactical repositioning.⁵¹

⁴⁹ [HTTPS://WWW.LEXIPOL.COM/RESOURCES/BLOG/DE-ESCALATION-A-COMMONSENSE-APPROACH/](https://www.lexipol.com/resources/blog/de-escalation-a-commonsense-approach/)

⁵⁰ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/165446/POLICY%20MANUAL082620_R.PDF](https://www.tulsapolice.org/media/165446/policy%20manual082620_r.pdf)

⁵¹ [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167806/POLICY%20MANUAL%2003082022_REDACTED.PDF](https://www.tulsapolice.org/media/167806/policy%20manual%2003082022_redacted.pdf)

TPD's current de-escalation policy is:

Whenever possible and when such delay will not compromise the safety of the officer or another and will not result in the destruction of evidence, escape of a suspect, or commission of a crime, an officer shall allow an individual time and opportunity to submit to verbal commands before force is used. An officer shall use de-escalation techniques and other alternatives to higher levels of force consistent with his or her training whenever possible and appropriate before resorting to force and to reduce the need for force. Officers or employees shall not use tactics solely to justify the escalation of force when such escalation of force would not otherwise be appropriate (e.g., it would not be appropriate for personnel to step in the path of a moving vehicle solely to justify the use of great or deadly force as self-defense).⁵²

Dr. Jennifer Eberhardt, author of *Biased* and an expert panelist on Tulsa's Equality Indicator Special Meeting for Justice on Use of Force, proposes that police departments implement slow down and back-up techniques for de-escalation. She shared statistics for the Oakland Police Department demonstrating that the change in their pursuit policy led to decreased excessive Use of Force incidents. Michael Ranalli agrees, "Essential to all of them [the concepts of de-escalation] is slowing situations down whenever possible. Time can create understanding and additional options to resolve situations."⁵³

RECOMMENDATIONS:

1. It is not the citizen's job to de-escalate police officers. This Working Group recommends that the City of Tulsa, TPD and community partners such as public schools and civic organizations work together to educate the public about their rights as well as what they need to report a crime as well as how to address their public safety needs. Respect between the public and law enforcement must be intentionally cultivated through positive interactions.
2. This Working Group recommends that TPD consider adding the slow down and back-up policy advocated by Dr. Eberhardt to their policy and officer training. Furthermore, the Working Group recommends that the TPD actively share its de-escalation strategies with the public. This approach is also encouraged by the International Association of Chiefs of Police⁵⁴ and Cincinnati Center for Police Research and Policy (the IACP/UC Research Center).⁵⁵ The IACP also produced *A Multi-Method Investigation of Officer Decision-Making and Force Used or Avoided in Arrest Situations: Tulsa, Oklahoma and Cincinnati, Ohio Police Use of Force Narrative Data Analysis Report* in May of 2020.⁵⁶

⁵² [HTTPS://WWW.TULSAPOLICE.ORG/MEDIA/167806/POLICY%20MANUAL%2003082022_REDACTED.PDF](https://www.tulsapolice.org/media/167806/policy%20manual%2003082022_redacted.pdf)

⁵³ [HTTPS://WWW.LEXIPOL.COM/RESOURCES/BLOG/DE-ESCALATION-A-COMMONSENSE-APPROACH/](https://www.lexipol.com/resources/blog/de-escalation-a-commonsense-approach/)

⁵⁴ [HTTPS://WWW.THEIACP.ORG/SITES/DEFAULT/FILES/RESEARCH%20CENTER/COMBINED%20V2.PDF](https://www.theiacp.org/sites/default/files/research%20center/combined%20v2.pdf)

⁵⁵ [HTTPS://WWW.THEIACP.ORG/RESOURCES/DE-ESCALATION-USE-OF-FORCE](https://www.theiacp.org/resources/de-escalation-use-of-force)

⁵⁶ [HTTPS://HCAP.UTSA.EDU/WP-CONTENT/UPLOADS/2020/07/FINAL-TULSA-AND-CINCINNATI-NARRATIVE-ANALYSIS-REPORT-REVISED-5-7-20.PDF](https://hcap.utsa.edu/wp-content/uploads/2020/07/FINAL-TULSA-AND-CINCINNATI-NARRATIVE-ANALYSIS-REPORT-REVISED-5-7-20.pdf)

Q. Implement charter change to require chief of police to be confirmed by city council. (Ranked Score 92)

As of March 30, 2022, the Tulsa City Council rejected a proposed Charter Amendment for the 2022 Municipal Elections giving City Councilors authority to confirm Department Heads appointed by the Mayor to the Classified Service. The proposed amendment giving the Council authority to confirm City Department Heads would have included the Chief of Police in addition to other City of Tulsa Department heads when hired by the Mayor.

In 2020, the voters of Tulsa approved a Charter Amendment to empower the Tulsa City Council to confirm the City Attorney appointed to the Civil Service by the Mayor.

RECOMMENDATION:

1. This Working Group recommends that a Charter Amendment be added to a future Municipal ballot asking voters to empower the Tulsa City Council to confirm City Department Heads appointed to the Civil Service by the Mayor.
2. The City Council confirmed a new City Attorney using this authority for the first time on April 6, 2022. The process was smooth and should be considered as a road map for future confirmations of the City Attorney or any other Department Heads if and when the Council is given the authority to confirm them by a future charter change.

R. Disband police in favor of community service strategies. (Ranked Score 69)

The language for this alternative is unnecessarily inflammatory and does not reflect any policy or strategy the Tulsa City Council is considering or pursuing.

RECOMMENDATION:

This Working Group recommends striking this ranked alternative altogether and did not research any policies related to it.

SPECIAL THANKS

The Trust & Accountability Working Group members would like to thank all those whose time, talent, effort and care went into helping us research and prepare this report and the recommendations contained therein:

Mayor G.T. Bynum

2019-2020 City Council:

Vanessa Hall-Harper, District 1
Jeannie Cue, District 2
Crista Patrick, District 3
Kara Joy McKee, District 4
Cass Fahler, District 5
Connie Dodson, District 6
Lori Decter Wright, District 7
Phil Lakin, District 8
Ben Kimbro, District 9

2020-2022 City Council:

Vanessa Hall-Harper, District 1
Jeannie Cue, District 2
Crista Patrick, District 3
Kara Joy McKee, District 4
Mykey Arthrell-Knezek, District 5
Connie Dodson, District 6
Lori Decter Wright, District 7
Phil Lakin, District 8
Jayme Fowler, District 9

Tulsa City Council Staff

Tulsa Mayor's Office of Resilience and Equity Staff

Tulsa Community Service Council

Chief Wendell Franklin, Director Matt Kirkland, Captain Shellie Siebert
and the Tulsa Police Department

Michael Carter, Sand Springs City Manager

Darita Huckabee

&

The Expert Panelists who participated in the
2019 Equality Indicators: Justice Special Meetings

MAY 25, 2022

TULSA CITY COUNCIL
EQUALITY INDICATORS INITIATIVE:

JUSTICE, TRUST & ACCOUNTABILITY

— IN P O L I C I N G T U L S A N S —

Peer City Data:

Independent Oversight
Organization Types
&
Independent Oversight
Organizational Structures



Peer City Police Accountability Types

City	Population	PD Authorized STR	PD Budget in Millions	Investigative	Review	Audit	Adjudicative	Appeals	Supervisory	Advisory	RTCC
Sand Springs, OK	19,794	37.50	\$4.03		X					X	No
Ogden, UT	86,833	184.00	\$22.00								Yes
Birmingham, AL	200,673	1097.00	\$100.50	X						X	Yes
St. Petersburg, FL	263,255	848.71	\$124.89		X						No
St. Louis, MO	308,626	1706.10	\$133.60		X				X		Yes
Bakersfield, CA	380,874	717.00	\$133.40								No
Tampa, FL	385,430	1245.50	\$163.60		X					X	Yes
Cleveland, OH	385,525	2277.00	\$218.20	X	X						No
Wichita, KS	390,591	902.50	\$102.50		X					X	No
New Orleans, LA	393,292	1552.00	\$193.80		X			X		X	Yes
Arlington, TX	396,394	906.00	\$117.80								No
Tulsa, OK	401,800	1168.00	\$122.70	X	X					X	Proposed
Minneapolis, MN	422,331	4105.81	\$187.00	X		X	X			X	Yes
Oakland, CA	425,195	1160.50	\$335.80	X					X		No
Virginia Beach, VA	450,435	1042.10	\$107.70								No
Miami, FL	463,347	1754.00	\$288.10		X					X	Yes
Omaha, NE	466,893	1059.00	\$170.00					X			No
Kansas City, MO	488,943	1304.00	\$217.79		X		X		X		No
Fresno, CA	527,438	1166.90	\$207.02		X					X	Yes
Albuquerque, NM	558,545	1706.00	\$227.08	X	X			X			Yes
Las Vegas, NV	641,676	3596.00	\$661.80		X						Yes
Nashville, TN	667,560	1999.65	\$331.70		X						Yes
Detroit, MI	673,104	3290.00	\$326.26	X			X		X		Yes
Oklahoma City, OK	681,054	1542.00	\$227.73								
Denver, CO	704,621	1955.07	\$245.90		X					X	Yes
Seattle, WA	724,745	1766.05	\$365.45	X	X	X			X	X	Yes
Fort Worth, TX	874,168	2241.04	\$282.52	X	X	X				X	Yes
Austin, TX	950,715	2508.50	\$443.10		X					X	Yes
Houston, TX	2,312,717	6664.00	\$955.81		X						Yes
New York, NY	8,622,698	50676.00	\$5,400.00	X	X	X					Yes

Data Sources:

<https://policeoversight.uchicago.edu/cities>

<https://atlasofsurveillance.org/real-time-crime-centers>

Peer City Independent Oversight Accountability Organizations

City	Population	PD Authorized Positions	PD Budget in Millions	City Department	Department Budget	Department Staff Positions	Public Commission	Commisson Budget	Commission Staff	Establishment Method	Other	Other Budget	Other Staff	Comments
Sand Springs, OK	19,794	37.50	\$4.03				Independent Monitor Program			PD/CM Policy				
Birmingham, AL	200,673	1,097.00	\$100.50				Civilian Review Board		5	Executive Order				RB members must complete Citizen Police Academy within 1 year of appointment
St. Petersburg, FL	263,255	848.71	\$124.89				Civilian Police Review Committee			Ordinance				
St. Louis, MO	308,626	1,706.10	\$133.60	Board of Police Commissioners			Civilian Oversight Board	\$270,440		BoPC: Charter Oversight Board: Ordinance				BoPC is a civilian elected board that oversees the St. Louis PD and makes policy.
Bakersfield, CA	380,874	717.00	\$133.40											
Tampa, FL	385,430	1,245.50	\$163.60				Citizen Review Board			Ordinance				
Cleveland, OH	385,525	2,277.00	\$218.20	Office of Professional Standards	\$2.05M	15	Civilian Police Review Board	\$182,233	10	Ordinance	Community Police Commission	\$2.12M	18	Established by Consent Decree
Wichita, KS	390,591	902.50	\$102.50				Wichita Citizens Review Board			Ordinance				
New Orleans, LA	393,292	1,552.00	\$193.80	Office of Independent Police Monitor	Approx. \$1 Million	7				Ordinance				
Minneapolis, MN	422,331	4,105.81	\$187.00	Office of Police Conduct Review	\$1.37M		Police Conduct Review Panel			Ordinance	Police Conduct Oversight Commission			
Oakland, CA	425,195	1,160.50	\$335.80	Community Police Review Agency	\$4.5M	14	Police Commission			Ordinance				
Miami, FL	463,347	1,754.00	\$288.10				Civilian Invetigative Panel		6	Ordinance				CIP organized within CM office, no specific budget
Omaha, NE	466,893	1,059.00	\$170.00				Citizen Complaint Review Board			Executive Order				
Kansas City, MO	488,943	1,304.00	\$217.79	Board of Police Commissioners	\$138,104	1				State Statute	Office of Community Complaints	\$541,136	6	
Fresno, CA	527,438	1,166.90	\$207.02	Office of Independent Review	\$287,900	2	Police Reform Implementation Team			OIR: Created in CM office PRIT: Council Resolution				Police Reform Team works to implement community suggested reforms of Fresno PD. Community led process established by former City Councilor to examine PD practices and policies, created a list of changes that the Reform Team is know working to implement.
Albuquerque, NM	558,545	1,706.00	\$227.08	Civilian Police Oversight Agency	\$1.7M	16	Police Oversight Board			Ordinance				
Las Vegas, NV	641,676	3,596.00	\$661.80				Citizen Review Board	\$270,000	2	Ordinance				
Nashville, TN	667,560	1,999.65	\$331.70				Community Oversight Board	\$1.6M	10	Charter				
Detroit, MI	673,104	3,290.00	\$326.26	Board of Police Commissioners	\$3.6M	35				Charter	Office of the Chief Investigator (investigative arm of BoPC)	Shares BoPC budget and staff		BoPC is a civilian board that oversees the Detroit PD and makes rules/policy, approves budget, and has authority to discipline employees
Denver, CO	704,621	1,955.07	\$245.90	Office of the Independent Monitor	\$1.9M	15.5	Citizen Oversight Board			Charter				
Seattle, WA	724,745	1,766.05	\$365.45	Office of Police Accountability	\$5.26M	27	Community Police Commission	\$1.87M	9	Ordinance	Office of the Inspector General for Public Safety	\$3.64	17	Police Commission required by Consent Decree
Fort Worth, TX	874,168	2,241.04	\$282.52	Office of the Police Oversight Monitor	N/A	6				Ordinance				
Austin, TX	950,715	2,508.50	\$443.10	Office of Police Oversight	\$3.66M	12	Community Police Reivew Commission			CM Policy/FOP Contract				
Houston, TX	2,312,717	6,664.00	\$955.81	Office of Policing Reform and Accountability	\$477,975	Part of Legal Dept.	Independent Police Oversight Board		31	IPOB: Executive Order				
New York, NY	8,622,698	50,676.00	\$5,400.00	Civilian Complaint Review Board	\$24.5M	260				Charter	Inspector General for NYPD	\$3.4M	39	

MAY 25, 2022

TULSA CITY COUNCIL
EQUALITY INDICATORS INITIATIVE:

JUSTICE, TRUST & ACCOUNTABILITY

— IN POLICING TULSANS —

Office of the Independent Monitor
Ordinance, 2019 Proposal



(Published in the Tulsa World,
_____, 2019)

ORDINANCE NO. _____

AN ORDINANCE REPLACING IN FULL TITLE 16, TULSA REVISED ORDINANCES, “GENERAL SERVICES DEPARTMENT (REPEALED)” WITH NEW TITLE 16 “OVERSIGHT AND MONITORING OF POLICE DEPARTMENT” CONTAINING CHAPTER 1, SECTIONS 100 THROUGH 104, CREATING THE OFFICE OF INDEPENDENT MONITOR AND CHAPTER 2, SECTIONS 200 THROUGH 208, CREATING THE CITIZEN OVERSIGHT BOARD; ESTABLISHING SEVERABILITY; AND REQUIRING REPEAL OF CONFLICTING ORDINANCES.

BE IT ORDAINED BY THE CITY OF TULSA:

Section 1. That Title 16, Tulsa Revised Ordinances, previously titled “General Services Department (REPEALED)” be and the same is now replaced in full by the enactment of a new Title 16, titled “Oversight and Monitoring of Police Department” to read as follows:

“TITLE 16 OVERSIGHT AND MONITORING OF POLICE DEPARTMENT

CHAPTER 1. OFFICE OF THE INDEPENDENT MONITOR

Section 100. Office of the Independent Monitor.

- A. The Office of the Independent Monitor (OIM) for the City of Tulsa shall consist of a full-time Monitor with appropriate professional, support staff, and, if applicable, contract services. For purposes of this title, ‘Monitor’ means the head of the Office of the Independent Monitor.
- B. The OIM shall actively monitor certain investigations of Tulsa Police Department (TPD) personnel; make recommendations regarding policy issues; provide independent community engagement, outreach, and initial complaint filing assistance in line with best practices and as outlined in this title, and address other issues of concern to the members of the Citizen Oversight Board (COB) created pursuant to Section 201 of this title, the Mayor or Chief of Police.
- C. The Monitor shall establish standards of professional conduct and a comprehensive training program for its own staff in order to review and evaluate whether completed TPD internal investigations have been properly conducted and to make recommendations concerning potential changes in policy, processes and training. Such policy-level recommendations to the Mayor and Chief of Police are non-binding, and management consideration and potential adoption of all or part(s) of such recommendations is pursuant to and in conformance with the Management Rights and Responsibilities set forth and retained pursuant to Article 2 of the Collective Bargaining Agreement between the City and Lodge #93 Fraternal Order of Police

regarding the right to manage the affairs of TPD in all respects including, but not limited to, the introduction of new, improved, or different methods and techniques of TPD operation or change in existing methods and techniques concerning supervision, discipline, use of force, and other policies; rules, regulations and orders; hiring; training; community relations; and the complaint process;

- D. The OIM shall provide policy guidance including, but not limited to, evaluations of community policing strategies employed by the City of Tulsa, best practices from other cities around the country, and other policy objectives as determined by the Mayor, City Council, or Chief of Police.

Section 101. Appointment, qualifications, of Monitor and staff.

- A. The position of Monitor is created to serve in the classified service pursuant to the City Charter and consistent with the City's Personnel Policies and Procedures Section 100, the Mayor shall appoint the Monitor with the assistance of the Personnel Director, the Office of Human Resources and other City personnel designated by the Mayor.
- B. Prior to the appointment of any person to the position of Monitor, the Mayor will appoint a screening committee to initially interview and evaluate candidates for the position. The screening committee shall consist of the following six (6) persons:
 - 1. The chairperson of the COB, who shall be the chairperson of the screening committee;
 - 2. A member of City Council as selected by a majority of the City Council;
 - 3. A current or retired judge as selected by the Mayor subject to approval by a majority of the City Council;
 - 4. The Personnel Director;
 - 5. A person selected by the Mayor, subject to approval by a majority of the City Council, with extensive knowledge of internal police investigations or the monitoring of internal police investigations but who has never been employed by the TPD; and
 - 6. A sworn peace officer selected by the Mayor, subject to approval by a majority of the City Council, who is employed by the TPD. The screening committee's term shall expire upon the selection of the Monitor.
- C. The Personnel Director shall advertise the position of Monitor and certify all applicants meeting the requirements of the position pursuant to the City Charter and consistent with the City's Personnel Policies and Procedures Section 100. The Personnel Director shall present the names of all certified candidates to the screening committee.
- D. The screening committee shall forward to the Mayor the names of a minimum of three (3), but no more than five (5) candidates, for the position of Monitor.

- E. The Mayor shall appoint the Monitor from the list of names provided by the screening committee unless the Mayor decides not to appoint any of those candidates, in which case the Mayor shall request the screening committee to provide additional names.
- F. Deputy Monitors and support staff of the OIM shall be appointed in accordance with the City Charter to serve in the classified service, from candidates certified by the Human Resources Department pursuant to the City Charter and the City's Personnel Policies and Procedures Section 100.
- G. Neither the Monitor, nor any employees of the Monitor's office, shall be or have formerly been employees or reserve officers of the TPD or have any immediate family formerly or currently serving in the TPD, nor shall have served as a peace officer within the Tulsa Metropolitan Statistical Area (MSA) within the last ten years.

Section 102. Mandatory oversight by the Office of the Independent Monitor.

- A. The OIM shall actively monitor any criminal investigation of the incidents set forth below when the investigation is conducted by the TPD. For criminal investigations conducted by the District Attorney or law enforcement agencies of any other jurisdiction, the OIM shall actively monitor and participate in such investigations to the extent permitted by the agency. In addition, the OIM shall actively monitor and review TPD Internal Affairs Section investigations of incidents concerning TPD sworn personnel, including reserve officers, as follows:
 - 1. Any shooting or use of deadly force involving TPD sworn personnel, whether duty related or not;
 - 2. Any in-custody death;
 - 3. Any duty-related incident during which, or as a result of which, anyone dies;
 - 4. Any use of force by TPD sworn personnel resulting in a complaint to the Police Department made by either the person upon which force was utilized or by their personal legal representative;
 - 5. Any incident whether or not duty related, in which TPD sworn personnel, including reserve officers, are under investigation for, or charged by any jurisdiction with a felony;
 - 6. Any incident, whether or not duty-related, in which TPD sworn personnel including reserve officers, are under investigation for, or charged with, any felony crime set forth in Title 21 Oklahoma Statutes, as they may be amended from time to time; or
 - 7. Any incident, whether or not duty-related, in which TPD sworn personnel, including reserve officers, are under investigation for, or charged by, any jurisdiction with a misdemeanor or local law violation in which a use of force (defined as assaulting, beating,

striking, fighting, or inflicting violence on a person) or threatened use of force is an element of the offense.

- B.** In addition, the OIM shall monitor any other internal investigation of possible misconduct by TPD sworn personnel when requested to do so by the Mayor. Within three (3) business days of determining to monitor an investigation or of receiving the request from the Mayor, the OIM shall advise the Chief of Police and the TPD Internal Affairs Section only that the OIM will monitor the completed investigation pursuant to this paragraph.
- C.** The TPD Internal Affairs Section shall forward to the OIM: Within three (3) business days of opening a new internal investigation, summary information regarding that investigation and the nature of the inquiry, allegations or complaint.
- D.** The Chief of Police, upon receipt of a report of completed Internal Affairs Section investigation, shall deliver or cause to be delivered the completed Internal Affairs Section report to the OIM within three (3) business days.
- E.** Upon receipt of the completed Internal Affairs Section report from the Chief of Police, the OIM shall have access to all TPD investigative reports, interviews, evidence and evidence summaries concerning such completed report.
- F.** The OIM, upon receipt of the completed Internal Affairs Section investigation report from the Chief of Police and the documentation, reports and evidence set forth in Subsection 102.E, above, shall undertake review and evaluation of the investigation, and no later than ten (10) business days thereafter shall provide the OIM's written evaluation and monitoring report regarding such Internal Affairs Section investigation to the Chief of Police.
- G.** The Chief of Police shall withhold any determination and decisions regarding the Internal Affairs Section investigation and the subject personnel until the Chief has reviewed and considered the OIM written evaluation and monitoring report, provided that such OIM written evaluation and monitoring report is provided to the Chief on or before the ten (10) business day period contemplated by Subsection 102.F, above. The Chief shall review the OIM evaluation and written report, and recommendations, if any, contained therein. If the OIM evaluation and report recommends additional investigatory action, the Chief may request such action be taken by the Internal Affairs Section and subsequent to such action taken, proceed to make any determinations and decisions regarding the investigation and personnel. If the OIM's evaluation and written report is not received within the time period allowed in this chapter, the Chief shall proceed to make any determinations and decisions regarding the investigation and personnel based upon the Internal Affairs Section investigative report.

Section 103. Public reporting by the Monitor.

- A.** No later than September 30th of each year, the Monitor shall submit an annual public report to the Mayor, City Council, and the COB, setting forth the work of the OIM during the prior fiscal year; identifying trends regarding: complaints and investigations of TPD sworn personnel, including, but without identifying specific persons; information regarding TPD sworn

personnel who were the subject of multiple complaints; complainants who filed multiple complaints; issues that were raised by multiple complaints; and making recommendations regarding the sufficiency of investigations and potential changes to policies, rules, and training.

- B. The report shall present information in statistical and summary form, without identifying specific persons except to the extent that incidents involving specific persons have otherwise been made public by the City.
- C. In addition to the annual report, the OIM shall publish a status report, which shall be available to the public and which shall include, among other things, patterns relating to complaints, and recommendations regarding the sufficiency of investigations. Based upon an analysis of this information and other information available to the Monitor, the OIM shall make timely recommendations to the Mayor and Chief of Police regarding policy issues.
- D. The Monitor may submit additional public reports to the Mayor, City Council, and the COB throughout the year about matters within the duties of the OIM.

Section 104. Confidentiality.

- A. The Monitor, the OIM and its staff, and all persons authorized to act on their behalf who are engaged in the administrative oversight and review process regarding TPD investigative and internal policies and procedures, shall have access to both the confidential law enforcement investigative and internal personnel investigation records and reports to the extent necessary to perform their duties and responsibilities. In addition, the OIM shall not become the custodian of any such law enforcement or internal personnel records and the OIM shall not be allowed access to documents protected by the attorney-client privilege or the attorney work product privilege. All deliberations and recommendations learned by any of those persons or groups during the exercise of their duties shall be confidential and not disclosed to the public unless and until included in and published in a report made pursuant to Section 103.
- B. The Monitor, the OIM and its staff, and all consultants and experts retained by the Monitor and OIM, shall treat all documents and information made available for review by the Monitor regarding specific investigations or officers as confidential except to the extent needed to carry out their duties and shall not at any time provide, disclose, or release TPD, Internal Affairs Section, or any other personnel investigative documents, or any information contained therein.
- C. During the administrative oversight and review of any TPD or other matter, the Monitor, the OIM and its staff, and all consultants and experts retained by the Monitor and OIM, shall not discuss with any person or group, including the members of the COB, the status, or facts, or circumstances of any criminal investigation, other than reporting the fact that a criminal investigation has not been completed and any anticipated date by which a criminal investigation may be completed.

CHAPTER 2. CITIZEN OVERSIGHT BOARD

Section 201. The Citizen Oversight Board.

- A.** There is hereby created the Citizen Oversight Board (COB) pursuant to Article XII, Section 4 of the Amended Charter of the City of Tulsa which provides, in full, as follows:

‘Boards and commissions may be created by ordinance to serve and function in an advisory capacity. The members of boards and commissions shall serve without compensation.’

- B.** The role and responsibility of the COB shall be to:

- 1.** Assess the effectiveness of the Office of Independent Monitor (OIM);
- 2.** Make policy-level recommendations to the Mayor and Chief of Police concerning the Management Rights and Responsibilities set forth and retained pursuant to Article 2 of the Collective Bargaining Agreement between the City and Lodge #93 Fraternal Order of police regarding discipline, use of force, and other policies; rules; hiring; training; community relations; and the complaint process;
- 3.** Address other issues of concern identified by the community, members of the COB, the OIM, the Chief of Police, the City Council or the Mayor; and
- 4.** Exercise such other powers and duties as are set forth in this chapter.

Section 202. Appointment and qualifications of Citizen Oversight Board members.

- A.** The COB shall consist of eleven (11) members, who shall be residents of the City of Tulsa appointed by the Mayor subject to confirmation by the City Council, nine of which shall be comprised of one member from each of the nine City Council Districts, and the remaining two members shall be at-large appointments.
- B.** No officer or employee of the City, nor any currently serving officer of any other law enforcement agency in the State, shall be appointed to the COB.
- C.** Neither the members of the COB nor any of their immediate family members (defined as husband, wife, son, daughter, mother, father, step-son, step-daughter, step-mother, step-father, grandmother, grandfather, brother, sister, domestic partner, and in-laws) shall have ever been employed by the TPD.
- D.** The members of the COB should reflect the diversity of the City of Tulsa, including the ethnic, racial, and socioeconomic constitution of the population, as well as the City’s diverse professional backgrounds, experience, and expertise of its citizens.
- E.** The members of the COB shall not be compensated except for any previously approved and necessary personal expenses incurred in connection with the work of the COB.

- F. The members of the COB shall participate in an appropriate training program to be established by the COB working with the OIM so that COB members shall possess the applicable knowledge to perform their duties.

Section 203. Terms and vacancies.

- A. The terms of the nine members of the COB comprised of one member from each of the nine City Council Election Districts shall commence on the first Monday in December in the year 2019 and shall expire as follows: the term of office for members from Election Districts 1, 4, and 7 shall serve for a term of one (1) year and shall expire on the first Monday in December 2020; thereafter the members from Election Districts 1, 4, and 7 shall serve for a term of three (3) years. The term of office for members from Election Districts 2, 5, and 8 shall be for a term of two (2) years and shall expire on the first Monday in December in the year 2021; thereafter the members from Election District 2, 5, and 8 shall serve for a term of three (3) years. The term of office for members from Election Districts 3, 6, and 9 and shall be for a term of three (3) years and shall expire on the first Monday in December in the year 2022; thereafter the members from Election Districts 3, 6, and 9 shall be for a term of three (3) years.
- B. The terms of the two at-large COB members shall be for three years commencing on the first Monday in December in the year 2019.
- C. Any vacancy occurring during the term of any COB member shall be filled by appointment by the Mayor and confirmed by City Council pursuant and subject to the requirements of Article XII, Section 11 of the Amended Charter of the City of Tulsa.
- D. In the event of vacancies on the COB, appointments to fill such vacancies shall be for the remainder of the unexpired terms. A member of the COB shall have vacated his or her position on the Board if such member fails to attend three (3) consecutive meetings; provided that a vacancy so created shall not prohibit the reappointment of such member to the COB.
- E. Each COB member shall continue to serve in such capacity until the member's successor has been duly appointed.

Section 204. Officers.

The COB shall annually elect from among its members a chairperson and a vice-chairperson, who shall serve in such capacities until their successors are duly elected. In case of a vacancy in either of these positions, the COB shall elect a successor who shall serve the unexpired balance of the predecessor's term.

Section 205. Meetings of the Citizen Oversight Board.

- A. The COB, with staff support provided by the OIM, shall conduct at least three (3) meetings annually for public comment, including a meeting to be held not later than thirty (30) calendar days after the issuance of the COB's annual report and shall from time to time meet with citizens' groups to learn of citizens' concerns and to inform the citizens of relevant information

regarding the activities of the TPD, the OIM, and the COB. After consideration of citizen accessibility factors, the COB shall schedule all meetings under this subsection at times and dates as convenient as possible for citizen attendance.

- B. The COB shall meet at least ten times per year with a representative or representatives of the OIM.
- C. The COB shall meet at least quarterly in public with the Chief of Police and shall meet with any other City personnel on an as-needed basis to discuss any issues of concern and to discuss and formulate and make policy recommendations for ways that the police department and its officers can improve its relationships with the citizens.
- D. The COB shall fix the time and place of its meetings.
- E. The COB shall maintain records of its meetings, which records shall be available to the public.
- F. All meetings of the COB shall be subject to the provisions of the Oklahoma Open Meetings Act.

Section 206. Interaction between the Office of Independent Monitor and the Citizen Oversight Board.

The OIM shall inform the COB of the status of police department investigations and the actions of the OIM and the Monitor in monitoring, reviewing and evaluating those investigations.

- A. The COB shall establish both qualitative and quantitative criteria for evaluating the effectiveness of the OIM.
- B. In determining whether the Office of Independent Monitor is effectively monitoring police investigations, the COB shall receive regular reports from the Office of Independent Monitor and may request to review appropriate documents and reports necessary to carry out the COB's duties and responsibilities. However, the COB shall not become the custodian of any such law enforcement or internal personnel investigative records and the COB shall not be allowed access to documents protected by the attorney-client privilege or the attorney work product privilege. The COB shall make recommendations to the Mayor and Chief of Police regarding the performance and effectiveness of the OIM and the Monitor and assist with public engagement and feedback.
- C. The OIM shall provide staff support to the COB.

Section 207. Reports of the Citizen Oversight Board.

- A. The COB shall furnish an annual public report to the Mayor and City Council regarding the COB's assessment of the work of the OIM; the COB's activities during the preceding year; concerns expressed by citizens; the COB's assessment of the police department's investigative

processes and recommendations for ways that TPD can improve its relationships with the citizens.

- B. The COB’s annual report shall be furnished concurrently with the OIM’s annual report to the Mayor and City Council.
- C. In addition to the annual report, the COB may furnish additional reports, to the Mayor and City Council, which shall be available to the public and which shall include, but not be limited to, patterns relating to complaints and recommendations regarding the sufficiency of investigations, if any.
- D. Upon request of the COB, the Mayor shall consider contracting with independent consultants to assist the COB in assessing the effectiveness of the OIM and the Monitor, and in preparing the COB’s annual report and any other reports.

Section 208. Rules.

The COB shall publish and make available to the public such procedural rules as it may adopt for the conduct of its business.”

Section 2. SEVERABILITY CLAUSE: If any section, sentence, clause or phrase of this ordinance or any part thereof is for any reason found to be invalid by a court of competent jurisdiction, such decision shall not affect the validity of the remainder of this ordinance or any part thereof

Section 3. REPEAL OF CONFLICTING ORDINANCES. That all ordinances or parts of ordinances in conflict herewith be and the same are now expressly repealed.

ADOPTED, by the Council on this _____ day of _____ 2019.

Chair of the Council

OFFICE OF THE MAYOR

Received by the Mayor: _____, at _____.
Date Time

G.T. Bynum, Mayor

By: _____
Secretary

APPROVED by the Mayor of the City of Tulsa, Oklahoma: _____,
Date

at _____.
Time

Mayor

ATTEST:

City Clerk

APPROVED AS TO FORM AND LEGALITY:

City Attorney