

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:15-CV-01046
	)	
Plaintiff,	)	
	)	JUDGE SOLOMON OLIVER, JR.
vs.	)	
	)	<b><u>NOTICE SUBMITTING</u></b>
CITY OF CLEVELAND	)	<b><u>MEMORANDUM REGARDING</u></b>
	)	<b><u>UPCOMING AUDITS AND</u></b>
Defendant.	)	<b><u>METHODOLOGIES</u></b>
	)	
	)	

The Monitoring Team respectfully submits this Memorandum Regarding Upcoming Audits and Methodologies, which details the methodologies supporting the Monitoring Teams’ audits of Use of Force (pursuant to Paragraphs 46 through 92 of the Consent Decree), the Office of Professional Standards (“OPS”) and the Police Review Board (“PRB”) management of civilian complaints (pursuant to Paragraphs 193 through 239 of the Consent Decree), and the newly implemented Force Review Board (pursuant to Paragraphs 124 through 130 of the Consent Decree and this Court’s Order at Docket No. 317).

The Monitoring Team and the parties have collaborated on the development of these methodologies and have discussed the most efficient mechanisms for the Monitoring Team to receive and review the relevant documents and associated video. Additionally, the review of Use of Force cases will be conducted in concert with the parties, who will review the same cases (or a sample of those cases) as the Monitoring Team on a monthly basis. This parallel review will allow for real-time

feedback and robust discussion of problematic cases as the audit progresses. This will eliminate debates on the back end about how the Monitoring Team came to its conclusions and provide continual technical assistance. This approach has proven effective in other jurisdictions and maximizes the value of the assessment.

The timelines associated with these audits is ambitious, but the Monitoring Team believes the process will be best served with a focus on assessments at this stage of the Consent Decree.

Respectfully submitted,

/s/ Hassan Aden

HASSAN ADEN  
Monitor  
The Aden Group LLC  
8022 Fairfax Road  
Alexandria, VA 22308  
Tel: (571) 274-7821  
Email: aden@theadengroup.com

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2020, I served the foregoing document entitled **NOTICE SUBMITTING MEMORANDUM REGARDING UPCOMING AUDITS AND METHODOLOGIES** via the court's ECF system to all counsel of record.

/s/ Ayesha Hardaway  
AYESHA HARDAWAY