



CITY OF PORTLAND, OREGON



Bureau of Police

Ted Wheeler, Mayor

Charles Lovell, Chief of Police

1111 S.W. 2nd Avenue • Portland, OR 97204 • Phone: 503-823-0000

Integrity • Compassion • Accountability • Respect • Excellence • Service

Executive Summary

Directive 0750.00, Bureau Cooperation with the Federal Bureau of Investigation's Joint Terrorism Task Force Executive Summary

Introduction

The Portland Police Bureau (PPB) established Directive 0750.00, Bureau Cooperation with the Federal Bureau of Investigation's (FBI) Joint Terrorism Task Force (JTTF), in accordance with City Council's 2019 Resolution 37424, "Establish parameters of cooperation between Portland Police Bureau and the Federal Bureau of Investigation's Joint Terrorism Task Force. The directive sets forth the procedures for the Bureau's coordination with the JTTF.

Public Comments

The PPB received limited feedback during the universal review periods. The responses ranged from suggestions that the Bureau expand its cooperation with the JTTF and other law enforcement agencies to recommendations that City Council limit the Bureau's collaboration with the task force. The comments also included some recommendations the Bureau addressed during its last review of the directive. The previous executive summary is located [here](#).

The Bureau's Revised Policy

The Bureau made minimal revisions to the policy in an effort to maintain consistency and compliance with the existing City Council resolution. The amended policy emphasizes the existing requirement regarding consultation with the City Attorney's Office for any questions about the application of the directive.

While the Bureau received feedback in which some community members expressed continued apprehension about the Bureau's collaboration with the JTTF, City Council has not modified the parameters or altered the extent to which the two entities work with each other. The Bureau shall continue to adhere to the direction provided by City Council through the 2019 resolution.

We thank every individual who took the time to provide feedback on this directive. All comments received during both review periods are attached at the end of this document. The Bureau welcomes further feedback on this policy during its next review.

This directive goes into effect on September 2, 2021. Published on August 3, 2021.

Community Policing: Making the Difference Together
An Equal Opportunity Employer

City Information Line: 503-823-4000, TTY (for hearing and speech impaired): 503-823-6868 Website: www.portlandpolice.com

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Police Information Line: 503-823-4636, TTY (for hearing and speech impaired): 503-823-4736 Website: <http://www.portlandpolicebureau.com>

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0750.00, Bureau Cooperation with the Federal Bureau of Investigation's Joint Terrorism Task Force

Refer:

- ORS 181A.250 Specific information not to be collected or maintained
- ORS 181A.820 Enforcement of federal immigration laws
- City of Portland Resolution No. 37415, Authorize Withdrawal of Portland Police Bureau Officers from the Federal Joint Terrorism Task Force and establish protocols for cooperating with the FBI on terrorism investigation on a case-by-case basis
- City of Portland Resolution No. 37424 as amended, Establish Parameters of Cooperation Between Portland Police Bureau and the Federal Bureau of Investigation's Joint Terrorism Task Force
- DIR 0310.70, Dissemination of Information
- DIR 0631.30, Cooperation with Other Agencies
- DIR 0810.10, Bureau Contact with Members of Immigrant Communities and Individuals with Diplomatic Immunity

Definitions:

- Terrorism: Activities that A) involve acts dangerous to human life that are a violation of the criminal laws of the United States or of any State; and B) appear to be intended (i) to intimidate or coerce a civilian population; (ii) to influence the policy of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination, or kidnapping.

Policy:

1. This directive establishes procedures for the Portland Police Bureau's cooperation with the Federal Bureau of Investigation's Joint Terrorism Task Force (JTTF).
2. In accordance with Oregon state law, the Bureau shall not collect or maintain information about the political, religious or social views, associations or activities of any individual, group, association, organization, corporation, business or partnership unless such information directly relates to an investigation of criminal activities, and there are reasonable grounds to suspect the subject of the information is or may be involved in criminal conduct.

Procedure:

1. Temporary Joint Terrorism Task Force Assignments.
 - 1.1. The Chief may, upon request of the Portland Federal Bureau of Investigation (FBI) Special Agent in Charge (SAC), temporarily assign Bureau members to work with the Portland FBI JTTF to assist in the investigation of any individual suspected cases of terrorism and/or threats to life, including hate crimes, in or having a direct nexus to the City of Portland where there are reasonable grounds to suspect the subject of the information is or may be involved in criminal conduct.
 - 1.2. The Chief of Police and any Bureau member temporarily assigned to the JTTF shall seek legal advice from the City Attorney whenever the Chief or the officer has a question about the application of Directive 750.00, Bureau Cooperation with the Federal Bureau

of Investigation's Joint Terrorism Task Force, City of Portland Resolution 37424 as Amended, or the laws of the State of Oregon, including Oregon Revised Statute (ORS) 181A.250 and ORS 181A.820, as related to their temporarily assigned work with the JTTF. Any consultation with the City Attorney shall be undertaken consistent with the requirements for the handling of classified information and with the other legal restrictions on the dissemination of information. In the event disclosure of classified information is necessary for the City Attorney to provide appropriate legal advice, the Chief of Police shall request the FBI SAC to authorize the City Attorney to receive such information pursuant to a non-disclosure agreement. If the City Attorney cannot obtain the necessary information to provide legal advice, the City Attorney shall notify the Chief of Police and the Commissioner-in-Charge of the Bureau, who may require the withdrawal of Bureau members from their temporary assignment(s).

2. Information Sharing Across Agencies.

2.1. The Chief of Police, while remaining in compliance with Oregon State law, shall request that the FBI JTTF share any and all information related to terrorism and/or threats to life, including hate crimes, pertinent to the health, safety and welfare of all people who reside, work, worship, attend school in, and/or recreate in the City of Portland.

2.2. The Chief of Police shall request that any such information that requires Bureau action be immediately shared with the Bureau's Criminal Intelligence Unit (CIU) for review and investigative action.

2.3. The Chief of Police shall direct members of CIU to immediately share any information regarding the threat of terrorism with the JTTF, in compliance with Oregon State law.

2.4. In accordance with Directive 810.10, Bureau Contact with Members of Immigrant Communities and Individuals with Diplomatic Immunity, Bureau members shall not provide any information for the purpose of federal immigration law enforcement.

2.5. The sharing of information or follow up information by CIU officers shall not constitute a temporary assignment to the Portland FBI JTTF.

3. Joint Terrorism Task Force Coordination.

3.1. The Chief or Deputy Chief shall serve as the liaison to the FBI JTTF.

4. Member Training.

4.1. Bureau members temporarily assigned to work with the JTTF shall attend annual training conducted by the City Attorney's Office to ensure compliance with applicable state and federal laws.

5. Reporting.

5.1. Bureau members receiving information about terrorism shall document the information and provide it to CIU for review, investigation, and sharing with the FBI JTTF.

5.2. The Bureau shall report to City Council on an annual basis, by the end of January, with information detailing the frequency with which the FBI's SAC requested the assignment

of PPB CIU officers for an investigation; the number of cases that were referred to the PPB by the FBI; the number of cases that were referred to the FBI by the PPB; the nature of closed cases referred to the PPB by the FBI, including the demographics of persons involved; and the disposition of those cases.

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Bureau of Investigation's Joint Terrorism Task Force, City of Portland Resolution 37424 Aas Amended, or the laws of the State of Oregon, including Oregon Revised Statute (ORS) 181A.250 and ORS 181A.820, as related to their temporarily assigned work with the JTTF. Any consultation with the City Attorney shall be undertaken consistent with the requirements for the handling of classified information and with the other legal restrictions on the dissemination of information. In the event disclosure of classified information is necessary for the City Attorney to provide appropriate legal advice, the Chief of Police shall request the FBI SAC to authorize the City Attorney to receive such information pursuant to a non-disclosure agreement. If the City Attorney cannot obtain the necessary information to provide legal advice, the City Attorney shall notify the Chief of Police and the Commissioner-in-Charge of the Bureau, who may require the withdrawal of Bureau members from their temporary assignment(s).

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- 2.1. The Chief of Police, while remaining in compliance with Oregon State law, shall request that the FBI JTTF share any and all information related to terrorism and/or threats to life, including hate crimes, pertinent to the health, safety and welfare of all people who reside, work, worship, attend school in, and/or recreate in the City of Portland.
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- 2.4. In accordance with Directive 810.10, Bureau Contact with Members of Immigrant Communities and Individuals with Diplomatic Immunity, Bureau members shall not provide any information for the purpose of federal immigration law enforcement.
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#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, January 15, 2021 9:07:27 AM
Last Modified: Friday, January 15, 2021 9:07:46 AM
Time Spent: 00:00:19

Page 1

Q1

Please provide feedback for this directive

test

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, January 15, 2021 5:41:50 PM
Last Modified: Friday, January 15, 2021 5:44:24 PM
Time Spent: 00:02:34

Page 1

Q1

Please provide feedback for this directive

The PPB should be in partnership with ALL other law enforcement agencies.
Information, obviously, should only be collected and shared of individuals and/or organizations that are under investigation.
This is a no brainer.

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name **jcsaubert@hotmail.com**

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, January 16, 2021 5:57:03 PM
Last Modified: Saturday, January 16, 2021 5:59:49 PM
Time Spent: 00:02:45

Page 1

Q1

Please provide feedback for this directive

So often we see white men committing what could be classified as "terrorist acts," and not being labeled that way. But when a Black or brown people pose the smallest threat (not even committing an act of terror), they are either killed or the penalty is grossly disproportionate to white criminals. The increased use of the word "domestic terrorism," and PPB's work with the terrorist task force, will without a doubt have a more negative impact on Black and brown communities.

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name **R. Ochs**

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, January 29, 2021 11:51:31 AM
Last Modified: Friday, January 29, 2021 11:51:50 AM
Time Spent: 00:00:19

Page 1

Q1

Please provide feedback for this directive

COMMENTS on Joint Terrorism Task Force Directive, January 2021

From: Peace and Justice Works / Portland Copwatch

To: Chief Lovell, the PPB Directives Team, Mayor Wheeler and Commissioners Hardesty, Mapps, Rubio and Ryan

cc: Compliance Officer/Community Liaison Team, Portland Committee on Community Engaged Policing, US Dept. of Justice, Citizen Review Committee, the Portland Police Bureau and members of the public and the media

To Chief Lovell, the PPB Directives Team, Mayor Wheeler and Commissioners Hardesty, Mapps, Rubio and Ryan:

Our organization continues to be involved in the efforts to limit or end Portland Police Bureau cooperation with the FBI's Joint Terrorism Task Force (JTTF). One provision of the May 2019 resolution after the Council limited cooperation to a "case by case basis" was for the Bureau to draw up a policy (Directive) describing the City's relationship to the JTTF. In July, 2019, we submitted comments about the policy (#750.00), one of which was adopted by the Bureau.*-1

However, the Bureau did not address our proposal to add these two Sections to the Directive*-2 in order to further assure that the reasons for withdrawing officers are safeguarded by this policy:

4.2 Any training material the FBI provides to PPB task force members will also be provided to and maintained by the City Attorney's office (in accordance with the provisions of Section 1.2).

4.3 Any training that is discriminatory and biased against any group shall be immediately reported to the City Attorney and will be a basis for not participating in the JTTF (in accordance with the provisions of Section 1.2).

We also would suggest that, even though the Resolution does not require it, the Bureau should add a provision in the Directive which adds detailed information about the cases sent by the PPB to the FBI which is reflective of the details of the FBI cases sent to the PPB (Section 5.2), including demographics and outcomes. The Bureau has voluntarily offered some of this information for the past two years but it should be expanded and memorialized.

We repeat here that the language reflected in Section 1.2 is based on an unacceptably broad policy set by Council in the Resolution. That language says the Chief can:

assign PPB officers to work with the Portland FBI JTTF to assist in the investigation of any individual suspected cases of terrorism and/or threats to life, including hate crimes, in or having a direct nexus to the City of Portland where there is reasonable grounds to suspect the subject of the information is or may be involved in criminal conduct.

This is language we warned the Council could allow the PPB to work with the FBI's task force dozens or maybe hundreds of times per year if there are cases in which anyone's life is threatened or a hate crime is committed, as opposed to the handful of cases the PPB works on with the FBI now.

0750.00 Directive Feedback (1UR)

Finally, it may not be appropriate for a Bureau Directive, but we would like to see a commitment to hearing public feedback both about the Report and at City Council. Sgt. Simpson acknowledged integrating community feedback into this year's Report. Mayor Wheeler continues to claim the City has a "practice" of not hearing public testimony on Reports, even though City Code allows the presiding officer discretion to do so.*-3 The Bureau has pledged openness and transparency including community dialogue and allowing discussion in person at the Council hearing would illustrate this commitment.

Despite the FBI's newfound interest in recognizing the dangers of white supremacists to this country, we disagree with broadly labeling political ideology as "terrorism" as it will inevitably snap back on people of color, immigrants, Muslims and progressive activists. Moreover, IT is still not clear why a Terrorism Task Force would be interested in every threat to life that might happen in Portland absent the qualities which would make that threat a form of terrorism, or how hate crimes by themselves automatically come under the rubric of terrorism. At Council, Sgt. Simpson noted that the PPB works with law enforcement partners on individual cases without needing to be part of specific task forces. That is the model we recommend around criminal acts which some call "terrorism." As we did with Chief Outlaw, we urge Chief Lovell, who has the discretion to accept or reject in any case the FBI asks for assistance (Sections 1.1 and 3.1), to err on the side of caution. The many organizations who objected to the PPB working with the FBI raised recent and long-term concerns about how the secretive federal agency tends to target vulnerable populations.

Thank you for your consideration

Dan Handelman and other members of
Peace and Justice Works/Portland Copwatch

*1- The Bureau added the words "in compliance with Oregon State law" to Section 2.3 about restricting officers' information sharing with the JTTF.

*2-We have modified the previous proposed language slightly.

*3-City Code 3.02.040 (G)(5) <https://www.portlandoregon.gov/citycode/article/636383>

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name

Portland Copwatch

From: [Peace and Justice Works](#)
To: [Lovell, Charles](#); [Parman, Bryan](#); [Directives, Police Bureau](#); [Commissioner Rubio](#); [Commissioner Ryan Office](#); [Commissioner Hardesty](#); [Commissioner Mapps](#); [Wheeler, Mayor](#); [Portland Copwatch](#)
Cc: [Morgan, Craig](#); [Dennis Rosenbaum](#); [Claudio, Claudia](#); [PCCEP Info](#); [Auditor, CRC Mail](#); [Auditor, IPR Mail](#); [Hull Caballero, Mary](#); [Grant, Nicole](#); [TAC, Police Bureau](#); [Geissler, Jonas](#); [Hager, Jared](#); [News Media](#)
Subject: [User Approved] COMMENTS on Joint Terrorism Task Force Directive, January 2021
Date: Thursday, February 11, 2021 3:15:47 PM

From: Peace and Justice Works / Portland Copwatch

To: Chief Lovell, the PPB Directives Team, Mayor Wheeler and Commissioners Hardesty, Mapps, Rubio and Ryan

cc: Compliance Officer/Community Liaison Team, Portland Committee on Community Engaged Policing, US Dept. of Justice, Citizen Review Committee, the Portland Police Bureau and members of the public and the media

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Finally, it may not be appropriate for a Bureau Directive, but we would like to see a commitment to hearing public feedback both about the Report and at City Council. Sgt. Simpson acknowledged integrating community feedback into this year's Report. Mayor Wheeler continues to claim the City has a "practice" of not hearing public testimony on Reports, even though City Code allows the presiding officer discretion to do so.*-3 The Bureau has pledged openness and transparency including community dialogue and allowing discussion in person at the Council hearing would illustrate this commitment.

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*2-We have modified the previous proposed language slightly.

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<https://www.portlandoregon.gov/citycode/article/636383>

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Cc: [Lovell, Charles](#); [Parman, Bryan](#); [Directives, Police Bureau](#); [Commissioner Rubio](#); [Commissioner Ryan Office](#); [Commissioner Hardesty](#); [Commissioner Mapps](#); [Wheeler, Mayor](#); [Morgan, Craig](#); [Dennis Rosenbaum](#); [Claudio, Claudia](#); [PCCEP Info](#); [Auditor, CRC Mail](#); [Auditor, IPR Mail](#); [Adams, Sam](#); [Bradley, Derek](#); [Lawrence, Asena](#); [Carney, Shannon](#); [Gadberry, Liz](#); [Cynthia Castro](#); [Hull Caballero, Mary](#); [TAC, Police Bureau](#); [Geissler, Jonas](#); [Hager, Jared](#); [News Media](#)
Subject: COMMENTS on Joint Terrorism Task Force and Bias Crime Directives, April 2021
Date: Thursday, April 29, 2021 11:17:39 AM

COMMENTS on Joint Terrorism Task Force and Bias Crime Directives, April 2021

To Chief Lovell, members of City Council, Capt. Parman, Lieutenant Morgan, PPB Policy Analysts, Sgt. Simpson, Compliance Officer/Community Liaison Team, Portland Committee on Community Engaged Policing, US Dept. of Justice, Citizen Review Committee and the Portland Police Bureau:

Below are comments from Portland Copwatch (PCW) on the Joint Terrorism Task Force and Bias Crimes Directives posted in April for comment (<https://www.portlandoregon.gov/police/73677>). We sent our original comments on the JTTF policy to City Council under the umbrella of our parent group, Peace and Justice Works. We repeat those comments here with a slight modification based on the Bureau's one proposed substantive change.

An overall note about the JTTF policy: There are provisions limiting officers' cooperation with the FBI to match the restrictions in state law. Given how many other federal Task Forces the Bureau is involved in, including the new Metro Safe Streets Task Force, it would be good to make clear that these restrictions apply to those other officers-- at least, we hope that they do. Side note: It recently came to our attention that the FBI refers to the new gun violence task force as the "Violent Gang Task Force," which goes against Portland's recognition that not all gun violence has to do with "gangs." The City should talk to their federal partners about this nomenclature.

As we have noted in the past, we feel the Directives would be easier to read and refer to if the Bureau would assign letters and numbers to all sections, including the "Refer" and "Definitions" sections. The references below are to Procedure Section unless otherwise noted.

DIRECTIVE 750.00 Bureau Cooperation with the FBI's Joint Terrorism Task Force (previous comments January 2021)

Our organization continues to be involved in the efforts to limit or end Portland Police Bureau cooperation with the FBI's Joint Terrorism Task Force (JTTF). One provision of the May 2019 resolution after the Council limited cooperation to a "case by case basis" was for the Bureau to draw up a policy (Directive) describing the City's relationship to the JTTF.

--Though we made comments both in July 2019 and January of this year, the Bureau has still not addressed our proposal to add two new sections to the Directive in order to further assure that the reasons for withdrawing officers are safeguarded by this policy:

4.2 Any training material the FBI provides to PPB task force members will also be provided to and maintained by the City Attorney's office (in accordance with the provisions of Section 1.2).

4.3 Any training that is discriminatory and biased against any group shall be immediately reported to the City Attorney and will be a basis for not participating in the JTTF (in accordance with the provisions of Section 1.2).

--We continue to recommend that, even though the Resolution does not require it, the Bureau should add a provision in the Directive which adds detailed information about the cases sent by the PPB to the FBI which is reflective of the details of the FBI cases sent to the PPB (Section 5.2), including demographics and outcomes. The Bureau has voluntarily offered some of this information for the past two years but it should be expanded and memorialized.

--We welcome the new language proposed in Section 1.2 allowing the Chief to ask for legal advice from the City Attorney about JTTF activity. This raises, once again, the issue that the Chief's supervisor, the Police Commissioner, is not given security clearance to oversee officers who are deputized as part of the JTTF.

--We repeat once more that the language reflected in Section 1.2 is based on an unacceptably broad policy set by Council in the Resolution. That language says the Chief can:

assign PPB officers to work with the Portland FBI JTTF to assist in the investigation of any individual suspected cases of terrorism and/or threats to life, including hate crimes, in or having a direct nexus to the City of Portland where there is reasonable grounds to suspect the subject of the information is or may be involved in criminal conduct.

As we warned the Council, this language could allow the PPB to work with the FBI's task force dozens or maybe hundreds of times per year if there are cases in which anyone's life is threatened or a hate crime is committed, as opposed to the handful of cases the PPB works on with the FBI now.

--Finally, it may not be appropriate for a Bureau Directive, but we would like to see a commitment to hearing public feedback both about the Report and at City Council. Sgt. Simpson acknowledged integrating community feedback into this year's Report. Mayor Wheeler continues to claim the City has a "practice" of not hearing public testimony on Reports, even though City Code allows the presiding officer discretion to do so (City Code 3.02.040 [G][5]), and we have pointed out that at JTTF Reports to Council in 2012-2015, public testimony was taken. The Bureau has pledged openness and transparency. Including community dialogue and allowing discussion in person at the Council hearing would illustrate this commitment.

Despite the FBI's recent pledge to focus more on the dangers of white supremacists to this country, we disagree with broadly labeling political ideology as "terrorism" as it will inevitably snap back on people of color, immigrants, Muslims and nonviolent activists as has been proven by history. Moreover, it is still not clear why a Terrorism

Task Force would be interested in every threat to life that might happen in Portland absent the qualities which would make that threat a form of terrorism, or how hate crimes by themselves automatically come under the rubric of terrorism. At Council in January, Sgt. Simpson noted that the PPB works with law enforcement partners on individual cases without needing to be part of specific task forces. That is the model we recommend around criminal acts which some call "terrorism." As we did with Chief Outlaw, we urge Chief Lovell, who has the discretion to accept or reject any case in which the FBI asks for assistance (Sections 1.1 and 3.1), to err on the side of caution. The many organizations who objected to the PPB working with the FBI raised recent and long-term concerns about how the secretive federal agency tends to target vulnerable populations.

DIRECTIVE 640.80 Bias Crime Reporting
(formerly Mandatory Bias/Prejudice Crime Reporting)
previous comments made November 2015 and March 2020

This Directive has been nearly entirely rewritten, but we are basing these comments in part on the ones we made in March 2020.

An overall comment on this policy: While the PPB aims to make themselves more open and available to members of the public who have been targeted because of their "race, color, religion, gender identity, sexual orientation, disability or national origin" (Definitions), many people feel that the Bureau itself commits crimes or otherwise targets community members based on these characteristics, and that should be acknowledged in the Directive and in the future.

Here are specific comments on the policy:

--First, we recognize that gender identity has been added to the Directive as a characteristic that can be part of a bias crime. However, it was not likely done in response to Portland Copwatch's comments, but rather because the state laws on Bias Crimes (ORS 166.155 and 166.165) were changed in 2019 to include gender identity.

--On that note, the Directive lists only the crimes of Assault, Menacing, Harassment and Criminal Mischief as possible bias crimes, (Definitions and Section 1.2) while the statutes speak of physical injury. Presumably this would include murder, attempted murder and other such crimes which are motivated by bias.

--It is good to see that the Bureau has made it mandatory for officers to report bias incidents which do not meet the statutes' definitions of crime (Section 3.4).

--Policy Section 1 talks about a "swift and strong response by law enforcement" after incidents; we fear this will be read as a license to "kick some butt," and suggest the phrase "timely and thorough" instead.

--In Policy Section 2 and elsewhere, the person subjected to criminal activity is listed as a "victim," but it may be worth referring to them as the "victim/survivor" so as not to perpetuate people's sense of victimization as they respond to the crimes and live their lives.

--Language from the original Directive about being "sensitive" to victims/survivors has been removed to talk about a "victim-centered approach." PCW previously suggested adding language which should probably still go in the Policy section: "Members will conduct themselves in a compassionate, professional manner with all due care and concern for the dignity and needs of all persons involved in the investigation."

--Other language pointing to members of labor organizations as possible bias crime victims/survivors has been removed. We assume that is because the statutes we cited previously (ORS 181.550 & 181.642) have been revised or removed; since chapter 181 is now chapter 181A and has been entirely re-numbered, we're not sure. We expressed our solidarity with workers in unions but our concern that the Police Association and its companion organizations might use that provision to claim bias crimes.

CONCLUSION

As always, we would like to see a longer time period given for the review of these policies so that organizations who only meet once a month can draft and vote on feedback. We do appreciate being able to see other comments which have come in, but also would like the Bureau to hint at the possible changes during the First Universal Review so that proposed changes in the second round don't have as many surprises. Finally, while some discussion on Directives is now happening at Portland Committee on Community Engaged Policing subcommittee meetings, it would be good to have notification from the Bureau about any public meetings people can attend to raise questions about the content and process.

Thank you for your consideration

Dan Handelman and other members of
Portland Copwatch