

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	CIVIL NO. 3:12-CV-1652 (AWT)
TOWN OF EAST HAVEN AND THE EAST	)	
HAVEN BOARD OF POLICE	)	
COMMISSIONERS,	)	
	)	
Defendants.	)	
	)	June 28, 2013

**JOINT STATUS REPORT**

The parties to the above-captioned action hereby provide the Court with a joint status report on the implementation of the Agreement for Effective and Constitutional Policing (“Agreement”) entered by the Court on December 21, 2012. In accordance with the provisions of the Agreement, a Joint Compliance Expert (“JCE”) was retained and has been fulfilling the responsibilities required by the Agreement. The JCE is Kathleen O’Toole of O’Toole Associates which is comprised of a team of monitoring specialists.

The JCE submitted a Plan to the parties describing how the JCE would conduct outcome assessments and compliance reviews and audits (§ 192). As part of that Plan the JCE addressed the report schedule set forth in the Agreement. The Agreement requires the JCE to report semi-annually on the progress, or lack of progress, of the East Haven Police Department (“EHPD”) achieving compliance with the requirements and set forth in the Agreement deadlines. The Plan noted that a number of the deadlines for the EHPD are tied

to the mark of 180 days after the effective date of the Agreement. This mark was June 21, 2013. The first semi-annual report by the JCE also was tied to the 180 day mark (¶ 198). In order to allow the first JCE semi-annual report to address and comment upon the compliance reports submitted by the EHPD it was recommended by the JCE and agreed to by all the parties that the first JCE report be re-scheduled for approximately one month later, or about July 22, 2013. Under the new schedule the draft of the JCE report would be circulated among the parties by July 12, 2013 for comment. The parties also agreed on modified dates for the second and third reports of the JCE.

It is the intention of the parties and the JCE to submit a formal motion to the Court to modify the report dates, along with several other modifications which the parties have agreed upon. In the interim, the parties and the JCE wanted to advise the Court that the first JCE report will be filed by July 22, 2013.

In all other respects, the parties and the JCE hereby report that the implementation of the Agreement is going very well. The EHPD has initiated several of the training requirements and has drafted new policies and procedures for ultimate submission to the Board of Police Commissioners. The JCE has met with EHPD, Town officials and community leaders. The JCE has begun the review of training materials and draft policies and has taken steps to initiate a community survey. The parties and the JCE have conducted bi-weekly calls for several months. Details of these events will be set forth in the JCE Report to be filed on or before July 22, 2013.

Respectfully submitted this 28<sup>th</sup> day of June, 2013, 2012.

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**CERTIFICATION**

I hereby certify that on June 28, 2013, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

A copy of the foregoing was mailed to:

Kathleen O'Toole  
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s/John Hughes  
JOHN B. HUGHES  
CHIEF, CIVIL DIVISION