Commission on Statewide Law Enforcement Standards of Conduct and Discipline Codified ORS 243.812

Report to House Committee on Judiciary September 1, 2025

Introduction

The following report is submitted pursuant to ORS 243.812, which directs the Commission on Statewide Law Enforcement Standards of Conduct and Discipline ("LESC Commission") to prepare and submit a report to the House Committee on Judiciary on an annual basis. ORS 243.812(14)(b) requires the report to include "information regarding the progress of each law enforcement agency and civilian or community oversight board, agency or review body, towards implementing and applying the uniform standards and the commission's recommendations on updates to the standards, as are considered necessary."

The LESC Commission and the Uniform Standards

LESC Commission Membership. ORS 243.812(2) specifies the makeup of the Commission membership and directs the Attorney General to appoint the non-legislative members of the Commission. The table below summarizes the current LESC Commission membership.

ORS 243.812(2) Demographic	Members
The Director of the Department of Public Safety Standards and Training or a designee from the department.	Phil Castle
The Attorney General or a designee from the Attorney General's office.	Michael Slauson
Member of the Senate	Senator Floyd Prozanski
Member of the House of Representatives	Representative Jeff Helfrich
Two members who are Chief Law Enforcement Officers	Chief George Burke Sheriff Angela Brandenburg
Two members who represent labor organizations who	Anil Karia
represent law enforcement officers.	Michael Lopez
Two members who represent historically marginalized	Benny Williams
groups or community-based organizations that represent	Tarron Anderson
communities impacted by policing.	
One member who represents a federally recognized Indian tribe or association of tribes within this state.	Chief Jacob McKnight
Two members who are representatives of local government	Steven Schuback
to represent the interests of cities and counties.	Commissioner Dave Henslee
One member who represents public defender organizations established under ORS chapter 151 or the Oregon Criminal Defense Lawyers Association.	Kristen Winemiller
One member who represents the interests of prosecutors in this state.	Kelsie J. Davis McDaniel

Executive Director. The Oregon Legislative Assembly granted the Oregon Department of Justice an Operations and Policy Analyst 4 position to serve as the Executive Director of the LESC Commission. This position is located in the Criminal Justice Division and dedicated to the work of the Commission full time. The Department of Justice issued a nationwide recruitment for the Executive Director position during 2024, and Executive Director Lauri Stewart began work in September 2024.

Adoption of Commission By-Laws

The LESC Commission voted to approve new By-laws in January 2025.

Rule Making

Proposed Rule Amendments. ORS 243.812 requires the Commission to review the rules every two years. In developing the original rules, the initial focus for the Commission was on misconduct that would result in either mandatory or presumptive termination. Accordingly, the Commission began the process of reviewing the existing rules for each of the seven areas of misconduct, and identified the following rules for potential revision:

- 1) OAR 265-010-0015 Unjustified or Excessive Use of Physical or Deadly Force;
- 2) OAR 265-010-0001 Sexual Assault;
- 3) OAR 265-010-0010 Assault; and
- 4) OAR 265-010-0025 Moral Character.

The Commission reviewed all stakeholder feedback and comments received on the current rules and methodically addressed these four areas with a specific eye toward identifying and describing misconduct that would have an applicable presumptive sanction, maximum sanction, and minimum sanction.

The Commission also considered an additional minimum sanction of "Non-Disciplinary Corrective Actions" and its definition.

The review process is still underway as of the date this report was submitted. The Commission made the decision to form subcommittees for each of the 4 rules under consideration to review and discuss in depth, and to develop recommendations for the entire commission to make final decisions on proposed updates in upcoming meetings.

Providing Notice of Uniform Standards

Website: Commission staff replaced the old LESC public-facing website with a significantly expanded <u>LESC Commission</u> website in 2025 and relocated it to a more accessible location. In addition to information about the Commission's public meetings and rulemaking activities, the new site now includes Frequently Asked Questions with resources for Law Enforcement Agencies and officers, those involved in arbitration, and for the general public. The website also

contains all the materials the Commission considered in developing the standards, as well as instructions for public participation in the commission's meetings and rulemaking. The website provides a new, shorter email address (LESC@doj.oregon.gov) to contact the Commission, a subscription button to sign up for notifications, and a comment button for interested stakeholders or members of the public to provide input about the Commission's work at any time.

Outreach and training materials: Commission staff also reviewed and updated all existing outreach materials, including handouts and PowerPoint displays, and began developing new materials for training and outreach.

Narrative Guide: The Commission maintains the <u>Guide to the LESC Rules</u>. The guide is available on the LESC Commission website at <u>LESC - Oregon Department of Justice</u>. The purpose of the guide is to assist stakeholders, including law enforcement officers, law enforcement agencies, disciplining bodies, and the public, in understanding the uniform standards and how they are applied.

Outreach and Informational Presentations.

Chair Michael Slauson and Director Stewart made presentations about the Commission and its work, current rules, applicability, and definitional updates to the following groups:

- Oregon District Attorney Association (ODAA) Elected DA Meeting, December 2024
- Oregon State Sheriff's Association (OSSA) Elected Sheriff Meeting, December 2024
- Oregon Association of Chiefs of Police (OACP) Executive Leadership Conference,
 January 2025
- Tribal Leadership Circle Confederated Tribes of Coos, Lower Umpqua, Siuslaw Indians, March 2025
- State-Tribal Public Safety Cluster (STPSC) Meeting, April 2025
- Oregon Association of Chiefs of Police (OACP) Law Enforcement Leadership Meeting, April 2025

Outreach to cities and counties – Oregon Cities and Counties are considered stakeholders of the LESC Commission, and the statute creating LESC specifies that they shall have two seats on the Commission. Accordingly in August 2025, an informational email was sent to the League of Oregon Cities to increase awareness of the Commission's work and how it may affect officers and agencies they oversee. Similar outreach to the Counties is planned for September.

Outreach to Corrections and Community Corrections (Oregon Association of Community Corrections Directors): Information emails were sent to Corrections and Community Corrections to ensure they were aware of and understand the LESC Rules to which they are now subject.

Outreach through the annual survey: Links to the LESC Rules, the Guide to the LESC Rules, and to additional information on the LESC website, were emailed to district attorneys, police chiefs, sheriffs, Tribal governments, Civilian review and oversight organizations, Corrections and Community Corrections organizations, Oregon County and City associations, as part of our annual survey invitation beginning in late July, 2025.

Progress of Agencies in Implementing and Applying Standards Implementation Database:

Commission staff developed a database to track Agency implementation and application of LESC rules by all Law Enforcement, Corrections and Community Correction Agencies and disciplinary bodies subject to those rules. It tracks steps taken to adopt policy, types of conduct subject to disciplinary action, outcomes of those cases, application of rule in disciplinary cases, sanctions applied, whether any went to arbitration, and if so, how these were resolved. The database contains data collected from law enforcement agencies in 2023 and 2024.

Statewide Implementation Surveys:

Commission staff requested information from law enforcement agencies on their progress in implementing and applying the standards since July 2024. Staff sent an electronic survey to 222 law enforcement, corrections and civilian oversight agencies and district attorneys between July 28 and August 5, 2025, and sent follow up requests on August 15, 2025. Recipients were informed that their responses would become part of this report and be made public. There were 112 responses to the survey, a return rate of over 50% of all agencies surveyed. This was significantly higher than previous annual survey return rates.

The tables below summarize the survey questions and the responses to each question. Survey responses are also attached as Exhibit 1.

Law Enforcement Agency Surveys Section 1: Adoption of the standards

What has your agency done to implement the statewide standards of conduct?	Number of agencies reporting
None of the below: have not yet implemented	9
Reviewed standards and guide	87
Informed or provided info to officers	54

Informed or provided information to all staff that investigate or make findings or disciplinary decisions	56
Adopted policies/included in existing policies	57
Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions	42
Issued directives	24
Provided training to staff making disciplinary decisions	36
Requested training or technical assistance in applying the standards	7
Other	

Why hasn't your agency taken more steps to implement statewide standards of conduct and discipline?	Number of agencies reporting
We didn't need to do anything as we were already compliant.	28
We were awaiting expiration of current CBA	17
We were unaware of the LESC standards	6
We were unsure what was required for implementation	6
Lack of resources	2
None of the above – no obstacles	49
Other – We were unaware those rules applied to us	2

Application in Disciplinary actions

How many individual disciplinary matters or investigations of sworn officers have you concluded or resolved in your agency in the past year?						
None	One	Two - four	Five - nine	10-19	20-49	50+
46	19	21	5	7	2	2

Types of Conduct Reported as Resulting in Disciplinary Investigations

Of 56 responding agencies that reported having had disciplinary cases in the last year, 50 agencies reported having cases that involved types of conduct covered by LESC rules, as compared to 38 agencies who reported disciplinary matters for conduct that is *not* covered by LESC rules.

Of types of conduct that are covered by LESC rules, the most frequently reported single categories of offense that agencies reported as the subject of disciplinary matters are shown in the table below. Most common was Lack of Good Moral Character (reported by 18 agencies), followed by Sexual Harassment (10 agencies), and Unjustified Use of Physical Force (9 agencies)

No responding agencies in the 2025 survey reported disciplinary matters involving Assault or Unjustified Use of Deadly Force.

Of those matters concluded or resolved in the past year, what types of issues or conduct were investigated?	Number of agencies reporting
Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking, Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)	18
Sexual harassment	10
Unjustified or excessive use of physical force	9
Conduct motivated by or based on a real or perceived factor of an individual's race, ethnicity, national origin, sex, gender identity, sexual orientation, religion or homelessness	6
Use of alcohol or drugs while on duty	5
Sexual assault	2
Unjustified or excessive use of deadly force	0
Assault	0
Other issues or types of conduct: Failure to perform duties	38

Other Types of Conduct reported

Of all individual conduct categories reported, the single largest category of conduct types reported that resulted in disciplinary matters, in over two-thirds of responding agencies, was "Other" – meaning types of conduct not currently addressed by LESC rules.

Breaking that large category down further, of the 38 agencies that reported disciplinary matters involving types of conduct not addressed by LESC rules, most conduct described fell into the following general groups:

- Policy or procedure violations,
- Job performance, vehicle use, competence, punctuality,
- Neglect of duty, failure to act or to act properly,
- Integrity, Judgment, Decision making issues
- Attitude or courtesy issues,
- Failure to properly investigate, work performance impacting evidentiary and discovery processes, unlawful search and seizure.
- Miscellaneous

The table below includes the individual responses from different agencies when asked to identify the "other types of conduct" that had been subject of disciplinary matters. Please note that each bullet point below represents a single agency response that may be summarizing anything from a single case to over 100 cases. They are roughly grouped for ease in reading.

This question was asked to gather very rough data to provide a sense of the range of types of conduct not currently covered by LESC rules, that commonly result in discipline across the state. It is hoped this may be helpful data for commissioners in considering priorities for expanding LESC rules.

Please specify "Other types of conduct" (not covered by LESC rules) that were the subject of disciplinary matters in the past year:

- Departmental/internal policy violations (8 agencies gave this description without additional detail)
- Violation of Professional Conduct and Behavior per department policy.
- City owned vehicle policy and report writing policy violations.
- Department Policy Violations: Response to Calls, Initiating an Emergency Response, and Wearing Safety Restraints.
 - Department Policy Violation: Property Handling and Chain of Custody.
- Fail to properly investigate cases, policy violations.
- K9 kenneling policy, Standards of Conduct, Investigations
- Failure to adhere to internal policies or procedures; Misuse of leave or other issues related to leave administration; Failure to obey a supervisor's directives.
- Misrepresentation of the department policy

- Courtesy, vehicle operations, among other minor code of conduct issues.
- 1 Standards of conduct, 2 respectful workplace.
- Other, lower-level employment concerns, such as poor judgement, tardiness, and job performance.
- Competence Performance, Failure to Report to work on time, and Professional Decision Making.
- Performance, work relationships, Unprofessional Conduct, Driving, Insubordination, Attendance.
- Work performance, vehicle crash involving officer, and off duty complaint involving officer attitude and behavior.
- Work performance impacting evidentiary and discovery processes.
- Integrity and honesty. Courtesy and treatment of co-workers.
- Standards of Conduct, use of system resources, supervisor accountability, driving on county business, time reporting.
- Harassment, Discourtesy, Conduct Unbecoming, Unlawful Search/Seizure
- Rudeness, favoritism, police not doing their jobs, yelling loudly and pointing firearm at
 possible suspect, mad about getting pulled over, complaint of "misconduct" with no
 follow through from reporting party or descriptions of what had happened, turning in
 police reports late, missed grand jury, illegal stops as it happened on private property
 and illegal parking during traffic same stop.
- Neglect of Duty
- Failure to perform duties
- Failure to perform requirements of job.
- Failure to perform duties, complete investigations and reporting. Decision making.
- Failure to meet assigned Adult on Supervision (AOS) contact standards, required
 documentation of contacts and lack of AOS accountability (lack of imposed
 sanctions/interventions to known condition violations). Violated policy with regard by
 allowing a high-risk AOS on supervision for murder to live outside of Yamhill County
 without submission of a transfer agreement for several months and overall lack of AOS
 oversight/supervision.
- Failed training requirements at academy and FTEP
- Unwanted touching
- Theft
- Unconstitutional Stop (Unfounded), Bias/Unconstitutional Arrest (Unfounded).

Were the Statewide Standards of Conduct and Discipline (OAR 265) applied in any of the matters concluded or resolved in the past year?

Did your agency apply the Statewide Standards of Conduct and Discipline (OAR 265) in any of the matters concluded or resolved in the past year?	Number of agencies reporting
Yes, in one or more cases	21
No, standards were not applicable.	28
 No, other reasons: At the time Parole and Probation didn't apply to statute The officer failed training Not applicable for the investigation. The officer was not technically reporting for or on duty at the time. He was attending the academy and consumed alcohol in the evening before driving the police car back to the academy. Unaware of statewide standards. We used the state standard and added it to include additional policy violations to create equity and to be transparent. 	7

Did any matter(s) in which you applied the statewide standards of conduct and discipline result in sustained findings?	Number of agencies reporting
Yes (in all allegations)	6
Yes (in at least one allegation)	12
No, the officer left the agency before investigation was completed.	4
No, other result:	4
 N/A, we used policy and procedures to terminate the officer. Not OAR. 	
The case is pending arbitration.No further explanation provided (2 agencies)	

Did any sustained findings in the matter(s) above result in discipline? (Discipline is defined as termination, economic sanctions such as demotion or suspension, or written reprimand)	Number of agencies reporting
Yes, in all cases	14
Yes, in some cases	6
No, officer left agency before discipline was determined or imposed.	2
No sustained matters resulted in discipline	1

What level of sanction did your agency impose?	Number of agencies reporting
The Mandatory Sanction	10
The Presumptive Sanction	4
Mitigated Sanction	4
Aggravated Sanction	1
 Other: Again, we used policy and procedures to terminate the employee. I don't impose sanctions as to a person's job, but I prosecuted one officer. N/A. Officer Left employment 	3

Arbitration

Did your agency conclude arbitrations for any disciplinary matters in the last year?		
Yes	No	
6	65	

What were the results of arbitration?	Number of agencies reporting
Arbitrator upheld agency finding(s) and disciplinary action(s)	0
Arbitrator found the agency did not meet burden of proof for one or more findings, or found one or more disciplinary actions arbitrary and capricious or not in accordance with LESC rules, and referred case(s) back to the disciplining body.	1
Arbitrator did not uphold the agency finding and/or disciplinary action, and did not refer any part of the case back to the agency/disciplining body.	2
 Other outcome or additional information: Matter is pending arbitration Still waiting for outcome Arbitrator did not uphold the agency finding and ordered rehiring of the deputy. Arbitrator upheld findings of sustained, reduced termination to 30 days off. LESC rules not in place due to CBA. 	3

Agency Comments and Recommendations

The survey also invited law enforcement to provide feedback or suggestions for updates to the standards of conduct and the standards of discipline.

Do you have any additional comments regarding your agency's application of the standards? (I.e., disciplinary investigations, findings, disciplinary actions, use of mitigating/aggravating factors, or arbitration?)

None - guide is helpful and informative.

No, we will work on adding verbiage to become compliant.

The standards and matrix seem to have played a role in at least one instance where an employee resigned prior to termination.

I am unsure if this applies to Railroad Police Departments/Officers. I would like clarification.

I am unsure of whether we have fully updated all of our policies based on the rules and guidance.

It is important to note, that although we investigated some allegations that if sustained they would fall within the OAR 265 guideline, none were sustained where this applied.

Just started reviewing and updating our Personnel Complaints policy, will review the LESC Rules as part of this process.

No obstacles, current cba was in place at time of issuance of these expanded rules for Community Corrections. We have reviewed them and will be incorporating them into our upcoming bargaining and future CBA.

At the start of an investigation we may think falls under these standards, we refer to the printed discipline standards and conduct booklet which includes mitigating and aggravating factors and discipline recommendations.

One matter is taking a significant period of time to resolve and will be included in the next report that involves LESC issues.

Please note, that the responses to your survey are for the Independent Police Auditor's Office alone. As we are separate from Eugene Police Department these answers do not reflect their information or responses.

The Office of Community-based Police Accountability is not yet operational. The Board that governs the work was appointed by our City Council on June 18, 2025, and is still in the process of background checks. Once the Board pass those checks, they will be involved in hiring the office's director. The director will then hire staff, including investigators. We are making progress, but it will be a while before we can take on cases and be fully operational.

This agency does not employ an investigator.

We are reviewing what we need to add for language to our sworn CBA and if any policy changes need to occur. HR is reviewing.

We currently have a robust disciplinary process which we follow. We will begin applying the standards in our next CBA cycle set to begin in July of 2027.

We just updated a few policies and procedures to be compliant.

We no longer employ an investigator or other sworn officer. There is no question to mark that this may not apply to our agency.

We still need to build our knowledge base on the LESC Rues. The PD had a few years of low staffing that has affected its ability to take a bigger picture look at these areas.

Do you have any recommendations for the Commission? (i.e., regarding possible improvements, changes or additions to the uniform standards of Conduct and Discipline, how to make the standards or guide easier to use, or how to better support your agency in implementing the standards?)

An updated internal discipline and investigations class put on by the LESC and ODOJ would be helpful.

Arbitrators still have the ability to circumvent the intent of the standards by finding the agency did not meet the burden of proof, which is very subjective.

Some categories could be expanded upon - for example, unjustified force which does not result in injury should still be viewed as a significant act, and could be addressed in LESC rules/via discipline matrix.

Lack of good moral character should be reviewed and split into a few separate classifications. Untruthfulness, for example, may have mitigating factors that could be applied. We apply the sanction as it is written, and it can be draconian.

Have a simple form to fill out for agencies like mine that don't employ law enforcement investigators.

In general, there is a lack of transparency mechanisms for how and if these new standards are applied, particularly in jurisdictions with no independent civilian oversight.

Maybe a quick reference guide or suggestions on how to gain compliance in CBAs and policies. Spread Awareness of these requirements? I am in a rural small agency and don't have the same resources as larger agencies that have advisory staff on new laws and policy requirements.

Question 13 states to select all that apply, however only 1 option can be selected.

I am not sure why we're reporting on other types of conduct, that single question is what took me the longest to research and report on as our system automatically flags LESC issues but does not compound all the other issues.

The one unjustified use of force investigation was prior to the current CBA renewal and did not result in serious injury.

(For DPSST) - try to review certification suspensions and revocations in a more timely manner

We developed a Matrix with our bargaining unit and it is used to determine the appropriate level of discipline when it is necessary.

Is there anything else we haven't already asked that you would like to address?

We refused to abide by the arbitrators' decision as we believe it to be unlawful

Overall, we prefer the standards. Initially, we were concerned about losing discretion, but they do provide clarity and consistency for employees and for management.

Integrity and honesty are areas that are missing from this survey. Many agencies hold people accountable for those things while most of what is mentioned above is rarely sustained.

Nothing at this time, looking forward to working with you to implement these rules.

Current Sheriff's Office P&P covers all divisions within the Office. The current P&P manual is Lexipol with updates completed on a regular basis. As a requirement, all new updates are sent to Staff and must be acknowledged. The acknowledgements and policy updates are tracked in the system

Current Sheriff's Office P&P covers all divisions within the Office. The current P&P manual is Lexipol with updates completed on a regular basis. As a requirement, all new updates are sent to Staff and must be acknowledged. The acknowledgements and policy updates are tracked in the system

Please note, while we independently monitor investigations and make adjudication recommendations for misconduct we are not involved in the final adjudication or disciplinary decisions. The abovementioned actions in this survey list apply more to the Eugene Police Department, but not our office. What we do offer in terms of these standards is transparency into the outcomes of these investigations and knowledge of whether or not the statewide standards were applied based on sustained allegations. Our office also has the sole authority to classify complaints and write specific allegations of misconduct. This provides an independent safeguard against the department not leveling allegations related to the new standards.

Union signed new CBA which was took effect July 1. Union has been notified.

All agency responses to those questions are included in Exhibit 1.

Public Comments and Reccomendations

Members of the Public. Commission staff sent an electronic survey to members of the public and organizations that participated in the rulemaking process. Twenty-four individuals and organizations received the survey. This survey asked for public comments and general feedback for the LESC Commission. Recipients were informed that their responses would become part of this report and be made public. This year only three public responses were received. Two of the three contained specific recommendations that will be shared with commissioners.

The Public feedback we received is summarized below and attached as Exhibit 2.

Public Survey Responses - Summaries

Alicia LeDuc Montgomery, LeDuc Montgomery LLC:

A document was attached that recommends adding two commission seats for Civil Rights Representation to the LESC, one for a civil rights attorney with litigation experience representing victims of law enforcement misconduct, the other for an advocacy organization focused on constitutional and civil rights. It also suggests mandating transparent reporting and victim notification to strengthen public trust in the system.

Barbara Kenny, Pacific Northwest Family Circle:

A document was attached that recommends adding two members, one who has been directly impacted by police violence or misconduct, and one with experience with civilian oversight of law enforcement, positions that would replace one chief law enforcement officer seat and one police labor organization seat.

Jessica Renfro:

The third response addressed concerns over the response of various police officers to a personal situation, issues that fall outside the scope of the functions of the LESC Commission.

Future Priorities and Conclusion

We will continue the review of existing LESC rules that is currently underway. Once completed, we will begin consideration of priorities for development of new rules. We also intend to expand outreach, training and stakeholder engagement in the coming year to increase awareness and understanding of LESC Rules, and to provide guidance and resources on their correct application by all Law Enforcement groups now subject to LESC Rules. Finally, a priority in the coming year will be making our Implementation Tracking system available online as an interactive tool.

			4 Obotool t-	5. Any disciplinary		6. Types of issues or		9 Custoir -	O Were L FOO	10. Did disciplinary		14.Any	45 Decula	16. Additional	17.	18. What we haven't asked an
1. Your name	2. Agency	3. Agency steps to adopt LESC rule?	4.Obstacles to adopting?	matters in last year?	5a. How many?	conduct investigated?	7. Please specify other types	8. Sustained findings?	9.Were LESC standards applied?	matters result in discipline?	sanction did your agency impose?	matters arbitrated?	15. Results of arbitration	regarding to standard?	Recommendations for the Commission?	
John Schmerber	Gladstone Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions	We didn't need to do anything as we were alread compliant.	One or more	1	Other issues or types of conduct	Failure to perform duties	No, standards were not applicable				No		None	None	No
Ronald C. Bridge	Umatilla Police Department	Reviewed standards and quide t Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and guide	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	One officer terminate for consuming alcoho and driving a police vehicle.			No, other reason: The officer was not technically reporting for or on duty at the time. He was attending the academy and consume alcohol in the evening before driving the police calback to the academy.	d	Yes, in all cases s t	Other: Again, we used policy and procedures to terminate the employee.	No		No	No	No
Isaiah Haines	Monmouth Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and quide	We were awaiting expiratio of then-current CBA	n None								No				
Jim Hamilton	Eagle Point Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and quide	None of the above	One or more disciplinary matters or investigations	4	Other issues or types of conduct	Fail to properly investigate cases, policy violations.	No, other reason: Not applicable for the investigation.	No, other result: N/A	Yes, in some cases	The Presumptive sanction	No		None applied	No	
John Gautney	Crook County Sheriff's Office	Adopted policies/included in existing policies Reviewed standards and guide	We were awaiting expiratio of then-current CBA	n One or more disciplinary matters or investigations	2	Other issues or types of conduct	Violation of agency policy and performance	No, standards were not applicable				No				
Derek Bowker	Phoenix Police Department	t Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and quide	None of the above	None								No				
Rob Schulz	Cannon Beach Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Reviewed standards and guide	We didn't need to do anything as we were alread compliant.	One or more ly disciplinary matters or investigations	Handled 3 disciplinar matters	Other issues or types of conduct	Work performance, vehicle crash involving officer, and off duty complaint involving officer attitude and behavio		Yes (in at least one allegation)	Yes, in all cases	A mitigated sanction	No				
Juventino Banuelos	Independence Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and quide	None of the above	One or more disciplinary matters or investigations	11	Other issues or types of conduct Unjustified or excessive us of physical force	Internal policy violations.	No, standards were not applicable				No		No	The one unjustified use of force investigation was prior to the current CBA renewal and did not result in serious injury.	No
Anthony Burke	Salem Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Other: Implemented into CBA Provided training to staff making disciplinary decisions	None of the above	One or more disciplinary matters or investigations	5	Other issues or types of conduct	K9 kenneling policy, Standards of Conduct, Investigations	No, standards were not applicable				No				
Jeremiah Holmes	Wheeler County Sheriff's Office	Reviewed standards and guide None of the above: have not yet implemented	We were unaware of the LESC standards	None								No				
Andron Shadrin	Woodburn Police Department	Adopted policies/included in existing policies None of the above: have not yet implemented	None of the above	One or more disciplinary matters or investigations	3	Conduct motivated by or based on a real or perceived factor of an individual's race, ethnicity, national origin, sex, gender identity, sexual orientation, religion or homelessness Other issues or types of conduct		No, standards were not applicable				No				
Gary Bell	La Grande Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	1	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	Yes (in all allegations)	Yes, in all cases	The Mandatory sanction	No				
Samuel Craven	Sandy Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	1	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	Yes (in all allegations)	Yes, in all cases	The Mandatory sanction	No				

			4.Obstacles to	5. Any disciplinary matters in last		6. Types of issues or conduct	7. Please specify	8. Sustained	9.Were LESC	10. Did disciplinary matters result in	sanction did your	14.Any matters		16. Additional regarding to	17. Recommendations	
1. Your name		3. Agency steps to adopt LESC rule?	adopting?	year?	5a. How many?	investigated?	other types	findings?	standards applied?	discipline?	agency impose?	arbitrated?	of arbitration	standard?	for the Commission?	address?
Chief Greg Graven	Yamhill Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Requested training or technical assistance in applying the standards Reviewed standards and guide	None of the above	None								No				
Gregg Griffith John Pitcher	Rainier Police Department Florence Police Dept	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Reviewed standards and quide Informed or provided information to all staff that investigate or make	We didn't need to do anything as we were alread compliant. None of the above	None y								No				
John Pitcher	Plotence Police Dept	Informed of provided mormation to air stan that investigate of make findings or disciplinary decisions Reviewed standards and guide	None of the above	None								INO				
James Moore	The Klamath Tribes Department of Public Safety	Other: We are currently still building our agency. We are a newly established department and have began hiring and training staff. As we progress we will be implementing these initiatives.		None								No				
Cord Wood	McMinnville Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Reviewed standards and quide	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	4	Sexual harassment		No, standards were not applicable				No				
Travis Johnson	Malheur County Sheriff' Office	Adopted policies/included in existing policies Reviewed standards and guide	None of the above	None								No				
Peter Mahuna	West Linn Police Department	Informed or provided info to officers Reviewed standards and guide	We didn't need to do anything as we were alread compliant.	None y								No		No	NO	NO
Michael Pace	Toledo Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were alread compliant.	None y								No				
Jerry Drum	Albany Police Department	Adopted policies/included in existing policies Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and guide	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	4	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking, Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority) Other issues or types of conduct	Department Policy Violations: Response to Calls, Initiating an Emergency Response, and Wearing Safety Restraints. Department Policy Violation Property Handling and Chain of Custody.	Yes, in one or more cases	Yes (in all allegations)	Yes, in all cases	The Mandatory sanction	No		None	None	None
Chris Owen	Clackamas County District Attorney	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Reviewed standards and quide	We were recently made aware that the disciplinary matrix applies to DA investigators. We have implemented this and made it a part of our policy for investigators.	None								No				
Matt Kelly	Tillamook County Sheriff's Office	Adopted policies/included in existing policies Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Reviewed standards and quide	We were unsure what was required for implementation		2	Other issues or types of conduct Sexual harassment	unwanted touching	No, standards were not applicable				No		no	no	no
Kara K. Davis	Wasco County District Attorney	Adopted policies/included in existing policies Informed or provided information to all staff that investigate or make findings or disciplinary decisions	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	2	Other issues or types of conduct Sexual harassment	Theft	Yes, in one or more cases	Yes (in at least one allegation)	No, officer left agency before discipline was determined or imposed.	Other: I don't impose sanctions as to a person's job, but I prosecuted one	No				
William Caldera	Pilot Rock PD	Reviewed standards and quide Informed or provided info to officers	We didn't need to do anything as we were alread	None y							officer.	No				
Tanner Wark	Deschutes County Adult Parole and Probation	Informed or provided info to officers Reviewed standards and guide	compliant. None of the above	None								No	+	Not at this time.	Not at this time.	Not at this time.
Jay Bergmann	Parole and Probation Marion County Sheriff's Office	Netwiewed standards and guide Adopted policies/included in existing policies Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and guide	None of the above. We just updated a few policies and procedures to be compliant	disciplinary matters or	14	Other issues or types of conduct Sexual assault Sexual harassment Unjustified or excessive use of physical force	of system resources, supervisor accountability, driving on county business,	Yes, in one or more cases	Yes (in at least one allegation)	Yes, in some cases	The Presumptive sanction	Yes	Other outcome: Arbitrator did not uphold the agency finding and ordered rehiring of the deputy.	We just updated a few policies and procedures to be compliant.	Arbitrators still have the ability to circumvent the intent of the standards by finding the agency did not meet the burdon of proof, which is very subjective.	

1. Your name	2. Agency	3. Agency steps to adopt LESC rule?	4.Obstacles to adopting?	5. Any disciplinary matters in last year?	5a. How many?	6. Types of issues or conduct investigated?	7. Please specify other types	8. Sustained findings?	9.Were LESC standards applied?	10. Did disciplinary matters result in discipline?	11. What level of sanction did your agency impose?	14.Any matters arbitrated?	15. Results	regarding to	17. Recommendations for the Commission?	
Kyle Potter	Springfield Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Requested training or technical assistance in applying the standards Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	About 110	Conduct motivated by or based on a real or perceived factor of an individual's race, ethnicity, national origin, sex, gender identity, sexual orientation, religion or homelessness. Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority) Other issues or types of conduct Sexual assault Sexual harassment Unjustified or excessive us of physical force	Courtesy, vehicle operations, among other minor code of conduct issues.	No, standards were not applicable		usepinie:	agency impose:	No No		Standard 1	None	No.
Steve Macartney	Burns Police Department	Informed or provided info to officers	None of the above	None								No	1	N/A	N/A	N/A
Scott F Williams	Wasco County Sheriffs Office	Reviewed standards and guide Adopted policies/included in existing policies Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Requested training or technical assistance in applying the standards Reviewed standards and guide	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	One through arbitration	Conduct motivated by or based on a real or perceived factor of an individual's race, ethnicity, national origin, sex, gender identity, sexual orientation, religion or homelessness Sexual harassment		No, other reason: At the time Parole and Probation didn't apply to statute	No, other result: Didn't app see 10a	ly Yes, in all cases	A mitigated sanction	Yes	Arbitrator did not uphold the agency finding and/or disciplinary action, and did not refer any part of the case back to the agency/disciplini no body.			We refused to abide by arbitrators' decision as we believe it to be unlawful
Ryan Eaton	Corvallis Police Departmen	t Reviewed standards and guide	We were awaiting expiration of then-current CBA	One or more disciplinary matters or investigations	2	Conduct motivated by or based on a real or perceived factor of an individual's race, ethnicity, national origin, sex, gender identity, sexual orientation, religion or homelessness Other issues or types of conduct	Unconstitutional Stop (Unfounded), Bias/Unconstitutional Arres (Unfounded).	No, standards were not applicable t				No	no nony	We currently have a robust disciplinary process which we follow. We will begin applying the standards in our next CBA cycle set to begin in July of 2027.		
Lindsey Foltz	City of Eugene Independen Police Auditor's Office	It Other: Please note, while we independently monitor investigations and make adjudication recommendations for misconduct we are not involved in the final adjudication or disciplinary decisions. The above mentioned actions in this survey list apply more to the Eugene Police Department, but not our office. What we do offer in terms of these standards is transparency into the outcomes of these investigations and knowledge of whether or not the statewide standards were applied based on sustained allegations. Our office also has the sole authority to classify complaints and write specific allegations of misconduct. This provides an independent safeguard against the department not leveling allegations related to the new standards. Reviewed standards and guide		None								No		Please note, that the responses to your survey are for the Independent Police Auditor's Office alone. As we are separate from Eugene Police Department these answers do not reflect their information or responses.	In general, there is a lack of transparency mechanisms for how and it these new standards are applied, particularly in jurisdictions with no independent civilian oversight.	independently monitor
Josh Wolf	Grant County Community Corrections	None of the above: have not yet implemented Reviewed standards and guide	We were unaware of the LESC standards We were unsure what was required for implementation									No		No, we will work on adding verbiage to become compliant.	Maybe a quick reference guide or suggestions on how to gain compliance in CBAs and policies. Spread Awareness of these requirements? I am in a rural small agency and don't have the same resources as larger agencies that have advisory staff on new laws and policy requirements.	looking forward to working with you to
Jesse Olsen	Lane County Sheriff's Office	e Informed or provided information to all staff that investigate or make findings or disciplinary decisions Other: Prepared draft policy revision for when next CBA is signed and LESC rules go into effect. Reviewed standards and guide	We were awaiting expiration of then-current CBA	One or more disciplinary matters or investigations	9	Other issues or types of conduct Sexual harassment	Other, lower-level employment concerns, suc as poor judgement, tardiness, and job performance.	No, standards were not h applicable				No			Some categories could be expanded upon - for example, unjustified force which does not result in injury should still be viewer as a significant act, and could be addressed in LESC rules/via discipline matrix.	

4. W			4.Obstacles to	5. Any disciplinary matters in last		6. Types of issues or conduct	7. Please specify	8. Sustained	9.Were LESC	10. Did disciplinary matters result in	sanction did your	14.Any matters		regarding to		
1. Your name Michael R. Crim	2. Agency Coos County Community	3. Agency steps to adopt LESC rule? Informed or provided info to officers	adopting? None of the above	year?	5a. How many?	investigated?	other types	findings?	standards applied?	discipline?	agency impose?	arbitrated?	of arbitration	standard?	for the Commission?	address?
mondor r. Omn	Corrections	Issued directives Reviewed standards and guide	The second of the above	T. G. I. G.												
Travis Ash	Baker County	Reviewed standards and guide Reviewed standards and guide	None of the above	One or more disciplinary matters or	3	Other issues or types of conduct	policy violations	No, standards were not applicable				No				
Leff IZ - and ald	Newton Bonder Beller	Advantad a Nicha finahad dia ani Nicha a Nicha	Mr. didelt a d.t. d.	investigations		conduct		арріісавіе				NI-				
Jeff Kosmicki	Newberg-Dundee Police Department	Adopted policies/included in existing policies	We didn't need to do anything as we were already	None								NO		no	no	no
Brian Prevett	oregon Department of	Adopted policies/included in existing policies	None of the above: No	None								No		No	A updated internal	
	Justice - Criminal Justice Division	Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions	obstacles were encountered in implementing the	i											discipline and investigations class put on	
		Informed or provided information to all staff that investigate or make findings or disciplinary decisions	standards.												by the LESC and ODOJ would be helpful.	
Jarrod Prater	Tigard Police Department	Reviewed standards and quide Adopted policies/included in existing policies	We didn't need to do	One or more	16	Conduct motivated by or	Harassment, Discourtesy,	Yes, in one or more cases	Yes (in at least one	Yes, in all cases	The Mandatory sanction	No		No	No	No
		Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions	anything as we were already compliant.			based on a real or perceived factor of an	Conduct Unbecoming, Unlawful Search/Seizure	,	allegation)		,					
		Informed or provided info to officers	compilant.	investigations		individual's race, ethnicity,	Official occition occition									
		Informed or provided information to all staff that investigate or make findings or disciplinary decisions				national origin, sex, gender identity, sexual orientation,										
		Issued directives Provided training to staff making disciplinary decisions				religion or homelessness Lack of Good Moral										
		Requested training or technical assistance in applying the standards Reviewed standards and guide				character (conduct constituting a state or										
						federal felony, DV, stalking Drug-related offense, bias	,									
						or hate crime, sex crime, untruthfulness, misuse of										
						authority)										
						Other issues or types of conduct										
						Use of alcohol or drugs while on duty										
Greg Baxter	Baker County District Attorney's Office	Reviewed standards and guide	We didn't need to do anything as we were already compliant.	None								No				
Tira L Hubbard	Multnomah County Community Justice Adult	Informed or provided information to all staff that investigate or make findings or disciplinary decisions	We were unsure what was required for implementation		3	Other issues or types of conduct	1 Standards of conduct, 2 respectful workplace.	No, standards were not applicable				No				
Peter Simpson	Services Division Multnomah County District	Reviewed standards and guide Reviewed standards and guide	We were unaware of the	investigations One or more	1	Other issues or types of		No, other reason:Unaware								
	Attorney's Office	g	LESC standards	disciplinary matters or investigations		conduct		of statewide standards.								
Vince Hoffarth	Union Pacific Railroad	None of the above: have not yet implemented	None of the above	None								No		I am unsure if this	None	None
	Police													applies to Railroad Police		
														Departments/Officers. I would like		
Kyle Pfeifer	Sherman County Sheriff's	Informed or provided info to officers	We didn't need to do	None	 					+		No		clarification.		
	Office	Issued directives Reviewed standards and guide	anything as we were already compliant.	y												
Jamie Carrico	The Dalles Police Department	Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions	None of the above	One or more disciplinary matters or	Only one fitting the requirements of the	Lack of Good Moral character (conduct	Rudeness, favoritism, polic not doing their jobs, yelling	e Yes, in one or more cases	Yes (in all allegations)	No, officer left agency before discipline was	Other: N/A. Officer Left employment	No		At the start of an investigation we may		Union signed new CBA which was took affect
	Бораганон	Informed or provided info to officers Informed or provided information to all staff that investigate or make		investigations	Commission on Statewide Law	constituting a state or federal felony, DV, stalking	loudly and pointing firearm			determined or imposed.	op.oyo			think falls under these standards, we refer to		July 1. Union has been notified.
		findings or disciplinary decisions			Enforcement	Drug-related offense, bias	about getting pulled over,							the the printed		nouned.
		Reviewed standards and guide				or hate crime, sex crime, untruthfulness, misuse of	complaint of "misconduct" with no follow through from							discipline standards and conduct booklet		
					010-0025 Moral Character.	authority) Other issues or types of	reporting party or descriptions of what had							which includes mitigating and		
					Approx 10 total.	conduct	happened, turning in police reports late, missed grand							aggravating factors and discipline		
							jury, illegal stops as it happened on private							recommendations.		
							property and illegal parking									
							during traffic same stop.									
Keith Leitz	City of Redmond	Adopted policies/included in existing policies	None of the above	One or more	Approximately 6	Lack of Good Moral		Yes, in one or more cases		Yes, in all cases	The Mandatory sanction	No			Lack of good moral	Overall, we prefer the
		Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions		disciplinary matters or investigations		character (conduct constituting a state or			allegation)						character should be reviewed and split into a	standards. Initially, we were concerned about
		Informed or provided info to officers Informed or provided information to all staff that investigate or make				federal felony, DV, stalking Drug-related offense, bias	,								few separate classifications.	losing discretion, but the do provide clarity and
		findings or disciplinary decisions Provided training to staff making disciplinary decisions				or hate crime, sex crime, untruthfulness, misuse of									Untruthfulness, for example may have	consistency for employees and for
		Reviewed standards and guide				authority) Unjustified or excessive us									mitigating factors that could be applied. We apply the	management.
						of physical force	9								sanction as it is written,	
Scott Robinson	Myrtle Point Police	Adopted policies/included in existing policies	We didn't need to do	One or more	One	Other issues or times of	Violation of Professional	No, standards were not		<u> </u>		No			and it can be draconian.	
COURT NODITISUIT	Department	Informed or provided information to all staff that investigate or make	anything as we were already	disciplinary matters or	One	Other issues or types of conduct	Conduct and Behavior per					140				
		findings or disciplinary decisions Reviewed standards and quide	compliant.	investigations			department policy.									
John Schmerber	Gladstone Police Department	Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions	None of the above	One or more disciplinary matters or	 The issue ended in a resignation. 	Other issues or types of conduct	failure to perform duties, complete investigations and			1		No		None	None	No
		Informed or provided info to officers Informed or provided information to all staff that investigate or make		investigations	1	1	reporting. Decision making			1						
		findings or disciplinary decisions				1				1						
Frank Ct	Laborer Baller B	Provided training to staff making disciplinary decisions Reviewed standards and quide	Name of the sales	Nana	ļ	ļ				1		Ne				
Frank Stevenson	Lebanon Police Departmen	Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions	None of the above	None		1				1		INO				
		Informed or provided information to all staff that investigate or make findings or disciplinary decisions				1				1						
		Issued directives Reviewed standards and guide														
Ron Brown	Clatsop County DA Office		None of the above	None				1				No	1	1	1	

			4.Obstacles to	5. Any disciplinary matters in last		6. Types of issues or conduct	7. Please specify	8. Sustained	9.Were LESC		sanction did your	14.Any matters		regarding to	17. Recommendations	
1. Your name David Gurski	2. Agency Philomath Police	Agency steps to adopt LESC rule? Provided training to staff making disciplinary decisions	adopting? None of the above	year? None	5a. How many?	investigated?	other types	findings?	standards applied?	discipline?	agency impose?	arbitrated?	of arbitration	standard?	for the Commission?	address?
	Department	Reviewed standards and guide										NO				
Nick Troxel	Tillamook Police Department	None of the above: have not yet implemented	We were unaware of the LESC standards	None								No				
Paul J Charas	Lake County District Attorney's Office	Informed or provided info to officers	None of the above	None								No				
Rob Dentinger	Klamath Falls Police	Adopted procedures or integrated in existing procedures to routinely		None								No				11547 Kestrel Road
Kristen Thorp	Department City of Portland - Office of	review standards prior to making disciplinary decisions None of the above: have not yet implemented	Lack of resources. The	None								No		The Office of	n/a	n/a
	Community-based Police Accountability		Office of Community-based Police Accountability is not yet operational. The Board that governs the work was appointed by our City Council on June 18, 2025, and is still in the process of background checks. Once the Board pass those checks, they will be involve in hiring the office's director The director will then hire staff, including investigators We are making progress, but it will be a while before we can take on cases and be fully operational.	-										Community-based Police Accountability is not yet operational. The Board that governs the work was appointed by our City Council on June 18, 2025, and is still in the process of background checks. Once the Board pass those checks, they will be involved in hiring the office's director. The director will then hire staff, including investigators. We are making progress, but it will be a while before we can take on cases		
Byron D. Smith	City of Hermiston	Requested training or technical assistance in applying the standards Reviewed standards and guide	We were awaiting expiration of then-current CBA	n None								No		and be fully operational.		
Gregg Griffith	Rainier Police Department	S .	We didn't need to do anything as we were alread	None								No				+
Todd Rich	Black Butte Ranch Police	Reviewed standards and guide	compliant. We were unaware of the LESC standards	None								No		Just started reviewing and updating our Personnel Complaints policy, will review the LESC Rules as part of this process.		
Michael Pace	Toledo Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were alread compliant.	None y								No				
Larry Evenson	Columbia County Community Justice	Reviewed standards and guide	None of the above. We are reviewing what we need to add for language to our sworn CBA and if any polic changes need to occur. He is reviewing.	disciplinary matters or investigations	one	Other issues or types of conduct	policy violation	No, standards were not applicable				No		We are reviewing what we need to add for language to our sworn CBA and if any policy changes need to occur. HR is reviewing.		
Dan Jenkins	Harney County Sheriff's Office	Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	3	Other issues or types of conduct	Failure to perform requirements of job.	Yes, in one or more cases	Yes (in all allegations)	Yes, in some cases	The Mandatory sanction	No		reviewing.		
Erik Harth	Manzanita Police Department	Informed carning of scan making disciplinary according to the findings or disciplinary decisions reviewed standards and guide	We were unsure what was required for implementation	None								No				
David Denney	Curry County	Adopted policies/included in existing policies Informed or provided info to officers Reviewed standards and guide	None of the above: Current Sheriff's Office P&P covers all divisions within the Office. The current P&P manual is Lexipol with updates completed on a regular basis. As a requirement, all new updates are sent to Staff and must be acknowledged. The acknowledgements an policy updates are tracked in the system									No		Answers provided in the survey only pertain to Community Corrections staff.	none at this time.	Current Sheriff's Office R&P covers all division within the Office. The current P&P manual is Lexipol with updates completed on a regular basis. As a requireme all new updates are set to Staff and must be acknowledgements ar policy updates are tracked in the system
Scott Logue	Central Point Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were alread compliant.	None y								No				
Jason Edmiston	Hermiston Police Department	Adopted policies/included in existing policies Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Reviewed standards and quide	None of the above	One or more disciplinary matters or investigations	2	Other issues or types of conduct	Neglect of Duty	No, standards were not applicable				No		No.	None.	No.
Andrew Copeland	Keizer Police Department	Reviewed standards and quide Adopted policies/included in existing policies Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Requested training or technical assistance in applying the standards Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	3	Other issues or types of conduct Use of alcohol or drugs while on duty	Competence Performance, Failure to Report to work or time, and Professional Decision Making.	Yes, in one or more cases	Yes (in at least one allegation)	Yes, in some cases	A mitigated sanction	No				

																18. What we
			4.Obstacles to	5. Any disciplinary matters in last	1	Types of issues or conduct	7. Please specify	8. Sustained	9.Were LESC	10. Did disciplinary matters result in	11. What level of sanction did your	14.Any matters	15. Results	16. Additional regarding to	17. Recommendations	haven't asked and would like
1. Your name Ryan Doyle		Agency steps to adopt LESC rule? None of the above: have not yet implemented	adopting? Lack of resources	year? One or more	5a. How many? One (1)	investigated? Lack of Good Moral	other types	findings? No, standards were not	standards applied?	discipline?	agency impose?	arbitrated?	of arbitration Arbitrator found	standard?	for the Commission?	address?
Ryan Doyle	Coquille Police Department	ivone of the above, have not yet implemented	We were awaiting expiration of then-current CBA We were unsure what was required for implementation		One (1)	character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		no, standards were not applicable				res	the agency did not meet burden of proof for one or more findings, or found one or more disciplinary actions arbitrary and capricious or not in accordance with LESC rules, and referred case(s)			
Larry Larson	Coburg Police Department	Other:Updated Lexipol policies with all current updates and gave out to		One or more	One	Other issues or types of	Failed training requirement	s No, other reason: Failed	No, other result. Left agen			No	back to the disciplining body.	No		
		all the officers. Reviewed standards and guide	required for implementation	disciplinary matters or investigations		conduct	at academy and FTEP	training		resulted in discipline						
Anthony Cereghino	Milwaukie Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Requested training or technical assistance in applying the standards Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	3	Other issues or types of conduct Unjustified or excessive use of physical force	Policy ViolationsCity owned vehicle policy and e report writing policy violations.	No, other reason: We used the state standard and added it to include addition policy violations to create equity and to be transparent.	before investigation was			No		No	No	No
Mike Krantz	Bend Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and guide	We were awaiting expiration of then-current CBA	One or more disciplinary matters or investigations	6	Other issues or types of conduct Sexual assault	Conduct of department policy violations	No, standards were not applicable				Yes	Other outcome: Arbitrator upheld findings of sustained, reduced termination to 30 days off. LESC rules not in place due to CBA.			
Michelle Duncan	Linn County Sheriff's Office	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and guide	We didn't need to do anything as we were alread compliant.	One or more disciplinary matters or investigations	1	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	Yes (in at least one allegation)	Yes, in some cases	The Presumptive sanction	No				
Sam Elliott	Yamhill County Sheriff's Office	Adopted policies/included in existing policies Provided training to staff making disciplinary decisions Reviewed standards and guide	We were awaiting expiration of then-current CBA	One or more disciplinary matters or investigations	14	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, exe crime, untruthfulness, misuse of authority) Sexual harassment		Yes, in one or more cases	Yes (in at least one allegation)	Yes, in some cases	An aggravated sanction	No		matrix seem to have	Question 13 states to select all that apply, thowever only 1 option can be selected.	
Helen Toloza	City of Gresham Police Department	None of the above: have not yet implemented	We were awaiting expiration of then-current CBA	None								No				
Devin Lewis	Redmond Police	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were alread compliant.	One or more / disciplinary matters or investigations	Two	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	Yes (in all allegations)	Yes, in all cases	The Mandatory sanction	No		No	try to review certification suspensions and revocations in a more timely manner	No
John A. Bowles	Morrow County Sheriff's Office	Adopted policies/included in existing policies	We didn't need to do anything as we were already	None /								No				
Don Rogers	Benton County Sheriff's Office	Reviewed standards and guide	We were awaiting expiration of then-current CBA	One or more disciplinary matters or investigations	3	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority) Unjustified or excessive us- of physical force		No, standards were not applicable				No				
Jeff isham	Polk County Sheriff's Office		None of the above	One or more disciplinary matters or investigations		Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	Yes (in at least one allegation)	Yes, in all cases	The Presumptive sanction	No				
David Rash	Rogue River Police Department	Reviewed standards and guide	We were unaware of the LESC standards	None								No		n/a	n/a	n/a

1. Your name	2 Agency	3. Agency steps to adopt LESC rule?	4.Obstacles to adopting?	5. Any disciplinary matters in last year?	5a. How many?	6. Types of issues or conduct	7. Please specify other types	8. Sustained findings?	9.Were LESC standards applied?	10. Did disciplinary matters result in discipline?	sanction did your	14.Any matters arbitrated?	15. Results	regarding to	17. Recommendations for the Commission?	
		Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions	None of the above	One or more disciplinary matters or investigations	one	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)	other types	Yes, in one or more cases	Yes (in at least one allegation)	Yes, in all cases	agency impose? The Mandatory sanction	Yes	Other outcome: Matter is pending arbitration	no	no	no
Doug Marteeny	Linn County District Attorne	Reviewed standards and quide y Other: We do not employ an investigator.	None of the above	None								No		employ an investigator.	Have a simple form to fill out for agencies like mine that don't employ law enforcement investigators.	
Paul Williams	Clatsop County Sheriff's Office	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	50 Total 0 cases involving LESC 1 case involving LESC not resolved as of this date	Other issues or types of conduct	Performance, work relationships, Unprofessional Conduct, Driving, Insubordination, Attendance.	No, standards were not applicable				No		significant period of time to resolve and will be included in the next	I am not sure why were are reporting on other types of conduct, that single question is what took me the longest to research and report on as our system automatically flags LESC issues but does not compound all the other	i
Captain Sterrin Ward	Umatilla County Sheriff's Office	Adopted policies/included in existing policies Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions	None of the above	One or more disciplinary matters or investigations	1	Other issues or types of conduct	Off Duty Conduct that Brings About Public Criticism	No, standards were not applicable				No			issies.	
Brian Pixley	Columbia County Sheriff's Office		We were awaiting expiration of then-current CBA	n One or more disciplinary matters or investigations		Other issues or types of conduct	insubordination, timeliness issues	No, standards were not applicable				Yes	Other outcome: Still waiting for outcome	n/a	n/a	n/a
Jennifer Snook	Talent Police Department	Adopted policies/included in existing policies Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and qui	None of the above	None								No				604 Talent Ave PO Box 445
Jamie Russell	Lincoln County Sheriff's Office	Adopted policies/included in existing policies Provided training to staff making disciplinary decisions	None of the above	None								No		N/A	N/A	N/A
David Ham	Seaside Police Department	Reviewed standards and guide Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Other: Current collective bargaining agreement refers to LESC rules. Reviewed standards and guide	None of the above	None								No		No	No	No
David Schutt	Klamath County District Attorney	Reviewed standards and guide	None of the above. We no longer employ an investigator or other sworn officer. There is no question to mark that this may not apply to our agency.	None								No		We no longer employ an investigator or other sworn officer. There is no question to mark that this may not apply to our agency.		
Brad O'Dell	Douglas County Sheriff's Office	Adopted policies/included in existing policies Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and guide	We were awaiting expiration of then-current CBA	One or more disciplinary matters or investigations	9	Unjustified or excessive us of physical force	е	No, standards were not applicable				No				
Jodi Merritt	Polk County Community Corrections	None of the above: have not yet implemented Reviewed standards and guide	We were awaiting expiration of then-current CBA	None								No		No obstacles, current cba was in place at time of issuance of these expanded rules for Community Corrections. We have reviewed them and will be incorporating them into our upcoming bargaining and future cba.		820 SW Church Stree Suite 100
Jeremy Sanders	Roseburg Police Department	informed or provided info to officers Issued directives Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	1	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	No, officer left agency before investigation was completed.			No				
Brad Sitton	Tigard Police Dept	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	3	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority)		Yes, in one or more cases	Yes (in at least one allegation)	Yes, in all cases	The Mandatory sanction	No				
	Port Orford Police Dept.	Reviewed standards and guide	We didn't need to do anything as we were alread compliant.									No				
Peter Mahuna	West Linn Police Department	Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	None								No		No	No	No
Maureen Robb	Linn County Community Corrections	Other: We are currently in bargaining, and this is one of our topics.		None								No				

			4.Obstacles to	5. Any disciplinary matters in last				8. Sustained	9.Were LESC		sanction did your	14.Any matters	15. Results		17. Recommendations	
1. Your name John Bennett	2. Agency Washington County Sheriff's Office	3. Agency steps to adopt LESC rule? Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and guide	adopting? None of the above	year? One or more disciplinary matters or investigations	5a. How many?	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking, Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority) Other issues or types of conduct	other types	findings? No, standards were not applicable	standards applied?	discipline?	agency impose?	arbitrated? No	of arbitration	standard?	for the Commission?	address? No
Dennis Holmes	Klamath County Communit Corrections	/ Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Provided training to staff making disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were already compliant.	None /		Sexual harassment						No		No	Not at this time	No
Jeff Hattersley	Grants Pass Police Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided information to all staff that investigate or make findings or disciplinary decisions Reviewed standards and quide	We didn't need to do anything as we were already compliant.	One or more / disciplinary matters or investigations	1	Unjustified or excessive use of physical force		Yes, in one or more cases	No, other result: The case i pending arbitration.	s Yes, in all cases	A mitigated sanction	No				
Scott Hyde	Josephine County Community Justice	Reviewed standards and guide	None of the above	One or more disciplinary matters or	One	Other issues or types of conduct	Misrepresentation of the department policy	No, standards were not applicable				No				
Aaron Boyce	Crook County Community Corrections	Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Other: Crook County Community Corrections is a division of the Crook County Sheriffs Office. Information for this survey will be included in the Crook County Sheriffs Office response. Reviewed standards and quide Adopted procedures or integrated in existing procedures to routinely	We were awaiting expiration of then-current CBA									No				
Jessica Beach	of Community Justice	Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	Two Parole and Probation Officers were disciplined separately via a "written warning letter with no economic impacts. Both incidents/investigation's have been resolved		Failure to meet assigned Adult on Supervision (AOS) contact standards, required documentation of contacts and lack of AOS accountability (lack of imposed sanctions/interventions to known condition violations). Violated policy with regard by allowing a high-risk AOS on supervision for murder to live outside of Yamhill County without submission of a transfer agreement for several months and overall lack of AOS oversight/supervision.					NO		None.	None.	None.
Stephanie Brown	Washington County Sheriff's Office	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	10	Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking, Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority) Sexual harassment		No, standards were not applicable				No		No	No	No
Stephanie LaCarrubba	Multnomah County Sheriff's Office	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Issued directives Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	were concluded or resolved between Jul 1, 2024, and June 30 2025. This number includes investigation resulting in no discipline due to unfounded, not sustained, or exonerated findings; and matters resulting in discipline ranqing from verbal repriman	perceived factor of an individual's race, ethnicity, national origin, sex, gender identity, sexual orientation, religion or homelessness Lack of Good Moral character (conduct constituting a state or federal felony, DV, stalking, Drug-related offense, bias or hate crime, sex crime, untruthfulness, misuse of authority) Other issues or types of	policies or procedures; Misuse of leave or other issues related to leave administration; Failure to obey a supervisor's directives.	Yes, in one or more cases	Yes (in at least one allegation)	Yes, in all cases	The Mandatory sanction	No				

1. Your name	<u> </u>	3. Agency steps to adopt LESC rule?	4.Obstacles to adopting?	5. Any disciplinary matters in last year?	5a. How many?		7. Please specify other types	8. Sustained findings?	9.Were LESC standards applied?	10. Did disciplinary matters result in discipline?	11. What level of sanction did your agency impose?	14.Any matters arbitrated?	15. Results of arbitration		17. Recommendations for the Commission?	18. What we haven't asked and would like address?
Barry Murphy	Baker City		We were awaiting expiratio of then-current CBA We were unsure what was required for implementatior We still need to build our knowledge base on the LESC Rues. The PD had a few years of low staffing the has affected its ability to take a bigger picture look at these areas. I am unsure of whether we have fully updated all of our policies based on the rules and guidance.	ı.								No		We still need to build our knowledge base o the LESC Rues. The PD had a few years of low staffing that has affected its ability to take a bigger picture look at these areas.	n F	
Jeremy Krohn	Curry County Jail	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and quide	We were awaiting expiratio of then-current CBA	n One or more disciplinary matters or investigations	4	Other issues or types of conduct	Internal Policy Violations	No, standards were not applicable				No		I am unsure of whethe we have fully updated all of our policies based on the rules and guidance.		
Tokata Tehama	Grand Ronde Tribal Police Department	Adopted policies/included in existing policies	We didn't need to do anything as we were alread compliant.	One or more y disciplinary matters or investigations	2	while on duty	Investigation by outside agency that revealed one o our former officers met with a 17 ylo female juvenile. Nc criminal charges, but the report and complaint did nc meet the threshold of good moral character. That office ultimately resigned.	n o	No, officer left agency before investigation was completed.			No		None - guide is helpful and informative.	I N/A	N/A
James McDonald	Tigard POlice Department	Adopted policies/included in existing policies Adopted procedures or integrated in existing procedures to routinely review standards prior to making disciplinary decisions Informed or provided info to officers Informed or provided information to all staff that investigate or make findings or disciplinary decisions Provided training to staff making disciplinary decisions Reviewed standards and guide	None of the above	One or more disciplinary matters or investigations	approximately 28	Other issues or types of conduct Unjustified or excessive use of physical force	integrity and honesty. Courtesy and treatment of co-workers.	No, standards were not applicable				No		It is important to note, that although we investigated some allegations that if sustained they would fall within the OAR 26t guideline, none were sustained where this applied.	with our bargaining unit and it is used to determine the appropriate level of discipline when it is	Integrity and honesty are d areas that are missing from this survey. Many agencies hold people accountable for those things while most of what is mentioned above is rarely sustained.

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Alicia LeDuc Montgomery alicia@leducmontgomery.com +1 (704) 702-6934

August 22, 2025

LESC Commission

<u>LESC@doj.oregon.gov</u>

via email and online submission

Re: Public Comment on Strengthening Accountability and Victim Redress

Dear LESC Commission Members:

LeDuc Montgomery LLC appreciates the Commission's dedication to establishing consistent, fair, and transparent disciplinary standards across Oregon law enforcement agencies. From our perspective representing individuals in civil rights and police misconduct litigation who have been harmed or killed by law enforcement misconduct, we respectfully submit two recommendations that we believe will have material impact on public trust, accountability, and victim redress.

A. Add Two Commission Seats for Civil Rights Representation

At present, the Commission's composition disproportionately reflects leadership and labor voices within law enforcement but lacks direct representation from those who advocate for victims of misconduct. We recommend creating two additional seats: one for civil rights attorney with litigation experience representing victims of law enforcement misconduct, and one for an advocacy organization focused on constitutional and civil rights from the plaintiff perspective.

Research strongly supports the value of including civilian and civil rights perspectives in law enforcement oversight. The National Institute of Justice has found that oversight bodies with non-police members provide essential independence, improve investigative rigor, and reassure the public that misconduct is addressed fairly. Similarly, the National Association for Civilian Oversight of Law Enforcement (NACOLE) has emphasized that civilian oversight serves as a benefit to the citizens as it promotes a willingness of organizations to be more open to engagement, and provides assurances and builds trust with the community. By incorporating these perspectives directly into LESC's membership, Oregon would not only enhance the Commission's legitimacy

¹ Illinois Criminal Justice Information Authority, *The Effectiveness and Implications of Police Reform: A Review of the Literature* (2022), https://icjia.illinois.gov/researchhub/articles/the-effectiveness-and-implications-of-police-reform-a-review-of-the-literature?utm source=chatgpt.com.

² Joseph DeAngelis, Richard Rosenthal & Brian Buchner, Civilian Oversight of Law Enforcement: A Review of the Strengths and Weaknesses of Various Models, NAT'L ASS'N FOR CIVILIAN OVERSIGHT OF LAW ENF'T (Sept. 2016), https://d3n8a8pro7vhmx.cloudfront.net/nacole/pages/161/attachments/original/1481727977/NACOLE_short_doc_F INAL.pdf?1481727977.

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but also ensure that disciplinary standards better reflect the lived experiences of those most harmed

B. Mandate Transparent Reporting and Victim Notification

True accountability requires transparency. We recommend that the Commission mandate robust public reporting, including dashboards tracking misconduct categories, disciplinary outcomes, and demographic data, including the results of internal affairs investigations. In addition, victims of misconduct should receive timely notification when their complaints lead to discipline, along with access to a summary of findings.

This recommendation is grounded in well-documented evidence. Research shows that public trust and confidence in the police are strongly shaped by individual and group experiences of police conduct.³ Proactive communication such as callbacks and notification strategies significantly improves victim satisfaction and trust in law enforcement. Likewise, the U.S. Department of Justice underscore that strong communication with victims inspires community trust and supports healing.⁴

By requiring transparent reporting and victim notification, the Commission would close the accountability gap that often leaves victims feeling ignored, while strengthening public trust in the oversight system.

In conclusion, incorporating civil rights voices directly into the Commission and mandating transparency for victims and the public can significantly strengthen the effectiveness and credibility of Oregon's law enforcement accountability system. These recommendations are supported by national research and best practices in oversight and victim engagement. We urge the Commission to adopt these changes as part of its ongoing work to foster fairness, trust, and justice.

We welcome opportunities to discuss further or assist with implementation details.

Sincerely,

Alicia J. LeDuc Montgomery

Managing Attorney

Alini fle

by police misconduct.

LeDuc Montgomery LLC

³ Barbara Attard, Oversight of Law Enforcement is Beneficial and Needed—Both Inside and Out, 30 PACE L. REV. 1548 (2010).

https://digitalcommons.pace.edu/cgi/viewcontent.cgi?article=1755&context=plr&utm_source=chatgpt.com.

⁴ U.S. Dep't of Justice, Office for Victims of Crime, National Sheriff's Association, *First Response to Victims of Crime* (2010), https://ovc.oip.gov/sites/g/files/xyckuh226/files/media/document/2010firstresponseguidebook.pdf.



August 21, 2025

Dear Commissioners,

Pacific Northwest Family Circle is an organization that represents families who have personally experienced police violence, either through the loss or injury of a loved one or to themselves. We appreciate the work of the Commission in developing a common framework of discipline across the state, but we are concerned that the composition of the Commission itself leans too heavily toward law enforcement bias and life experiences. We advocate for the creation of a more diverse Commission membership by reducing the duplicative positions of two chief law enforcement officers and two members representing law enforcement labor organizations to one each. The two resulting openings should be replaced with two members representing community interests; specifically, one who has been directly impacted by police violence or misconduct, and one who has had experience with civilian oversight of law enforcement. This is summarized in the table below.

It is worth noting that replacing these two duplicative positions with two community members was proposed in a legislative action in the *original* content of <u>SB-808 in 2023</u>. This attempt to change the composition of the Commission should be revisited and implemented as soon as possible.

Sincerely,

Barbara H. Kenny, Ph.D. President, PNWFC



Current Positions of LESC	Proposed LESC composition
Executive Director	Executive Director
Member of the Senate	Member of the Senate
Member of the House of Representatives	Member of the House of Representatives
DPSST Director or Designee	DPSST Director or Designee
A/G Office A/G or Designee	A/G Office A/G or Designee
	One member who is a chief law enforcement officer
Two members who are chief law enforcement officers	Delete second position and add, "member who represents community-based organizations to represent the interests of the public." (Further, this position should be reserved for a family member directly impacted by police violence or misconduct.)
	One member who represents labor organizations who represent law enforcement officers
Two members who represent labor organizations who represent law enforcement officers	Delete second position and add, "member who represents community-based organizations to represent the interests of the public." (Further, someone with experience on a Civilian Review Committee or as a police Auditor or similar function, and who is not currently in law enforcement)
Two members who are representatives of local government to represent the interests of cities and counties	Two members who are representatives of local government to represent the interests of cities and counties
One member who represents a federally recognized Indian tribe or association of tribes within this state	One member who represents a federally recognized Indian tribe or association of tribes within this state
One member who represents the interests of the prosecutors in this state	One member who represents the interests of the prosecutors in this state
One member who represents public defender organizations or the OCDLA	One member who represents public defender organizations or the OCDLA
Two members who represent historically marginalized groups or community-based organizations that represent communities impacted by policing	Two members who represent historically marginalized groups or community-based organizations that represent communities impacted by policing

2025 LESC Annual Report

Public Comment: Jessica Renfro

Phone: Redacted

Email: Redacted

Received 8/9/25

Note from LESC Executive Director Stewart: This comment contains personal information which has been redacted.

My VA benefits and privacy have been stolen for 3 years. I made a report to officer Johnson in Keizer when I learned my ex bf wasn't my bf and he had used smart switch to copy my phone and gave it to his junkie married real gf who's an identity thief. I sent him what I said I had. He did nothing, but did track me down while I was out of town a week later, because the thief told him I'd threatened to copy his phone. A threat? Even if I had, that is a big deal but actually doing it isn't? The woman, (redacted name 1), copies 2 of my phones, still, in Dallas, Or, which is a crime there so I emailed there. I was called last year on my birthday, Sunday, Feb 4 and had accidentally emailed sheriff's office. The deputy who called was not nice. He said not to report to Dallas police and if Keizer wanted them involved, they would be and to not say a word. 5 minutes after hanging up. And officer from Keizer called. He wouldn't repeat his name, but it's recorded. He told me I had recently made a false report to him?! No, I didn't. He said officer Johnson never got my emails I said he responded. He told me to let it go and no one would believe me. An hour after that call? The emails vanished from my email site. Yeah, but I have them, forwarded to an email they don't know exists, in a different name. The ones in my phones are in my old emails that way. And that officer obviously is, too. He said no one would believe me over a cop, and so I said I could prove he got the emails because he answered them. Then they were gone. I don't believe in coincidence. (Redacted name 2) copied my phones. He love ratted to use my wounded veteran pay, I'm service connected. He never paid a dime for 4 years and I have audio recordings of him telling me he did it and gave them to identity thieves. I have screenshots of texts between him and (redacted name 1) and him and Others talking about it and texts from (redacted name 1) telling me she did.It. I. Have screenshots Of all my passwords (redacted name 1) sent from her 0wn email. I have found (Redacted name 2) asleep under my bed. He felll asleep an. Snored.he stole my driver license 3 years ago. I've had to. Pay loans they got in my name. They. Commit crime in my name. (Redacted name 2) got insurance on MY car in his name and it was on usaa since before I met him. One morning I was cold after bath and home alone and said to my cat why's it so cold, did you do it? 10 seconds later, (Redacted name 2) texted me and it said idk. Why it's so cold, I didn't do it . It's terrifying. They post ads on gross scary websites as me and post my address and invite them to break in and. Rape me. They say I

want that. And police won't help me. I'm so scared of them now too that I waited because I can't move. But now, I think, what does it matterewhat cops do to me,? I'm in hell. But, why? I'm not a criminal or known much. I do doordash with hardware busted out in my back so junkies can get to steal. Why? PlOease can someone look att this mountain of evidence I've gathered on my own? I even have a clone that (*Redacted name 3*) got from (*Redacted name 1*). (*Redacted name 2*) has. Criminal history all her life stealing identities and mail. Except since she's had mine. I'm innocent and it has to stop. No one answers me. Why don't I matter?