



Citizen Oversight Board

2025 Annual Report

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1 Letter from the Board Chair

Greetings,

Welcome to the Denver Citizen Oversight Board's Annual Report for 2025. Last year was packed full of both progress and challenges for us, and as our 20th anniversary it was also a time for both celebration and reflection. While there is work yet to do, the Denver community should be very proud of the ways that public safety systems and accountability have improved over these past two decades.

In early 2025, we strengthened our internal capacity by creating our first two subcommittees to dedicate additional attention to two key areas: management and community engagement. Over the summer we collaborated with City Council to successfully pass a new ordinance requiring additional transparency when legal settlements related to public safety include non-monetary terms such as policy changes, training, special investigations and reports. We also successfully pressed the Department of Public Safety to close a loophole where the Office of the Independent Monitor (OIM) was excluded from disciplinary settlements that were made during the appeals process. Near the end of the year, Sheriff Elias Diggins also agreed to authorize the Citizen Oversight Board to visit the jails unannounced, something that the COB has been pursuing for many years.

Even so, there is still much work to be done. At the very start of 2025, the Denver Police Department attempted to unilaterally implement a major change to discipline policy called Education Based Discipline—later changed to Education Based Development. We were able to bring this to the community's attention and with their help both prevented the policy from going into effect in 2025 and drove substantial improvements to the policy over the course of numerous revisions. We saw a very similar dynamic play out in how the Mayor and Police Department engaged with the community on the issue of automatic license plate readers from Flock Safety.

We also faced the challenge of a second full year in which the Mayor has left a vacant seat on our Board. As a result, we have been unable to operate at full strength and the weight of the work has been felt more heavily by existing members. *It is difficult for us to see the Mayor's actions as anything other than disregard for the role of oversight in the city.* This was exacerbated by the departure of two long-tenured Board members, Stefan Stein and Karen Collier. These individuals brought invaluable insight and tremendous dedication to their work on the Board and will be missed.

We remain fully committed to continuing our efforts despite these and other challenges, and hope that you will consider partnering with us to improve Denver's public safety systems by sharing your questions, concerns, and ideas with us.

Sincerely,

Rufina Hernández, 2026 Chair

Julia Richman, 2025 Chair

2 Introduction

Denver’s Citizen Oversight Board (COB or Board) was created in 2004 and consists of nine community members who are tasked with making recommendations on a wide variety of issues related to public safety. The Board also evaluates the effectiveness of the Office of the Independent Monitor (OIM) and appoints (with City Council’s consent) the head of the OIM, who serves at the pleasure of the Board. In order to do so, the Board is granted regular access to public safety department leaders as well as confidential public safety records.

Board members serve four-year terms and appointments are split between the Mayor and City Council, with one joint appointee. By ordinance, the Board is required to annually report on its activities, findings, and recommendations. This Annual Report covers the period from January 1 through December 31, 2025.

The OIM and the COB were created in 2004 as part of the reforms that were demanded in the wake of the fatal 2003 police shooting of Paul Childs, a developmentally disabled teenager. They replaced the Public Safety Review Commission, which was perceived to be ineffective at overseeing internal misconduct investigations of uniformed personnel.

The duties and authorities of the COB are established in the Charter of the City and County of Denver:

Denver Charter § 12.1.1

(B) *The citizen oversight board.* There is hereby created the citizen oversight board, the size, qualifications, composition and appointment of which shall be as provided by ordinance. The functions of the board shall be to:

- i. Assess the effectiveness of the monitor's office;
- ii. Make policy-level recommendations regarding discipline, use of force, and other policies; rules; hiring; training; community relations; and the complaint process;
- iii. Address any other issues of concern to the community, members of the board, the monitor, the manager of safety, the chief of police, the sheriff, or the fire chief;
- iv. Make recommendations as to specific cases as may be prescribed in ordinance;
- v. Exercise such other powers and duties as may be provided by ordinance; and
- vi. In addition to executing the powers and duties assigned to the citizen oversight board, the citizen oversight board shall appoint, by and with the consent of city council, the monitor or any appointee who will serve as monitor in the interim. The monitor shall serve at the pleasure of the citizen oversight board.

Figure 1: Denver COB Charter

The Board’s mission statement is: “To foster change towards cooperative, just and accountable relationships between Denver’s community and law enforcement.”

Complaints and Commendations

The COB can receive complaints against, and commendations of, uniformed law enforcement officers. Complaints and commendations may be submitted by email, mail, over the phone, or through the OIM's online complaint and commendation form. However, the COB has no investigative authority and is required to forward any complaints and commendations to the OIM and the relevant safety agency. The Board can monitor how complaints are handled and make independent recommendations.

Figure 2: Complaints and Commendations

3 Board Activities in 2025

Julia Richman served as Chair and Tymesha Watkins served as Vice-Chair for the entirety of 2025.

City ordinance requires that the Board meet with the Independent Monitor at least bi-monthly, meet with the Executive Director of Public Safety (EDOS), the Sheriff, and the Chief of Police at least once each quarter, and meet for public comment at least three times each year. With one exception, we met each of these requirements in 2025. We did not meet with the EDOS in the third quarter, due to the resignation of former EDOS Armando Saldate near the start of the quarter and the appointment of Al Gardner to the position later in that quarter.

In 2025, we held 20 full board meetings, most of which were recorded and posted on our YouTube channel. Ten of those meetings included leaders from the Department of Public Safety (DOS). The Board also held special forums on May 21 and October 13. Board members also visited jail facilities, shadowed staff at the Dener Police Department's (DPD) Real Time Crime Center, participated in ride-alongs with both patrol officers and the STAR program, and also participated in a variety of community events related to public safety.

In April, the Board adopted a two-year strategic plan and created two committees to provide additional capacity in specific areas. The Management Committee met 12 times and is focused on providing consistent and robust management of the Board's two personnel and other management matters. The Community Engagement Committee met 10 times and is focused on developing and leading the implementation of a high-level strategy for how and where to direct the Board's limited capacity to best engage Denver's communities.

As part of their continued training in oversight practices, four Board members and the Board's administrator traveled to Minneapolis, Minnesota, in October to attend the National Association for Civilian Oversight of Law Enforcement's (NACOLE) annual conference. The conference provides an opportunity to connect with and learn from civilian oversight practitioners around the country and features multiple programming tracks with sessions focused on issues including prison and jail oversight, strengthening oversight institutions, and partnering with the community. All four members were also able to attend a pre-conference training day for members of oversight boards and commissions.

In November, several Board members were also able to receive training on how to confidently interact with the media, craft compelling messages, and communicate those messages effectively.

In terms of policy, the Board dedicated a major amount of time and energy into learning about and then opposing the DPD's proposed Education Based Development policy, which would allow officers who violate policies to take paid training instead of receiving disciplinary action. We published an op-ed in

the Denver Post, submitted a public comment on the matter, hosted a community forum, and broadly worked to educate the community about the potential impacts of the policy.

The Board also experienced several membership changes in 2025, with two members leaving and one new member being appointed. Following Stefan Stein’s decision not to seek reappointment when his term expired in January 2025, the mayor appointed Dawn Holden-Hale to the Board in April. In August, Karen Collier offered her resignation alongside a statement expressing frustration with repeated examples of public safety leaders disrespecting the role of the COB and OIM, especially when it comes to disciplinary policies.¹ At the end of the year Dawn Holden-Hale also announced her upcoming departure due to personal matters requiring her to move out of Denver.

Additionally, as of the end of 2025, the Board has operated with a vacant seat that the mayor is responsible for filling for two full years. As a Board composed of community members, we feel the difference when we’re not at full strength, and we are disappointed and frustrated that the Mayor has not fulfilled his ordinance-established responsibility to fill the seat “in a reasonable and timely manner.”²

In May, COB and OIM held a community forum presenting their annual reports that was sponsored by at-large City Council Members Sarah Parady and Serena Gonzales-Gutierrez.

The board sponsored an EBD informational forum for the Latino community in September, set in the Westwood neighborhood. This event was in partnership with El Semanario, a weekly Hispanic Bilingual publication, Latino Education Coalition, and Denver Healing Generations. City Council member Serena Gonzales-Gutierrez moderated the program with the OIM, COB and Chief Thomas presenting their viewpoints on EBD.



Figure 3: The COB's May forum

¹ Karen Collier, [Resignation Letter](#), July 25, 2025.

² DRMC [Sec. 2-378\(b\)](#)

4 Review of Public Safety Activities in 2025

The following is not an exhaustive list but is intended to give a sense of the most significant public safety developments that came to our attention in 2025. Unless otherwise specified, the Board has not taken an official position on them.

4.1 Lawsuit Settlements, Judgments, and Related Appeals

In 2025, the City spent just under \$9 million to settle lawsuits related to the conduct of its public safety departments.³ The DPD was responsible for nearly all of those payments in 2025 (\$8.76 million). The Denver Sheriff Department (DSD) was responsible for \$150,000 in payments and the Denver Fire Department (DFD) was responsible for \$32,500. We are not aware of any settlements in 2025 that contained non-monetary terms.⁴

As has been true the past several years, the majority of the settlement payments, just under \$7.5 million, were related to the DPD's conduct during the 2020 George Floyd protests. In total, the City has now paid roughly \$22.2 million as a result of lawsuits related to its conduct during the protests, with an additional \$14 million in judgments still pending as the City waits for a decision from the Colorado Court of Appeals.

In May, the City successfully appealed the \$4 million judgement from 2024 that stemmed from officers improperly obtaining and executing a search warrant on the home of Mrs. Ruby Johnson. The Court of Appeals overturned the jury verdict and ordered that a new trial be held, in which the officers' misconduct, which had previously been proven to be negligent, must now be proven to the higher standard of "intentional or made with reckless disregard for the truth," and that the misconduct was the deciding factor in the warrant being granted. Following this outcome, Mrs. Johnson requested that the Colorado Supreme Court review the ruling from the Court of Appeals.

Also in 2025, six bystanders who were injured in a 2022 police shooting won a \$19.75 million civil judgement against former DPD officer Brandon Ramos. Due to the conduct involved, the charges brought, and the fact that the plaintiffs sued Ramos in his individual capacity and did not sue the City directly, the City is not liable for that judgement.

4.2 Denver Police Department

The DPD gained 45 officers on net between January 3 and December 31 of 2025. This improved their total staffing rate for uniformed positions from 95% to 98%.⁵

As described later in this report, the DPD spent much of 2025 defending its relationship with Flock Safety and their network of automated license plate readers (ALPRs). Even so, the nature of that relationship changed over the course of the year. DPD began the year fully subscribed to a national database of cameras, which allowed any law enforcement agency, including federal agencies, to freely search Denver's data. In Colorado, coordination of this kind is against the law. Later in April, they attempted to limit their data sharing to only other local law enforcement agencies in Colorado, and then unsubscribed Denver's data from the network completely in October.

³ Settlements under \$5,000 do not require approval from City Council ([DRMC Section 20-1\(d\)](#)) and are not included in this data.

⁴ [DOS Non-Monetary Settlements page](#).

⁵ As of 1/3/25, the DPD had 1559 out of 1637 authorized positions. As of 12/31/25, the DPD had 1604 out of 1637 authorized positions.

Similarly, the DPD spent much of 2025 pushing forward its proposed policy of Education Based Development, which would replace formal discipline with paid training for officers who commit policy violations for certain levels (covered in more detail in Section 6.1.2). Here too, the department made significant changes to the draft policy over the course of the year. The department did not issue a final policy in 2025.

In August, the Mayor agreed to two no-cost contracts with Skydio and Flock Safety without notifying City Council or the surveillance task force. These contracts allow Skydio and Flock to pilot “drone as first responder” programs, in which drones are flown to 911 calls ahead of police officers. The DPD flew Skydio drones over 200 times by mid-December, but did not fly drones from Flock Safety in 2025.

In early October, the DPD announced its participation in the “Blue Envelope Program,” which helps drivers with autism, dementia, or other conditions communicate with officers during traffic stops. The program began in Boulder, CO in January and has been quickly adopted by several other metro area police departments.

4.3 Denver Sheriff Department

In May, the DSD became the first jail in the nation to allow those in custody to change into regular clothing prior to participating in in-person visits with friends and family. This “Clothing Project,” was the result of a partnership with Goodwill of Colorado.

Also in May, the DSD opened a new housing unit specifically dedicated to serving military veterans. The housing pod, named the “Housing Unit for Military Veterans” or HUMV, features more freedom of movement than other housing units and special programming and support for veterans.



Figure 4: DSD HUMV Opening Ceremony

In July, the DSD updated their procedures to require that all personal mail to people in custody be sent to a third-party contractor where it will be scanned and then electronically delivered to the inmate’s tablet. This change was made as part of their efforts to prevent the introduction of contraband and drugs and follows in the footsteps of other jails around the nation.

Also in July, the DOS instituted a new practice of proactively opening an administrative investigation into every suspected overdose incident in the jails. These reviews seek to identify whether deputies were following DSD policies before and during the incident.

4.4 Other

In February, the union representing Denver firefighters passed a vote of no confidence in their leadership team with a nearly two-thirds majority. The vote followed an investigation in 2024 that identified long-term abuse of leave policies among command staff, and a perceived lack of accountability for that misconduct.

In June, the DOS’s Chief Compliance Officer Mary Dulacki was terminated for dishonesty during an internal investigation into her conduct. As Chief Compliance Officer, she was in charge of making final disciplinary determinations in cases involving police officers. She had previously filed a discrimination complaint with the Colorado Civil Rights Division. Her vacancy was not filled in 2025.

5 Evaluation of OIM's Effectiveness

The COB uses a four-pronged approach to evaluate the OIM: 1) a series of quantitative workload and performance measures; 2) an anonymous survey of OIM staff; 3) feedback from DOS leaders; and 4) an assessment from COB members on several specific OIM responsibilities.

This year, the COB also had the benefit of considering the results of an independent audit of the OIM's performance which was conducted by the City Auditor and published in September 2025.

Denver Charter § 12.1.1

(A) (ii): *The monitor's office shall:*

- actively monitor and participate in any investigations as may be prescribed in ordinance of uniformed personnel;*
- make recommendations to the manager of safety regarding administrative action, including possible discipline, for such uniformed personnel;*
- make recommendations regarding policy issues; and*
- address any other issues of concern to the community, the members of the citizen oversight board ("board") created pursuant to subsection (B) of this section, the city council, the manager of safety, the chief of police, or the sheriff.*

For purposes of this article, "uniformed personnel" means all members of the classified service of the Denver police department, all sworn members of the Denver sheriff department, and members of the Denver fire department who are authorized to carry and use firearms on duty.

Figure 6: OIM Charter Language

5.1 Workload and Performance Data

Compared to 2019 levels, the OIM is responsible for monitoring 52% more recorded complaints, 22% more investigations, and 39% more disciplinary cases. Despite this substantial growth in workload, the OIM has not increased its number of authorized staff, causing strain on the OIM's personnel. This strain was exacerbated in 2025 by multiple staff transitions as well as certain staff requiring extended periods of leave. The impact of that strain can be seen this year in the reprioritization and reduction of actively monitored cases and has also affected the OIM's timing of review disciplinary cases. Nevertheless, the OIM continued to participate in extensive outreach in 2025.

Mediations increased in 2025, although they remain below pre-COVID levels. The OIM manages the mediation contracts, but does not have direct control over the number of cases that are mediated. For mediation to occur, the allegations must be eligible and all parties involved must agree to participate. Fluctuations in the kinds of complaints being filed and the willingness of any group to agree to mediation can lead to significant changes in the total volume of mediations that occur.

The OIM provides more details about each critical incident (officer involved shootings and deaths in custody or during law enforcement contact) in their annual and semi-annual reports.⁶

Table 1: OIM Workload Measures, 2021 – 2025

2025 Workload Data	Police	Sheriff	2025 Total	2024	2023	2022
Complaint Monitoring Workload						
Community + Internal Complaints Recorded	455	748	1203	1028	1063	807
Total Investigations Reviewed	415	623	1038	994	895	749
Actively Monitored Investigations	48	75	123	227	203	100
Disciplinary Cases Reviewed	101	296	397	471	319	254
Completed Mediations	23	1	24	16	20	12
Critical Incidents Monitored						
Officer-Involved Shootings	11	0	11	4	10	8
In-Custody/In-Contact Deaths	3	8	11	10	16	10

* Critical Incident data does not include in-custody deaths that were due to chronic medical conditions or officer-involved shootings in which officers fire at animals.

⁶ [OIM Reports Page.](#)

Table 2: OIM Performance Measures, 2021 – 2024 ⁷

Performance Indicator Category	2025	2024	2023	2022
1. Percentage of DPD IAB investigations (full formal investigations and declines) reviewed by OIM prior to case closure.	100%	100%*	100%	99%
2. Percentage of DOS AIU investigations (full formal investigations and declines) reviewed by OIM prior to case closure.	100%	100%	100%	99%
3. Percentage of DPD disciplinary decisions of IAB cases reviewed by the OIM prior to case closure.	100%	100%	100%	100%
4. Percentage of DSD disciplinary decisions of AIU cases reviewed by the OIM prior to case closure.	100%	100%	100%	100%
5. Number of <u>community</u> outreach events held/attended by the OIM in a calendar year.	222	244	256	138
6. Number of <u>officer/deputy</u> outreach events held/attended by the OIM in a calendar year.	103	71	34	35
7. Number of complaint/commendation form distribution sites.	97	81	81	81
8. Percentage of community complaints referred to DPD IAB within three business days (for complaints submitted through the OIM).	91%	97%	97%	98%
9. Percentage of community complaints referred to DOS AIU within three business days (for complaints submitted through the OIM).	90%	99%	98%	97%
10. Percentage of DPD citizen complaints mediated.	7%	5%	7%	5%

* The OIM did not review one IAB investigation prior to closure in 2024 because the case was not routed to the OIM for review.

5.2 OIM Staff Survey

In January 2026, the COB asked the OIM staff to provide their perceptions of the performance of the office’s leadership and the culture of the office. We received responses from a majority of staff members. The questions covered topics related to the work of the office, staff members’ ability to execute their responsibilities, and office leadership, culture, and morale. We used these responses to inform our evaluations of both the general effectiveness of the monitor’s office and the Independent Monitor’s individual performance.

5.3 Public Safety Feedback

In January 2026, we provided public safety stakeholders with the opportunity to share their feedback on the OIM’s performance in 2025. We sent a 10-question survey to department leaders as well as six

⁷ Sometimes special circumstances apply to cases, and the OIM may have reviewed or been involved in aspects of a case before the case evolved into something outside the scope of the OIM’s responsibilities.

managers involved in the discipline process. We received responses from the Sheriff and Chief of Police, as well as two leaders involved in the disciplinary process. We used these responses to inform our evaluations of both the general effectiveness of the monitor's office and the Independent Monitor's individual performance.

5.4 Board Assessment

Board members evaluated the Independent Monitor's performance across ten key areas. The following entries reflect the consensus of the Board.

1. Communication with the COB:

The Independent Monitor continues to maintain regular communication with the Board and provides timely responses to requests for information. The Board remains well informed regarding significant incidents, investigations, and policy concerns. Presentations on major initiatives and issues—including audit findings and data system improvements—have helped support the Board's oversight role.

The Board believes there is an opportunity to further strengthen collaboration through broader engagement with individual Board members and earlier strategic discussions of emerging priorities. Continued progress in aligning the work of the OIM and the Board will enhance the effectiveness of civilian oversight. With the newly created management committee, the Board and the Monitor are working collaboratively to increase proactive communication and clarify priorities in order to more efficiently use limited Board time.

2. Monitoring of Investigations:

Monitoring the investigation portion of disciplinary cases is where the OIM has the greatest ability to impact the disciplinary process. The OIM continues to provide careful and engaged oversight of misconduct investigations. The office regularly identifies areas requiring additional investigative work and works constructively with public safety agencies to improve investigative quality.

The Board recognizes the significant operational work undertaken this year and the office's continued commitment to oversight despite staffing challenges and increased workload. As the office moves forward, the Board encourages continued development of processes that support sustainable monitoring practices and allow the OIM to focus on identifying systemic patterns and trends in investigations.

3. Monitoring of Discipline:

Monitoring the conduct review portion of disciplinary cases is the most complex part of the OIM's work, requiring technical expertise, historical knowledge of precedents, and interpersonal skills.

The OIM continues to provide independent disciplinary recommendations and maintains professional working relationships with the Department of Public Safety and its agencies. Due to staffing constraints and additional pressures such as the audit, the OIM was forced to reprioritize

staff time in 2025, leading to significant delays in their disciplinary reviews. However, that backlog of discipline cases was largely resolved by the end of the year. The Board recognizes meaningful progress in addressing the backlog of disciplinary reviews, which has improved timeliness and strengthened the effectiveness of the oversight process.

The Board encourages the OIM to continue building on these improvements by developing long-term process approaches that ensure sustained timeliness and consistency. The Board also continues to support efforts to expand public reporting of aggregate information about disciplinary recommendations and outcomes so that the public can better understand the role and impact of the OIM.

4. Monitoring Critical Incidents:

The OIM continues to respond appropriately to critical incidents and maintains procedures to ensure timely monitoring when incidents occur. An OIM staff member is always on call to respond to critical incidents. The Board recognizes the importance of this work and the office's ongoing commitment to ensuring that critical incidents receive appropriate oversight.

The Board encourages continued attention to identifying patterns and lessons learned from critical incidents and communicating those insights to policymakers and the public when appropriate, particularly when the cases are already a matter of public reporting and information could be shared more readily.

5. Production of Reports:

The OIM published the required annual and semi-annual reports in 2025. We appreciate the OIM's efforts in 2025 to better communicate its accomplishments and concerns, both in the 2025 Semi-Annual Report and in preparation for the 2025 Annual Report. These efforts represent meaningful progress toward more transparent and accessible reporting.

The Board believes there remains an opportunity for the OIM to further expand public-facing analysis, particularly by sharing trends and patterns identified through its monitoring activities. Investments in improved data systems have strengthened the OIM's analytical capacity, and the Board encourages continued efforts to translate this capacity into clear public reporting that strengthens civilian oversight and public understanding.

6. Production of Policy, Practice, and Training Recommendations:

The OIM continues to make policy, practice, and training recommendations through both published reports and direct engagement with public safety agencies. The Board recognizes the office's work in identifying areas of concern and advocating for improvements to policy and practice. The OIM took a clear and public stand against the DPD's proposed Education Based Development policy in 2025, publicly sharing their opposition to the concept of EBD in police discipline. They also issued recommendations for what they believe are necessary components of such a program should it be

implemented despite their opposition. Additionally, the OIM made private recommendations directly to the safety departments in 2025.

Much of this element of the OIM's work goes unreported to the public. As mentioned in the City Auditor's report, the OIM has conducted 44 policy and practice reviews in the past seven years, seven of which have been mentioned in the OIM's public reports during that period. The Board encourages continued development of systems to track policy recommendations and their outcomes and to communicate this work, as appropriate. Clear reporting on policy initiatives and results will help demonstrate the impact of the OIM's work and strengthen public accountability.

7. Outreach to complaint process stakeholders:

As shown above in Table 2, The OIM further increased its outreach efforts during the year, building on already high levels of engagement. The Board continues to view robust outreach—including engagement with community stakeholders and members of the law enforcement community—as essential to effective civilian oversight and has encouraged this prioritization. Given financial and staffing constraints, the Board does not expect significant additional growth in outreach volume and instead encourages the OIM to focus on increasing the impact and outcomes of its outreach efforts.

The Board also recognizes improvements in the OIM's direct communication with complainants. The OIM now sends its closure letters independently, allowing for more timely communication and reinforcing the independence of the oversight process. In addition, we see some process gaps where individual outreach is concerned and we encourage the OIM to review these matters for process improvement opportunities. While legal restrictions limit the detail that can be shared about individual cases, the Board encourages continued efforts to support complainants and promote understanding of the complaint process.

8. Oversee Mediation program:

The creation of the mediation program was led by the OIM, but the OIM does not manage the program in a traditional sense. Complaint mediation is a multi-stakeholder, consensus-based, opt-in process—which means that any stakeholder can simply decline to pursue it for any reason at any time. It is encouraging to see mediation rates increasing by 50% in 2025, and commend the work that has been done to improve uptake.

The Board encourages continued attention to increasing awareness and confidence in the mediation program and to evaluating its effectiveness as a component of the complaint process.

9. Management of OIM:

The Board recognizes the Independent Monitor's efforts to maintain the functioning of the office during a demanding period that included staffing transitions, increased workload, and significant external review. The office has continued to meet its core responsibilities and has made progress in several operational areas.

The Board believes the next stage of the office’s development will benefit from continued attention to organizational leadership, including strengthening office culture, supporting staff development, and building processes that support long-term sustainability. The Board supports ongoing efforts to develop a strategic plan and improve management practices that position the office for continued effectiveness.

10. Overall:

The OIM has always operated with a very lean staff complement. Despite significant increases in their discipline-based workload, the staff count has not meaningfully increased since 2019. On top of that, 2025 also featured extra demands on the OIM’s limited resources, including an audit from the City Auditor and unrelenting engagement with the DPD and the community about the DPD’s proposed EBD policy and its many versions throughout the year.

The work of the OIM remains essential to accountability, transparency, and public confidence in Denver’s public safety systems. The Board appreciates the dedication and effort demonstrated by the Independent Monitor and OIM staff in carrying out this important work.

The Board believes the office continues to make meaningful contributions to civilian oversight and recognizes the progress made during the past year. At the same time, the Board sees important opportunities to further strengthen the strategic impact, public communication, and long-term sustainability of the OIM’s work and looks forward to continued progress in the coming year.

6 Assessment of Public Safety Disciplinary Processes

By ordinance, the Board is mandated to report on its assessment of the disciplinary processes.⁸ This section contains descriptions of our concerns related to the disciplinary processes, as well as progress made in relation to those concerns. As detailed in Appendix A, the disciplinary processes for uniformed personnel in Denver are complex. The Board has long contended that they are too complex, with too much discretion and too many ways for uniformed personnel to avoid discipline for problematic or prohibited conduct.

6.1 Denver Police Department

In our 2024 Annual Report, we highlighted several concerns related to the disciplinary process for DPD officers. They included concerns about the DPD’s Use of Force Review Board, poor communication with complainants—especially closure letters for complainants with sustained complaints, the DPD’s refusal to proactively share body worn camera footage with the OIM, and a policy clause that allows the DPD to dismiss complaints if there is an associated lawsuit. Our concerns around each of these issues remain, and we encourage unfamiliar readers to learn more about them in our 2024 Annual Report.⁹

6.1.1 Declining Discipline Rates

In mid-2025, the DOS’s Chief Compliance Officer was terminated. This role is critical, almost singularly responsible for drafting and processing final discipline orders for DPD officers. As the EDOS role was also in transition at the same time, the department has been slow to refill the role. The result is that while the first two quarters of the year saw 14 disciplinary orders each, the third quarter saw only nine and the fourth quarter only one. No disciplinary orders at all were issued in November and December.¹⁰ This concerns the Board as the department is creating a significant backlog and on occasion in the past has used timeliness to dismiss or mitigate disciplinary action. The DPD has over 1,500 officers and it is of great concern if one unfilled role can hold up the entire disciplinary process.

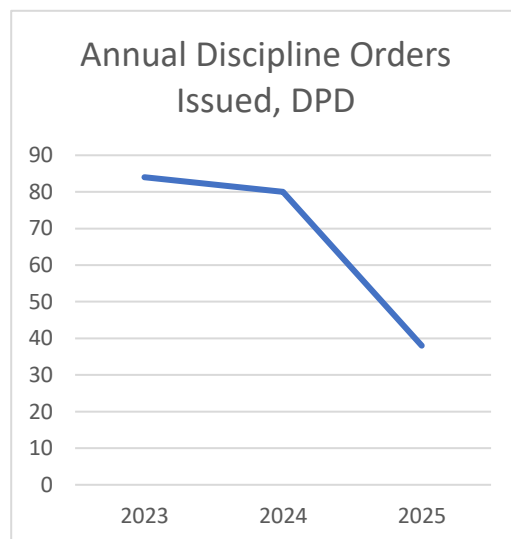


Figure 5: DPD Discipline Orders, 2023 - 2025

6.1.2 Education Based Development

The Board dedicated much time, energy and public engagement in 2025 to opposing the DPD’s proposed Education Based Development policy (EBD, formerly known as Education Based Discipline). In addition to conducting its own policy analysis and issuing recommendations to the DPD, the Board

⁸ DRMC [Section 2-384\(a\)](#).

⁹ COB, [2024 Annual Report](#), p. 19-22.

¹⁰ While the period of reporting for this report only covers 2025, no disciplinary orders for DPD officers were issued in January or February of 2026.

placed an op-ed in The Denver Post calling for the draft policy to be made public, issued a public comment once it was released and organized and participated in several community events to raise awareness about the issue.¹¹ From the start, the DPD's management of the process was significantly flawed. This included an attempt to implement a version of the policy without any review from the OIM, which is required by ordinance for any significant policy change affecting discipline. It also included unsatisfactory public engagement and a public comment process that involved publication and republication of drafts available to the public for review in the middle of the process. The drafted policy evolved significantly over the course of the year, most notably by narrowing the scope of eligible offenses and by adding language requiring that a full investigation be completed before any eligibility determination is made.

Deficient Policy

EBD is a framework to replace punitive discipline with paid, non-punitive trainings. EBD is not considered a best practice and looks substantially different across jurisdictions. Independent oversight agencies in both Los Angeles and Washington, D.C., have issued reports criticizing how EBD was implemented in those jurisdictions.

The DPD describes their version of EBD as “an innovative alternative to traditional discipline,” and frames it as the solution to two distinct problems: discipline cases taking a long time to resolve and officers not understanding what they did wrong or how they should have acted.

As for the first rationale, the COB agrees that it would be good to shorten the amount of time it takes to resolve discipline cases. Unfortunately, a thorough analysis or time study has not been conducted to identify how to make the existing process more efficient, including the steps within the DPD itself which can be 3-6 months alone. We are opposed to any attempt to speed cases up at the cost of undermining the integrity of the discipline process. From the community's perspective, it doesn't matter if cases are resolved quickly if in the end they do not result in accountability for policy violations. Unfortunately, the DPD has resisted including the kinds of safeguards we believe are necessary to protect this process from being abused.

As for the second rationale, we remain unconvinced that the DPD has a recidivism problem or that the existing discipline process is inadequate for teaching officers what they did wrong. We conducted a search of the DPD's internal discipline database and found that of the roughly 1,500 officers currently employed by the DPD, only five of them had committed the same EBD-eligible offense twice in the past 11 years. None had committed the same offense three or more times. We are not persuaded that this is an adequate rationale for a substantial policy change of this nature.

If not for strong opposition from the OIM and COB, an incredibly broad and ill-conceived version of this policy would have gone into effect at the start of 2025 without anyone outside the department, including the OIM, ever having seen the actual policy language. Despite revisions, as of the end of 2025, the proposed policy continues to lack clarity in several key areas, including:

¹¹ Julia Richman, “[Denver deserves better than a backroom deal that eases police accountability \(Opinion\)](#),” *The Denver Post*, July 28, 2025. Citizen Oversight Board, [Public Comment on Proposed Education Based Development \(EBD\) Policy](#), August 5, 2025.

1. It remains unclear how the appropriate conduct category will be determined without involving the Conduct Review Bureau. There is also no requirement that the OIM agree with the assigned conduct category.
2. It remains unclear what factors the Commander of the Accountability and Development Bureau will weigh when making EBD eligibility decisions. There is also no requirement that the OIM agree with the eligibility determination.
3. It remains unclear what the specific training classes for EBD will look like and whether it will be possible for participating officers to fail a course or what happens if they fail to fully participate.
4. It remains unclear how the program will be evaluated and what kind of metrics the EBD program will need to reach to be considered a success.

The OIM has also clearly articulated their minimum requirements for supporting an EBD policy, and the DPD has chosen not to implement them. Two of those conditions which have not been met include requiring OIM consent for cases to be diverted to EBD and for those cases to be recorded as “sustained” policy violations.

Ineffective Public Process

In addition to our concerns about the policy’s ongoing deficiencies and insufficient justifications, the DPD’s behavior as it has pursued this policy has further degraded trust. In the past, when substantial policy changes like the creation of the discipline matrix or the revision of the use of force policies were considered, community members were given a seat at the table to help develop the policy. That was not the case here. At every step, the DPD has appeared uninterested in doing anything more than what it perceives to be the bare minimum of community collaboration needed to move the EBD policy forward. The DPD never established a comprehensive process through which they would gather meaningful feedback, make changes or engage in collaboration.

Over the course of 2025, the DPD regularly made and unmade both large and small changes to the proposed EBD policy. In addition to the versions of the policy the DPD began publishing online in late July, the DPD shared different versions of the draft policy with different stakeholders at different times, making it very difficult for stakeholders to engage on a specific issue at any given time. Adding to the confusion, the policy was sometimes publicly described in ways that did not align with the drafted policy language.

One significant example of public descriptions not aligning with the written policy relates to the question of whether or not allegations will be fully investigated before EBD eligibility is determined. On July 28, the DPD published a draft policy that explicitly stated that EBD eligibility would be determined after just a “preliminary investigation.” A second version of the policy, uploaded August 8, dropped the word “preliminary,” and Chief Thomas gave an interview to Denver7 that same day in which he stated that a full and complete investigation would be done before any eligibility determination was made.

Both Chief Thomas and the Mayor leaned heavily on that assertion during a meeting with City Council on August 19, but the word “preliminary” was reinstated in the third version of the policy published on September 2. Despite the drafted policy requirement reverting to just a “preliminary investigation,” Chief Thomas repeatedly asserted that a “thorough and complete” investigation would be completed

before EBD eligibility was determined. He even went so far as to falsely state that “it was never the intention” to have cases diverted to EBD prior to a full investigation.

Fortunately, the fourth public version of the EBD policy, published on November 20, explicitly states that a full investigation will be completed and reviewed by the OIM prior to an EBD determination.

A similar dynamic played out with the question of whether EBD would be made available for repeated or substantially similar offenses. Although Chief Thomas consistently stated that EBD would not be available for repeated offenses, DPD removed the relevant policy language from the published draft between August 8 and November 20.

As a third example of this dynamic, DPD said the policy would not apply to “willful” misconduct. Yet no published version of the policy has had any corresponding language, defined “willful,” or articulated how such a standard could be applied.

Conclusion

Over the course of 2025, the COB, OIM, and community were successful in preventing EBD from being implemented and in pushing for significant improvements to be made to the drafted policy language. Unfortunately, the draft policy as published in mid-November remains inadequate and the Board continues to oppose EBD.

6.1.3 Flock Safety

The DPD’s approach to its contract with Flock Safety in 2025 had several unfortunate parallels with their approach to EBD. As described in the previous section, the DPD engaged in assertive, but not always accurate, defenses of its conduct while slowly being forced to backtrack from its original positions. This dynamic has had a significant negative impact on our trust in the DPD’s assertions and its willingness to meaningfully engage stakeholders prior to making significant decisions.

When the DPD first introduced the Flock ALPR network in May 2024, Chief Thomas assured the Board that its use would be limited to identifying stolen vehicles and those involved in violent crimes or hit-and-runs. Furthermore, the transparency dashboard created by the DPD listed only Colorado-based law enforcement agencies.

Neither of those representations were accurate. Due to an implementation error, data from Denver’s ALPR network was accessible on a nationwide network for nearly a full year, during which time it could be searched for any reason by Federal law enforcement among others, which violated state law. The DPD was not aware of this fact and did not conduct any kind of meaningful audit of the search logs until approximately April 2025.

Alongside other concerned stakeholders, the COB sent a letter¹² in early May asking City Council to decline the renewal contract that had been presented to them. Shortly before the final vote, Mayor Johnston asked City Council members to decline the renewal so that changes could be made. He then executed a six-month contract extension with no known policy changes valued at just under the \$500,000 threshold that requires Council approval. This was done despite guidance in Executive Order 8,

¹² COB, [Letter to City Council Opposing Flock Contract](#), May 5, 2025.

which governs procurement for the city, stating that contract values cannot be changed in order to skirt reviews, and that contracts near the threshold should receive council review as well.¹³

Over the summer, the Mayor's office created a task force to consider this contract and the use of surveillance technologies in Denver. That task force met for the first time in August, but with limited structure and a limited amount of data available to it. Additionally, when the six-month contract extension ran out in October, the Mayor did not consult the task force before signing another six-month extension at no additional cost. Significant changes were made to the contract in October that restricted the sharing of Denver's data, though the damage had already occurred.

Relatedly, that October contract extension brought to light significant tensions around the role of the City Auditor and the power of the mayor. Denver's Charter ([§ 5.2.1\(D\)](#)) states that, with only one exception, "the Auditor shall countersign and register all contracts" to ensure that the City's financial commitments and relationships are all in line with applicable law. Yet the no-cost extension was not countersigned by the auditor in 2025. Nevertheless, the Mayor has stated publicly that he believes the auditor's signature is not needed for the contract to be fully executed.

Around the same time as that October contract extension, it was revealed that the DPD had signed another no-cost contract with Flock Safety in August for a 12-month pilot program for drones that fly to 911 calls ahead of officers. Those drones are also capable of being integrated into Flock Safety's license plate reader network and using Artificial Intelligence to operate autonomously, although Chief Thomas told us in December that the department would not be using those additional capacities.

Our trust in the Mayor and DPD was further eroded by assertions that turned out not to be accurate. For example, the DPD repeatedly asserted that it owned and controlled the images and data captured by Flock's cameras while the contract's language gives Flock ownership of city data.

6.1.4 Use of Force Review Board

Over the past several years, we have repeatedly highlighted our concerns about the DPD's Use of Force Review Board in our annual reports. Our concerns remain.

In summary, the Use of Force Review Board is intended to take the most serious use of force cases, often police shootings, and provide an independent review of whether the conduct should be found in-policy or out-of-policy. Unfortunately, as we have described in previous reports, we continue to have concerns that the Use of Force Review Board does not serve its intended purpose. We remain concerned that the members of the review board may instead be providing a review that is no more independent than a purely internal process, while providing the appearance of a more rigorous review.

The review board is composed of five voting members: two DPD Commanders, one member from another Colorado law enforcement agency, and two individuals chosen from a pool of potential community members. The OIM is allowed to attend the review board's meetings but is not a voting member.

The DPD is supposed to select and train a pool of community member participants who rotate through serving on the board, but for many years has relied on the same two community members for all meetings. We have previously recommended that the DPD create an open and transparent application

¹³ Mayor Michael Hancock, [Executive Order 8](#), February 8, 2020, p.14. Mayor Mike Johnston updated Executive Order 8 in November 2025.

process for community members interested in serving on the review board, and that they work to create a pool of community members that represents the perspectives of the broader Denver community. The DPD took some small steps in 2024 to allow interested community members to apply to join the Board. However, only one new community member was added to the pool in 2024 and 2025. We also remain concerned about the quality of its work, the specifics of which are broadly shielded from public disclosure.

Although officially the review board only makes recommendations to the Chief of Police, it has significant influence on the outcomes of cases. As reported in the OIM’s 2025 Semi-Annual Report, the OIM believes that the Conduct Review Bureau should have more thoroughly reviewed the conduct of two officers involved in the 2022 LoDo shooting that injured six bystanders. However, the Use of Force Review Board had recommended that the conduct of the two officers be found to be in-policy, and the DPD did not engage in any further review of those two officers’ actions.

6.2 Denver Sheriff Department

6.2.1 Plummeting Discipline Levels

In our 2024 Annual Report, we highlighted with concern the fact that disciplinary orders issued to DSD deputies—representing all disciplinary actions greater than a reprimand—had dropped by 30% in one year, to the lowest level since 2008.¹⁴ We stated that the sharp decline was likely due to a backlog of cases in the Administrative Investigations Unit, which is responsible for investigating allegations of misconduct against deputies and which had experienced a period of significant leadership and staff changes.

Since then, the number of disciplinary orders issued to deputies has dropped an additional 54%, with the DOS issuing just 12 such orders in 2025. Fluctuations in discipline rates are common, but the dramatic decline over the past two years is, to our knowledge, unprecedented. We are concerned that the discipline process is not operating in the way that the community expects it to be. It should also be noted that we believe this decline in DSD discipline is fully distinct from the similar decline in DPD discipline, as the DOS’s former Chief Compliance Officer was not directly involved in issuing disciplinary orders for DSD deputies.

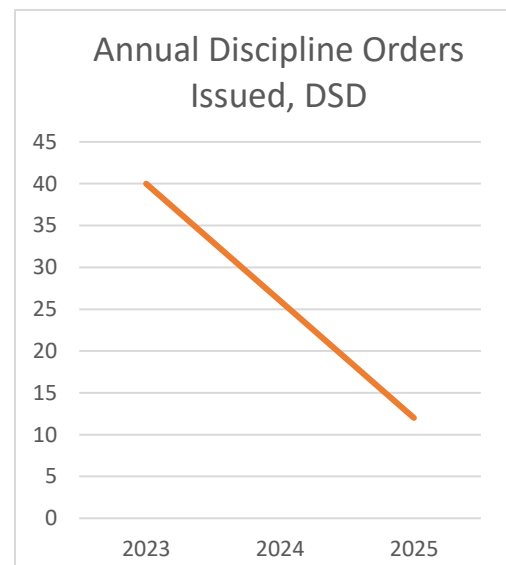


Figure 6: DSD Discipline Orders, 2023 - 2025

¹⁴ COB, [2024 Annual Report](#), p. 24 – 25

7 General Concerns

By Charter, one of the Citizen Oversight Board’s core responsibilities is to “Address any other issues of concern to the community, members of the board, the monitor, the manager of safety, the chief of police, the sheriff, or the fire chief.” This section describes a variety of such issues.

7.1 Continued DSD Understaffing

The DSD is authorized to employ 875 full-time uniformed personnel and 254 full-time civilians (also called professional staff), not including contracted or on-call workers. It began 2025 with 601 uniformed employees and ended the year with 580, a net decrease of 21 individuals (to 66% capacity). This reversed progress made in 2023 and 2024 when the department had gained 19 and 12 deputies, respectively.¹⁵

All deputies continue to be required to work at least 24 hours of pre-scheduled mandatory overtime each month. However, many are required to work much more than that in both scheduled and unscheduled mandatory overtime. Deputies continue to regularly work 14 and 16-hour shifts, which have significant negative impacts on both employees and those in their custody.

For employees, this can result in decreased physical and mental health, poor morale, and limit their capacity to de-escalate tense situations.¹⁶ Inmates may receive less time out of their cells, fewer showers, and fewer opportunities to participate in self-improvement options such as continuing education, job training, or recovery programs.

Civilian staffing levels at DSD are similarly concerning. The DSD began 2025 with 175 professional staff and ended with 156, a net decrease of 19 individuals. This compounds the loss of 22 staff in 2024. Although rarely in the spotlight like deputies, these staff play critical roles in maintaining the jail’s operations and providing services and programming to people in custody. It is not clear to us how many of these losses are related to required budget cuts and how many are due to an inability to hire qualified individuals. The DSD and the City as a whole must prioritize addressing this critical issue.

7.2 Correctional Health Care

As we have described in previous Annual Reports, there are still areas in which we would like to see more transparency about Denver Health’s activities, especially the timeliness of the provision of prescription medications.

We are encouraged to see continued transparency around the number of medical grievances (complaints related to medical care, distinct from requests for care). A total of 1390 medical grievances were submitted in 2025, of which Denver Health sustained 47. The majority of cases, 1032, were deemed unfounded. Denver Health closed cases in an average of 11.5 days, with only three taking more than 30 days to close. This represents a slight increase in total grievances, a slight decrease in sustained cases, and a reduction in the average time to case closure.

¹⁵ Starting and ending staff numbers are accurate as of 1/6/25 and 1/20/2026.

¹⁶ See for example: Vila, Bryan. [Impact of long work hours on police officers and the communities they serve](#). American journal of industrial medicine. 49. 972-80. (2006). 10.1002/ajim.20333.

Additionally, the DSD’s Jail Medical Administrator has visibility into each grievance that is filed. This is significant, as our longstanding concerns about the quality of Denver Health’s internal investigations and the City’s lack of access to related records remain.

7.3 Closing the Assessment-Intake-Diversion (AID) Center

Citing budget pressures, the Office of Neighborhood Safety attempted to quickly and quietly shut down the AID Center in June, taping a piece of paper to its door that announced its closure in less than a week’s time. Not even the AID Center’s director was told in advance about the closure announcement. After immediate and intense pushback from the community, that closure was postponed. The AID Center was ultimately closed in August with the layoff of its two full-time staffers.

Just after it was closed, the Colorado Hispanic Bar Association formally awarded the AID Center its annual Organizational Community Service Award. The award decision was made prior to the AID Center’s closure, and the association’s president told Denverite that the AID Center had been nominated “by essentially all of the Denver County court judges, recognizing how important they viewed the work that they do.” The AID Center had also recently received a \$1.5 million grant to provide special services aimed at helping minority women overcome trauma. That work was never performed.

With just two full-time staff utilizing city-owned office space, the AID Center operated at very low-cost and generated an incredible return on investment. It relied on voluntary ongoing partnerships with a dozen other city and state agencies and 30 nonprofit organizations, all of which believed that sending their staff to work at the AID Center was a better use of their time than their normal duties. As one example, DDPHE’s Wellness Winnie mobile clinic would regularly get three times as many contacts when it was stationed at the AID Center than when it went anywhere else, according to the AID Center’s former director.

The AID Center also indirectly helped the court system operate more efficiently by providing lockers, bike/scooter storage, and pet kennels for people with court dates or probation appointments. As of early 2025, the AID Center had provided storage services an impressive 5,600 times. It was also seeing an average of 90 visits per day, excluding special events. Special events could dramatically increase those numbers, with 1,662 people served Thanksgiving meals at the AID Center in November 2024 and over 1,000 attendees at a felon-friendly job fair that same month.

7.4 The Support Team Assisted Response (STAR) Program¹⁷

As we have described in previous annual reports, the City has consistently failed to provide strategic leadership of the STAR program, which sends medical and mental health professionals to certain 911 calls instead of police officers. Unfortunately, the STAR program has only had the capacity to respond to roughly half of the calls that are designated as “STAR-Eligible.

With just two employees assigned to the program full-time at the start of the year, the program’s capacity has largely been limited to maintaining the status quo.¹⁸ In August, one of those two full-time employees was laid off, further reducing the City’s capacity to lead the program. In September, the Mayor proposed a 2026 budget that, among many other cuts, removed \$1.4 million from the STAR

¹⁷ It is the position of DDPHE leadership that because the STAR program is not managed by the DOS, it is outside the COB’s purview. We disagree.

¹⁸ Additional managerial staff are involved in the STAR program, but as part of a portfolio of responsibilities.

program's budget moving forward. The program relies on a mix of funds from the City and from grants, but the proposed cut would have reduced the total program budget by approximately 20%. When City Council pushed back on the cuts to STAR, the Mayor's Office told them to use their own money to fund the program. Subsequently, City Council passed two amendments to the budget that restored \$578,000 to the program's budget, with \$80,000 coming directly from City Council's budget, \$380,000 coming from the DPD, and \$118,000 coming from the DOS, leaving the program with a roughly 12% budget cut for 2026. The department has stated that the budget cuts did not impact the STAR program's services, and represented money that had historically been set aside but underspent by the contractors that operate the STAR program.

Challenges with City Alignment of Accountability and Authority

For most of 2025, the City's stake in the program was split into three parts. DDPHE managed the contracts that include all the vans and the professionals in them, the Office of Neighborhood Safety had the STAR Operations Manager, which it had taken from Denver 911 in 2024 when the office was created, and Denver 911, which was still responsible for all dispatching decisions that assign STAR vans to calls for service.

As was described in a March presentation to City Council, disagreements between the three departments involved in STAR often had to be escalated to the Executive Director level before decisions and compromises could be negotiated. Perhaps as a result of this dynamic, the program continued to lack any kind of strategic plan to align the half-dozen key partners and provide a vision and deliverables that additional funding can be tied to.

This three-way split was improved towards the end of 2025 when the STAR Operations Manager was transferred from ONS to DDPHE. We are hopeful that this shift will allow for more cohesive leadership moving forward. Without substantial changes to how the City approaches and manages the program, we fear that it may follow the same path as the AID Center.

8 Recommendations

Per City Charter, the Board is tasked with making “policy-level recommendations regarding discipline, use of force, and other policies; rules; hiring; training; community relations; and the complaint process.”¹⁹

8.1 2025 Recommendations

Based on our assessments and concerns as detailed in this and prior Annual Reports, we believe that implementing the following recommendations would improve both public safety generally and the community’s relationships with public safety agencies.

Denver Police Department:

1. The DPD should formalize and shift its approach to major changes in policy and practice to be more transparent and include a collaborative development process.
2. The DPD should not implement the proposed Education Based Development policy and should instead conduct a thorough and collaborative review with a community coalition of the existing discipline process, similar to what was accomplished in 2006 - 2008 and 2017 - 2018.
3. DPD should update its closure letters to ensure that they all include a summary of the complaint, the names of the subject officers, the potential violations investigated, and the findings for each allegation. If a policy was violated, the letter should also include the disciplinary action taken and a departmental apology.
4. The DPD should re-evaluate its approach to recruiting community members to serve on its Use of Force Review Board and prioritize the selection of a pool of community members who can serve on it.
5. The DPD should begin proactively sharing all use of force footage with the OIM, as a step towards unfettered access to BWC footage for OIM.

Denver Sheriff Department:

6. The DSD should clearly identify and communicate the root causes of the significant decline in discipline.
7. The DSD and the City should continue to prioritize recruitment and retention efforts for both uniformed and professional staff.
8. The DSD should continue to build on its work to improve the transparency around the services that Denver Health provides to people in custody, especially around the timeliness of validating and providing pre-existing prescription medications.
9. The DSD should continue to build on its work to prevent overdoses and interdict drugs being introduced into the custodial environment.
10. The DSD should continue to build on its work to encourage and facilitate in person visits for people in custody.

¹⁹ Denver [Charter § 12.1.1\(B\)\(ii\)](#).

Department of Public Safety:

11. The DOS should ensure that disciplinary processes can be effectively completed despite changes in staffing and that any disciplinary actions currently stuck in the backlog are not modified or mitigated as a result of delays.
12. The DOS should emphasize the importance of better communication with community complainants. This may take several forms, including acquiring a public-facing portal for IAPro, improving training for staff in the disciplinary process, and/or increasing staff capacity.
13. For incidents where both criminal and administrative investigations are warranted, the DOS should direct administrative investigators to begin their investigation concurrently with the criminal investigation.
14. The DOS should create a public database of disciplinary orders.
15. The DOS should fully support and collaborate with the surveillance task force as it works to build a lasting framework for introducing surveillance technologies.

Other Agencies:

16. The City should significantly increase the size of the OIM's budget in order to ensure that it has the capacity to perform not just reactive monitoring but proactive reviews of policies and practices. The City should also consider amending ordinance to require that the OIM's budget increases correspondingly with budget increases for the safety departments.
17. The City should make a major investment in its capacity to strategically lead and manage the STAR program, alongside the financial investments to improve the program's service delivery capacity.
18. The Mayor should, without any further delay, appoint community members to the vacancies so that the COB can operate at full capacity.

Appendix A: Overview of Denver’s Law Enforcement Discipline System

The DOS is headed by the Executive Director of Public Safety (EDOS) and staffed with civilians. The EDOS is a Mayoral appointee and is responsible for, among other things, managerial oversight of the Denver Police Department (DPD), Denver Sheriff Department (DSD), Denver Fire Department (DFD), 911 Emergency Communications Division, and a variety of safety programs. The Mayor also appoints the heads of the DPD, DSD, and DFD.

Public safety employees are split into two separate personnel systems. DSD deputies and most civilian employees are part of the career service system, while police officers and firefighters are part of the civil service system. The work of the COB and OIM is primarily focused on employees who are issued badges and carry guns, and for the purposes of this report those employees are collectively described as “uniformed personnel.” The City employs a total of approximately 2,200 uniformed personnel, consisting of roughly 1600 police officers, 580 sheriff deputies, and 11 fire investigators. These uniformed personnel are subject to a more complex disciplinary process than other employees, as will be described below.

Any member of the public can file a complaint against any uniformed personnel that they believe has acted improperly. Complaints can be filed anonymously and can be made by anyone, including witnesses or those who heard about an incident from someone else. The complainant does not need to know the names or badge numbers of the individual(s) who are the subject(s) of the complaint, nor do they need to cite the specific policies they believe were violated.

Complaints against uniformed personnel can be submitted to the COB, the OIM, or directly to the applicable department’s internal investigative office. The easiest way to file a complaint or commendation related to the DPD or DSD is through the OIM’s online form.¹⁰ The DFD hosts its own online form for complaints or commendations related to its personnel.¹¹

Historically, the police, sheriff, and fire departments all had their own offices that were responsible for investigating allegations of misconduct concerning uniformed personnel and recommending appropriate discipline. This is still the case for the DPD and DFD. However, the DSD’s internal affairs function was replaced in 2019 by a Public Integrity Division (PID) staffed by civilians and housed within the DOS.

Each of the police, sheriff, and fire departments splits the internal affairs function into two separate teams. The first team is composed of investigators who are responsible for gathering evidence and conducting interviews. In the DPD and DFD, the team of investigators is grouped under the label of the Internal Affairs Bureau (IAB). In the PID, they are called the Administrative Investigations Unit (AIU). The second team is responsible for evaluating all the available evidence and making judgment calls related to whether a policy was violated and if so, how severe the violation was. This function is called “Conduct Review” and the corresponding teams in the DPD, DFD, and PID are called the Conduct Review Bureau (sometimes Office), Board, and Unit, respectively.

Once a complaint is submitted, it must go through several stages before any discipline can be imposed:

1. **Triage:** This stage is managed by the investigations team and consists of an initial review to determine whether the complaint can be closed quickly without conducting a formal investigation. Complaints may be closed at this stage (commonly referred to as a “decline”) for a variety of reasons, including duplicate complaints, complaints against policies rather than individuals, and complaints against civilian employees or employees of other jurisdictions. In these instances, investigators complete a preliminary investigation and gather evidence that is readily available, typically including incident reports, body worn camera or security footage from DOS facilities, and sometimes an interview with the complainant. If the footage clearly demonstrates that the alleged actions did not occur or did not violate policy, the complaint can be declined. If, after the preliminary review, the conduct in question is determined to be at worst a very minor violation or consist of poor performance rather than a policy violation, the complaint may be handled as an “informal,” and sent to a supervisor to debrief with the subject without a formal investigation or any official findings being made. If the issue is primarily related to poor communication or a misunderstanding, the case may also be handled through mediation. All involved parties (complainant, subject, OIM, and Internal Affairs) must agree to mediation for it to occur.
2. **Formal Investigation:** This stage is also managed by the investigations team and consists of investigators taking a more active role in finding evidence. Investigators are expected to interview everyone involved and find and request evidence that may be held by third parties like medical records or security camera footage from nearby businesses. If necessary, investigators may also interview subject matter experts. The OIM typically reviews the investigation file once it is completed and can make recommendations for additional work. For certain cases, the OIM may choose to “actively monitor” the investigation and review each step as it is taken, including being present for interviews. When the OIM actively monitors an investigation, they can make recommendations at any time. If the investigators decline to implement a recommendation from the OIM, the OIM can either escalate the issue to departmental leadership and potentially the EDOS, defer to the investigators and allow the process to proceed, or conduct a supplemental investigation of their own.
3. **Conduct Review:** Once all available evidence has been gathered, it is presented to the appropriate conduct review team. This team reviews the evidence and is responsible for making initial findings about whether or not there is sufficient evidence to believe it is “more likely than not” that a policy violation occurred. If the conduct review team recommends sustaining a policy violation, they must then determine the appropriate severity level or “conduct category” and whether or not there were significant mitigating or aggravating circumstances. The OIM is able to review the conduct review team’s initial recommendations and make recommendations of their own if they disagree.

4. **Leadership Decision:** The recommendations from the conduct review teams and the OIM, if applicable, are presented to departmental leadership. If departmental leadership wants to move forward with any discipline more severe than a reprimand, they must hold a “Contemplation of Discipline Hearing” at which all involved parties are present and able to correct the record if necessary.²⁰ If departmental leadership still wishes to move forward with discipline greater than a reprimand following the Contemplation of Discipline Hearing, they must submit a written disciplinary request to the EDOS, who has the final say and can approve, modify, or decline the requested discipline.
5. **Appeals:** Uniformed personnel are able to appeal their discipline to the overseers of their respective personnel system. Deputies may appeal to the Career Service Board, and police officers and firefighters may appeal to the Civil Service Commission. Both personnel systems assign a hearing officer to hold a hearing and make an initial decision, although those decisions can be further appealed to the full Board or Commission by either the EDOS or the subject personnel. Cases can also be appealed through the court system if a party believes applicable law was not followed.

This process is intended to ensure that complaints will be handled properly, that any resulting investigation will be thorough, and that public safety leaders will hear an external perspective before they make any disciplinary decisions. The OIM is tasked with reporting on overall trends in complaints and discipline, which can inform policy recommendations.

The Board is not directly involved in each step of the investigatory and disciplinary process like the OIM but is able to review confidential records and provide recommendations for both specific cases and general policies as it sees fit. The Board is also tasked with independently evaluating the effectiveness of the OIM and the oversight process.

²⁰ The Sheriff is also able to issue formal notices of improvement.

Appendix B: Status of Prior Recommendations

Denver Police Department

2024.1: The DPD should begin proactively sharing all use of force footage with the OIM, as a step towards unfettered access to BWC footage for OIM.

- *No progress. The DPD continues to reject this recommendation.*

2024.2: The DPD should remove OMS 503.01 Section (5)c from its Operations Manual and treat all allegations of officer misconduct the same, regardless of whether or not there is a related lawsuit. At a minimum, the DPD should provide the OIM with an opportunity to review any complaints that may be the subject of civil litigation and provide input on whether it would be appropriate to close the case.

- *No progress. The OIM did engage in additional conversations with the City Attorney's Office about providing the OIM with copies of civil complaints/lawsuits when they are submitted.*

2024.3: The DPD should not require complainants alleging police misconduct to pay a fee in order to learn how their complaint was handled. All closure letters should include a summary of the complaint, the names of the subject officers, the potential violations investigated, and the findings for each allegation. If a policy violation is found, the letter should also include the disciplinary outcome and a departmental apology.

- *No progress.*

2024.4: The DPD should follow through on their commitment to create a public dashboard for their drone program before starting to use drones as a first responder.

- *Implemented. The DPD began using drones as first responders in October 2025 and has published a corresponding data dashboard.*

2024.5: The DPD should re-evaluate its approach to recruiting community members to serve on its Use of Force Review Board and prioritize the selection of a pool of community members who can serve on it.

- *Minimal progress. One additional community member was selected in 2025, in addition to one in 2024.*

Denver Sheriff Department

2024.6: The DSD should build upon its dashboard of Denver Health's work and include data related to the types of treatment receiving complaints, the timeliness of prescription verification and provision, as well as optometrist visits and the provision of eyeglasses

- *Partially implemented. The DSD has updated its dashboard to include data about optometrist visits and the provision of eyeglasses. The timeliness of prescription verification and provision, as well as additional details about grievance topics remain unavailable.*

2024.7: The DSD should ensure that they have visibility into any of Denver Health's After Action Reports or internal investigations following serious incidents.

- *No progress. Sheriff Diggins has agreed that visibility into these reports would be valuable for the DSD, but has stated that they are not something that he can unilaterally require Denver Health*

to share. The City's operating agreement with Denver Health for 2026 did not include any additional transparency requirements.

2024.8: The DSD should work to identify the root cause(s) for the net loss of 22 professional staff and the City should eliminate any barriers to hiring qualified individuals for those positions.

- *Progress has been made on recruitment, although the DSD's staffing rates have decreased on net due to a wave of anticipated retirements.*

2024.9: The DSD should work to encourage the use of their new in-person visitation facility and remove any unnecessary barriers to its utilization.

- *Substantial progress. Usage rates have improved, and with the start of their first-in-the-nation Clothing Project, the DSD has made substantial efforts to improve and encourage the use of their in-person visitation facility.*

2024.10: The DSD should continue to invest in overdose prevention efforts for those in custody.

- *Some progress. The DSD has moved forward with the creation of a task force focused on combatting drugs and contraband in the jails, and has also begun requiring that all personal mail be sent to a third party contractor site to be scanned and delivered electronically. Impact is being evaluated.*

Department of Public Safety

2024.11: The DOS should pay close attention to the operations of the AIU and ensure that it is equipped to appropriately address the backlog of cases that has developed.

- *Possible negative progress. Discipline rates for DSD deputies decreased further in 2025, although the exact cause is unclear.*

2024.12: The DOS should update their post-appeal settlement practices to ensure compliance with the ordinance requiring the involvement of the OIM in that process.

- *Fully implemented. Former EDOS Armando Saldate issued a directive on July 25, 2025, requiring that the OIM be given the opportunity to review and comment on any post-appeal disciplinary settlements.*

2024.13: The DOS should ensure that they promptly address any disciplinary orders and mitigate any unnecessary delays in that process.

- *Negative progress. Following the termination of the Chief Compliance Officer in mid-2025 and the subsequent vacancy for the remainder of the year, delays in disciplinary cases related to police officers have dramatically increased.*

2024.14: The DOS should finalize a formal policy requiring the publication of any settlements that include non-monetary terms and evidence of compliance with those terms.

- *Substantially implemented. Although not a formal policy, the DOS has a practice in place of publishing settlements with non-monetary terms, as well as evidence of compliance with those terms. Additionally, an ordinance was passed requiring additional transparency of such settlements which will allow the COB and OIM to independently verify the DOS's transparency in this area.*

2024.15: The DOS should emphasize the importance of better communication with community complainants. This may take several forms, including acquiring a public-facing portal for IAPro, improving training for staff in the disciplinary process, and/or increasing staff capacity.

- *No known progress.*

Civil Service Commission

2024.16: The CSC should review the training process for its hearing officers to ensure that they are familiar with Denver’s discipline process for police officers, including the role of the COB and OIM. The CSC should also consider using the Monaco Shooting example in its training as a case study in how not to determine the appropriateness of decisions by departmental leadership.

- *No known progress.*

2024.17: The CSC should provide the OIM with an opportunity to participate in the appeals process at both the hearing officer and full commission levels. This could take a number of different forms, with one possible option being allowing them to file a written statement either before the hearing or after the hearing but before a final decision is issued.

- *No known progress.*

Appendix C: Board Membership



Julia Richman, 2025 Chair, currently serves as VP of Business Development and Government relations for the AI company CivCheck. She previously served as the Senior Vice Chancellor for Operations and Strategy Implementation at the University of Denver, the Deputy Executive Director of the Colorado Governor’s Office of Information Technology, Chief Innovation and Technology Officer for the City of Boulder and a Senior Manager with Deloitte Consulting. Julia has experience overseeing large institutions as they optimize operations. She was named Outstanding Woman in Business by the Denver Business

Journal in 2022, was a Colorado Governors fellow and graduate of Leadership Denver. Richman was born and raised in the Denver Metro area. She received her MPP from the University of Chicago and BA from Dartmouth College.

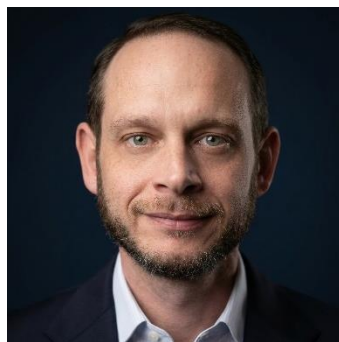
Tymesha Watkins, is a native of Denver and an accredited software engineer and activist. She is passionate about working with our youth and providing opportunities for them to explore STEM fields. She has served as the Engineer in the Classroom Lead. She is an advocate for racial equality and developing platforms that normalize diverse and inclusive environments. With that focus in mind, she led a strategic planning group to develop and maintain diversity-centric hiring pipelines at her previous organization. She is a current commissioner on the Denver African American Commission. She holds a Master of Science Cyber Technologies from University of Maryland University College and a Bachelor of Science in Aviation Management Technologies from Metropolitan State University of Denver.



Karen Collier is a proud native of Colorado. She attended both public and parochial elementary, junior high, and high schools throughout the Denver Metropolitan area. Karen obtained an Associates Degree from Mile Hi Court Reporting College and retired from a 32-year career as a Court Stenographer for the Second Judicial District of the Denver District Court in 2009. Since her retirement, she has committed to achieving social justice, having worked on the board and grant-making committee of the Chinook Fund, a philanthropic organization seeding community-led, systemic change by mobilizing resources for grassroots social justice

groups across Colorado; co-founder and board chair of Out4Life Colorado, delivering HIV prevention services to the African-American communities in the Denver Metro Area; past board president for The Center for Trauma and Resilience; The Center; volunteering with Rainbow Alley, its LGBTQ+ youth outreach program; and One Colorado, as co-chair for the People of Color Caucus. In addition to the appointment to the Citizen Oversight Board, she serves as a co-chair of Park Hill Congregational Church UCC’s partnership with the Women’s Homelessness Initiative; a program of the Capital Hill United Ministries, providing daily lunches to women who access services at the St. Francis Center.

Rufina Hernández, retired from her position as the Associate Director of the Office of Equal Opportunity at the University of Denver (DU) in 2021, having previously served as the Executive Director of the Colorado Civil Rights Division. A graduate of the Georgetown University Law Center, Hernández has a long career of civil rights advocacy. She honed her skills as a trial attorney with the Legal Aid Society of Metropolitan Denver and has litigated class action lawsuits involving consumer protection and represented domestic violence assault victims in civil court. In 1989 she was appointed as the Assistant Dean of Students at University of Denver Law School. Subsequently she went on to be selected as the Executive Director of the State Bar of New Mexico, becoming the first Latina in the nation to lead a state bar organization. Her career also encompassed work as the executive director of the Latin American Research and Service Agency (LARASA), the director of the National Education Association's Human and Civil Rights department, and director of the Campaign for High School Equity in Washington DC. Her most recent volunteer activities include a three-year term on the Civil Service Commission for the City and County of Denver and serving as a board member for Disability Law United, a disability rights legal advocacy organization.



Don Long is an operations and organizational effectiveness leader with more than 13 years of experience improving execution, accountability, and team performance in complex, high-volume environments. He specializes in translating strategy into practical systems that help organizations operate consistently and effectively. Don serves as a member of the Denver Citizen Oversight Board, where he contributes a focus on governance, transparency, and institutional accountability. He holds a Bachelor of Science in Human Resource Management and is continuing his management studies through Harvard Extension School.

Larry Martinez is a proud native-born Coloradan, raised in the inner city of Denver. He has been an active community member all his life. As a youth Larry performed anti-drug theater with the West Side Drug-Free Youth Team and worked with several community groups on cultural awareness and professional development. Larry worked with Denver Inner City Parish (a secular human services organization, known as DICP) for 20 years. During that time, he directed youth out-of-school time programs, food pantries, senior-citizens' programs, community dinners, gift distributions, and sober living facilities. Larry then became the Executive Director of DICP for 6 years. Larry now owns a business that provides consulting, construction management, building maintenance and cleaning services. He is married and a proud father of four wonderful children.





David Martinez is a first-generation college graduate. He attended Colorado State University where he majored in Political Science. He is a proud Chicano organizer who grew up in the Westside of Denver. David has participated in, and has been critical of, our legal and political institutions in meeting the material and spiritual needs of communities. Currently, David is a research and program manager at Ednium: The Alumni Collective. Ednium's mission is to mobilize public school alumni as a powerful force to change the way cities educate and reinvest in its homegrown talent. During his organizing work, David has helped organize

brown and black folks who maneuver our differing institutions in their path for liberation in genuine manners. He helped organize and facilitate the first Colorado Latino Political forum for U.S Congressional District 8. He also worked with the UCLA Latino Public Policy Institute to create a Latino lens for Proposition FF (Healthy School Meals For All).

Alfredo Reyes is the proud son of Mexican immigrants and a proud Denverite born-and-raised on the Westside. He earned a B.A. from The Colorado College in Political Science and Spanish. He received a professional certificate in Mediation at the University of Denver before achieving an M.A. in Educational Foundations, Policy and Practice from CU Boulder, School of Education, and then spending three years in a doctoral program at UC Santa Cruz in Education Research. In his free time, Alfredo loves to ride his Bianchi road bike, travel (to over 17 countries so far!), cook, create art, and spend time with his loved ones.



Dawn Holden-Hale is a people and culture leader with over 20 years of experience driving strategic initiatives in diverse industries across the globe. She is the Head of Human Resources for Gibbs Smith, a publishing company with a mission to enrich and inspire humankind. Dawn is an active board member with numerous boards she cares deeply about. She earned a Master of Organizational Leadership from the University of Denver, and a Bachelor of Science in Criminal Justice from Metropolitan State University of Denver. She also holds her PHR and SHRM-CP certifications, and additional study in HR analytics and diversity

management. In her free time she enjoys fly-fishing and camping around the Rocky Mountains, and exploring her East Colfax neighborhood with her husband and four dogs.

Staff



Daniel Van Schooten was hired as the Board's administrator in 2021. In that capacity, he manages administration, logistics, and finances on the Board's behalf, including the training of new members. He also serves as the Board's primary liaison with both the city and community. Previously, he worked for the Project On Government Oversight, a nonpartisan, nonprofit federal government watchdog group. His responsibilities there included investigating federal whistleblower allegations and coordinating a training program for congressional staff. He holds Bachelor's degrees in Economics and International Relations from Wheaton College.

Appendix D: Contact Information

The Board looks forward to working with both the community and the Department of Public Safety over the next year. Members of the public are always welcome to join the Board's twice-monthly meetings and various special events or provide their thoughts to the Board through one of the options below. The Board's 2026 meeting schedule is available on our website, as are copies of recent reports, meeting minutes, and meeting recordings. Older records are available upon request.

The Board shares updates via the following channels:

- Website: www.denvergov.org/COB
- Facebook: <https://www.facebook.com/DenverCOB/>
- Twitter: https://twitter.com/denver_cob
- YouTube: https://www.youtube.com/@Denver_COB
- Email List: <https://eepurl.com/dnUb9D>
- Linktree: <https://linktr.ee/DenverCOB>



Connect with the Board

<https://linktr.ee/DenverCOB>

You can contact the Board in any of the following ways:

- Email: COB@DenverGov.org
- Leave a voicemail at: (720) 913-3150
- Social Media (listed above)
- Mailing Address:
Citizen Oversight Board
c/o Office of the Independent Monitor
201 W. Colfax Ave., 9th Floor
Denver, CO 80202