



PAB

**POLICE
ACCOUNTABILITY
BOARD**

CHARTER SECTION 18 FULFILLMENT REPORT

*Submitted to: Mayor of Rochester | Rochester City Council | PAB Board | PAB Staff
August 28, 2025*



Reporting Period: 07/01/2024- 06/30/2025

Executive Summary

Reporting Period: July 1, 2024 – June 30, 2025

This report details the efforts and accomplishments of the Rochester Police Accountability Board (PAB) in fulfilling the mandates outlined in Article XVIII of the Rochester City Charter during the period July 1, 2024, to June 30, 2025. It provides a comprehensive review of activities carried out in support of the agency's responsibilities, including investigation of complaints, policy review, community engagement, disciplinary matrix reform, transparency through regular reporting, and board/staff training. The report also addresses the impact of the April 2025 ruling in the Locust Club II case, which significantly altered the scope of the PAB's investigatory powers. Each section includes detailed evidence of fulfillment, including outputs, documentation, and outcomes aligned with the Board's mission and statutory obligations.

Context and Legal Update

The PAB was created through a community-driven process and a 2019 referendum that overwhelmingly passed with the support of nearly 75% of Rochester voters. The intent was to establish a civilian-led body with the power to investigate complaints of police misconduct, issue findings, and recommend disciplinary action, while also evaluating systemic police practices and engaging the public in reform efforts.

The Board's powers were tested in the courts almost immediately, and a 2020 court decision curtailed the Board's ability to issue binding discipline. Despite this, the PAB retained authority to independently investigate misconduct and provide discipline recommendations. Throughout 2021–2024, the PAB operationalized this authority, hiring staff, training investigators, launching an intake process, and beginning to issue investigative findings.

On April 28, 2025, the Monroe County Supreme Court issued a decision in *Locust Club v. City of Rochester* (Locust Club II), ruling that the PAB could no longer conduct investigations into police misconduct. This decision was based on the court's interpretation of Civil Service Law and collective bargaining rights, which the court found to preclude the PAB from exercising investigatory authority parallel to the Rochester Police Department's Professional Standards Section.

This ruling significantly altered the work of the PAB. Investigations were immediately suspended. All active casework was halted and could not proceed to findings or adjudication. The PAB, in response, swiftly restructured its operations to ensure compliance with the court's ruling while maintaining its Charter obligations in other areas. Staff from the Accountability Division were reassigned to document allegations in a non-investigatory capacity and to identify patterns and practices for policy review.

This report is organized by the seven tasks required by Charter Section 18 and includes context on how each task was adapted or fulfilled in light of the new legal framework.

Key Accomplishments

- **Investigative Integrity:** From July 1, 2024 through June 30, 2025, the PAB received 145 complaints and initiated 128 investigations, concluding 28 before the court ruling suspended its authority. Staff implemented an interim process to ensure continued accountability through intake, documentation, and evidence preservation.
- **Disciplinary Matrix Reform:** The PAB conducted a comprehensive review of the disciplinary matrix in partnership with internal divisions. Recommendations include creating new misconduct categories and clarifying tiered sanctions—steps that promote fairness and align with national best practices.
- **Policy Development:** Through rigorous research, community engagement, and data analysis, the PAB issued two major policy proposals (Mass Gatherings and Cost of Misconduct) with 12 total recommendations. Nine public input sessions ensured that community voices were centered throughout.
- **Community Outreach & Accessibility:** The PAB expanded multilingual access, engaged every district in the City, and strengthened youth outreach through its participation in the City of Rochester's Youth Advisory Council. Staff and board members completed language access training and ensured public forums were inclusive and equitable.
- **Transparency through Reporting:** Published monthly, quarterly, and annual reports submitted to the Mayor and City Council and posted online for public review. To access these reports please visit: <https://www.rocpab.org/data-and-reports/>
- **Audits and Evaluations:** Internal and external evaluation planning advanced in 2025, including strategic planning aligned with legal changes, SWOT analyses, and preparation for independent review of agency performance.

- Board and Staff Training: The agency delivered more than 300 hours of comprehensive training in areas such as oversight law, trauma-informed response, implicit bias, and police procedures—ensuring that staff and Board members are prepared, informed, and aligned with the Charter.

Why This Report Matters

This report reflects the PAB’s unshakable commitment to its mission: advancing public trust, equity, and justice through meaningful oversight. While the legal landscape has shifted, the work detailed in these pages demonstrates that accountability does not stop at a courtroom door. It continues through public education, policy change, transparent reporting, and unwavering responsiveness to the people of Rochester.

The PAB stands resilient and ready—not only to adapt, but to lead. With each Charter obligation addressed and every challenge met with resolve, this report affirms that community-led oversight is not a moment, but a movement—one that continues to evolve, persist, and serve.

The remainder of this report provides a detailed account of each Charter-mandated task, including supporting documentation, methodologies, and key outcomes.

For additional information and related materials, please visit

<https://www.rocpab.org/data-and-reports/> or contact the PAB at pab@cityofrochester.gov.

For full access to text of Rochester City Charter Section 18 please visit:

<https://www.cityofrochester.gov/sites/default/files/2024-07/Rochester%20City%20Charter%20Section%2018.pdf>

Task 1: Investigate and Adjudicate Police Misconduct Complaints

Charter Reference: §18-5

Mandate: The PAB is empowered to independently receive, investigate, and make findings on complaints involving sworn officers of the Rochester Police Department. The agency may subpoena evidence, compel testimony, hold hearings, and recommend discipline. These investigatory powers were suspended on April 28, 2025, due to the Locust Club II ruling.

Activities and Outcomes: Between July 1, 2024, and April 28, 2025, the PAB received 145 complaints via phone, online portal, in-person intake, and mail. Of these, 128 complaints met jurisdictional criteria and were formally opened as investigations. A total of 28 investigations were completed and adjudicated by PAB Panels composed of Board members.

Investigations adhered to the Board-approved case prioritization matrix, interview protocols, and evidentiary standards. The Investigations Division conducted interviews with complainants, officers, and witnesses; collected documentary and physical evidence; reviewed body-worn camera footage; and drafted detailed case summaries. Completed cases were reviewed in Panel Hearings, and findings were submitted to the RPD and Mayor's Office.

On April 29, 2025, the Executive Director suspended all open investigations and reassigned Investigations Division staff to Accountability Inspectors under the Policy and Oversight Division. These Inspectors continued to document allegations without making findings or conducting further investigatory steps. This adaptation preserved the substance of complaints for long-term review of systemic issues, consistent with the Charter's broader oversight mission.

Outputs:

- 145 complaints received
- 128 cases opened; 28 investigations completed
- Investigation tracking logs, evidence checklists, and witness statements (on file)
- Post-ruling documentation process for 77 preserved case files

Transition Planning and Adaptation

Following the April 28, 2025 Locust Club II court decision, all open complaints were redirected for Policy and Oversight review. An interim process was created to maintain integrity and consistency in complaint handling. All new complaints are now routed through Accountability Inspectors, who manage documentation and secure evidence preservation for future reference.

Evidence of Fulfillment

Please visit <https://www.rocpab.org/data-and-reports/> to access the following:

- Status update letter, Report Update Policy and Oversight Letter, and Complaint Confirmation letter.
- Quarterly Reports (Q1, Q2, Q3, Q4) publicly document case activity and outcomes.
- Finalized Investigative Reports detail the scope of investigative actions, including methods, evidence reviewed, policies implicated, and conclusions reached.

Please visit <https://cityofrochester.i-sight.com/login> to access:

- Case IQ (i-Sight) remains the centralized platform for case tracking and documentation.

Task 2: Develop and Maintain a Disciplinary Matrix

Charter Reference: § 18-5

Mandate: The Charter requires the PAB to develop a disciplinary matrix that categorizes types of officer misconduct and establishes presumptive penalties, including progressive discipline and aggravating/mitigating factors. The matrix must be developed in consultation with the Chief of Police, the President of the Locust Club, and community stakeholders.

Activities and Outcomes: Throughout the reporting period, the Policy and Oversight Division led an internal task force composed of investigators, analysts, legal counsel, and community engagement staff to conduct a comparative analysis of disciplinary matrices used in oversight agencies across the country. The task force examined matrices from Washington, D.C., Chicago, Newark, and San Francisco, among others.

Informed by this analysis, the task force developed a revised draft of the Rochester Disciplinary Matrix that introduced new categories of misconduct, such as “Procedural Abuse” (e.g., repeated violations of body-worn camera policies) and “Community Trust Violations” (e.g., discriminatory conduct or excessive use of force). The matrix introduced five levels of misconduct severity and aligned presumptive penalties with officer rank and prior discipline history.

The revised draft was shared with the Chief of Police and Locust Club President on March 14, 2025. The PAB also facilitated two community listening sessions in April 2025, collecting feedback from over 80 residents. Feedback emphasized the importance of transparency, consistency, and public reporting of disciplinary outcomes.

Formal adoption of the matrix was paused. However, all matrix documents and stakeholder feedback were preserved for future engagement and Charter-compliant application.

Outputs:

- 45-page draft revised disciplinary matrix with explanatory guidance
- Summary of best practices from 7 cities
- Community feedback report
- Correspondence logs with RPD and Locust Club

Evidence of Fulfillment

Please visit: <https://www.rocpab.org/data-and-reports/> for more information.

Task 3: Review and Recommend Changes to RPD Policies and Procedures

Charter Reference: §§ 18-3(J), 18-5(K)

Mandate: Annually review and evaluate policies, procedures, practices, and training of the RPD and make recommendations to improve transparency, accountability, and effectiveness.

Activities and Outcomes: The Policy and Oversight Division published two policy reports:

1. **Policing at Mass Gatherings: Balancing Public Safety and Constitutional Rights** (October 2024) This report analyzed the RPD's deployment tactics, use of force, and arrest protocols at large protests and public events from 2020 to 2023. It highlighted inconsistencies in officer behavior and accountability, especially in response to racial justice demonstrations.
2. **The Cost of Misconduct: An Analysis of Civil Settlements and Disciplinary Outcomes in Rochester** (February 2025) This report examined over \$10 million in civil settlements related to officer conduct from 2018 to 2023. It linked the lack of public disciplinary records to repeat incidents involving a small number of officers.

Together, the reports issued 12 policy recommendations, including standardizing use-of-force reporting, requiring trauma-informed crowd control training, and increasing public access to officer disciplinary history.

Outputs:

- Two policy reports submitted to City Council and published online
- Research citations, public comment summaries, and RPD policy memos (on file)
- PAB staff testimony delivered during Council Public Safety Committee hearings

Evidence of Fulfillment

Please visit <https://www.rocpab.org/policy-oversight/> for additional information about the Policy and Oversight Division and its work.

Task 4: Community Outreach and Accessibility

Charter Reference: § 18-7(B)

Mandate: Enhance accessibility and transparency by engaging the public, particularly underserved communities, and ensuring all materials are available in multiple languages and formats.

Activities and Outcomes: The PAB's Public Awareness, Communications, and Engagement (PACE) Division coordinated a total of 9 public forums (one per City Council district), each attended by 30–120 residents. Interpretation was provided in Spanish and ASL at every session.

To expand accessibility:

- The agency implemented a multilingual intake process, offering complaint forms in six languages.
- A new accessibility tool was added to the PAB website to support text-to-speech and visual contrast customization.
- Staff met with over 20 community-based organizations to distribute Know Your Rights materials.

In October 2024, the PAB participated in the City of Rochester's Youth Advisory Council which was launched with 12 high school students from across Monroe County. The group held monthly meetings and presented a Youth Policing Recommendations Memo to PAB leadership in May 2025.

Outputs:

- Outreach attendance logs and media kits
- Language access training records for all staff
- Youth Council agendas and meeting summaries

Evidence of Fulfillment

- [Charter Tracker Documents](#)

Task 5: Publish Monthly, Quarterly, and Annual Reports

Charter Reference: § 18-11(A)

Mandate: Issue regular public reports on complaints received, investigations initiated and closed, case timelines, and PAB performance metrics.

Activities and Outcomes: The Accountability and Transparency Division compiled and published the following during the reporting period:

- 12 Monthly Operational Reports (July 2024 – June 2025)
- 4 Quarterly Complaint Trend Reports
- 1 Annual Report (covering FY2023–2024)

These reports included visual dashboards, charts, maps of complaint origin by ZIP code, and explanations of key trends. Reports were disseminated via website, social media, and City Council packets.

Outputs:

- Internal data integrity reviews and audit trails
- Summary of distribution metrics and stakeholder responses

Evidence of Fulfillment

Monthly, Quarterly and Annual Reports:

Please visit <https://www.rocpab.org/data-and-reports/> to access Monthly, Quarterly and Annual Reports from July 2024 to June 2025:

Task 6: Perform Audits and Evaluations

Charter Reference: § 18-5

Mandate: Conduct internal and external evaluations of agency performance and impact, including strategic planning, goal-setting, and public accountability.

Activities and Outcomes: In November 2024, the Executive Director launched a comprehensive strategic planning process in partnership with Hanmer Consulting. The process included a staff SWOT analysis, division-level goal setting, and alignment with anticipated Charter changes.

Key themes included the need for clearer internal communication protocols, improved interdivisional collaboration, and a more robust data collection system. These themes informed an internal audit template and a timeline for a 2025–2026 external audit.

In April 2025, the Board reviewed a revised Strategic Framework to guide future work.

Outputs:

- Strategic Plan draft and Division Charters
- Staff-wide feedback surveys
- Consultant-prepared audit readiness checklist

Evidence of Fulfillment

- [PAB Draft Division Mandate and Responsibilities](#)

Visit <https://www.rocpab.org/data-and-reports/> to access the following:

- Final PAB SWOT Analysis Report
- PAB Executive Director Strategic Planning Meeting Agendas
- DRAFT Strategic Goals and Priority Areas Post Court Ruling
- Draft Division Charters and Board SWOT Agenda

Task 7: Board and Staff Training

Charter Reference: § 18-7

Mandate: Ensure that all PAB members and staff receive training relevant to oversight law, investigations, ethics, and community engagement.

Activities and Outcomes: Between July 2024 and June 2025, the PAB hosted or participated in 50 trainings, totaling 346 hours. Topics included:

- NYS Public Officers Law and Ethics
- Legal frameworks for oversight under Civil Rights Law 50-a and FOIL
- Interviewing vulnerable populations
- Community trauma and restorative practices
- Navigating police culture
- Media relations and public narrative framing

The Board also participated in an annual retreat in January 2025, which focused on strategic visioning, role clarity, and organizational alignment.

Partners & Facilitators Include

- Association of Inspectors General (AIG)
- Center for Dispute Settlement
- Coordinated Care Services, Inc. (CCSI)
- Empire Justice Center
- Greater Rochester Chamber
- Law Enforcement & Emergency Services Video Association (LEVA)
- Monroe County Office of Mental Health
- NACOLE (National Association for Civilian Oversight of Law Enforcement)
- Public Training Agency Council
- Rochester Police Department (RPD)
- St. Joseph's Neighborhood Center
- Workplace Development Institute

Outputs:

- Training rosters and attendance sheets
- Learning evaluations and post-training action plans
- Guest speaker list and topics (including NACOLE, NYCLU, and the Brennan Center)

Evidence of Fulfillment

- [Calendar of completed training sessions.](#)

Conclusion

The Rochester Police Accountability Board's 2024–2025 Charter Section 18 Fulfillment Report affirms that, even in the face of unprecedented legal setbacks and operational limitations, the PAB remains steadfast in advancing transparency, accountability, and justice in public safety oversight. Over the course of this reporting period, the agency fulfilled each of its Charter-mandated duties through robust investigations, strategic policy reform, dynamic community engagement, and continuous internal reflection and training.

The Rochester Police Accountability Board met its Charter responsibilities through comprehensive planning, cross-divisional collaboration, and a commitment to transparency and public service. While the April 2025 Locust Club II court ruling curtailed the PAB's authority to conduct independent investigations, it did not derail the agency's mission. Instead, the Board pivoted—developing alternative processes to maintain complaint tracking, uphold public accountability, and redirect efforts toward impactful policy work and community education.

Across all seven Charter tasks, the PAB demonstrated its capacity to adapt with integrity, ensuring that oversight in Rochester remains vigilant, community-centered, and data-informed. This report is more than a record of compliance; it is a testament to resilience. It reflects a community-driven body that not only met legal mandates but responded to changing realities with innovation, transparency, and a commitment to transformative public service.

This report reflects not only past performance but also a roadmap for future progress. The PAB will continue to pursue excellence in oversight, honor the will of the voters, and work toward equitable, just public safety in the City of Rochester. The work continues—grounded in purpose, powered by public trust, and driven by the belief that independent civilian oversight is not optional, but essential.

Access to all reports, findings, meeting agendas and meeting minutes can be found at: <https://www.rocpab.org/meeting-notes/>