

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES
OF AMERICA,**

Plaintiff,

v.

**BALTIMORE POLICE
DEPARTMENT, et al.,**

Defendants.

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CIVIL NO. JKB-17-0099

**SUBMISSION OF THE MONITORING TEAM
OF THE PROPOSED BUDGET FOR FISCAL YEAR 2024 FOR APPROVAL**

Pursuant to paragraph 448 of the Consent Decree entered in this matter, ECF No. 2-2 (as modified by ECF Nos. 39 and 410), the Monitoring Team for the Baltimore Police Department (“Monitoring Team”) hereby submits for approval its proposed Budget for Fiscal Year 2024, attached as **Exhibit 1** (“Budget”). The City of Baltimore (the “City”), the Baltimore Police Department (“BPD”), and the Department of Justice (“DOJ”) have reviewed the proposed budget and concur with it.

Introduction

The budget estimates the fees and expenses the Monitoring Team expects to incur for its work between July 1, 2023 and June 30, 2024. The July 1 – June 30 period covers the latter part of the Sixth-Year Monitoring Plan, which runs through mid-March 2024, and the first part of the Seventh-Year Monitoring Plan, which will run from mid-March 2024 through mid-March 2025. The July 1 – June 30 period also tracks the City’s fiscal year, which is what the City uses to budget and allocate funds for the Monitoring Team’s work.

The estimated fees and expenses for the budget year that runs from July 1, 2023 to June 30, 2024 are \$1,581,838. That is more than the \$1.475 million allotted annually under the Consent Decree.

In prior years, the Monitoring Team, with the approval of the parties and the Court, operated by aggregating its annual \$1.475 million allotment over time, such that in some years the budget exceeded that amount and some years it was less than that amount, with the average remaining below \$1.475 million. Given the amount of work to be completed in the Seventh Year, the Monitoring Team is changing course and requesting of the Court an increase above the \$1.475 million limit pursuant to paragraph ¶ 450. The Monitoring Team is still hopeful that its budget will fall below the limit in future years, bringing the year-by-year average below the \$1.475 amount set forth in the Consent Decree. Nevertheless, because of the intense work currently required, the prior structure is not workable. Moreover, the Monitoring Team plans to conduct as much assessment work as possible this year, rather than deferring that work to later years. While spreading assessment work across multiple years may keep the budget below \$1.475 million each year, it would be inefficient and would unnecessarily prolong the supervision under the Consent Decree to do so. Accordingly, the Monitoring Team hopes that by working vigorously in FY 2024, it will both incur less cost in the long run and shorten the overall length of supervision.

The amount of work that the Consent Decree requires during Fiscal Year 2024 is considerable, and the budget required over the \$1.475 million limit is not the result of a failure in planning, budgeting, or performance. *See* Consent Decree, ECF No. 2-2 at ¶ 450. The progress that must be made will require significant time and effort. Indeed, even \$1,581,838, while necessary to conserve the City's finite resources, will not cover all the work the Monitoring Team must do. That work will include: (1) real-time oversight & technical assistance on substantive areas covered by the decree, including assistance with the development and revision of policies and training and

observation of training and other activities; (2) comprehensive formal assessments of BPD's performance in, among other areas, use of force, misconduct investigations, sexual assault investigations, stops, searches, and arrests, responses to individuals in crisis and individuals with behavioral health disabilities, transportation of individuals in custody, First Amendment protected activity, and officer assistance and support to determine whether the implemented changes in policies and training are actually reforming policing in Baltimore; and (3) other requirements including court reports and filings, attending court proceedings, and team management.

In this budget year, the Monitoring Team's work will continue to focus on (2). That is, we will increasingly shift our focus from providing technical assistance and performing assessments on policy revisions and training to performing assessments on *outcomes*—to determining whether BPD officers are performing their duties constitutionally and in compliance with Consent Decree requirements.

The Monitoring Team will continue to do a significant amount of its work pro bono, or free of charge. In its first four-plus years, from October 2017 through June 2023, the Monitoring Team contributed \$2,670,711.95 or 23.4% of its work, pro bono, at no cost to the City. The attached budget shows that the Monitoring Team is estimated to contribute at least \$226,152, or roughly 13.3% of its work, pro bono in Fiscal Year 2024. All members of the Monitoring Team are committed to doing pro bono work because they are dedicated to ensuring that BPD achieves the institutional change that the Consent Decree prescribes.

The Process for Drafting the Proposed Budget

A. How the Hours Were Assigned

The Monitoring Team includes specialists in policing and police reform, civil rights enforcement, psychology, social science, organizational change, data and technology, and community engagement. The budget shows the number of hours the Monitoring Team estimates it

will work from July 2023 through June 2024 on (1) real-time oversight & technical assistance (broken out by substantive area); (2) compliance reviews and outcome assessments (broken out by each area assessed, and tasks required for each assessment); and (3) additional Monitoring Team responsibilities. The more work the Monitoring Plans require in a particular area, the more hours the budget assigns to the Team members assigned to that area. For instance, because the Monitoring Plans require a substantial amount of work on compliance reviews and outcome assessments, the budget allocates comparatively more hours to work in that area.

Subject matter assignments are based on Team members’ roles, experience, and expertise.

The subject matter assignments of each Team member are set forth in the chart below:

	Team Lead	Other Team Members Assigned
Community Engagement	Chuck Ramsey	Wanda Watts (primary liaison) Miller Roberts (coordinator) ¹ Jessica Drake Hassan Aden
Community Policing	Chuck Ramsey	Nola Joyce
Stops, Searches, Arrests, and Voluntary Police-Community Interactions	Theron Bowman	Evan Shea Tracey Meares
Impartial Policing	Tracey Meares	
Responding To and Interacting with People with Behavioral Health Disabilities or in Crisis	Randy Dupont	Roberto Villasenor

¹ Miller Roberts transitioned off of the Monitoring Team in late 2023 but is nevertheless included here because the budget covers July 2023 through June 2024.

Use of Force	Roberto Villasenor	Matthew Barge Chuck Ramsey Hassan Aden Theron Bowman Nola Joyce Roberto Villasenor Kathleen O’Toole Sean Smoot
Interactions with Youth	Roberto Villasenor Randy Dupont	
Transportation of Persons in Custody	Roberto Villasenor	Sean Smoot
First Amendment Protected Activities	Evan Shea	Chuck Ramsey
Handling of Reports of Sexual Assault	Nola Joyce	Kathleen O’Toole Chuck Ramsey Hassan Aden Theron Bowman Roberto Villasenor Katie Zafft
Technology	Maggie Goodrich	
Policies (Coordination)	Theron Bowman	
Training (Coordination)	Matthew Barge	Roberto Villasenor
Supervision (including Field Training Officer Program and Early Intervention System)	Sean Smoot	Nola Joyce Maggie Goodrich (EIS)

Misconduct Investigations and Discipline	Hassan Aden	Matthew Barge Kathleen O’Toole
Coordination with Baltimore City School Police Force	Roberto Villasenor	
Recruitment, Hiring, and Retention	Sean Smoot	Nola Joyce
Staffing, Performance Evaluations, and Promotions	Nola Joyce	Sean Smoot
Officer Assistance and Support	Sean Smoot	Roberto Villasenor
Assessments	Matthew Barge Megan McDonough	Evan Shea Hassan Aden Tyeesha Dixon Jonathan Smith ² Eve Gushes Gabriela Wasileski Christine Cole Terri Wilfong Katie Zafft ³

Section I of the budget allocates total hours for real-time oversight and technical assistance work broken down by subject area. Again, as the Consent Decree has progressed to a later stage, the amount of time allocated to that work has been scaled back.

Section II of the budget allocates time to the compliance reviews and outcome assessments the Monitoring Team plans to conduct in FY 2024. That time is broken down as appropriate for each

² As with Miller Roberts, Tyeesha Dixon and Jonathan Smith have both transitioned off the Monitoring Team but are included here to include their work in FY 2024 before they left.

³ Gabriela Wasileski is a professor at the University of Baltimore. Christine Cole, Sarah Lawrence and Katie Zafft are consultants with the Crime and Justice Institute, a division of Community Resources for Justice. Working collaboratively and with other team members, principally Matthew Barge and Megan McDonough, they develop methodologies for and perform the quantitative outcome assessments required by Paragraph 459 of the Consent Decree.

assessment for work on incident review/conducting the assessment, data analysis, real-time technical assistance providing interim reviews of the results of the assessment with the parties, and report writing and collaboration with the parties on drafts of the report. Some of the assessments were begun in FY 2023, so the budget for those assessments includes only the latter categories of work. This is the most substantial portion of the budget.

In addition to allocating hours to work on specific Consent Decree topics, Section III of the budget allocates hours for drafting required reports, court filings, monitoring plans, and other formal public communications. As the Consent Decree provides, these documents are the principal method of communicating to the Court and the public about the Monitoring Team's work and the Monitoring Team's findings about BPD's progress. The Monitoring Team is required to produce two written reports each year. Writing these reports is a collaborative process. For every report, each Team member allotted report writing hours is expected to produce a preliminary draft of the section of the report pertaining to the topic for which he or she is responsible, then legal subject matter expert and team administrator Evan Shea will take all of the preliminary draft sections, as well as his own, and prepare the full, final report.

The budget also allocates hours to Monitoring Team leadership for "court communication, critical incident attendance, and project management." These responsibilities include meetings and communications with Judge James K. Bredar, showing up on-scene and participating in briefings regarding critical incidents such as police-involved shootings, and management, coordination and review of the work of the subject matter experts by lead monitor Ken Thompson, and deputy monitors Chuck Ramsey, Theron Bowman, Hassan Aden, and legal subject matter expert and team administrator Evan Shea. Mr. Thompson oversees the entire project and is the final decision-maker for the Team. Mr. Ramsey assists Mr. Thompson in his general oversight role. So does Mr. Shea, who, in addition to being the principal drafter of the Team's reports and court filings, manages the

bulk of the Team's administration and oversees Team responsibilities in the areas of stops/searches/arrests, First Amendment-protected activities, and assessments. Mr. Bowman and Mr. Aden are also responsible for directly overseeing Team responsibilities in certain areas. Mr. Bowman, for instance, oversees Team responsibilities for policy revisions and stops/searches/arrests, while Mr. Aden manages Team responsibilities for use of force, misconduct/discipline, and supervision.

B. The Monitoring Team's Hourly Rates

In addition to performing significant work pro bono, Monitoring Team members or their employers will be compensated at hourly rates that are lower than the hourly rates they customarily earn. Because of each Team member's pro bono commitment, effective hourly rates are even lower. Hourly rates remain unchanged from the hourly rates in the Monitoring Team's very first budget, submitted in early 2018.

Most subject matter experts on the Team will be paid \$235 per hour. \$235 per hour is consistent with the rate paid for subject matter experts working under other Consent Decrees, the rates the Team's subject matter experts customarily earn working in consulting capacities for law enforcement agencies engaged in reform. The Venable law firm will be paid \$475 per hour for the work of Mr. Thompson and Mr. Shea. \$475 per hour is both substantially lower than their ordinary hourly rates and within the range of the standard, court-established rates for court-awarded attorneys' fees in this Court in civil rights and other cases for lawyers with equivalent experience.⁴ Lead community engagement liaison Wanda Watts earns \$235 per hour, community engagement coordinator Miller Roberts earns \$75 per hour, and the Team's nine neighborhood liaisons (one for

⁴ In the proposed budget attached as Exhibit A, the rate for certain assessment work is listed as a "blended rate" of \$275 per hour. This is meant merely to provide an average of the two different rates charged by the individual team members completing the work to use to project likely costs for purposes of the budget. The work completed individually by the subject matter experts, however, will still be billed at \$235 per hour and any work completed individually by either Mr. Thompson or Mr. Shea will be billed at \$475 per hour.

each police district) earn \$20 per hour, plus a monthly travel allowance of \$25. No Team member will bill for more than eight hours in a day, even if he or she works more hours in a given day, except in extraordinary circumstances and only with prior approval of Team leadership.

C. The Budget for Community Engagement Work

A sizeable portion of the Monitoring Team's budget is devoted to the Team's engagement with the community. The budget allocates \$146,325 for community engagement work, with upwards of 30% of the Team's total budgeted hours devoted to community engagement. This covers the work of Wanda Watts, Miller Roberts and the neighborhood liaisons, community engagement specialist Jessica Drake and the community engagement work of Monitoring Team leaders (Thompson and Ramsey).

Community engagement work covers a lot of ground. The Monitoring Team maintains a website, www.bpdmonitor.com, with regularly updated content, checks and responds to email at info@bpdmonitor.com, responds to telephone calls, and maintains a consistent presence on Facebook (<https://www.facebook.com/bpdmonitor/>) and Twitter (<https://twitter.com/BPDMonitor>), both of which the Team regularly uses to let community members know about the Team's work. Four times a year, as the Consent Decree requires, the Monitoring Team holds community meetings to report on BPD's progress. Additionally, and more importantly, the Monitoring Team meets routinely with community members to inform them about the Consent Decree process and hear from them about their experiences with BPD. These meetings are often with smaller groups, such as community associations or advocacy organizations, or one-on-one. Finally, the neighborhood liaisons that are part of the Monitoring Team proactively engage residents of their communities in order to provide access to the Monitoring Team that is both localized and familiar.

Invoicing

The Monitoring Team prepares an invoice each month for its work. Every invoice contains a breakdown of billable hours worked and expenses incurred, along with any accompanying receipts or documentation. Every invoice also shows the amount of pro bono hours worked and the corresponding savings to the City. The Monitoring Team submits every invoice to the Parties for review. If the Parties have questions or concerns, the Monitoring Team addresses them. The Parties then indicate whether they approve the invoice. When all Parties approve, the Monitoring Team submits the invoice to the Court for review. When the Court approves, it issues an order for payment. Every invoice is thus reviewed and approved by three different entities—the City, DOJ, and the Court—to ensure that the Monitoring Team’s hours and expenses are proper. The Monitoring Team posts every approved invoice to its website for public review. See <https://www.bpdmonitor.com/monthly-statements>.

Conclusion

For the foregoing reasons, the Monitoring Team, with the Parties’ concurrence, requests that the Court approve the proposed budget for Fiscal Year 2024.

A proposed Order is attached.

Respectfully submitted,

/s/

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Exhibit 1

MEMORANDUM

TO: U.S. Department of Justice, City of Baltimore, Baltimore Police Department

FROM: Consent Decree Monitoring Team

DATE: October 25, 2023

RE: Fiscal Year 2024 Monitoring Team Budget

This memorandum details the Monitoring Team's anticipated work during fiscal year 2024 (FY 2024) for purposes of the Monitoring Team's proposed FY 2024 budget. The Monitoring Team continues to shift from providing technical assistance and assessments on policies and training to assessing outcomes and overall compliance with consent decree requirements. The latter is necessarily more labor intensive for the Monitoring Team, and accordingly the FY 2024 budget is larger than in past years.

To offset the increase in assessment work, the Monitoring Team has cut back several regularly scheduled meetings and teleconferences, which has reduced the budget for real-time oversight and technical assistance. Additionally, the Monitoring Team is cautiously optimistic that BPD and the City of Baltimore will come into full and effective compliance within two areas this year (Transportation and Officer Assistance and Support) and may do so with respect to two others (Training and Use of Force) by the end of Fiscal Year 2025. While whether BPD and the City reach compliance depends on the results of the assessments, should compliance be reached, the number of further compliance and outcome assessments will likewise be smaller in future years, reducing the budgets for those years. Moreover, ongoing assessment of those areas in full and effective compliance could be shifted from the Monitoring Team to BPD's audit function, further reducing the budget.

Finally, the Monitoring Team continues to contribute a substantial amount of work *pro bono*. It will continue to do so, and that work is noted below.

I. REAL-TIME OVERSIGHT & TECHNICAL ASSISTANCE

The following are the hours anticipated for real-time oversight and technical assistance by area. As stated above, several regularly scheduled calls and meetings have been cut back, reducing the budget for this area.

	<i>Hours</i>	<i>Budget</i>
Community Policing	80	\$18,800.00
Community Engagement (including Community Liaisons) <ul style="list-style-type: none"> • <i>Community Liaisons: 1,620 Hours, \$35,100</i> • <i>Watts: 215 Hours @ \$235/hour</i> • <i>Roberts: 590 Hours @ \$75/hour</i> • <i>Additional MT Members: 70 hours @ \$235/hour</i> 	2495	\$146,325.00
Stops, Searches, Arrests, and Voluntary Police-Community Interactions	90	\$21,150.00
Impartial Policing	40	\$9,400.00
Crisis Intervention	70	\$16,450.00
Interactions with Youth	35	\$8,225.00
Transportation of Persons in Custody	25	\$5,875.00
First Amendment Protected Activities	30	\$7,050.00
Handling Reports of Sexual Assault	30	\$7,050.00
Technology	75	\$17,625.00
Training	95	\$22,325.00
Supervision - Early Intervention System	85	\$19,975.00
Use of Force	55	\$12,925.00
Misconduct Investigations and Discipline	85	\$19,975.00
Coordination with Baltimore City School Police Force	20	\$4,700.00
Recruitment, Hiring, and Retention	35	\$8,225.00
Staffing, Performance Evaluations, and Promotions	35	\$8,225.00
Officer Assistance and Support	15	\$3,525.00
Sub-Total	3395	\$357,825
<i>Pro Bono</i>	<i>112</i>	<i>\$26,437</i>
TOTAL	3282.50	\$331,388

Unless otherwise indicated, in Part I, the rate reflected is \$235/hour.

II. COMPLIANCE REVIEWS & OUTCOME ASSESSMENTS

The following is a breakdown of the worked required for each planned assessment in FY 2024. Where assessments span either before or after FY 2024, only the portion to be completed in FY 2024 is included below.

A. Assessments Currently Planned Under Sixth-Year Monitoring Plan

1. Arrests

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		75	\$35,625
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> <i>Evan Shea</i> 	\$475/hour	75	\$35,625

The Arrests assessment was substantially completed in the prior budget year. The task that has carried into the current budget year is the completion of the final assessment report, which remains underway.

2. Community Policing & Engagement

	<i>Blended Rate¹</i>	<i>Hours</i>	<i>Budget</i>
Total		160	\$40,200
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> <i>Tyeesha Dixon</i> <i>Chuck Ramsey</i> <i>Jessica Drake</i> <i>Wanda Watts</i> <i>Ken Thompson</i> 	\$275/hour	65	\$17,875
Data Analysis <ul style="list-style-type: none"> <i>Gabriela Wasileski</i> 	\$235/hour	15	\$3,525

¹ A blended rate is used to account for the differing rates of the reviewers.

Real-Time Technical Assistance re: Reviews/Results <ul style="list-style-type: none"> • <i>Tyeesha Dixon</i> • <i>Chuck Ramsey</i> • <i>Jessica Drake</i> 	\$235/hour	15	\$3,525
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Tyeesha Dixon</i> 	\$235/hour	65	\$15,275

The analysis of information and conducting of the assessment began in the prior budget year but continued into the current budget cycle.

3. First Amendment

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		70	\$16,450
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Tyeesha Dixon</i> 	\$235/hour	70	\$16,450

The First Amendment assessment was substantially completed in the prior budget year. The task that has carried into the current budget year is the completion of the final assessment report, which remains underway.

4. Crisis Intervention

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		305	\$82,075
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Jonathan Smith</i> • <i>Randy Dupont</i> • <i>Ken Thompson</i> 	\$275/hour	150	\$41,250
Data Analysis <ul style="list-style-type: none"> • <i>Gabriela Wasileski</i> 	\$235/hour	45	\$10,575

Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Jonathan Smith</i> • <i>Randy Dupont</i> • <i>Evan Shea</i> • <i>Matthew Barge</i> 	\$275/hour	110	\$30,250
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The analysis of information and conducting of the assessment began in the prior budget year but continued into the current budget cycle.

5. Misconduct Investigations & Discipline

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		795	\$215,025
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Hassan Aden</i> • <i>Tyeesha Dixon</i> • <i>Eve Gushes</i> • <i>Chuck Ramsey</i> • <i>Evan Shea</i> • <i>Jonathan Smith</i> • <i>Ken Thompson</i> • <i>Terri Wilfong</i> • <i>Roberto Villaseñor</i> • <i>T. Bowman</i> 	\$275/hour	610	\$167,750
Data Analysis <ul style="list-style-type: none"> • <i>Gabriela Wasileski</i> 	\$235/hour	90	\$21,150
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Matthew Barge</i> • <i>Evan Shea</i> • <i>Jonathan Smith</i> 	\$275/hour	95	\$26,125

Pursuant to the methodology approved by the Parties, the Monitoring Team conducted 244 reviews of misconduct investigations, and 74 reviews of misconduct addressed through the Expedited Resolution process. The number of hours for conducting the assessment reflects 2 hours per misconduct case review, 0.5 hours per Expedited Resolution review, and an additional 85 hours to conduct standalone inquiries into the other areas identified in the approved methodology.

6. Transport

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		145	\$39,075
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Ken Thompson</i> • <i>Evan Shea</i> • <i>Roberto Villaseñor</i> • <i>Hassan Aden</i> • <i>Sean Smoot</i> • <i>Chuck Ramsey</i> • <i>Megan McDonough</i> 	\$275/hour	45	\$12,375
Data Analysis <ul style="list-style-type: none"> • <i>Katie Zafft</i> • <i>Megan McDonough</i> 	\$235/hour	20	\$4,700
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Megan McDonough</i> • <i>Roberto Villaseñor</i> • <i>Evan Shea</i> 	\$275/hour	80	\$22,000

The analysis of information and conducting of the assessment began in the prior budget year but continued into the current budget cycle.

7. Officer Assistance & Support

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		155	\$39,625
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Megan McDonough</i> • <i>Sean Smoot</i> 	\$235/hour	55	\$12,925
Data Analysis <ul style="list-style-type: none"> • <i>Megan McDonough</i> 	\$235/hour	20	\$4,700

Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Megan McDonough</i> • <i>Evan Shea</i> • <i>Matthew Barge</i> • <i>Sean Smoot</i> 	\$275/hour	80	\$22,000
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The analysis of information and conducting of the assessment began in the prior budget year but continued into the current budget cycle.

8. Use of Force (#2)

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		778	\$208,812
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Hassan Aden</i> • <i>Tyeesha Dixon</i> • <i>Eve Gushes</i> • <i>Chuck Ramsey</i> • <i>Evan Shea</i> • <i>Jonathan Smith</i> • <i>Ken Thompson</i> • <i>Terri Wilfong</i> • <i>Roberto Villaseñor</i> • <i>T. Bowman</i> • <i>Nola Joyce</i> • <i>Matthew Barge</i> • <i>Sean Smoot</i> 	\$275/hour	548	\$150,762
Data Analysis <ul style="list-style-type: none"> • <i>Gabriela Wasileski</i> • <i>Matthew Barge</i> 	\$235/hour	80	\$18,800
Real-Time Technical Assistance re: Reviews/Results	\$235/hour	50	\$11,750
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Matthew Barge</i> • <i>Evan Shea</i> 	\$275/hour	100	\$27,500

Pursuant to the methodology approved by the Parties, the Monitoring Team will review 117 Level 1 force incidents, 110 Level 2 force incidents, and 69 Level 3 incidents. The number of hours projected for the review assumes 1 hour per Level 1 incident, 1.75 hours per Level 2 incident, and 2.25 hours per Level 3 incident, with an additional 10% of time budgeted to account for potential case complexity of some Level 2/3 SIRT investigations. Finally, the number of hours also includes an additional 37 hours to address any additional time requirements, including pilot reviews and review administration.

9. Youth

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		522	\$141,039
Finalizing Methodology	\$235/hour	20	\$4,700
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Hassan Aden</i> • <i>Tyeesha Dixon</i> • <i>Eve Gushes</i> • <i>Chuck Ramsey</i> • <i>Evan Shea</i> • <i>Jonathan Smith</i> • <i>Ken Thompson</i> • <i>Terri Wilfong</i> • <i>Roberto Villaseñor</i> • <i>T. Bowman</i> • <i>Nola Joyce</i> 	\$275/hour	372	\$102,389
Data Analysis <ul style="list-style-type: none"> • <i>Gabriela Wasileski</i> • <i>Katie Zafft</i> 	\$235/hour	45	\$10,575
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Tyeesha Dixon</i> • <i>Evan Shea</i> 	\$275/hour	85	\$23,375

Pursuant to the methodology approved by the Parties, the Monitoring Team will review 34 field interviews, 75 custodial detentions, 85 arrests, and 36 uses of force involving youth. The numbers above assume that each field interview will take 1 hour for review, each custodial detention will take 1.5 hours for review, each arrest will take 1.25 hours to review, and each use of force will take 1.75 hours to review. An additional 10% of time is added to account for potential case complexity.

An additional 25 hours is included for review administration and the review and audit of other non-case review elements.

10. Stop, Search, and Arrest

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		480	\$120,400
Finalizing Methodology	\$235/hour	35	\$8,225
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>T. Bowman</i> • <i>Tracey Meares</i> • <i>Evan Shea</i> • <i>Matthew Barge</i> • <i>Ken Thompson</i> • <i>Chuck Ramsey</i> • <i>Hassan Aden</i> • <i>Eve Gushes</i> • <i>Roberto Villaseñor</i> • <i>Sean Smoot</i> 	\$275/hour	100	\$27,500
Data Analysis <ul style="list-style-type: none"> • <i>Data/social science experts TBD</i> • <i>Gabriela Wasileski</i> • <i>Matthew Barge</i> 	\$235/hour	255	\$59,925
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Matthew Barge</i> • <i>Evan Shea</i> 	\$275/hour	90	\$24,750

The Data Analysis hours assume 215 hours necessary for an analysis of BPD stop data, including disparate impact and treatment analyses. An additional 40 hours is included for summary statistics of overall, aggregate data and the analysis and review of Monitoring Team qualitative analyses.

11. Training

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		155	\$41,825
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Christine Cole</i> • <i>Megan McDonough</i> • <i>Matthew Barge</i> • <i>Roberto Villaseñor</i> • <i>Evan Shea</i> 	\$275/hour	60	\$16,500
Data Analysis <ul style="list-style-type: none"> • <i>Katie Zafft</i> 	\$235/hour	20	\$4,700
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Christine Cole</i> • <i>Megan McDonough</i> • <i>Katie Zafft</i> • <i>Matthew Barge</i> • <i>Evan Shea</i> 	\$275/hour	75	\$20,625

The Data Analysis hours assume 215 hours necessary for an analysis of BPD stop data, including disparate impact and treatment analyses. An additional 40 hours is included for summary statistics of overall, aggregate data and the analysis and review of Monitoring Team qualitative analyses.

B. Additional Assessments Contemplated for Seventh-Year Monitoring Plan (Through June 30, 2024)

1. Sexual Assault Investigations (#2)

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		235	\$62,025
Finalizing Methodology	\$235/hour	20	\$4,700
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Nola Joyce</i> • <i>Katie Zafft</i> 	\$275/hour	100	\$27,500
Data Analysis <ul style="list-style-type: none"> • <i>Katie Zafft</i> 	\$235/hour	20	\$4,700

Real-Time Technical Assistance re: Reviews/Results	\$235/hour	25	\$5,875
Report Writing & Editing/Collaboration on Drafts with Parties <ul style="list-style-type: none"> • <i>Katie Zafft</i> • <i>Nola Joyce</i> • <i>Evan Shea</i> 	\$275/hour	70	\$19,250

2. Performance Review Board (#2)

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		90	\$21,150
Finalizing Methodology	\$235/hour	15	\$3,525
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Hassan Aden</i> • <i>Chuck Ramsey</i> • <i>Roberto Villaseñor</i> 	\$235/hour	60	\$14,100
Data Analysis <ul style="list-style-type: none"> • <i>Katie Zafft</i> 	\$235/hour	15	\$3,525

This assessment is not projected to be completed before the end of the budget year. Accordingly, resources necessary to complete a final report are not reflected.

3. Supervision

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Total		145	\$38,075
Finalizing Methodology	\$235/hour	25	\$5,875
Incident/Case/Information Review & Conducting Assessment <ul style="list-style-type: none"> • <i>Ken Thompson</i> • <i>Hassan Aden</i> • <i>Chuck Ramsey</i> • <i>Roberto Villaseñor</i> • <i>T. Bowman</i> • <i>Eve Gushes</i> • <i>Terri Wilfong</i> 	\$275/hour	100	\$27,500
Data Analysis <ul style="list-style-type: none"> • <i>Gabriela Wasileski</i> 	\$235/hour	20	\$4,700

• <i>Katie Zafft</i>			
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This assessment is not projected to be completed before the end of the budget year. Accordingly, resources necessary to complete a final report are not reflected.

C. Sub-Totals for Assessments

	<i>Hours</i>	<i>Budget</i>
Sub-Total	3,966	\$1,101,401
<i>Pro Bono</i>	595	\$163,625
TOTAL	3,371	\$937,776

III. ADDITIONAL REQUIRED RESPONSIBILITIES

	<i>Blended Rate</i>	<i>Hours</i>	<i>Budget</i>
Non-Assessment Report Writing (Monitoring Plans, Biannual Reports, Compliance Reviews)	\$350/hour	190	\$66,500
Court Communications (Quarterly Hearings, Monthly Meetings, Ongoing Updates)	\$325/hour, \$475/hour	328	\$121,600
Project Management & Team Coordination	\$375/hour	140	\$52,500
Sub-Total		658	\$240,600
<i>Pro Bono</i>		98.7	\$36,090
TOTAL		559.3	\$204,510

For Court Communications, the number of hours are computed as the total of:

- 4 Quarterly Public Hearings x 5 Monitoring Team members x 6 hours/Hearing (@ \$325/hour);
- 12 Monthly Meetings x 3 Monitoring Team members x 3 hours/Meeting (@ \$325/hour); and
- 100 hours of communications with the Court (@ \$475/hour).

IV. BUDGET TOTALS

	<i>Hours</i>	<i>Budget</i>
Sub-Total All	8019	\$1,699,826
<i>Sub-Total Pro Bono All</i>	98.7	\$226,152
TOTAL FEES	7217	\$1,473,674
Total Expenses/Costs (Venable + 21CP) (includes travel, website, email, electronic assessment platform, etc.)		\$108,164
TOTAL		\$1,581,838

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES
OF AMERICA,**

Plaintiff,

v.

**BALTIMORE POLICE
DEPARTMENT, et al.,**

Defendants,

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CIVIL NO. JKB-17-0099

ORDER

Upon consideration of the Submission of the Monitoring Team of the Proposed Budget for Fiscal Year 2024 for Approval, and in view of the concurrence of the Parties in that Submission, it is hereby **ORDERED** that the Proposed Budget for Fiscal Year 2024 is approved.

DATED this ____ day of _____, 2023.

BY THE COURT:

James K. Bredar
United States District Judge