

Community Policing as a Counter to Bias in Policing: A Personal Perspective

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Some forty years ago, I was a very young black man living in the Florida panhandle. My dream was to get into law enforcement, but I first needed to get into the state academy, which required the endorsement of a Florida police executive. The chief of the Florida Agricultural and Mechanical University Police Department—a black chief in an historically black college—turned me down. That left Leon County Sheriff Raymond Hamlin, a man whose looks and manner seemed to me to scream *bigot*. A self-styled “redneck,” he was locally famous for once proclaiming to a reporter, “I like my women the same way I like my coffee. White and hot.”

But I was determined, and so I decided to give him the honor of turning me down, too.

I made an appointment and called on him, dressed like the typical college kid of the day—jean jacket, jeans, skullcap. I meant no disrespect. I simply had no idea how to dress for an interview. As it turned out, Sheriff Hamlin was not interested in how I looked. He invited me to sit, and we started talking—for two, maybe three hours. It was a conversation with a man of tremendous common sense—real and respectful. He signed my application to the academy and opened the door to my life’s work.

I learned about the limits of bias that day. I had walked into Sheriff Hamlin’s office bracing to meet a latter-day Bull Connor—the Birmingham, Alabama Commissioner of Public Safety who made himself infamous in the early 1960s for ordering the use of high-pressure fire hoses and police attack dogs against civil rights activists. I encountered instead a human being who listened, believed me to be sincere, and, like most people given the opportunity, did the

right thing. I walked into that office biased, and maybe he was biased, too. Face-to-face, mind-to-mind, character-to-character, we got past it by simply talking to one another.

Some people are overtly biased, and any law enforcement agency that is serious about procedural justice and legitimacy designs its recruitment policies to weed out such people.¹ But my on-the-job experience, as well as academic research, strongly suggests that most bias is implicit²—unpremeditated, unintentional, and, if not unconscious, at least subconscious. As experimental research by Princeton psychologist Susan Fiske has shown, biases are to a degree “hardwired” in our brains. For instance, people subconsciously identify a “person’s apparent race, gender, and age in a matter of milliseconds,” during which “a complex network of stereotypes, emotional prejudices, and behavioral impulses activates.”³ These “knee-jerk reactions,” Fiske emphasizes, “do not require conscious bigotry.”⁴ Fiske cites research by psychologist Elizabeth Phelps in which researchers conduct functional magnetic resonance imaging (fMRI) brain scans of test subjects who are shown pictures of people racially different from them for a fraction of a second.⁵ This exposure—too brief for the subjects to consciously recognize the faces—produced a spike in activity in a part of the brain called the “amygdala, which is involved in feelings of vigilance generally,

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1. See U.S. DEP’T OF JUSTICE & U.S. EQUAL EMP’T OPPORTUNITY COMM’N, DIVERSITY IN LAW ENFORCEMENT: A LITERATURE REVIEW 3-8 (Jan. 2015), http://www.cops.usdoj.gov/pdf/taskforce/Diversity_in_Law_Enforcement_Literature_Review.pdf [http://perma.cc/9AQU-7QPB] (summarizing the literature on best practices for diversity in police departments).
 2. In law enforcement and the courts, unconscious, subconscious, or otherwise unintentional bias is typically termed “implicit bias.” See *Helping Courts Address Implicit Bias: Frequently Asked Questions*, NAT’L CTR. FOR STATE COURTS, <http://www.ncsc.org/~media/Files/PDF/Topics/Gender%20and%20Racial%20Fairness/Implicit%20Bias%20FAQs%20rev.ashx> [http://perma.cc/UKT7-KX8B]. For the incidence of implicit bias, see Sehdhil Mullaianathan, *Racial Bias, Even When We Have Good Intentions*, N.Y. TIMES: THE UPSHOT (Jan. 3, 2015), <http://www.nytimes.com/2015/01/04/upshot/the-measuring-sticks-of-racial-bias.html> [http://perma.cc/UGP6-HFNX] (citing numerous studies on the prevalence of implicit bias); and Jo Handelsman & Natasha Sakraney, *Implicit Bias*, WHITE HOUSE OFFICE OF SCI. & TECH. POLICY 2-3 (Sept. 14, 2015), http://www.whitehouse.gov/sites/default/files/microsites/ostp/bias_9-14-15_final.pdf [http://perma.cc/H5C2-HJ86] (same).
 3. Susan T. Fiske, *Look Twice*, GREATER GOOD (June 1, 2008), http://greatergood.berkeley.edu/article/item/look_twice [http://perma.cc/3UC7-296K]; see also ARE WE BORN RACIST? NEW INSIGHTS FROM NEUROSCIENCE AND POSITIVE PSYCHOLOGY (Jason March, Rodolfo Mendoza-Denton & Jeremy Adam Smith eds., 2010) (discussing the science of prejudice formation).
 4. Fiske, *supra* note 3.
 5. *Id.*

and in the fear response specifically.”⁶ Fiske suggests that the amygdala response has been conditioned “by millennia of tribal warfare and fierce competition for limited resources”—factors that drive us always to look “for cues to help us make snap judgments about others.”⁷

When another team of researchers led by William Cunningham increased the exposure time to 525 milliseconds—just long enough for the brain to process the images consciously and to recognize faces—subjects’ amygdala activity was significantly reduced.⁸ Additional research conducted by psychologist Jaclyn Ronquillo and her colleagues also suggests that apparent bias is less evidence of “hardwired” racial prejudice than evidence of a primal defense mechanism against someone or something unfamiliar—against otherness, as it were.⁹

Moreover, the significance of the effect of longer exposure is worth pondering. Cunningham found that, at an exposure of 525 milliseconds, not only did amygdala activity remain at a normal level, but brain activity increased in areas associated with inhibition and control, indicating that “controlled processes may modulate automatic evaluation.”¹⁰ In Fiske’s words, “[i]t was as if, in less than a second, their brains were reining in unwanted prejudices.”¹¹ Given a few additional milliseconds, the initial subconscious lower-brain impulse becomes available for rapid analysis by the conscious higher brain, which applies to it a certain socially learned response. Amygdala activity associated with fear and violence is soon displaced by upper-brain activity associated with inhibition and self-control.

Those of us who served on the President’s Task Force on 21st Century Policing¹² cited Professor Fiske’s research in our Final Report because we believe it relevant to the source of at least some bias in policing, as well as to means of

6. *Id.*; see also Mo Costandi, *How the Brain Views Race*, NATURE: INT’L WKLY. J. SCI. (June 26, 2012), <http://www.nature.com/news/how-the-brain-views-race-1.10886> [<http://perma.cc/287L-NAEV>] (describing neuroscientific research on processing images of people from different races).

7. Fiske, *supra* note 3.

8. William A. Cunningham et al., *Separable Neural Components in the Processing of Black and White Faces*, 15 PSYCHOL. SCI. 806 (2004).

9. Research conducted by Jaclyn Ronquillo and colleagues showed that, in both white and black test subjects, “dark-skinned [White] targets elicited greater amygdala activity than light-skinned [White] targets.” Jaclyn Ronquillo et al., *The Effects of Skin Tone on Race-Related Amygdala Activity: An fMRI Investigation*, 2 SOC. COGNITIVE & AFFECTIVE NEUROSCI. 39, 39 (2007). Skin tone, not race, may therefore be a factor in exciting amygdala activity. *Id.*

10. Cunningham et al., *supra* note 8, at 806, 811.

11. Fiske, *supra* note 3.

12. See Ron Davis, *What 21st Century Policing Means*, WHITE HOUSE BLOG (Mar. 2, 2015, 4:16 PM), <http://www.whitehouse.gov/blog/2015/03/02/what-21st-century-policing-means> [<http://perma.cc/C4F9-5A4K>].

understanding and reducing such bias.¹³ Indeed, psychologist Joshua Correll has demonstrated that police officers (regardless of race), like community members and student test subjects (also regardless of race), “are faster to ‘shoot’ an armed black man than an armed white man” in a video game, but they are also “faster to avoid shooting an unarmed white man than an unarmed black man.”¹⁴ Shoot/don’t shoot scenarios, whether in real life, in a police academy training exercise, or in a video game, require decision-making on the millisecond level—a time span in which defensive implicit bias seems to compete with more socially conditioned conscious inhibition. To the degree that bias is built into our species’ evolutionary genetic heritage, at least in the form of an apparent defensive response to unfamiliar individuals and situations, we must admit that everyone is biased—even good people.

Fortunately, in most encounters between police and public, there is ample time for the most deeply wired implicit bias to reach consciousness, where it becomes available to the influence of training and past experience. Effective anti-bias “fair and impartial police” (FIP) training¹⁵ can build on socially acquired inhibition to create a level of judgment that may prevent officer actions from escalating a non-violent encounter into violence. FIP training is brief and designed simply to make both command personnel and line officers aware of commonly encountered implicit biases. The training is generally conducted through classroom lecture and discussion. It typically focuses on three areas: understanding human bias, the impact of biased policing on communities as well as on departments, and skills for fair, impartial, and effective policing. The assumption in FIP training is that implicit bias is ultimately the product of insufficient knowledge and a consequent fear of the unknown. The neuroscience and psychology literature cited in this Essay¹⁶ suggests that, absent sufficient knowledge, officers may fall prey to the promptings of the amygdala. The objective of FIP training is to create sufficient awareness of implicit biases so that police personnel are able to replace impulsive decision-making with approaches and procedures based on best law enforcement practices that are designed to

13. THE PRESIDENT’S TASK FORCE ON 21ST CENTURY POLICING, OFFICE OF CMTY. ORIENTED POLICING SERVS., FINAL REPORT OF THE PRESIDENT’S TASK FORCE ON 21ST CENTURY POLICING 10 (2015) [hereinafter FINAL REPORT], http://www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf [<http://perma.cc/N2HW-8UXS>].

14. Fiske, *supra* note 3 (citing Joshua Correll et al., *The Police Officer’s Dilemma: Using Ethnicity to Disambiguate Potentially Threatening Individuals*, 83 J. PERSONALITY & SOC. PSYCHOL. 1314 (2002)).

15. See generally Albert Pearsall et al., *Fair and Impartial Policing* (2011), <http://www.cops.usdoj.gov/pdf/conference/2011/FairandImpartialPolicing-Fridell.pdf> [<http://perma.cc/T39J-UMHM>] (providing an overview of fair and impartial policing and discussing relevant science).

16. See *supra* notes 3, 6, 8, 9, and 14.

promote legitimacy (the public's belief that police ought to be allowed to exercise their authority) and procedural justice (the public's belief that police act fairly and reasonably).¹⁷ Replace the unknown with knowledge, and the likelihood of bias-based action is diminished.

We know we can train officers to recognize and overcome or work around their implicit biases. For instance, an implicitly biased line officer may assume that the presence of two Hispanic males in an all-Caucasian neighborhood indicates a crime in the making, whereas that same officer, having been exposed to FIP training, may withhold action until he or she sees actual crime-relevant evidence. Or, acting on implicit bias, untrained command staff may assume that a planned gathering of African American college students spells trouble ahead, whereas a planned gathering of white students will not be given a second thought.¹⁸

Applying FIP training to millisecond life-or-death decisions presents a serious challenge in that we put officers in the position of second-guessing what is perceived as a matter of self-defense. In the significant minority of situations that require a shoot/don't shoot decision, the lives of the subject, the officer, and quite possibly bystanders depend on a delicate combination of quick reflexes tempered by quick assessment of the threat, as well as socially acquired inhibition. The imperative of self-survival amplifies the impulse to shoot while diminishing the motive to inhibit that impulse. Practice is viewed as the best preparation for making the correct shoot/don't shoot decision. Accordingly, in my personal experience, most police leaders believe that the best tools we have for shoot/don't shoot training are real-world and digital simulations, which allow officers to practice their perceptual skills and decision-making under pressure.

While I agree that simulation is useful for acquiring and sharpening tactical skills, defeating implicit bias in the shoot/don't shoot decision requires more than tactical facility. Even in less urgent scenarios, exposure to scientifically based knowledge is not enough to ensure fair policing. If implicit bias is pro-

17. For a concise discussion of legitimacy and procedural justice, see *Legitimacy and Procedural Justice: A New Element of Police Leadership*, POLICE EXEC. RESEARCH FORUM 9-10 (Craig Fischer ed., Mar. 2014), http://www.policeforum.org/assets/docs/Free_Online_Documents/Leadership/legitimacy%20and%20procedural%20justice%20-%20a%20new%20element%20of%20police%20leadership.pdf [<http://perma.cc/L6K3-MEHS>].

18. These examples are adapted from FAIR & IMPARTIAL POLICING 2 (2015), http://www.fairimpartialpolicing.com/s/Extended_About-FIP_2015-31ku.pdf [<http://perma.cc/7VGY-37ZW>].

duced by fear of the unknown, why not replace the unknown with experience? The best way to do that is through community policing.¹⁹

Community policing emerged in the 1980s with the development of “Broken Windows” theory and became a centerpiece of the Clinton Administration in the 1990s.²⁰ It departed “from the traditional reactive nature of policing” and aspired to be a true “partnership between the police and community stakeholders to prevent crime, identify and arrest offenders, solve neighborhood problems, and improve the quality of life in the community.”²¹ Increasingly, police officers were “expected to engage with residents . . . and become familiar with community concerns.”²² Under a community policing model, mutual understanding between patrol officers or command staff and residents gradually replaces the unknown with the familiar. Officers learn to see residents as people, not as likely threats or potential felons, which in turn fosters empathy.

When President Obama asked me to serve on his Task Force on 21st Century Policing, I was eager to accept because one of the leading Task Force objectives was “to strengthen community policing and trust among law enforcement officers and the communities they serve.”²³ I do not claim credit as one of the early leaders of the community policing movement, but I certainly was present at the birth of the movement, when I served in the early 1980s under Doug Hughes, Major of the Miami-Dade Police Department’s Central Precinct. Hughes believed that instead of indiscriminately treating everyone as an enemy in the challenged neighborhoods that our precinct served, we officers should build relationships, one resident at a time. He was not so naïve as to believe that “a few solid relationships . . . would magically convert adversaries into allies,” but, as I have written elsewhere, “he was convinced that failing to build those relationships would ensure the permanent hardening of dysfunctional, dangerous and destructive relations between police and community.”²⁴

19. *Reducing Biased Policing Through Training*, COMMUNITY POLICING DISPATCH (Feb. 2009), http://cops.usdoj.gov/html/dispatch/February_2009/biased_policing.htm [<http://perma.cc/T64H-UW9K>].

20. See U.S. DEP’T OF JUSTICE, BUREAU OF JUSTICE ASSISTANCE, UNDERSTANDING COMMUNITY POLICING: A FRAMEWORK FOR ACTION 4 (Aug. 1994), <http://www.ncjrs.gov/pdffiles/commp.pdf> [<http://perma.cc/UH6J-CWCG>].

21. OFFICE OF CMTY. ORIENTED POLICING SERVS., HOW TO INCREASE CULTURAL UNDERSTANDING 14 (Caitlin Gokey & Susan Shah eds., 2016) [hereinafter HOW TO INCREASE CULTURAL UNDERSTANDING], http://s3.truandjustice.org/misc/COPS_CulturalUnderstanding.pdf [<http://perma.cc/8FL4-7532>]; see also *id.* at 19-32, 37-46.

22. *Id.* at 14.

23. FINAL REPORT, *supra* note 13, at iii.

24. CEDRIC L. ALEXANDER, THE NEW GUARDIANS: POLICING IN AMERICA’S COMMUNITIES FOR THE 21ST CENTURY 36 (2016).

“Community policing” was not even professional terminology in the early 1980s. Today, it is a widely accepted law enforcement approach. Yet many police leaders persist in simplistically equating community policing with public relations. They regard it as a way to project a positive image of the police within the community. In truth, community policing is as much about officers getting to know the community as it is about the community getting to know the police. It is about transforming stereotypes into people, about humanizing instead of demonizing. Community policing is a powerful means of increasing cultural understanding between police and communities, especially diverse communities. When police act with empathy for the people they serve, both the police and the community reap the benefits. Traditionally, police agencies have had difficulty measuring those benefits, which, for many departments, is the principal obstacle to the adoption of community policing. If a police department cannot readily prove results with numbers, it can be difficult to justify the human resources commitments that community policing requires.²⁵

While not all benefits can be quantified, a relatively new technology, CompStat—short for computer statistics—can be used to make community policing more quantitative. CompStat was developed by the New York Police Department in the 1990s as a means of “mapping” crime hotspots and thereby deploying police resources more effectively.²⁶ Today, CompStat is increasingly being used to extend a policing approach called Community-Oriented Policing and Problem Solving (COPPS) by providing reliable categorical data on the incidence of crime, which can be shared with self-identified interested members of the community.²⁷ In this way, community policing can become more data-driven.

A case in point is the New Haven Police Department, which uses CompStat to engage neighborhood leaders in solving specific problems by sharing data with community leaders and in community meetings.²⁸ When residents see

25. Police Staff, *Does Community Policing Work?*, POLICE MAG. (Dec. 1, 2005), <http://www.policemag.com/channel/patrol/articles/2005/12/does-community-policing-work.aspx> [<http://perma.cc/72JT-KX54>].

26. See, e.g., Raymond Dussault, *Jack Maple: Betting on Intelligence*, GOV'T TECH. (Mar. 31, 1999), <http://www.govtech.com/magazines/gt/Jack-Maple-Betting-on-Intelligence.html> [<http://perma.cc/79SL-AWWG>]; Heather Mac Donald, *Compstat and Its Enemies: A Study Questioning the NYPD's Statistics Is Irredeemably Flawed*, CITY J. (Feb. 17, 2010), <http://www.city-journal.org/html/compstat-and-its-enemies-10697.html> [<http://perma.cc/QC3P-N5V5>].

27. Ken Peak & Emmanuel P. Barthe, *Community Policing and CompStat: Merged, or Mutually Exclusive?*, 76 THE POLICE CHIEF, Dec. 2009, at 72.

28. See HOW TO INCREASE CULTURAL UNDERSTANDING, *supra* note 21, at 47 (quoting a *New Haven Independent* description of CompStat meetings at which police and neighborhood leaders come together to analyze a pattern of dangerous activity and to develop a strategy).

their concerns about crime and the threat of crime validated by objective data, they become more engaged with law enforcement. Given access to the data, they can see how particular problems have or have not been ameliorated by particular patrol and enforcement approaches. By following up with formal and informal community meetings and using social media for feedback, departments can make themselves visibly responsive to community input. Sharing data builds solidarity with the community by increasing transparency. The result has been described as “camaraderie between the cops and community.”²⁹

The absence of such collaboration and camaraderie can have tragic consequences. In August 2014, in my capacity as the new national president of the National Organization of Black Law Enforcement Executives (NOBLE), I traveled to Ferguson, Missouri, to offer Ferguson’s beleaguered law enforcement officials and community leaders NOBLE’s assistance. As I reviewed hours of raw video footage in connection with the shooting of Michael Brown, an unarmed African American, by Darren Wilson, a white officer, and as I studied witness reports of the shooting, one remarkable fact leapt out at me: not one witness to the fatal interaction was able to deliver “the simple declarative sentence, ‘Darren Wilson shot Michael Brown.’”³⁰

Why not? Nobody in the neighborhood knew Officer Wilson by face or by name. He was a uniform, a badge, and a gun—period. For his part, Officer Wilson did not recognize Michael Brown either by name or by sight. Both of these facts are remarkable. At 6’4” and 210 pounds, Brown should have stood out in the Ferguson (population 21,111) neighborhood that Wilson regularly patrolled. And, as one of just fifty-four sworn officers in a small-town department, of whom no more than half were regularly on the streets, Wilson should have been recognized by at least someone.

In Ferguson, around noon on August 9, 2014, Officer Wilson backed up his patrol SUV alongside Brown and Dorian Johnson, who were walking in the middle of the street. Wilson blocked the pair and, instead of addressing them with even a modicum of respect, brusquely ordered them onto the sidewalk. The dynamics of escalation were set. Three minutes later, Michael Brown was dead. I cannot tell you that, had Wilson recognized Brown—something that would have happened if even a rudimentary version of community policing was practiced in Ferguson—he would have handled the interchange differently, but I can reasonably imagine that he would have. I cannot tell you that, had Brown been approached in a respectful manner by an officer he recognized, he would not have acted aggressively toward the officer, but I can imagine Brown would have reciprocated at least some of the respect he was shown. In the end,

29. *Id.*

30. ALEXANDER, *supra* note 24, at 50.

had officer and citizen recognized each other and acted accordingly, I can imagine that Michael Brown would have been alive at 12:03 that afternoon.

As a trained criminal investigator who is also trained as a clinical psychologist, I understand the limitations of anecdotal evidence. But I was present for and part of the early evolution of community policing, and I have seen it in action since the early 1980s. I have also seen the growth of science-based, technology-enhanced, data-driven policing (and have promoted it in the departments I have led). In Ferguson, I saw what can happen when even the rudiments of community policing are absent. To me, the tragedy of Ferguson confirmed the wisdom and effectiveness of the community policing approach as an experience-based counter to the bias from which none of us is fully immune.

The Final Report of the President's Task Force on 21st Century Policing is, in large measure, a document devoted to making the case for community policing.³¹ Having made that case, the Task Force also issued another document, a frankly prescriptive Implementation Guide.³² The response to both the Final Report and the Implementation Guide has been positive from police departments.³³ There has been no vocal opposition to the community policing approach in general or to the specific approaches the Task Force recommended. Some have given the Task Force's recommendations faint to moderate praise, while arguing that "meaningful reform is dependent less upon the establishment of task forces, the development of innovative ideas, and the art of persuasive argumentation than upon legislative and judicial dictates that mandate

31. See FINAL REPORT, *supra* note 13, at iii.

32. THE PRESIDENT'S TASK FORCE ON 21ST CENTURY POLICING, OFFICE OF CMTY. ORIENTED POLICING SERVS., IMPLEMENTATION GUIDE: MOVING FROM RECOMMENDATIONS TO ACTION (2015), http://cops.usdoj.gov/pdf/taskforce/Implementation_Guide.pdf [http://perma.cc/27H5-CYH4].

33. See, e.g., CITY OF COLUMBIA POLICE DEP'T, CITY OF COLUMBIA'S IMPLEMENTATION PLAN: MOVING FROM RECOMMENDATIONS TO ACTION (2015), http://www.columbiapd.net/pdfs/publications/CPD-Community-Based_Plan-Final-12-3-2015.pdf [http://perma.cc/B7DN-YQYN]; MADISON POLICE DEP'T, MADISON POLICE DEPARTMENT: CURRENT STATUS & PLAN FOR 21ST CENTURY POLICING (2016), <http://www.cityofmadison.com/police/documents/21stCenturyPolicing.pdf> [http://perma.cc/RB8U-MFXG]; MASS. CHIEFS OF POLICE ASS'N & MASS. MAJOR CITY CHIEFS, A RESPONSE TO THE FINAL REPORT OF THE PRESIDENT'S TASK FORCE ON 21ST CENTURY POLICING (2015), <http://www.masschiefs.org/files-downloads/news-1/866-mcopa-mmcc-response-to-the-final-report-of-the-president-s-task-force-on-21st-century-police/file> [http://perma.cc/Z8RJ-NGYH]; see also Jerry Abramson, *10 Cities Making Real Progress Since the Launch of the 21st Century Policing Task Force*, WHITE HOUSE BLOG (May 18, 2015, 7:26 PM), <http://www.whitehouse.gov/blog/2015/05/18/10-cities-making-real-progress-launch-21st-century-policing-task-force> [http://perma.cc/37MB-63TA] (describing the ways in which ten cities across America have adopted recommendations of the Task Force).

change.”³⁴ What they believe is required is the legislative and judicial will to create meaningful reform.

My opinion is that implicit bias is a social and neurophysiological issue that is best addressed in police-community relations as they are created through specific police-citizen interactions. For this reason, policing practices need immediate and direct reform, with or without “judicial dictates that mandate change.”

Moreover, since racial bias is not confined to the streets but also enters the courtroom,³⁵ I am convinced that judges, attorneys, and lawmakers can learn much from the policies and practices that police officers and police executives employ in their efforts to understand, overcome, and work around the biases implicit in much that we experience and do. Police officials—especially the line officers in direct daily contact with the public—must act within the law, to be sure, but also in parallel with it. In addition to upholding the Constitution and “going by the book,” they need to act from imagination and empathy to take every opportunity to demonstrate procedural justice and thereby earn the universal perception of legitimacy. A similar exercise of imagination and empathy should govern those who work in the courts. They must ensure that decisions are made both in the letter and the spirit of the law. For, as the community sees us and experiences the impact of our words and actions, we who uphold the law—whether we enforce it in the streets or administer it the courtroom—*we* are the government. We must not, therefore, rely exclusively on our official titles and functions and the statutes from which these derive for the final measure of our authority. Rather, we must perform in ways that clearly demonstrate our membership and stake in the communities we have sworn to serve and protect.

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34. Julian A. Cook, III, *Police Culture in the Twenty-First Century: A Critique of the President’s Task Force’s Final Report*, 91 NOTRE DAME L. REV. ONLINE 106, 114 (2016).

35. For recent documentation, see generally NICOLE GONZALEZ VAN CLEVE, CROOK COUNTY: RACISM AND INJUSTICE IN AMERICA’S LARGEST CRIMINAL COURT (2016).