



CITY MANAGER MEMORANDUM

DATE: August 18, 2025

TO: City Council; Antioch Police Oversight Commission

SUBMITTED BY: Bessie Marie Scott, City Manager

SUBJECT: Status of the United States Department of Justice (USDOJ) Memorandum of Agreement (MOA)

BACKGROUND:

It has come to the attention of city staff that some individuals have publicly claimed that our city is, or might be, out of compliance with the USDOJ Memorandum of Agreement (MOA). As the City Manager, I am happy to take this opportunity to address these concerns and have asked our Consultant on this matter, Manjit Sappal, to formally provide an update on the status of all elements within the MOA. His information is attached hereto for your reference (Attachment A).

The following considerations are also noted for your review and knowledge:

1. The USDOJ agrees with us that the dates outlined in the MOA are not set in stone. As I have stated multiple times, there is a mutual understanding that these dates are meant to guide the City in its reform efforts and should not be used in a way that hinders the work being done. Strict adherence to the dates was never the goal, as we all understood that such a comprehensive agreement would take time to implement operationally for the city. Instead, the focus remains on the ultimate objective: fixing the issues that caused this situation in the first place.

We will move the deadlines forward for the following placeholder areas within the MOA that we knew would need date changes after bringing the consultant on board.

- a. Community Engagement Plan;

- b. The APD Self-Assessment (Currently in progress); and
- c. The APD Language Access Plan.

By advancing the deadlines in these areas and completing many major tasks early, APD is positioning itself for substantial compliance in multiple areas. FYI - The Community Liaison Officer was recently hired in late July.

2. A key responsibility of the Consultant's role is to evaluate whether the City is in compliance with USDOJ's expectations and to either collaborate with us to achieve compliance or report to USDOJ in an effort to compel compliance. Mr. Sappal has been working closely with the City Manager, the Chief of Police, and the City Attorney to ensure compliance and to carefully and accurately report our progress to USDOJ.
3. Since we were able to craft a deal that did not include court oversight, it is important to note that ultimately, it is up to the USDOJ to decide whether they are satisfied with our performance. My understanding is that they are indeed satisfied. Please recognize that the staff team worked tirelessly on these negotiations over the fall and winter, bringing the settlement agreement to the finish line early this year. It took the expertise of city staff, working many hours, to assure the USDOJ that this city could comply without federal oversight. This same expertise currently helps us stay in compliance, as staff intentionally implements the components in the agreement every day.
4. No one besides the USDOJ can take any action regarding our MOA, meaning the agreement does not provide a legal cause of action for anyone to file a formal complaint about our progress. While someone could inform the USDOJ that, in their view, we are out of compliance, the only opinion that truly matters at the end of the day is the USDOJ's.
5. Although CalDOJ is not a party to this agreement, they have been closely monitoring our progress and are well aware of our MOA. In fact, they have met with us and USDOJ while we worked on this settlement. My understanding is that they are not only satisfied but also quite impressed with our progress so far. At their request, I will meet with CalDOJ in person in Oakland on August 22, 2025, as they want to continue understanding how our city has been so successful in quickly and effectively implementing the terms set out in the MOA.

NEXT STEPS:

What we need to move forward and continue complying with our current standards is to proactively engage with the community throughout the city. We will depend on the City Council and the Antioch Police Oversight Commission to support APD and the city in this effort. We require reputable messengers to share the progress we're making and to serve as a feedback loop between the community, APD, and the Consultant. It is more critical

than ever to provide accurate information to the public. We are still involved in active litigation that may lead to the city entering additional agreements. Accordingly, opposing counsel and the public are listening carefully to everything these bodies say and communicate publicly from the dais. **We should promote messages of hope, joy, and progress within our city. It's essential to be clear and transparent when we are doing well and honest about areas where improvement is needed. In this case, we are indeed doing well.** As your City Manager, my goal is to ensure this truth is shared across all channels.

To that end, I suggest that APOC develop a comprehensive Community Engagement Strategy that can serve as a strong bridge between APD and the community, aiming to continue building trust, fostering transparency, and helping shape public safety strategies in collaboration with our residents. I have attached an example here ([Attachment B](#)). We need youth roundtables on policing and public safety, to leverage our Neighborhood Watch groups, and to better understand the issues affecting our ethnic communities here in Antioch. Additionally, our business community and elderly residents must have their voices heard, along with our faith-based and community-based organizations. In this way, we as a city will demonstrate that civilian input is not just symbolic but actively influences outcomes. Furthermore, by showing responsiveness to community concerns, we can strengthen the legitimacy of both the Commission and APD.

I hope you find the attached report helpful, and we look forward to continuing our work in this area to achieve “full and effective” compliance as soon as possible. When we are all on the same page, messaging accurate information to the community, it allows us to celebrate our successes and to highlight our great work. Note that we will present a comprehensive report to the City Council in September, where Mr. Sappal will provide an update on all areas. Please feel free to reach out to us with any questions.

Attachments

- A. Update - DOJ–APD Memorandum of Agreement (MOA) Implementation
- B. Sample APOC Community Engagement Strategy

cc: Joe Vigil, Chief of Police
Derek Cole, Interim City Attorney
Kevin Kunding, Assistant City Attorney
File

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(Delivered via email)

Dear Ms. Scott,

I wanted to provide an update on the current APD status regarding the DOJ–APD Memorandum of Agreement (MOA) implementation, incorporating recent developments from June through August 2025. Chart 1.1 provides the goals, timelines, and project status.

1. Early Completion – The Community Liaison Officer position selection was completed well ahead of the January 3, 2027, deadline, demonstrating proactive progress on a critical community engagement requirement.
2. Policy Review and Development – Policy review is ongoing, focusing on high-priority policies including Use of Force, Bias-Based Policing, and Canine policies, with a November 2025 deadline. The process is methodical, with California DOJ participation and feedback.
3. Training Initiatives – All officers have completed 8 hours of in-person interactive Procedural Justice/Principled Policing training, led by APD Sgt. Price and consultant Shannon Starzyk. The Safe Streets Act component will be added going forward. IADLEST-certified training is being planned for delivery by next quarter, although we are finding it challenging to locate an instructor with this certification.
4. Community Engagement Efforts – APOC subcommittee meetings of the Community Engagement Ad Hoc Committee are underway to shape the Community Engagement Plan. This work is well underway despite original timelines being adjusted to accommodate consultant onboarding. A Community Engagement Plan will be completed and I am working with DOJ to extend the due date, based on the fact that the deadline was based on the start date of the consultant, which occurred several months after the MOA was signed. The same applies to the APD self-assessment and Language Access Plan that will require additional time. US DOJ indicated that extensions would be granted as the consultant started sometime after the agreement was signed and these due dates were based on the hiring of the consultant.

5. Recruitment, Backgrounds, and Promotions – Background investigation protocols will be assessed. Promotional processes for lieutenant and captain ranks have been monitored and recruitment for the Community Liaison Officer was finalized.

6. Data and Analysis – Initial access to APD systems is enabling demographic and complaint data collection. Work is underway to develop protocols for data analysis. Data collection and analysis remain a challenging area.

7. Adjustments to Timelines – Due to the consultant’s contract becoming effective May 28, 2025, several deadlines have been revised to reflect realistic completion schedules. These changes allow us to maintain momentum while ensuring quality implementation. USDOJ is aware and concurs with us that the goal is to provide APD the opportunity to provide the outcomes rather than sacrifice quality to meet dealines.

8. Next Steps:

- Deliver IADLEST-certified training next quarter.
- Complete policy revisions and submit to DOJ.
- Implement community engagement schedule in collaboration with APOC.
- Hire Data and Statistical Policy Analyst.
- Complete Language Access Plan with DOJ consultation.

As it stands, MOA requirements are being met and APD is moving forward without hesitation. We will need to move deadlines forward for the Community Engagement Plan, the APD self-assessment (currently in progress), and the Language Access Plan. By moving key deadlines forward and completing major tasks early, APD is positioning itself for substantial compliance in multiple areas. I have been impressed with the progress and I appreciate the weekly meetings involving you, Chief Vigil, and Mr. Kunderinger to keep APD on track in pursuit of full compliance with the MOA.

Chart 1.1:

This chart summarizes implementation progress under the DOJ-Antioch Police Department Memorandum of Agreement (MOA). It includes concise summaries of all deliverables with corresponding deadlines, actions required, and current status. Progress has been made in numerous areas.

MOA Section	Requirement Summary	Action Required	Deadline	Status
III.A	Identify and agree on a Consultant with DOJ	Hire a qualified law enforcement compliance consultant	4/3/25 - 90 Days of Effective Date	Completed

III.A.2	Develop an implementation schedule	Consultant to create schedule in collaboration with APD, City, DOJ	6/27/25 - 30 Days of Retaining Consultant	Completed
III.B.3.a	Update of policies, directives, and training	APD, Consultant, and APOC to identify and recommend policy changes	11/24/25 - 180 Days of Retaining Consultant	In Progress and proceeding on track
III.B.3.b	Issuance of directives within 180 days of retaining consultant	APD to issue directives post-DOJ approval of policies	5/23/26 - 180 Days of DOJ Approval	Will begin after III.B.3.a is completed
III.B.3.c	Regular and recurring interactive training: within 180 days of retaining consultant	Conduct IADLEST-certified training; new hires within 180 days, veterans every 2 years	5/23/26 - 180 Days of DOJ Approval	Completed department-wide 8 hours training – interactive Principled Policing. Need to add discussion on Safe Streets Act; on track –
III.C.1	Hiring Recruitment Plan within 180 days of retaining consultant	Develop a written Recruitment Plan with Consultant	11/24/25 - 180 Days of Retaining Consultant	In progress
III.C.2	Required background reviews within 180 days	Review and submit procedures to DOJ	11/24/25 - 180 Days of Retaining Consultant	Not yet started
III.C.3	Required to promotional system reviews within 240 days	Review and submit procedures to DOJ	11/24/25 - 180 Days of Retaining Consultant	Not yet started

III.D.1	Review of data collection and analysis protocols: APD	Extract relevant demographic data and analyze or trends	7/2/25 - 180 Days of Effective Date	In Progress
III.E.2.a	Investigations of alleged misconduct: a. APD policy will...	Update Personnel Complaint Policy	7/2/25 - 180 Days of Effective Date	Completed
III.E.2.b	PSB personnel review for proper fit	Review personnel information of unit members	7/2/25 - 180 Days of Effective Date	Completed
III.E.2.c	Develop IA Investigatory procedures with APD and City	Update Personnel Complaint Policy	7/2/25 - 180 Days of Effective Date	Completed
III.E.3.a & b	Maintain tracking of excessive use of force, discriminatory policing, and misconduct investigations/analyze trends	Monitor investigations	NA	Completed
III.E.3.c	Provide copy of complaints/investigation alleging discriminatory policing and use of force to US DOJ w/10 days of completion	Monitor and review investigations	NA	Completed
III.E.3.d	Provide detailed complaint information from III.E.3.c to USDOJ along with outcome of response to complaint/analysis of geography and demographic related data	Monitor and review	7/2/25 - 180 Days of Effective Date	Completed

III.F.1	Create Language Access Plan and post of website after USDOJ approval	Assess progress of requirements	7/2/25 - 180 Days of Effective Date	In Progress
III.G.1	Community Engagement Plan	Submit Community Engagement Plan in consultation with APOC and DOJ CRS	7/2/25 - 180 Days of Effective Date Extended due date to 11/30/25	In progress with APD and APOC
III.G.2.a	Create and staff Community Liaison Officer position	Assign a bilingual officer to this role	1/3/27 - 2 Years of Effective Date	Completed
IV.B.1	Create budget for Compliance Unit and provide to USDOJ	Complete at close of FY	7/2/25 - 180 Days of Effective Date	Completed
IV.B.2	APD to provide a self-assessment		Every 180 Days beginning 180 days after Effective Date – 7/2/25 Extended to 11/30/25	In Progress

Please let me know if you have any questions or concerns.

Sincerely,



Manjit Sappal

Principal - MSINVC

APOC

One-Year Community Engagement Strategy

Goals

- • Build trust between community and police through open dialogue.
- • Increase transparency of policing practices and commission oversight.
- • Elevate community voices to inform public safety policy and priorities.
- • Foster shared responsibility for neighborhood safety.

Quarter 1: Building Awareness & Trust

- • Community Launch Event: Host a town hall introducing the commission, its role, and how residents can get involved.
- • Communications Campaign: Develop plain-language materials (FAQs, social media posts, short videos) explaining oversight.
- • Community Listening Tour: Commissioners attend neighborhood association meetings, faith-based gatherings, and youth forums to hear concerns directly.

Quarter 2: Transparency & Education

- • Public Dashboard Launch: Release an online dashboard with data on use of force, complaints, and stops (updated quarterly).
- • “Know Your Rights & Oversight” Workshops: Partner with local libraries or community centers to explain complaint processes, police policies, and commission powers.
- • Ride-Along/Walk-Along Program: Pair commissioners and community leaders with officers for firsthand observation.

Quarter 3: Co-Creation & Problem-Solving

- • Community Safety Forums (by district): Small-group discussions to identify neighborhood-specific issues (e.g., traffic safety, youth violence prevention).
- • Policy Input Sessions: Gather public input on proposed changes (e.g., body-worn camera policy, complaint review procedures).
- • Youth Advisory Circle: Launch a youth council to advise on public safety issues from a youth perspective.

Quarter 4: Reflection, Reporting & Institutionalization

- • Annual Oversight Report: Publish a plain-language report summarizing data, community input, and commission recommendations.
- • Community Feedback Sessions: Present the report at public meetings and gather feedback on the commission's work.
- • Partnership Agreements: Formalize collaborations with community groups, schools, and service providers for ongoing safety initiatives.
- • Strategic Planning Retreat: Incorporate lessons learned into the next year's engagement plan.

Ongoing Throughout the Year

- • Social Media & Newsletter Updates: Share updates in real time, highlight success stories, and showcase community-police collaboration.
- • Open Public Meetings: Ensure commission meetings are accessible, with time for public comment and plain-language summaries.
- • Commissioner Office Hours: Monthly drop-in sessions for residents to speak directly with commissioners.

Outcome

By the end of the year, the commission will have built visibility, engaged diverse residents, co-created public safety strategies, and demonstrated accountability through reporting.