



Testimony of Katie Townsend on behalf of the
Reporters Committee for Freedom of the Press on the
Metropolitan Police Department's
Body-Worn Camera Program

Submitted to the Council of the District of Columbia
Committee on the Judiciary

May 7, 2015

Chairman McDuffie and Members of the Committee on the Judiciary,

The Reporters Committee for Freedom of the Press appreciates the opportunity to provide testimony concerning the Metropolitan Police Department's ("MPD") body-worn camera ("BWC") program and, specifically, the importance of ensuring that public records created through that program are accessible to the press and the public under the D.C. Freedom of Information Act ("DC FOIA").¹ The Reporters Committee commends the Members of this Committee for devoting their time and attention to this significant issue, which affects all residents of the District of Columbia, and for holding this public hearing.

Founded in 1970, the Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to safeguarding the right to a free and unfettered press guaranteed by the First Amendment. In its more than 40-year history, the Reporters Committee has participated as both a member of the public and a representative of the news media in matters presenting important issues that affect the public's right to be informed about the activities of their government and elected representatives. The Reporters Committee focuses its testimony before this Committee on an aspect of the MPD's BWC program that is of the utmost importance to the press and the public: access to public records created through that program—namely, BWC video—under the DC FOIA.

Use of BWC can be a positive step toward making the MPD more transparent and accountable to the public, and help build trust between police and the community, *only* if the public has access to the records that are created through the use of this technology. Public access to BWC video under the DC FOIA will provide the public with a more

¹ D.C. Code §§ 2-531 *et seq.*

objective record and a greater understanding of law enforcement-civilian interactions, leading both to increased public awareness of police conduct and improvements in police-community relations. Not only are these benefits of transparency the stated goals of the BWC program, they also parallel the purpose of the DC FOIA.²

I. Access to BWC video is vital if the BWC program is to serve its goals of improving government transparency, accountability, and trust between law enforcement and the public.

In response to public concern regarding police officers' compliance with laws and policies that govern their interactions with members of the public, law enforcement agencies across the nation are adopting, or considering the adoption of, body-worn camera technology. The MPD, like other police departments, has faced complaints regarding the conduct of its officers.³ The MPD's use of BWC to create an objective record of officers' interactions with members of the public has the potential to help address a basic problem that can make resolution of such complaints, and public oversight of law enforcement in general, difficult: a lack of information.⁴

Recent events in Oklahoma, where the state's Open Records Act mandates broad public access to BWC video that does not depict a dead body, a nude or underage person,

² See D.C. Code § 2-531.

³ See, e.g., Human Rights Watch, *Capitol Offense: Police Mishandling of Sexual Assault Cases in the District of Columbia* (Jan. 2013), available at <http://www.hrw.org/reports/2013/01/24/capitol-offense-0>; AP, *D.C. Police Chief Addresses Officer Misconduct*, CBS DC (Jan. 26, 2014, 8:09 AM), <http://washington.cbslocal.com/2014/01/26/d-c-police-chief-addresses-officer-misconduct>; Eric Tucker, *DC Police Facing Scrutiny Over Arrested Officers*, NBC WASHINGTON (Jan. 23, 2014, 4:05 PM), <http://www.nbcwashington.com/news/local/DC-Police-Facing-Scrutiny-Over-Arrested-Officers-241708221.html>; Clarence Williams, *D.C. police officer guilty of assault for use of excessive force during 2011 arrest*, WASH. POST (Oct. 16, 2013), http://www.washingtonpost.com/local/crime/dc-police-officer-guilty-of-assault-for-use-of-excessive-force-during-2011-arrest/2013/10/16/f8e08018-369f-11e3-80c6-7e6dd8d22d8f_story.html;

⁴ For example, in 2011 more than a third of the complaints filed against MPD officers were disposed of on the basis of "insufficient facts." Metropolitan Police Department, *Metropolitan Police Department Annual Report 2011*, MPD.DC.GOV 34, available at http://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/publication/attachments/ar_2011_0.pdf.

or, in some cases, the identity of an officer who is under investigation,⁵ are illustrative. Due to public release of BWC video, the citizens of Oklahoma and the rest of the nation were able to see firsthand the shooting of Eric Harris, and received critical insight into the events leading up to that incident, the shooting itself, and the response of other officers who were present at the scene.⁶ The incident has raised serious questions about the training and actions of the reserve officer responsible for shooting Mr. Harris. In a separate incident where a civilian was shot and killed by Oklahoma police, BWC video released to the public showed the civilian pointing a gun at an officer just before he was shot, footage that provided an objective basis for the police department to reassure the community that the use of force in that instance was appropriate.⁷

On numerous occasions, public access to video footage of interactions between police and civilians has promoted accountability. In Denver, for example, a local TV station obtained BWC video—though a public records request—of an arrest that led to an officer’s discipline for use of excessive force.⁸ Contrary to the officer’s statements that he had placed his knee on the suspect’s shoulders, the video showed that his knee had been placed on the suspect’s neck.⁹ BWC video of that incident not only resulted in the suspension of the officer, but its disclosure to the press resulted in important information being disseminated to the public, which facilitated public debate about the propriety of the officer’s actions. In another instance in Ohio, the public release of BWC video led to

⁵ Okla. Stat. tit. 51, § 24A.8(9), *available at* <http://www.oscn.net/applications/oscn/DeliverDocument.asp?CiteID=80295>.

⁶ Don Dahler, *Oklahoma police shooting captured on body camera*, CBS (Apr. 12, 2015, 8:51 PM), <http://www.cbsnews.com/news/oklahoma-police-shooting-captured-on-body-camera>.

⁷ Rhett Morgan, *Sand Springs police release body-cam video of officer fatally shooting armed man*, TULSA WORLD (Apr. 23, 2015, 12:00 AM), http://www.tulsaworld.com/news/local/sands-springs-police-release-body-cam-video-of-fatal-officer/article_afd6bf61-f702-50a8-bd60-147bef04bf70.html.

⁸ Brian Maass, *New DPD Body Cam Video Shows Excessive Force*, CBS DENVER (Mar. 12, 2015, 11:40 PM), <http://denver.cbslocal.com/2015/03/12/new-dpd-body-cam-video-shows-excessive-force>.

⁹ *Id.*

widespread praise of a police officer who did not respond with lethal force to a homicide suspect that charged at him.¹⁰ Because the public was able to see exactly what transpired, the public's trust in that officer, and indeed the police department, undoubtedly increased.

Moreover, public access to BWC video is a necessary component of the public's ability to monitor the efficacy of the BWC program itself. That program has already cost the District of Columbia, for the pilot program stage alone, approximately \$1 million. And under Mayor Bowser's proposed budget for FY 2016, it will cost approximately \$5.1 million more.

In short, it is only when the public has access to BWC video that the stated objectives of the BWC program—increased transparency, accountability, and trust between law enforcement and the community—can be achieved.

II. The MPD is failing to fulfill its promise that the BWC program will lead to greater transparency, and the Mayor's proposal to create a new DC FOIA exemption for BWC video is unwarranted and ill-advised.

When the launch of the MPD's BWC program was first announced, MPD Chief Cathy Lanier assured D.C. residents that the program would “make [the] department more transparent”¹¹ and “establish a record of police conduct.”¹² Indeed, the MPD's current policy requires that BWC video be released to the public under DC FOIA.

Pursuant to Special Order 14-14, “[t]he Director of the FOIA Office shall ensure requests

¹⁰ Jackie Congedo, *Officer: 'I wanted to be absolutely sure before I used deadly force'*, WLWT (Apr. 20, 2015, 11:16 AM), <http://www.wlwt.com/news/officer-i-wanted-to-be-absolutely-sure-before-i-used-deadly-force/32436026>.

¹¹ Mike DeBonis & Victoria St. Martin, *D.C. police will wear body cameras as part of pilot program*, WASH. POST (Sep. 24, 2014), http://www.washingtonpost.com/local/crime/dc-police-will-wear-body-cameras-as-part-of-pilot-program/2014/09/24/405f7f5c-43e7-11e4-b437-1a7368204804_story.html (internal quotations omitted).

¹² Associated Press/NBC4 Washington, *Group of D.C. Police Officers to Begin Testing Body-Worn Cameras*, NBC WASHINGTON (Sep. 24, 2014, 5:47 AM), <http://www.nbcwashington.com/news/local/DC-Chief-to-Discuss-Body-Cameras-for-Officers-276893401.html> (internal quotation omitted).

for BWC recordings and information from the public are received and processed in accordance with GO-SPT-204.05 (Freedom of Information Act Requests).”¹³

The Reporters Committee has made two DC FOIA requests for access to specific categories of BWC video and related records in an effort to evaluate how the program is being implemented and how it is working. The MPD has denied the Reporters Committee’s requests for access to BWC video, stating that it does not have the capacity to redact information from such video that it states is exempt from disclosure under the DC FOIA.¹⁴ To our knowledge, since the MPD’s BWC program was launched in October 2014, not a single BWC video or portion thereof has been released in response to a DC FOIA request. Not only is this inconsistent with DC FOIA and the MPD’s own policy, it is also inconsistent with representations made to the public when the BWC’s pilot program was first announced.¹⁵

Mayor Bowser now seeks to codify the MPD’s refusal to comply with DC FOIA requests for BWC video by amending the DC FOIA. Despite the representation made in her recent State of the District address that “[a]ccountability is embedded, and will be embedded in everything [her] administration does,”¹⁶ Mayor Bowser’s proposed FY 2016

¹³ MPD SO 14-14, available at https://go.mpdconline.com/GO/SO_14_14.pdf, archived at <http://perma.cc/8NEL-CDJ9>.

¹⁴ See Adam Marshall, *D.C. mayor upholds denial of second request for police body camera videos*, RCFP (Apr. 28, 2015), <http://www.rcfp.org/browse-media-law-resources/news/dc-mayor-upholds-denial-second-request-police-body-camera-videos>; *Reporters Committee appeals FOIA denial for video from D.C. police body cams*, RCFP (Nov. 20, 2014), <http://www.rcfp.org/reporters-committee-appeals-foia-denial-video-dc-police-body-cams>.

¹⁵ See Brianne Carter, *D.C. police body camera pilot program slated to begin Oct. 1*, WJLA.COM (Sep. 24, 2014, 5:23 AM), <http://www.wjla.com/articles/2014/09/d-c-police-chief-cathy-lanier-to-discuss-body-cameras-for-officers-107450.html> (providing video of the press conference) (stating that the MPD was “testing to see how long it’s going to take us to be able to [produce BWC videos], and if we need to make some modification to the FOIA process in order to comply”, and that the department would potentially have to add staff in order to ensure that they would be able to meet MPD’s obligations under the DC FOIA).

¹⁶ Muriel Bowser, *State of the District Address*, DC.GOV (Mar. 31, 2015), available at <http://mayor.dc.gov/release/mayor-bowser%E2%80%99s-state-district-address>.

budget included a provision that would exempt all BWC video from disclosure under the DC FOIA.¹⁷ This provision—and any similar proposal—should be rejected. As discussed in more detail below, the DC FOIA already includes all the mechanisms needed to address privacy and law enforcement considerations when it comes to public access to government records, including BWC video. Case-by-case application of the law’s existing provisions to specific requests for access to BWC video—not hurried, categorical exemptions—is the appropriate framework for addressing any privacy or other concerns relating to public access to BWC video. This has long been the favored approach under both federal and DC FOIA, and it should not be abandoned simply because the BWC program employs new technology. Agencies have effectively adapted their public records practices to new technology in the past, and they can do so again.

III. The DC FOIA exempts private information in public records from disclosure.

The primary concern that has been raised about law enforcement use of BWC is its potential impact on the privacy of citizens who are recorded in certain situations. The existing framework of the DC FOIA, however, is more than sufficient to address any privacy concerns presented by public access to BWC footage. For example, one can imagine a police officer’s BWC recording the victim of a crime, a young child, or a hospital patient during the course of the officer’s daily duties. To the extent those recordings reveal “information of a personal nature” about those individuals that, if publicly disclosed, would “constitute a clearly unwarranted invasion of [their] personal

¹⁷ Letter from Jeffrey DeWitt to Phil Mendelson (Apr. 2, 2015), *available at* http://app.cfo.dc.gov/services/fiscal_impact/pdf/spring09/FIS%20-%20Fiscal%20Year%202016%20Budget%20Support%20Act%20of%202015.pdf, *archived at* <http://perma.cc/V3MX-EUBA>.

privacy,” such information would be exempt from disclosure under the DC FOIA.¹⁸

Based on this exemption, BWC could be edited, faces and other identifiers pixelated or blacked out, and voices and other audio modulated or muted, to shield such “information of a personal nature” from public disclosure. This is precisely what happens when other government records that contain exempt information are sought under the DC FOIA.¹⁹

While BWC technology is relatively new, the privacy concerns that may be implicated by the disclosure of BWC video are not; such concerns are comparable to those raised by other government records that contain sensitive information that are subject to the DC FOIA.²⁰ A case-by-case evaluation of individual requests for BWC video, where FOIA officers redact exempt portions of the records where necessary, is the tested and proper approach to addressing privacy concerns while, at the same time, ensuring the public’s ability to access important government records.

IV. The DC FOIA exempts sensitive law enforcement records from public disclosure.

Law enforcement personnel may also harbor concerns that public release of BWC video in response to DC FOIA requests may interfere with an ongoing criminal investigation. Yet, again, the DC FOIA already has provisions specifically designed to address this concern. Section 2-534(a)(3)(A)(i) exempts records compiled for law enforcement purposes to the extent that their disclosure would interfere with enforcement proceedings, and Section 2-534(a)(3)(D) exempts the identity of confidential sources

¹⁸ See D.C. Code Ann. § 2-534(a)(2).

¹⁹ See § 2-534(b) (requiring that “[a]ny reasonably segregable portion of a public record shall be provided to any person requesting the record after deletion of those portions which may be withheld from disclosure”).

²⁰ See, e.g., *Hines v. Board of Parole*, 567 A.2d 909, 913-14 (D.C. 1989) (holding that resentencing reports, academic records, mental health assessments and other records pertaining to prison inmates’ applications for minimum sentence reductions were exempt).

from disclosure. Thus, as with concerns regarding personal privacy, any concern that compliance with the DC FOIA will impede law enforcement activities is misplaced.

V. Current technology allows for effective redaction of exempt portions of BWC video.

The primary basis for the MPD's denial of the Reporters Committee's requests for BWC video is the MPD's assertion that it lacks the capability to redact BWC video.²¹ However, an examination of existing technology, commercial resources, and the MPD's own records makes clear that this is simply not the case.

Widely available, affordable, and efficient video editing software can handle all of the redactions the MPD wishes to make before releasing BWC video in response to a DC FOIA request. Adobe Premiere Pro, a common video editing application that is available for \$19.99/month,²² is one example of readily-available software that permits video footage to be redacted with minimal time and effort. It has features that can semi-automatically track and blur faces and other objects.²³ This makes it easy for even a novice user to efficiently edit and redact video. MPD has already purchased this software, and has provided training to employees on its use.²⁴

²¹ See Adam Marshall, *Reporters Committee seeks review of denied FOIA request for D.C. police body camera video*, RCFP (Apr. 6, 2015), <http://www.rcfp.org/browse-media-law-resources/news/reporters-committee-seeks-review-denied-foia-request-dc-police-body->; *Reporters Committee appeals FOIA denial for video from D.C. police body cams*, RCFP (Nov. 20, 2014), <http://www.rcfp.org/reporters-committee-appeals-foia-denial-video-dc-police-body-cams>.

²² *Adobe Premiere Pro CC*, ADOBE, <http://www.adobe.com/products/premiere.html> (last visited May 6, 2015).

²³ *How to blur a moving face with masking and tracking*, ADOBE, <https://helpx.adobe.com/premiere-pro/how-to/blur-face-masking-tracking.html> (last visited May 6, 2015).

²⁴ Marshall, *D.C. mayor upholds denial of second request for police body camera videos*, *supra* note 14.

In addition, at least one of the companies that manufactures BWC used by the MPD²⁵ provides software that specifically integrates with video editing tools in order to accomplish redactions.²⁶ Wolfcom USA's webpage states that they

support customers who export a copy of the video out of the software and then use Adobe Premier or Avid to edit/enhance or blur/pixelate video as needed. At that point, they can re-ingest the video back into the software and have the original and the edited version with continuity intact.²⁷

D.C. government agencies, including the MPD, have a responsibility to ensure that the private companies they contract with are providing technology that enables them to comply with their public records obligations. This is especially true given the many millions of taxpayer dollars that has been and will be spent on BWC.²⁸

Alternatively, MPD could contract with an external vendor to process BWC video and perform redactions in compliance with DC FOIA. Bridge Media Group, a Florida-based company, provides video redaction services for police departments in several states.²⁹ In response to a request for information from the Reporters Committee, a representative of Bridge Media Group estimated that it would take less than 3.75 hours to review and redact one hour of BWC video at a cost of approximately \$200. This estimate is based on the recommendations of a BWC working group set up by Baltimore Mayor Rawlings-Blake, which, in turn, drew from the experience of other police forces and

²⁵ MPD SO 14-14, *supra* note 13.

²⁶ *Wolfcom Management Software with GPS*, WOLFCOM, http://www.wolfcomusa.com/police_camera_management_software/police%20camera%20backend.html (last visited May 6, 2015).

²⁷ *Id.*

²⁸ Letter from Jeff DeWitt to Mayor Vincent Gray (Aug. 15, 2014), *available at* http://mpdc.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/14-EC3_3rd%20Qtr%20Emergency%20and%20Contingency%20Cash%20Reserves%20-%20June%2030,%202014_Sent%208-25-14.pdf; FY 2016 Proposed Budget and Financial Plan, Vol. 2, Agency Budget Chapters—Part I, OFF. OF THE CHIEF FIN. OFFICER, *available at* http://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/2016_DCBudget_V2_Opt.pdf.

²⁹ *Services*, BRIDGE MEDIA GROUP, LLC, <http://www.bridgemediagroupllc.com/services.html> (last visited May 6, 2015).

professional video editors.³⁰ The availability of efficient and affordable services like this one demonstrate that Chief Lanier's recent assertions about the MPD's inability to redact BWC video in a cost-effective, efficient manner are groundless.³¹

Notably, the MPD has already contracted with an outside vendor to effectively redact BWC video to protect the privacy of individual citizens before releasing such video to the public.³² On December 8, 2014, the MPD uploaded a redacted BWC video to its YouTube channel from a "real-life traffic stop" that occurred on November 3, 2014.³³ The video is thoroughly redacted to obscure, among other things, the face of the person that was stopped, her identifying documents, the license plate of the stopped vehicle and other vehicles passing by, the officer's computer screen, and certain audio segments.³⁴ Another video uploaded by the MPD on December 8, 2014, is a more than nine minute BWC video from a traffic stop on November 27, 2014.³⁵ This video has also been redacted to obscure objects such as the officer's patrol car computer, the stopped person's face and personal documents, a bystander's face, and certain audio.³⁶ These two videos demonstrate that the MPD can effectively address any privacy concerns that may be implicated by the public disclosure BWC video in response to DC FOIA requests.

³⁰ *Mayor Rawlings-Blake's Working Group on the Use and Implementation of Body-Worn Cameras: Draft Recommendations* 31 (Feb. 18, 2015), available at <http://mayor.baltimorecity.gov/sites/default/files/20150218BWCWorkingGroupRecommendations.pdf>, archived at <http://perma.cc/2PV2-KLUL>.

³¹ See Cathy Lanier, *Body Worn Camera Fact Sheet*, YAHOO (Apr. 29, 2015), <https://groups.yahoo.com/neo/groups/MPD-4D/conversations/messages/25901> (asserting that using beta software being developed in Seattle it would take 4.25 hours to redact one minute of BWC video).

³² Marshall, *D.C. mayor upholds denial of second request for police body camera videos*, *supra* note 14.

³³ See *MPD and Body-Worn Cameras*, MPD.DC.GOV, <http://mpdc.dc.gov/bwc> (last visited May 6, 2015); see also DC Metropolitan Police Department, *BWC – Traffic Stop 1 (11/3/14)*, YOUTUBE (Dec. 8, 2014), https://www.youtube.com/watch?v=6V_sGqXoSo8. The video description suggests that it was captured by an AXON Flex BWC. These videos are on file with the Reporters Committee and can be provided in the event that they are removed from the MPD's YouTube page.

³⁴ See *supra* note 35.

³⁵ DC Metropolitan Police Department, *BWC – Traffic Stop 2 (11/27/14)*, YOUTUBE (Dec. 8, 2014), <https://www.youtube.com/watch?v=0vrUH-QP5mI>.

³⁶ See *id.*

VI. Compliance with the DC FOIA will not impose excessive administrative burdens on MPD.

Questions have been raised by the Mayor's office,³⁷ and echoed by Chief Lanier,³⁸ about the administrative burden of complying with DC FOIA requests for BWC video. These concerns are misplaced. The vast majority of requests for BWC video are likely to involve a specific incident. For example, when there has been a questionable use of force, a reporter might ask for BWC video relating to that incident. Based on current estimates provided by both the Baltimore BWC working group and a commercial video redaction entity,³⁹ a request of 15 minutes of BWC video would take less than an hour to review and redact, at a cost of approximately \$50.

Where a request that "reasonably" describes the BWC video requested, as required by the DC FOIA, is submitted, the MPD has 15 business days to release responsive, non-exempt records, subject to a ten business day extension in complex cases, for a total of up to 25 business days—more than a calendar month—for complex requests.⁴⁰ Given the technology that is currently available to streamline the redaction process and the availability of commercial redaction services, this is more than ample time for MPD to comply with DC FOIA requests for BWC video.

To the extent that the MPD anticipates an increased number of requests for BWC video and/or generally lacks resources to comply with its obligations under the DC FOIA,

³⁷ See Paul Wagner, *Bowser administration wants to keep police body camera footage exempt from FOIA requests*, FOXDC (Apr. 13, 2015, 6:07 PM), <http://www.myfoxdc.com/story/28791922/bowser-administration-body-camera-footage-exempt-foia-requests>.

³⁸ Cathy Lanier, *supra* note 31.

³⁹ *Supra* notes 29-30.

⁴⁰ D.C. Code §§ 2-532(c), 2-532(d).

it may be prudent for the MPD to work with an outside specialist, or hire additional staff to process records requests. Mayor Bowser has requested \$5,063,702 for FY 2016 to expand the use of BWC, for the stated purpose of providing “more accountability and transparency and for documentation purposes.”⁴¹ Surely a small part of this sum could be used to facilitate efficient processing of DC FOIA requests for BWC video by the MPD, which would ensure that the stated goals of the BWC program—including transparency of law enforcement activities—is being met. Additionally, the MPD is authorized to collect reasonable fees related to searches for and redactions of BWC video from certain requesters.⁴²

VII. An alternative public access framework for BWC video should be rejected.

Recently, MPD Chief Lanier stated that the general public should only be provided with BWC video by the MPD in “matters of great public interest.”⁴³ Presumably, Chief Lanier anticipates that whether or not a matter is “of great public interest” will be determined by the MPD. Such a regime would essentially allow the MPD to release video whenever it wishes, while simultaneously ignoring public requests for access.⁴⁴

Concerns over the selective release of BWC video by law enforcement agencies were recently articulated by the Police Executive Research Forum (PERF), which stated that any exemptions to public release of BWC video should be applied carefully “to avoid any suspicion by community members that police are withholding video footage to hide

⁴¹ FY 2016 Proposed Budget and Financial Plan, *supra* note 28.

⁴² D.C. Code Ann. § 2-532(b).

⁴³ Cathy Lanier, *supra* note 26.

⁴⁴ *See id.* (stating that under the MPD’s plan local and federal prosecutors would be the only group to have “[u]nrestricted access to all videos with no redactions”).

officer misconduct or mistakes.”⁴⁵ It is difficult to see how the stated goals of the BWC program—increased transparency, accountability, and community trust—will be furthered if MPD routinely withholds *all* BWC video from the public, but selectively releases certain BWC video at its discretion. Ensuring that the press and the public can obtain access to BWC video—appropriately redacted, when necessary, to address applicable exemptions—under DC FOIA is the clearest and most effective means of furthering the goals of the BWC program.

VIII. Conclusion

As police departments around the country adopt body camera policies and programs, our nation’s capital can and should serve as a model of transparency and accountability by fully complying with its public records law. If the MPD requires assistance with identifying the best and most efficient technological solutions for redacting BWC video and making it available to the press and the public in response to DC FOIA requests, the Reporters Committee and other members of the community are more than willing to work with it and city officials to accomplish those objectives. The MPD, the Mayor, and the Council should work with the community to ensure that the BWC program serves the citizens of the District of Columbia.

⁴⁵ Police Executive Research Forum, *PERF and COPS Office to Release Report On Body-Worn Cameras*, 28 SUBJECT TO DEBATE 4 (July/Aug. 2014), *available at* http://www.policeforum.org/assets/docs/Subject_to_Debate/Debate2014/debate_2014_julaug.pdf.