

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO.: 1:15-cv-01046
)	
Plaintiff,)	JUDGE: SOLOMON OLIVER, JR.
)	
v.)	
)	
CITY OF CLEVELAND,)	
)	
Defendant.)	

**JOINT MOTION REGARDING RESTRUCTURING OF MONITORING TEAM AND
APPOINTMENT OF HASSAN ADEN AS INDEPENDENT MONITOR**

The City of Cleveland and the United States of America (collectively “the Parties”) jointly and respectfully request that this Court enter an Order approving the restructuring of the Monitoring Team and appoint Hassan Aden, current Deputy Monitor, as the Independent Monitor (“Monitor”). Matthew Barge, the current Monitor, would transition to a subject matter expert on the Monitoring Team.

DISCUSSION

Pursuant to Paragraph 353 of the Settlement Agreement, on October 1, 2015, the Court approved the Parties’ joint selection of the Police Assessment Resource Center (PARC) to serve as the Monitor for the Agreement. The Monitor is charged with assessing and reporting on whether the requirements of the Settlement Agreement have been implemented, and whether implementation is resulting in constitutional and effective policing, professional treatment of individuals, and increased community trust of the Cleveland Division of Police. *See* Settlement

Agreement, ¶ 350. The PARC team consisted of Matthew Barge as the lead monitor, and included a team with expertise in law enforcement, court monitoring, relevant legal standards, criminology, and community outreach and engagement, among other things. In late 2017, Mr. Barge promoted Hassan Aden, former chief of the Greenville, North Carolina, Police Department, to Deputy Monitor. Mr. Barge resigned from PARC in June 2018, and in August 2018, the Court issued an Order appointing Mr. Barge as the Independent Monitor, and Mr. Barge's team remained in place.

In June 2019, Mr. Barge notified the Parties that although he could continue to play a role on the Monitoring Team, he would be unable to continue in his duties as lead monitor due to his changing personal commitments. After speaking with Mr. Barge and other members of the Monitoring Team, considering whether the Parties should seek a new Monitor from outside the current monitoring team, and interviewing Mr. Aden, the Parties recommend that Hassan Aden, who has served as Deputy Monitor since late 2017, be designated as the Monitor, while Mr. Barge continues to work with the Monitoring Team as a subject matter expert.

Chief Aden is widely recognized as a thought leader in law enforcement, particularly in the areas of crime prevention and community inclusion. After serving 25 years with the Alexandria Police Department (APD), where he was made a member of the Center for Evidence-Based Crime Policy's hall of fame in recognition of his innovative field experiments transforming APD's patrol sector, he served as Chief of Police of the Greenville, North Carolina, Police Department from 2012 to 2015, where he is known for his inclusion of community and business leaders in his strategic planning process. He currently serves as an executive board member for Law Enforcement Leaders to Reduce Crime and Incarceration. He has previously served as an executive fellow for the National Police Foundation and as senior advisor on

policing to the Vera Institute of Justice. He is the co-author of multiple law enforcement resources, including “Maintaining First Amendment Rights and Public Safety in North Minneapolis,” a comprehensive assessment published by the U.S. Department of Justice’s Office of Community Oriented Policing Services. He holds a Master of Public Administration from American University and was formerly an adjunct professor at East Carolina University. Chief Aden is, in short, well-qualified to serve as Monitor of the Settlement Agreement, and his credentials are set out in further detail in the attached resume. (Attachment A.)

To further ensure continuity, Matthew Barge will continue to play a critical role as a subject matter expert on the Monitoring Team, and will serve as a resource to Chief Aden and the Monitoring Team.

The Parties and the Monitoring Team recognize the critical role that the Cleveland community plays in successfully implementing the changes required by the Settlement Agreement. **To ensure that the public is well-informed of the change in leadership within the Monitoring Team, the Monitoring Team will host several events in the next few weeks to introduce the new Independent Monitor.** The Parties and the Monitoring Team welcome the public’s input on the progress made to date and community members’ priorities as the reform process mandated by the Settlement Agreement continues.

CONCLUSION

For the foregoing reasons, the Parties respectfully request that the Court enter an order appointing Hassan Aden as Independent Monitor pursuant to Paragraph 353 of the Settlement Agreement and restructuring the Monitoring Team as described above. Chief Aden is well-poised to handle the responsibilities of Monitor, given his expertise on law enforcement matters, his unwavering commitment to constitutional policing, and his involvement in nearly every

aspect of this case as Deputy Monitor. His promotion to lead monitor will provide the community with assurances that the Settlement Agreement is being monitored effectively, and ensure the continuity of leadership and guidance that the current Monitoring Team has provided the Parties since 2015.

This, the 17th day of July, 2019.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney
Northern District of Ohio

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July 2019, a copy of the foregoing Joint Motion Regarding Restructuring of Monitoring Team and Appointing Hassan Aden as Independent Monitor was filed electronically. Notice of this filing will be served upon all parties by operation of the Court's electronic filing system.

s/Michelle Heyer
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CAREER BRIEF

Hassan Aden is a seasoned administrator with extensive experience leading and managing organizations. A skilled “Change Agent,” Aden has experience in developing and implementing comprehensive Change Management Plans. I have a strong history of internal and external collaboration with stakeholders in the development and implementation of public policy and programs, as well as strong verbal and written communications skills accompanied by an excellent analytical capacity. I am a multilingual - Italian (fluent) and Spanish (conversational) - speaker.

PROFESSIONAL BACKGROUND

October 2017-present
Consultant/Deputy Monitor
21st Century Policing, LLC
Chicago, Illinois

I serve as the deputy monitor for the Baltimore Consent Decree monitoring team. I manage projects of the Baltimore Monitoring Team to ensure that required assessments, interviews, updates and court documents are completed on time and are of high quality. I serve as one of the primary liaisons between the monitoring team, the United States Department of Justice, the City of Baltimore and the Baltimore Police Department. I keep the Court appointed Monitor up to date on upcoming deadlines and priorities while coordinating, reviewing and submitting the work of the monitoring team.

April 2016-present
Deputy Monitor
Forward PLLC
New York, NY

I serve as primary liaison between the monitoring team, the United States Department of Justice, the Seattle and Cleveland Police Departments, and the Cities of Seattle and Cleveland staff and elected officials. I keep the Court appointed Monitors up to date on upcoming deadlines and priorities while coordinating, reviewing and submitting the work of the monitoring teams.

GOVERNMENT
ATTACHMENT

A

February 2016 – present

Founder

The Aden Group, LLC

Washington, DC

My firm provides consultancy to multiple national and international organizations-our services are aimed at optimizing the continuous improvement of public safety organizations' performance and strategic focus. Services offered include, comprehensive policy and management studies, disaster planning, to include mass casualty events, recruitment strategies, executive searches, mentoring and executive development, strategic planning, accreditation preparation assistance (CALEA) and promotional assessment centers for all levels/ranks. We provide strategic guidance to departments in assessing their performance against the President's Task Force on 21st Century Policing recommendations and policy positions.

February 2016 – January 2018

Senior Adviser

Vera Institute of Justice

New York, NY

I provided oversight and leadership on local, state, and federal law enforcement related projects. Worked with senior Vera leadership to develop and implement strategies designed to improve how policing interacts and serves vulnerable populations through concepts and methodologies derived from the 21st Century Policing Task Force. Research and develop funding strategies, as well as provided guidance to Vera staff on projects and proposal development across the portfolios. Guided project management methodologies and strategies. Supervise and/or write papers and collaborate on grant proposals.

February 2016- January 2018

Senior Adviser

The Police Foundation

Washington, D.C.

I served as the senior adviser to the President and senior executive team on all local, state, and federal law enforcement initiatives and related projects. I advised Police Foundation executives and staff on funding strategies, as well as provided direction and oversight on projects and proposal development. Guided project management methodologies and strategies. Represent the Police Foundation at meetings and conferences.

January 2015- February 2016

Director

International Association of Chiefs of Police (IACP)

Alexandria, VA

Served as the director of the Research and Programs Directorate of the International Association of Chiefs of Police and oversee a large portfolio of operational programs and research projects aimed at advancing professional police services, promoting enhanced administrative, technical, and operational police practices. Served on numerous advisory groups within the U.S. D.O.J. whose missions vary from policy development and law enforcement forecasting to grant funding. I developed and implemented two first of their kind organizations; the first is the IACP Center for Police Research and Policy, which in its first three-year phase, is designed to conduct three Randomized Controlled Trials as well as translate existing empirical research into a usable format for the profession. The second is the Institute for Community and Police Relations, which will serve as the front of mind organization for police departments who are assessing their current relationships with their stakeholders and looking for evidence-based approaches for addressing gaps in their relationships with the communities they serve. Both entities are aligned with the President's 21st Century Policing Task Force recommendations. Our work fosters cooperation and the exchange of information and experience among police leaders and police organizations of recognized professional and technical standing throughout the world.

November 2012- January 2015

Chief of Police

Greenville Police Department

Greenville, North Carolina

I was appointed Chief of Police on November 26, 2012. The City of Greenville has a static population of 95,000 residents and is geographically comprised of 35 square miles. The Greenville Police Department is nationally accredited through the Commission on Accreditation for Law Enforcement Agencies and has an authorized strength of 250 sworn and non-sworn employees. The Department had an annual budget of \$22 Million. The Greenville Police Department has been reorganized to facilitate the implementation of a community oriented policing philosophy with a strong emphasis on geographic accountability and effective problem-oriented policing tactics. During my administration significant reform occurred in the Greenville Police Department. Policies, practices, and training strategies were realigned to meet the needs of our internal and external stakeholders. The training we implemented across the organization focused on procedural justice, realignment of performance measures and community engagement, specifically in the area of building trust. The changes we implemented, and the derived positive results, were noticed on the national level as best practices. Post-Ferguson I was selected to be on the U.S. D.O.J. Collaborative Reform Initiative team that assessed the St. Louis County Police Department and its actions immediately following the Ferguson Police Department shooting of Michael Brown.

August 1987- November 2012

Deputy Chief of Police- Patrol Operations Bureau

Alexandria Police Department

Alexandria, VA

Commanding officer of police operations - Dedicated staff of 200 sworn and non-sworn employees providing service to city of 148,000. Served as Acting Chief of Police when called upon in the Chief's absence. Managed \$22 Million Patrol Operations Bureau budget. Assisted the Chief of Police in the development of the department's \$52 Million annual budget/ Worked with staff to develop and implement the Patrol Operations Bureau Strategic Plan and Mission and Vision statements. Led Patrol Operations Bureau COMPSTAT crime control strategies and problem-solving activities. 2011 Part One Crime rates are at historic 1965 levels. Served on the City Manager's Ethics Committee to address Citywide needs for training and accountability. Collaborated with employee groups to mutually resolve organizational issues. Taught the "Leadership Principles" course at the Alexandria Leadership and Management Institute. Managed research related partnerships for the department.

Police Captain- Commander of Patrol Sector Three

Commanding officer of the largest police district in the City. Built a highly functioning, effective and diverse team of officers responsible for affecting a tremendous turnaround in crime and public order issues in our sector. Facilitated the planning of strategic and tactical responses that have resulted in major reductions in crime, 43-year lows, as well as a demonstrable rise in the quality of life in our sector. Commanding officer of the Police Department's Defensive Tactics Training Unit. \$5.2 Million budget for sector expenditures.

Police Captain-Aide to the Mayor and City Council

Managed the Department's correspondence with the Mayor and members of City Council. Served as the Department's Freedom of Information Act (FOIA) officer. Provided counsel to the City's political leadership regarding police and related public policy matters. Collaborated with City Department heads to mitigate constituents' issues and concerns involving multiple City agencies. Commanded the Police Department's Field Training Unit responsible for preparing Police Academy graduates for their patrol duties and ensuring compliance with training standards.

Police Captain- Special Assistant to Chief of Police

Provided counsel and research services to the Chief of Police regarding public policy matters, strategic planning and internal investigations case review. Responsible for planning, developing and implementing programs as directed by the Chief of Police. Provided expertise in the area of COMPSTAT program development and assisted in developing the infrastructure for what later became the Strategic Response System (SRS).

Police Captain- National Institute of Justice

Served as a practitioner subject matter expert in the field of interoperable communications. Provided analysis and solutions regarding radio and data interoperability problems to police departments throughout the United States and Canada.

EDUCATION

2009 Master of Public Administration
American University School of Public Affairs; Washington, DC
GPA 3.86; Golden Key National Honor Society; Pi Alpha Alpha National Honor Society
2008 Master Certificate – Public Administration
American University; Washington, DC
GPA 3.9

PROFESSIONAL / LEADERSHIP TRAINING

2007 Boston University; Boston, MA
Police Executive Research Forum/Senior Management Institute for Police

2006 University of Richmond, Robins Business School; Richmond, VA
Professional Executive Leadership School

2003 to 2005
Leadership Institute City of Alexandria (LICA); Alexandria, VA
Leadership and Responsible Public Administration Studies

PROFESSIONAL ASSOCIATIONS AND MEMBERSHIPS

Commission on Accreditation for Law Enforcement Agencies (CALEA). Former commissioner on the governing board of CALEA. Currently continue to advise the Board on current issues in the policing field.

International Association of Chiefs of Police (IACP)

Police Executive Research Forum (PERF)

The National Academies of Sciences, Engineering and Medicine
Serve on the Committee on Proactive Policing to inform on national research priorities related to law and justice.

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Plaintiff,)	JUDGE: SOLOMON OLIVER, JR.
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**PROPOSED ORDER REGARDING RESTRUCTURING OF MONITORING TEAM
AND APPOINTMENT OF HASSAN ADEN AS INDEPENDENT MONITOR**

Currently pending before the court in the above-captioned case is the City of Cleveland’s and the United States of America’s (collectively “the Parties”) Joint Motion Regarding Restructuring of the Monitoring Team and Appointment of Hassan Aden as Independent Monitor. The Parties request that Mr. Aden replace Matthew Barge as Independent Monitor of the Settlement Agreement while Mr. Barge takes on a role as a subject matter expert on the team.

On October 1, 2015, the court approved the Parties’ joint request to appoint PARC to serve as the Independent Monitor of the Settlement Agreement, with Matthew Barge identified as the lead Monitor for the PARC team. On June 28, 2018, Mr. Barge notified the Parties that he had resigned from his position as Vice President and Deputy Director of PARC, and in August 2018, the court approved Mr. Barge as the Independent Monitor of the Settlement Agreement. In June 2019, Mr. Barge notified the Parties that, due to his changing personal commitments, he was no longer able to serve as the Independent Monitor. The Parties recommend that Mr. Aden,

currently Deputy Monitor of the Settlement Agreement, replace Mr. Barge as Monitor, and that Mr. Barge be permitted to play a role as a subject matter expert on the team.

The court finds that Mr. Aden is well-qualified to serve as Monitor. In addition, Mr. Aden's appointment assures continuity and lessens the possibility that momentum will be lost as a result of the transition. The court therefore hereby approves the Parties' Joint Motion Regarding Restructuring of the Monitoring Team and Appointment of Hassan Aden as Independent Monitor pursuant to Paragraph 353 of the Settlement Agreement.

It is SO ORDERED this _____ day of _____, 2019.

Honorable Solomon Oliver, Jr.
United States District Court Judge