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Ken Barone, Project Manager
Connecticut Racial Profiling Prohibition Project
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Central Connecticut State University
1615 Stanley Street
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Dear Mr. Barone,

I have expressed this before and I still have a problem with the title of this Project. By definition (see below,) the data provided to you from all the police departments cannot be "Racial Profiling" because a reason other than race is specified as the reason for the stop. Bias Policing Prohibition Project would be a much better name. It might have less media impact but it is more appropriate.

Connecticut "Racial Profiling" Defined and Banned:

The law prohibits the State Police, municipal police departments, and other law enforcement agencies from engaging in racial profiling, which is defined as "the detention, interdiction, or other disparate treatment of an individual solely on the basis of the racial or ethnic status of such individual" (CGS § 54-11). It bars police from using a person's race or ethnicity as the sole factor (1) in determining probable cause to arrest or take someone into custody or (2) "constituting a reasonable and articulable suspicion that an offense has been or is being committed so as to justify the detention of an individual or the investigatory stop of a motor vehicle." And, individual detention based on noncriminal factors is considered to be inconsistent with the racial profiling ban (CGS § 54-11).

I have a problem with some of your statements throughout this analysis and have listed them below:

Page 1, paragraph 2: “The results were robust to the inclusion of a variety of controls and sample restriction that excluded equipment violations.”

Why exclude anything?

Page 1, paragraph 2: “The post-stop analysis did not produce statistically significant estimates possibly because of an insufficient sample of minority searches.”

So in this section minorities were not searched? Wouldn't that be a good thing? A lot of Wethersfield census tract data and calculations yet 82% of stops were not Wethersfield residents. Why did this report put so much detail into data tracts? With 82% of nonresident stops, the town's data tracts mean little.

Also, with the tracts being so small, who is to say when the violation was actually seen or documented, on the line, just over etc, a waste of time in my opinion.

Page 21, paragraph 4: “While white drivers were stopped more frequently than black or Hispanic drivers for more hazardous driving violations as a percentage of their total stops, black and Hispanic drivers were stopped more frequently for equipment-related violations than white drivers as a percentage of their total stops.

This is the heart of the IMRP analysis, stop making equipment violation stops and this will lower the police department's high minority stop rate. If the IMRP want the police to stop doing their job then they should help facilitate a change in the law.

Page 14, paragraph 3: “In Wethersfield, 437 of the stops made resulted in the issuance of a misdemeanor summons (9.7%.) Black drivers were almost twice as likely and Hispanic drivers were almost three times as likely to receive a misdemeanor summons compared to white drivers (11% of Black drivers and 16% of Hispanic drivers compared to 6% of White drivers.)”

This statement does nothing to describe why a summons was given. No one should be given a warning for No insurance, suspensions, DWI, so all summonses are legitimate. This is just an inflammatory statement.

Page 20, paragraph 4: “The non-resident component of the stop demographics appeared to have its greatest impact in the Route 5 and Route 99 corridors, with 94% of the drivers stopped on Route 5 and 83% of the drivers stopped on Route 99 not living in Wethersfield. These two corridors were responsible for 72% of the non-resident Hispanic drivers stopped in Wethersfield and 73% of the non-resident black drivers stopped compared to only 63% of the non-resident white drivers stopped.”

This shows how out of town drivers impact the racial makeup of Wethersfield.

The report's conclusion talks about consent searches but the report itself only talks about searches. How many were Probable Cause/arrest searches versus consent? Why did the IMRP describe it this way?

Page 7, paragraph 3: “The high enforcement levels in this section of Wethersfield, that has both the highest concentration of black and Hispanic driving age residents and borders on a section of Hartford with a 55%

Hispanic and 17% black population base, appears to have had a considerable impact on both of these driving populations. The IMRP continue to describe Wethersfield's high level of activity near Hartford. Police District 2 has low call volume and when not on calls officers are directed to conduct motor vehicle activity.

In the Conclusion section **Page 21, paragraph 3:** **“The relative disparities in Wethersfield appear to be due to three basic factors: (1) the relatively high levels of enforcement in the northern tier of town which has both the highest resident minority driving age population and is most likely to have relatively high proportions of non-resident minority drivers traversing it because of its proximity to relatively high minority populations in the south end of Hartford; (2) the presence of significant traffic magnets along the Berlin Turnpike and Silas Deane Highway which generate a considerable number of calls for service, vehicle crashes, and traffic from surrounding communities; and (3) the significant use of equipment-related motor vehicle stops that disproportionately affected minority drivers.”** I'm not sure if there are more traffic stops in the northern tier of town because if you look at the graph/map generated on page 4, Figure 2.2, the traffic stops look pretty much spread out along the Berlin Turnpike and the Silas Deane Highway and the roads that connect them. However, if there are more stops in the northern tier of town, then it is probably because there are more people and traffic in the northern tier of town, not due to “Racial Profiling” by the officers. Especially because a large population in the south end Hartford choose to do their shopping in Wethersfield. Most people go to the closest place that gives them better value to do their shopping.

On this same page, **paragraph 5:** **“Based on the overall follow up analysis of the Wethersfield data, it is recommended that the Wethersfield Police Department: (1) review its traffic enforcement policies in the northern section of the town, with particular attention to the stop activity on the Berlin Turnpike and Silas Deane Highway, to evaluate the extent to which they may have a disproportionate effect on black and Hispanic drivers; (2) evaluate both the location and frequency of use of stops that do not directly involve unsafe driving behavior, to better understand the impact they may be having on minority drivers; and (3) review the role consent searches play in traffic stop searches to ensure that officers are not overly relying upon this as a search technique. It is also recommended that department administrators remind Wethersfield officers that the statutory reason why a misdemeanor summons was issued for stops that were made for infraction violations must always be entered as part of the data submission so that these outcomes may be tracked more accurately.”**

Traffic stops were low during high peak commuting hours, yet the estimated driving population (EDP) is based off commuting. This shows how wrong the IMRP was to focus originally on commuters. The high minority population in Wethersfield is because of pass through and those shopping or visiting business related establishments. While this report is long and wordy, to me there is not a lot of substance, other than the IMRP trying to justify that if the police lower the equipment related stops, and increase safety related stops, the police will change the percentage of stops of minorities (according to IMRP).

Conclusion: The IMRP is using faulty data to justify the recommendation to stop making motor vehicle stops based on equipment violations. Their own data in working out the numbers for the "Veil of Darkness" theory gave Wethersfield a much worse rating when equipment violations were taken out. This does not compute well for their recommendation.

The only thing the very expensive faulty reporting is doing by IMRP is hurting police-community relations.

Very truly yours,

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