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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF PORTLAND,

Defendant.

Case No. 3:12-cv-02265-SI

**JOINT STIPULATED MOTION TO
TERMINATE DISCRETE SECTION
(PCCEP) OF THE SETTLEMENT
AGREEMENT PURSUANT TO
PARAGRAPH 257**

MOTION

Plaintiff, the United States of America (United States), and Defendant, the City of Portland (City) (collectively, the Parties), jointly move the Court to terminate a discrete section of the Settlement Agreement (Agreement) under Paragraph 257 (ECF 499-2; ECF 506).

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(PCCEP) OF THE SETTLEMENT AGREEMENT PURSUANT TO
PARAGRAPH 257**

I. Termination of a Discrete Section Is Appropriate under Paragraph 257

a. Legal Standard

Pursuant to Paragraph 257 of the Agreement, once the Monitor's evaluations find that the City has adequately demonstrated that it has maintained substantial compliance with a discrete section of the Agreement for two consecutive Monitor's semi-annual reports after the section has moved into self-monitoring, the discrete section is eligible for partial termination, subject to Paragraph 259's process for determination if a discrete section is appropriate for termination.

b. Argument

With the Monitor's filing of the Semi-Annual Compliance Report for January 1, 2025 – June 30, 2025, ECF 526-1, the Parties agree that the following discrete section of the Agreement should be terminated:

Portland Committee on Community-Engaged Policing (PCCEP) (Paragraphs 141–44, 151–52). This section requires the City to establish PCCEP and provide PCCEP with administrative support, advice, and training. PCCEP, a committee of volunteers, leverages the ideas, talent, experience, and expertise of the community to do the following: solicit information from the community and the Portland Police Bureau (PPB) about PPB's performance; make recommendations to the Mayor (formerly Police Commissioner prior to City Charter amendments) and Police Chief, among others; advise on strategies to improve community relations and contribute to PPB's community engagement plan; and receive public comments and concerns. The Monitor has evaluated and agreed with the City's self-monitoring assessment of substantial compliance with this section in both semi-annual reports (ECF 490-1 at 85–90, ECF 526-1 at 88–94).

Additionally, in response to a concern raised by PCCEP at the January 6, 2026 status conference, the City notes that existing staff, consisting of a program manager and administrative support person, have provided community engagement support, and the City is currently recruiting

for a position that will have community engagement as its primary function.

Based on this, the Parties agree the PCCEP section, and its Exhibit 1, should be terminated.

II. CONCLUSION

The City has met its obligations under this discrete section. For all the reasons stated herein, the Parties move to terminate this discrete section under Paragraph 257.¹

IT IS SO STIPULATED BY THE PARTIES:

FOR THE CITY OF PORTLAND:

s/ Robert Taylor

ROBERT TAYLOR
City Attorney

s/ Heidi Brown

HEIDI BROWN
Chief Deputy City Attorney

s/ Sarah Ames

SARAH AMES
Deputy City Attorney

s/ Lisa Rogers

LISA ROGERS
Deputy City Attorney

¹ Under Paragraph 257, the joint stipulated motion will take effect as an order of the Court if the Court does not act within 45 days of the motion being filed.

FOR THE UNITED STATES OF AMERICA:

SCOTT E. BRADFORD
United States Attorney
District of Oregon

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

R. JONAS GEISSLER
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PATRICK MCCARTHY
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s/ Jeffrey R. Murray

JEFFREY R. MURRAY
Trial Attorney

s/ Catherine Yoon

CATHERINE YOON
Trial Attorney
Special Litigation Section
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United States Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2026, I served or caused to be served a true and correct copy of the foregoing **JOINT STIPULATED MOTION TO TERMINATE DISCRETE SECTION (PCCEP) OF THE SETTLEMENT AGREEMENT PURSUANT TO PARAGRAPH 257** on the interested parties in this action as follows:

<p>HARMEET K. DHILLON Assistant Attorney General Civil Rights Division R. JONAS GEISSLER Deputy Assistant Attorney General PATRICK MCCARTHY Chief JEFFREY R. MURRAY CATHERINE YOON Trial Attorneys Special Litigation Section Civil Rights Division United States Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530 Email: jonas.geissler@usdoj.gov Email: jeff.murray@usdoj.gov Email: catherine.yoon@usdoj.gov</p>	<p>Attorneys for Plaintiff, United States of America</p>
<p>Mark P. Smith Email: mark.p.smith@portlandpolicemonitor.com</p>	<p>Independent Court-Appointed Monitor</p>
<p>Anil Karia Email: anil@pslglawyers.com</p>	<p>Attorney for Intervenor-Defendant, Portland Police Association</p>
<p>J. Ashlee Albies Rian Peck Email: ashlee@albiesstark.com Email: rian@visible.law</p>	<p>Attorneys for Enhanced-<i>Amicus Curiae</i>, Albina Ministerial Alliance Coalition for Justice and Police Reform</p>
<p>Juan Chavez Email: jchavez@ojrc.info</p>	<p>Attorney for <i>Amicus Curiae</i>, Mental Health Alliance</p>

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by **electronic service** via the Court's CM/ECF electronic filing system for registered users.

DATED: March 3, 2026.

PORTLAND CITY ATTORNEY'S OFFICE

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Sarah Ames, OSB No. 163350

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Of Attorneys for Defendant City of Portland