



*"The Only Union for Police Officers and 911 Dispatchers"*

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Dear Members of the Use of Force Study Commission:

The Massachusetts Coalition of Police has always been dedicated to assisting our members in providing the very best in police service to their communities. We have always advocated for increased training and funding for that training. Since Ferguson, we have tried to be active participants in the police reform movement. We have always stood by the notion that education creates good police officers and that has proven true in that Massachusetts has very few incidents comparable to others around the country. Despite that, we end up with a police reform law that was rushed through the legislature with little to no study of important concepts and people with little to no experience in policing drafting rules of engagement. This lack of experience, training, study, and education on the subject matter has produced law that will result in years of litigation and uncertainty.

This brings us to the proposed CMR's entitled "Use of Force by Law Enforcement Officers". In attempts to comply with unrealistic timeframes outlined in the Police Reform Law, the MPTC has drafted proposed regulations that include ambiguous terms and guidance which will ultimately lead to litigation. The Massachusetts Coalition of Police has been consistent in our call for properly studied reforms, prior to implementation. These regulations, as proposed in the rushed manner that they have been promulgated, will succeed in providing confusing guidance and create not only a dangerous environment for law enforcement, but also for the people we protect. It will lead to under response by many officers, which will further escalate situations, which is the exact opposite of the stated intent of the regulations.

Once again, we call for the MPTC and the POST to slow this process down, take a hard look at the subjects that you are regulating, and create good positive reform that works for all stakeholders. Rushing through this process to meet artificial deadlines will result in municipalities and the state spending large amounts of money to litigate situations caused by these regulations and the faulty policies derived from them. Unfortunately, in the real world, ambiguous regulations and policies will cost people their lives.

Sincerely,

*Scott Hovsepian*     *John Nelson*     *Robert Murphy*     *Tim King*

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