



# **WORTHINGTON DIVISION OF POLICE**

## **Memorandum**

*Integrity, Respect, Commitment, Honesty, Professionalism*

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To: **Chief Stephen Mylett**

From: **Lt. Michael Holton**

Date: **January 10, 2025**

Subj: **Self-Initiated Traffic Stop Citation & Traffic Warning Data Review for 2024  
Bias-Free Policing Analysis**

### **Bias-Free Policing Analysis**

The mission of the Worthington Division of Police is to foster a partnership with the community that enhances all aspects of the quality of life. We believe this mission is best accomplished by being responsive to changing community needs and responsible for our actions at all times.

We will always be alert to the constant necessity for impartial enforcement action, recognizing the need for understanding diverse cultures, lifestyles, and age groups. Enforcement action is one part of a complete officer; we emphasize courtesy and fairness in all situations.

Officers strive to achieve the mission of the division through actions that are guided by our core values. The Division's core values are:

#### **Integrity**

We will always maintain a character of high standards and do what is legally, ethically, and morally right.

#### **Respect**

We are dedicated to being objective, fair, consistent, and compassionate in the treatment of our community and fellow employees in all of our actions.

#### **Commitment**

We strive to consistently do what is right and build strong working relationships with co-workers and community members through open and timely communications.

#### **Honesty**

We are truthful and open in our interactions with each other and with members of our community.

#### **Professionalism**

We are dedicated to treating all people with respect, fairness and compassion while continually pursuing the highest levels of knowledge, skills, and expertise.

## **Division of Police Policy on Bias-Free Policing**

*Policy 401 - Bias-Free Policing* was written in compliance with the Ohio Collaborative Law Enforcement Agency Certification (OCLEAC) Standard 6 – Bias-Free Policing. The policy guides Division members and affirms the Division's commitment to fair, impartial, and objective policing. The policy also establishes appropriate controls to ensure employees do not engage in bias-based policing or violate laws while serving the community.

The policy covers all aspects of bias-free policing, including definitions, the prohibition against bias-based policing, training, corrective measures, and administrative review of Division practices. All Division employees must read and electronically acknowledge that Bias-Free Policing Policy 401 is available to all members through LEXIPOL'S Knowledge Management System (KMS) and PowerDMS. Additionally, LEXIPOL releases Daily Training Bulletins (DTBs) throughout the year which tests officers' knowledge of all issued policies. This includes questions related to Bias-Free Policing Policy 401.

## **Ohio Collaborative Law Enforcement Certification (OCLEAC)**

The OCLEAC was established to implement recommendations from the Ohio Task Force on Community-Police Relations. This community-based law enforcement advisory board was tasked with establishing statewide standards to guide law enforcement agencies with policy development.

The advisory board specifically established Standard 6 – Bias-Free Policing, and the Division has met all standard requirements and has received certification for this standard. Additionally, the Division complies with and is certified in all standards established by the Ohio Collaborative Community-Police Advisory Board.

## **Bias-Based Citizen Complaints**

The Division thoroughly investigates all allegations of bias-based policing by citizens. Additionally, the Division utilizes video recording systems in marked police vehicles and body-worn cameras to investigate alleged bias-based policing by officers.

A five-year look back (2020–2024) period of personnel complaints received by the division yielded three bias-based complaints. All incidents were investigated and determined to be proper conduct by the involved officers.

- 2021 - A citizen (white female) complained that officers racially profiled a victim (African American) and witnesses (African American) by requesting identification during a domestic violence investigation.
- 2023 – A citizen complained that officers stopped her son and his friends because of their race (African American).
- 2024 – A citizen complained that an officer stopped him because he was an African American driving a Mercedes.

## **Administrative Review of Bias-Free Policing Data**

A command staff member is tasked with reviewing the traffic stop bias-free policing data to determine any patterns of bias-based policing or concerning practices. The administrative review did not find any indications of biased-based policing that require further inquiry.

## **Traffic Stop Data Review**

Policy 401 *Bias-Free Policing* requires officers to collect data from self-initiated traffic stops by recording the race, gender, and disposition of the interaction. The data denotes the perceived race and gender of the driver of the involved vehicle once contact is made, as well as the actual disposition of the traffic stop (verbal warning, written warning, or citation).

It is a requirement that the sex and race category be noted on traffic citations and traffic warnings. They are identical to the categories defined by National Crime Information Center (NCIC). The definitions from the NCIC are listed below:

Value	Definition
I = Indian	American Indian or Alaskan Native – a person having origins in any of the original peoples of the Americas and maintaining cultural identification through tribal affiliations or community recognition
A = Asian	Asian or Pacific Islander - a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands
B = Black	Black - a person having origins in any of the black racial groups of Africa
W = White	White - a person having origins in any of the original peoples of Europe, North Africa, or the Middle East
U = Race is unknown	Unknown

### Data Analysis

This analysis focuses on 2024 data collection, observations, and the use of appropriate benchmarks to ensure proper and responsible conclusions. (See Data Analysis Commentary at the end of this report)

Methodologies used for this report:

- Traffic Crash Data: Race and Gender of drivers cited in traffic crashes from Worthington Division of Police 2024 Traffic Crash Reports.
- A review of the Division's 2024 traffic stop data.
- Professional Judgement: An administrative review of bias-based policing data was conducted by members of the Command Staff.

### Data Collection Criteria for Traffic Stops

Traffic stop data for this analysis was queried from the division's computer-aided dispatch (CAD) system. The data includes 2901 self-initiated traffic stops.

Refer to the below-listed table for race and gender information of the 2782 individuals who were issued traffic citations and/or written traffic warnings during 2901 self-initiated traffic contacts in the City of Worthington in 2024. (Writer's note: Some violators may have been issued a written traffic warning and a written traffic citation if they had committed multiple traffic offenses. Some violators may not have been issued either a written warning or written citation.)

To maintain the five reporting categories as identified by National Crime Information Center (NCIC) and the Ohio Collaborative, the following adjustments were made and included in the "Unknown" male or female category:

- Twenty-nine (29) males were issued traffic citations where race was not identified
- Thirty-four (34) males were issued written warnings where race was not identified

- Nine (9) females were issued traffic citations where race was not identified
- Thirty-six (36) females were issued written warnings where race was not identified

**Traffic Citations and/or Traffic Warnings - 2024  
01-01-24 through 12-31-24**

Race	Male	Percent of total	Female	Percent of total
White	1123	40.37%	680	24.44%
Black	497	17.86%	281	10.10%
Asian	59	2.12%	33	1.18%
Indian	1	0.04%	0	0.00%
Unknown	63	2.27%	45	1.62%
<b>Individuals Issued a Traffic Citation and/or a Traffic Warning</b>	<b>1743</b>		<b>1039</b>	<b>Total: 2782</b>

These numbers represent data for 2782 individuals who were issued traffic citations and/or written traffic warnings during 2901 self-initiated traffic contacts between 01-01-24 and 12-31-24. The new database for collecting traffic citations and written traffic warnings commenced in January 2020. This is being utilized to avoid the complex variables and address outcomes of conflicted baseline data that might be generated from the 2020 US Census data in which we cannot delineate licensed drivers within the confines of our jurisdictional boundary. Please be aware that we deal with the crossroads of two major federal interstates, two interstate routes, and one US route. Without a verifiable benchmark, it is difficult to determine what percentage of self-initiated traffic stops would indicate racially biased policing. The objective of using a baseline value and thus benchmarking is to understand if there is a causal relationship between a characteristic of the driver (e.g., race, gender, and/or age) and the decision by police to initiate a traffic stop.

The most reliable benchmarks look to develop a profile of who should be stopped within a jurisdiction without biased decision-making. Noting there are complicating factors, such as the diverse driving behaviors of various groups (e.g., racial, ethnic, gender, and age groups) that travel our roadways. Additionally, nonresidents (commuters) travel on our jurisdiction's roadways, are involved in traffic crashes, and are stopped by police officers for traffic violations.

In 2024, the Worthington Division of Police recorded a total of 421 traffic crashes, which occurred on public roadways and private property. Of the 421 traffic crashes, 293 drivers were found at-fault and issued a traffic citation. Issuing citations to at-fault drivers is the preferred course of action and officers have little discretion, which makes this category desirable for data comparison. Dr. Richard Johnson (2019) notes in a research brief that traffic crash data is one of the best benchmarks to measure poor driving behavior and should be used when comparing traffic stop data.

Note: Race and ethnicity codes are limited for crash reporting; therefore, traffic crash data does not include Middle Eastern, Hispanic, or Other.

**Traffic Crash Citations - 2024**  
**01-01-24 through 12-31-24**

<b>Race</b>	<b>Male</b>	<b>Percent of total</b>	<b>Female</b>	<b>Percent of total</b>
White	125	42.66%	85	29.01%
Black	42	14.34%	26	8.87%
Asian	5	1.71%	2	0.68%
Indian	0	0.00%	0	0.00%
Unknown	6	2.05%	2	0.68%
<b>Traffic Crash Citations Issued</b>	<b>178</b>		<b>115</b>	<b>Total: 293</b>

These numbers represent data for 293 individuals found at fault and issued traffic citations in 421 traffic crashes in the City of Worthington between 01-01-24 and 12-31-24. Officers could only determine the at-fault driver in 69.60% of all traffic crashes.

Officers use several factors to determine the at-fault driver, including statements from the involved parties, statements from uninvolved third-party witnesses, video, and physical evidence. Absent these, and/or coupled with conflicting statements, officers may be unable to determine the at-fault driver, and thus, no citation can be issued. Additionally, unless involving an impaired driver or reckless operation, officers are limited in issuing traffic citations to at-fault drivers of traffic crashes on private property.

When removing private property crashes, of which there were 49 in 2024, from the traffic crash statistics, officers determined at-fault drivers in 78.76% of the 372 traffic crashes that occurred on public roadways in 2024.

### **Conclusions**

One single data set or observation should not be used independently to conclude whether bias-based policing practices exists. It is important and reasonable to examine an entire body of work before drawing conclusions, which include:

- The Division reinforces fair, objective, and impartial policing through the organizational Mission and Core Values.
- The Division has Bias-Free Policing policies in place that prohibit bias-based policing.
- The Division has Community Relations policies to promote a culture of sound community–police relationships.
- The Division has a formal complaint process where community members may file a complaint for bias-based policing, and complaints are investigated. This can be accomplished in person, online, or by phone.
- The Division requires annual training on Bias-Free Policing, and the training is up to date.
- The Division requires data collection on all traffic stops which is used for analysis.
- The Division is certified by Ohio Collaborative Law Enforcement Agency Certification (OCLEAC), which shows a commitment to maintaining strong police–community relationships.

After reviewing the data, complaints, and division practices, this report concludes there is no evidence of bias-based policing by the Division or members of the Division.

## Data Analysis Commentary

The primary guiding document for this analysis is a study published by the U.S Department of Justice Office of Community Policing Services titled *How to Correctly Collect and Analyze Racial Profiling Data: Your Reputation Depends on It!*

The publication provides a summary of many important methodological issues surrounding this topic. Additionally, it offers recommendations to law enforcement practitioners on collecting and analyzing racial profiling data more accurately.

The greatest challenge with data analysis is how to establish comparison benchmarks. No standard formulas or benchmarks will automatically point to a culture of bias-based policing. As each jurisdiction is unique, there are too many variables to create a “one size fits all” approach. A couple of methodologies were utilized in this analysis to review and compare the bias-based policing data administratively. The following methodologies were employed as a frame of reference to apply context to the bias-based data collected. When combined with community input/concerns and Division practices, proper conclusions and recommendations can be made to ensure bias-based policing does not exist.

Information on the use of population data:

Historically, traffic stop data was compared to jurisdictional population estimates. However, census data often fails to provide an effective data analysis benchmark or baseline. As detailed by the U.S. Department of Justice (DOJ) – Office of Community Oriented Policing Services (CPOS) in the publication *How to Correctly Collect and Analyze Racial Profiling Data: Your Reputation Depends On It*, most analysis shows that police stops are not proportional to population data. The primary reason for this is the residential population does not consider variables such as visitors traveling through the city, the daytime motor vehicle transportation population, the number of traffic violations being committed, and the race and gender of the driver of those vehicles (p. 84-85).

Additional research by Dr. Richard Johnson supports this conclusion. Dr. Johnson (2019) concludes that “Using census statistics as a benchmark, that in no way resemble the driving population or the traffic violator population, is just one of these many methodological errors.” (p. 4).

## References:

Johnson, Richard R. Ph.D., (2019, December). Racial Profiling or Bad Research? Why We

Should Stop Using Census Data. Dolan Consulting Group. Retrieved from

<https://www.dolanconsultinggroup.com/news/racial-profiling-or-bad-research/>

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Project Report for Racial Profiling Data Collection and Analysis. (Washington, DC:

Government Printing Office, 2002).