



OHIO PATROLMEN'S BENEVOLENT ASSOCIATION

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Representative Cindy Abrams
Chair, Ohio House of Representatives Public Safety Committee

Proponent Testimony – Senate Bill 114 May 20, 2025

Chair Abrams, Vice Chair Miller, Ranking Member Thomas, and distinguished members of the House Public Safety Committee, thank you for the opportunity to testify on Senate Bill 114, which was referred to this committee after passing unanimously in the Senate. My name is George Sakellakis, and I am the Director of Organization with the Ohio Patrolmen's Benevolent Association, representing 8,000 members of Ohio's finest. I am also in my twenty-fourth year of full time service as a police officer. The Ohio PBA is a proud proponent of this bill, which will prohibit ticket and arrest quotas and clearly project to Ohioans that traffic and criminal law enforcement is unequivocally based on safety, and not revenue.

Ticket and arrest quotas are generally viewed negatively across the board; both the public and the officers who are subject to them view them as unethical, likely unconstitutional, and patently unfair. I can speak for the Ohio law enforcement officer when I say that street-level officers, like the rest of the public, want Ohioans to be assured that any citations or arrests are only with the appropriate and legitimate interests of public safety in mind.

Unfortunately, quota mandates, while not in place in a majority of agencies, are prevalent enough that action from the General Assembly is necessary. Few agencies actually call them a "quota." They are often disguised using terms like "performance standards," or buried in "logsheets policies" and "periodic evaluations." Sometimes they are as blatant as a written policy mandating a certain number of tickets, as the documents I provided show. Often, they are not in writing at all, and are enforced arbitrarily against officers who wish to remain on a specialized unit, get promoted, get a positive performance review, maintain their work schedule or even just their employment. This bill would prohibit the use of quotas for those reasons, no matter what they're called or how they're concealed from the community.

There is no safety-based justification to quotas. In fact, officers who have quotas imposed on them inevitably get into very negative, needless and oftentimes dangerous interactions with the public. They are connected to citations and arrests for minor violations that would normally never even merit a stop, and unfortunately, in other jurisdictions, have been linked to situations where an offense did not even occur. This is why quotas bring up serious constitutional questions of due process. Furthermore, quotas pull officers away from qualitative, proactive enforcement on issues that actually affect our safety, which is what we as Ohioans want them doing, and direct them toward quantitative, numbers-based enforcement that is only based on one thing – money.

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This committee has heard the eye-opening testimony of former Independence Patrol Commander Mazzola. I have included some of the documents from that time with my written testimony, including messages threatening good police officers with removal from specialized units that are vitally necessary to the community, such as a regional task force combating *human trafficking*, of all things. There are documents showing how community concern over increased traffic citation production for very minor violations led to departmental orders to target areas where less actual safety-related violations were occurring, but where more non-residents would be cited. You've heard how Commander Mazzola, a highly principled officer and outstanding leader, was forced out of the department over the mere suspecting of being the one who let the media know what that department was doing. I want this committee to consider the impact that the loss of his services had on the Independence police department and the greater community.

I can assure you that what happened in Independence is not an anomaly. Many law enforcement officers have reported similar problems, and they are devastating to those agencies. I would like you to reflect on the damage that quotas cause to police departments and how their communities are affected, like a nearby agency that has seen a turnover of 85% of its officers since a quota-mandating chief has taken the helm, and still to this day is simply unable to get to full staffing. Our organization instead fully endorses the leadership principles of those like Chief Robert Butler's, who took over as Chief at the Independence Police Department and is righting those wrongs of the past. Chief Butler correctly describes quotas as a "lazy approach to management," and a "relic of outdated leadership practices."

To be sure, as President of the Ohio Association of Chiefs of Police, Chief Butler's views on quotas represent the majority view, but there are definitely enough agencies that still use the practice to merit attention from this body. We stand behind other organizations like the Fraternal Order of Police, Ohio State Troopers Association, Police Patrolmen's Associations of Cleveland and Toledo, and many others who have thrown their support behind this bill. We also are very thankful to the sponsors of these bills; Senator Tom Patton and Representatives Bride Sweeney and Kevin Miller, who have heard the alarms from Ohio's law enforcement officers and who have responded accordingly.

When agencies arbitrarily dictate a certain number of arrests or citations that an officer must issue to keep their job, the trust between the public and law enforcement, as well as the very nature of constitutional policing, is needlessly tested. Ohioans must be assured that any citation or arrest is valid, legitimate, and necessary. Police Officers, Sheriff's Deputies and Troopers are true professionals who risk their lives to serve our communities, not revenue generators. They got into this business to protect our neighborhoods, not occupy them. We are thankful that this General Assembly is tackling this important issue, and urge you to pass this bill and end the practice of quotas in Ohio.

Sincerely,



George Sakellakis
Director of Organization
gsakellakis@opba.com

Department #1

Email from Chief of Police about traffic citations declining slightly.

Email from Lieutenant to officers implementing what the Chief ordered; “productivity standard” of 10 traffic citations per month.

Email from officer who was “spoken to” about NOT referring to the standard as a “quota,” but as a “performance standard.” The officer confirms being spoken to about using more discretion in citing city residents, and told to cite more non-residents. Officer threatened with removal from specialized unit fighting human trafficking. Officer confirmed he will avoid traffic enforcement in areas where city residents tend to be. Officer felt the need to put these in writing, even though he was told to “keep it verbal.”

Follow-up email from Chief to the officer.

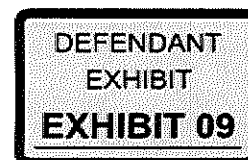
From: Michael Kilbane
Sent: Friday, July 20, 2018 8:34 PM
To: Leonard Mazzola
Subject: productivity

Lenny,

Mayor's court gave their report to the Mayor and he was asking why our traffic citation productivity has declined. For the first six months of 2017 we had 1696 tickets but for the same period in 2018 we only have 1504. In June of 17 we wrote 283 but in June of this year we only had 173 (75 of those were detail tickets). Accidents and incident reports were also higher last year. Year to date we are about 200 tickets behind last year.

There are some patrolmen that are not even writing a single ticket a month on average. Get with your sergeants ASAP and get this turned around. There is no way I can sell the Mayor on adding another officer this Fall if it appears there is not enough work for the ones we already have. Please get with me early next week with a plan to fix this.

Chief K.



Leonard Mazzola

From: Leonard Mazzola
Sent: Tuesday, September 25, 2018 04:11 PM
To: Police; Dispatchers
Cc: Data Entry
Subject: Performance Standard



Patrol,

Effective 10/01/2018,

Over the last month, I have had multiple conversations with Chief Kilbane, concerning Patrol Productivity, discussed at length was traffic citations totals.

After much discussion, it has been decided by the Chief of Police, that I now implement, monitor and manage a Performance Standard for all the officers in the Patrol Division. This Performance Standard will include everything from effective policing to performance and productivity.

The Patrol Sergeants will have a significant role in monitoring their individual shifts' compliance with the Performance Standard.

Chief Kilbane has set a minimum Performance Standard of approximately 3000 traffic citations/year for Patrol as a whole, this figure includes Overtime Traffic Details. To obtain this goal, approximately 2000 tickets need be written on shift, and approximately 1000 tickets need to be written on Overtime Traffic Details.

We have a total of 18 Full Time Patrolman in our Patrol Division, Monthly breakdown is $2000/18/12 = 9.26$;

To meet this Productivity Standard, Patrol Officers shall meet or exceed 10 traffic citations/month.

This Productivity Standard is independent of time off, special assignment, and OIC assignment.

To ensure this Performance Standard is met, I will be running quarterly reports on officers to ensure compliance, this way an officer with extended time off or assignment will have sufficient time to meet the Productivity Standard without unreasonable demand. The first reporting period will be the last quarter of 2018, Oct18-Dec18.

It is also understood that each Patrol Shift is different in the amount and types of traffic they may encounter daily and that your first responsibility is to protect and serve the public; however this does include traffic enforcement. We will not in any way reduce our level of service, professionalism, or officer safety to meet our Performance Standard.

Please keep in mind that the Performance Standard set by the Chief is not unattainable and can be met.

I have been directed to report any Officer failing to meet their Performance Standard to their Sergeant & Chief Kilbane.

This is a new procedure for us, so no doubt there will be items to work out. I understand, and will do the best I can to operate Patrol as efficiently as possible.

From: [REDACTED]
Sent: Tuesday, January 15, 2019 1:26 AM
To: Leonard Mazzola
Cc: John Kurtz
Subject: Counseling in Regard To Residential Traffic Enforcement

Lieutenant Mazzola,

Upon arrival at 1800 on 01/14/19 you spoke to me on behalf of the Chief of Police in regard to my use of the term "quota" describing the "performance standard" whereby a certain number of traffic citations are required in a prescribed period of time or disciplinary procedures will result. I will change my terminology from the word "quota" to "performance standard" in all future conversations.

Secondly, you indicated to me that the Chief of Police wished to convey a message that I was to exercise more discretion when deciding whether to cite a resident of the City Of Independence. You indicated that Chief Kilbane was clear, if I didn't comply with this order my "limited involvement" in (The Cuyahoga County Regional Human Trafficking Taskforce) "would become none". This message has been received, I will increase my standards for what I consider a "citable" violation for residents of the City Of Independence. Also, I will try to avoid areas when possible where I know residents may be committing violations at a more frequent rate than other nonresidents.

Lastly, I was acting in good faith with my previous residential citations, I was attempting to meet the "performance standard" while at the same time enforcing traffic violations on Chestnut Rd. within the City Of Independence for any speed in excess of forty miles per hour in a posted twenty five mile per hour zone without regard to residential status. This location was picked by your office and was predicated on residential complaints. Please note, I requested that you place this conversation in writing for my records, and you advised that the Chief of Police instructed you "to keep it verbal".

Sincerely,

Patrolman [REDACTED]



From: Michael Kilbane
Sent: Tuesday, January 15, 2019 3:45 PM
To: [REDACTED]
Cc: Leonard Mazzola
Subject: Patrol Duties
Attachments: 402 Professional Traffic Stops.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Patrolman Bates:

Lieutenant Mazzola shared with me your response to his counseling regarding your traffic enforcement actions and I wanted to clarify the department's position. Traffic safety and enforcement are core responsibilities for patrol officers. A required proficiency for every officer assigned to patrol is the ability to identify safety-related violations and take appropriate actions such as a citation or a warning. This patrol proficiency should be demonstrated by every officer on an ongoing basis and Lieutenant Mazzola, with my full support, has the right to expect reasonable performance outcomes that show officers are continually demonstrating this proficiency.

Quality, discretion and professionalism are vital components of the traffic enforcement process. Severity of the violation, the violator's driving record and if the driver lives/works in our city are all factors that need to be considered when making this discretionary decision. Warnings are more effective for people that live and/or work in Independence because our officers will be much more likely to encounter these drivers if they commit infractions after being warned. It is much more difficult to gauge the effectiveness of warnings to drivers that do not frequent our roads.

Professionalism while conducting traffic stops is also a core requirement for all patrol officers. Informing a driver that they are being cited because the officer is under a "quota" or performance standard or any similar type language is unnecessary, unprofessional and serves no legitimate law enforcement purpose and these types of statements will cease immediately. Drivers are stopped and warned/cited because they committed a traffic violation and an officer's responsibility is to take appropriate action.

Many patrol officers such as you have additional duties and assignments in addition to their core responsibilities as patrol officers. If any officer displays issues with performance or professionalism in the conduct of their patrol duties one of the options is to remove those ancillary duties and assignments so the officer can focus on their patrol duties, which are obviously a priority for this department.

I have attached a copy of our General Order 402: Professional Traffic Stops. Please review this policy as it addresses departmental expectations for conducting traffic enforcement. Let me know if you have any questions.

Chief Kilbane



Department #2

One policy states they don't have a ticket quota. Another policy provides for discipline if they don't have "proactive enforcement" at a certain number when compared with their peers.

Traffic Function and Responsibility

500.1 PURPOSE AND SCOPE

The goal of traffic law enforcement is to reduce traffic collisions, prevent crime, help solve crime, and improve the safety and quality of life for the community through traffic law compliance. This may be achieved through the application of such techniques as geographic/temporal assignment of personnel and equipment and the establishment of preventive patrols to deal with specific categories of unlawful driving behavior. Traffic enforcement techniques are based in part on collision data, enforcement activity records, traffic volume and traffic conditions. This department provides proactive enforcement efforts toward violations, not only in proportion to the frequency of their occurrence in collision situations but also in terms of traffic-related needs.

500.2 OFFICER DEPLOYMENT

Several factors are considered in the deployment of officers for traffic enforcement. Some of the factors for analysis include:

- Location
- Time
- Day
- Violation factors

All officers assigned to patrol or traffic enforcement functions will emphasize proactive enforcement of traffic laws. As a matter of routine, all officers will take directed enforcement action on request, and random enforcement action when appropriate, against violators. All officers should maintain high visibility while working both general patrol and general enforcement.

Other factors to be considered for deployment include but are not limited to citizen requests, construction zones, school zones or special details (e.g. Operation Stonegarden, TOPS, special events).

500.3 ENFORCEMENT

Enforcement actions are commensurate with applicable laws and take into account the degree and severity of the violation committed. Although this Department maintains a philosophy of proactive use of unobligated service time, it does not establish ticket quotas. The number of arrests or citations issued by any officer shall not be used as the sole criterion for evaluating officer overall performance. The visibility and quality of an officer's work effort will be commensurate with the philosophy of this policy.

500.3.1 WARNINGS

Take appropriate, documented enforcement action on every stop; generally a citation or arrest. However, warnings may be considered in each situation as a discretionary substitute for arrests or citations when circumstances warrant.

Department #2 Evaluation Policy

5. Outstanding: Requires no assistance and always takes proper course of action with routine task.

(18) **Performance: stress**

1. Unacceptable: During stressful events becomes emotional and panic stricken, unable to function, and often loses temper.
3. Meets Standards: Exhibits calm and controlled attitude, does not allow situation to further deteriorate.
5. Outstanding: Maintains control and brings calm to any stressful event without assistance.

(19) **Quantity of Work**

1. Unacceptable: Does not see or avoids activity. Does not follow up on assignments, rationalizes lack of work product. Self-initiated activity poor. Proactive enforcement activities consistently below peer group average of plus or minus 15% as required of employee performance policy.
3. Meets Standards: Recognizes and identifies tasks which need completed and seeks out activities during their shift. Self-initiated activity consistent and average. Proactive enforcement activities fall within peer group average of plus or minus 15% as required of employee performance policy.
5. Outstanding: Continuously completes task and activity by using the resources available. Self-initiated activity always at or near best in department. Proactive enforcement activities far exceed peer group average of plus or minus 15% as required of employee performance policy.

(20) **Quality of Work**

1. Unacceptable: work is inaccurate, ineffective, not thorough and unacceptable. Often has to be redone. Reduces overall effectiveness of unit and volume of work. Reflects adversely on the department.
3. Meets Standards: Usually accurate, makes only average number of mistakes. Mistakes do not adversely affect effectiveness of unit nor reflect poorly on the department.
5. Outstanding: Always accurate. Mistakes are few and far between. Quality of work improves efficiency of unit and promotes professionalism of department.

(21) **Communication Skills**

1. Unacceptable: Unable to clearly articulate thoughts, ideas, meanings, instructions, order, etc. Uses improper voice inflection, indecisive, poor voice command. Does not listen or comprehend properly.
3. Meets Standards: Speaks with authority. Able to clearly articulate thoughts and ideas and transmit instruction, orders, etc. Uses proper voice inflection and words, decisive, proper voice command. Listens and comprehends.
5. Outstanding: Excellent command of the English language. Able to completely articulate thoughts, ideas, instructions and orders. Has complete voice command. Excellent listener and has complete comprehension.

Department #3

Letter establishing “shift goals” of clear numbers of tickets/arrests. A pre-disciplinary letter issued to an officer advising that they fell below the “shift goals,” and if they improve, they will be “removed from the behavior modification.”

MEMORANDUM

*Operations Division
InterOffice Memo*

To: **All Patrol Personnel**
From: **[REDACTED]**
Operations Commander
Date: **January 20, 2022**
Subject: **Shift Goals 2022**

In accordance with section 13.10c of the contract, shift goals have been established for the 2022 evaluation year. The general shift objectives have also been designated.

For 2022, the numerical goals will remain the same as 2021, although they have been prorated to reflect 11 months since we were operating under COVID protocols for the majority of January. The goals will consist of a combination of traffic citations, arrests, and written warnings. Officers will need to achieve 75% of the goal every 90 days to be in compliance with the collective bargaining agreement and eligible for their pick of shift in 2023. To achieve a standard rating in quantity of work, officers will need to achieve 95% of the goal with a minimum of 75% of the goal consisting of traffic citations and criminal arrests. Work ratio will NOT be used in computation of performance goals.

Aggressive and consistent traffic and criminal violation enforcement throughout the entire year is expected from all officers. Self-initiated activity addressing both criminal and traffic enforcement is expected. Officers must also address the identified shift objectives for their respective shift throughout the year.

Officers are expected to exercise good judgment and common sense in their enforcement of both criminal and traffic violations.

[REDACTED]
Operations Commander

SHIFT GOALS FOR 2022

YEARLY AVERAGE	MONTHLY AVERAGE
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[Handwritten signature]

7:00 A.M. to 7:00 P.M.		
Traffic /Arrests/ WW	143	13
7:00 P.M. to 7:00 A.M.		
Traffic /Arrests/ WW	123	11

SHIFT OBJECTIVES – 2022

Day Shift

- Aggressive Traffic enforcement
 - **Selective Enforcement (SE):** US 20, SR 615, SR 306, SR 283, SR 84, SR 2, IR 90, Heisley Road, and Tyler Boulevard.
 - **Side Street (SS):** All Residential Streets
 - **School Zones (SZ)**
 - **Seat Belts and Child Restraints (SB)**
 - **Traffic Calming (TC):** Daily Bulletin Special Attention Areas, SE Assignment Sheets, Traffic Blitzes
 - **High Accident Areas**
- Self-Initiated Criminal Arrests
- Proactive, high-visibility patrol in retail, residential, commercial, and recreation areas



City of [REDACTED]
Behavioral Modification Form

Date: February 23, 2023

Employee# 578

Last Name: [REDACTED]

First Name: [REDACTED]

REASON FOR WARNING:

1. Reason for Counseling:

The dayshift activity goal for 2022 was 143 citations/arrests/written warnings. 75% of this number was required to be a combination of citations and arrests. You had a total of 74 citations, 26 arrests, and 1 written warnings. The citations and arrests were only 70% of the shift goal for the year.

2. Recommendations for Improvement

Per memorandum OD23-002, the shift goal for 2023 is 1.1 contacts (tickets/arrests/written warnings) per shift worked. You are expected to meet this goal.

3. Action Taken: Your activity will be monitored for a minimum of six months from the date you are issued this behavior modification. At the end of 90 days, your activity will be noted to see if you are in compliance. After that, you will continue to be monitored over the next 90-day period. If you have successfully met shift goals, you will be removed from the behavior modification. Section 13.10c of the collective bargaining agreement requires you to meet at least 75% of your shift goal throughout each 90-day period.

The department believes the above act, if continued, could result in disciplinary action.

Signature: [REDACTED]

(Acknowledges review & receipt of this notice)

Date: 3/4/23

From: [REDACTED]

Date: 3/4/23

Department #4

“Departmental Log Sheet Policy.” The main topic of the “log sheets” is that officers must have at least two traffic stops per shift, with at least five “enforcement actions” (ticket or arrest) per pay period.

POLICE DEPARTMENT

7-17

SUBJECT: Departmental Log Sheets

EFFECTIVE DATE: February 3, 2022

I. PURPOSE:

The [REDACTED] Police Department provides public safety services to all those in the city. The purpose of this policy is to provide documentation of the provision of those services.

II. POLICY:

It is the policy of the [REDACTED] Police for patrol officers, supervisors, and detectives to complete a daily log sheet to document their activity during their assigned shift.

III. PROCEDURES:

A. Patrol Officers

1. Patrol officers are to complete a daily log sheet documenting actions.
 - a. The log sheet shall contain
 - i. At least one interaction per hour of work.
 1. Misc. interactions can include calls for service, business checks, MVAs, community contacts, complaints, dispositions, etc.
 - ii. At least two traffic stops per shift, with at least five enforcement actions issued per pay period.
 1. Enforcement Actions:
 - a. Traffic Citation
 - b. Misdemeanor Criminal Charge
 - c. Felony Criminal Charge
 - d. Warrant Arrest
2. Patrol officers will also include their zone assignment, mileage driven, date, and shift worked on their log sheet.
3. At the end of each shift, the officer will turn in their log sheet to their supervisor.

B. Supervisors

1. Supervisors are to complete a daily log sheet documenting at least one interaction per hour of work.
 - a. The logsheet shall contain
 - i. At least one interaction per hour of work.
 1. Misc. interactions can include calls for service, business checks, MVAs, community contacts, complaints, dispositions, etc.
 - ii. At least one traffic stop per shift, with at least two enforcement actions issued per pay period.
 1. Enforcement Actions:
 - a. Traffic Citation
 - b. Misdemeanor Criminal Charge
 - c. Felony Criminal Charge
 - d. Warrant Arrest
2. Supervisors will also include mileage driven, date, and shift worked on their log sheet.
3. At the end of each shift, the supervisor will turn in their log sheet to the captain.
4. Supervisors are responsible for maintaining an orderly record of log sheets which will be used in quarterly performance reviews.

C. Detectives

1. Detectives are to complete a daily log sheet documenting their daily activity and case(s) worked.
 - a. Activities:
 - i. At least two business checks per shift.
 - ii. Document activities taken for their assigned case(s).
2. Log sheets will be turned into the detective supervisor at the end of their shift.

D. Detective Supervisor

1. The detective supervisor is to complete a daily log sheet documenting their activity and cases worked.
 - a. Activities:
 - i. At least one business checks per shift.
 - ii. Document activities taken for their assigned case
2. Log sheets will be turned into the captain at the end of their shift.
3. Supervisors are responsible for maintaining an orderly record of log sheets used in quarterly performance reviews.

E. Major Case, Special Assignments and Events that take up extended period of time.

1. Any event that takes an officer off of the road for an extended period of time may be considered when evaluating officers.
2. If during any officer evaluation the officer falls below any standard and a supervisor believes that there is an acceptable reason (ie major case) a supervisor may in writing appeal to the Chief or Captain for a variance.

By order of:



Chief of Police