

From: [Scott Eberle](#)
To: [Teresa Komoda](#)
Subject: FW: PAAC Recommendations for Equitable Policing in San Rafael
Date: Tuesday, June 17, 2025 7:38:01 AM
Attachments: [MVFREE to SR & PAAC 6-16-25.pdf](#)
[SR Stop & Population Percentages.pdf](#)

From: MV FREE <action@mvfree.org>
Sent: Monday, June 16, 2025 8:53 AM
To: Mayor Kate <kate.colin@cityofsanrafael.org>; Maika Llorens Gulati <maika@cityofsanrafael.org>; Eli Hill <eli.hill@cityofsanrafael.org>; Maribeth Bushey <maribeth.bushey@cityofsanrafael.org>; Councilmember Rachael Kertz <rachael.kertz@cityofsanrafael.org>; Chief David Spiller <David.Spiller@cityofsanrafael.org>
Cc: Scott Eberle <475@srpd.org>; Lindsay Lara <lindsay.lara@cityofsanrafael.org>; Tammy Edmonson [REDACTED]
Subject: PAAC Recommendations for Equitable Policing in San Rafael

Dear Mayor Colin, City Council, Chief Spiller, and Police Advisory & Accountability Committee (PAAC),

[We are including the content of our attached letter in the body of this email for your convenience.]

Thank you again for inviting MVFREE to the May 20 PAAC meeting to demonstrate how San Rafael can employ the data and resources available under the Racial and Identity Profiling Act (RIPA) to achieve its equitable policing objectives. We appreciate the PAAC's careful consideration and adoption of the four RIPA-recommended strategies that we presented:

1. Adopt a RIPA informed bias by proxy policy and protocols to eliminate race-based calls for service which contribute to Black and Latinx stop disparities in San Rafael;
2. Implement a one-year pilot program eliminating pretext stops as recommended by the RIPA Board to significantly reduce Black and Latinx stop disparities in San Rafael;
3. Establish and monitor performance metrics for your equitable policing strategies using SRPD RIPA data; and
4. Conduct an annual RIPA equity assessment to map a course for continuous improvement and make the San Rafael Police Department a leader in safe and equitable policing.

MVFREE will be happy to help the PAAC present these recommendations to the San

Rafael City Council and to work with the PAAC, the City and the San Rafael Police Department to effectuate them. We look forward to hearing from the PAAC about next steps in this process.

We are enclosing some additional data that one of the PAAC members inquired about. Please feel free to contact us with any further questions.

Sincerely,

Tammy Edmonson
For the MVFREE Police Team



Enclosure

cc: For distribution to the PAAC
Lt. Eberle
Lindsay Lara

--

MVFREE • Mill Valley Force for Racial Equity & Empowerment



June 16, 2025

Honorable Mayor Colin
San Rafael City Council
San Rafael Police Chief Spiller
Police Advisory & Accountability Committee
San Rafael City Hall
1400 Fifth Avenue
San Rafael, CA 94901

Dear Mayor Colin, City Council, Chief Spiller, and Police Advisory & Accountability Committee (PAAC),

Thank you again for inviting MVFREE to the May 20 PAAC meeting to demonstrate how San Rafael can employ the data and resources available under the Racial and Identity Profiling Act (RIPA) to achieve its equitable policing objectives. We appreciate the PAAC's careful consideration and adoption of the four RIPA-recommended strategies that we presented:

1. Adopt a RIPA informed bias by proxy policy and protocols to eliminate race-based calls for service which contribute to Black and Latinx stop disparities in San Rafael;
2. Implement a one-year pilot program eliminating pretext stops as recommended by the RIPA Board to significantly reduce Black and Latinx stop disparities in San Rafael;
3. Establish and monitor performance metrics for your equitable policing strategies using SRPD RIPA data; and
4. Conduct an annual RIPA equity assessment to map a course for continuous improvement and make the San Rafael Police Department a leader in safe and equitable policing.

MVFREE will be happy to help the PAAC present these recommendations to the San Rafael City Council and to work with the PAAC, the City and the San Rafael Police Department to effectuate them. We look forward to hearing from the PAAC about next steps in this process.

We are enclosing some additional data that one of the PAAC members inquired about. Please feel free to contact us with any further questions.

Sincerely,

Tammy Edmonson
For the MVFREE Police Team



Enclosure

cc: For distribution to the PAAC
Lt. Eberle
Lindsay Lara

San Rafael Population and Stop Percentages

2023 SRPD RIPA Data Per 2025 RIPA Report
Census Bureau 2022 ACS 5-Year Data Table DP05

One of the PAAC members was interested in seeing a side-by-side comparison of the San Rafael population percentages and SRPD stop percentages. That information is included in the two charts below for overall SRPD stops and SRPD pretext stops.

This basic comparison allows us to see whether the percentage of stops for a particular racial group is disproportionately high or low relative to the population demographic. Column C in each of the charts reflects the ratio of stops to population for each racial group. This shows, for example, that White people are being stopped at a rate of .54 times their percentage in the population, while Black people are being stopped at a rate of 5.56 times their percentage in the population. (Disproportionately low stop rates are indicated in red, and disproportionately high stop rates are indicated in green.)

Population and Stop Percentages Compared

	A San Rafael Population %	B SRPD Stop %	C Stop Ratio (B/A)
White	62.4%	34.1%	.54
Asian	6.3%	3.2%	.50
Latinx*	33.5%	39.5%	1.17
Black	1.6%	8.9%	5.56
Other	unavailable	11.4%	unavailable

Population and Pretext Stop Percentages Compared

	A San Rafael Population %	B SRPD Pretext Stop %	C Stop Ratio (B/A)
White	62.4%	33.8%	.54
Asian	6.3%	2.8%	.44
Latinx*	32.5%	46.3%	1.42
Black	1.6%	13.0%	8.12
Other	unavailable	4.1%	unavailable

* The Census Bureau has struggled to accurately classify and count Latinx people due to the diverse nature of Latinx identity, which can encompass multiple races and ethnicities. For the Latinx population percentage in these charts, the Census has included people of any race who identify as Hispanic or Latino. (The other racial categories include only people who identify as a single race.) Due to this anomaly, the total of the population percentages slightly exceeds 100%.

But what we really want to know when assessing racial stop disparities is how stop rates for White people in San Rafael compare to the stop rates for each of the other racial groups. The RIPA Board's "ratio of disparity" formula, which divides the stop ratio for each racial group by the stop ratio for Whites, provides the answer.

As shown in the chart on the right, the ratio of disparity for SRPD pretext stops demonstrates that in San Rafael:

- Asian people are subject to pretext stops at 0.8 times the rate of Whites
- Latinx people are subject to pretext stops at 2.6 times the rate of Whites
- Black people are subject to pretext stops at 15 times the rate of Whites

	Ratio of Disparity SRPD Pretext Stops
Asian	0.8
Latinx	2.6
Black	15.0

We hasten to emphasize, once again, that this information should not be understood as an indictment of the San Rafael Police Department. These disparities are not unique to San Rafael but are consistent with the systemic disparities that are present in all Marin County law enforcement agencies and in over 90% of all California agencies. Many factors contribute to stop disparities, some of which have nothing to do with officer bias. For example, some offenses such as vehicle equipment infractions have an economic component that disproportionately impacts people of color due to the racial wealth and income gap in our community. Fortunately, RIPA provides targeted best practice strategies for eliminating policing disparities whatever their cause.

From: [Annette Lindemann](#)
To: [PAAC](#)
Subject: Submitting Public Comment for June 18, 2025 Police Advisory & Accountability Committee Mtg.
Date: Wednesday, June 18, 2025 11:50:47 AM

TO: Police Advisory & Accountability Committee
RE: Gerstle Park Picnic Area Rentals / Safety and Security
DATE: Wednesday, June 18, 2025

Our family's home is the property directly adjacent to the south end of Gerstle Park. My mother, who passed away in January, lived on this property for 98-1/2 of her 100 years. ■■■ Clark Street is the only family home I've known for my parents, and after 65 years of living next to Gerstle Park (or visiting/assisting my parents weekly after moving elsewhere in Marin), I value and cherish the park, the neighborhood, and the neighbors we regard as extended family. All of this compels me to submit a statement on behalf of our family.

Since the City decided to generate revenue by renting out the park's picnic areas to groups who may, or more likely may not, live in the Gerstle Park neighborhood, we've seen a significant increase in large, loud, alcohol-driven parties, "Jumpsies" and tents surrounding the basketball court, amplified music that can be heard 2 streets away from the picnic area, overflowing garbage cans, public urination, drug use in cars, lack of parking for residents & their guests, and a general disrespect for the park and residents who live directly adjacent to it.

When we and our neighbors call SRPD to alert them of violations to picnic area rental rules – drinking alcohol, blasting amplified music, smoking pot near the playground where children are playing, etc -- officers may come out (or may not, although recently officer presence has improved; we're grateful for that).

When officers do come out to address groups breaking rules of their rental agreement, they typically give a verbal warning – "pour out your beers...turn down the music" -- but don't issue citations for the violations.

As a result of "no consequence for breaking the rules," as soon as the officers leave, the music cranks up again, a partygoer runs to their truck for another case of beer or tequila, and everything returns to the state it was in before the officers appeared.

We understand there are tensions based in previous incidents with certain community groups that may have officers hesitant to confront people who break the rules. However, issuing citations for breaking rules is law enforcement, and can be done peacefully, non-confrontationally, and with respect to the people who deserve a consequence for willfully ignoring to comply with a rental agreement they've signed.

Citations are a consequential warning that the City DOES enforce its rules for renting park spaces and the neighborhood is paying attention. Citations are a serious reminder that it is a *privilege* to rent picnic areas in beautiful Gerstle Park -- not an entitlement to do whatever you want, regardless of what you agreed to.

There are other County park picnic areas that do allow alcohol because they don't flank playgrounds where children and families (who *live and pay taxes in the neighborhood*) are endeavoring to enjoy a relaxing afternoon. If a group wants to drink alcohol, they should be guided to rent space in parks other than Gerstle.

Public urination is also an issue, yet neighbors have been informed that unless an SRPD officer personally witnesses the act of urinating, they can't do anything about addressing it, even though we've all personally witnessed ongoing offenses. On any given weekend in which a large party occurs, I can walk out the back door of our family's house (which faces the hill and picnic area surrounding the basketball court) and commonly witness an adult (usually a male) or a child being led by a parent, peeing among the trees or sometimes right out in the open. One time I walked out on the back porch to bring garbage down to the bins and saw a man peeing on the hill near our

property's park-shared fence. He stood there and looked me in the eye as he continued; it was creepy. There is a public bathroom LITERALLY steps away at the other end of the playground, yet picnickers seem to think that hill, and shrubs along sidewalks surrounding the park, are free public toilets. No one wants to witness that from their home.

Since officers say they can't cite anyone for public urination unless they personally witness it, the City should provide (or require renters to supply) port-a-potties for large rental events. Better yet, re-open the upper restrooms in the park to help alleviate this problem. Even better yet, please stop renting the picnic areas to groups too large to wait in line for the public bathroom.

If our neighborhood & streets surrounding the park are patrolled regularly when large rental events are planned -- the City knows in advance when these occur thanks to the executed rental agreements -- and citations are issued to ruler-breakers, this negative behavior will diminish. Word will get around that Gerstle Park rules are enforced -- period.

Gerstle Park is a neighborhood gem intended for families and small groups to enjoy; that was the intention of the Bettini family when they gifted their property to the City. It was never intended to be a community center nor a revenue-generating enterprise. The City provides no staff to monitor the large parties they've booked, and law enforcement (so far) rarely if ever issues citations. We wish they would.

I represent a good number of neighbors who'd prefer that Gerstle Park rentals stop altogether, and that barbecue pits in playground picnic areas be removed permanently (blatant fire hazard; not all groups extinguish embers as they should). We'd like citations issued for alcohol, drug, and noise violations, and parties that are over-capacity.

Neighborhood residents will fully support law enforcement doing its job to keep peace in, and respect for, our beautiful park and neighborhood.

We appreciate your consideration, are grateful for your service, and hope to see increased patrol presence this summer. Thank you!

Annette Lindemann

█ Clark Street
San Rafael, CA 94901

█

From: [REDACTED]
To: [PAAC](#)
Cc: [REDACTED]
Subject: Comment on SRPD Hum Traff report and powerpoint
Date: Wednesday, June 18, 2025 1:12:52 PM

To the PAAC:

First, it's important to note that the purpose of this email is to place in a broader perspective what you will hear and see tonight from LE on this most emotional issue.

Note that both the report and the powerpoint, are bereft of local data. If you, as the PAAC, are to advise the SRPD and help them maintain accountability as per the title of this body, then you need data upon which to reflect. And that is a main point of this email—to direct your attention to scientific research conducted by academicians over the years on the area of human trafficking and sex work.

Such professors as Ron Weitzer of GWU in DC, Barbara Brents at UNLV in Las Vegas, Christine Chin of American University, and Ric Curtis at the John College of Criminal Law in NYC have produced data which provide an assessment of the industry far different from the media hype dramatically skewed towards the fomenting of fear. See especially Lutnick, 2016 in her Domestic Minor Sex Trafficking: Beyond Victims and Villains, wherein her exhaustive review of the literature shows that only 8% of young people trading in sex reported that someone else initiated their entry. And "Equally revealing about the low third party presence is that almost half said they did not know a single pimp." Overall, Marcus and Horning, et al (2014) found out that "stereotypical pimps are far less common and important to street sex markets than would be expected, given the popular discourse and the priorities of contemporary anti-trafficking institutions."

Please do note that the report is correct in saying that trafficking is difficult to define and identify. The nuance must be studied closely without bias. One definition is that any forced or coerced labor is trafficking. Whether the individual is stuck in a farm field, is a cowed employee in a corporate firm, or a man in the sex industry, they are all in trafficked situations. Laws are written vaguely—in fact, some law professors believe that laws are written vaguely on purpose so that they can be litigated to find out what the law actually covers.

An interesting example of nuance to note occurred when an 85 year old woman with a strong personality dominated a small local nonprofit, causing workers to feel afraid because she lost her temper over easily fixable and small mistakes. One male worker of 72 years of age in that group was cowed enough to take on tasks she assigned even though he ranked higher than the elder woman. Coerced labor is trafficking. That example also fits the definition of a hostile working environment.

Also note that there are two groups of people who are missing from the report: the first is sex workers who are willingly in the field, intimidated in the PowerPoint on page 4 where it says "victims of human trafficking – – not prostitutes." Also missing are statements from clients--it's incorrect to use disparaging terms such as "John" and "trick." Both are disrespectful not only to the client but also to independent providers. That strong bias can eliminate any objective view.

The report cited a UNICEF study with no direct link, but a Google AI search does indeed show that human trafficking is the second most profitable, illegal industry in the US. Again, we must be very careful as to what exactly is coerced or forced labor. Does that determination come from scientific data or estimates? And if scientific, how is it defined and thus collected? BTW, the FBI link doesn't go anywhere.

Of note in the report is the national human trafficking hotline, which has been debunked repeatedly by many academic and progressive think tank sources (Institute for Policy Studies), as well as online outlets such as the Anti-Trafficking Journal. The phrase "over 50,000 signals from California since its inception" provides no indication as to what those calls were about; there is no indication as to whether any of those were verified; and even Polaris, which runs that hotline, says "The signal may or may not translate to actual trafficking cases."

Thinking critically, the amount of 54,000 calls is meaningless without context. It's like saying that the SMART train is doing such a good job because it has served 1 million riders. When one places that number in context, it reveals only about 3000 people a day, and for an agency which bills itself as a commuter train, those numbers are paltry and expensive to the public—they are dwarfed by any other competent transit system, and by the 100,000 cars each weekday coming south on 101.

The report laments the passage of SB 357, but that new law helps people of color, particularly those providers who choose the street as their market. The street, by the way, while it's clearly the most visible form of marketing, is also the smallest part of the industry. Googling for a sex worker shows many more pages of individuals than who could be found on the street. And compare to the homeless population—it's the people on the street who are most visible and reviled by much of the public. The point is that focusing so much on one aspect of the industry can provide deeply misleading numbers coughed only in estimate which lead to incorrect conclusions.

Here's how SB357 works: if I have a condom or two in my pocket and I'm walking on the street on my way to my boyfriend's house, and I walk through an area where LE thinks trafficking is occurring, 357 keeps me

from being arrested.

The report further states that prostitution is "most prevalent" in the Canal area of San Rafael, but the next sentence either refutes or at least confuses this point: it says street-level sex workers are visible but technology has shifted much of this activity in the Canal online. Let's try to say that another way: sex workers have long been visible on Canal streets, and now they are using technology to walk there.

Victims are online, but so are sex workers who voluntarily ply their wares there. And, as sped above, there are far more independent sex workers than there are those who are coerced, by almost 90%. In fact, if you placed 100 underage sex workers in NYC a yard apart on a football field, goal to goal line, you'd have to walk almost 40 yards before you found a girl.

That paragraph states the obvious, which is that sex work occurs daily in the area, but given the conflation of hidden tech with visible street only estimates are available so it's difficult to advise LE what to do.

Locations are absent from the report, but easy to find.

The report claims that "Victims of human trafficking are now often advertised on underground websites." No identification of how often, which sites are used, and why those sites are "underground." There's no mystery: one need only google "escort San Rafael sex" and 7 or 8 low end sites pop up, (meaning it costs little to advertise on those, which is where the SRPD focuses their stings). The low end provider rates undercut the three main high end provider sites by at least 50% to 75% and more. This will figure in again later, when we discuss how SR conducts their prostitution stings.

The claim is made that victims are moved frequently from one county to another. No substantiation is provided as to how often this occurs, nor where in the county. But indeed, as the report sites, constant relocation is frightening and disorienting.

Again, you as a committee really ought to know how often this occurs here in San Rafael so that you can advise the PD.

The local anti-trafficking coalition is completely feckless--a couple/three years ago their website had a list of 10 data points, all of which were incorrect. When I wrote to them and to the county supervisors and showed how each point was incorrect (and, of course, unsubstantiated), those false statements were all scrubbed within a week. What remains is still unsubstantiated, and the posted wild ILO estimates, garnered by

newspaper clippings, do naught but purvey fear. Another insidious example that website uses is "stranger danger," of which very little actually occurs as per the FBI. In fact, the most child kidnapping occurs within the context of divorce proceedings. Lastly, the site also claims, without substantiation, that the Bay Area is a hub, but the word remains undefined and its seeing intent is to scare people.

Also on that page is a 3 year old article about a prostitution sting, which had nothing whatsoever to do with trafficking. As mentioned before, the use of low end websites used in stings means only people who can't afford the high end of \$500 per hour and up are attracted. As a result, as I have said perhaps here but for sure to the city council, 70% of the men nabbed in these stings here in San Rafael over the last 15 to 17 years are Latino. The response to that shocking and easily proved data point is that they aren't being singled out. While that might be true, relegating stings only to sites with low price points will nab those who can only afford to pay such, while rich white men use the high end web sites where women entirely on their own display their wares.

A final word on the Asian spas: the presumption of the report seems to imply that the women there are all trafficked. Given some of the profile points espoused in the powerpoint, that may look to be true. But at least four researchers found that not to be the case: Doogan, 2013; McNeill, 2014; Agustin, 2007; Frieman, 2014. Even worse, trafficking suspicion in the Asian spas spills over to the health practitioners in "legit" massage outlets—thus, the city has unfairly steeply raised biz fees by 30% in just a couple years or so, demands annual inspections even of the legit people who have practiced for decades, and unwisely demands that one code enforcement officer who comes in 4 times a month be responsible for preventing massage outlets from being used as fronts for prostitution and "related activities." This focus on 12 or 13 outlets negatively impacts the 55 or legit sole proprietors who struggle to earn a living.

The powerpoint:

The photo on the first page is sensationalistic. Almost all anti-trafficking awareness media has a sad-looking young girl. Given the comments above, it's misleading.

Page 2: Forms of trafficking:

— labor and sex. Is not all trafficking forced labor, no matter what the oppressed person does?

Determining the extent is very difficult, yes.

Page 3: Victims of Trafficking

Those "with vulnerabilities" could describe everyone—everyone has a vulnerability somewhere in their personality.

"Many" are underage—no number given of how many; underage undefined;

Page 4: Sex Trafficking:

- note the powerpoint seems to imply that prostitutes are not victims of trafficking.
- traffickers use violence, threats, etc, to “force” adults to participate in “commercial” sex acts
- while sex work is illegal—where two people contract to exchange a specific sex act for funds, porn is not, even though both workers are paid

Page 5: Sex Trafficker or Pimp

- different types are ID'd
- but what about women who run a house? Are they pimps. in the derogatory sense of the word? Rather, the term "market facilitator" can be applied.

Page 6: Solicitation

- online: how many are forced? Data?
 - Street: most visible form of marketing
 - Biz: massage outlets
 - the PAAC should ask how many parlors there are in SR
- Why use derogatory terms for clients?
- as per the victim v prostitute note from above, are those who buy sex from independent workers not johns?

Page 7: How Victims are Identified

- Street ID only
- ID'd are really bad cases

Page 8: How Traffickers are ID'd

- if I drive my Tesla past a street marketer could I be labeled a trafficker?
- some of the profile points on this slid and the previous slide sare found in many Hollywood movies

Page 9:

- Why here?
- supply and demand
- Who involved?
-
- Where?
- street only?
- When?
- all day, or when workers go to work
- SR PD
-

Page 10: Difficulties of Investigation ad Presoctiuon

- SB 357 saved lives
- Consensual Contact v Detention
- “Victims” is a derogatory word
- most refuse service — why?
- why do they claim that they're on their own?

— how many cases do we have here in Marin?

Page 11: Labor Trafficking

- the photo is of workers in a field: they might or might not be forced
- the examples are of massage outlets, and one of domestic workers

Page 12: Red Flags

- most of the examples are presume to be found in a massage parlor
- are they reflective of ALL kinds of trafficking?
- sensationalistic photo

Page 13:

- resources