



Understanding Police Brutality:
How Lack of Police Accountability
Leads to the Disproportionate
Abuse of African Americans
Maria Gonzalez

ABSTRACT*

Police misconduct, particularly police brutality (the use of excessive and unwarranted force), has become a systemic issue. Police brutality is being reported and documented at higher rates due to technology. Black communities are disproportionately affected by police brutality. However, police brutality is not being addressed even when sufficient evidence is present. The lack of accountability for police brutality has led to death and physical harm to many individuals, especially Black people. Thus, for this research paper, I investigate whether the lack of accountability explains why African Americans disproportionately experience police brutality. I found three potential reasons. First, violence against African Americans seems justified due to stereotypes that depict Black people as criminals, violent, and dangerous. Second, prosecutors are enabling police brutality as they protect police officers due to self-interest or fear of retaliation by police. Third, law enforcement agencies and police officers have used the code of silence and police immunity to evade accountability. With my findings based on statistical and qualitative analyses, I argue that these three factors explain how the lack of accountability for police brutality result in African Americans being disproportionately victimized by law enforcement.

INTRODUCTION

To serve and protect. That is the oath of duty police officers take. In theory, they are supposed to keep us safe. They are supposed to

* Thank you to Professor Gina James. An early version of this work was submitted as a final project for her course, CJ 330: Research Methods.

be our protectors, yet they are not. Police misconduct has become a systemic issue as many incidents have increasingly become documented through police officers' body cams, surveillance cameras, and phone recordings by bystanders and victims. Police misconduct is the unlawful actions or inappropriate conduct toward an individual the police officer has detained. Police misconduct can range from excessive force, police brutality, abuse of power, racial profiling, planting evidence, mishandling evidence, witness tampering, lying, and sexual assault, to name a few. For this research paper, I will specifically address police brutality, which is the use of excessive and unwarranted force.

Police brutality has led to the death and physical harm of many individuals. Because of the rise of police brutality and lack of reporting, The Washington Post has created a database that continuously reports and updates the numbers of individuals killed by police. Since 2015, The Washington Post was able to track 8,381 fatal police shootings, with 1,057 fatalities occurring in the past 12 months (WP Company, 2023). Police brutality has become an alarming problem, but it is not being addressed, as officers are not being held accountable for their misconduct. Worse, African Americans are particularly affected by police brutality.

According to The Washington Post database, compared to white Americans, Black Americans are more than twice as likely to be killed by police, even when they account for approximately 14 percent of the U.S. population (WP Company, 2023). Black people repeatedly suffer from police brutality even when their population is relatively low. Thus, my research will examine how the lack of accountability for police brutality plays a role in how African Americans are more susceptible to police brutality.

When conducting research, six peer-reviewed sources were analyzed to reveal three potential reasons for the absence of

accountability for police brutality and why it disproportionately affects African Americans. First, my research examines the notion of “justifiable force” as it is used to legitimize violence against African Americans. “Justifiable force” is deeply rooted in stereotypes of African Americans being criminals, violent, and dangerous, which can explain why African Americans are often the targets of police brutality. Second, my research examines how prosecutors enable police brutality due to prosecutors’ self-interest or fear of retaliation by police. Prosecutors are influential players in the criminal justice system who can decide whether or not to indict police officers for their misconduct. They not only have the power to determine who to indict but also decide and influence the severity of the punishment. Finally, I will examine how the code of silence and police immunity explains police officers’ ability to evade personal liability for acts of brutality. Put simply, laws and unwritten rules shield police officers from being held liable for police brutality. My research is based on statistical and qualitative analyses which indicates that these three reasons can explain the absence of accountability and the fact that police brutality is not being addressed, which helps explain why African Americans remain disproportionately victimized by law enforcement.

LITERATURE REVIEW

Justified Violence Against African Americans

The kidnapping and enslavement of Africans was made possible with the justification that Black people were not human but rather inferior creatures who were animal-like and could be enslaved and kept as property to be exploited. The removal of their humanity justified the hundreds of years of bondage, rape, torture, lynching, and killings. The notion of Black people being inferior and more

animal-like than human became a stronger sentiment after the emergence of scientific racism.

Scientific racism, also referred to as biological racism, was a period when scientists had theories that explained and justified racial hierarchies. Scientists such as Carl Linnaeus, the “father of modern taxonomy,” created the first hierarchal classification system where he named, ordered, and ranked living organisms, including humans. He was the first to classify humans as *homo sapiens* and he separated humans into four categories: *Americanus*, *Asiaticus*, *Africanus*, and *Europeanus*.

Johann Friedrich Blumenbach was another scientific racist who, like Linnaeus, categorized humans into five categories: *Caucasians*, *Mongolians*, *Ethiopians*, *Americans*, and *Malays*. Both Linnaeus and Blumenbach categorized and ranked humans based on their different physical traits, which according to them, was due to environmental differences. These differences would create racial distinctions and a racial hierarchy where one race was superior to the others. Linnaeus and Blumenbach would place *Caucasians* and *Europeanus* (white people) on top of the racial hierarchy due to their supposedly desirable traits and morals, while *Africanus* and *Ethiopians* (Black people) were at the bottom due to their “unpleasant” physical features and purported lack of morals.

These scientific racists utilized very demeaning language when explaining Black people’s traits, while they marveled about how beautiful and intelligent white people’s traits were. Linnaeus and Blumenbach would pave the way for other scientists to further look at racial differences that expanded beyond physical traits. Their work would contribute to the birth of criminology, where scientists such as Cesare Lombroso and Frederick Hoffman claimed that certain physical traits found among Black people made them criminals.

White supremacy also emerged from scientific racism, thrusting and solidifying white people's position on top of the racial hierarchy, leaving Black people at the bottom of the hierarchy. While scientific racism has many complexities to it, what it achieved was justifying Black people's inferiority and thus justifying the violence against them. The notion that Blacks are inferior and criminal legitimized violence against them—we have seen this throughout history with Jim Crow, the War on Drugs, and now police brutality. It is why we see over and over again white police officers get away with physically harming and killing unarmed Black people who, most of the time, had done nothing wrong but be born Black.

The belief that African Americans are inferior was strengthened throughout the period of scientific racism, a belief that keeps being perpetuated until today. As a result, Black people are more susceptible to police brutality as the belief of Black people's inferiority, and later on, their supposed criminality justified the violence against them. As a result of these beliefs, African Americans are constantly stereotyped as criminals, violent, and dangerous, exposing them to more police contact.

A report by the Public Policy Institute of California revealed that Black residents in California are 16 percent more likely to be stopped by police. The report also found that despite having less than 6 percent of California's population, Black Californians account for nearly 20 percent of injuries and fatalities at the hands of police (Premkumar et al., 2021). African Americans' increased exposure to police contact raises the likelihood that police officers will use violent force deemed necessary and appropriate due to these stereotypes. Furthermore, increased exposure to police contact increases the probability and rate of incarceration for Black people.

Devon W. Carbado (2016), Professor of Law at UCLA School of Law, argues that these stereotypes not only increase police contact but also help maintain these stereotypes, strengthening the perception that Black people are criminals, violent, and dangerous. Thus, when African Americans experience police brutality, it is often assumed to be justified because they are presumed to be “criminals,” “violent,” and “dangerous” people that must be treated accordingly—meaning the use of excessive and unwarranted force. Unfortunately, these stereotypes have informed how police officers interact with African Americans, increasing the likelihood of Black people experiencing police brutality.

For instance, the same report by the Public Policy Institute of California revealed that “Black people who are stopped by police are over 3.2 times as likely (i.e., over 220% more likely) to have an officer aim or discharge a firearm at them than whites” (Premkumar et al., 2021, para. 51). Moreover, an article on police brutality and racial bias found two studies that indicated Black men are 2.5 times more likely to be killed compared to white men and Black people that were fatally shot were more likely to be unarmed compared to white people (Peeples, 2020). These studies have shown that African Americans are more susceptible to police brutality as violence against them has become justified due to stereotypes, which might also explain why there is virtually no accountability for police brutality.

All this begs the question, how can you keep police officers accountable for police brutality when the conduct is presumed to be justified? The lack of accountability for police brutality further perpetuates violence against African Americans, and if it is not penalized or corrected, it will continue. The next section suggests police brutality will continue because the state does not prosecute

police officers' misconduct in order to keep certain relationships and reputations intact (Trivedi & Van Cleve, 2020).

Prosecutors Enable Police Brutality

A 2010 study identified almost 8,300 misconduct allegations involving over 11,000 officers. Of those accusations, only 3,238 led to any legal action, and only 33% were convicted. In another study in 2017, 72% out of 8,000 sworn police officers did not believe police officers who consistently did a poor job were held accountable (Fischer-Baum, 2014; Morin et al. 2017, as cited in Trivedi & Van Cleve, 2020). These studies concluded that misconduct cases are hardly convicted, nor do police officers themselves believe officers will be held accountable for misconduct. In this review of literature, I found that prosecutorial discretion can explain this phenomenon.

Prosecutors are powerful players in the criminal justice system as they have the discretion to choose who to indict, the type of offense to charge, and suggest the duration and severity of the penalty. Prosecutors are known to protect police officers from being held responsible for police brutality and other misconduct through plea bargaining or by not bringing any charges. Prosecutors protect police officers from liability for two reasons: self-interest or fear of retaliation by police.

For one, prosecutors hardly want to prosecute police officers due to self-interest, as prosecutors greatly need police officers to do their job: "Prosecutors ostensibly protect police so that police can bring in and help convict more cases, thereby— theoretically—increasing public safety" (Trivedi & Van Cleve, 2020, p. 912). Prosecutors need police officers as they provide information and evidence needed to convict cases. Prosecutors also need police officers to testify in court to help prosecutors make

their cases and increase the chance of winning, as police officers are considered reliable and star witnesses. There is a dependency between prosecutors and police officers. Both need each other to improve public safety and thus maintain their position of power. In the case of prosecutors, the more cases they win implies better performance and, in turn, increases the likelihood that prosecutors get reelected. Prosecutors, therefore, protect police officers as they need the wins to get reelected and maintain their power.

The second reason prosecutors protect police officers from liability for police brutality is due to the fear of retaliation by police. Law-enforcement agencies and police officers control the streets and thus the cases and the narrative in courts. Prosecutors depend on police officers to tell the story of what happened as they are considered star witnesses (Trivedi & Van Cleve, 2020). If prosecutors do not align with police officers' demands, prosecutors do not get the support of the police that is greatly needed to convict cases. In that sense, police officers have created a culture of silence that if prosecutors do not play nice with police officers, they will retaliate.

Retaliation is in the form of police officers “forgetting” court appearances, withholding information, or police officers working with other prosecutors who are more compliant with police culture (Trivedi & Van Cleve, 2020). Police culture has, in turn, instilled fear in prosecutors. Not wanting to be on the wrong side of law enforcement or lose their next election, many prosecutors refuse to hold police officers accountable.

Prosecutors not holding police officers accountable offers another explanation as to why African Americans are disproportionately targeted by police. Police officers are able to use police brutality against African Americans as they know prosecutors will shield them from prosecution through plea

bargaining or no indictment. Not only are police officers justifying their excessive and unwarranted force against African Americans, but prosecutors are further justifying and enabling the force by not sanctioning the violence. Police brutality will continue if prosecutors do not address and sanction the behavior. What's more, police culture has proven to be a shield that protects police officers from liability.

Shielding Behind the Code of Silence and Police Immunity

The code of silence, which is a big part of police culture, shields police officers from liability. Teressa Ravenell (2022), a professor at Villanova University's Charles Widger School of Law argues that:

Today, the code of silence protects officers who violate civil rights through violence and other misconduct. Additionally, the blue wall sometimes requires that officers not just stand mute, but that they lie to protect their fellow officers. (p. 907)

The code of silence, also known as the blue wall, is an unwritten rule among police officers that requires police officers to have the backs of other officers by keeping quiet or lying about their misconduct. The code of silence heavily relies on a brotherhood culture that creates a sense of unity, trust, and loyalty making police officers more likely to protect each other. Police officers are firmly loyal to one another because trust and loyalty are seen as essential for police officers to be effective and put themselves in harm's way (Ravenell, 2022). The code of silence has permitted police officers to keep quiet and lie about misconduct that violates fundamental rights.

One of the ways law enforcement agencies and police officers have been able to use the code of silence is by not

disclosing data. In 2022, The FBI collected use-of-force data from 8,046 out of 18,514 federal, state, local, and tribal law enforcement agencies (Federal Bureau of Investigation, 2022). In other words, less than 45% of law enforcement agencies provided use-of-force data to the FBI, and around 55% of law enforcement agencies did not wish to participate in the data collection. That means more than 10,000 law enforcement agencies did not want to disclose or be transparent about their practices, nor were they compelled to disclose their data as it was not mandatory.

The code of silence permits police officers to withhold information to protect themselves. The code of silence is a tactic heavily ingrained in police culture that prevents officers from being held liable for misconduct such as police brutality. Not only are prosecutors protecting police officers from liability, but police officers are protecting themselves through their silence. Thus, no one in the criminal justice system is truly addressing police brutality and the disproportionate victimization of African Americans.

Additionally, qualified immunity is another reason police officers are not held liable for police brutality, as it shields them from being sued—leaving African Americans or anyone who experiences police brutality with little hope for justice. Qualified immunity protects police officers from liability for civil lawsuits. In cases of police misconduct, it is hard to sue police officers unless it violates a clearly established constitutional right. Courts have made it easy to grant qualified immunity because they “. . . avoid deciding the question of whether the officer's conduct violated the Constitution and rule instead on whether the constitutional right in question was clearly established" (Carbado, 2016, p. 1520). In other words, courts have refused to examine whether police conduct violates the Constitution, giving officers more leeway to

argue that their conduct does not violate any constitutional rights. The court's refusal to examine whether police conduct violates the Constitution is due to the current system that checks police power, which is thought to be effective.

Law enforcement fear what can come from engaging in police brutality or other violent conduct, which is great financial loss (Carbado, 2016). Fear of costly civil lawsuits disincentivizes police officers from engaging in police brutality and other misconduct. However, the reality is that the fear of costly civil lawsuits does not deter police officers from engaging in police brutality. Successful civil lawsuit cases against police officers almost always end with indemnification. Indemnification is when police officers' employers, that is taxpayers and police departments, are the ones paying out the settlements rather than the officers themselves. Carbado (2016) argues that "Combining qualified immunity with indemnification creates a world in which plaintiffs rarely win cases against police officers (because of civil liability protection that qualified immunity affords), and when plaintiffs do win, police officers suffer no financial consequences (because of financial liability protection that indemnification affords)" (p. 1523). In other words, qualified immunity already makes it virtually impossible to bring cases against police officers, and even when lawsuits against police officers are successful, police officers are still not held accountable as they are not receiving the financial punishment.

What's more, when courts must decide whether to grant qualified immunity, they almost always grant immunity to police officers. An analysis of qualified immunity found that "In 10 out of 13 cases involving excessive force claims, three out of five unlawful warrant execution claims, and nine out of 10 unlawful warrantless searches and arrests claims, the Court granted police

officers' qualified immunity" (Braaten & Vaughn, 2023, p. 88). In order to successfully defeat the defense of qualified immunity, plaintiffs must identify cases where courts have ruled against the officer in similar circumstances. Plaintiffs must not only prove a violation of a clearly established constitutional right, but they must identify precedent cases with similar circumstances to defeat the defense of qualified immunity. These standards make it challenging for victims of police brutality to win a civil lawsuit, thus offering more protection to police officers.

All this offers another explanation as to why we don't see accountability for police brutality. The justice system is shielding police officers, with prosecutors, judges, and police officers all playing a role in preventing police accountability for police brutality. All these hurdles make it impossible for African Americans to receive justice for police brutality, sending a message that violence against Black people or anyone who experiences police brutality will go unpunished.

OPPOSING VIEW: REPORTING SEVERE CONDUCT

Sanja Kutnjak Ivković et al. (2018) conducted a survey on 11 police agencies on the Midwest and East Coast of the United States. The survey was performed on more than 600 sworn officers in an effort to measure police integrity. The survey consisted of 11 questions about different scenarios of police misconduct, with seven questions measuring the severity of the scenarios, the appropriate and expected discipline, and their willingness to report misconduct (Ivkovic et al., 2018). The survey examined how the code of silence, which prevents police officers from "ratting" out other police officers, is a reason police officers are reluctant to report misconduct and why police agencies have maintained high integrity. The survey found that police officers are likely to report

severe conduct. For instance, the scenarios of using unjustifiable deadly force and falsifying drug possession reports were more likely to be reported (Ivkovic et al., 2018). This indicates that if police officers are more likely to report unjustifiable deadly force and the falsification of drug possession reports, then it is likely that excessive and unwarranted force will be reported.

However, one of the shortcomings of this survey is that the sample size was too small to accurately predict whether certain misconduct will be reported. A bigger sample size is needed to conclude that misconduct, in this case, police brutality, will get reported. Additionally, the survey found that if the punishment for misconduct is severe, it is less likely the misconduct will be reported (Ivkovic et al., 2018). The fear of getting other fellow officers penalized for their misconduct can deter officers from reporting. Hence, what does that say about police brutality? The punishment for police brutality is typically a civil lawsuit, that if lost, can be costly. Therefore, police brutality might go unreported, as the punishment for that conduct can be expensive.

PROPOSED RESEARCH METHODS

Police brutality has become an issue widely affecting African Americans that is not being addressed, as police officers who participate in such misconduct are not held accountable. Through my literature review in understanding police brutality and how it disproportionately affects African Americans, I found little statistical data on the reporting of police brutality. Only statistical data found on police brutality is dated back to the early 2000s and does not accurately reflect the current issues with police brutality.

The most recent data on police brutality comes from the FBI, but the data is incomplete as more than 55 percent of all law enforcement agencies in the United States did not participate in the

report. Due to the lack of reporting, the FBI may shut down the database, potentially limiting the little data available on police brutality. With limited data available on police brutality, we cannot accurately understand how African Americans and other racial and ethnic groups are being affected by police brutality.

My proposed research methods would set out to collect data on police brutality by gathering data from law enforcement agencies and other organizations to better understand the gravity and seriousness of police brutality. I plan on requesting information from law enforcement agencies since they have been unwilling to release their reports. I also plan on collecting data from alternative organizations that might have data on police brutality. Finally, I plan on surveying different communities of different races, ethnicities, and economic backgrounds to see at what frequency people in those communities are experiencing police brutality. I want to see how frequently people experience police brutality and potentially reveal other groups affected by police brutality that we have yet to learn about.

My proposed research methods would hopefully uncover at what rate African Americans experience police brutality and whether other races and ethnic groups also experience police brutality at high rates. The data collected will hopefully also give a better understanding of the level of police brutality happening in this country, as little data is available to fully comprehend the gravity and seriousness of police brutality. Police brutality is an existing problem, specifically affecting African Americans, yet not enough information has been released or reported on about the frequency and seriousness of this misconduct. If we want to find solutions for police brutality, we must better understand how police brutality works, who it is affecting, and at what rate.

DISCUSSION

Summary of Findings

The primary objective of this research was to understand why police brutality is not being addressed and whether it explains why African Americans are likely victims of police brutality. My research found that African Americans are more likely to experience police brutality due to stereotypes that claim they are inferior and presumptions that they behave in dangerous, violent, and criminal ways. These myths influence and explain why police officers treat Black people in a threatening and hostile manner and helps explain how police brutality is justified in the eyes of the criminal justice system. Also, my research revealed that police officers are less likely to be prosecuted for police brutality due to the prosecutorial discretion offered to them by prosecutors who need police officers to do their job. Finally, my research found that qualified immunity and the code of silence further prevent police officers from being held liable for police brutality as both shield officers from accountability.

My findings suggest that race plays a role in who is likely to be a target of police brutality, indicating that African Americans are the main targets. However, the lack of accountability for police officers who engage in such misconduct raises the likelihood that African Americans will continue to be disproportionately brutalized by the police. That is because no one is keeping police officers accountable for police brutality, meaning they will continue to engage in that behavior until they are penalized. They have the freedom to exercise their power with impunity on whoever they wish and until someone regulates their power and holds them accountable, police brutality will continue to occur, and the Black population will continue to suffer.

Practical Implications

To create more accountability for police brutality, leveling the playing field in the courts would be an ideal solution as it would give plaintiffs a chance to win. Qualified immunity makes it impossible to hold officers accountable in civil cases, especially when plaintiffs have many more hurdles to prove.

If police officers lose their civil cases, they should be held responsible for some portion of the financial settlement rewarded to the plaintiff. Adding the financial penalty that comes out of the pocket of police officers instead of their employers would dissuade them from engaging in police brutality.

Moreover, in criminal prosecutions, an independent prosecutor with no relation to police officers should be handling cases against police officers. Having an independent prosecutor will remove the bias that regular prosecutors tend to have over police officers. It would mean prosecutors would no longer be able to shield police officers from being held liable. These potential solutions would bring more accountability for police officers who engage in police brutality while also deterring them from engaging in misconduct.

This essay should encourage organizations to want to propose solutions for more accountability for police brutality. Not only are people experiencing police brutality getting physically harmed, but they are getting killed with impunity. Specifically, African Americans are most affected by police brutality as they are unjustifiably targeted. These injustices can be resolved with the help of organizations that can lobby for legislative change. New policies that focus on holding police officers accountable is much needed. We can no longer rely on prosecutors or judges to hold police officers accountable. It is up to the public and organizations to stand up against police abuse and keep their power in check.

Lastly, this essay should encourage scholars to conduct more research on the implications police brutality has on communities and distinct races and ethnic groups. More research is needed to understand how frequently police officers engage in police brutality and whether they are held accountable.

Gap in the Literature

When conducting research for this essay, I had a hard time finding current statistical evidence that showed how often police officers are being held accountable for police brutality. I found one source with statistical data from 2010 that revealed how many individuals filed lawsuits against police officers and how many of those cases got convicted. There is limited data on how many police officers have been sued, convicted, or received plea bargains for police brutality. I would have wished that more statistical data was available to visualize how many people are not only experiencing police brutality but are pursuing legal action against police officers and how often those cases end in convictions or plea bargains.

In my literature review, one article mentioned how hard it is to find information about police officers that take plea bargains for police misconduct as “...the plea process erases police misconduct via charge bargaining, appeal waivers, and Heck preclusion, among other strategies” (Trivedi & Van Cleve, 2020, p. 917). Plea bargaining essentially can erase police misconduct with various strategies, such as prosecutors dropping charges related to the misconduct. Prosecutors are making it difficult to see whether police officers were, in fact, guilty of police brutality. We cannot accurately predict who is guilty of police brutality as plea-bargaining has “whitewashed” police misconduct (Trivedi & Van Cleve, 2020).

Importance of Studying this Gap

It is critical to know more information about how many police officers are sued, convicted, or offered a plea bargain to understand the rate police officers are being held accountable for police misconduct. Understanding how many police officers were sued, convicted, or took plea bargains will reveal whether the justice system is effectively working on punishing wrongdoers. It would also reveal whether the criminal justice system keeps police power in check. Lastly, this information would uncover the many cases of police brutality that were concealed via plea bargaining. It would reveal cases where charges were dropped or adjusted to hide and minimize police misconduct.

Future Study

A potential future study would incorporate analyzing secondary sources such as public court and police reports and news articles to reveal how many police officers have been accused of police brutality in the Bay Areas' largest police departments. Not much information is available on how many police officers have been accused of police brutality, as privacy laws allow police departments to withhold information. Thus, there is no concrete number of how many police officers have engaged in police brutality. With the use of public court and police reports and news articles, I will try to piece together a database with a rough estimate of the number of police officers who engaged in police brutality in the biggest police departments in the Bay Area.

CONCLUSION

As discussed above, justified violence, enabling prosecutors, the code of silence, and police immunity are a few reasons for an absence of accountability for police brutality and why African

Americans remain disproportionately victimized by police officers who engage in police brutality. Stereotypes about African Americans have informed and justified the violence against Black people. The label of being criminals, violent, and dangerous has dictated the treatment of African Americans by police officers, making them more susceptible to police brutality. Moreover, prosecutors are failing to prosecute police officers who engage in police brutality due to self-interest or fear of retaliation. Police officers are of value to prosecutors as they need them to win cases to maintain their jobs. Thus, winning cases and reputations are more important for prosecutors than addressing police brutality. Lastly, the code of silence and police immunity protects police officers from being held accountable for police brutality. Police officers shield themselves through the code of silence, which requires police officers to stay silent or to lie about any misconduct because loyalty and trust are important in police culture. Qualified immunity also shields police officers, as it protects police officers from liability, and even if they are held liable, police officers do not pay the financial obligation. All in all, accountability for police brutality does not seem to be happening from any side of the criminal justice system.

References

- Braaten, C. N., & Vaughn, M. S. (2023). Police Officers' Qualified Immunity in Excessive Force Claims, Warrant Execution, and Warrantless Searches and Arrests: Tracing the Evolution of, and Stagnation in, U.S. Supreme Court Precedents. *American Journal of Criminal Justice: AJCJ*, 48(1), 65-95. <https://doi.org/10.1007/s12103-021-09617-w>
- Carbado, D.W. (2016). Blue-on-black violence: A provisional model of some of the causes. *The Georgetown Law Journal*, 104(6), 1479–1529.
- Federal Bureau of Investigation. 2022. *Use-of-Force [data set]*. <https://crime-data-explorer.app.cloud.gov/pages/home>

- Ivkovic, S.K., Haberfeld, M., & Peacock, R. (2018). Decoding the Code of Silence. *Criminal Justice Policy Review*, 29(2), 172-189.
- Peebles, L. (2020). What the data say about police brutality and racial bias -and which reforms might work. *Nature (London)*, 583(7814), 22–24.
<https://doi.org/10.1038/d41586-020-01846-z>
- Premkumar, D., Gumbs, A., McConville, S., & Hsia, R. (2021). *Police use of force and misconduct in California*. Public Policy Institute of California. <https://www.ppic.org/publication/police-use-of-force-and-misconduct-in-california/>
- Ravenell, T. (2022). Unidentified police officials. *Texas Law Review*, 100(5), 891-939.
- Trivedi, S., & Van Cleve, N. G. (2020). To Serve and Protect Each Other: How Police-Prosecutor Codependence Enables Police Misconduct. *Boston University Law Review*, 100(3), 895–933.
- WP Company. (2023). *Fatal force: Police shootings database*. The Washington Post.
<https://www.washingtonpost.com/graphics/investigations/police-shootings-database/>