

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF THE VIRGIN ISLANDS

UNITED STATES OF AMERICA,)	
)	C.A. No. 3:08-CV-158
Plaintiff,)	
)	
v.)	
)	
1. THE TERRITORY OF THE VIRGIN)	
ISLANDS; and)	
)	
2. THE VIRGIN ISLANDS POLICE)	
DEPARTMENT,)	
)	
Defendants.)	

**AMENDED REPORT REGARDING DEFENDANTS’
PROGRESS TOWARD ACHIEVING COMPLIANCE
WITH NOVEMBER 21, 2014 QUARTERLY GOALS**

Comes now Plaintiff, the United States of America, and submits this amended report regarding Defendants’ progress toward meeting its Consent Decree goals for the quarter ending November 21, 2014. Plaintiff files this amended report in order to address concerns raised by Defendants in their Status Report filed December 3, 2014, Dkt. # 128-1. Plaintiff files both a clean and a redlined version of this amended report so the Court can clearly see changes to the report made since it filed its initial report on December 3, 2014, Dkt. # 127-1.

Among other measures, this amended report: clarifies the assessment of the Audit & Inspection Unit; explains why the report is not limited to quarterly goals; offers additional explanation regarding findings of “partial compliance” and “not in substantial compliance;” provides more detail regarding impediments to compliance; and supplements sections regarding actions Defendants have taken.

Respectfully submitted,

FOR THE UNITED STATES:

December 10, 2014

JONATHAN M. SMITH
Chief
Special Litigation Section
Civil Rights Division

LAURA L. COON
Special Counsel

/s/ T. Jackson Morse
T. JACKSON MORSE
MARINA MAZOR
Trial Attorneys
Special Litigation Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
(202) 305-4039 (telephone)
(202) 514-0212 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that a copy of Plaintiff's Amended Report Regarding Defendants' Progress Toward Achieving Compliance with November 21, 2014 Quarterly Goals was filed electronically on December 10, 2014, using the CM/ECF system, which will send electronic notification to the following:

Carol Thomas-Jacobs
Assistant Attorney General
V.I. Department of Justice
34-38 Kronprindsens Gade
G.E.R.S. Complex, 2nd Floor
St. Thomas, Virgin Islands 00802
Tel: (340) 774-5666 ext. 155
CJacobs@doj.vi.gov

/s/ T. Jackson Morse
T. JACKSON MORSE
Senior Trial Attorney
Special Litigation Section
Civil Rights Division
United States Department of Justice