

## **Comment of JusticeText**

Public Interest Comment on the National Telecommunications and Information Administration (NTIA) Dual Use Foundation Artificial Intelligence Models with Widely Available Model Weights Request for Public Input

Regulations.gov Docket No. NTIA-2023-0009

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Thank you for the opportunity to comment on this important matter. I'm Devshi, the co-founder and CEO of JusticeText, a startup that helps public defenders review body camera footage in service of a more equitable justice system

This comment is most relevant to questions 3(c) and 9 of the Request for Public Input.

### **JusticeText Vision and Impact**

JusticeText started as a school project in 2019 by two computer science students at the University of Chicago. The students were outraged by the dashcam video of the murder of Laquan McDonald – an unarmed 17-year old Black American who was shot sixteen times by Chicago police. They cold-called their local public defenders to find a way to build technology that centered the needs of communities most directly harmed by over-policing.

JusticeText is a software platform designed to improve criminal justice outcomes for low-income defendants by automatically flagging critical moments across hours of body-worn camera footage, interrogation videos, and jail calls.

The software leverages speech recognition algorithms to automatically transcribe digital discovery in a matter of minutes. It provides attorneys with a centralized platform to take time-stamped notes, create video clips, and collaborate with their colleagues. JusticeText also uses natural language processing (NLP) to automatically identify key moments across police interactions (like a reading of Miranda rights), summarize each piece of evidence, and utilizes Large Language Models (LLMs) to allow attorneys to ask freeform questions about their discovery ("Were any weapons mentioned in this file?").

This work is especially critical today as police departments have invested more than \$100M in rolling out body cameras, dashboard cameras, and other video surveillance tools. While in theory all of this data can shed light on discriminatory practices, an increasing body of evidence proves that cameras alone rarely shift practice, due to limited internal accountability within police departments and barriers to public disclosure.

Instead, body worn cameras and the data they collect becomes just another tool used to surveil the community they were intended to serve.

Public defenders are uniquely positioned to take advantage of this data. They represent, and stand with, the majority of people accused of a crime in the US and – due to Brady disclosure laws which mandate prosecutors to turn over exculpatory evidence to defense counsel – they have exceptional access to body camera footage. However, they rarely have the time and the tools needed to fully leverage this evidence.

Due to systematic underfunding, public defenders typically have 3x as many cases as they can effectively handle. As a result, there simply isn't time to review all of this new evidence. A 2019 survey of Virginia's public defenders revealed that a staggering 93% of them found difficulty finding time to review all the videos in their cases. In addition, while there's a plethora of technology built for law enforcement, there is a severe lack of technology built for public defenders, leading to a significant access to technology gap.

This lack of time and technology inhibits the ability of disproportionately poor BIPOC clients to access a fair chance at the criminal justice system and minimizes a potential opportunity for video evidence to encourage more equitable policing. This is why we are building JusticeText.

### **Impact of Open Source Software on Equity in Criminal Justice**

Open source software is, and will continue to be, critical to our work at JusticeText. Like many software providers, our codebase relies on a wide range of open source libraries, upon which we've built the JusticeText platform. As an early-stage startup, these open source tools help level the playing field with large highly-resourced companies that often prioritize the needs (and revenue potential) of law enforcement at the expense of the public defenders, who stand with communities most impacted by the justice system.

Beyond these core libraries, we primarily use three main categories of AI tools to power JusticeText today: Automated Speech Recognition (ASR), Natural Language Processing (NLP), and Large Language Models (LLMs). Across these categories, we deploy a mix of both closed and open source tools to create the best possible experience for the public defenders we serve, in order to maximize the positive impact on the criminal justice system. Critically, the diversity of options available between open source and closed source models gives us the flexibility to identify and build upon the best available tools – especially in a quickly evolving environment.

For example, body camera footage is uniquely difficult to transcribe given the amount of background noise (wind, sirens, etc.) and cross-talk in sometimes heated exchanges. An ASR engine that's built to transcribe Zoom meetings in contained environments might not

generalize well to the criminal justice context. Allowing a mix of open-source and closed-source builders to compete to build the best foundational models, gives us the best chance to build effective tools and achieve greater equity in the criminal justice system.

In addition, open source models have the distinct advantage of allowing us to adapt existing tools to our unique context. For example, we've used open source semantic search models to build the capability to identify key moments – like a reading of Miranda Rights – in the footage that public defenders review. Given the bespoke, context-specific nature of these types of moments, no existing closed source tool could do this out of the box. Instead, by training open source models to spot these moments through many examples, we've been able to deploy these custom tools and save public defenders hours in the process.

## **Conclusion**

Overall, we believe that open source development, including open source AI models, can be critical tools for advancing human rights and equity in systems like the criminal justice system. We're most able to support the public defenders we serve with a healthy ecosystem of foundational tools and models, including open-source models, that we can build upon and apply toward this mission. Thank you for the opportunity to share our comment on this matter.