



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PESO CHAVEZ, etc., et al.,

Plaintiffs,

v.

No. 94 C 5307 Judge Manning

THE ILLINOIS STATE POLICE, et al.,

Defendants.

STATE OF FLORIDA
COUNTY OF LEON

AFFIDAVIT/ PRELIMINARY EXPERT REPORT OF LOU REITER

I, Lou Reiter, depose and say the following:

1. I am a former Deputy Chief of Police of the Los Angeles Police Department. I served as a police officer in the Los Angeles Police Department for over twenty years until I retired in 1981. During that period of time I served as a patrol and traffic officer, supervisor, manager, command officer and executive staff officer. I was involved in police training, investigating allegations of police misconduct, Chairman of the Use of Force Review Board, member of the Unusual Occurrence Command Post Cadre, and researcher and author of the chapters on internal discipline, training and management/employee relations for the Police Task Force Report of the National Advisory Commission on Criminal Justice Standards and Goals. In 1993 (Second

Edition 1998) I published the manual/guide Law Enforcement Administrative Investigations, and, in 1996, "Creating Reasonable and Defensible Discipline," CALEA Newsletter.

2. Since 1983 I have been providing law enforcement consultation in police training and management. I provide law enforcement training in the following areas:

- Investigation of critical incidents - officer involved shootings, use of force, and pursuits.
- Managing the Internal Affairs function.
- Police discipline.
- Use of force and deadly force issues.
- Police pursuit issues.
- Investigative procedures and supervision.
- Jail intake procedures
- Personnel practices.
- Supervisory techniques.
- Liability management.
- Policy and procedure development.
- Management effectiveness.

I consult with police departments of 3 to 12,000 employees, performing internal audits for the police organization. My primary areas of focus during these audits are:

- Citizen complaint procedures.
- Discipline, internal affairs and early warning systems.
- Personnel practices including selection, hiring, EEOC/AA, promotion, assignment and retention.
- Specialized operations including traffic, investigations, narcotics, vice, intelligence, emergency response teams and unusual occurrence units.
- Organizational structure and command responsibilities.
- Police department governance.
- Policy and procedures development.
- Use of force policy and procedures.
- Investigation of critical incidents.

3. Since 1983, I have been retained in over 600 police related cases. This

involvement has been on a mix of approximately 2/3 plaintiff and 1/3 defense.

Assistance provided includes case analysis and development and expert witness testimony. I have been qualified in state and Federal courts, including the District of Columbia and Puerto Rico, to provide trial testimony in many areas including: __

- Field procedures including tactics, arrest techniques and pursuits.
- Standards of police misconduct investigations.
- Use of force and deadly force.
- Supervision.
- Investigative procedures.
- Jail intake procedures
- Police management and personnel practices.
- Investigation of citizen complaints and discipline.
- Police policy and procedures development.
- Police training.

A complete list of my testimony during the past four (4) years is attached.

4. My experience, training and background is more fully described in the attached resume.

5. I have reviewed the following materials to date regarding this case:

- Complaint
- Protective Order
- Depositions of:
 - Director Gainer
 - Assistant Director Kettelkamp
 - Captain Kresl
 - Captain Struble
 - M/Sgt. Snyders (2)
 - Sgt. Zywiec
 - Trooper Etter
 - Trooper Tone
- Valkyrie Updates during 1994-1995
- Memos from Sgt. Snyders to Valkyrie
- Sections of the ISP Directives Manual
- Tone personnel file

- Complaint and personnel files of selected troopers and incidents
- Four (4) videotapes of training programs
- Training lesson plans and orientations for Operation Valkyrie
- Monthly activities reports June, 1990, in two formats for field stops
- Various internal documents referencing the formats for the activity reports and issues of race designations
- Valkyrie Team Monthly Activity Forms by districts
- Instructions for completion of Activity Reports
- Statewide summaries from activity reports for 1990 and 1992
- Statewide summaries of racial composition of arrested motorists on interdiction stops 1990 and 1991
- Information reports generated by Martin Shapiro
- Materials pertaining to Jim Fyfe

6. It is my understanding that the Plaintiffs have continued to pursue some additional discovery. I would request that this report be considered a preliminary report. I will supplement this report as new information becomes available and materially affects these opinions.

7. This report and my investigation concerns the agency issues involved in this litigation. Those areas include training, supervision, reporting provisions and management control.

8. In my opinion, the Illinois State Police has failed to exercise reasonable supervisory monitoring/control of Valkyrie officers' field performance specifically in relation to enforcement efforts against minorities. The State Police has made conscious choices to avoid collection of reasonable information to ensure that field enforcement does not discriminate against minority motorists. There is no reason for the agency not to document, collect and analyze this critical racial information.

9. Police officers are allowed to use varying degrees of discretion in their dealings with the public, enforcement of laws and decisions on priorities for police services. Yet, this use of police discretion is not an unbridled performance attribute. Abuse of police discretion has occurred and will continue to occur. Supervising, monitoring and controlling individual officer use of discretion has always been a concern to police supervisors and managers. An example is found in a widely held authoritative text on policing:

"Many police chiefs are reluctant to acknowledge that the members of their departments exercise substantial discretion in enforcing the laws and providing various other public services... Yet it is obvious that police officers do and must exercise discretion. In most communities, far more rule violations occur each day and far more noncriminal problems compete for police attention than the police can attend to. This means that officers must routinely choose whom to arrest, warn, counsel, let go, or assist in myriad ways. Often, officers must make these choices without the benefit of rules or other guidelines. And if formal rules exist at all, they may be vague, wrong, or obsolete... When discretion is unguided by articulated departmental values or policy, street officers are not only hindered in performing their duties but are also unnecessarily exposed to temptation." p 252. Local Government Police Management, Third Edition, International City Management Association, 1991

10. This supervisory monitoring and control over individual officer use of discretion is grounded in sound and commonly found supervisory practices. These generally accepted supervisory and managerial practices entail detailed written policies and procedures, in-depth training, definitive reporting requirements, audits and inspections and supervisory oversight. These qualities were fully delineated in the 1973 Police Task Report of the National Advisory Commission on Criminal Justice Standards and Goals as well as in a newer and widely accepted text on police discretion:

"The fear of discretion in government in general is strongest in regard to

police discretion. According to Professor Herman Goldstein, of the University of Wisconsin-Madison Law School, this fear arises from concern over "the awesome power of the police," their reputation "for exceeding their legal authority," and their abuse of "existing discretion." Many high-ranking police in America say in private that police themselves have brought on such criticisms. The history of policing in America does include disregard for the limits of discretion, violation of civil rights, brutality, and arrogance...p 46

"Crises in judgment and discretion can be avoided by anticipating situations in which questions of duty and rightful conduct arise. Facing them when there is time to think can result in better reactions when there is no time and can forestall dilemmas about what to do, not only in uses of force but also in other police work...

"Some people are simply prejudiced against police and any other form of authority. Others are prejudiced in favor of them. When authority, power, and discretion are granted to public officials, however, rational people presume that they will not use more than they need for their legitimate purposes, because rational people would never grant more authority or discretion to abridge liberty or use force than they believed necessary. The presumption is not of guilt but of official respect for restraint. Citizens expect public officials to justify their uses of authority or power when questions arise...

"Since prejudice is always unfair and presumption of guilt is prejudicial, it is therefore unfair. But there is nothing unfair in a presumption of respect for limits and an expectation that the burden of proof will be met by officials who have authority and use it. This presumption amounts to insistence that might does not make right, that officials will bear the public trust faithfully, and that they will accept the onus of showing they are doing so..."p 62-64

Character and Cops, Ethics in Policing, Edwin J. Delattre, 1994

11. When the Valkyrie program was instituted by the Illinois State Police in 1990, the potential for police abuse of discretion, specifically discriminatory enforcement against minorities, was well known in law enforcement. This knowledge stemmed from lawsuits involving other law enforcement jurisdictions, court decisions on pretextual stops, and national media coverage. During the late 1980's and early 1990's there was also pressure for specific law enforcement training in "Cultural Diversity."

This training was endorsed by law enforcement, elected officials and community elements to offset actual, perceived or expected allegations of discriminatory enforcement and policing service practices by local police agencies. Particular notice was given to enforcement efforts by police agencies in highway interdiction programs. A very authoritative text used by police agencies throughout the nation is an assemblage of the leading training, tactics and policies on highway drug interdiction enforcement and it reflects this specific notice:

"Today, officers rarely utter the "P word" except among themselves. For good reason, profiling has sparked controversy, lawsuits, and condemnation and is now officially prohibited by most agencies. Yet in practice the old "traditional profile pattern" continues frequently to be used." p. 45

"Never use red-flag buzzwords like "profile" and "profiling" to explain in your report or testimony why you became suspicious or stopped a given driver...Likewise, don't cite race or ethnicity as a major factor in your decision to make a stop...If you persist in stopping vehicles on the basis only of broad, ambiguous, noncriminal characteristics, like race or type of car, you could find your career as well as your cases profoundly damaged." p. 66-67

"How can I protect myself against accusations of profiling or pretextual stops? By following the normal Criminal Patrol work pattern. Remember, you need a lot of contacts to find the relatively few felony offenders you're most interested in. To get the volume you want, you're going to have to intensively enforce the traffic laws.

"Sure you'll catch some contraband haulers on relatively major common violations. Tired from long miles of nonstop driving, under pressure to deliver fast, a lot more confident of not getting caught after they've been on other successful runs, they frequently do speed or drive erratically. But there'll be times you'll want to stop people who scrupulously avoid these ordinary blunders. You may then need to call upon more *trivial* violations or *public safety* considerations, like having a taillight out or a cracked windshield, changing lanes without signaling, impeding traffic, following too closely, failing to dim lights, speeding 3 to 5 mph over the limit, wearing no seatbelt, allowing air hoses on trucks to rub against metal or liquid to drip onto the roadway from under the back doors of semi-trailers, and so on. This level of enforcement requires an intimate

and resourceful working knowledge of the motor vehicle codes, as well as knowing the outer limits of what prosecutors and courts in your jurisdiction will stand for. But you don't want to wait until you're following someone you think might be a contraband transporter before enforcing these laws.

"You should maintain a "rolling resume," an anecdotal and statistical written log, not only of your training in Criminal Patrol but also of your enforcement activities and any contraband busts that result. Jot down a brief description of each vehicle and occupant you stop on each shift, including the race, sex, age; why you made the stop (the specific violation); the location and the outcome, even if it is just a verbal or written warning.

"This should show fair and consistent enforcement of a wide variety of minor (as well as major) infractions on a regular basis, even if you just write warnings for them. These violations are your bread and butter on Criminal Patrol. They allow you to contact a wide range of motorists, which is what you need, not only for your record but because you understand that the least likely parties often turn out to be the very ones you're looking for.

"If you're accused of profiling or pretextual stops, you can bring your daily logbook to court and document that pulling over motorists for "stickler" reasons is part of your customary pattern - not a glaring exception conveniently dusted off in the defendant's case. This makes it difficult if not impossible for the defendant to claim that the stop would not have occurred without your ulterior motive, which is a necessary component of proving that a pullover was pretextual. (Moreover, include in your log all the times you make contact with the motoring public to assist them for their convenience and safety, such as changing tires, giving directions, et cetera. This will help build your credibility in court as a "good guy" who makes frequent contacts as a normal part of your daily activities.)" p 69-70

Tactics for Criminal Patrol, Vehicle Stops, Drug Discovery and Officer Survival, Charles Remsburg, Calibre Press, 1996

12. In March, 1990, command personnel of the Illinois State Police acknowledged these specific potential challenges. Captain Kenneth Phillips, Area III Commander, in his memo to District Commanders of Districts 6,9, and 10 noted:

"Please use the attached form for reporting your district's Valkyrie Team activity. Feedback from members of your Drug Interdiction Team is important, especially for officer safety. This feedback also plays a vital role in maintaining the integrity of the program. Please note the categories listed: "Nationality of Drivers

Searched" and "State of Vehicles Searched." These items have aided the Drug Interdiction Team in District Six in past court proceedings when the court became concerned about biased interdiction practices. These two statistics could help prove impartiality on our part."

This memo was also sent to Assistant Deputy Director Larry Drager.

Sgt. Snyders, the coordinator of the program for the Illinois State Police, in his deposition on July 17, 1996, acknowledged this similar concern when the program first began:

"I knew going into this program that there was potential for people to question what we're doing, and I think I was asking for race just as a curiosity thing, knowing - working with these officers every single day, being out there on the road myself with the officers every single day, knowing what we were doing was not targeting race - the drivers based on race. I knew that that's what we were doing, and I also knew there was potential for someone to come along later saying that that's what we were doing. So I am sure that's one of the reasons that I asked for that, so that I could show people later what we truly are trying to do out there or what we are doing out there. Uhm, and at the same time, again, I am trying to learn. So I would have used that information to learn from." p 49-50

13. Law enforcement agencies historically have documented race in its reports. Most states required race to be noted in traffic citations to ensure proper and responsible warrant enforcement for failure to appear cases. I am aware that the Illinois State Police do not record race in its traffic citations or warnings. Race becomes a significant element in issues critical to officer safety in such police contact incidents as assaults on law enforcement officers, gang peculiarities and wanted persons notices.

14. Some reasons police officers may abuse discretion in their enforcement efforts are recognition and job security. Recognition and rewards are given to officers by supervisors and agencies in the form of commendations and evaluations. If these

encourage greater production of citations, warnings, searches and seizures, they can result in increased desire by officers to stop persons in indiscriminate manners. If the officer's outcome performance and production numbers is necessary to retain select assignments, such as a Valkyrie Team slot, some officers may abuse discretion in their field performance. There are numerous and continuing examples of this in the street drug enforcement efforts resulting in corruption scandals in cities such as Atlanta, Jacksonville, FL., Boston, and Philadelphia.

15. Reasonable supervisory monitoring/control systems and techniques in law enforcement include:

- Quality reporting requirements and data collection
- Report review and critique by supervisors
- Supervisory field observation
- Call-backs to citizens contacted by police officers
- Audits and inspections
- Analysis of specific field performance by individual officers
- Complaint investigations and complaint analysis

16. The "factors" advocated by the ISP and other law enforcement programs for drug interdiction efforts are indicators subject to discretion abuse by enforcement officers. Many of these are overly broad, general and can be made to fit any person on the highway at any hour of the day, in my opinion. These are the types of training and supervision which can give officers "institutionalized" foundation for an abuse of discretion in these types of sensitive and invasive highway motorist stops. These can allow and encourage officers to engage in creative report writing or "testilying" as coined by former New York City Police Commissioner William Bratton. Examples of these from the ISP Operation Valkyrie Central Command Training (September 1994) are:

"Signs of stress and/or deception...

"Frowning..."

Rubs or Touches nose...

Patting of the cheek...

Licking the Lips...

Playing with Fingernails...

Rubbing Hands or Fingers Together...

Folds Arms Across Chest...

Exaggerated Movement..."

17. The Illinois State Police, in my opinion, has the ability to properly use the supervisory monitoring/control techniques outlined in paragraph 15. This is an opinion based on the volume of data collected for the various Valkyrie reports, capabilities of the Field Report form, statistics accumulated for training, and the depositions in this case. It is apparent that the State Police has elected to simply not collect data relating to race when evaluating the performance of its field officers. The failure of the Illinois State Police to identify race on its traffic citations and warnings also has limited the Department's ability to determine whether its officers are or are not engaged in discriminatory drug interdiction enforcement practices, in my opinion.

During his July 17, 1996, deposition, Sgt. Snyders was asked whether he continued the collection of data relative to race when he assumed the statewide coordinator position for the Valkyrie Program:

"No, uhm, primarily because I didn't believe it was a problem at the statewide level or in District 6 and I constantly heard gripes about paperwork, and I thought that I would try to do things that would reduce paperwork as opposed to increase it. Especially, in areas that I didn't think there was a problem. So I don't think I considered it...It could have been useful, but I don't think it would have been worth the agony of trying to convince all these other officers to be doing extra paperwork for the value that we're getting out of this. I mean, to me a curiosity of value. There's some usefulness at a curiosity level. But whether it is - it is useful as far as requiring people to do extra paperwork, it is not worth it, I don't think." p

101-102

18. During 1990 or 1991, the Illinois State Police conducted a special information run to determine the "sex/race/arrest makeup" of Valkyrie Team enforcement efforts. This memo dated June 20, 1991, indicated:

"Subject: Challenges to State Police Highway Drug Interdiction Programs

"After reviewing the article "Survey on Traffic Stops Raises Colorable Selective Enforcement Claim", in the May issue of the Criminal Law Reporter, supplied in Deputy Director Brandt's June 10, 1991 memo. I analyzed calendar year 1990 Automated Valkyrie File records to determine the sex/race/arrest makeup..."

This, amongst other documents, belies the State Police's contention that the issue of race was never a topic of discussion in regards to the Valkyrie Team Program. This report further is indicative that the data available was deficient for any reasonable supervisory evaluation in that it did not separate Hispanics. The classification of White represented 70 percent in this specific run.

19. A series of internal memos of the State Police, in my opinion, are indicative of this agency policy to make this conscious choice to avoid keeping data reflecting the race of persons involved in these interdiction stops and searches. The June, 1990, Valkyrie Activity reports of Sgts. Osborn and Snyders and Captain Kemner reflect race breakouts of White, Black, American Indian/Alaskan, Mexican, Puerto Rican, other Hispanic, and Asian Pacific. The May 21, 1990, memo of Captain Kenneth Phillips indicated:

"Please note the categories listed: "Nationality of Drivers Searched" and "State of Vehicle Searched." These items have aided the Drug Interdiction Team in District Six in past court proceedings when the court

became concerned about biased interdiction practices. These two statistics could help prove impartiality on our part."

In his memo of May 17, 1990, Deputy Director O'Sullivan to Area and District Commanders regarding Valkyrie Teams' Monthly Activity Form and Data Elements Listing indicated that these forms would be used to compile "information relative only to the Valkyrie Team operations and include only information which is not currently available from another reporting process." Race was not one of those listings on the attached forms.

In his memo of June 14, 1991, Major Drager, Area III Commander, to Assistant Deputy Director Keil, recounted that his District Six team had been continuing to keep race data on its enforcement reports. It further reflected:

"In your opinion, should we continue to record this information and, if so, should it be collected on a statewide basis? The District Six Drug Interdiction Team has found statistics on "nationality of drivers searched" and "state [of registration] of vehicle searched" useful in court proceedings when the court became concerned about biased interdiction practices. These two statistics have helped us prove our impartiality."

In M/Sgts. Scaggs' memo of June 27, 1991, to Staff Services Command, Field Support Bureau, he wrote:

"I spoke with Sgt. Snyders about the activity report. He advised me that it is used as a supervisory tool to ensure that team members do not concentrate on certain ethnic groups, nor on states that a vehicle is registered in. He stated that to date it has not been used in any legal proceedings. I feel that the report should not be used throughout the state. Since all the information contained in the report is available from MIB, the report is redundant."

The use of race based data was not used statewide and was subsequently eliminated even in District Six. The State Police has indicated that this same data is

apparently not available from its information collection sources at MIB.

20. The reason for specific and detailed data on searches such as those conducted during highway drug interdiction programs can be seen from information in this case. In a report of "Dedicated Valkyrie Team Activity" for the calendar year 1992 the data reflects a definite supervisory tool for evaluation of field officer performance and officer use of discretion. In this report District 4 and 11 searched half of the vehicles stopped and one in three respectively. Both Districts had a search to seizure ratio of 1:21. This is diametrically opposite the bulk of the other districts. Any reasonable supervisor should have noted that these teams were not using reasonable discretion in their decisions to search vehicles stopped. This document also belies Sgt. Snyders' assertion that 95-98 percent of the stops won't result in a request to search.

21. The depositions of command officers of the Illinois State Police indicate that the policy of the State Police was to avoid documenting racial information and analysis of racial stops in its drug interdiction program. Commander Kresl, District 17, testified that there was no documentation of race other than on the Field Reports and there has never been any analysis of race based enforcement to his knowledge. When asked how he would learn of such discriminatory practices by a trooper he stated on page 99, "Probably from information brought to him by his fellow officers, you know, that there's something that's not correct here, by seeing, you know, field reports of a certain race." Commander Struble, District 7, also has never seen statistics on race in relation to interdiction stops and he believed that it was not important to compile race based data on stops, detention or searches (p. 31). Even Director Gainer testified that

his audit and inspection unit, which is directly under him, had the ability to do such an analysis, but hadn't nor had he requested it. He indicated that there was no discussion of race based allegations when the Valkyrie program was started.

22. The testimony of command persons in the Illinois State Police also indicated that citizen complaints would be one of the important tools to determine whether officers were discriminating in their enforcement efforts. But all commanders deposed including Director Kettelkamp, head of Division of Internal Investigations, indicated that the agency has no system to identify officers with frequent complaints, commonly referred to as an Early Warning/Identification System. Even after this litigation was filed, Director Gainer ordered no inquiry into the potential discriminatory enforcement by his field officers as he "...doesn't believe (it was) occurring." Gainer said such conduct would be identified by DII's analysis and surveys of complaints. But, Director Kettelkamp, in her deposition, acknowledged that DII does not conduct such audits. Even her account of the process of investigating these citizen complaints indicates that the State Police conduct deficient and perfunctory investigations contrary to generally accepted practices for such critical allegations. Some of those issues she testified to were that they don't always follow-up on witnesses provided by the complainants, sometimes don't even interview the accused officer and simply rely on his/her report, never analyze complaints based on race, wouldn't investigate an allegation if it accused the officer of enforcement based on race and would relate that that was something for the trial court to consider, and never did quality control checks on these internal investigations.

23. This report has addressed many specific issues of deficiencies in supervisory practices of the State Police in prior paragraphs. One specific example related to Trooper Tone's encounters with Plaintiff Gomez. Tone's commanding officer, Commander Kresl, acknowledged that Tone's Field Report was false or "inaccurate" as he described it. On page 82 of this deposition he stated, "It probably should be something would take, you know, a corrective report for or something along that line, yes." But he acknowledged that he hadn't taken any supervisory action in regards to this allegation.

24. The State Police also has a Consent to Search form which it mentions in training, as well. Director Gainer was aware of its existence. It is apparently not used in drug interdiction enforcement efforts. MSgt. Snyders in his training acknowledges that he does discuss the use of the consent to search form, but he also indicates that it is seldom used by Valkyrie enforcement units and he feels it would inhibit the ability to get consent from motorists. His supervisory and training position, in my opinion, would discourage use of such a form by his subordinates and persons he trains as statewide coordinator for the Valkyrie Program. This consent to search form was developed by the State Police, similar to other police jurisdictions, and the agency has elected not to require its use it.

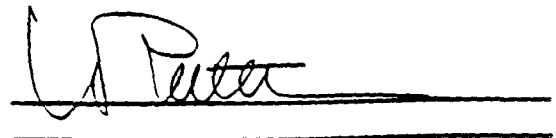
25. It is my understanding that additional materials may be in process of being produced or may be requested later. I would request that this report be considered a preliminary report. Should any subsequent information be produced and materially affect or alter any of these opinions, I will either submit a supplemental

response or be prepared to discuss them during any scheduled deposition.

26. At this point in the development of this case I do not know whether I will be using any demonstrative aids during my testimony. Should I decide to use any such tool, I will assure that they are made available for review, if requested, prior to their use.

27. My professional charges for this litigation work is an Expanded Case Development Fee of \$5000, deposition fee of \$1500 if conducted in Tallahassee, and a daily fee of \$2000 plus expenses for work away from Tallahassee including both deposition and trial testimony.

This report is signed under penalty of perjury on this 6th day of February, 1999, in Tallahassee, FL.



Lou Reiter

LOU REITER...RESUME

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POLICE CONSULTING EXPERIENCE

Lou Reiter has been the principal consultant with Lou Reiter & Associates since its inception in 1983. In that capacity he has been providing professional consulting to law enforcement agencies in three primary areas: (1) training, (2) agency audits and (3) litigation services.

TRAINING

Lou Reiter typically conducts 15-20 training seminars and programs each year involving approximately 1000 persons. These presentations range in time from 3 hours to five (5) days with the majority being a two (2) day seminar. Normally attended by police supervisors, managers, command personnel and litigation/nsk management elements, these seminars involve police practitioners from federal, state, county and municipal law enforcement agencies.

The most common areas of presentation and instruction are:

- Managing the Internal Affairs function, police discipline and the citizen complaint process.
- Investigation of critical incidents - officer involved shootings, use of force, and pursuits/emergency responses.
- Police discipline.
- Use of force and deadly force issues.
- Police pursuit/emergency response issues.
- Investigative procedures and supervision.
- Personnel practices.
- Supervisory techniques.
- Liability management.
- Policy and procedure development.
- Jail intake procedures.
- Management effectiveness.

These training programs have been presented in the following states for police training academies, private training groups, public agencies, governmental entities and academic facilities:

California	Pennsylvania	Minnesota	Washington
Florida	Virginia	Missouri	Hawaii
Georgia	Maryland	Arizona	Vermont
New York	Ohio	Nevada	North Carolina
Texas	Indiana	Utah	Illinois
South Carolina	Wisconsin	Colorado	Oklahoma
Massachusetts	United Kingdom	Oregon	

LAW ENFORCEMENT AGENCY AUDITS

These types of agency audits take on many different forms. Some are designed to identify the strengths and weaknesses of the agency, make recommendations and present specific timetables for implementation. Others are specifically designed to evaluate the agency's liability potential, make recommendations and suggest implementation strategies. Some involve budgetary concerns and consideration of consolidation of police jurisdictions. Occasionally the purpose is to conduct an administrative investigation using external investigators due to sensitive or political potential conflicts of interest. Some are accreditation and re-accreditation on-site assessments for the Commission on Accreditation for Law Enforcement Agencies, Inc.

These audits are conducted either as a one-person unit or as a member of a larger team of police professionals, although not more than six (6) total. Most of these are through contracts with the affected governmental body. Some are through a litigation or risk management unit.

Lou Reiter since 1983 has audited law enforcement agencies as small as three (3) persons to as large as 12,000 personnel. They have represented municipal, county and state entities. Normally, he conducts 3-5 of these audits each year. During these forms of audits, he rides with line officers and first level supervisors for nearly 100 or more hours for interviews and direct observation of field implementation.

The primary areas of focus during these audits are:

- Citizen complaint procedures.
- Discipline, internal affairs and early warning systems.
- Personnel practices including selection, hiring, EEOC/AA, promotion, assignment and retention.
- Specialized operations including traffic, investigations, narcotics, vice, intelligence, emergency response teams and unusual occurrence units.
- Organizational structure and command responsibilities.
- Police department governance.
- Policy and procedures development.
- Use of force policy and procedures.
- Investigation of critical incidents.
- Training and training documentation
- Use of police resources
- Support functions including communications, records and detention and holding facilities.

These types of agency audits have been conducted in the following states:

Florida
Georgia
Arizona
Colorado

Delaware
Pennsylvania
North Carolina
South Carolina

Virginia
New Mexico
California
Illinois

Wisconsin
Tennessee

LITIGATION SERVICES

Lou Reiter, since 1983, has been involved in over 600 law enforcement civil litigation cases and a few criminal matters. He has acted both as a consultant and testimonial expert witness. These have been in Federal and local courts. He has worked with plaintiff attorneys approximately 60 percent of the time and the remainder with defense units. He has also been employed in this area by insurance entities, risk management pools, local prosecutorial offices and the United States Department of Justice.

While there has been a wide range of specific law enforcement practices and procedures which have been involved in these cases, some of the more common issues addressed in case development and subsequent testimony have been:

- Field procedures including tactics, arrest techniques and pursuits/emergency response driving.
- Standards of police misconduct investigations.
- Use of force and deadly force.
- Supervision.
- Investigative procedures, including warrant applications, informant control and use, and search warrant processes.
- Jail intake procedures.
- Police management.
- Personnel practices, including hiring, retention, remediation, background investigations, use of professional counseling services and promotion/assignment.
- Investigation of citizen complaints.
- Employee discipline.
- Police policy and procedures development.
- Police training.

These litigation services have been in the following states and jurisdictions:

Florida
Georgia
Alabama
Mississippi
Louisiana
California
Texas
Missouri
Illinois
Indiana
Michigan

Oregon
New Mexico
Arizona
Alaska
Hawaii
Montana
Wyoming
Colorado
Kansas
Oklahoma
Texas

Kentucky
Tennessee
Minnesota
Ohio
South Carolina
North Carolina
Virginia
District of Columbia
Maryland
Pennsylvania
New York

New Jersey
Delaware
Connecticut
Maine
New Hampshire
Puerto Rico
Rhode Island
Washington
Wisconsin
Massachusetts

PRIOR ACTIVE POLICE EXPERIENCE

Lou Reiter was a sworn member of the Los Angeles Police Department for 20 years between 1961-1981. He began as a police officer and retired as a Deputy Chief of Police. During that tenure he served in over 20 assignments. Some of those assignments included:

Promotion schedule.

- 1980 Deputy Chief of Police
- 1976 Commander
- 1974 Captain
- 1970 Lieutenant
- 1966 Sergeant
- 1961 Police Officer

Personnel and Training Bureau, Commanding Officer. As a Deputy Chief directed the operations of three (3) divisions and two (2) major sections, involving over 300 employees.

- Responsible for all training, personnel management, recruitment and selection, employee-management relations and behavioral science services
- Responsible for the successful implementation of the 1980 Consent Decree requiring increased hiring of females and minorities
- Chairman of the Use of Force Review Board which adjudicated all officer-involved firearm discharges, serious injuries resulting from police action and in-custody deaths
- Caused the initiation of a unique peer counseling program for employees and a transfer system for "burned out" employees from high activity areas and assignments.

Operations West Bureau Commanding Officer. Directed all police operations (patrol, traffic, investigations and vice/street narcotics) in the Western quadrant of the City with four (4) geographic stations and one (1) traffic division involving over 1400 employees.

Planning and Fiscal Bureau Commanding Officer. Directed the operations of five (5) divisions, involving over 400 employees.

- Responsible for the \$310 million Police budget preparation and management
- Automated systems
- Planning and research
- Communications
- Guided the development of the Emergency Command Control Communications System, a multi-faceted computer based system financed by a \$40 million tax override
- Provided on-going liaison with the City Council and directed efforts to develop local and state legislation

Uniformed Coordinator for Operations Central and Valley Bureaus. Each Bureau consisted of five (5) geographic stations, a traffic division, gang enforcement unit, and over 1600 employees. In addition to the overall coordination of patrol and uniformed operations, monitored and approved personnel complaint investigations, adjudications and discipline during this four (4) year assignment.

- Coordinated the successful police efforts in the San Fernando Valley during the 1978 school

- desegregation
- Directed the City-wide 500 person police reserve officer program
- Department liaison to community alcoholism programs
- Participant in the Physical Altercation and Tactics Committee
- Regular member of the Fleet Safety Review Board and Shooting Review Panel.

Central Area Commanding Officer. For two (2) years commanded over 250 uniformed officers and detectives in the Los Angeles Central City (downtown) area.

Team policing. Selected to make preliminary preparations and then command a unique team policing experiment in Foothill Division in July, 1973 (this was similar to the current Community Oriented Policing concept). This consisted of a command of 57 employees including detectives and traffic officers to maintain 24-hour police service for this area. Crime went down in this area while it rose in adjacent areas.

Traffic assignments. Served as a uniformed traffic accident investigator throughout the City. Investigated 1200-1500 traffic accidents and arrested nearly 400 drunk drivers. Provided specialized enforcement and accident investigation on the City's freeway systems in specially equipped pursuit vehicles.

Patrol assignments. Was a uniformed patrol officer in three (3) geographic stations. Functioned as a plainclothes member of an anti-crime unit. As a sergeant was a field supervisor and later, as a lieutenant, was a uniformed watch commander.

Employee misconduct administration. Investigated cases alleging employee misconduct both as a field supervisor and member of Internal Affairs Division. As the Department Advocate, presented the agency case against employees during internal administrative hearings (Boards of Rights). Later, as a Lieutenant, acted as a defense representative for accused employees during these same hearings. Adjudicated investigations of police misconduct and served as a member of Boards of Rights on many occasions.

Other personnel related activities. Participant in the Physical Altercation and Tactics Committee, Fleet Safety Review Board and Shooting Review Board. In 1981, chaired the Police Productivity Workshop which presented recommendations for massive changes in operations to respond to budgetary restrictions imposed by the passage of Proposition 13.

Training commands and assignments. Commanded (1980-1981) the Personnel and Training Bureau which included the Police Academy and video training production unit. Implemented programs (1980-81) to assist in the achievement of court consent decree hiring of females/minorities and their successful performance during the training aspect of their employment. Was the Assistant Commanding Officer of the Police Academy. Was the Officer-in-charge of the Human Relations Training Unit which covered such topics as community and cultural diversity, officer-partner relations, inter-personal communications, and handling the emotionally disturbed and mentally ill.

Staff researcher and author for the 1973 Police Task Force Report of the National Advisory Commission on Criminal Justice Standards and Goals. The report assisted agencies nationwide to update their operations and develop plans for future growth and strategies. The three (3) specific chapters researched authored by Lou Reiter were "Internal Discipline, Training and Management-Employee Relations."

Managing Unusual Occurrences. Member of the Department Field Command Post Cadre since its inception following the 1965 Watts Riots. Developed procedures for police operations during such incidents principally as a member of the Operations Section and later incident command functions. Participated in numerous actual unusual occurrence control operations as well as training exercises responding to natural

and man-made incidents.

Volunteer police. Managed the LAPD 500 person Reserve Officer Corps. Developed revised training programs and an in-service training element. Created a unique expert advisory group within this volunteer corps specializing on the expertise of lawyers, doctors, statisticians, educators and other specialists. Implemented a 54 person Reserve Chaplain program. Lobbied for and supported State laws mandating strengthened training and selection requirements for volunteer elements of police agencies.

Community Relations and Crime Prevention. Community Relations' lieutenant and Assistant Commanding Officer of Hollywood Division, directing the community mobilization and crime prevention efforts. Was the Officer in Charge of the Public Service and Crime Prevention Section, Public Affairs Division.

New Careers and Concentrated Employment Program. In 1967, initiated, implemented and administered this U.S. Department of Labor funded program which employed, trained and assigned disadvantaged, underemployed persons to police community relations and crime prevention programs. Ninety (90) percent were ex-convicts or former narcotics users.

Planning and Research. Researched and authored policy and procedure changes for the Department and incorporated them into the Department Manual.

ADDITIONAL INSTRUCTIONAL EXPERIENCE

During the years since 1971, Lou Reiter has been involved in continuous and varied aspects of training both within and outside the law enforcement field. Some of those not covered in the preceding sections are:

- Faculty member for national level police management and specialized programs for organizations such as the Public Agency Training Council (Indianapolis), Americans for Effective Law Enforcement (Chicago), Institute for Police Technology and Management (Jacksonville, FL), Police Foundation Executive Institute, Commission on Accreditation for Law Enforcement Agencies, National League of Cities, Law Enforcement Assistance Administration, academic institutions, local police academies, state police organizations and risk management/insurance pool groups.
- Senior Consultant, Institute for Liability Management.
- Faculty member, Criminal Justice Management Program, Florida Center for Public Management, Florida State University.
- Certified Instructor, Law Enforcement Supervision/Management, Florida Department of Law Enforcement.
- Lifetime Vocational Training Certificate, Law Enforcement, California.
- Developed and presented "Frontline Supervision," a police supervision program.

Elected to the Santa Clara Community College Board of Trustees in 1975 and reelected in 1979. Served as Board President and acted on many local and State committees on education.

Past member:

- Police Science Advisory Boards for Junior Colleges of Rio Hondo, El Segundo and Harbor City in the Los Angeles area.

- Faculty member for graduate and undergraduate level courses at various universities and colleges.
- Principal faculty member for the Management Development Program for the City of Los Angeles.
- Trainer for Florida American Cancer Society's Volunteer Leadership Development Program.
- California State University, Northridge, Advisory Committee on Teacher Education.
- Advisory Committee on Clinical Rehabilitative Services Credential, Department of Communicative Disorders.

LAW ENFORCEMENT PROFESSIONAL ACTIVITIES

Since 1973, Lou Reiter has been involved in law enforcement professional activities and programs. Many of these were during his tenure with the LAPD. Other have been as a concerned public member and police consultant. Some of those include:

- Assessor, Commission on Accreditation for Law Enforcement Agencies, Inc., (1985-), and has been assigned to both on-site audits for accreditation and re-accreditation.
- American Society for Law Enforcement Trainers, member.
- National Center for Women and Policing, member.
- Founding Member, Tallahassee Committee of Ninety-Nine and former member of Board of Directors (1982-1988) and Secretary (1984-1987). This organization was formed in 1981 and provided support to local law enforcement agencies for greater professionalization, underwriting local police training programs, purchasing police equipment and ensuring benefits to families of police officers.
- Presenter and participant, 1982 and 1983 Florida Governor's Challenge Conference on Crime.
- Chair, Public Safety Committee, 21st Century Council, City of Tallahassee (1990-1993). This citizen group was organized to create an annual assessment guide to evaluate the effectiveness of our community's public safety performance.
- Past member, California Peace Officers Association
 - Chairman (1979-81) Standards and Ethics Committee.
 - Initiated and moderated the First Joint Symposium on Professional Issues.
 - Developed and received State approval and distribution of the *Code of Professional Conduct and Responsibilities for Peace Officers*.
 - Member, Law and Legislation Committee.
 - Member, Small Agency Committee.
 - Member, Reserve Officers Committee.
 - Recipient of the 1981 'Professionalism Award' from the California Peace Officers Association.
- Member or past member:
 - Florida Sheriffs' Association, Lifetime Member.
 - Florida Council on Crime and Delinquency.
 - American Society for Training and Development, local and National.
 - Public Safety Committee, League of California Cities.
 - Los Angeles County Peace Officers Association.
 - Southern California Police Community Relations Officers Association.

PUBLICATIONS

Lou Reiter has published many law enforcement articles. With the exception of his Internal Affairs manual mentioned below, most of his current publications are integral parts of training he provides and are tailored to the specific subject matter and audience of the presentation. The below represent many of his published works:

- *Law Enforcement Administrative Investigations, a manual/guide.* This comprehensive 120 page manual was first published by Lou Reiter & Associates in 1993. The 2nd edition is being published in 1998 and is an expanded version with several guest author chapters and will be over 250 pages in a 'nuts and bolts' method of presentation for practitioners.
- "Creating Reasonable and Defensible Discipline," Commission on Accreditation for Law Enforcement Agencies, Inc., Newsletter, November, 1996.
- "Timesharing With Your Subordinates," Florida Police Chief, April, 1984.
- "Police Agencies Need Shooting Policy," Tallahassee Democrat, September 27, 1982.
- "Truth About Miami Is Down in the Streets," Tallahassee Democrat, December 27, 1982.
- "Police Recruitment in the 80's - Crisis or Opportunity?" Western City, May, 1981.
- "Civil Detoxification in Los Angeles," Police Chief, August, 1981.
- "Professional Police," California Peace Officer, 1980.
- "The Elected Public Official Views Police Professionalism," California Peace Officer, 1980.
- "A Footbeat Officer's View of Police Work," Journal of California Law Enforcement, October, 1979.
- "A Day With Sergeant Maynard Jones," Police Chief, April, 1979.
- "Field Sergeants' Administrative Time Utilization," Journal of California Law Enforcement, unknown date.
- "Make Your Meetings Successful," Journal of California Law Enforcement, April, 1979.
- "Ways To Get That Paper Out Now, Faster and Better," Journal of California Law Enforcement, October, 1978.
- "Internal Discipline," "Training," and "Management-Employee Relations," Police Task Force Report, National Advisory Commission on Criminal Justice Standards and Goals, United States Department of Justice, U.S. Printing Office, 1973.

URBAN ECONOMIC DEVELOPMENT AND COMMUNITY ACTION GROUPS

During his residence in both Southern California and Florida, Lou Reiter has been active in various programs designed to improve and enhance community and economic development. Some of those activities have included:

- Tallahassee Area Chamber of Commerce and committees on County and City Governments.
- Local committee for district member voting in Leon County.
- Forward Tallahassee.
- Board of Directors, Skid Row Development Corporation. A non-profit organization formed to stimulate redevelopment of the skid row area in Los Angeles, attract funding sources, funnel monies to redevelopment projects and oversee the general plan for this designated area. During the first year originated over \$6 million of projects impacting business.

- stimulation and residential housing.
- Board of Governors, Alcohol Detoxification and Rehabilitation Center. In 1976 conducted an extensive management study of this program. The results were implemented and produced an increased intake of public inebriates and reduction in walkout rates.
- Central Business District Redevelopment Project, Skid Row Task Force.
- Greater Van Nuys Chamber of Commerce and member of the Business Improvement Committee and Vitalize Van Nuys, Inc. (a specific economic action project).

COMMUNITY ACTIVITIES

Community activities have been a personal commitment for Lou Reiter. Many of these were in connection with his duties as a police practitioner. Others were from his personal orientation to the communities in which he has lived. Some of those not previously mentioned have included:

- American Cancer Society
 - Board of Directors and Executive Board, Florida Division.
 - State Crusade Committee, Vice Chair.
 - Chairperson, State Direct Mail and Marketing Subcommittee.
 - President (1986-87) and Board of Directors, Leon County Unit.
 - Trainer, State Volunteer Leadership Development Program.
 - Crusade Chairperson (1982-84) Leon County Unit which increased donations 60% to a record high of \$111,000 annually.
- President, Consolidation NOW, a citizens' group advocating the consolidation of governments of Leon County and the City of Tallahassee.
- President (1985) and member Board of Directors (1983-88), Tallahassee Junior Museum. During the year as President the museum received accreditation from the American Association of Museums.
- Chairperson, Airshow '86, Tallahassee's first major airshow. Co-chair, Airshow '87.
- Rotary International
 - Tallahassee Capital Rotary (1981-)
 - Paul Harris Fellow (1976)
 - Service Above Self/Member of the Year recipient (1986-7)
 - Presenter at district and zone conferences
 - Past member, Newhall, CA., Rotary
 - Creator of the Newhall Rotary Community Service Fund
- Memberships, current and previous:
 - Forward Tallahassee, Public Safety Committee
 - Florida Economics Club
 - Tallahassee Tiger Bay Club
 - WFSU-TV committees
 - Partners in Excellence, a school/business support program
 - 1987 Leon County School District "Citizens For Better Schools" Bond Steering Committee
 - Florida State University Artists Series, benefactor
 - Public Inebriate Task Force, Alcoholism Council of Greater Los Angeles
 - Canyon County, CA., Formation Committee
 - Vice President and Board of Directors, Santa Clara Valley Boys and Girls Club
 - Board of Directors, Tallahassee Informed Parents
 - Boy Scout Troop 23 Committee
 - Swannee Area Scout Council Fund-raising Committee

- Board of Directors, LeMoyne Art Foundation
- Member and Director, United Way of Leon County

FORMAL EDUCATION

University of Southern California - Graduate of the Managerial Policy Institute (1980) and graduate study in the Master of Public Administration program.

Pepperdine University - Bachelor of Science in Public Management/Criminal Justice Program .

University of California at Los Angeles - undergraduate study in Political Science.

PERSONAL

Born March 31, 1939, in Minneapolis, Minnesota.

Resident of Tallahassee, Florida, since 1981. Wife Marilyn is an attorney and certified Florida police officer, currently specializing as a consultant in law enforcement and prosecution issues of Domestic Violence. They have six (6) grown children one of whom is a police officer with the City of Tallahassee.

Lou Reiter lived in the Los Angeles area for nearly 30 years.

LOU REITER TESTIMONY

January, 1995

Michael Avery, Newton Centre, MA., *Evans v. Greene*, 94-10194-WGY, D
Mark Hirsch, Albuquerque, NM, *Ray v. , City of Albuquerque*, CV-93-5711, D
Carol Watson, Los Angeles, *Mittenhuber v. County of Los Angeles*, CV92-5688 CBM(EEEx), D
Leonard Deitzen, Tallahassee, *Pascalli v. County of Pasco*, 93-1129-CIV-T-21C, T
Kathy Cima, Minneapolis, MN, *Ibura v. City of Golden Valley*, PI 92-018920, D
James Barry, West Palm Beach, FL, *Daniels v. Palm Beach County Sheriff*, 91-8172 CIV-ZLOCH, D
Anna Kanwit, Portland, OR., *Erickson v. City of Portland*, Arbitration, T

February, 1995

Mike Marrinan, San Diego, *Lopez v. County of San Diego*, 93-1723-E (BTM), D
Ron Labasky, Tallahassee, FL, *Barbee v. County of Pasco*, D
Martin Bern, San Francisco, *Joyce v. City/County of San Francisco*, D
Doug Levinson, Santa Monica, CA, *Harper v. City of Compton*, 92-2480 WJR (CTX), T
Sophia Ehringer, Orlando, FL, *Sewell v. City of Lake Hamilton, FL.*, 93-2037-Civ-T-15A, D

March, 1995

Anthony Mirande, Boston, *Montilla v. LaFontaine*, 93-11709-RCL, D
Joseph Ripley, Jr., Jacksonville, FL., *Mickler v. City of Jacksonville*, D
James Barry, West Palm Beach, FL, *Bush v. Palm Beach County*, CL 91-11721 AO, D
Loree French, Jacksonville, FL, *City of Atlantic Beach v. City of Jacksonville*, 93-01190-CA, D

April, 1995

James Barry, West Palm Beach, FL, *Dawson v. Palm Beach County Sheriff*, 93-8229-CIV-ROETTGER, D
Michael Puize, Los Angeles, *Colvin v. City of Gardena, CA.*, SWC 102798, D

May, 1995

Sophia Ehringer, Orlando, FL., *Sewell v. Town of Lake Hamilton, FL.*, 93-2037-Civ-T-15A, T
Garo Mardirossian, Los Angeles, *Dole v. County of Los Angeles*, C751398, T
Michael Walsh, West Palm Beach, FL., *Anderson v. Port St. Lucie, FL.*, D
Robert Bennett, Minneapolis, *Sax v. Kroll*, Civil 3-94-394, D
John Zelbst, Lawton, OK., *Delluomo v. City of Lawton*, CIV-93-677A, T
William D. Brett, Norwalk, VA., *Gambelli v. U.S.A.*, 2:94cv686, D

June, 1995

Brad Hall, Albuquerque, NM, *Diaz v. City of Santa Fe*, CIV 94-596 LH/MWD, D
Ray Bodiford, Orlando, FL, *Woolhouse v. City of Orlando*, 94-77-Civ-Ort-22, D

July, 1995

Norma Guess, Bolingbrook, IL, *Gildon v. Will Co. IL*, 94 C 3116, D

August, 1995

Mike Avery, Boston. *Evans v. Avery*, 94-10194-WGY. T
Garo Mardirossian, Los Angeles. *Dole v. County of Los Angeles*. C751398. T

September, 1995

Ray Bodiford, Orlando, FL. *Woolhouse v. City of Orlando*. 94-77-CIV-ORL-22. T
James Seaberry, Chicago. *Sanders v. City of Chicago*, 91 L 7200. D
Ira Sherman, Washington, D.C.. *Finch v. District of Columbia*, 94-00550. D
Robert Mann, Los Angeles. *Alvarez v. City of Westmoreland*, USDC 94-1119 IEG(CM), D

October, 1995

Charles Vaughn, Lafayette, IN.. *Davies v. City of Lafayette*. 79D02-9403-CF-30, D/T
Joe Fine, Albuquerque. *Stewart v. Stover*. CIV95-0290 JPM/WD. D

November, 1995

Howard Freidman, Boston. *Adams v. Town of Wareham*. 94-11446-DPW. D/T
James Seaberry, Chicago. *Sanders v. City of Chicago*, 91 L 7200. T
Bob Bennett, Minneapolis. *Sax v. Kroll*. Civil 3-94-394. T
Steve Brooks, Atlanta. *Hardeman v. City of College Park*. 94V896474-A. D
Jeffrey Norkin, Miami. *Rodriguez v. City of Miami*, 94-2426 UNGARO-BENAGES. D

December, 1995

Eric Ferrer, Los Angeles. *Arvizu v. City of South Gate*, VC 015877. D

January, 1996

Norma Guess, Bolingbrook, IL.. *Gildon v. Piazza*, 94-C-3116, T (US/Hart)
Eric Ferrer, Los Angeles. *Arvizu v. City of South Gate*, VC 015877, T (ST/Sutton)
Larry Pankey, Decatur, GA.. *Randolph v. County of DeKalb*. D

February, 1996

Richard A. Sipos, Oakland, CA.. *Customer Company v. City of Sacramento*. D

March, 1996

John Montag, Los Angeles. *Crudup v. City of Ontario*. SA CV 94-733 AHS (EEx). D
Robert Griffith, Boston. *Gonsalves v. New Bedford*. 91-11993C. T

April, 1996

Alan Denenberg, Philadelphia. *Phillips v. Bridgeton*. NJ.. 94cv1290 (JEI). D
Peter Berkowitz, San Juan. *Rosario Diaz v. Diaz Martinez*. 94-2184 (HL). D
James McGinnis, Detroit. *Jackson v. City of Detroit*. 94-70453 DT. T

May, 1996

Joseph Virgilio, Los Angeles, *Contreras v. City of Los Angeles*, BC11519, T
Dwight Ritter, San Diego, *Kisielius v. City of San Diego*, 684393, D
Charles Woods, San Diego, *Price v. County of San Diego*, 94-1917R(AJB), D

June, 1996

Eric Hewko, West Palm Beach, FL., *Dorcely v. City of West Palm Beach*, CL 92-7560 AD, D
Michael Avery, Boston, *Rodriguez v. City of New Bedford, MA.*,
Robert Lohbeck, Albuquerque, *Archuleta v. New Mexico State Police*, CIV 95-1274 MV-DJS, D
Dwight Ritter, San Diego, *Kisielius v. City of San Diego*, 684393, D
Peter Neufeld, New York City, *Nolan v. City of Yonkers*, 92 Civ. 5067 (KMW), D

August, 1996

George Markopoulos, Lynn, MA., *Raymer v. City of Lynn*, 94-11649-NG, D
Ken Slinkman, West Palm Beach, *Canavan v. City of Del Ray Beach*, 95-8414-Civ-LENARD, D
Alvarene Owens, Dayton, OH, *Kennedy v. City of Dayton*, C-3-95-226, D
Tom Adler, San Diego, *Dimeo v. County of San Diego*, 692628, D

September, 1996

Ernest Jarrett, Detroit, *Facen v. City of Detroit*, 94-414-320 NO, D
Kari Mitchell, Detroit, *Johnson v. City of Detroit*, 95-503695 NI, D
Richard Holley, Ventura, CA., *State of CA. v. Tuffree*, T
Blair Brown, Washington, DC, *Coleman v. District of Columbia*, 89-9305, T
Barbara Fromm, Tallahassee, *Sartain v. Miller*, 95-5079-CAD, T

October, 1996

Peter Berkowitz, San Juan, *Grand Cid Camilo v. Diaz Martinez*, 95-1540 (CC), D

November, 1996

Sheila Reid, San Francisco, *Turner v. Struckman*, C 94-1357 CAL, D

December, 1996

John Jacobson, Oklahoma City, *Myers v. County of Oklahoma*, CIV-94-246-C, T
Alexander Bok, Boston, *Ferreira v. City of Fall River*, 92-02412, T

January, 1997

Robert Hernandez, Boston, *Stone v. City of Taunton*, 95-10031-MLW, T

February, 1997

Geoffrey Wells, Santa Monica, *Davis v. U.S.A.*, SA CV 94-0006.0007.0608 LHM, T
Mary Howell, New Orleans, *Theriot v. Estrada*, 95-0325, D

March, 1997

Peter Horstmann, Boston, *Pollow v. City of Memphis*, 93-3101 H, D
William Bloss, New Haven, *Deneka v. City of New Haven*, 3-L95 CV01451 (JBA), D

April, 1997

Richard Stewart, Phoenix, *Clouse v. State of Arizona*, CV 96-00450, D
Ernest Jarrett, Detroit, *Gates v. City of Memphis*, T

May, 1997

Joe Fine, Albuquerque, *Terrones v. County of Bernalillo*, CV-96-00268, D
James Easterly, St. Paul, MN., *Mickel v. Simmons*, C5-96-004376, T
Robert Lohbeck, Santa Fe, *Archuleta v. New Mexico State Police*, CIV 95-1274 MV-DJS, T

June, 1997

Scott Frerichs, Phoenix, *Mallett v. City of Phoenix*, D
Ed Daley, Boston, *Biron v. Betters*, 96-195-P-H, D
Mary Cronin, Phoenix, *Clouse v. State of Arizona*, CV 96-00450, T

July, 1997

David Thompson, Carlsbad, CA., *Metzger v. Erickson*, 243259, D/T
Tom Beck, Los Angeles, *Buck v. Tolley*, USDC CV 92-5422 RG (Cbx), T
Tom Adler, San Diego, *Hernandez v. City of San Diego*, SDSC 702654, D

August, 1997

Michael Walsh, West Palm Beach, *Anderson v. City of Port St. Lucie*, 93-846 CA 11, T
Nick Hentoff, Phoenix, *Brower v. City of Phoenix*, CV 94-14873, T

September, 1997

Joe Fine/Phil Davis, Albuquerque, *Martinez v. Mumford*, CIV 96-1219 BB/WWD, D
Melvin Brooks, Chicago, *Sanders v. City of Chicago*, 91 L 7200, T
Tom Adler/Mike Marrinan, San Diego, *Hernandez v. City of San Diego*, SDSC 702654, T

October, 1997

William Pickett, Kansas City, MO., *Jones v. Board of Police Commissioners*, 96-0612-CV-W-2, D
Judith Berkan, San Juan, Puerto Rico, *Sambrana v. Suarez*, 94-1212 SEC, T

November, 1997

Charles Woods, San Diego, *Price v. County of San Diego*, 94-1917R(AJR), T
Jeffrey Pop, Beverly Hills, CA., *Escatell v. County of San Diego*, 92-561-K(M), T
Ernest Jarrett, Detroit, *Martin v. City of Detroit*, D
Ernest Jarrett, Detroit, *Black v. City of Memphis*, 93-2324 HBRE, D

December, 1997

John Johnson, Memphis. *Forrest v. City of Memphis*. 96-2157 TUV. T

January, 1998

Richard Waples, Indianapolis. *Love v. Bolinger*. IP 95-1465-C-B/S. D/T

Andrew Marshall, Athens, GA.. *Murray v. Athens-Clarke County*, 3:96-CV-132(DF). D

February, 1998

William W. Kurnik, Arlington Heights, IL.. *Cefalu v. Village of Elk Grove*. 94 C 1990. T

Richard L. Gullixson, Los Angeles. *Kosma v. City of Hermosa Beach*, CV-96-5494 MRP (Shx). D

Dick Treon/Ray Norris, Phoenix. *Mallet v. City of Phoenix*. T

March, 1998

David Wood/Samuel Paz, Los Angeles. *Frias v. City of Torrance*. CV95-6459-WMB. D

April, 1998

William Pickett, Kansas City, MO.. *Jones v. Board of Police Commissioners*. 96-0612-CV-W-2. T

Larry Levantahl, Minneapolis. *Holmberg v. Lanasa*. T

May, 1998

James Krasnoo, Andover, MA.. *Makris v. Town of Salem, NH.*. C-97-330-SD. D

June, 1998

Daniel Clements, Baltimore. *Petitite v. Town of Port Deposit*. S 93-9347 22098-47-695. D

David Switalski, Tallahassee. *Stewart v. City of Sneads*. 4:97CV411-WS. D

Michael Avery, Boston. *Hirshenfang v. City of Boston*. 93-4903-E. T

July, 1998

Stuart Gordon, Chicago. *Wilson v. Smrha*. 93 L 12490. D

Michael Zidek, Wheaton, IL.. *Johnson v. Landrum*. 94 L 15. D

Jeffrey Tabb, Greenbelt, MD.. *Rutledge v. District of Columbia*. 95-2238 (EGS). D

August, 1998

Stephen Roach, Boston. *Cox v. City of Boston*. 95-12729-WGY. D

September, 1998

Patrick Vastano, Los Angeles. *Oram v. GLOCK*. 290597. D

Jeffrey Scott, Philadelphia. *Vetensntein v. City of Philadelphia*. No. 3494 APRIL TERM. 1994. D

November, 1998

Larry Fuller/John Mallah. Miami Beach. *Mendelson v. City of Miami Beach*. 89-36054 (12), T
Brad Hall, Albuquerque. *Leghart v. City of El Paso*. EP-98-CA-235-D8. D

December, 1998

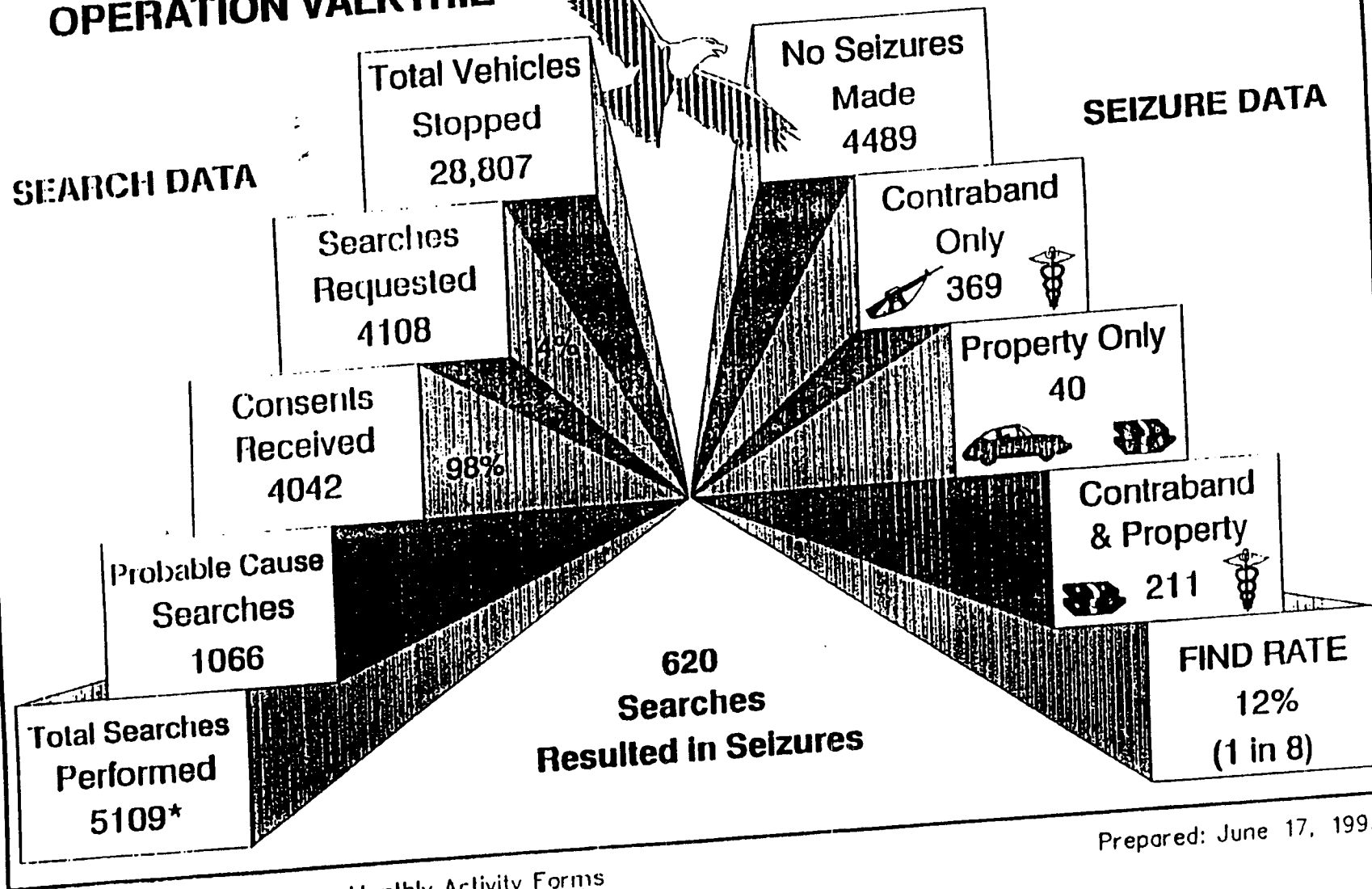
Allan Guttman. Fort Lauderdale. *John Clements Grand Jury*, T

ILLINOIS STATE POLICE - DIVISION OF OPERATIONS

DEDICATED VALKYRIE TEAM ACTIVITY

OPERATION VALKYRIE

CALENDAR YEAR 1992



Data Source: Valkyrie Team Monthly Activity Forms
 * Includes one Warrant search.

Prepared: June 17, 1993

ILLINOIS STATE POLICE - DIVISION OF OPERATIONS
DEDICATED VALKYRIE TEAM ACTIVITY
CALENDAR YEAR 1992

9511-10-0001

	Total Vehicles Stopped	Total Searches Performed	Consent Rate	Search:Stop Ratio	Number of Seizures	Seizure Rate	Seizure:Search Ratio
D4	2,249	1,021	99.9%	1:2	48	4.7%	1:21
D5	3,689	161	97.6	1:23	22	13.7	1:7
D6	3,806	329	98.5	1:12	42	12.8	1:8
D7	3,456	386	97.4	1:9	90	23.3	1:4
D9	3,282	551	98.0	1:6	37	6.7	1:15
D10	3,007	469	93.5	1:6	104	22.2	1:5
D11	3,337	1,260	98.8	1:3	61	4.8	1:21
D12	1,639	170	97.1	1:10	60	35.3	1:3
D13	1,140	407	99.2	1:3	84	20.6	1:5
D17	3,202	355	99.1	1:9	72	20.3	1:5
TOTAL / AVERAGE	28,807	5,109	98.4	1:6	620	12.1	1:8

Data Source: Monthly Team Activity Forms
 Prepared: June 23, 1993