

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

LAUREN HAIDON : NO.: 3:19-cv-00119 (SRU)
 :
v. :
 :
TOWN OF BLOOMFIELD, PAUL HAMMICK, :
BRENDAN DANAHER, ZACHARY :
KLOMBERG, MATTHEW SUPLEE AND :
OTHER KNOWN OR UNKNOWN OFFICERS :
OF THE BLOOMFIELD POLICE :
DEPARTMENT : JANUARY 3, 2022

DEFENDANT'S EXPERT DISCLOSURE

Pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, the defendant, **Brendan Danaher** (hereinafter "defendant"), hereby provides notice of the following expert witness:

1. Mr. John "Jack" J. Ryan
Co-Director of the Legal and Liability
Risk Management Institute
700 N. Carr Rd., # 595
Plainfield, Indiana 46168

The following documents, which provide the information required by Fed.R.Civ.P. 26(a)(2)(B), are attached hereto and incorporated by reference:

- (i) Expert Report of John J. Ryan, dated December 28, 2021 (attached as **Exhibit A**);
- (ii) Jack Ryan Current CV – Schedule A Cases (attached as **Exhibit B**);

- (iii) Jack Ryan Current CV – Schedule B Publications (attached as **Exhibit C**);
- (iv) Jack Ryan Current CV – Schedule C Speaking and Training (attached as **Exhibit D**); and
- (v) A retainer agreement outlining Mr. Ryan’s fees for professional services in this case (attached as **Exhibit E**).

The defendant reserves the right to supplement and/or amend this disclosure as may be necessary prior to trial.

DEFENDANT,
BRENDAN DANAHER

By /s/ Kristan M. Maccini
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CERTIFICATION

This is to certify that a copy of the foregoing has been sent via electronic delivery to the following pro se parties and counsel of record on this 3rd day of January, 2022.

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/s/ Kristan M. Maccini
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UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

LAUREN HAIDON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 3:19-cv-00119 (SRU)
)	
BRENDAN DANAHER, individually and in)	
his capacity as a Town of Bloomfield Police)	
Officer,)	
)	
Defendant.)	
)	

Expert Report of John J. Ryan

1. My name is John Ryan. I have been actively involved in police practices and law enforcement since 1981. I was an active police officer for twenty years in Providence, Rhode Island. In the final year of my active career and since my retirement in June of 2002 from police services, I have been involved in police and law enforcement practices as a private consultant regarding law enforcement issues.
2. My education includes a Bachelor of Science Degree in the Administration of Justice from Roger Williams University in Bristol, Rhode Island; a Master of Science Degree in the Administration of Justice from Salve Regina University in Newport, Rhode Island and; a Juris Doctor Degree from Suffolk University Law School.
3. From 1993 until 2002 I served as an adjunct faculty member in the graduate Administration of Justice Program at Salve Regina University in Newport, Rhode Island. In that capacity I was responsible for graduate courses on Constitutional Issues in Law Enforcement; Police Misconduct/Civil Liability; Managing Police Organizations;

Contemporary Issues in the Justice Field; Juvenile Justice; Mental Health Law; and Business Crime.

4. I am currently the co-director of the Legal and Liability Risk Management Institute along with James Alsup, and Lou Reiter. In that capacity, I author and edit the institute's legal update service for law enforcement. This update service and an archive of all articles that I have written can be found at www.llrmi.com. Additionally, I provide multiple online video roll-call trainings annually for both the road and jail operations. This online roll-call series is a subscription service offered by the Legal & Liability Risk Management Institute.
5. As part of the Legal and Liability Risk Management Institute, I also conduct policy, training, and operations reviews for law enforcement agencies and jails throughout the United States. These reviews focus on the manner in which agencies treat the critical tasks in law enforcement and jail operations. As part of these reviews, I assist agencies in identifying areas in policy, training and operations that may be improved upon to bring the agency within the legal mandates and generally accepted practices in law enforcement and jail operations.
6. Since 1993, I have conducted numerous training sessions for public employees. Participants in this training have included law enforcement officials, school officials, attorneys, and judges. The trainings I have provided are detailed in my CV. Law enforcement officers' bill of rights/due process in administrative investigations.
7. I am a former police Captain of the Providence Police Department in Providence, Rhode Island where I served for twenty years before retiring in 2002. During my tenure as a police officer, I served in the following capacities: patrol officer in both the Patrol Division

and the Tactical Unit; a detective in the Detective Bureau; a sergeant in the Patrol Division; a lieutenant in the Patrol Division; Director of Training; Director of the Department's Office of Public Affairs and; Director of the Department's Administrative Staff. During most of my career, I also took an active role in researching and authoring department policy.

8. Since my retirement in June of 2002, I have taught numerous courses on police policy and procedure, arrest, search and seizure, use of force, police pursuits, dealing with the mentally ill, emotionally disturbed, and suicidal, domestic violence, law enforcement's response to autism, law and best practices in the internal affairs process, civil liability for law enforcement agencies, and specialized courses for narcotics officers, SWAT commanders, and internal affairs officers. Participants in these courses have come from thousands of law enforcement agencies around the United States. Officers in attendance have come from departments with under ten sworn officers and departments with sworn officers numbering in the thousands. These programs are conducted numerous times annually throughout the United States and also include online courses on these topics for law enforcement.
9. The course on policy and procedure focuses on critical tasks in law enforcement and includes, inter alia, policy issues relating to use of force; police pursuits; domestic violence; sexual harassment and external sexual misconduct; off-duty conduct; hiring & retention issues; internal affairs; supervisory practices; search and seizure; property and evidence; care, custody, and transport of prisoners as well as training issues relating to critical tasks in law enforcement.

10. The programs on High Risk Critical Tasks/Best Practices in Law Enforcement includes instruction on Use of Force including inter alia: dealing with individuals of diminished capacity i.e. emotionally disturbed, mentally impaired; and suicidal, excited delirium, as well as persons with disabilities and use of electronic control devices; Search-Seizure and Arrest; Pursuit and Emergency Vehicle Operation; Care, Custody, Control, and Restraint of Prisoners; Domestic Violence; Off-Duty Conduct; Sexual Harassment, Discrimination, and Misconduct; Selection and Hiring; Internal Affairs; Special Operations; and Property and Evidence.
11. As a co-director of the Legal & Liability Risk Management Institute I regularly research and draft policies for law enforcement agencies and jails relating to high-risk critical tasks including use of force, arrest-search & seizure, pursuit, emergency vehicle operation, special operations, internal affairs, hiring and selection-retention of officers, care-custody-control & restraint of prisoners, sexual harassment-discrimination & sexual misconduct, domestic violence, arrest procedures, care, custody, and control of persons with disabilities, and dealing with the mentally ill. In addition, I write, record, produce and distribute online training videos for law enforcement nationwide.
12. Since 2002, I have been involved in the auditing of law enforcement operations throughout the United States conducting several audits annually based on either a need or as a proactive measure of agency performance in the high liability areas of the road and jail operation. I have been involved in assisting dozens of departments nationally through these audits in developing policy, training, and enhancing operations for law enforcement services.

13. My experience, training, and background are more fully described in the attached curriculum vitae, which I incorporate by reference to this report.
14. I have reviewed the following materials to date regarding this case: See Schedule D
15. This expert report is based upon the materials provided to this date. The opinions presented in this report are based upon my specialized experience, training, and knowledge of police practices as well as my continued research and work with law enforcement nationally. This work includes conducting training for law enforcement around the United States as well as auditing the policies and operations of law enforcement agencies around the United States. My opinions are provided with a reasonable degree of certainty within the fields of law enforcement, police activity, and police administration and supervision. I am familiar with police civil litigation and know the normal phases of discovery. I recognize that there may be additional documentation as the case progresses. If additional material is produced I shall be prepared to supplement this report.
16. At the outset, it is important to note that this report is based upon the facts as presented by the material and specifically avoids drawing conclusions based upon the credibility issues of the parties.
17. The law enforcement event reviewed in this report arises out of an ongoing domestic and child-custody dispute between the plaintiff, Lauren Haidon, and her ex-husband, Matthew Couloute. Mr. Couloute filed a complaint with the Bloomfield Police Department alleging that Haidon had taken their daughter, Sophia Couloute, and moved from the State of Connecticut, in violation of a custody order issued in the State of Connecticut. Following a thorough investigation by Officer Danaher of the Bloomfield Police Department, an

arrest warrant was issued for Lauren Haidon on January 23, 2017, for Custodial Interference in the 1st Degree.

Arrest Warrant

18. That I, Officer Brendan A. Danaher, have been a police officer since August, 2011. I am employed by the Bloomfield Police Department currently assigned to the Patrol Division. I have received specialized training in the investigation of criminal and other matters. The facts and circumstances contained in this affidavit are from personal knowledge, investigation, and information supplied by brother and/or sister officers, or others acting in their official capacity.
19. That, on January 11, 2017, at approximately 20:46 hours I met with MATTHEW COULOUTE, DOB: 01/02/1970, at Bloomfield Police Headquarters in Connecticut on a child custody issue. COULOUTE, who has had continuous incidents with his now ex-wife, LAUREN HAIDON, DOB: 08/26/1982, stated HAIDON had violated their child custody agreement.
20. That, COULOUTE showed me the Separation Agreement dated April 23, 2015, from the Superior Court in Hartford (Docket# HHD-FA-14-4073278-S) specifically paragraph #6 under the section titled "Custody and Parenting Plan" which states "In addition to the foregoing, the parties shall have joint custody of the minor child (Sofia Couloute, DOB: 01/31/2011). Neither party shall remove the minor child permanently from the State of Connecticut without prior written approval of the other party or Court order."
21. That, COULOUTE stated the last time he saw his daughter, SOFIA, it was October 2016 and HAIDON had SOFIA at 212 Duncaster Road in Bloomfield where HAIDON was staying with a male and his family. COULOUTE stated he believed SOFIA was there

when HAIDON stated she was not there anymore and was staying at a Marriott Hotel. COULOUTE stated after that he found out through e-mail exchanges with HAIDON that she was in New York State however she would not tell him exactly where. COULOUTE stated he asked West Seneca Police Department to do a welfare check at HAIDON'S parent's residence (81 LibertyLane, West Seneca, NY) however they found that HAIDON and SOFIA were not there. COULOUTE stated West Seneca Police Department did eventually locate SOFIA and HAIDON but would not disclose to COULOUTE where they were staying based on statements HAIDON made to law enforcement.

22. That, COULOUTE stated since HAIDON has been in New York State she was able to achieve temporary custody of SOFIA in New York however in Connecticut COULOUTE was able to file for contempt (which was granted) as HAIDON disregarded the child custody agreement. The signed order, which I viewed, clearly states that HAIDON needed the Connecticut courts permission or COULOUTE'S written permission. COULOUTE provided the documentation that showed neither he nor the Connecticut court approved HAIDON'S unknown relocation of SOFIA to New York State. COULOUTE stated he had e-mails where he asked HAIDON where SOFIA was and she still refused to tell him. COULOUTE stated he believed this was a custodial interference issue and wanted to press charges.

23. That, on January 11, 2017 at approximately 21:35 hours I spoke to Disp. DAVID VASQUEZ of the West Seneca Police Department. Disp. VASQUEZ was the Individual who spoke to COULOUTE when he originally requested the welfare check. Disp. VASQUEZ stated his officers checked HAIDON'S parent's residence who informed them that SOFIA and HAIDON were at another relatives residence but they were fine and did

not want to or simply did not disclose HAIDON'S location to the officers. Disp. VASQUEZ stated COULOUTE was not pleased with their welfare check outcome and failed to mention that HAIDON was in violation of a child custody agreement.

24. That, at approximately 21:55 hours I left a voicemail for HAIDON informing her of the situation and requested that she call me back so that we can establish a plan for the return of SOFIA to the State of Connecticut as I believe she is in violation of the child custody order. HAIDON called me back shortly after and confirmed that she was staying with her parents in West Seneca but did not want COULOUTE to know because of the history of abuse and the fact that she believes COULOUTE wants to kill her. HAIDON denied violating the order stating that she is not allowed to "permanently" relocate without COULOUTE'S permission and that she has only "temporarily" relocated to New York. HAIDON stated however she does not have any residence in Connecticut anymore and this is where she is staying to protect her daughter. I informed HAIDON that her temporary custody order granted in New York did not supersede Connecticut's order and she stated she understood. HAIDON then stated that she had e-mails from COULOUTE where he told her she could go to New York and did not care. HAIDON also stated she forwarded her address in New York to the Connecticut courts however it does not meet the condition of written permission from COULOUTE or the court.

25. That, after speaking to both individuals they sent me approximately a dozen e-mails showing various text message and e-mail conversations. After reviewing the e-mails specifically I believe COULOUTE was originally told by HAIDON that she was at her parent's residence in West Seneca ("Buffalo") however HAIDON gave COULOUTE the impression that she was kicked out and I observed many e-mails where he requested

HAIDON'S specific address solely for the purpose of seeing SOFIA. During our phone conversation HAIDON stated that she did not want COULOUE to know where she and SOFIA are, which is a violation of the custody agreement I reviewed.

26. That, based on the facts and circumstances contained herein, I have probable cause to believe that LAUREN HAIDON, DOB: 06/26/1982, has committed the crime of CGS 53a-97 Custodial Interference in the 1st Degree. I respectfully request that a warrant for the arrest of LAUREN HAIDON be issued.

Separation Agreement 4/23/2015 (Custody and Parenting Plan)

Superior Court of Connecticut/Hartford

27. "In addition to the foregoing, the parties shall have joint custody of the minor child. Neither party shall remove the minor child permanently from the State of Connecticut without prior written approval of the other party or Court order. It is contemplated that the plaintiff may seek to relocate to a geographic area other than the New York/NewJersey area. In such case, the plaintiff may petition the Court for permission to relocate and in such circumstances the Court shall decide whether to hear the matter de novo as an initial custody determination or as a post judgment relocation pursuant to General Statutes § 46b-56d. Neither party shall be precluded from requesting that a new family relations study be accomplished and/or a guardian ad litem be appointed. In such circumstance, there shall be no requirement that there has been a substantial change in circumstances."

New York Petition By Haidon (January 9, 2017)

28. The petition filled out by Haidon in New York, clearly sets forth the jurisdictional requirements for the court's jurisdiction. It is also noted that Haidon lists her residence as 81 Liberty Lane West Seneca, New York.

4. This Court has jurisdiction to issue a child custody or visitation order pursuant to Section 76(1) of the Domestic Relations Law on the following ground(s) [check all applicable box(es)]:
- a. ☐ this state is the home state of the child on the date of the filing of this petition; this state was the home state of the child within six months before the filing of this petition; and the child is absent from this state but the following parent or person acting as a parent continues to live in this state [specify]: _____;
- OR
- b. ☒ the child and the child's parents, or the child and at least one parent or a person acting as a parent, have a significant connection with this state other than mere physical presence; and substantial evidence is available in this state concerning the child's care, protection, training, and personal relationships; and EITHER
- [check applicable box]: ☒ a court of another state does not have home state jurisdiction under paragraph (a); OR ☐ a court of the home state of the child [check applicable box]: ☐ has declined ☐ should decline to exercise jurisdiction on the ground that this state is the

² Inapplicable if Respondent is based at a permanent duty station or has had a permanent reassignment of station.

Form UCCJEA-1 Page 3

more appropriate forum under Domestic Relations Law §§76-f or 76-g, because [specify]: _____

OR

- c. ☐ all courts having jurisdiction under paragraph (a) or (b) of this subdivision [check applicable box]: ☐ have declined ☐ should decline to exercise jurisdiction on the ground that a court of this state is the more appropriate forum to determine the custody of the child under Domestic Relations Law §§76-f or 76-g, because [specify]: _____

OR

- d. ☐ no court of any other state would have jurisdiction under the criteria specified in paragraph (a), (b) or (c). NEITHER PARENT OR CHILD RESIDE IN CT. MINOR CHILD RESIDES WITH MOTHER IN WEST SENeca, NY

29.

30. It is noted that the petition, filed in New York, has handwritten in, "Father abandoned all custody order per State of CT." and stated, "Father is extremely abusive, is a flight risk, has former criminal clients looking for him, has abused mother and child extensively for years." Haidon wrote that Couloute abandoned Sophia on 10/15/2016.
31. The petition, does indicate that custody had been previously determined by the Hartford Superior Court on April 23, 2015.

E-mails

32. In an October 14, 2016 (4:30 p.m. email) Couloute wrote: "I don't know who your listening to or what you think is happening. I've tried to get on the same page as you so that we both can move on. I do not let you try to pretend that abandoning you here in CT. That's not what's going on. No one has time to play this game you insist on playing. You're going to Buffalo, go Just give me time with my daughter. If we can't figure this out, I'll bring another load of things to Atlanta and come back for my visitation."
33. On October 19, 2016 at 10:57 a.m. and referencing an email from 10:52 (five minutes earlier) Haidon wrote: Dear Matt, Please provide me with the address of where you and xavier are living in Georgia. You have refused to be forthcoming with any information regarding the specifics of your relocation, and have lied about where Xavier was. Please provide the exact address of where you are living. Your mother conformed you are no longer living at 50 duncaster rd. in Bloomfield, Ct."
34. On October 19, 2016 at 11:19 a.m. Couloute wrote to Haidon: We just had a phone conversation about where I am and you are aware of the address from documents you've taken. My mother has spoken to you only briefly as she doesn't believe your motives in any conversations are good. Regardless, as discussed and as innumerable text messages

and emails, I am in Georgia seeking employment. As Xavier obtained an opportunity to attend an excellent private school here, I wish the same for Sophia wherever she ends up residing. It is my understanding that you had to leave your residence with Andrew Jensen and are now in Buffalo with our daughter after not having a place to stay. That being the case, I am requesting that we work out a parenting plan that will take into account our geographical changes. Please let me know how you would like to proceed as if we are unable to come to an agreement I will have to secure my rights in court. It is unacceptable that I cannot have access to our daughter, cannot arrange visits, and cannot structure a temporary plan until employment and living arrangements are solidified. I wish to remind you that filing inaccurate court documents is illegal and the suggestion that I "abandoned" Sophia is not true. Further, I have kept all the text messages and emails regarding our discussions prior to me seeking employment in Georgia as well as conversations regarding your want to move to Buffalo and me joining you as well as the conversations regarding the continued harassment that you were subjected to while living at the Jensen residence by Andrew and his mother. So please, I will not be accused of abuse, abandonment, rape, molestation or any other deviant activities so that you can attempt to secure sole custody in NY. Again, at your convenience, please let me know when and how we can come to a resolution. Thanks.

35. In an email dated 10/19/2016 11:57 a.m., Couloute informed Haidon, "We are staying at my mother's home at: 3210 Lakeheath Dr. Cumming, GA. 30041." It is noted that this email was in response to Haidon's email asking for the address in which Couloute is living.
36. On November 7, 2016 at 8:18 p.m. Haidon wrote: "Dear Matt, Please let me know when you will be coming to buffalo to see Sophia."

37. On November 7, at 8:25 p.m. Coulotte responded “I’ve been trying to Skype Sophia. Can you please have her Skype me. As soon as I am financially able to get to Buffalo I will. Last week you were coming here. I guess that’s not the case. Regardless, I’d like to Skype, I’ve tried twice tonight already to no avail.”
38. On December 31, 2016 at 5:33 Couloute wrote, “This is the second time in the past 10 days that I can’t reach you to check on Sophia. If I don’t hear from you soon, and skype with Sophia ill be forces to send the police to your parents home for a wellness check. So please, this is not a game and is not about you, its about our childa well being. Matt”
39. On December 31, 2016 at 6:48 p.m., Haidon responded, “Sophia is safe, with me, and having fun...and you know this. We are celebrating New Year’s Eve and she is with a group of kids playing games. Sophia will call you tomorrow The police have already been notified of your threats this evening. Happy New Year to you, and Xavier. Thank you, Lauren.”

Pro-Se Motion Filed by Lauren Haidon

40. On 11/21/16 Haidon filed a pro se motion “notice regarding co-parenting orders, post judgment, notifying the Connecticut Superior Court that Couloute had moved to Georgia.

Motion filed by Coulotte 1/5/2017

41. On 1/5/2017 Coulotte filed a motion in the Connecticut Superior Court seeking a modification of the original custody order to require Haidon to return Sophia to Connecticut and to grant Coulotte primary custody. The motion notes “Plaintiff [Haidon] relocated the child out of the State of Connecticut without court order. Hidden the child, and refused visitation.” In accord with this motion, Haidon was commanded to appear on January 31, 2017.

Brendan Danaher Deposition

42. Danaher acknowledged that he has worked at the Bloomfield PD since January of 2012. (20).

43. Danaher stated that the child custody statutes were discussed in the police academy. (33).
Danaher stated the following about on the job training regarding child custody: "I had a other case while I was training a newer officer involving custodial interference." (34).

44. Danaher stated that he met Matt Couloute prior to 2017. (46). Danaher reported the following about the context in which he met Couloute: "There was an issue where Miss Haidon wanted Mr. Couloute to stop driving by her residence." (46).

45. Danaher acknowledged that he met with Couloute at the police department in January of 2017. (85).

46. Danaher reported the following about the nature of Couloute's issue: "Basically that his custodial rights weren't being accepted by Miss Haidon and he wanted to see his daughter, and, yeah." (92).

47. Danaher stated that Couloute was staying at Couloute's mother's house in Connecticut. (175).

48. Danaher reported the following about whether he thought Haidon's move to New York was permanent: "Well, I believe that it wasn't temporarily. The move to New York itself as a state was not temporary." (175).

49. Danaher acknowledged that Haidon told him she was staying with her mother and father. (176).

50. Danaher acknowledged that he charged Haidon with felony custodial interference. (177).
Danaher acknowledged that this felony charge was based on his reading of the separation

agreement and specifically paragraph six which said that Haidon could not permanently relocate to another state. (177-178).

51. Danaher stated that he did not know that Couloute had a job in Georgia. (200). Danaher stated that he did know that Couloute had enrolled his son in school in Georgia. (200).

52. Danaher acknowledged that Haidon sent him an email where Couloute wrote to Haidon, "You're going to Buffalo, go". (226). Danher stated that he believes Haidon told him that this was her basis for believing that she had permission to take Sophia to New York. (226).

53. Danaher testified to the following about the issue of permission to relocate: "So it's if vague, I should have something direct and clear that says I gave you permission to relocate my daughter to Buffalo. And I would say, look, that's the clear, direct permission you gave her. "Go to Buffalo, go," it doesn't have a lot of context to it." (229).

54. Danaher stated the following about the two and half month delay where Couloute had not made an issue of the move: "Correct. And I asked him about it, as I told you. I asked him why the length of time from October that you were upset with this until January And then there were more recent emails showing requests to bring the child back that were either ignored or refuted." (230).

55. Danaher stated the following about when he found out that Couloute's Connecticut license had been cancelled: "I believe it was cancelled approximately a week after the complaint was made." (240).

56. Danaher testified that he does not believe he asked Couloute about his job at UPS. (246).

57. Danaher testified that Haidon sent him emails saying that Couloute's son was enrolled in school in Georgia and she also sent him an email where Couloute said his address was in Georgia. (247).

58. Danaher testified to the following about the issue of Couloute living in Georgia: "I took what she said seriously. That's why he and I discussed it several times, and we looked at the vehicle with Connecticut plates that was arriving at the PD, the fact that he was available in person in Bloomfield at essentially anytime, and I believe I had emails where he said he was in New York for business and staying in Connecticut business, work." (247-248).

Deposition of Paul Hammick

59. Hammick is the Chief of Police at the Bloomfield Police Department. (12).
60. Hammick does not recall any internal affairs investigation relative to Danaher's arrest of Haidon. (63-64).
61. Hammick testified that officers get recertification training in domestic violence every three years through the police academy. (76-77).

Deposition of Matthew Suplee

62. Suplee is a lieutenant with the Bloomfield Police Department. (13).
63. Suplee reported the following about the training that Bloomfield PD provides to its sworn officers: "There is a mandatory -- every three years, there's a mandatory amount of certification training that you need. It's about a week, five eight-hour classes. That's set by the state. Their schedule is set by the state. We have to send people -- you have to go at least every three years. So that's a minimum." (16-17).
64. Suplee testified that he has done a couple of investigations with Haidon and Couloute. (54). Suplee testified that the investigation was in 2014. (55).
65. Suplee testified that Haidon and Couloute made frequent complaints to the Bloomfield PD which were investigated. (57).

Deposition of Zachary Klomberg

66. Klomberg is a detective sergeant with the Bloomfield PD and was a patrol sergeant in 2017. (10).
67. Klomberg stated that he did not discuss the Haidon arrest with any of his superiors. (60). Klomberg does not know of any lieutenants, captains, or the chief being involved in the decision to arrest Haidon. (60).
68. Klomberg acknowledged that Danaher was the investigating officer and Klomberg was the supervising sergeant. (61).
69. Klomberg acknowledged that he and Danaher made the determination that there was a custodial interference felony committed by Haidon. (61).

Deposition of Lauren Haidon Vol. I

70. Haidon stated the following about receiving a voicemail from Officer Danaher on January 11, 2017: "I don't recall exactly what he stated. It had something to do with Mr. Couloute showing up to give a report trying to claim that I had illegally removed Sophia from the state and that Mr. Couloute had claimed that he was still living at 50 Duncaster Road, which was his mother's address." (66).
71. Haidon stated the following about what she told Officer Danaher when she made contact with him: "I explained to Officer Danaher that Mr. Couloute had abandoned Sophia and I and that he had relocated down to Georgia; that Mr. Couloute was a resident of Georgia and had obtained a Georgia driver's license on December 28, 2016. He was also employed by UPS down in Georgia and that he was lying to Officer Danaher about the circumstances. I also tried to inform him that Mr. Couloute was involving Attorney Ryan McGuigan, who had quite a bit of political ties and influence as to what went on up there

at Bloomfield police. We discussed that. And I had provided Officer Danaher with multiple emails and conversations that were had between Mr. Couloute and I, between my attorneys and Mr. Couloute. I also informed Mr. Danaher that Sophia and I were under a protective order from Erie County family court. And upon learning of the protective order, within an hour, Mr. Couloute got in the car and drove to Connecticut, waited 20 hours until Officer Danaher was on shift, and then decided to give a false complaint. I had provided Mr. Danaher with the emails of Mr. Couloute allowing me to go. I had provided Mr. Danaher with all of the emails where my attorney and I both extended offers of visitation. There was no order allowing Sophia to travel to Georgia. She was only 4 years old at the time. And Mr. Couloute never made a point to say he would be returning her.” (67-69).

72. Haidon acknowledged that she told Officer Danaher that she did not have a residence in Connecticut. (70).

73. Haidon stated that other than the January 11, 2017 phone calls she believes her other communications with Officer Danaher were via email. (72).

Opinions

74. It is my opinion, based on my specialized background, education, training, and experience as well as my continued research, authoring, auditing, consulting and training on law enforcement practices nationwide, that the decision of Officer Danaher after conferring with his supervisor to seek an arrest warrant for Ms. Haidon was consistent with generally accepted policies, practices, training and legal mandates trained to officers for application in field operations.

75. As part of Domestic Violence training officers throughout the United States receive training on the Uniform Child Custody Jurisdiction Act. The act, approved in 1997 eliminated the concept of physical presence in a state as creating jurisdiction. Instead, the act gives jurisdiction to the Home State-which is the state in which that child had been living for at least six months preceding commencement of the action. This act, which has been adopted by the State of Connecticut limits the ability of a sister state to modify an existing child custody determination except in limited circumstances such as the child lives in the new state with a parent and has been or is under a threat of being abused or mistreated by a person in the state where jurisdiction exists, and the court determines it is in the best interest of the child to modify the custody determination. I would note that since all jurisdictional issues relate to the child, the home state, and the court that issued the custody order, whether Couloute was staying in Georgia temporarily or permanently would not impact an officer's determination of custodial interference. The issued orders control the movement of the child, not the movement of the parent with visitation rights. Thus, Officer Danaher's conclusion that the initial Connecticut order superseded the new order obtained by Haidon in New York was consistent with what officers are instructed during training on domestic violence and custodial interference.

76. Suggestions by plaintiff's expert that these complex cases must be left to the courts disregards the fact that law enforcement is charged with the executive duty of enforcing laws. Law enforcement officers take an oath to enforce the law. Law enforcement does not legislate or interpret the law and the other branches of government do not enforce the criminal law. Thus, law enforcement is responsible for the enforcement of laws related to custodial interference. While these cases are complex they must be handled by local law

enforcement. I note that with nearly half the departments in the United States being less than ten officers, it is inconsistent with the practical realities of law enforcement to expect specialists to handle such cases.

77. Officers throughout the United States are trained that a justification for deprivation of liberty of a citizen is when an officer has probable cause to believe that the subject has committed a criminal offense. Additionally, training and texts make clear that: “All arrests-whether with or without a warrant –must be based on probable cause. You must have sufficient knowledge of facts and circumstances that would lead a reasonable police officer to conclude that the suspect probably committed the crime.”¹ Officers are informed that the way to ensure that the facts they have developed meet the generally accepted policies, practices, training and legal mandates trained to officers is to seek an arrest warrant before physically making the arrest.

78. All officers are trained on the concept of “totality of circumstances” when considering reasonable suspicion or probable cause. Simply stated, an officer looks at a number of factors, some of which standing alone would not support any law enforcement action, but when grouped together with the other facts in totality, action is justified.

79. All officers are trained that the decision to detain or arrest is based upon all the facts and circumstances known to the officer at the time the arrest is made and not on information that is learned with 20/20 hindsight.

80. Here, Officer Danaher allowed both parties to provide information and evidence related to the custody of Sophia during the investigation. It is noted that there were some

¹ See, The Law Officer’s Pocket Manual 2008 Edition, Miles, Richardson, and Scudellari, The Bureau of National Affairs, Inc. Arlington, Virginia 2008. at §4:2

inconsistencies offered by Haidon in conversations and evidence offered by Haidon. Haidon indicated at points that Coulotte had abandoned the child, yet numerous emails indicated that Coulotte is trying to visit or connect by Skype with the child. There are emails by Haidon asking Coulotte when he will visit in Buffalo, yet Haidon made reports to law enforcement that she was fearful of Coulotte and did not want him to know where she was located. Haidon told Danaher that her move to New York did not qualify as a violation of the order because it was temporary, yet she acknowledged having no residence in Connecticut. It is clear that Officer Danaher provided both parties with ample opportunity to report their opposing beliefs.

81. At the same time, Officer Danaher had a valid Connecticut order that spelled out provisions regarding the movement of Sophia out of state. Any reasonable and well-trained officer would have concluded based on the order, the refusal to provide an address, and the request to police in New York not to reveal the address, that there was sufficient information to conclude that arrest for custodial interference was consistent with generally accepted policies, practices, training, and legal mandates trained to officers for application in field operations.

82. It is well known in law enforcement and officers are trained that there is a distinction between what an officer must establish by way of evidence in order to justify an arrest under the generally accepted practices in law enforcement versus what a prosecutor must establish to bring a case to trial or gain a conviction. Additionally, law enforcement understands that the prosecutorial standard for bringing a case to trial is higher than the standard for arrest. Officers throughout the United States are trained that even when the officer is justified in making an arrest based on the information known to the officer at the

time, new evidence or alibis that undercut the officer's conclusions that are unknown to the officer at the time of the arrest are simply 20/20 hindsight and do not undercut the fact that the officer's arrest was consistent with generally accepted practices.

83. Not all statements that are provided to the police in the course of a criminal investigation are truthful or accurate. Some statements come from persons who have an interest in the outcome of the case and provide police with false or misleading information. There are often conflicting accounts from witnesses of what occurred based on their perspective. This is the type of direct evidence that is presented at suppression hearings, probable cause hearings, and to juries at trial as the finders of fact weigh the credibility of the witnesses and decide the truth of the matter. It is not the job of the officer to determine the facts to be adopted by the fact-finder.

84. It is important to recognize that law enforcement does not work in isolation but rather only plays a role in the opening segment of the administration of justice. Citizens, suspects, and criminal defendants are protected by a number of checks and balances to ensure that law enforcement does not become overzealous through the prosecution of individuals. In all cases a officer's investigation is presented at several levels before a person is actually tried in court. This review would include supervisors, the prosecutor and a judge or neutral and detached magistrate. All of these persons provide a check and balance for the work of the officer and pass judgment on whether or not all aspects of the investigation are proper and whether there is sufficient evidence to proceed. Here, Danaher clearly followed proper steps in discussing the matter with his supervisor and then seeking an arrest warrant based on the information provided through his investigation.

85. Based on all of the foregoing, any reasonable and well-trained officer would have concluded that seeking an arrest warrant for Ms. Haidon and causing the arrest of Ms. Haidon was consistent with generally accepted policies, practices, training, and legal mandates trained to officers for application in field operations.
86. At this stage of my review, I do not know if I may be asked to review additional documents. Should I be asked to review any additional documents, I will be prepared to render additional opinions or supplement the opinions stated within this report.
87. 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.
88. My fees for these professional services are outlined in the attached retainer agreement.

This report is signed under penalty of perjury on this 28th day of December 2021, in Collier County, Florida.

s/John J. Ryan
John J. Ryan

SCHEDULE A

John “Jack” Ryan

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EDUCATION

1990-1994 Juris Doctorate, Cum Laude, Suffolk University Law School
1986-1990 Master of Science, Administration of Justice, Salve Regina University
1981-1986 Bachelor of Science, Administration of Justice, Roger Williams University

EMPLOYMENT

2002- Police Practices Consultant, Trainer, Auditor
2003- Co-Director, Legal Liability Risk Management Institute
1993-2002 Adjunct Professor, Salve Regina University
Administration of Justice Graduate Program
Courses:
Constitutional Issues in Law Enforcement
Police Civil Liability
Juvenile Justice
Mental Health Law
Managing Police Organizations
Business Crime
Contemporary Issues in the Administration of Justice
1982-2002 Police Officer, Providence Police Department
1982-1985 Patrol Officer, Patrol Division
1985-1987 Patrol Officer, Tactical Division
1987-1988 Detective, Detective Division
1988-1992 Sergeant, Patrol Division
1992-1995 Lieutenant, Patrol Division
1995-2000 Director of Training
1995-2001 Department Public Information Officer
1997-2001 Captain, Administrative Staff Division
1998-2001 Director of Administration
2001-2002 Research and Policy

* As Director of Administration for the Providence Police Department-Supervisory Responsibilities included:

- Administrative Staff
- Advisor to Chief of Police and Internal Affairs
- Fleet Operations
- Human Resource Bureau
- MIS
- Property/Evidence
- Prosecution Bureau
- Public Information Office
- Record Bureau
- Training Division

SCHEDULE A

1981-1982 Private Security/Retail

- Uniformed Security
- Retail Store Detective
- Night Supervisor overseeing uniform security as well as store detectives

CERTIFICATIONS:

2009 Certified with TASER by the Muncie Indiana Police Department

AWARDS:

1999 Salve Regina University, Alumnus, Distinguished Service Award
1994 American Jurisprudence Award, Trial Practice
1992 American Jurisprudence Award, Constitutional Law
1991 Moot Court Outstanding Performance Award

LAW ENFORCEMENT ACHIEVEMENT AWARDS:

1996 Chief's Award, Off-Duty Shooting in Progress Arrest
1987 City Council Award, Off-Duty Breaking and Entering Arrest
1986 Rhea Archambault (Officer of the Year) Award
1982-2002 Over 35 Letters of Commendation

PROFESSIONAL AFFILIATIONS:

Rhode Island Bar Association
Fraternal Order of Police
Providence Police Association
International Municipal Lawyers Association

ADMITTED TO PRACTICE OF LAW:

State of Rhode Island, November 1994
District of Rhode Island Federal Court, June 1995

VOLUNTEER ORGANIZATIONS:

Northern Rhode Island Vikings Junior Hockey Association, President 2002-2004
Northern Rhode Island Vikings Junior Hockey Association, Board Member 1998-2003

CASE CONSULTATIONS:

January 2014: Jenny Rebecka Royal v. City of Blythe, Superior Court of Richmond County, Georgia, Civil Action File No: 2012RCCV735 (Deposed 2/24/17) (Defense)
August 2014: Johnathan Rose et al, v. County of Sacramento, et al, U.S. District Court Eastern District of California, Case No. 2:13-cv-01339-TLN-EFB (Testimony 9/22/17) (Plaintiff)
June 2015: Nathan Felts v. Valencia County, et al., U.S. District Court for the District of New Mexico, No: 1:13-cv-1094 MCA/RHS, (Testimony 10/17/17) (Defense)
December 2015: Estate of Dillon McGee v. Madison County, Tennessee, et al., U.S. District, U.S. District Court for the Western District of Tennessee Eastern Division, No.: 1:15-1069, (Deposed 7/31/17) (Defense)
September 2016: Terrylyne Sacchetti, Robert Manganelli, et al. v. Gallaudet University, et al., U.S. District Court for the District of Columbia. Case No.: 1:15-cv-455-RBW (Deposed 6/19/17)(Plaintiff)

SCHEDULE A

November 2016: Estate of Brunette, et al. v. City of Burlington, U.S. District Court of Vermont, No.: 2:15-cv-61. (Deposed 7/26/17)(Defense)

December 2016: Katherine Elizabeth Sikes, individually and as Administrator of the Estate of Gary Thomas Latimer v. City of Douglasville, a municipal Corporation of the State of Georgia; Chief Chris Womack, Mayor Harvey Persons, Damon Partin, and Officer Michael McDonald, U.S. District Court for the Northern District of Georgia, Atlanta Division. Civil Action No.: 1:15-cv-03111. (Deposed 5/10/17)(Defense)

February 2017: Estate of Marquez Smart by Randall Smart & Brenda Bryant as Administrators of the Estate and Heirs of Deceased v. The City of Wichita, Wichita PD, Officers Lee Froese & Aaron Chaffee. U.S. District Court for the District of Kansas. No.: 2:14-cv-02111-EFM-JPO. (Deposed 8/29/17)(Defense)

March 2017: Sureshbhai Patel v. City of Madison, et al. U.S. District Court for the Northern District of Alabama. No. 5:15-cv-00253-VEH. (Deposed 7/28/17)(Defense)

May 2017: Stephen Horn v. City of Covington, et al. U.S. District Court, Eastern District of KY-Covington. No.: 2:14-cv-73-DLB (Deposed 8/30/17)(Defense)

June 2017: Tyrone Zwiegart v. Clinton County, et al. U.S. District Court for the Southern District of Illinois. No.: 3:16-cv-01182-MJR-RJD. (Deposed 9/16/Rose17)(Defense)

July 2017: Sandra Harris, Special Administrator of the Estate of David Harris, Deceased, v. Village of Calumet Park, et al. Circuit Court of Cook County, IL, County Department, Law Division. No.: 2014-L-009643. (Deposed 9/07/17)(Defense)

June 2017: Maria Touchet, Personal Representative for Estate of Rudy Baca v. Valencia County and Seth Chavez. New Mexico Thirteenth Judicial District Court. No.: D-1314-cv-201501125. (Deposed 10/30/17)(Defense)

July 2017: Chaundraya Goodwin, Admx. V. Ohio State Highway Patrol. No.: 2016-00864. Court of Claims of Ohio. (Deposed 10/31/17)(Defense)

October 2017: Baltimore PD v. Officer Caesar Goodson. Trial Board (Employment Disciplinary Hearing). (Testimony 11/6/17)(Defense)

August 2016: Jamie Nelson, et al. v. City of Elizabethtown, et al., U.S. District Court, Western District of KY at Louisville, Case No.: 3:16-CV-429-DJH. (Deposed 12/4/17)(Defense)

April 2017: Megan McGuire v. Douglas County, et al. U.S. District Court-District of Nebraska. No.: 8:16CV4. (Deposed 2/1/18)(Defense)

November 2017: Derrick Wynn v. City of Griffin, et al. U.S. District Court for the Northern District of Georgia, Newnan Division. No. 3:16-cv-94-TCB. (Deposed 2/13/18)(Defense)

August 2017: Neuroth v. Mendocino County, et al. U.S. District Court – Northern District California. No.: 3:15-cv-03226-RS. (Deposed 3/12/18)(Plaintiff)

July 2017: Estate of John Livingston, Tyrone Bethune, Christine Broom, Michael Cardwell, Ryan Holloway, and Wesley Wright v. Kehagias. U.S. District Court, Eastern District of North Carolina. No.: 5:16-cv-906. (Deposed 4/12/18)(Defense)

March 2018: Moses Stryker v. The City of Homewood; Chief Jim Roberson; Jason Davis; Brian Waid; and Frederick Blake. U.S. District Court, Northern District of Alabama, Southern Division. No.: 2:16-cv-00832-VEH. (Deposed 4/17/18)(Defense)

January 2018: Jon Luer, et al. v. St. Louis County, MO. U.S. District Court, Eastern District of Missouri. Case No.: 4:17-cv-767 NAB. (Deposed 5/22/18) (Defense)

April 2015: Ingram v. Camden County, et al., U.S. District Court, District of New Jersey, Docket No. 14-cv-5519 (Deposed 6/13/18) (Defense)

February 2017: Darren A. Dickerson v. County of Camden, et al., U.S. District Court, District of New Jersey. No.: 1:14-cv-06905. (Deposed 6/13/18)(Defense)

December 2017: Francois Severe v. City of Miami and Antonio Vicente Torres, IV. District Court for the Southern District of FL. No. 17-cv-22153-DPG. (Deposed 7/2/18)(Defense)

December 2016: Joshua Skinner v. Alexander Tower, Eric Shepard, Brian Claffy, and Michael DeFiore. U.S. District Court for the District of Vermont. Civil Case No.: 2:16-cv-127. (Deposed 7/23/18)(Defense)

SCHEDULE A

February 2017: Thomas Pryor v. County of Camden, et al., Superior Court of New Jersey, Law Division, Civil Part. No.: L-2767-15. (Testimony 7/27/18)(Defense)

May 2016: Sheila Brawley, Mother and Next Friend of Rhaykeem D. Samuels, a minor, v. City of Madison, et al., Circuit Court Third Judicial Circuit Madison County, Illinois, Case No.:15-L-1505 (Deposed 8/15/18)(Defense)

January 2016: Clark v. Village of Grayslake, et al., Circuit Court of Lake County, (Deposed 8/17/18) (Defense)

May 2016: Robert Bryant v. Camden County Police Department, Jose Gonzalez, and Officer Jacob Levy, Superior Court of New Jersey, Law Division, Docket No.: L-3505-15. (Testimony 9/6/18) (Defense)

April 2018: Anthony Wilson and Kimberly Wilson, the parents of Martez Wilson, and the Estate of Martez Wilson v. Douglasville, Officer Coylee Danley, Officer Andrew Smith, Sgt. Caldwell, EMT Sean Flack and paramedic Brian Porterfield. U.S. District Court, Northern District of Georgia. CAFN 1:17-cv-00634-ELR. (Deposed 9/7/18)(Defense)

May 2018: Angela Ainley v. City of South Lake Tahoe, et al. Federal Court Eastern District of California. No. 2:16-cv-00049-TLN-CKD. (Deposed 9/12/18) (Plaintiff)

January 2018: Cajun Snorton as administrator of the estate of Nicolas Thomas v. Smyrna Police Lt. Kenneth Owens, et al. U.S. District Court, Northern District of Georgia. No.: CAFN 1:17-cv-01036-RWS. (Deposed 9/14/18) (Defense)

May 2018: Estate of Tashi S.Farmer, et al. v. LVMPD, et al. U.S. District Court, District of Nevada. No. 2:17-cv-01946-JCM-PAL. (Deposed 10/19/18) (Defense)

October 2018: John Hernandez, et al. v. City of Sacramento, et al. Eastern District of California. No. 2:17-cv-02311-JAM-DB (Deposed 11/30/18) (Plaintiff)

October 2018: Carolyn Giummo, et al. v. Robert Olsen, et al. U.S. District Court for the Northern District of Georgia. Civ. A. No. 1:15-cv-03928-TCB. (Deposed 12/7/18) (Defense)

November 2018: Bill Stanley, Administrator of The Estate of Brandon Stanley v. Bobby Joe Smith and David Westerfield. U.S. District Court, Eastern District of Kentucky, London Division. No.: 6:16-cv-00264-REW-HAL. (Deposed 12/20/18) (Defense)

July 2016: Tad Woods v. Geraldine Martinez, Twelfth Judicial District Court, State of New Mexico, Case No.: D-1215-CV-2013-00689. (Testimony 1/16/19) (Defense)

July 2016: Bethany Anderson, et al. v. City of Westlake, OH, et al. Court of Common Pleas, Lorain County, OH. No.: 18-CV-194655. (Deposed 1/25/19) (Defense)

December 2018: Smith v. County of Santa Cruz, CA. No. 17-6594 LHK, S.S. v. County of Santa Cruz, CA. No. 17-5095 LHK. U.S. District Court – ND California. (Deposed 3/8/19) (Plaintiff)

July 2014: Fraternal Order of Police v. City of Camden, et al., U.S. District Court for the District of New Jersey, Civil Action No.:1:10-cv-01502 (Testimony 3/18/19) (Defense)

September 2018: Jamie Ann Cox, individually and as successor in interest for Humberto Rosario Martinez, Deceased, et al. v. City of Pittsburg, et al. U.S. District of N.D. Cal. No.: 3:17-cv-04246-RS. (Deposed 3/25/19) (Plaintiff)

October 2017: Mario Alberto Madero, Jr., et al. v. City of Prairie Village, Kansas, et al. District Court of Johnson County, Kansas. No.: 18-CV140. (Testimony 4/16/19) (Defense)

May 2017: Keith Childress, Sr., et al. v. LVMPD, et al. U.S. District Court, District of Nevada. No.: 2:16-cv-03039-JCM-NJK. (Deposed 4/18/19) (Defense)

December 2018: Amanda Hoskins/Jonathan Taylor v. Knox County, et al. U.S. District Court, Eastern Kentucky Division. No.: 17-cv-84. (Deposed 5/21/19) (Defense)

December 2017: State of New Jersey v. P.O. Joseph P. Reiman. Superior Court of N.J., Criminal Division. Criminal Complaint # 1201-W-2017-000360. (Testimony 5/22/19) (Defense)

March 2019: United States of America v. Nicholas Romantino. District Court of New Jersey, Camden Vicinage. Crim. No. 18-673 (RBK) (Testimony 6/7/19 and 9/10/19) (Defense)

SCHEDULE A

February 2018: Yvonne Mote, as Personal Representative of the Estate of Shane Watkins, deceased v. Steven Moody, et al. U.S. District Court for the Northern District of Alabama; Northwest Division. No.: 3:17-cv-00406-AKK. (Testimony 6/27/19) (Defense)

May 2018: Rashawn Quanece Middleton, as Personal Representative of the Estate of Roy Howard Middleton, SR., deceased v. Sheriff David Morgan (Escambia), et al. U.S. District Court, Northern District of Florida, Pensacola Division. No. 3:17-cv-00346-MCR-GRJ. (Deposed 7/8/19) (Defense)

May 2019: Johnny Banks v. Shelby Hawkins and City of Shannon Hills. U.S. District Court Eastern District of Arkansas. No.: 2:18-cv-00039-BSM. (Deposed 7/29/19) (Defense)

May 2018: Velvet Clowers v. Union City and John Does 1 through 4. Superior Court of Fulton County, GA. No.: 2017CV298022. (Deposed 8/14/19) (Defense)

June 2019: AJA Seats, et al. v. Village of Dolton, et al. Circuit Court of Cook County, IL. No.: 2016-L-010353. (Deposed 8/20/19) (Defense)

February 2019: Roger Dean Gillispie v. City of Miami Township, et al. U.S. District Court, Southern District of Ohio, Western Division. No. 3:13-cv-00416-TMR-MRM. (Deposed 9/4/19) (Defense)

November 2018: Tiffany Washington, et al. v. Crystal Marlowe, et al. Jefferson Circuit Court, Kentucky. No.: 10-CI-001183. (Testimony 10/1/19) (Defense)

June 2018: Celia Sanchez and Oscar Salas, Statutory Death Beneficiaries of Erik Emmanuel Salas-Sanchez v. Mando Kenneth Gomez, Alberto Rivera, Pamela Smith and the City of El Paso, TX. U.S. District Court, Western District of Texas, El Paso Division. No. 3:17-cv-00133-PR. (Deposed 9/13/19) (Defense)

April 2019: Lisa G. Finch v. City of Wichita, Kansas. U.S. District Court for the District of Kansas. No.: 18-cv-1018-JWB-KGS. (Deposed 10/2/19) (Defense)

May 2018 Trinita Farmer v. Las Vegas Metropolitan Police Department, US District Court for the District of Nevada, Case No. 2:18-cv-00860-GMN-VCF (Deposed 10/25/19) (Defense)

August 2018 Fleming v. Albuquerque, Second Judicial District Court Bernalillo County, New Mexico, Case No. D-202-CV-2014-5954 (Testimony 11/8/19) (Defense)

September 2018 Charles Mills v. William Clogston, III, Individually and in his Official Capacity as Scott County Deputy Sheriff, et al., Case No. 5:18-cv-00025-DCR (Deposed 1/22/20) (Defense)

March 2019 Joey Brockman v. City of Falmouth, Case No. 18-CI-00012 (Deposed 2/5/20) (Defense)

February 2020 Garrett Collick, et al., v. William Paterson University, et al., Case No. 2:16-cv-00471 (KM-JBC)(Deposed 2/6/20) (Defense)

June 2019 Patrick Cornely v. Camden County Corrections, Docket No. CAM-L-4671-17 (Testimony 2/25/20) (Plaintiff)

July 2019 Hurtado v. Cobb County, GA. Case No. 18-A-963-3 (Deposed 3/9/20)(Defense)

November 2019 Finley v. Loggains, City of Jonesboro. Case No. 3:18-cv-55-DPM (Deposed 4/30/20)(Defense)

January 2020 Nakiya Moran v. Calumet City, et al., Case No. 1:17-cv-02027 (Deposed 5/11/20 & 6/12/2020)(Defense)

December 2019 James Griffin v. Donald Wright, II, et al., Civil Action No. CV-2018-903480 (Deposed 5/13/20)(Defense)

April 2020 Arterburn v. Eddy's Chevrolet Cadillac, LLC, Case No. 2018 CV 000683 (Deposed 6/8/20)(Plaintiff)

December 2019 Murrietta v. City of Fresno, Case No. 1:18-at-00152 (Deposed 6/29/20)(Plaintiff)

January 2020 Lankford v. Plumerville, Case No. 4:19-cv-00619-JM (Deposed 7/14/20)(Defense)

March 2020 Ghaisar v. U.S., Case No. 1:19cv1224 (Deposed 7/29/20)(Defense)

October 2018 Rudavsky v. City of South Burlington, Case No. 2:18-cv-25 wks (Deposed 8/27/20)(Defense)

SCHEDULE A

February 2019 Herndon v. Henderson Police Department, et al., Case No. 2:19-cv-00018-GMN-NJK (Deposed 9/16/20)(Defense)
September 2020 Martin, et al. v. City of San Jose, et al., Case No. 3:19-cv-01227-EMC (Deposed 9/28/20)(Plaintiff)
March 2019 Estate of Marco Gomez v. Village of Forest Park, et al., Case No. 18 CV 910 (Deposed 11/20/20)(Defense)
January 2020 McLemore v. Columbus Consolidated Gov't, et al., Case No. 4:19-cv-00090-CDL (Deposed 12/4/2020)(Defense)
December 2020 Moore v. City and County of San Francisco, Case No. 3:18-cv-00634-SI (Deposed 12/22/20)(Plaintiff)
October 2020 Mobley v. Underwood, Case No. 0:19-cv-03223-JFA-SVH (Deposed 1/14/21)(Defense)
February 2020 Jok v. City of Burlington, Civil Action No. 2:19-CV-70 (Deposed 1/21/21)(Defense)
September 2020 Virgil v. City of Newport, Case No. 16-CV-222 (Deposed 2/24/21)(Defense)
February 2020 Mendez v City of Chicago, Case No. 1:18-cv-05560 (Deposed 3/18/21)(Plaintiff)
March 2021 Ramos - FCMS #200815-09122 (Testimony 4/8/21)(Defense)
January 2021 Ford v Glasgow, Civil Action No. 20-CI-89 (Deposed 4/9/21)(Defense)
April 2021 Anderson v Lyon County, Case No. 3:20-cv-00435-LRH-WGC (Deposed 4/20/21)(Defense)
October 2019 Lobato v LVMPD, Case No. 2:19-cv-01273-RFB-EJY (Deposed 4/27/21)(Defense)
July 2020 Andy Martin v City of San Jose, Northern District of California, Case No. 3:19-cv-01227-EMC (Testimony 5/18/21)(Plaintiff)
May 2021 Antwon Rafael Gallmon, Jr. v Forest Acres Police Department, Case No. 3:17-cv-00059-TLW-PJG (Deposed 5/26/21)(Defense)
January 2020 Meli v City of Burlington, Civil Action No. 2:19-cv-71 (Deposed 6/2/21)(Defense)
August 2020 O'Kelley v Pickens County, Civil Action No. 2:17-CV-0215-RWS (Deposed 8/10/21)(Defense)
May 2020 Crowe v Steward, Case No. 5:20-cv-00203-REW-MAS (Deposed 8/26/21)(Defense)
May 2021 Lucas v County of Fresno, Case No. 1:18-cv-01488-DAD-EPG (Deposed 10/01/21)(Plaintiff)
March 2021 Pizer v City of Rock Hill, Case No. 0:20-cv-03620-JMC-SVH (Deposed 10/27/21)(Defense)
February 2021 Estate of Napouk v LVMPD, Case No. 2:20-cv-01859-JCM-BNW (Deposed 11/3/21)(Defense)
July 2021 Estate of Soheil Antonio Mojarrad v. Willam Brett Edwards and City of Raleigh, NC, Civil Action No. 5:20-cv-397-FL (Deposed 11/8/21)(Defense)
August 2021 Latimer v William Patterson University, Docket No. PAS-L-421_20 (Deposed 11/22/21)(Defense)
November 2020 Daniel Shaham, Dec. v California Highway Patrol, 2:17-cv-01075-TLN-JDP3 (Deposed 11/23/21)(Plaintiff)
February 2020 Tate v City of Chicago, No. 18 CV 07439 (Deposed 11/29/21)(Plaintiff)
March 2019 Haines v Frank, Civil Action-Law December Term, 2017 No. 2017 (Testimony 12/1/21)(Defense)
March 2017 Pollard v Columbus Consolidated Government, et al., Civil Action File No: SC-19-CV-1150 (Deposition 12/15/21)(Defense)
December 2021 Steffel, et al. v The City of Jefferson, Missouri, et al., Case No. 20AC-CC00145 (Deposition 12/16/21)(Defense)

SCHEDULE B

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PUBLICATIONS:

- Law and Best Practices for Successful Police Operations, 12 High Risk Critical Tasks (2007, 2010, 2013, 2016, 2018 and 2021 editions)
- Legal and Liability Risk Management Manual Guide -The Law and Best Practices of Successful Jail/corrections Operations (2009 and 2016 editions)
- Recent Developments in the Use of Force, Excessive Force by Law Enforcement, Touro Law Review, Vol. 24, Number 3 (2008)
- 25th Annual Section 1983 Civil Litigation, by Practising Law Institute Video/Audio-The Unbiased Witnesses in Law Enforcement Litigation. Vol. 1, Section 8 (2008)
- Law and Best Practices for Successful Police Operations, 12 High Risk Critical Tasks That Impact Law Enforcement Operations and Create Exposure to Liability Litigation (2007)
- Legal & Liability Issues in SWAT, Emergency Response and Special Operations (2006)
- Public Safety Media Relations (Manual and Guide) (2005)
- School Legal Update (2005)
- Critical Tasks in Law Enforcement, A Legal Guide for Officers and Supervisors (2005) (Annual)
- Arrest, Search & Seizure (2005) (Annual)
- Legal & Liability Issues for Hostage Negotiators (2005)
- Use of Force (2005)
- Administrative Investigations in Law Enforcement Agencies (2004)
- Law Enforcement Legal/Liability Update (2004)
- Civil Liability and Risk Management for Law Enforcement Agencies (2003)
- Case Law on Critical Tasks in Law Enforcement (2003)
- Legal Guide to Administrative Investigations (2003)
- Policy Development for Public Safety Agencies (2002)
- Legal and Liability Issues in Public Schools (2001)
- Rhode Island Law Enforcement Officers' Guide to Criminal Procedure (2000)
- Rhode Island Law Enforcement Officers' Bill of Rights, A Guide to Investigations and Hearings (2000)

PUBLISHED ARTICLES:

- Neck Restraints, Choke Holds/Carotid Holds, What Law Enforcement Policy/Training Tells Us, The Medical/Scientific Debate, What the Cases Tell Us (2020)
- Law Enforcement Response to Unlawful Assemblies Protests and Riots (2020)
- Duty to Intervene Duty to Render Aid (2020)
- Prone/Restraint/Positional Asphyxia/Compression Asphyxia (2020)
- Law Enforcement Practices During a Pandemic (2020)
- NYMIR Law Enforcement Newsletter, a publication of the New York Municipal Insurance Reciprocal. “Understanding Exculpatory Evidence and How it May Impact Convictions – The U.S. Supreme Court Provides Further Explanation of Brady v. Maryland,” pp. 2, 6-7 (2018)

SCHEDULE B

- 2006 Legal and Liability Risk Management Manual Guide – The Law and Best Practices of Successful Jail/Corrections Operations (2009 and 2016)
- Public Risk, published by the Public Risk Management Association, January 2006, Vol. 21, No. 2, “A Continuing Story Taser™ Policies for Police Departments Continue to Evolve,” pp. 14-17 (2006)
- Public Risk, published by the Public Risk Management Association, March 2006, Vol. 21, No. 3, “Freeze” Off-Duty Firearms and Intervention: Avoiding Tragedy and Liability,” pp. 16-18 (2006)
- Public Safety Media Relations (Manual and Guide) (2005)
- Administrative Investigations in Law Enforcement Agencies (2004)
- Crime and Justice International May/June Vol. 20, No. 80, “High Speed Vehicle Pursuit,” pp. 30-34; “Developing Trends in Stop & Frisk” p. 35; “Fighting Words Directed at a Police Officer: Viability and Liability,” pp. 36-37 (2004)
- Crime and Justice International July/August Vol. 20, No. 81, “Law Enforcement Liability Issues- Agency or Individual Officer’s Response to Misconduct by Others May Create Agency or Individual Liability,” pp. 29-30 (2004)
- Public Risk, published by the Public Risk Management Association, July 2004, Vol. 19, No. 6, “Handcuffs: How to Manage the Risk,” pp. 14-17 (2004)
- The Law Enforcement Trainer published by American Society of Law Enforcement Trainers, Vol. 19, No. 3, May/June, “Training Liability in The Use of Deadly Force” pp. 24-28 (2003)

2021 Legal Updates Archive

- U.S. Supreme Court Update: Rivas-Villegas v Cortesluna, No. 20-1539 (October 2021)
- U.S. Supreme Court Update: Bond v City of Tahlequah, No. 20-1668, Per Curiam Decision (October 2021)
- U.S. Supreme Court Update: Bond v City of Tahlequah, No. 20-1668, Petition for Certiorari (September 2021)
- U.S. Supreme Court Update: Torres v Madrid, No. 19-292 (March 2021)
- U.S. Supreme Court Update: Caniglia v Storm, No. 20-157 (May 2021)

2020 Legal Updates Archive

- U.S. Supreme Court Update: Kansas v. Glover, No. 18-566 (April 2020)
- U.S. Supreme Court Update: Ybarra v. City of Chicago, No. 946 F.3d 975 (7th Circuit 2020) (May 2020)

2019 Legal Updates Archive

- U.S. Supreme Court Update: DUI Blood Draw on Unconscious Driver (July 2019)
- U.S. Supreme Court Update: The Existence of Probable Cause to Arrest May Defeat a First Amendment Claim as a Matter of Law (June 2019)

2018 Legal Updates Archive

- An Unarmed Individual Has Been Shot – Is the Officer Always Wrong? (July 2018)
- United States Supreme Court: *Sause v. Bauer*, 138 S. Ct. 2561 (July 2018)
- The United States Supreme Court Decides Privacy Issues Related to Cellular Phone Records (June 2018)
- United States Supreme Court Decides that an Arrest with Probable Cause Can Still Violate the Arrestee’s First Amendment Rights (June 2018)
- United States Supreme Court: The Automobile Exception Does Not Permit the Warrantless Entry of a Home or its Curtilage in Order to Search a Vehicle Therein (May 2018)
- United States Supreme Court: Possessor of Rental Car has Right to Privacy Even When No on Rental Agreement (May 2018)
- United States Supreme Court Grants Qualified Immunity in Case of Woman with Mental Impairment Shot by Officer (April 2018)

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- The United State Supreme Court Grants Summary Judgment and Qualified Immunity to D.C. Officers in False Arrest Case (January 2018)

2017 Legal Updates Archive

- Understanding Exculpatory Evidence and How It May Impact Convictions: The United States Supreme Court Provides Further Explanation of Brady v. Maryland (2017)
- United States Supreme Court Rejects 9th Circuit Provocation Theory in Deadly Force Confrontation (2017)
- Using Force on Persons in Medical Emergencies: United States Court of Appeals for the 6th Circuit in a Published Decision Applies New Analysis (2017)
- U.S. Supreme Court Grants Appeal in Arrest Lawsuit (2017)
- U.S. Supreme Court Clarifies "Clearly Established Law" for Qualified Immunity in Deadly Force (2017)
- U.S. Court of Appeals for Fourth Circuit Finds Police Department Social Media Policy Unconstitutional & Punishment of Two Officers Under That Policy to be Unconstitutional (2017)
- U.S. Supreme Court to Examine Provocation Theory in Law Enforcement Shootings (2017)

2016 Legal Updates Archive

- Private Health Care Contractors May Also Be Liable for a Civil Rights Violation (2016)
- Reasonableness of Entry as Force When There Is a Use of Flash Bangs As Part of Entry (2016)
- Use of Restraint Chairs (2016)
- United States Court of Appeals for the 4th Circuit Decides Limitations on TASER™ Use (2016)
- US Supreme Court Finds Child's Statements to Teachers May Sometimes be Used Against Abuser Even Though Child is Unavailable for Cross-Examination (2016)
- US Supreme Court Finds That Evidence Seized During Unconstitutional Stop May Not Be Excluded (2016)
- US Supreme Court Distinguishes Breath Test from Blood Test under Implied Consent Statutes that Criminalize a Refusal-Warrantless Blood Test Violates Fourth Amendment (2016)
- US Court of Appeals Distinguishes Use of Force (TASER™) on Persons of Diminished Capacity (2016)
- US Supreme Court Finds That Electronic Control Weapons Are Protected Under the Second Amendment's Right to Bear Arms (2016)
- Mail Policy in Jails (2016)
- Jail Staff Not Deliberately Indifferent to Pre-Trial Detainee Medical Needs (2016)
- Post-TASER™ Confession: Is a Waiver Knowing and Voluntary? (2016)
- US Court of Appeals for the 4th Circuit Decides Limitations on TASER™ Use and Announces Use of Force Analysis When Dealing with Persons of Diminished Capacity (2016)

2015 Legal Updates Archive

- US Supreme Court: Shooting at Fleeing Vehicles (2015)
- US Supreme Court: Use of Force on Pretrial Detainees Judged by Objective Reasonableness Standard (2015)
- US Supreme Court: No Answer to Whether ADA Applies When Officers are Dealing with a Mentally Impaired, Violent and Armed Subject (2015)
- US Supreme Court: Absent Reasonable Suspicion Police Extension of a Traffic Stop in Order to Conduct a Dog Sniff Violates the Constitution's Shield Against Unreasonable Seizures (2015)

2014 Legal Updates Archive

- US Supreme Court: Are Knock and Talks Restricted to the Front Door of a Residence? (2014)
- US Supreme Court: Officers Must Act Reasonably Not Perfectly (2014)
- US Supreme Court: Cellular Device Search Incident to Arrest (2014)
- US Supreme Court: Shooting at Vehicle & 4th Amendment (2014)
- US Supreme Court: Summary Judgment in Use of Force Cases (2014)

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- US Supreme Court: When Does an Anonymous Report Amount to Reasonable Suspicion? (2014)
- US Supreme Court Clarifies Consent and Co-Occupants (2014)

2013 Legal Updates Archive

- US Supreme Court: Can Officer Pursue Fleeing Misdemeanor Suspect into Home or Residential Curtilage (2013)
- US Supreme Court: Pre-Custody and Un-Mirandized Silence to Questions by Law Enforcement May Be Commented on by the Prosecutor at Trial (2013)
- Forced Blood Draw for DUI (2013)
- US Supreme Court: Narcotics Sniffing Dog & 4th Amendment Search (2013)
- US Supreme Court: K-9 Alert Establishes Probable Cause to Search Vehicle (2013)

2012 Legal Updates Archive

- US Supreme Court: Exigent Entry Based on Belief of Imminent Violence (2012)
- US Supreme Court: Intentional Violation of Miranda Rule and the Impact on Subsequent Warned Confession (2012)
- Taser™ Used to Subdue Non-Compliant 73-Year-Old (2012)
- US Supreme Court: Visual Strip Searches at Jail Intake of Persons Being Placed in General Population Need Not Be Supported by Reasonable Suspicion (2012)
- Facebook© and the First Amendment Rights of Police Officers (2012)
- US Supreme Court: A Convicted Prisoner May Not be in Custody for Miranda Purposes (2012)
- US Supreme Court: A Determination of Probable Cause by a Magistrate Will Generally Protect Officers/Investigators from Liability (2012)
- Fourth Amendment Protection Applies to Placing GPS on Vehicle (2012)
- How Eyewitness Identification Will Be Reviewed When There is No Improper Conduct by Law Enforcement (2012)

2011 Legal Updates Archive

- Federal Liability for Pursuit (2011)
- Court Applies Graham in Deciding that Use of the TASER® was Unconstitutional (2011)
- Officers Being Recorded by Citizens While Working (2011)
- TASER® Probe Mode, Secondary Impact and Liability (2011)
- US Supreme Court: Prosecution Must Present Actual Forensic Analyst in Court (2011)
- US Supreme Court Clarifies Miranda Warnings and Juveniles (2011)
- US Supreme Court: Exclusionary Rule (2011)
- Fleeing from Law Enforcement in a Vehicle is a Violent Crime (2011)
- Indiana Supreme Court: A Person Cannot Resist Officer (2011)
- U.S. Supreme Court Clarifies Destruction of Evidence Exigency (2011)
- Picketing Funerals and the First Amendment (2011)
- Statements Taken During On-Going Emergency are Admissible at Trial (2011)

2010 Legal Updates Archive

- Use of Taser™ in Drive-Stun Mode on Protestors: Objectively Reasonable in 2nd Circuit (2010)
- 9th Circuit TASER® Case Re-visited (2010)
- Use of Force: Pre-Shooting Conduct and Suicide by Cop Cases (2010)
- US Supreme Ct: Search of Officer's Text Messages from Department Issued Pager Was Reasonable (2010) (Co-Authored with Lou Reiter)

2009 Legal Updates Archive

- US Court of Appeals for the Ninth Circuit Restricts the Use of TASER™ (2009)
- Michigan v Fisher: U.S. Supreme Court Clarifies Exigent Home Entries (2009)
- TASER™, the Target Zone, Policy & Training (2009)
- TASER™ International, Inc. Warns Against Targeting the Chest with Electronic Control Devices (2009)

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- Taser® On Non-Compliant Arrestee (2009)
- Exam Violated Rights of White and Hispanic Firefighters (2009)
- Three 2009 U.S. Supreme Court Cases Impacting Law Enforcement (2009)
- Ashcroft v. Iqbal and Law Enforcement Supervisory Liability (2009)
- AZ v. Gant: Inventory Searches of Motor Vehicles (2009)
- AZ v. Gant: Commentary & Misinterpretations (2009)
- AZ v. Gant: Final Case Judgment & What It Means to Law Enforcement (2009)
- An Unreasonable Delay in Bringing a Suspect to Court May Render the Suspect's Confession Inadmissible (2009)
- US Supreme Court Changes Qualified Immunity Rules for Civil Rights Lawsuits Against Law Enforcement (2009)
- U.S. Supreme Court Further Diminishes Reach of Exclusionary Rule (2009)

2008 Legal Updates Archive

- Summary of Arguments: U.S. v. Herring, AZ v. Gant (2008)
- Preview of 2008-2009 U.S. Supreme Court Cases Impacting Law Enforcement (2008)
- Hostages & The Legal Duty to Protect (2008)
- Negotiator Liability (2008)
- Hostages & the Legal Duty to Protect (2008)
- An Investigator's Road Map to Out of Court Statements (2008)
- Managing Law Enforcement Liability Risk (2008)
- Handcuffing as Excessive Force (2008)
- Vehicle Checkpoints (2008)
- Supreme Court Decides Incident to Arrest –Vehicle Case (2008)
- Covert Video Surveillance (2008)
- Compelled Substance Abuse Testing (2008)
- Liability Exposure in Special Operations (2008)
- Sexual Misconduct, Sexual Harassment and Sexual Discrimination Series with Lou Reiter: Part 1: Introduction to Sexual Misconduct & Agency Liability (2008)
- Sexual Misconduct, Sexual Harassment and Sexual Discrimination Series with Lou Reiter: Part 2: Policy v. Custom / Operational Policy & Failure to Have a Policy (2008)
- Sexual Misconduct, Sexual Harassment and Sexual Discrimination Series with Lou Reiter: Part 3: Failure to Train & Failure to Supervise (2008)
- Sexual Misconduct, Sexual Harassment and Sexual Discrimination Series with Lou Reiter: Part 4: The Need for Policy and Training, and Avoiding Deliberate Indifference (2008)

2007 Legal Updates Archive

- Garrity Issues in Law Enforcement Series: Part 1: Garrity and the Administrative Interview (2007)
- Garrity Issues in Law Enforcement Series: Part 2: Immunity Granted Under Garrity (2007)
- Garrity Issues in Law Enforcement Series: Part 3: Compulsion as the Triggering Mechanism (2007)
- Garrity Issues in Law Enforcement Series: Part 4: Civilian Review Boards and Garrity (2007)
- Garrity Issues in Law Enforcement Series: Part 5: Are Off-Duty Incidents within the Scope of Garrity? (2007)
- Garrity Issues in Law Enforcement Series: Part 6: Once Immunized, Officer Must Tell the Truth (2007)
- What Happens When the Plaintiff Cannot Identify Which Officer Beat Him? (2007)
- Training Liability in Use of Deadly Force (2007)
- Supreme Court to Hear Incident to Arrest –Vehicle Case (2007)
- Cellular Phones/Digital Devices and Search Incident to Arrest (2007)
- Vehicle Stops: Does a Motorist Have a Privacy Interest in Their License Plate? (2007)
- Model Policy: Off-Duty Action (2007)
- U.S. Supreme Court Decides Passenger Privacy Case (2007)

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- No Liability in Search Warrant Execution (2007)
- Persons with Disabilities (2007)
- Off-Duty Murder Not Under “Color of Law” Thus, No Agency Liability (2007)
- Georgia v. Randolph: Police Cannot Use the Consent of a Co-Occupant to Make Entry in Order to Search for Evidence to be used Against the Opposing Occupant Who Is Present and Objects to the Entry (2007)
- U.S. Supreme Court Decides on Scott v. Harris - Vehicle Pursuit Implications (2007)
- U.S. Supreme Court to Decide Privacy Interests of Passenger (2007)
- Court Dismisses Lawsuit Based Upon Death of Emotionally Disturbed Person (2007)
- Anticipatory Search Warrant: United States v. Grubbs (2007)
- Anonymous Calls and Reasonable Suspicion Standard (2007)
- Scott v. Harris: Summary of Oral Arguments (2007)
- Municipal Insurance Pool Not Liable: Robbery and Murder by Police Trainee (2007)
- Cocaine Discovered in Auto Leads to Probable Cause to Arrest All Occupants (2007)
- LEO’s Duty to Protect Persons from 3rd Party Harm (2007)
- Ramming During Pursuit Viewed as Deadly Force (2007)
- Companion with Gun May Provide Reasonable Suspicion for Pat-Down (2007)

2006 Legal Updates Archive

- Duty of Officer’s to Intervene when Observing an Excessive Use of Force (2006)
- The Law of Citizen Contacts and Stop and Frisk (2006)
- Positional Asphyxia (2006)
- Seizure at Gunpoint (2006)
- Pepper Spray (2006)
- Beanbag Rounds (2006)
- U.S. Supreme Court Upholds Canine Sniffs of Vehicles (2006)
- Liability Based on Agency or Individual Failure to Intervene (2006)
- Legal/Liability Issues in the Training Function (2006)
- Overview of Police Liability (2006)
- Deadly Force to Prevent the Escape of a Violent Felon (2006)
- Bite and Hold Canines: Warning Required Before Release (2006)
- Reasonableness of Handcuffing during a valid “Terry Stop” (2006)
- Focus on Liability Reduction and Better Performance (2006)
- Dealing with the Mentally Ill and Emotionally Disturbed in the Use of Force (2006)
- Use of Deadly Force: Pre-Shooting Conduct and the 21 Foot Rule (2006)
- Consent Searches of Motor Vehicles (2006)

Other Articles

- US Supreme Court Places New Restrictions on Search Incident to arrest in Vehicles (2009)
- "Use of Force-Policy and Training Considerations" (2004)

From the LLRMI Jail/Corrections Article Archive

- 8th Cir: A Foreseeable Suicide May Create Liability (2010)
- The United States Court of Appeals for the Ninth Circuit Upholds the Blanket Strip Search Policy of San Francisco County (2010)
- Strip Searches for Institutional Security in a Jail or Lock-up Setting (2009)
- 1st Cir: Strip Search in Jails / Detention Centers (2009)
- 2nd Cir: Strip Search in Jails / Detention Centers (2009)
- 3rd Cir: Strip Search in Jails / Detention Centers (2009)
- 4th Cir: Strip Search in Jails / Detention Centers (2009)
- 5th Cir: Strip Search in Jails / Detention Centers (2009)
- 6th Cir: Strip Search in Jails / Detention Centers (2009)

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- 7th Cir: Strip Search in Jails / Detention Centers (2009)
- 8th Cir: Strip Search in Jails / Detention Centers (2009)
- 9th Cir: Strip Search in Jails / Detention Centers (2009)
- 10th Cir: Strip Search in Jails / Detention Centers (2009)
- 11th Cir: Strip Search in Jails / Detention Centers (2009)
- 9th Cir: Dental Care in Jails / Detention Centers (2009)
- 9th Cir: Jail (Officer) Failure to Follow Doctor's Orders (2009)
- 9th Cir: Strip Search and Self Surrender (2009)
- Classification of Arrestees Upon Entry into a Jail (2009)
- Duty to Protect Prisoners from Assault (2009)
- Handling Grievances in a Jail / Detention Setting (2009)
- Identity Verification (2009)
- Failure to Provide Medication in Jail / Detention Setting (2009)
- Inmate Mail – PLRA and Allegations of Rights Violations (2009)
- 9th Cir References 8th Amendment and Nutrition Requirements for Inmates (2009)
- Inmates and Freedom of Religion (2009)
- Strip Search Substitute / Subterfuge (2009)
- Use of Force in Jails / Detention Centers (2009)

From the LLRMI Law Enforcement Model Policy Electronic Control Devices website

- Model Policy - Electronic Control Devices (multiple years)
- In-Custody Deaths and Excited Delirium (2007)

From LLRMI Legal Questions Answered website

- Can Pointing a gun be considered a use of force? (2010)
- Off-Duty Carry by Reserve Officers (2009)
- Agency and Personal liability in failure to provide shooting training (2009)
- Involuntary Transport to Station for Identification (2008)
- Questioning a passenger during a traffic stop (2008)
- Bingo Hunting and Privacy Interests in License Plate (2008)
- Using Dog Sniff's for Probable Cause to Obtain Search Warrant (2008)
- Garrity application with EMS (2008)
- Truant Officer Questioning Student - at request of Superintendent (2007)
- Dorm Room Searches. Response at school-training.com (2007)
- "Fruits of the Poisonous Tree" - A Miranda Example (2007)
- Releasing Mug Shots to the Media (2007)
- Joint Liability in Multi-Agency Operations (2007)
- Miranda after confession given during non-custody interview (2007)
- No-Knock clause in search warrants (2007)
- Court requirements for police training on EDP's (2007)
- Responding to an Open House Party (2007)
- Officer with search warrant gets door shut in face... OK to enter? (2007)
- Miranda and Detention during Search Warrant Execution (2007)
- Creating a Use of Force Report (2007)
- Failure to Protect (2007)
- Interviewing/Interrogating Students on Campus (2007)
- Probable Cause, and taking a person to police stations (2007)
- Vehicle Search Consent (2007)
- Need for search warrant for vehicle towed to private lot (2007)
- Reasonable expectation of privacy in information supplied to a third party (2007)
- First Appearance Hearings & the 48/72 Hour Window - City & Officer Liability (2007)
- Citizen Complaint Recordings (2007)
- Hiring and the Probationary Period (2007)

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- Permission to search during stop & Robinette decision (2007)

*** Note: articles published electronically on a weekly basis and archived- available at www.patc.com and www.llrmi.com

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CONFERENCE PRESENTATIONS/TRAINING SESSIONS:

- 2021 LLRMI National Internal Affairs Training & Certification. Las Vegas, NV. “Investigating Citizen Complaints for Field Supervisors” December
- 2021 LLRMI 5 Day Mastering Performance Supervision, Leadership and Management. Las Vegas, NV. “What Police Reform and Accountability Means to Supervisors” December
- 2021 CRL Conference “Staying Ahead of the Losses: Policies, Training and Supervision that Stays Ahead of the Risks” November
- 2021 CRL Conference “The Changing Environment of Law Enforcement and How It Impacts Coverage, Claims and Risk Control” November
- 2021 PLI Conference, Section 1983 Civil Rights Litigation Program, New York City “Use of Force Training and Policy in the Reform Movement” October
- 2021 Alabama Municipal Attorney Association, Gulf Shores, Alabama, “Use of Force Training and Policy in the Reform Movement” October
- 2021 Law Enforcement Liability Risk Management Conference, Franklin, Tennessee, “Staying Ahead of Liability: Policing in the Reform Movement” October
- 2021 Platte County Sheriff’s Office. Kansas City, MO. “Emerging Law Enforcement Legal Trends: Policing in the Reform Movement” October
- 2021 Local Government Insurance Trust, Maryland, “The Law and Best Practices of Successful Police Operations” September
- 2021 Illinois Mobile Team Unit 9, “Implicit Bias – De-Escalation – Procedural Justice: A Call for Change in Law Enforcement Training and Operations” June
- 2021 Illinois Mobile Team Unit 9, “Policing Demonstrations, Protest and Civil Unrest” June
- 2021 Arkansas City Attorney’s Association Virtual CLE: - “Analyzing the Derek Chauvin Trail” June
- 2021 Legal and Liability Risk Management Institute Online Virtual Training – “Policing in Police Reform Times” January June
- 2021 Kentucky Jailers Association. Bowling Green, KY. “Legal Update for Law Enforcement and Jails” June

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- 2021 CRL Conference “De-Escalation: Training, Policy and How De-Escalation is Impacting Use of Force” May
- 2021 LLRMI Tactical, SWAT & Emergency Response Operations Seminar. St. Louis, MO. “Emerging Legal Trends & Liability Management for Tactical, SWAT & Emergency Response Operations” May
- 2021 LLRMI National Internal Affairs Training and Certification Conference. Smyrna, TN. “Garrity in Today’s Changing Environment” April
- 2021 LLRMI Jail/Correction Risk Management, Liability and Loss Control Conference. Smyrna, TN. “Emerging Legal Trends for Jails and Correction” April
- 2021 LLRMI Tactical, SWAT & Emergency Response Operations Conference. Smyrna, TN. “Emerging Legal Trends and Liability Management for Tactical, SWAT and Emergency Response Operations” April
- 2021 West Michigan Tactical Officers Association “SWAT Liability” March
- 2021 CRL Conference “Current State of Law Enforcement Reform Post- George Floyd” March
- 2021 Southern Illinois Criminal Justice Training Program. Effingham, IL. “Implicit Bias” March
- 2021 Central Illinois Police Training Center. Peoria, IL. “Implicit Bias” March
- 2021 Southwestern Illinois Law Enforcement Commission. Belleville, IL. “Policing Demonstrations, Protest and Civil Unrest” March
- 2021 Kentucky Sheriff’s Association Annual Conference. Bowling Green, KY. “Emerging Legal Trends and Best Law Enforcement Practices” February
- 2021 Legal and Liability Risk Management Institute Online Virtual Training – “Procedural Justice and Legitimacy of Authority” January
- 2021 Legal and Liability Risk Management Institute Online Virtual Training – “Managing Demonstrations, Protests, Civil Disobedience, Legal and Liability Issues” January (1.5 hours)
- 2020 Legal and Liability Risk Management Institute Online Virtual Training – “De-Escalation – Reducing Intensity” December (1.5 hours)
- 2020 Georgia Sheriffs’ Association Emerging Legal and Liability Trends “What Every Sheriff Needs to Know” December
- 2020 Tennessee Trainers Association Conference, “Current Issues Impacting Law Enforcement” November
- 2020 Madison Police Department Legal Update Training November
- 2020 CRL Risk Control Conference “Political Unrest, Cultural Movement” October
- 2020 Practising Law Institute- “Use of Force” (October)
- 2020 SWAT Training, Providence Police Department September

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- 2020 CRL Conference “Police Reform, Implicit Bias, Procedural Justice, De-Escalation and Legislative Action on Police Reform” September
- 2020 VRSA Duty to Intervene in Unreasonable Force/Duty to Render Aid During a Use of Force Event Webinar August (1 hour)
- 2020 IMPG Online Presentation- “How Current Events are Impacting and Shaping Law Enforcement” August (1 hour)
- 2020 Legal and Liability Risk Management Institute Online Webinar Training- “How Current Events are Impacting and Shaping Law Enforcement” August (2 hours)
- 2020 Legal and Liability Risk Management Institute Online Webinar Training- “Law Enforcement Personnel and Implicit Bias During Interactions with Citizens and Suspects” July (1.5 hours)
- 2020 VRSA Carotid Restraint Webinar July (1.5 hours)
- 2020 TML: How Current Events Are Affecting Police Tactics and Policies Webinar July (1.5 hours)
- 2020 VRSA Arrestee Restraint Webinar July (1.5 hours)
- 2020 Nampa, Idaho. “Emerging Legal Trends & Liability Management for Tactical, SWAT & Emergency Response Operations” June
- 2020 Policing Demonstrations, Protest and Civil Unrest Webinar Training June (2 hours)
- 2020 TML: Crowd Control Webinar June (1 hour)
- 2020 SWAT Training, Providence Police Department June (2 hours)
- 2020 CLM, A Member of the Institutes Online Webinar Training- “Covid-19 & Correctional Facilities: Mitigating both Transmission and Liability” April (1 hour)
- 2020 Legal and Liability Risk Management Institute Online Webinar Training- “Covid-19 Law Enforcement Operations in the Midst of a Pandemic” April (1 hour)
- 2020 Legal and Liability Risk Management Institute Online Webinar Training- “Use of Force: Moving Forward” April (1 hour)
- 2020 Lexington, South Carolina. “SWAT & Emergency Response Operations” March
- 2020 Smithfield, Rhode Island. “Arrest, Search and Seizure” February
- 2020 Danville, Virginia. “Arrest, Search and Seizure” February
- 2020 Champaign, Illinois. “Emerging Legal Trends & Liability Management for Tactical, SWAT & Emergency Response Operations” February
- 2020 Champaign, Illinois. “ILEAS Policing Demonstrations, Protest and Civil Unrest” February
- 2020 San Diego, California. Civil Rights & Governmental Tort Liability Seminar. “Litigation Skills Workshop” January

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- 2019 Dawsonville, Georgia. "Emerging Legal Trend & Liability Management for Tactical, SWAT & Emergency Response Operations" December
- 2019 Charlotte, North Carolina. County Reinsurance Annual Conference. "Emerging Issues Related to Law Enforcement Liability and Risk Management" November
- 2019 Sandy, Utah. LLRMI Tactical, SWAT & Emergency Response Operations Seminar. November
- 2019 Las Vegas, Nevada. "Supervision Leadership" October
- 2019 Las Vegas, Nevada. "Lost Control Risk Management" October
- 2019 Las Vegas, Nevada. "Advanced Internal Affairs" October
- 2019 Lafayette County Sheriff's Office, Missouri. "Emerging Legal Trends for Law Enforcement" & "Legal Update for Law Enforcement and Jails" October
- 2019 County Risk Sharing Authority, Ohio. "Legal Update: Emerging Trends in Law Enforcement" October
- 2019 Arkansas Association of Chiefs of Police Conference, Rogers, AR. "Emerging Legal Trends and Best Law Enforcement Practices" September
- 2019 Kentucky Sheriff's Association Annual Conference. Bowling Green, KY. "Emerging Legal Trends and Best Law Enforcement Practices" September
- 2019 Texas Association of Counties, multiple locations "Emerging Legal Trends and Liability Management for Tactical, SWAT and Emergency Response Operations" August
- 2019 Kentucky Association Chiefs of Police Annual Conference. Owensboro, KY. "Law and Best Practices Update" July
- 2019 LLRMI Tactical, SWAT & Emergency Response Operations Seminar. Franklin, TN. "Emerging Legal Trends and Liability Management for Tactical, SWAT and Emergency Response Operations" July
- 2019 SPIAA Training Conference, Kansas City, MO. "Law and Best Practices Update and the Impact of Liability on Officer Wellness." July
- 2019 LLRMI Liability Management for Tactical, SWAT & Emergency Response Operations Training Seminar. Fort Worth, TX. "SWAT Legal and Best Practices" July
- 2019 Rhode Island Bar Association Annual Meeting "Section 1983 Litigation" June
- 2019 Local Government Insurance Trust, Maryland. "Emerging Legal Trends and Best Law Enforcement Practices" June
- 2019 Michigan Municipal Risk Management Authority. Livonia, MI. "Emerging Legal Trends and Liability Management for Tactical, SWAT and Emergency Response Operations" May
- 2019 Tennessee Trainers Association Conference, Franklin, TN. "Emerging Legal Trends and Best Law Enforcement Practices" May

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- 2019 LLRMI Risk Management and Loss Control for Law Enforcement Conference, Cape Coral, FL “Law Enforcement Litigation and Legal Trends” May
- 2019 LLRMI Tactical, SWAT & Emergency Response Operations Seminar. Cape Coral, FL. “Emerging Legal Trends and Liability Management for Tactical, SWAT and Emergency Response Operations” May
- 2019 Missouri Public Risk “Law and Best Practices for Patrol” and “Law and Best Practices for Investigative Operations” April
- 2019 Georgia Sheriff’s Association “Mastering Supervisor and Liability Management” April
- 2019 New Jersey Police Chiefs Association “Legal Update and Contemporary Best Practices in Law Enforcement” April
- 2019 IMLA Mid-Year Seminar, Washington D.C. “Section 1983: Trending Issues and Hot Topics” March
- 2019 University of Georgia, Athens, GA “Law and Best Practices Update” March
- 2019 LLRMI Jail/Correction Risk Management, Liability and Loss Control Conference. Las Vegas, NV. “Emerging Legal Trends for Jails and Correction” February
- 2019 LLRMI Tactical, SWAT & Emergency Response Operations Seminar. Las Vegas, NV. “Emerging Legal Trends and Liability Management for Tactical, SWAT and Emergency Response Operations” February
- 2019 IMLA Online Webinar “Use of Body Worn Camera Video at Trial” February
- 2018 LLRMI Liability Management for Tactical, SWAT & Emergency Response Operations Training Seminar. Grand Prairie, TX. “SWAT Legal and Best Practices” December
- 2018 KLC Instructor Simulator Conference “All Use of Force Training and Use of Force Shoot, Don’t Shoot Decision Making” November
- 2018 Missouri Public Risk “Emerging Legal Trends and Best Law Enforcement Practices” November
- 2018 TN PRIMA “Legal Update” November
- 2018 Cookeville Police Department, TN “Supervisor Liability” November
- 2018 Virginia “The Law and Best Practices of SWAT Operations and Tactical Command” October
- 2018 Georgia Local Government Risk Management Services – Georgia Law Enforcement Training “Law and Best Practices of the High-Risk Critical Tasks in Law Enforcement Including Use of Force, Deadly Force, Dealing with Person of Diminished Capacity, Pursuits, and Special Operations” October
- 2018 Texas Commission on Law Enforcement Annual Conference “Emerging Legal Trends – Impact on Police Operations” October
- 2018 Midwest Public Risk Fall Conference, MO. “Emerging Legal Trends – Impact on Law Enforcement” October

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- 2018 Kentucky Association of Counties “Emerging Legal Trends for Attorneys” October
- 2018 Manassas Park Police Department, VA. “Emerging Legal Trends in Law Enforcement” October
- 2018 Arkansas Association of Chiefs of Police- “Emerging Legal Trends in Law Enforcement” September
- 2018 International Municipal Lawyers Association Webinar Training- “Officer Involved Shootings” August
- 2018 Twin River Management Group, Lincoln, RI. Casino Security Staff Training- “Active Shooter and Other Critical Incidents, Use of Force, Self-Defense, Citizen’s Arrest, and Law and Best Practices.” July
- 2018 LLRMI Emerging Legal Trends and Liability Management for Tactical, SWAT & Emergency Response Operations Training Seminar, Georgetown, TX. “SWAT Legal and Best Practices” July
- 2018 Michigan Association of Chiefs of Police- “Emerging Legal Trends in Law Enforcement” June
- 2018 RI Bar Association Annual Meeting “Officer Involved Shootings and Pursuits: Law, Litigation and Best Practices” June
- 2018 VML Insurance Programs, Virginia “Policing Demonstrations, Protest, and Civil Unrest” Legal, Liability Issues, First and Fourth Amendment Protections. May
- 2018 FBINAA Louisiana Chapter, “Legal Update: Emerging Trends in Law Enforcement”. April
- 2018 South Dakota Police Chief’s Association Joint Training Conference, Deadwood, SD. “Legal Update: Case Law Impacting Law Enforcement and Jail Operations”. April
- 2018 LLRMI Risk Management and Loss Control for Law Enforcement Conference, Cape Coral, FL “Emerging Legal Updates Impacting Liability, Lawsuits, Policies and Procedures”. April
- 2018 MCLE New England, Boston, MA. “Police Misconduct Litigation” March
- 2018 VML Insurance Programs, Virginia “Policing Demonstrations, Protest, and Civil Unrest” Legal, Liability Issues, First and Fourth Amendment Protections. March
- 2018 Hanover County Sheriff’s Office, Hanover, VA “Legal Update: Emerging Trends in Law Enforcement” March
- 2018 Palm Beach Police Department, Palm Beach FL “Policing Demonstrations, Protest, and Civil Unrest” Legal, Liability Issues, First and Fourth Amendment Protections. March
- 2018 Alabama Association of Chiefs of Police Conference, Montgomery, AL “Legal Update: Emerging Trends in Law Enforcement” February
- 2018 VML Insurance Programs, Virginia “Policing Demonstrations, Protest, and Civil Unrest” Legal, Liability Issues, First and Fourth Amendment Protections. February

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- 2018 “Law of Use of Force” University of Arkansas School of Law, Fayetteville, AR. February
- 2018 “Law Enforcement in the Current Environment of Protests, Video, and Lawsuits” Salve Regina University, Newport, RI. February
- 2018 Alabama Sheriffs Association “Emerging Legal Trends and Best Law Enforcement Practices” Montgomery, AL, January (8 hours)
- 2018 Legal and Liability Risk Management Institute Online Webinar Training- “Demonstrations, Mass Protests, and the Occupy Movement” January (1 hour)
- 2017 Legal and Liability Risk Management Institute Online Webinar Training- “Use of Force: Moving Forward” December (1 hour)
- 2017 Tennessee Association of Chiefs of Police- “Protest and Demonstrations: The Interplay Between First and Fourth Amendment Rights” December (6 hours)
- 2017 County Reassurance Conference- “Emerging Trends and Law Enforcement Liability” Phoenix, AZ, November (2 hours)
- 2017 International Municipal Lawyers Association- “Law and Best Practices in the Use and Implementation of Body Worn Cameras” October, Niagara Falls, NY (2 hours)
- 2017 Legal and Liability Risk Management Institute Jail/Correction Risk Management, Liability and Loss Control Conference- “Emerging Litigation and Legal Trends” October, Cape Coral, FL (5 hours)
- 2017 Vermont League of Cities Annual Conference- “Emerging Legal Trends” October (2 hours)
- 2017 Virginia Association of Chiefs of Police- “Emerging Trends in Law Enforcement”
- 2017 Kentucky Sheriffs Conference- “Emerging Trends in Law Enforcement”
- 2017 Kentucky Council on Crime & Delinquency- “Emerging Trends in Jails and Corrections”
- 2017 Twin River Management Group, R.I. – Security staff training. June (8 hours)
- 2016 Defense Research Institute, Austin, Texas
- 2015 International Municipal Lawyer’s Association. Officer Involved in Shootings and Qualified Immunity Post Plumhoff
- 2015 IADLEST, International Association of Director of Law Enforcement Standards and Training. “Training Liability” and “Emergency Liability Trends”
- 2015 Georgia Jail Association’s Annual Conference -High Risk Critical Task in the Jail Operation, Savannah Georgia
- 2015 Arkansas Association of Chiefs of Police Annual Meeting -Law and Best Practices for Policing in Trying Times.
- 2015 South Carolina Municipal Association’s Annual Meeting for Elected Officials – Law Enforcement for Trying Times

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2015	Texas Commission on Law Enforcement, training for 750 Law Enforcement trainers
2015	National Internal Affairs Investigators' Annual Conference – Law Enforcement Liability and the Interplay on the Internal Affairs
2013	Suffolk University Law School, “Policy in Trying Times” Boston Massachusetts
2013	Police K-9 Magazine, National Handler Instructor Training Seminar and Annual Conference for K-9
2013	Practising Law Institute- Annual Conference Section 1983 Civil Rights Litigation Program
2012	Developed a Training Program for Law Enforcement and attorneys dealing with Use of Force; Electronic Control Devices; and Sudden Custody Death.
2012	National Internal Affairs Investigation Association Annual Conference- Use of Force and Sudden in Custody Death
2012	Sheriff's Association New Sheriff's Conference Legal Update and Best Practices for Sheriffs
2012	Texas Commission Law Enforcement Officer on Standards and Education annual conference for Texas Trainers/ “Legal Issues for Law Enforcement Trainers”
2012	Practising Law Institute- “Mass Protest” 29 th Annual Conference Section 1983 Civil Rights Litigation Program
2010	PRIMA, Law Enforcement Risk Management Program
2010	National Internal Affairs Investigators Association Annual Conference, Indianapolis, Indiana
2010	Annual Conference of the National Council of County Association Executives
2009	Utah Highway Patrol – Law Enforcement Pursuit Operations
2009	Practising Law Institute- Annual Conference Section 1983 Civil Rights Litigation Program
2009	National Conference for Public Risk Managers.
2009	Continued training programs for Public Agency Training Council throughout the United States to include, Policy Development and Implementation, Arrest Search & Seizure, Use of Force, Civil Liability Issues, Liability Issues for Narcotics Officers, Legal Issues for Tactical Operations, Liability Issues in Public Schools and Internal Affairs
2009	Georgetown Law Center/Civil Rights Litigation, Session 1 “Strip Searches in Jails,” Session 2 “Tasers”
2008	Practising Law Institute- Annual Conference Section 1983 Civil Rights Litigation Program

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- 2008 Texas Commission on Law Enforcement Standards and Education “Liability Management for Law Enforcement Trainers
- 2008 Association of American Law Schools Annual Conference- “Law Enforcement Policy and Training/Use of Force & Pursuit in the Aftermath of Scott v. Harris”
- 2007 Continued training programs for Public Agency Training Council throughout the United States to include, Policy Development and Implementation, Arrest Search & Seizure, Use of Force, Civil Liability Issues, Liability Issues for Narcotics Officers, Legal Issues for Tactical Operations, Liability Issues in Public Schools and Internal Affairs
- 2007 Georgetown Law Center/Civil Rights Litigation: Session 1 “Law Enforcement Policy and Training in Use of Force”; Session 2: “Law Enforcement- the ADA and Persons of Diminished Capacity.”
- 2007 South Dakota Annual Conference for Chiefs and Sheriffs- “Legal Update on High Liability Issues in Law Enforcement”
- 2007 Pennsylvania Chiefs of Police- “Legal Update on High Liability Issues in Law Enforcement”
- 2007 International Municipal Lawyer’s Association Annual Conference- “Garrity and the Administrative Interview”
- 2007 Practising Law Institute- “Use of Force” 24th Annual Conference Section 1983 Civil Rights Litigation Program
- 2007 25th Annual Section 1983 Civil Litigation, by Practising Law Institute Video/Audio-The Unbiased Witnesses in Law Enforcement Litigation. Vol. 1, Section 8
- 2006 Continued training programs for Public Agency Training Council throughout the United States to include, Policy Development and Implementation, Arrest Search & Seizure, Use of Force, Civil Liability Issues, Liability Issues for Narcotics Officers, Legal Issues for Tactical Operations, Liability Issues in Public Schools and Internal Affairs
- 2006 Georgetown Law Center/Civil Rights Litigation “Police Misconduct” §1983
- 2006 National Internal Affairs Investigators Association Annual Conference, Gatlinburg Tennessee “Use of Force and the Internal Affairs Process”
- 2006 Georgia Bar Association “ICLE”, Atlanta Georgia “Evaluating Police Liability Claims”
- 2005 Legal and Policy Issues in the Use of Force- throughout United States
- 2005 Georgetown Law Center/ Civil Rights Litigation “Less-Lethal Force”
- 2005 Arrest, Search & Seizure, and Questioning-throughout United States
- 2005 Civil Liability and Risk Management in Law Enforcement-throughout United States
- 2005 Internal Affairs/Administrative Investigations- throughout United States
- 2005 PRIMA National Conference-Milwaukee “Use of Force” and “Critical Tasks in Law Enforcement”

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- 2005 National Sheriff's Association Annual Conference-Louisville "Legal Issues in Administrative Investigations"
- 2005 National Leagues of Cities and Towns (Risk Consortium)-Seattle "Identifying Contemporary Risks in Law Enforcement Liability"
- 2004 Legal and Liability Issues in Public Schools, throughout United States
- 2004 Policy Development for Law Enforcement Agencies, throughout United States
- 2004 Civil Liability and Risk Management for Law Enforcement Agencies, throughout United States
- 2004 Legal Issues in Narcotics Operations, throughout United States
- 2004 Critical Legal Tasks for Patrol Officers, Illinois Mobile Training Unit
- 2004 Georgetown Law Center/Civil Rights Litigation-§ 1983
- 2004 Rhode Island Bar Association Annual Conference- "Stop in the Name of the Law"
- 2004 Oklahoma Attorney General's Annual Conference "Policy Summit" Policy session for Police Executives
- 2004 Texas Commission Law Enforcement Officer on Standards and Education annual conference for Texas Trainers/ "Legal Issues for Law Enforcement Trainers"
- 2003 Legal and Liability Issues in Public Schools, throughout United States
- 2003 Policy Development for Law Enforcement Agencies, throughout United States
- 2003 Civil Liability and Risk Management for Law Enforcement Agencies, throughout United States
- 2003 Advanced Internal Affairs, Myrtle Beach, SC, Las Vegas, NV.
- 2003 Georgetown Law Center/Civil Rights Litigation-§1983
- 2003 Georgia Internal Affairs Investigators Annual Conference
- 2003 Tennessee Chiefs' Association Conference Training
- 2003 Alaska Chiefs' Association/FBINAA Executive Development Conference
- 2003 Office of Corporation Counsel/Metropolitan Police, Washington D.C.
- 2003 International Law Enforcement Educators and Trainers Association Annual Conference/Chicago "Trainers and Use of Force Liability"
- 2002 Legal and Liability Issues in Public Schools, throughout the United States
- 2002 Policy Development for Public Safety Agencies, throughout the United States
- 2002 International Association of Law Enforcement Planners National Conference, Long Beach, California

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- 2002 National Internal Affairs Investigators Association National Conference, Tampa, Florida
- 2001 Legal Issues in Use of Force Seminar, Salve Regina University
- 2001 Advanced Internal Affairs Seminar, Las Vegas
- 2000 Police Misconduct/Racial Profiling, Georgetown University Law Center
- 2000 International Crime Prevention, University of Warwick, UK.
- 2000 Criminal Procedure Update Seminar, Salve Regina University
- 1999 Law Enforcement Officers' Bill of Rights Seminar, Salve Regina University
- 1998 Police Media Relations Seminar, Salve Regina University
- 1997 Police Civil Liability Seminar, Salve Regina University
- 1995 Basic Training for Detectives, Rhode Island State Police
- 1993 Search and Seizure in Schools, Rhode Island Legal/Educational Partnership

CURRICULUM DEVELOPMENT:

- 2005 Jail Liability Issues
- 2005 Arrest, Search & Seizure, and Questioning
- 2004 Legal Issues/ Case Law Update for Narcotics Investigators
- 2004 Legal and Liability Issues for Tactical Commanders
- 2004 Investigation of Officer Involved Shootings
- 2003 Legal Issues in Administrative Investigations
- 2003 Civil Liability and Risk Management for Law Enforcement Agencies
- 2002 Policy and Procedure for Law Enforcement Agencies
- 2002 Legal and Liability Issues in Public Schools
- 1993 Graduate Course, Police Civil Liability
- 1993 Providence Police Academy Entry-Level, 22 Week Program Revamp

Legal and Liability Risk Management Institute

CONSULTATION FEE SCHEDULE AND EXPENSE POLICY

Lauren Haidon v Brendan Danaher • Howd & Ludort, LLC - Kristan Maccini, Attorney • Jack Ryan, Expert

Preliminary discussions of cases: We welcome telephonic discussions of potential cases. There is no charge for this service.

Cases accepted for consultation: There is a flat case development fee when cases are accepted for consultation, development, and preparation. This case development fee is non-refundable.

FEE SCHEDULE:

\$ 8,500.00

The case development fee covers **all** work done in Providence, RI area. This includes document review and evaluation, discovery and investigation of additional materials, research, written reports and affidavits, telephone, and copying. It also includes all follow-up discussions and reviews of additional materials. If you desire to come to Providence, RI area for case conferences, there is no extra charge for this service or time and we will be glad to assist in making local arrangements. The case development fee also covers **brief** meetings with you and your associates when we are in your locale on other matters and our schedule permits. Written reports are prepared only when specifically requested by you or your firm.

We have a flat rate rather than an hourly fee structure for several reasons. First, a flat fee promotes a better professional relationship and allows you to understand the costs you and your firm will incur at the outset. Second, we want to be an integral part of your case development to the fullest extent appropriate. The fee is structured to encourage you to draw upon this involvement and experience and to utilize us fully. Only then can we give you the best possible advice and be able to fully assist in presenting your case. When you consider our involvement with your case, we don't want you to feel constrained by the thought that the meter is running. Our experience in police civil litigation cases offer strategies, tactics, and demonstrative trial aids makes us a valuable resource in preparation, discovery and case development. Our experience in conducting training on liability issues and police agency audits provides you with a source of current and pragmatic knowledge of police practices.

Expanded cases: are those, which require much more time and generally involve agency pattern and practice, negligent retention, wrongful termination and other personnel related matters. Such cases require extensive documentation review. - personnel records, administrative hearing transcripts, and/or administrative investigation files and adjudications. We can usually determine whether yours is an expanded case during our initial discussion or soon after the initial review of materials based on time.

Initials: KMM
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Expedited cases: are those cases in which a report or evaluation is required within two (2) weeks of the date Legal and Liability Risk Management Institute are retained in the matter and result in an additional \$2,500 expedite fee.

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Depositions, testimony, on-site inspections, and conferences: We will normally try to arrange our travel schedule to ensure meeting with you and your associates prior to deposition or testimony. Depositions are very taxing on both the deponent and the person(s) conducting the deposition. Therefore, it is our policy limit a deposition day to a maximum of eight (8) hours including breaks.

Depositions in Providence, RI area: \$2500. per day or part thereof

Deposition Fees must be paid prior to all depositions.

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Work away from Providence, RI area: \$2500.00 per day or part thereof plus a \$1000.00 fee for travel days:

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Expenses at actual cost: Airline travel will be at coach fare. When travel coincides with other business, costs are billed proportionally. Ground expenses, hotel, meals and incidentals are billed at actual cost. We reserve the right to require prepayment of these expenses.

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Revised reports: After final report has been accepted supplemental reports and review of additional material will be invoiced at \$250.00 per hour.

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Case Material: Non-Digital will be digitized for case development at a rate of \$200.00 per hour.

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Payment requirements: The case development fee is required before we review your material. Other fees and expense reimbursement are due when we arrive at your location unless other written arrangements are agreed upon. All bills are payable, in any other case, within 30 days of the work performed. We reserve the right to charge a fee of one percent (1%) per month on the outstanding balance. The tax identification number to be used for Legal and Liability Risk Management Institute/Law Enforcement Risk Management Group, Inc., Federal ID 81-0692135

Professional relationship: You are entering into a professional relationship with Legal and Liability Risk Management Institute for litigation consultant assistance with your case. **You and your firm, not your client or opposing litigants, are our client.** You and your firm are solely responsible for payment of our professional services. Any fee and/or expense incurred for deposition by the opposing side reverts to your firm if that entity fails to fulfill this obligation or if a court order reduces the fee or expense charge. Your firm is responsible for the increment should the court reduce the fee or expense charged. Please do not ask us to wait for reimbursement from your client. We also do not accept payment directly from your client unless prior arrangements have been agreed upon.

Agreement: This document constitutes a contract for our professional services in return for your agreement to reimburse us according to the terms and conditions of this document. The contract is governed by the terms and conditions set forth herein. This contract is intended to be enforceable under the laws of the State of Indiana or in the State in which the services are rendered, at the discretion of Legal and Liability Risk Management Institute.

AGREED TO:

09/30/2021

Date

Kristan Maccini
Kristan Maccini (Sep 30, 2021 12:49 EDT)

Signature

ACCEPTED:

9/30/2021

Date

[Signature]
Legal and Liability Risk Management Institute

Legal and Liability Risk Management Institute
Law Enforcement Risk Management Group, Inc.
700 N. Carr Rd, #595, Plainfield, IN 46168
Federal ID 81-0692135
317-386-8325 www.llrmi.com

Please send all material for review and case development to the Plainfield, IN address or electronically to: amanda.napier@llrmi.com