

# EXHIBIT 109

~~FILED UNDER SEAL~~

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the  
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**EXPERT REPORT OF CHRISTOPHER BURBANK**

I, Christopher Burbank, hereby declare:

I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so competently as follows:

**I. BACKGROUND**

1. I served in the Salt Lake City, Utah police department for 23 years, from 1991 to 2015. I was appointed Chief of Police in 2006 and served in that capacity for nine years until my retirement in 2015. Prior to my appointment as Chief of Police, I served in various capacities, including as Bureau Commander, responsible for managing the operations of the police department; Division Commander, responsible for internal investigations and in-service training; Executive Officer to the Chief of Police; Olympic Venue Commander; S.W.A.T. Team Leader; and Training Officer.

2. Much of my work in leadership capacities with the Salt Lake City Police Department involved issues surrounding immigration enforcement, racial profiling, and civil

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rights and civil liberties in policing. In addition to executing my overall responsibility to ensure that the officers under my supervision safeguarded the civil rights of the individuals and communities we served, including immigrant communities, I implemented grievance and accountability mechanisms, designed and produced materials on individual rights during police encounters, and interacted extensively with minority and immigrant communities. In 2009, I participated in the Police Foundation national conference with more than 100 law enforcement administrators and executives to discuss issues relevant to immigration enforcement. I also participated in the U.S. Department of Justice’s Civil Rights Division’s 2009 Title VI Conference, and in May 2010, I and nine other police chiefs met with Attorney General Eric Holder regarding policing and immigration enforcement issues.

3. I testified before the U.S. House of Representatives Committee on the Judiciary, Subcommittee on Immigration Policy and Enforcement, concerning H.R. 3808, known as the “Scott Gardner Act.” I also testified before the U.S. House of Representatives Committee on the Judiciary, Subcommittee on the Constitution, regarding H.R. 963, the “See Something, Say Something Act.” Finally, I testified before the U.S. House of Representatives Committee on the Judiciary on Racial Profiling and the use of Suspect Classifications in Law Enforcement Policy.

4. I am currently President of the National Executive Institute Associates, a private, nonprofit organization of chief executives of the largest law enforcement agencies throughout the United States, Canada, Australia, and Europe. I also served as First Vice President of the Major Cities Chiefs Association, an assembly of the 75 largest policing agencies in the United States and Canada.

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5. I currently serve as Vice President of Strategic Partnerships at the Center for Policing Equity, a nonprofit think tank that uses quantitative analysis to help police departments design equitable strategies for pursuing public safety and community engagement.

6. I have a Bachelor of Science degree in Sociology from the University of Utah, and I am a graduate of the Federal Bureau of Investigation’s National Executive Institute. A copy of my resume is attached as Exhibit A.

7. I have not testified as an expert at trial or by deposition in the last four years, nor have I authored any publications in the last ten years. I have not received compensation and have agreed to serve as an expert in this matter on a pro bono basis. I will be reimbursed for reasonable expenses, if any, incurred in the course of my work on this case, such as travel expenses, including the actual costs of transportation, meals, and lodging.

8. The opinions here are based on my background and experience in law enforcement, my work at the Center for Policing Equity, and my review of documents produced in discovery in this lawsuit beginning at the following Bates numbers: DEF-00000200, CAR000001, CAR000008, CAR000010, CAR000084, DEF-0094979, DEF-00044548.0001, DEF-00138573, DEF-00024823, DEF-00138577, CAR000751, CAR001789, CAR001963.

**II. OPINIONS**

9. Counsel for the Plaintiffs have asked me to provide my opinion about the Controlled Application Review and Resolution Program (CARRP), including (1) whether CARRP is consistent with law enforcement principles and serves an important law enforcement purpose, and (2) the criteria and indicators for identifying immigration benefits applicants as “national security concerns.”

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**A. Law enforcement and immigrant communities**

10. A bedrock principle of effective law enforcement is that relationships between police and the communities they serve must be based on trust. When members of the public believe law enforcement officers act fairly and in good faith, they are willing to permit officers not only to safeguard their well-being in moments of crisis but also to handle sensitive information about themselves and others in order to prevent or deter criminal behavior. Conversely, law enforcement officers cannot effectively gather vital information about crime if witnesses or victims mistrust or fear the police. If victims of crime are reluctant to seek help from law enforcement, that naturally gives criminal actors greater latitude to act unlawfully and leads to higher crime rates in affected communities.

11. Equally important is that law enforcement action that implicates individual rights must be grounded in the established standards of reasonable suspicion and probable cause. These standards require officers to develop articulable facts indicating criminal activity prior to conducting an investigative stop and to base any arrest on probable cause to believe that a person has committed a crime.

12. Departing from these standards not only violates constitutional rights but also undermines effective law enforcement. Identity-based profiling—*i.e.*, law enforcement conduct predicated not on reasonable suspicion of criminal behavior but on race, religion, national origin, or other protected characteristics—is neither a valid nor effective way to predict whether someone is engaged in or contemplating a crime. Far from helping to address crime, identity-based profiling antagonizes communities by sweeping up innocent people and wasting valuable resources. Ultimately, it undermines law enforcement agencies' ability to fight the very thing they are concerned about because it damages the community's trust in law enforcement.

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13. Law enforcement cannot avoid the problems associated with identity-based profiling by using behavior-based “indicators” that are not reliably associated with criminal conduct. For instance, during my tenure as Chief of Police, Utah policymakers argued that a lack of proficiency with the English language should constitute reasonable suspicion to stop and detain an individual. Limited language skills are not indicative of criminal behavior. Such overbroad indicators are ineffective and counterproductive. Like identity-based profiling, they sweep up commonplace, innocent conduct and waste law enforcement resources. They also inevitably permit law enforcement officers to use their discretion in ways that improperly give vent to bias.

14. Relatedly, transparency is critical to effective law enforcement. Individuals and communities have a right to know the standards, criteria, and procedures by which they are being policed. Secrecy and lack of transparency in law enforcement, particularly where law enforcement conduct has consequences at a community-wide scale, foster suspicion about that conduct and undermine the trust that is so critical to maintaining public safety.

15. These principles are particularly important vis-à-vis immigrant communities, especially in a nation as diverse as ours. Immigrants, especially more recent immigrants, can be more vulnerable to crime and less likely to report it or trust law enforcement to protect them. There also may be language barriers or misunderstandings based on cultural differences. Effective policing among immigrants and immigrant communities requires and depends on trust and perceptions of good faith that are difficult to maintain when public and political discourse stigmatize and portray immigrants as crime-prone or posing a heightened risk to public safety.

16. Such perceptions of immigrants are not only xenophobic but also plainly inaccurate. Immigrants and immigrant communities in the United States are overwhelmingly law

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abiding. Research conducted over several decades has consistently shown that immigrants are less likely to commit serious crimes or to be incarcerated than non-immigrants. This holds true whether immigrants are documented or undocumented and regardless of their country of origin. Studies conducted by the Cato Institute and the Sentencing Project, for instance, found that undocumented individuals are actually less likely to commit crimes compared to other segments of the population. Michelangelo Landgrave & Alex Nowrasteh, Cato Institute, *Criminal Immigrants: Their Numbers, Demographics, and Countries of Origin* 1 (2017); Nazgol Ghandnoosh & Josh Rovner, The Sentencing Project, *Immigration and Public Safety* 5 (2017). Indeed, during times when undocumented immigration has increased, both violent and property crime has decreased dramatically. There is no demonstrable correlation between immigrants and crime.

17. Additionally, there is no documented relationship between enhanced immigration enforcement and reduced crime. Rather, heightened immigration enforcement can erode trust and frustrate effective policing because it often involves targeting people through what amounts to racial or national origin-based profiling. In April 2009, I asked the Consortium for Police Leadership in Equity (CPLÉ) to assist the Salt Lake City Police Department in evaluating the consequences of state legislation encouraging the practice of cross-deputizing officers for the purpose of immigration enforcement. CPLÉ is a research consortium that pairs social scientists with law enforcement agencies to conduct empirical research on equity-related issues. The research revealed that providing municipal police the powers of federal immigration agents is likely to discourage cooperation with law enforcement and encourage contempt and suspicion, making civilians less convinced of law enforcement officers' legitimacy. In fact, one in three law-abiding citizens surveyed said they would not report certain serious crimes if police

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officers were empowered to determine citizenship status. That would render all people more susceptible to violent criminal behavior—particularly the most vulnerable segments of the population.

18. Just as enhanced immigration enforcement does not reduce crime, policy measures at the federal or state levels that stigmatize, victimize, or alienate immigrant or minority communities can have negative effects on policing at the local level. In my experience, community members do not typically distinguish between federal, state, or local authorities when assessing whether they can interact with such authorities safely and without facing immigration consequences. Thus, the introduction of legislation in Utah targeting undocumented immigrants had a chilling effect on victims and witnesses of crime in Salt Lake City and resulted in polarization within communities and neighborhoods—notwithstanding the persistent efforts of the Salt Lake City Police Department under my leadership to maintain community trust in the face of such measures. In this way, marginalizing significant segments of the population ultimately harms effective community policing.

**B. Opinions about CARRP**

19. Based on my review of documents produced by the defendants, I understand that in April 2008, U.S. Citizenship and Immigration Services (USCIS) established CARRP, which USCIS describes as a process for identifying and processing immigration benefits applications that present “national security (NS) concerns.” CAR000001. CARRP review proceeds in four steps: 1) identifying a national security concern; 2) “internal vetting” and assessing eligibility for the sought-after immigration benefit; 3) “external vetting” with outside agencies; and 4) adjudicating the applications. CAR000003-5. Applicants subjected to CARRP processing



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therefore face greater scrutiny, and a more difficult path to approval of their applications, than other applicants.

20. Although the USCIS officers who execute CARRP processing may not be traditional, commissioned law enforcement officers, the stated purpose of the program is to identify individuals who are or may be engaged in dangerous conduct. CAR000008. Longstanding principles that guide law enforcement in identifying such individuals are therefore relevant to evaluating the standards and procedures governing CARRP.

21. In attempting to identify “national security concerns,” USCIS distinguishes between individuals designated as “Known or Suspected Terrorists” (KSTs)—a category of people who have been placed in the Terrorist Screening Database (TSDB), also known as the master watchlist—and those labeled “non-KSTs”—applicants who have not been placed on the master watchlist but who USCIS nonetheless believes may still raise national security concerns. CAR000001. I focus here on the standard and criteria for identifying non-KSTs.

22. The threshold that USCIS uses in identifying non-KSTs is very low. According to CARRP guidance, officers should identify an “articulable link between the individual and one or more indicators” of a national security concern. CAR000020. The “articulable link” standard is not drawn from, or consistent with, accepted standards governing law enforcement conduct. It appears to require little more than the ability to verbalize some connection to one of USCIS’s indicators. From a law enforcement perspective, it lacks two crucial elements. First, it does not require intent. The “articulable link” apparently can encompass incidental or unknowing connections to indicators—plainly sweeping in innocent, lawful associations or conduct. Second, it lacks any requirement that the connection be objectively reasonable. Absent that requirement,

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officers can easily articulate a connection based on their own subjective (and often bias-driven) perceptions.

23. While this standard could scarcely be lower, it does not appear that USCIS actually requires officers to adhere to it in referring applicants for CARRP processing. Instead, CARRP guidance states that officers can refer an applicant for CARRP processing based on the presence of indicators alone, even absent an “articulable link.” CAR000786-87. Thus, USCIS does not even impose the nominal “articulable link” threshold for placing an applicant in the CARRP process. Logic dictates that the absence of any such threshold dramatically expands the latitude and discretion that USCIS officers can exercise in referring an applicant for CARRP processing, and significantly increases the likelihood of arbitrary or discriminatory referrals.

24. To make matters worse, USCIS’s guidance on whether and how the “articulable link” standard applies is highly ambiguous. In my experience, law enforcement officers generally take seriously the legal standards and thresholds set by law or agency policy. It is therefore important that such standards and thresholds be clear, unambiguous, and as straightforward as possible. My review of CARRP guidance documents, however, yielded little clarity on how to apply the “articulable link” standard; indeed, various portions of the guidance are contradictory on this issue. It is difficult to see how even well-meaning USCIS officers could interpret and apply the “articulable link” standard consistently and fairly.

25. Separately, CARRP guidance sets forth substantive “indicators” USCIS associates with non-KST national security concerns. These indicators fall into three categories: (1) Employment, Training, or Government Affiliations; (2) Other Suspicious Activities; and (3) Family Member or Close Associate. CAR000086-87.

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26. Under the first category, CARRP guidance explains that “[c]ertain types of employment, training, government affiliation, and/or behavior may (or may not) be indicators of a NS concern, depending on the circumstances of the case, and require additional scrutiny to determine whether a NS concern exists.” CAR000086. It further states that “[o]fficers may also need to consider proficiency in particular technical skills gained through formal education, training, employment, or military service, including foreign language or linguistic expertise, as well as knowledge of radio, cryptology, weapons, nuclear physics, chemistry, biology, pharmaceuticals, and computer systems.” *Id.*

27. Of the second category, USCIS states, “Certain other types of suspicious activities may (or may not) be indicators” of a national security concern. This category appears to encompass a broadly defined array of conduct USCIS deems potentially suspicious, including:

- a. “Unusual travel patterns and travel through or residence in areas of known terrorist activity”;
- b. [REDACTED]
- c. [REDACTED]
- d. [REDACTED]
- e. [REDACTED]
- f. [REDACTED]

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28. Similarly, USCIS identifies [REDACTED] as “unusual circumstances” that may be indicators of a national security concern. CAR0001908. USCIS guidance also indicates that national security indicators can arise from an individual [REDACTED] CAR0001908.

29. USCIS describes the third category (“Family Member or Close Associate”) as follows:

In some instances, the officer may be aware that the petitioner, beneficiary, applicant, dependent, or derivative is a family member or close associate of a subject with a NS concern. Such information may impact the individual's eligibility for the benefit sought and/or may indicate a NS concern with respect to the individual. In these cases, the officer must determine if the NS concern relates to the individual, and if so, if it gives rise to a NS concern for the individual. A close associate includes but is not limited to a roommate, co-worker, employee, owner, partner, affiliate, or friend.

CAR000087.

30. The indicators USCIS uses to identify non-KST national security concerns raise profound concerns. From a law enforcement perspective, these indicators are not validly or reliably indicative of potential criminal behavior. They necessarily encompass significant amounts of wholly innocent or constitutionally protected conduct. Identifying people as potential national security concerns based on their [REDACTED] [REDACTED] is illogical, unfair, and antithetical to basic law enforcement practice. Similarly, identifying people as national security concerns based on their familial relationships, [REDACTED], penalizes them for *who they are*—characteristics beyond their control—as opposed to whether there is an objective basis for suspecting that they have engaged in unlawful *conduct*.

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31. The indicators that USCIS uses to identify non-KST national security concerns are also highly subjective. Repeated use of vague descriptors such as “unusual” give officers vast latitude to interpret the indicators in divergent, arbitrary, or discriminatory ways. The categories of indicators, moreover, are essentially unbounded. By setting out non-exclusive lists of potential indicators, and including the catchall category “Other Suspicious Activities,” USCIS leaves its indicators undefined and open-ended, again opening the door to unfair or biased application of the indicators.

32. Finally, using indicators such as these is almost certainly a waste of time and resources. Because many of the indicators are commonplace, they are associated with an overwhelming number of people, the vast majority of whom are not dangerous or criminal actors and have done nothing wrong. Casting such a wide net diverts resources, erodes morale, and can prevent officers from focusing on actual unlawful conduct.

33. Thus, many of the indicators that USCIS relies on to identify non-KST national security concerns for CARRP processing are not grounded in valid law enforcement practice and should not be considered reliable indicators of potential criminal conduct. Based on my experience, the indicators do not actually facilitate meaningful investigations, and the risk that such indicators will not be used consistently or fairly is very high.

34. Additionally, from a law enforcement perspective, CARRP does not meaningfully advance public safety. First, the program lacks a valid security-based rationale: Nothing about granting or denying immigration benefits makes someone more or less dangerous. In fact, applying for an immigration benefit draws attention to the applicant in a way that would be counterintuitive and risky for someone intending to engage in terrorism or any other crime implicating national security. I am unaware of any data supporting the notion that individuals

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making legal application for status within the United States pose a greater risk to the public or are deserving of more intense scrutiny than others in the United States, especially those residing and working in the United States for long periods of time. As explained above, immigrants and immigrant communities on the whole are extraordinarily safe and law-abiding, so the heightened scrutiny that the CARRP process entails does not appear to be grounded in empirical data.

**III. CONCLUSIONS**

35. Based on my experience, CARRP is more likely to undermine public safety and security than promote it. Like other immigration enforcement measures adopted by federal and state governments in recent years, CARRP casts suspicion on immigrants broadly and without sufficient justification—an approach that is alienating, stigmatizing, and ultimately counterproductive from a law enforcement standpoint. The kind of broad-brush approach that CARRP entails has all too often victimized individuals and communities of color.

36. By casting a wide net of suspicion and withholding information from applicants about the nature of that suspicion, CARRP undermines applicants' trust in the immigration process and government actors more broadly. As explained above, the erosion of that trust is itself a cause for significant concern, because when individuals and communities lack trust in government and law enforcement, they do not report crimes or contact the police during emergencies.

37. It is not appropriate to brand someone as a national security concern based on certain profiles, characteristics, or unproven allegations to which an applicant does not have an opportunity to respond. Doing so does not serve, and is in fact contrary to, the goals of law enforcement. If anything, it antagonizes already-vulnerable communities and will make members of those communities more hesitant to engage with the government in the future.

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38. If USCIS had consulted me regarding CARRP prior to its implementation, I would have advised that the program is inconsistent with effective policing principles and would likely harm vital relationships between law enforcement and immigrant communities.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of February 2020 in Salt Lake City, Utah.



CHRISTOPHER BURBANK

## Exhibit A

**Chief (Retired) Chris Burbank**  
992 S. Vista View Drive  
Salt Lake City, Utah 84108

chris.burbank@policingequity.org

801-799-3802

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### Education

**Bachelor of Science, Sociology**

University of Utah

**Center for Policing Equity**  
2015 to present

**Vice President of Strategic Partnerships**

2015 to present

Provide leadership and promote partnerships with police departments, community advocates and political entities. The Center for Policing Equity is a nonprofit organization whose mission is to end disparities in law enforcement by providing evidence-based research on racial bias and use of force. The Center produces analyses identifying and reducing causes of racial disparities. Distinguished by taking number off the spreadsheet and providing actions for the police and the communities they serve.

*Achievements:*

- Mapping the Science of Justice Convening 2018.
- Responsible for The National Justice Database reaching over 250 law enforcement agencies across the nation and covering over two thirds of the United States Population.
- Reviewed and advised the Seattle Police Department on use of force utilized during mass gathering events.

**Salt Lake City Police Department**  
1991 to 2015

**Chief of Police**

2006 – 2015

Appointed to the position of Chief of Police in March 2006. Accountable for leadership of a 603-employee organization, including 445 sworn police officer positions. Provide necessary measures and direction for the protection of life and property, prevention of crime, vehicular traffic control and apprehension of criminals. Responsible for \$57 million annual budget, including state and federal grant awards. Work with residents and political entities in determining direction of community well being and safety.



*Achievements:*

- Selected as a member of the “Enlightened Fifty” most influential leaders in the State of Utah.
- Selected as one of six Police Chiefs in the nation to meet with President Barack Obama to discuss the Administration’s plan and direction concerning gun violence in America.
- Recognized in June 2013 by the Utah National Guard with their annual Minuteman Award for contributions to the well being of the State of Utah.
- Honored by the University of Utah in Recognition of continuous service and commitment to “Keeping the Dream Alive” through the annual Rev. Dr. Martin Luther King, Jr. Rally and Parade.
- Received the United States Attorney’s Office District of Utah Award, for Outstanding Service to the Community by demonstrating leadership, diplomacy, and tact in dealing with high profile protest situations.
- Testified before the United States House of Representatives Committee on the Judiciary, Subcommittee on Immigration Policy and Enforcement concerning H.R. 3808, the “Scott Gardner Act.”
- Chosen by the Salt Lake Tribune as Utahn of the Year for 2011. The state’s largest newspaper cited his handling of several high profile protest incidents and stated, “Burbank’s stature as a community leader, including a willingness to endure threats and criticism over his position on immigration enforcement, is noteworthy at a time of ebbing confidence in those elected to govern.”
- Honored by the Utah Chapter Parents of Murdered Children, Inc. for tireless effort to serve the many homicide families and a willingness to give support and to give hope.
- Recognized by the Latin America Chamber of Commerce with Simon Bolivar Award for service to the Latino community.
- Received the Arch Madsen Humanitarian Award from the Inclusion Center for Community and Justice in recognition of dedication to creating a more inclusive community.
- Testified before the United States House of Representatives Committee on the Judiciary, Subcommittee on the Constitution regarding H.R. 963, the “See Something, Say Something Act of 2011.”
- Traveled to Israel on behalf of The American Israel Public Affairs Committee (AIPAC) to further Israeli-American relations.
- Received the Caesar Chavez peace and Justice Award by the Utah Coalition of La Raza.
- Nominated and elected in 2010 by peers to the position of First Vice President for the Major Cities Chiefs Association, an assembly of the 69 largest policing agencies in the United States and Canada.
- Honored in 2010 for work on behalf of the women and children who live, play and grow in Salt Lake City by the YWCA as the Public Official of the Year.
- Recognized by the Utah Minority Bar Association as their Honoree of the Year for service to minority communities and dedication to diversity.
- Testified before the United States House of Representatives Committee on the Judiciary, Subcommittee on the Constitution, Civil Rights and Civil Liberties, Hearing on Racial Profiling and the Use of Suspect Classifications in Law Enforcement Policy.

- Received the Downtown Alliance Chairman's Award for service to the downtown community and the City.
- Responsible for creation of the Valley Police Alliance in 2009, a cooperative effort of 15 Salt Lake valley police agencies serving as Chair during its inception.
- Received special recognition in 2009 from the American Civil Liberties Union of Utah for work in protecting immigrant civil rights.
- Received the Vicki Cottrell Community Hero Award from the Utah National Alliance on Mental Illness for assistance to individuals suffering from mental illness.
- Recognized by Latino Community Center for dedication to community policing in building and maintaining a great foundation with the Latino community.
- Recognized by the Islamic Society of Greater Salt Lake in appreciation for dedicated service to the Islamic community.
- Traveled to Israel at the invitation of Anti-Defamation League (ADL) to exchange policing practices and ideas.
- In 2007, the Department received high praise for its Emergency Action Team coordination and response to the Trolley Square shooting incident.
- Recognized for management of the Destiny Norton abduction and murder investigation. The seven-day investigation resulted in the conviction of the suspect five months following the crime.

**Bureau Commander Support Services**

2005 – 2006

Managed Internal Affairs, Training, Dispatch, Records and Personnel Services. Accountable for managing the operation of the Police Department, preparing the annual budget and ensuring the functionality of police services to the community. Served as the acting Chief during the absence of the Chief. Provided leadership and direction for personnel, focusing the Police Department on service to the City of Salt Lake.

*Achievements:*

- Developed five-year departmental guidelines to ensure continuity of goals and to provide a strategic plan for the Police Department.
- Designed and produced *Interacting with the Police*, a pamphlet outlining the rights of the public when encountering police officers.

**Division Commander Internal Affairs / Training**

2005

Responsible for the oversight of complaints against personnel and direction of resulting investigations, including ensuring discipline and grievances are handled in accordance with applicable regulations, policies, laws and appropriate memoranda. Accountable for managing in-service training of sworn officers and civilian employees as well as recruit officer training. Participating in the development and preparation annually of the Police Department budget while maintaining the largest portion of the overall Department budget.

*Achievements:*

- Oversaw the development, writing and implementation of Departmental Electrical Energy Device policy.

- Participated as Chair of the Police Physical Fitness Committee with responsibility for the evaluation and potential implementation of department-wide, mandatory officer fitness standards.

**Executive Officer to Chief Dinse**

2002 – 2005

Represented the Chief of Police while functioning as a liaison with Salt Lake City Mayor Rocky Anderson, the Salt Lake City Council, the Civilian Review Board and the public. Prepared correspondence, presentations and speeches for Chief Dinse. Coordinated Department participation at Major Cities Chiefs' conferences. Consulted with and advised Chief Dinse in matters of policy, procedure, discipline and personnel.

*Achievements:*

- Designed and facilitated implementation of Employee Management and Information Tracking System (EMITS), a system established to more efficiently monitor employee career progress.
- Working in cooperation with the Salt Lake Police Association, drafted and instituted a new Police Department discipline policy. This new policy represents a dramatic and innovative shift in practice and approach to discipline management.
- Facilitated the West Point Leadership Program, a college level course established to enhance individual leader capability and provide insight into enlightened and proven supervisory techniques.

**Olympic Venue Commander**

2000 – 2002

Planned, organized and implemented the security plan for the Salt Lake Olympic Square, encompassing nine square blocks of downtown Salt Lake City and employing a staff of over one-thousand local, state and federal employees including Utah National Guard troops. Acted as Police Department liaison with the United States Secret Service.

*Achievements:*

- Recognized by Director Brian Stafford, United States Secret Service, for outstanding cooperation in support of their protective mission.
- Recognized by Governor Michael Leavitt, State of Utah, for contribution to the law enforcement volunteer program.
- Recognized by Major General Brian L. Tarbet, Adjutant General Utah National Guard, for exceptional meritorious service in support of the games.

**Pioneer Bicycle Squad Sergeant**

1999 – 2000

Daily supervision of ten bicycle officers and direction of squad's patrol functions in the downtown area. Coordinated in-service bicycle training as well as annual officer selection school. Participated in the planning and organization of "First Night" activities.

*Achievements:*

- Awarded Meritorious Unit Citation in recognition for outstanding service to the downtown area.
- Regular guest of *La Vox La Gente*, a local radio program designed to improve community and police relations.
- Organized and instated program access within the community, with a goal of providing equal access to police resources and services to all members of the community regardless of ethnicity or socio-economic status.

**S.W.A.T. Team Leader**

1998 – 1999

Supervised the Sniper section including participating as an active member of the squad. Coordinated planning and deployment of a thirty person tactical unity during high hazard warrant service, barricaded subject incidents and hostage situations.

**Training Officer**

1996 – 1998

Responsible for in-service and recruit training in all aspects of police work including firearms, ASP, aerosol defensive tools, defensive tactics and police policy and procedure. Coordinated and instruct civilian police academies designed to provide members of the public insight into police training and response.

*Achievements:*

- Awarded Distinguished Unit Citation in recognition for service to the Police Department and the community.
- Managed Career Path Program as coordinator; responsible for scheduling, testing, policy and program maintenance, including record keeping and participant relations.
- Developed and instituted Police Rifle Program. Drafted policy, instructional guidelines and instructed initial four classes.

**S.W.A.T. Team Member**

1992 – 1998

Participated in the service of over 200 high hazard search warrants, numerous barricaded subject incidents and several high profile hostage incidents. Responsible for organizing weekly in-service training including scheduling, determining training topics, instructor coordination and class instruction as team training coordinator.

*Achievements:*

- Awarded Distinguished Unit Citation in recognition for service to the City during the Salt Lake City Public Library hostage incident.
- Recognized as a Hero in the Community by Whittier Elementary School.

**Uniformed Gang Officer**

At the specific request of the department, participated in a thirty-day pilot gang unit. The effectiveness of the unit and the increasing problem of gang violence necessitated the assignment

be made permanent. Participated in daily enforcement activities designed to reduce violence and limit civilian exposure to harm.

*Achievements:*

- At the request of the Salt Lake Area Gang Project, instructed officer safety at the sixth annual Utah Gang Conference, presented to individuals in attendance from throughout the western United States.
- Developed Street Survival course for the Utah Gang Investigators' Association and instructed at numerous conferences held in the State.

### **Other Work Experience**

**DG Pro Shop – Salt Lake City, UT** 1989 – 1991  
**Owner/Manager**

Responsible for inventory, ordering, cash receipts, sales and customer relations as a partner in a small, retail sporting goods store. Managed between three to five part-time employees including payroll, taxes and social security.

**Professional Squash Player** 1988 – 1991

Turned professional in the fall of 1988 and as a member of the World Professional Squash Association (WPSA), achieved a number 38 world ranking by 1990. Responsible for instruction of private and group squash lessons as well as clinics and exhibitions.

*Achievements:*

- 1<sup>st</sup> Place H.H. Bennett Cup, 1990
- 1<sup>st</sup> Place Utah State Open, 1990, 1989 and 1988
- 1<sup>st</sup> Place Intermountain Open, 1989

**Deseret Gymnasium – Salt Lake City, UT** 1984 – 1991  
**Assistant Athletic Director**

Supervised employees, organized and directed squash, racquetball and handball tournaments. Provided fitness consultation for members. Responsible for daily gym administration, personnel issues as well as maintaining member relations.

*Achievements:*

- Organized the Deseret Gym World Professional Squash Championship. Raised sponsorship money, organized promotion and advertising and handled player relations and ticket sales.

**Fin USA**  
**Director of Squash Sales** – Salt Lake City, UT

1988 – 1989

Responsible for the advertising, promotion and sales of squash equipment nationally.

### **Professional Organizations and Training**

<b>FBI National Executive Institute Associates</b>	Current President
<b>Major Cities Chiefs Association</b>	Past First Vice President
<b>Rocky Mountain High Intensity Drug Trafficking Area</b>	Past Chairman
<b>Utah Peace Officer Standards and Training</b>	Council Member
<b>FEMA Regional Advisory Council</b>	Board Member
<b>FBI Intermountain West Regional Computer Forensics Laboratory</b>	Board Member
<b>FBI RCFL National Advisory Committee</b>	Board Member
<b>FBI National Executive Institute Associates</b>	Board Member
<b>FBI National Executive Institute</b>	Session XXX Graduate
<b>International Association of Chiefs of Police (IACP)</b>	Member
<b>National Association for the Advancement of Colored People</b>	Member
<b>Police Executive Research Forum (PERF)</b>	Member
<b>Fight Crimes Invest in Kids</b>	Member
<b>Rotary Club 24 of Salt Lake City</b>	Member
<b>West Point Leadership Course</b>	2001 Graduate