

## Trevor R. Hewick

Private Civil and Criminal Defense Investigator  
Expert Witness Testimony  
Post-Conviction Investigations  
Consultant on Police Department Operating Procedures  
Licensed in Maryland and Florida

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www.protocolsecurityagency.com



## CURRICULUM VITAE

### Owner / Sole Proprietor of Protocol Security Agency:

- Private Civil and Criminal Defense Investigator
- Security Guard and Patrol Services

### Law Enforcement Experience

1978 – 1999 Metropolitan Police Department Position: Detective Grade II  
6001 Georgia Ave NW, Washington, DC 20011

- Violent Crime Detective (10 Years)
- Midnight Patrol Officer (10 Years)
- Establishing and Gathering of Human Intelligence
- Training Officer for Probation Officers and Detectives
- Police Cadet (1973-1975)

### Qualified as an Expert Witness:

State of Maryland Circuit and District Court

- Use of Force Investigations and Arrest Procedures and Policies
- Conducting Criminal Investigations, Report Writing, and Arrest Policies
- Police Department General Orders and Standard Operating Procedures

United States District Court

- MPDC General Orders and Police Investigations
- Use of Force Investigations

District of Columbia Superior Court

- Metropolitan Police Department (MPDC) General Orders and Police Tactics
- MPDC Police Investigations
- Reconstruction of Crime Scenes

Alcohol Beverage Regulation Administration Board (ABRA) for the District of Columbia

- Reconstruction of Crime Scenes
- Consultant and Instructor for Security Guards
- Force Continuum Wheel Instruction

## Education

- Degree 1998 Bachelor of Science  
University Maryland University College, College Park, Maryland 20742  
Major: Criminal Justice Minor: Business Management Studies
- 2019 – Present Master’s Degree (working towards)  
University Maryland University College, College Park, Maryland 20742  
Major: Management-Criminal Justice

## Government Investigative Contracts:

State of Maryland Office of the Attorney General (OAG) 2016 – current

- Civil Defense Investigations
  - Wrongful Death and Use of Force Complaints
  - False Arrests/Imprisonment Complaints
- EEOC Investigations

State of Maryland Office of the Public Defender (OPD) 2004 - current

- Criminal Defense Investigations
- Consultant on Police Department General Orders and Standard Operating Procedures
- Consultant on Police Investigations

United States Federal Government Criminal Justice Act (FPD-CJA) 2002 – current

- Criminal Defense Investigations
  - U.S. vs Al Imam (Benghazi Consulate Attack, \*Death Penalty Case)
  - U.S. vs Larry Wilkerson (Domestic Drug Conspiracy, \*Death Penalty Case, Murder Inc.)
  - U.S. vs Gregory Sitzmann (International Drug Conspiracy)
  - U.S. vs Larry Gooch (Domestic Drug Conspiracy, \*Death Penalty Case)
  - U.S. vs James Becton (Domestic Drug Conspiracy)
  - U.S. vs Jonte Robinson (Domestic Drug Conspiracy)
  - U.S. vs John Haire (International Drug Conspiracy)
  - U.S. vs Yong Jun Yao (International Counterfeiting and Contraband Smuggling Conspiracy)
- Criminal Defense §2255 Investigations
  - §2255 Investigation Rodney Moore vs U.S.
    - Ineffective Assistance of Counsel and Investigator
    - Prosecutorial Misconduct
    - Police Officer Misconduct
    - Cooperating Witnesses (CWs) colusion on testimony, while in custody
    - Prisoner Guards fratination with CWs (drugs, contraband, sexual favors, etc.)
    - Due Process Violations
    - Indictment Errors
    - Abuse of Grand Jury Witnesses
    - Jury Instruction Violations
  - §2255 Investigation Anderson Straker vs U.S.
    - Ineffective Assistance of Counsel and Investigator
    - Prosecutorial Misconduct
    - Police Officer Misconduct
    - Cooperating Witnesses (CWs) colusion on testimony, while in custody
    - Due Process Violations
    - 5<sup>th</sup> Amendment Violations
  - §2255 Investigation David Wilson
    - Ineffective Assistance of Counsel and Investigator

## Private Investigative Contracts

- Criminal Defense Investigation
  - State of Maryland vs John Delich (1<sup>st</sup> Degree Armed Assault on a Police Office) Not Guilty
  - U.S. vs Joseph Price et al. (Swann Street Conspiracy to Commit Murder) Not Guilty
  - State of Maryland vs Robert Pearson (Armed Carjacking) Not Guilty
  - State of Maryland vs Dr. Frederick Corder (Animal Abuse) Plea w/Home Detention
  - State of Maryland vs Abere Karibi-Ikiriko (Murder) Not Guilty
  - U.S. vs Michael Nmagu (Medicaid and Medicare Fraud) Plea w/Home Detention
  - U.S. vs Mark Parentau (17x Sexual Abuse Minor) Plea 1x Count w/18 months Detention
  - State of Maryland vs Dean Pantazes (1<sup>st</sup> Degree Murder) Guilty
  - U.S. vs Wassim Saleh & Ehab Saleh (Medicaid and Medicare Fraud) Plea w/Probation
- Civil Plaintiff Investigation
  - J. Abregado vs Montgomery County Police Department (False Arrest w/injury)
  - Kimberly M. Parker vs Annapolis City Police Department (False Arrest and Detention)
  - Nnaemeka Okoli vs Mountgomery County Police Department (False Arrest w/injury)
  - JGL vs Deonte Caraway and PG County School System (Sexual Abuse of Students)
  - JGL vs Party Bus (Wrongful Death)
  - JGL Robert Pearson vs PG County Police Department (False Arrest and Detention)
  - JGL w/Prince Georges County Public School Board (Superintendent Background)
  - JGL vs Alex Medouni (Child Custody)
  - ABRA Establishments:
    - Aqua, Club U, Club 55, DC Tunnel, Dreams, Love, Cada Vez & Takoma Park Station
  - DC Jail Detainees vs DC Government Corrections (Scared Straight Program)
- Administrative Consultant and Investigation for Fraternal Order of Police (FOP) Labor Union
  - James Pressler & Patrick Senftle, PC
    - Adverse Actions, Terminations, Labor Grievances, Arbitration, and Appeals

## Professional Memberships

International Association of Chiefs of Police (IACP)  
Police Executive Research Forum (PERF)  
National Defender Investigators Association (NDIA)  
Fraternal Order of Police (FOP) Lodge #1  
Association of Retired Police Officers (AORP) Washington, DC

## Labor Union Experience

Metropolitan Police Department (1986 – 1999)

- Chief Shop Steward and Shop Steward for the FOP Labor Committee
  1. Negotiating Labor Union Contracts
  2. Equal Employment Opportunity Compliance
    - a. Sexual Harassment
    - b. Employee Discrimination
  3. Labor Union Disciplinary Advocate
    - a. Adverse Actions, Terminations, Labor Grievances, Arbitration, and Appeals
    - b. Detective Grade 1 Class Action Labor Grievance to PERB

## **Certifications and Training**

Use of Force Summit: presented by Daigle Law Group (DLG2018) (November 2018/21 hours)

- UOF Current Trends-Legal Standards for Policy Training;  
Developing Effective Use of Force Policies and Training, presented by Atty Eric Daigle (2 hours)
- De-Escalation and Mental Illness, presented by Atty Eric Daigle (1.25 hours)
- Arrest Related Death Investigations, presented by Atty Isaiah Fields (1.25 hours)
- Force Reporting and Force Investigation, presented by Atty Eric Daigle (1.25 hours)
- Cell Extractions Pre-planned Use of Force, presented by Capt. Brian Zawilinski (1.25 hours)
- Use of Force-Training, Transfer, Deployment and Court, presented by Kevin Dillon (LOCKUP) (2.25 hours)
- Self-Inflicted Video, presented by Grant Fredericks (2.5 hours)
- Tactical Operations Legal presented by Chief/Atty Michael Whalen (1.25 hours)
- Developing Use of force Training on PowerDMS, presented by Atty Eric Daigle (1.25 hours)
- Biomechanical Aspects of Use of Force Encounters presented by Jamie Borden-Force Science Instr(2.5 hours)
- Officer Involved Shooting Diferent Perspective,s presented by Atty Eric Daigle (1.25 hours)
- Administrative Investigation, presented by Capt. Brian Zawilinski (1.25 hours)

Dental Embezzlement: Investigation Meets Prosecution presented by Maryland State Dental Association  
David G. Harris CEO, Prosperident, Inc (October 2018/3 hours);

De-Escalation: Use-of-Force Legal Standards and Tactics presented by IACP (October 2018/2 hours);  
Assessing Use-of-Force Policies presented by IACP (October 2018/1 hour);  
The National Use-of-Force Data Collection presented by IACP (October 2018/1.50 hours);  
Strategic Disengagement with Persons in Crisis: A De-Escalation Policy Overview and SWAT Implementation,  
Presented by IACP (October 2018/1.50 hours);

Promoting Excellence if First-Line Supervision presented by PERF, Washington, DC (April 2018/8 hours);  
Use-of-Force: How do current trends influence Policy, Training, and Investigations,  
Presented by IACP, Philadelphia, PA (October 2017/2 hours);

Shooting Reconstruction Certification presented by Forensic Pieces, LeCanto, Florida (Aug 2017/40 hours);  
The Changing Trends of Investigations presented by PERF, Washington, DC (Aug 2017/8 hours);  
ICAT (Integrating Communications, Assessment, and Tactics) Training presented by PERF (2017/8 hours);  
Criminal Justice Act (CJA) Contract Investigators Training, presented by DC PDO (2006/20 hours);  
MPDC and FBI Homicide Training presented by MPD and FBI (1992/3 weeks);  
MPDC Training Academy (1978)

## **Conferences Attended**

2018 DLG 2018 Use of Force Conference, Uncasville, Connecticut  
2018 IACP Conference, Orlando, Florida  
2018 NDIA Conference, Annapolis, Maryland  
2017 IACP Conference, Philadelphia, Pennsylvania  
2017 ICAT (Integrating Communications, Assessment, and Tactics) Training and Implementation Meeting  
Sponsored by PERF and Camden County Police Department, Camden County, New Jersey  
2017 PERF and Major Cities Chiefs of Police (MCCP) Conference, Las Vegas, Nevada  
2017 Organization of Racing Investigators Conference, Tampa, Florida  
2015 ASIS Conference, New York, NY

## **Media Appearances**

FOX, CNN, "The Factor" Bill O'Reilly, Roger Cossack, Greta Van Susteren, Shepard Smith, Local TV 4, 5, 7, 9

## Employment

Apr 2000 – Present

Protocol Security Agency

Position: Owner/Private Investigator

Owner – Sole Proprietor

8633 Cherry Lane, Suite #1D, Laurel, Maryland 20707: (O) 202-628-6666

Licensed in Maryland, and Florida

- Civil and Criminal Defense Investigator
  1. Violent Crime Investigations
    - Murder, Sex Offenses, and Armed Assaults
  2. International and Domestic Federal Conspiracies
  3. Systematic Theft Schemes and Pattern Criminal Offenses
  4. White-Collar Criminal Offenses
- Unarmed and Armed Security Guard and Patrol Services
- Security Consultant
  1. ABC Establishments
  2. Commercial and Residential
  3. Security Personnel Training
- International Air Transport Association (IATA)/Cargo Network Services (CNS)
  1. Cargo Transport Site and Business Inspections

Apr 1999 – Nov 2002

Prince George's County Public School System

Position: Investigator/Counselor

507 Largo Road, Largo, Maryland 20772: (O) 301-499-7000

- School Safety Issues
  1. Criminal Violations
  2. Drug Interdiction
  3. Gang Interdiction
- Interaction with school administrators, teachers, and staff
- Counseling and Peer Mediation

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## Major Achievements and Commendations

- April 2018 Guest Speaker at National Defender Investigation Association (NDIA) Conference: Doing More with Less: Strategies for Effective Defense Investigations Under the Criminal Justice Act Sponsored by NDIA and The DC Public Defenders Service
- June 2016 Completed and passed requirements for the State of Florida Private Investigator Agency and Security Guard Agency licenses.
- March 2014 Member of the Metropolitan Police Department, Washington, D.C. (MPDC) “Professional Conduct and Intervention Board” that monitors and sets policy on Police Misconduct Issues, Use of Force Investigations, Disciplinary Matters, and Crisis Intervention Programs for police officers in accordance with the MPDC General and Special Orders, the contractual Labor Agreement with MPDC Fraternal Order of Police (FOP) members, Metropolitan Police Employee Assistance Program (MPEAP), and the MPDC Police Personnel Management System (PPMS).
- June 2013 Established a Security Guard and Patrol Services branch of Protocol Security Agency that is licensed, bonded and insured to conduct armed and unarmed security guard and patrol services in the State of Maryland.
- June 2013 Revived the Charles Town Racetrack Chaplaincy “Drug and Alcoholic Addiction Treatment Program” establishing AA and NA programs, counseling sessions, and support groups in coordination with the West Virginia Racing Commission (WVRC), Charles Town Horsemen’s Benevolent and Protective Association, Charles Town racetrack Management and Security, Charles Town Chaplaincy Board, and the community.
- Dec 2009 Elected to the CTHBPA Board of Directors as an Alternate Board member; then appointed as an active Board member in 2011; resigned from CTHBPA Board May 2014.
- Sept 2008 Instructed attorneys for the Office of the Public Defender for the State of Maryland in the reconstruction of crime scenes.  
Sponsored by Office of the Public Defender, Attorney Mary Jo Livingston
- June 2006 Instructed the Alcohol Beverage Regulation Association (ABRA) Board members and attending ABRA licensee management and security teams on “The Force Continuum Wheel” regarding Use of Force issues for security personnel employed to work for ABRA licensed establishments.  
Sponsored by the Law Office of Brown, Wilmot and Bagwell and ABRA.
- March 2006 Developed and instructed an Instructional Training Program for security personnel working in Alcohol Beverage Regulation Association (ABRA) establishments.  
Sponsored by the Law Office of Brown, Wilmot and Bagwell.
- March 2004 Contributed to the instruction of the Criminal Justice Act (CJA) Attorney Panel for the District of Columbia Superior Court on the Metropolitan Police Department (MPDC) General Orders, Police Investigations, and Police Procedures on crime scene search investigations and reconstruction of crime scenes.  
Sponsored by CJA Attorney Panel, Attorney Betty Ballister

- October 2003 Contributed to the instruction of the Criminal Justice Act (CJA) Attorney Panel and the District of Columbia Public Defenders Service (DCPS) Attorney Office for the District of Columbia Superior Court on Interviews and Interrogations; “The Reid Technique”.
- Sponsored by the D.C. Public Defenders Service, Attorney Anthony Matthews
- March 2003 Instructed the Criminal Justice Act (CJA) Attorneys Panel for the District of Columbia Superior Court on the Metropolitan Police Department (MPDC) General Orders and Police Procedures on police reports and report writing.
- Sponsored by the CJA Attorney Panel, Attorney Betty Ballister
- April 2000 Established a sole proprietor Private Detective Agency that is licensed, bonded and insured to conduct civil and criminal defense investigations in the State of Maryland and Washington, D.C.
- April 1997 Selected by the firm Booz-Allen & Hamilton and the Metropolitan Police Department, Washington, D.C. (MPDC) in the Group of 21 (G-21) to participate in a wholistic approach in restructuring the organizational and police operations of the MPDC. The G-21 was compromised of sworn Police Command Staff, Officers and Civilians. I was the only Detective selected to participate in the restructuring.
- July 1996 Lead Detective in the first Community Empowerment Policing (CEP) prosecution of a street crew in the District of Columbia under the direction of United States Attorney Judge Eric Holder and MPDC Fourth District Police Commander Robert C. White. The investigation and prosecution led to the arrest and conviction of 37 suspects dubbed the “Fern Street Crew” that terrorized the Shepherd Park Community in Washington, D.C.

**Civil and Criminal Defense Investigations (EEOC, Medicaid and Medicare Fraud, etc)**

- Law suits against police departments – Joseph, Greenwald and Laake (JGL)
  - Estela Jacome de Espina vs Prince George’s County, Md - CALo9-23501 (JGL)
    - Wrongful Death and Excessive Use of Force ( \$11.5 million)
  - Robert L. Peason vs Prince George’s County, Md - CALo7-02110 (JGL)
    - False Arrest and Detention (\$70K)
- Prince George’s County Public School System (PGCPSS)
  - Investigation into School Board Member 2007 (JGL)
  - Administrative Employment Background for Superintendent (JGL)

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**Post-Conviction Investigation**

The Federal Public Defender (FPD) of Washington, D.C. through panel Attorney Matthew Peed retained my services to investigate a Habeas §2255 petition filed by Anderson Straker. In 2009, Straker and five (5) co-defendants were convicted in District Court, Washington, D.C. of a 2005 international Kidnapping and Murder Conspiracy of a United States (US) citizen that occurred in Trinidad, West Indies. Straker and the five (5) co-defendants were sentenced to Life imprisonment without parole. When all filings were complete, the USAO conceded to a new trial for six (6) defendants.

United States vs. Anderson Straker, et al - 06-CR-106 JB – Kidnapping and Murder Conspiracy

*“On 2006, Anderson Straker and eleven (11) co-defendants were indicted in the District Court of Washington, D.C. for a planned kidnapping for ransom of a US Citizen who eventually died in the custody of the kidnappers. After the death of the US Citizen, his body was dismembered and packaged into two (2) containers and buried into two(2) unmarked grave sites. All the events occurred in Trinidad, West Indies. An investigation into the matter was conducted by the United States Attorney Office (USAO) and the Federal Bureau of Investigation (FBI), as well as the Trinidad And Tobago Police Service (TTPS). This was a death penalty eligible case.*

Defendant Straker’s Habeas §2255 petition claimed attorney ineffective assistance, joint venture investigation violations between the USAO and TTPS, and 4<sup>th</sup> and 5<sup>th</sup> amendment violations. An investigation that was conducted in Trinidad revealed that the petition claims had some merit. The investigation in Trinidad also revealed aspects of prosecutorial grand jury and witness misconduct; FBI misconduct on assaulting defendant Straker, advisement of rights, and a FBI Agent having intimate relations with decedant’s niece; Ineffective assistance against the trial attorney and the trial investigator for failing to investigate incidents in Trinidad and failing to have witnesses located, interviewed and available for testimony at motions and trial matters. Colusion between co-defendants and the TTPS; And finally, colusion between the USAO and a co-defendant that gave testimony against the six (6) defendants that went to trial.

The USAO conceded to a new trial for six (6) defendants.

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**Criminal Defense Investigation**

The Office of the Public Defender Anne Arundel County (OPDAAC) retained my services to investigate the criminal charges filed against Raynard Boston, reconstruct the crime scene that involed the client allegely discharging of a firearm, consult on Anne Arundel County Police Department’s (AACPD) general orders and standard operating procedures, consult on AACPD’s Police Tactics, consult on AACPD processing crime scene procedures, and reviewing, investigating and critiquing AACPD detective’s investigation.

State of Maryland vs Raynard Boston - 02-K-13-00243 – Attempted 1<sup>st</sup> Degree Murder & 1<sup>st</sup> Degree Assault

*“On 2-15-2013, Raynard Boston was a patron at a night club where a dispute arose between Mr. Boston and the night club security officer. Mr. Boston was assaulted by the security officer and the security officer was alledgedly shot with a handgun by Mr.Boston. A second subject was injured by the gun fire. All these events were captured by the night club CCTV cameras and observed by numerous witnesses. The AACPD arrived on the scene, attended to the injured victims, preserved the crime scene, investigated the crime, and processed the crime scene. Mr. Boston was devloped as a suspect and subsequently arrested and charged with Attempted 1<sup>st</sup> Degree Murder and 1<sup>st</sup> Degree Assault.”*

An AACPD Crime Scene Search Unit responded to the crime scene, processed and photographed the shooting crime scene, and collected evidence, but failed to diagram the shooting crime scene and take any measurements of the physical evidence recovered.

Our crime scene reconstruction consisted of the crime scene being diagramed, measurments taken of the collected evidence and the evidence placement, as well as reviewing the CCTV video suveillance with the statements of the witnesses and the collected evidence. The reconstruction of the crime scene revealed that the AACPD officers and their supervisor failed to properly preserve the crime scene. The AACPD Crime Scene Unit processed the crime scene after it had been contaminated by not only witnesses, but police officers as well. The State of Maryland and the AACPD based their whole case against Mr. Boston on the CCTV video surveillance recordings and identification of Mr. Boston on eye witness testimony. The reconstruction of the crime scene and revealing the AAPCD failure to properly secure and process a crime scene in violation of AACPD general orders and standard operating procedures, and a flawed investigation by AACPD detectives led to a successful defense of Mr. Boston.

A jury found Mr. Raynard Boston not guilty of Attempted 1<sup>st</sup> degree Murder and 1<sup>st</sup> Degree Assault.



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## Criminal Defense Investigation

The Law Office of M. Dennis Murphy retained my services to investigate the criminal charges filed against John Delich, reconstruct the crime scene that involved police officers' discharging their firearms, consult on Anne Arundel County Police Department's (AACPD) general orders and standard operating procedures, consult on AACPD's Police Tactics, consult on AACPD's "Use of Force" investigation involving police officers discharging their service issue firearm, and reviewing, investigating and critiquing AACPD detective's investigation.

State of Maryland vs John C. Delich – 02- K-15-CR-0000 - 1<sup>st</sup> Degree Assault on police officers.

*“On March 15<sup>th</sup>, 2015, John Delich was accused of pointing and firing a loaded semi-automatic firearm at three (3) Anne Arundel County Police Department (AACPD) officers, who had responded to Mr. Delich’s home for a “man with a gun” call for service. As four (4) officers surrounded Mr. Delich’s house to investigate the “man with a gun” call for service, Mr. Delich opened and exited his garage door to investigate the unknown intruders (officers) on his property armed with a loaded semi-automatic handgun. Three (3) officers confronted Mr. Delich at the garage door entrance and an exchange of gunfire was reported by the police officers. Mr. Delich suffered a gunshot injury as he closed his garage door for cover and a barricade situation was initiated by the police. None of the police officer’s suffered any injuries. Mr. Delich was eventually arrested and charged with three (3) counts of 1<sup>st</sup> Degree Assault on a police officer.”*

The AACPD conducted a "Use of Force" investigation into the discharging of the three (3) officers' service issued firearms and the gunshot wounding of a suspect. An AACPD Crime Scene Search Unit processed and photographed the shooting scene and collected evidence. The three (3) officers' actions in the "Use of Force" investigation was ruled "Justified" by the AACPD.

The crime scene reconstruction consisted of the crime scene being diagramed, measurements taken of the bullet entry and exit holes to include trajectory angles by using the photographs taken at the scene by AACPD and actual physical inspection of the gunshots destruction evidence. Inspection of Mr. Delich's garage, garage door (open and closing), trajectory investigation of Mr. Delich's garage, interior and exterior of his house from bullets striking the property and walls to include his vehicle inside the garage, as well as the trajectory evidence of the bullet that struck Mr. Delich.

The reconstruction of the crime scene revealed Mr. Delich was armed with a loaded semi-automatic handgun when he opened and exited his garage; that Mr. Delich had not fired his handgun at any police officer at the scene, as reported by the officers; that Mr. Delich was fired upon first by one of the officers and Mr. Delich fled back into his garage; Mr. Delich ran to the back of the garage and closed the garage door; as the garage door closed, two (2) other police officers fired their service issued firearms at Mr. Delich; the two (2) officers reported that Mr. Delich had pointed his handgun at the officers in a threatening manner before they (officers) fired upon Mr. Delich; physical evidence revealed that Mr. Delich suffered a single gunshot injury to his lower leg from the gunfire of a police officer while in the back of the garage (blood evidence) after he had started closing the garage door; trajectory evidence revealed that the two (2) officers could not have fired at Mr. Delich before the garage door was closing; the trajectory angles of the officers' firing their service firearms was more consistent with the garage door closing as the officers were firing their service firearms; the physical evidence at the crime scene did not corroborate the officers version of events and that the two (2) officers testimony was not factual.

A judge found Mr. John C. Delich not guilty of all 1<sup>st</sup> Degree Assault charges on the police officers.

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## Criminal Defense Investigation

The Office of the Public Defender Anne Arundel County (OPDAAC) retained my services to investigate the criminal charges filed against Calvin Johnson, reconstruct the crime scene that involved the police officer's discharging of his firearm, consult on Anne Arundel County Police Department's (AACPD) general orders and standard operating procedures, consult on AACPD's Police Tactics, consult on "Use of Force" investigation involving a police officer discharging his service issue firearm, and reviewing, investigating and critiquing AACPD detective's investigation.

State of Maryland vs Calvin Johnson - 02-K-06-002570 - 1<sup>st</sup> Degree Assault on a police officer

*"On 11-3-2006, Calvin Johnson, while operating his motor vehicle, was accused of attempting to run over a uniformed Anne Arundel County police officer. The police officer had attempted to execute a traffic stop on Mr. Johnson. The police officer exited his patrol vehicle and reported that Mr. Johnson aimed his vehicle at the police officer and drove directly towards the officer, pinning the officer against his patrol vehicle. This action by Mr. Johnson caused the officer to open fire on Mr. Johnson from a stationary position next to his patrol vehicle. Mr. Johnson suffered a gunshot injury and his vehicle was struck numerous times from the gunfire. The officer was not injured in the offense. Mr. Johnson was subsequently arrested and charged with 1<sup>st</sup> Degree Assault on a police officer."*

The AACPD conducted a "Use of Force" investigation into the discharging of the officer's service issued firearm and the gunshot wounding of a suspect. An AACPD Crime Scene Search Unit processed and photographed the shooting scene, and collected evidence, but failed to diagram the shooting crime scene and take any measurements of the physical evidence recovered (shell casings) as it was not required by AACPD general orders nor their standard operating procedures. The officer's actions in the "Use of Force" investigation was ruled "Justified" by the Anne Arundel County Police Department.

The crime scene reconstruction consisted of the crime scene being diagrammed, measurements taken of the shell casing placements by using the photographs taken at the scene by AACPD, the test firing of AACPD's service issue firearm to determine a shell casing ejection pattern of their firearms, inspection of Mr. Johnson's vehicle, trajectory investigation of Mr. Johnson's vehicle (front hood and windshield) from bullets striking the vehicle and trajectory evidence of the bullet that struck Mr. Johnson after the bullet had struck the vehicle's steering wheel.

The reconstruction of the crime scene revealed that the officer was not in a stationary position when he fired his service weapon; diagramming the shell casing placements and the test fire of AACPD's service issue firearm for determining shell casing ejections revealed that the officer was walking towards the moving vehicle, into the street, and away from his patrol unit; the trajectory evidence in the moving vehicle's hood and windshield revealed that Mr. Johnson was driving his vehicle in the direction of the officer, but away from the officer and not towards the officer's patrol vehicle; the steering wheel trajectory evidence revealed that the moving vehicle had to be turned to the right to sustain that damage and strike Mr. Johnson, meaning the moving vehicle's steering wheel was turned away from the officer and was headed away from the direction of the officer when this damage was sustained.

A jury found Mr. Calvin Johnson not guilty of 1<sup>st</sup> Degree Assault charges on a police officer.

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## Civil Investigation

The Law Office of Joseph, Greenwald and Laake, Attorney Timothy Maloney retained my services to investigate a civil complaint to be filed on behalf of Cheye Calvo, Mayor of Berwyn Heights, Maryland, against the Prince George's County of Maryland Sheriff's Department, reconstruct the crime scene that involved sheriff deputies' discharging their service issued firearms killing the Mayor's two (2) labradors dogs, securing the two (2) labradors for their respective necropsy, consult on Prince George's County Sheriff Department's (PGCSD) general orders and standard operating procedures, consult on on PGCSD's SWAT Tactics, consult on PGCSD's "Use of Force" investigation involving the sheriff deputies discharging their service issue firearm, and reviewing, investigating and critiquing PGCSD detective's investigation.

*"On 7-29-2008, the PGCSD's SWAT team responded to the home of Mayor Cheye Calvo of Berwyn Heights, Maryland conducting a drug interdiction investigation and serving a search warrant on his home, not realizing the home was that of the Mayor of Berwyn Heights. The Sheriff's Swat team forcibly entered the home without knocking and announcing themselves and immediately fatally shot the two (2) labradors and just missed striking the Mayor's mother-in-law who was in the line of fire. PGCSD, after the forced entry and shooting of the dogs, realized that Mayor Calvo had nothing to do with the drug intradiction investigation and was not charged."*

The PGCSD conducted a "Use of Force" investigation into the discharging of the deputie's service issued firearm and the killing of the labradors, as the two (2) labradors reportedly charged at the deputies in a threatening manner. A PGCSD Crime Scene Search Unit processed and photographed the shooting scene and collected evidence. The deputie's actions in the "Use of Force" investigation was ruled "Justified" by the PGCSD.

After the crime scene was released by PGCSD, a reconstruction of the crime scene consisted of recovering two (2) additional semi-automatic shell casings and one (1) bullet round fragment that PGCSD failed to recover. A necropsy of the two (2) labradors was conducted and bullets recovered from each of the labrador to determine trajectory evidence of the fired ammunition and the respective placement of the labradors as they were shot. The crime scene was diagramed, measurments taken of the shell casings and bullet fragment placements recovered. These recovered items of evidence were turned over to PGCSD for further consideration in their investigation into the "Use of Force".

The reconstruction of the crime scene and collection of additional evidence revealed that two (2) deputies, not one (1) deputy, fired their service issued firearm. The necropsy bullet evidence recovered from the labradors and the trajectory evidence revealed that one labrador was shot as he layed at the foot of the kitchen entrance and the second labrador was shot as he was running away from the deputies after the forcibile entry. Neither labrador dog was charging the deputies as reported in the "Use of Force" investigation. The mother-in-law was between the labradors as they were being shot and she received no gunshot injury from this shooting. The reconstrution of the crime scene and collection of additional evidence corobborated the testimony of Mayor Cheye Calvo and his mother-in-law, which completely contradicted the testimony of the PGCSD deputies.

The lawsuit was settled for an undisclosed amount of money with new regulations and policies to be implemented by the PGCSD into the investigation of application and execution of search warrants and "Use of Force" standards.

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