

1 A. Yes.

2 Q. What did you get a degree in?

3 A. My bachelor's degree was in criminal justice
4 and criminology. My master's was in sports psychology,
5 as I indicated to you.

6 Q. That's at Florida State?

7 A. Yes.

8 Q. And you're working on your doctorate?

9 A. Now on my third year of Ph.D.

10 Q. At?

11 A. FSU.

12 Q. You haven't written any reports in this case?

13 A. I have not, no.

14 Q. Okay. You are getting paid?

15 A. Yes.

16 Q. Right. Not just charity?

17 A. No. I hope not, yes. It has happened.

18 Q. What do you charge an hour?

19 A. I charge \$200 an hour.

20 Q. That's what you're charging Mr. Bross?

21 MR. BROSS: And hopefully the state attorney
22 for this deposition.

23 BY MR. REID:

24 Q. Do you know how many hours -- how much have
25 you gotten paid so far?

1 A. I took a retainer of ten hours and so I've
2 gotten a \$2,000 check. That is it.

3 Q. Have you burned through that retainer yet?

4 A. Yes. Well, I'm close to it. I'm close to
5 burning through it.

6 Q. So approximately you earned about \$2,000?

7 A. Yes.

8 Q. Do you -- what do you anticipate -- how many
9 more hours, do you have any idea?

10 A. I really don't know. It depends if he wants
11 me to write a report. That's when we start putting a
12 lot of time in, obviously, because I have to start doing
13 citations and cross-references and going to the library
14 and all that stuff.

15 I understand the case well enough to testify
16 to it, but if it's going to be a structured report, then
17 I can put in a bunch of hours. I usually cap myself to
18 about 15 so that there is no --

19 Q. Fifteen hours per report?

20 A. -- so there in no surprises at the end of the
21 day.

22 Q. All right. Well, and in looking at this case,
23 let's talk about what you reviewed. Who have you talked
24 to, what people?

25 A. Just the attorney. I have read everything.

1 Q. I'll get to that in a second. But for the
2 people, you haven't spoken with Mr. Morrison?

3 A. Just about -- that's who I was talking to on
4 the phone out there. So the answer is, yes, very
5 briefly.

6 Q. Only today?

7 A. Only today.

8 Q. So the only -- you haven't talked to anyone
9 else beside Mr. Bross?

10 A. I typically don't. It's my method to look at
11 things more objectively and not to be swayed by later
12 opinions or later ideas or the unfortunate bias that can
13 happen when you actually like somebody or dislike
14 somebody. So everything that I've looked at at this
15 point has been in relationship to what's been
16 documented.

17 Q. Well, let's talk about that. So tell me which
18 reports you've reviewed?

19 A. I saw the police reports.

20 Q. Do you know which one?

21 A. Well, the original one by the arresting
22 officer. I saw a couple narratives that were attached
23 to that. I don't remember precisely --

24 Q. Do you keep a list of what reports you
25 reviewed?

1 A. For the most part. I looked at -- I've
2 listened to statements given to FDLE by some of
3 the agents. I've looked at a variety of depositions, a
4 variety of written statements or transcribed statement.

5 Q. Can you be more specific than that? Are you
6 looking at something on your phone?

7 A. This is my digital file. So I've seen a
8 variety of pictures of Ms. Mays. I don't know when
9 these were taken. That's the one thing I wasn't able to
10 figure out. The injuries look to me as if they're old.
11 If they were taken at night -- which I think they were
12 because it looks like they're outdoors and at night. I
13 can't imagine going back weeks later. These are the
14 images I saw of her. I don't know how old those
15 injuries are, but they are scabbed over.

16 I saw -- or I listened to an audio file of
17 Randolph Nowell; an audio file of William Kimmie; a
18 interview of Officer Kelly.

19 I've read a deposition from Steven Aldrich;
20 from James Andrews; Matthew Armstrong.

21 Q. What did you read of his?

22 A. His deposition. And I also read the statement
23 during the interview that was taken by FDLE. I've
24 listened to a statement from Corporal Armstrong. I have
25 read a deposition by Lauren Duncan; a deposition by

1 Rodney Erdman; a deposition by Heather Gingery.

2 I have looked at a few images of what appear
3 to be the arresting officers or the two officers that
4 are mentioned in the report, primarily Armstrong and
5 Kelly. I'm assuming that's who it is. Even though the
6 files are listed as IMG0011 without names, I'm making
7 this inference that that's who they would be, knowing
8 how the process works.

9 I've listened to an interview with -- I can't
10 tell who because my phone -- okay. Interview with Leah
11 Mays; interview with Michael Morrison. I've read a
12 deposition by Dale Kelly. I've read the statement
13 interview by Dale Kelly; a deposition by Tim Craft.
14 I've looked at a few other images of movies, if you
15 will, of the environment, the actual area.

16 I've had an interview with -- or read a
17 written interview of Leah Mays; a deposition from Todd
18 McBride; FDP from Josh Mead. I'm assuming that's
19 probably a deposition. I don't recall off the top of my
20 head; a deposition from Jeff Miller; deposition from
21 Scott Peterka; a call audio of the shooting incident.

22 Q. Is that the 9-1-1?

23 A. Yeah. And that's what I have.

24 Q. Nothing -- you listed everything you reviewed?

25 A. Yes, with the exception of some things I saw

1 this morning --

2 Q. What are those?

3 A. -- that were in his folder that had mostly to
4 do with the police. I was looking for things like
5 property receipts, for instance, and scanned through a
6 folder and looked at a few items. Frankly, at this
7 moment, I couldn't tell you exactly what I looked at.

8 Q. To formulate your opinion, what you just read,
9 that was exactly what you reviewed, correct, what you
10 just read?

11 A. Yes.

12 Q. All right. Have you -- so you worked your
13 whole career up in Tallahassee, correct?

14 A. I travel world-wide. My home base is
15 Tallahassee.

16 Q. Have you ever worked for Holly Hill Police
17 Department?

18 A. I have not.

19 Q. Have you worked for Volusia County Sheriff's
20 Office?

21 A. I testified in grand jury on behalf of the
22 Volusia County Sheriff's Office during the Todd Raible
23 case, you might remember.

24 Q. Not as a police officer?

25 A. Not as a police officer.

1 Q. Or anything besides, I guess -- I don't know
2 what you're -- I mean, not to sound rude, I don't know
3 what you're talking about. I wasn't involved with that
4 case. I guess you were an expert in a case for Volusia
5 County Sheriff's Office?

6 A. Yes.

7 Q. That's been your only interaction with them?

8 A. Again, I've done a lot of training around the
9 state. I've trained a lot of the Volusia County guys as
10 well as Daytona PD and perhaps Holly Hill and so on.

11 Q. Have you ever worked for Daytona Beach Police
12 Department?

13 A. No.

14 Q. Okay. Have you ever reviewed Holly Hill
15 Police Department's policies and procedures?

16 A. No, but that's what I will do immediately,
17 depending on how far this thing goes.

18 Q. All right. And you're not -- at this point
19 you're not familiar with Holly Hill Police Department's
20 policy and procedure?

21 A. I am not.

22 Q. Have you ever reviewed or are you familiar
23 with Volusia County Sheriff's Office's policies and
24 procedures?

25 A. Yes. Again, I had a full dose of that during

1 the last case that I testified in sourced by your
2 office.

3 Q. You've read their entire policies and police
4 procedures?

5 A. Not the entire thing. I looked at use of
6 force and defense tactics, the SWAT operations, things
7 that were not dissimilar to what we're dealing with in
8 this case.

9 Q. How about for Daytona, have you reviewed
10 Daytona's policies and procedures, Daytona Beach Police
11 Department?

12 A. I work very closely with Daytona Beach Police
13 Department because many of them I've trained. Over the
14 years I can't specifically give you a citation, but they
15 have sent me policy before to review, certainly in
16 relationship to use of force and defensive tactics;
17 sometime the officers themselves, if they found
18 themselves in hot water and looking for some free
19 advice.

20 Q. Would you say you're familiar with that?

21 A. I am.

22 Q. With Daytona Beach policy?

23 A. Probably -- again, probably not all the
24 policy. For instance, I might not know what they do
25 with police K9s. But if it's use of force and defensive

1 tactics, I'm pretty familiar with it.

2 Q. With Daytona specifically?

3 A. I would think so, yeah. It's been a long time
4 since I looked at it and perhaps there has been some
5 changes, but I was very tied into their policy because I
6 was coming here every year doing training for them.

7 Q. How long ago was that?

8 A. Probably been three or four years the last
9 time I was here.

10 Q. You were training for them?

11 A. At the academy. I was at the academy, but I
12 think my class consisted of 95 percent Daytona Beach.

13 Q. All right. And are you familiar with a use of
14 force continuum?

15 A. I am.

16 Q. Tell me about that.

17 A. What do you want to know?

18 Q. Well, do you agree that it talks about the
19 appropriate response to use of deadly force?

20 A. It does. So let me tell you the political
21 side of it, and then I'll tell you more specifically.
22 The use of force continuum is no longer being used by
23 the Florida Department of Law Enforcement as a training
24 tool for law enforcement officers; however, agencies do
25 continue to use it. I think it's a good idea.

1 So it is no longer found in Criminal Justice
2 Standards and Training Commission. They do have one.
3 If you call them, they can send you a copy of one, but
4 it's just not out front. It's sort of buried back with
5 the "nice to have" rather than "need to have" file.

6 In terms of how it works, if you want to know
7 my understanding of that, it is basically a system that
8 is divided into resistance and response. That level of
9 resistance is compared with an appropriate or acceptable
10 level of response based on the concept of
11 proportionality. And the theoretical underpinning of
12 the force continuum is that there are times when you
13 will escalate in relationship to your perceived
14 observations, and there are times when you will
15 deescalated in relationship to your perceived
16 observations.

17 And as a result, the force continuum can
18 therefore be sort of laid out in different fashions.
19 Florida has also used what's called a linear continuum.
20 Other agencies and other states have used circular
21 continuums. I've seen block continuums. That's
22 actually what FLETC uses, the Federal Law Enforcement
23 Training Center. So there are various versions of it,
24 but in terms of its philosophical importance, they are
25 all identical.

1 Q. Would you agree that every agency has their
2 own policies and procedures?

3 A. Yes.

4 Q. And every agency has different policies and
5 procedures when it comes to the amount of force they can
6 use under what situation?

7 A. Well, I hope they're not too different. There
8 is variance, it's true, but the variance is considered
9 somewhat of a national standard at this point. I can go
10 from here to California to Texas to Ohio, and I can
11 pretty much tell you without looking at their force
12 continuum, the levels of force that are considered
13 proportional in terms of resistance and response.

14 Q. What is the goal of this force continuum?

15 A. There are several goals in the force
16 continuum. Obviously, safety should be the first goal,
17 for the law enforcement officer to make sure that they
18 are safe. The second goal is to avoid excessive force.
19 And I think if you were to ask me a strictly academic
20 question about this, I will tell you that's why we have
21 a force continuum.

22 Since the development of some case law
23 requirements -- generally speaking, Tennessee versus
24 Garner, Graham versus Connor -- the court has imposed on
25 law enforcement an objective reasonableness standard,

1 which is a Fourth Amendment standard rather than the
2 previous Eighth Amendment standard in which we judged
3 force.

4 It was after the ruling of Graham versus
5 Conner that various professionals in law enforcement
6 felt they needed to -- now that they had some guidance
7 in what kind of force could be used, they needed to
8 objectify that and create a model in which new people or
9 perhaps older people in the business could look at this
10 model and say that in and of itself is objective. Even
11 if I don't agree with it, it is still objectively
12 reasonable.

13 Q. Would you say -- it's accurate to say that the
14 goal is to use -- to get the maximum amount of control
15 with the minimum amount of force?

16 A. No. As a matter of fact, that's been one of
17 the problems with the use of force continuum is we have
18 people calling for minimum force. The goal is to be
19 reasonable. And sometimes if you, for instance, shoot
20 somebody, you may have reflected on that later --
21 because everyone else will -- and decide that that level
22 of force perhaps could have not been used in light of
23 hindsight.

24 But it doesn't invalidate the decision to
25 shoot if the officer is operating off of limited

1 information and working reasonably to respond to a
2 threat of death or great bodily harm.

3 Q. Well, let me get into more of the facts of
4 this case. What part of this case -- I mean, you
5 haven't written a report. I honestly don't know what
6 you're planning to testify about. What areas of this
7 case would you be testifying about?

8 A. So much of it. I think this is just -- the
9 whole case is bad. First part I would be testifying
10 about, if I'm asked to -- and, of course, I answer
11 questions, what I'm able to testify about is better
12 said -- would be the procedures used by the
13 investigating agency, Daytona Beach.

14 Q. What about the procedures?

15 A. The decision to, first of all, make an arrest
16 without a warrant.

17 Q. Of who?

18 A. Of Mr. Morrison.

19 Q. At the end of the case?

20 A. No. I think that was the reason for going
21 over there. That's what prompted, I think, the visit to
22 the house at 1:30 in the morning. There was no
23 compelling reason to do that, obviously. Even if he
24 felt he had probable cause, then you get a warrant. As
25 you know, all arrests are considered assumed to be

1 invalid without a warrant.

2 And then you kind of work backwards from there
3 as to why you needed to arrest somebody with a
4 warrantless arrest based on perhaps exigencies. There
5 were none in this case.

6 Q. Why do you say that was an improper decision?

7 A. Well, it ended -- it cascaded into why we're
8 here. This case could have been better handled from the
9 very beginning. I don't think another officer
10 probably -- a reasonable officer would have followed
11 that same thought pattern in trying to arrest Mr.
12 Morrison that night based on a single story from what I
13 understand was an intoxicated witness; actually, a
14 second intoxicated witness also that later changed his
15 story. The prudent thing to do would have been to get a
16 warrant. That would have actually changed the entire
17 dynamics to what later happens. That's not what they
18 did.

19 The second problem you have is that you cart
20 the alleged victim in a domestic violence to the alleged
21 perpetrator, which in law enforcement, that's precisely
22 opposite of what we do. We try to separate them and
23 keep them separated. In this case we have an officer
24 pulling the victim, or at least what he perhaps believes
25 is the victim at that point, over to the perpetrator.

1 Bad decision, shouldn't do it. Highly not recommended
2 in police training and probably more than likely in
3 their policy as well. I'm pretty sure it's going to say
4 separate the combatants in a domestic violence. That's
5 pretty much how it's listed out. That's not what
6 happens in this particular case.

7 You want to ask another question?

8 Q. Yeah, and I'll let you go into it some more.
9 So, say, focusing on what you just talked about, is it
10 your opinion that it wasn't the best decision, or did
11 they do something that you believe is illegal?

12 A. Well, it wasn't the best decision, but I think
13 they also did something that was illegal.

14 Q. What do you think they did that was illegal?

15 A. I think they trespassed on the property, first
16 of all. I don't think they have probable cause to be in
17 the back of this guy's house. They certainly couldn't
18 go into the house and make an arrest without a warrant.
19 I think they were hoping he would come out and volunteer
20 himself.

21 You also have the jurisdictional problem.
22 You're no longer in the confines of your municipality.
23 You're sort of relying, I guess, on the Holly Hill
24 police officer to project that power to him. It doesn't
25 exactly work that way, but that's what I assume the

1 officer was trying to do is to get a confederate in this
2 to be able to make the arrest based on what happened in
3 Daytona Beach.

4 Q. Are you familiar with any -- I'm sorry. Are
5 you familiar with any jurisdiction agreements between
6 Holly Hill and Daytona?

7 A. No. And there may be some. Generally what
8 you do is call the sheriff. It's usually a county
9 issue, it's not a municipality issue. If you're going
10 to be going into another municipality within the county,
11 you alert the sheriff's department. It's fairly well
12 understood that the boundaries of the municipality
13 and -- the boundary of the municipality when it comes to
14 legal authority, unless it's fresh pursuit. That's not
15 this case. We don't have a fresh pursuit.

16 Q. But they did call Holly Hill to get Holly Hill
17 involved. It was Holly Hill's jurisdiction, correct?

18 A. Yes.

19 Q. So what's wrong with a Daytona officer going
20 with a Holly Hill police officer?

21 A. It's provocative. I'm curious what the
22 officer was trying to accomplish.

23 Q. I'm talking about just -- you said, you know,
24 it was improper for Daytona to go into Holly Hill.
25 Jurisdictionally, what was wrong with that?

1 A. It wasn't improper for Daytona to go into
2 Holly Hill. Daytona can probably go wherever they
3 wanted to. When it gets to the issue of Constitutional
4 rights, there are strong rules and laws and policies in
5 place that forbid you from jumping jurisdiction for the
6 purpose of making an arrest.

7 Look, if you wanted to drive over there and
8 investigate the crime and try to build probable cause or
9 get Mr. Morrison's story, nobody has any problem with
10 that. But he says he goes over there to make an arrest.
11 This is where we start getting into some fuzzy issues
12 that are going to make for a fascinating civil case, I'm
13 sure.

14 Q. What's are your -- tell me more about your
15 issues?

16 A. After what --

17 Q. This part of -- is your only issue, you're
18 saying there wasn't probable cause?

19 A. Okay. So probable cause, as you know, is a
20 question for the jury, not for me. But I think a jury
21 will agree what they have is extraordinarily sketchy.
22 We have to bear in mind the end of the story, that we
23 end up shooting the guy inside his own house.

24 So you work backwards from there, and what you
25 have is a police officer now who has then become an

1 accomplice in a crime, which I've never seen before, by
2 the way. I've never seen a facilitation of a criminal
3 event by law enforcement that was so obvious and
4 blatant.

5 I don't believe that these officers -- I'm
6 sure these officers didn't know that Ms. Mays lived
7 there, even though she said she did. She didn't live
8 there, it turns out. She's got her own apartment.
9 Oddly, they pick her up from in front of her apartment
10 and take her to Mr. Morrison's house based on her word
11 that she lives there, and they decide to watch her
12 commit not only trespass but also, at the very least,
13 criminal mischief and perhaps burglary; and they
14 facilitate this.

15 Q. Let's say for the sake of argument the police
16 believe she lives at this residence?

17 A. Okay.

18 Q. What did -- would you believe the police did
19 criminally wrong?

20 A. I just told you. They helped her facilitate
21 in several crimes.

22 Q. Say they -- can you break it -- is it legal
23 to -- if I'm locked out of my own house, I can break a
24 window to get into my own house, correct?

25 A. I suppose that's the gamble the police were

1 taking.

2 Q. Well, that's true?

3 A. Sure, you can break your own stuff. They
4 don't know that it's hers.

5 Q. But if they believe it's hers?

6 A. Why would they?

7 Q. Just saying for the sake of argument, if the
8 police believed she lives in this house, it would be
9 legal for her to break into her own house?

10 A. You want a hypothetical or --

11 Q. Hypothetical.

12 A. The hypothetical is if they know that she
13 lives there and have no reason to not believe that, she
14 can break whatever she wants to break. I would submit
15 to you they probably should still stop her. It's 1:30
16 in the morning. That's the other problem in this case.
17 I mean, you've got neighbors, it's supposed to be quiet.
18 Why are we doing this in the middle of the night?

19 We believe, by the way, that he's in there.
20 She says he's in there. They're inviting her to engage
21 what is allegedly a domestic fight between a guy who is
22 in his house, perhaps armed, at 1:30 in the morning.
23 It's bad all the way around. I mean, every decision
24 they made is bad all the way around.

25 Q. I'm trying to separate bad in hindsight from

1 what you're saying is illegal.

2 A. Well, the police aren't on trial. I'm not
3 trying to convict them. I want to make that very clear.

4 Q. Let me give you another hypothetical. Say --
5 again, back to my -- you know, my house. I lock myself
6 out. I'm prying a window open to try to get into my
7 house at 1:00 in the morning.

8 If the police officer sees me doing this and
9 stops, and I tell them, look, this is my house, do they
10 have any legal reason to stop me from doing it?

11 A. Sure. I mean, now we have an investigation on
12 our hands. We get your driver's license; we find out
13 what the address is on it; we start quizzing you about
14 the particular area, seeing how bona fide you appear to
15 be. I don't think any of that happened.

16 Q. Okay. All right. Well, back to -- I mean, we
17 agree your specialty is on use of force, correct?

18 A. Use of force and defensive tactics, yeah.

19 Q. As far as, you know, burglary, trespasses,
20 domestic violence, your only experience just has been
21 what any other patrol officer would have?

22 A. I don't know how to take that comment.

23 Q. I don't mean it as a negative insult. When I
24 say patrol officer, I don't mean to say a patrol --
25 anything negative as a patrol officer, but you have no

1 certificates, you haven't taught classes, you don't have
2 any other expertise in those type of crimes beside just
3 from day-to-day as a police officer?

4 A. Well, if you operationalize the concept of
5 expert, I fit that category in all of those areas,
6 having done this as many years as I have. I know more
7 than the normal person, the ordinary person about these
8 particular areas.

9 Q. I guess what I'm getting at, you wouldn't know
10 any more than any other police officer that has been a
11 police officer for 20 years?

12 A. I don't know. I was a field training officer
13 for many years. I dealt with policy issues. I'm not
14 sure a lot of officers do that. I had to understand
15 very well because it was my job to indoctrinate new
16 students of law enforcement into the profession. So I
17 was a student of policy for most of my career, and
18 certainly the ten full years I was there.

19 I became a student of policy as a privateer as
20 well because I write training manuals. And I have to
21 write to, for instance, issues of policy involving the
22 Fourth Amendment. That's where your arrests begin. If
23 you don't understand concepts of Fourth Amendment, you
24 don't understand how to make an arrest properly. I'll
25 submit to you I'm an expert in those areas as well.

1 Q. What policies have you written in regards to
2 the Fourth Amendment and these other issues?

3 A. Everything. Making an arrest is a Fourth
4 Amendment issue, as I have told you. I've dealt with
5 policies involving police pursuits, I've dealt with
6 policies involving K9s. All of those have Fourth
7 Amendment implications.

8 Q. Specifically, what agencies did you write
9 these policy?

10 A. Tallahassee Police Department. I've been
11 sourced actually by some international firms. I have
12 done some review, believe it or not, in Mexico City.
13 I've done some in Germany.

14 Q. And you've done policies that are not related
15 to use of force?

16 A. They're all related to use of force. That's
17 pretty much my expertise.

18 Q. That's what I'm getting at. All your
19 expertise goes into this use of force?

20 A. Which is a Fourth Amendment issue.

21 Q. So I guess maybe I'm beating a dead horse. I
22 guess there is no specialized training you have in
23 regard to -- because in this case you're saying that the
24 police shouldn't have taken this woman to the house?

25 A. Right.

1 Q. You know, that has nothing do with use of
2 force at this point for her to go into the house?

3 A. It's police procedure. I do have certificates
4 in domestic violence. I think we have to go through
5 that almost every year. You can calculate the years of
6 me understanding domestic violence and how to separate
7 individuals and not bring them together, and how to
8 prevent tragic events from happening between two people
9 who are feuding.

10 Q. I guess, I mean -- and I'm just going back in
11 a circle. If I go to Daytona Beach Police Department,
12 if I go to Holly Hill, Volusia County, any police
13 department over here, there are officers that have been
14 around for 30 years. You know, they've handled hundreds
15 of domestic violences, hundreds of trespasses, hundreds
16 of burglaries. But you haven't had any -- you wouldn't
17 be any more specialized in those fields than they would,
18 than a patrol officer that's been around for 20 years?

19 MR. BROSS: Object to the form of the
20 question.

21 THE WITNESS: I suppose it's up to a judge to
22 decide my expertise. I immerse myself in the
23 nuances of police work. I can't say every police
24 officer does that. As I indicated to you earlier,
25 one of the reasons I left full-time policing was

1 for the purpose of doing that, immerse myself in
2 the nuances of law enforcement on a larger scale.

3 Most police officers, the great majority of
4 the police officers do a job. They police. They
5 go to work at 8:00 in the morning and go home at
6 6:00 at night, and whatever comes their way, they
7 try to manage it and deal with.

8 That was not my life. My life was certainly
9 more directed towards creating the schemas in which
10 police operate rather than focusing all my time on
11 the grunt work of patrolling a neighborhood in
12 Tallahassee.

13 BY MR. REID:

14 Q. So besides just, you know, caring more and
15 getting better experience than a police officer that's
16 been around for 20 years, you don't have any other
17 specialized training in the field we're talking about
18 with different particular types of crimes, probable
19 cause, that type of thing, than any other officer would
20 have through their normal training and experience?

21 MR. BROSS: Object to the form of the
22 question.

23 THE WITNESS: It's such an odd question
24 because there is no analysis of what the mean of
25 officer understanding is. I can't tell you where I

1 fit the curve.

2 BY MR. REID:

3 Q. Let me ask you this: You don't have any
4 certification in probable cause, domestic violence,
5 trespass, burglary, correct?

6 MR. BROSS: Object to the form of the
7 question.

8 THE WITNESS: I've been trained in all of
9 those. I'm not sure there is a certification. I
10 don't believe there actually is.

11 BY MR. REID:

12 Q. Have you gone to any class training that
13 wouldn't just be a normal academy or just, you know,
14 your 30 hours every five years or whatever it is?

15 A. There is mandatory retraining, as I told you.
16 Domestic violence is high on the list. It's almost
17 always there; child investigation.

18 Q. That's with all officers?

19 A. That's right, but when you're in it 29 years
20 and you're in it five years, you will assume the guy
21 with the 29 years of doing that would certainly know
22 more than the guy with five years, even though the
23 classes are perhaps the same.

24 Q. Then we're getting back to, if I go to Holly
25 Hill and find someone that's been around 30 years, they