

General Civil Case Filing Information Form (Non-Domestic)

Court
 Superior
 State

County CHATHAM

Date Filed 10/01/2015
 MM-DD-YYYY

Docket # CV15-0878-AB

Plaintiff(s)

DELATORRE, PETER
 Last First Middle I. Suffix Prefix Maiden

DELATORRE, MICHAEL
 Last First Middle I. Suffix Prefix Maiden

VON LOEWENFELDT, ROBERT
 Last First Middle I. Suffix Prefix Maiden

HARRIS, LAWRENCE
 Last First Middle I. Suffix Prefix Maiden

Defendant(s)

LOVETT, WILLIE C.
 Last First Middle I. Suffix Prefix Maiden

LIAKAKIS, PETE
 Last First Middle I. Suffix Prefix Maiden

ABOLT, RUSSELL
 Last First Middle I. Suffix Prefix Maiden

BROWN, MICHAEL
 Last First Middle I. Suffix Prefix Maiden

No. of Plaintiffs 4

No. of Defendants 15

Plaintiff/Petitioner's Attorney **Pro Se**

CLAIBORNE, WILLIAM R.
 Last First Middle I. Suffix

Bar # 126363

Check Primary Type (Check only ONE)

- Contract/Account
- Wills/Estate
- Real Property
- Dispossession/Distress
- Personal Property
- Equity
- Habeas Corpus
- Appeals, Reviews
- Post Judgement Garnishment, Attachment, or Other Relief
- Non-Domestic Contempt
- Tort (If tort, fill in right column)
- Other General Civil Specify _____

**If Tort is Case Type:
 (Check no more than TWO)**

- Auto Accident
- Premises Liability
- Medical Malpractice
- Other Professional Negligence
- Product Liability
- Other Specify Georgia RICO
 OCGA 16-4-1 et seq.

Are Punitive Damages Pleaded? Yes No

I hereby certify that the documents in this filing (including attachments and exhibits) satisfy the requirements for redaction of personal or confidential information in O.C.G.A. 9-11-7.1

IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
Defendants.)

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Civil Action Number: SPCV15- 0879 -AB

JURY TRIAL REQUESTED

COMPLAINT

COME NOW the above-named Plaintiffs, by and through counsel, and file this, their Complaint, against Willie C. Lovett (former Chief of the Savannah-Chatham Metropolitan Police Department (“SCMPD”)), Pete Liakakis (former Chatham County Commission Chairman), Russell Abolt (former County Manager of Chatham County, Georgia), Michael Brown (former City Manager of Savannah, Georgia), Juliette Tolbert (Assistant Chief of Police, SCMPD), Malik Khaalis (former Sergeant with SCMPD and the Chatham-Savannah Counter-Narcotics Team (CNT)), Willet Williams (former Star Corporal, SCMPD), Floyd Sawyer (former Officer, Savannah-Chatham Metropolitan Police Department), James Williams (former Corrections Officer, Coastal State Prison), Rodney Gerido (former Sergeant, SCMPD), Cedric Phillips (former Captain, SCMPD), Eric Henderson (former Sergeant with SCMPD), Greg Ramsey (Lieutenant, Savannah-Chatham Metropolitan Police Department), Henry “Hank” Wiley, III (former head of Internal Affairs, SCMPD), and Andre Oliver (former Lieutenant, SCMPD), respectfully showing the Court the following:

INTRODUCTION

1.

This civil action, brought to recover damages under the Georgia Racketeer Influenced and Corrupt Organizations Act (O.C.G.A. § 16-14-1 *et seq.*) (hereinafter “Georgia RICO” or “RICO”), arises from the takeover of an otherwise legitimate organization, the Savannah-Chatham Metropolitan Police Department (“SCMPD”), and infiltration of the Counter Narcotics Team (“CNT”), by corrupt officers, who in turn used their positions both in the Department, and while assigned to CNT, to serve their own illicit purposes.

2.

These corrupt officers, led by the Chief of Police, engaged in “unlawful conduct, and the illegal use of force, fraud, and corruption” to control a network of “highly sophisticated, diversified, and widespread activity” including “such illegal endeavors as...the importation and distribution of narcotics and other dangerous drugs.”¹

3.

Chief Lovett, with the assistance of his co-conspirators, seized control of the Department in order to channel their criminal activities through an institution whose primary purpose was to *disrupt* criminal activity.

4.

In the process, these racketeers subverted, corrupted, and undermined the legitimacy of good police work. They compromised the safety and welfare of both their fellow officers and the public they were sworn to protect. This Complaint shows how four honorable police officers, the Plaintiffs herein, were threatened, transferred, and ultimately forced out of the Department by corrupt officers, in order to prevent the Plaintiffs from rooting out the criminal activity of the corrupt enterprise.

5.

SCMPD is a joint enterprise sponsored by Chatham County, Georgia and the City of Savannah, Georgia. Each respective government utilizes a manager as the chief individual responsible for overseeing all operations of the County or the City. As is shown in this

¹ Statement of Findings and Purpose, Organized Crime Control Act of 1970, Pub. L. No. 91-452, 84 Stat. 922, 922-23 (1970). Georgia’s RICO statute is modeled on the Federal statute. *Wylie v. Denton*, 323 Ga. App. 161, 166, n. 7, 746 S.E.2d 689, 694 (2013). See also, *Fitzgerald v. Chrysler Corp.*, 116 F.3d 225, 227 (7th Cir. 1997) (POSNER, J.) (describing the “prototypical RICO case” as one in which “a person bent on criminal activity seizes control of a previously legitimate firm and uses the firm’s resources, contacts, facilities, and appearance of legitimacy to perpetrate more, and less easily discovered, criminal acts than he could do...without channeling his criminal activities through the enterprise that he has taken over”).

Complaint, rather than effectively, honestly, and ethically overseeing the operations of the SCMPD, the managers of both the County and the City were key participants in the furtherance of the criminal activity of the corrupt enterprise. Each manager had opportunities to end the corruption, but rather than take the steps to end the corruption, the managers aided, abetted, and actively supported the corruption of SCMPD and CNT.

JURISDICTION AND VENUE

6.

This Court has jurisdiction pursuant to the Georgia Civil Practice Act, including O.C.G.A. §§ 9-10-91 and 9-10-30. This Court also has jurisdiction over this action pursuant to O.C.G.A. § 15-6-8(1), and Ga. Const. art. VI, § 4, ¶ 1.

7.

Venue is proper under the Georgia Civil Practice Act, O.C.G.A. § 9-10-30, *et seq.*

8.

This action is timely filed within the applicable statutes of limitation.

PARTIES

9.

Plaintiffs are former police officers who were, at all times material to this Complaint, employed by the Savannah Chatham Metropolitan Police Department (hereinafter “SCMPD”).

10.

Plaintiff Peter Delatorre is a citizen of the state of Georgia, Bryan County, and submits himself to the jurisdiction to this Court. Peter Delatorre held the rank of Advanced Police Officer in the Savannah-Chatham Metropolitan Police Department until he was constructively discharged in November 2012.

11.

Plaintiff Michael Delatorre is a citizen of the state of Georgia, Chatham County, and submits himself to the jurisdiction to this Court. Michael Delatorre held the rank of Advanced Police Officer in the Savannah-Chatham Metropolitan Police Department until he was constructively discharged in November 2013.

12.

Plaintiff Robert von Loewenfeldt is a citizen of the state of South Carolina, Horry County, and submits himself to the jurisdiction to this Court. Von Loewenfeldt was hired by the Chatham County Police Department and served in the Savannah-Chatham Metropolitan Police Department at the rank of Sergeant until he was constructively discharged in March 2013.

13.

Plaintiff Lawrence Harris is a citizen of the state of Georgia, Effingham County, and submits himself to the jurisdiction to this Court. Plaintiff Harris held the rank of Advanced Police Officer in the Savannah-Chatham Metropolitan Police Department until he was constructively discharged on January 5, 2011.

14.

Defendant Willie Clinton Lovett is a citizen of Georgia who is temporarily residing in a federal prison in West Virginia. Defendant Lovett can be served with process c/o Inmate Register No.: 18961-021, USP Hazelton, U.S. Penitentiary, 1640 Sky View Drive, Bruceton Mills, WV 26525.

15.

Defendant Lovett became Chief of Police in April 2010 and held that position until he abruptly retired on September 27, 2013. At all times material to this Complaint, Defendant

Lovett was an employee, agent, and representative of the Department whose duties and responsibilities were to represent the interests of the Department, the City of Savannah, and Chatham County. At all material times, Defendant Lovett appeared to be acting within the scope of his apparent authority.

16.

Defendant Pete Liakakis is an individual residing at 17 East Perry Street, Savannah, GA 31401. Defendant Liakakis served as Chairman of the Chatham County Commission from January 2005 until January 2013. At all material times, Defendant Liakakis appeared to be acting within the scope of his apparent authority.

17.

Defendant Russell Abolt is an individual residing at 110 Olde Towne Road, Savannah, GA 31410. Defendant Abolt was the County Manager for Chatham County, Georgia from in or about 1988 until May 2014. At all material times, Defendant Abolt appeared to be acting within the scope of his apparent authority.

18.

Defendant Michael Brown is an individual residing at 1 Sir Lancelot Court, Savannah, GA 31405. Defendant Brown was the City Manager for the City of Savannah from in or about 1995 until May 2010. At all material times, Defendant Brown appeared to be acting within the scope of his apparent authority.

19.

Defendant Tolbert is an individual residing at 63 Crestwood Drive, Savannah, GA 31405. Defendant Tolbert is presently the Assistant Chief of Police for the SCMPD. At all material times, Defendant Tolbert appeared to be acting within the scope of her apparent authority.

20.

Defendant Khaalis is an individual residing at 5 Fontenot Court, Savannah, GA 31405 who previously was employed as a Sergeant with SCMPD. At all material times, Defendant Khaalis appeared to be acting within the scope of his apparent authority.

21.

Defendant Willet Williams is an individual residing at 1521 Pendleton Street, Savannah, GA 31405 who previously was employed as a Star Corporal with SCMPD. At all material times, Defendant Williams appeared to be acting within the scope of his apparent authority.

22.

Defendant Floyd Sawyer is an individual residing at 740 South Main Street, Apt. 42, Hinesville, Georgia 31313 who previously was employed as an Officer with SCMPD. At all material times, Defendant Sawyer appeared to be acting within the scope of his apparent authority.

23.

Defendant James Williams is an individual residing at 1463 East 40th Street, Savannah, GA 31404 who previously was employed as a corrections officer at Coastal State Prison. At all material times, Defendant James Williams appeared to be acting within the scope of his apparent authority.

24.

Defendant Gerido is an individual residing at 115 Marsh Edge Lane, Savannah, GA 31419 who previously was employed as a Sergeant with SCMPD. At all material times, Defendant Gerido appeared to be acting within the scope of his apparent authority.

25.

Defendant Cedric Phillips is an individual residing at 291 Rathlin Road, Richmond Hill, GA 31324 who previously was employed as a Captain with SCMPD. At all material times, Defendant Phillips appeared to be acting within the scope of his apparent authority.

26.

Defendant Eric Henderson is an individual residing at 3812 Renwick Village Drive, Savannah, GA 31410 who previously was employed as a Sergeant with SCMPD. At all material times, Defendant Henderson appeared to be acting within the scope of his apparent authority.

27.

Defendant Greg Ramsey is an individual residing at 112 Saint Andrews Way, Savannah, GA 31410. Defendant Ramsey is currently a Lieutenant at SCMPD. At all material times, Defendant Ramsey appeared to be acting within the scope of his apparent authority.

28.

Defendant Henry "Hank" Wiley, III is an individual residing at 7 Mainhouse Lane, Savannah, GA 31419 who previously was employed as a Captain with SCMPD. At all material times, Defendant Wiley appeared to be acting within the scope of this apparent authority.

29.

Defendant Andre Oliver was an individual who resided at 117 Mallard Drive, Savannah, GA 31415. Defendant Oliver previously was as a Lieutenant with SCMPD. At all material times, Defendant Oliver appeared to be acting within the scope of this apparent authority.

30.

On June 24, 2014, Defendant Oliver took his own life. Plaintiffs have searched, but can find no evidence that Defendant Oliver's estate has been probated. Therefore, the Plaintiffs

reserve the right to amend this complaint to substitute the Estate of Andre Oliver as a defendant upon the creation of said estate either by the heirs of Defendant Oliver or by the Plaintiffs. For the sake of clarity and completeness, the allegations against Defendant Oliver have been included in this Complaint. The claims stated against Defendant Oliver herein are the claims which will be asserted against the estate upon its creation.

FACTUAL ALLEGATIONS

RICO Culpable Person(s)

31.

While the precise number of racketeering participants and co-conspirators has fluctuated over the past decade, all Defendants named above have participated in the criminal activity of the corrupt enterprise, to wit: SCMPD, at times material to this action.

Willie C. Lovett

32.

Defendant Willie Lovett joined the Savannah Police Department in August 1973. On or about 1981, Lovett was promoted to Sergeant. In 1998, Lovett was promoted to the rank of Major. In 2005, Lovett became Assistant Chief. He served in this capacity, and at times as Acting Chief, until being named Chief of Police in 2010.

33.

In 2010, Lovett was one of ten (10) to fifteen (15) applicants for the position of Chief of Police.

34.

The following individuals comprised the SCMPD Public Policy Committee (PPC) who voted in 2010 to hire Defendant Lovett as Chief of Police: Defendant Abolt, Defendant Brown, Defendant Liakakis, and Savannah Mayor Otis Johnson.

35.

On October 27, 2010, Chief Lovett changed the Promotional Process pursuant to SCMPD General Order # PNL-003. A copy of said General Order is attached hereto as Exhibit "A" and incorporated herein.

36.

In effecting this change, Chief Lovett began receiving all the files of all applicants for promotion within SCMPD including those who passed the assessment and those who had not.

37.

As Chief of Police, Defendant Lovett revised and lowered the "passing score" of the assessment each time it was administered. Lovett made these changes to allow himself to promote individuals who otherwise would not have been eligible for promotion.

38.

Defendant Lovett ensured that he personally had authority over all promotional decisions within the department.

39.

Rather than making decisions about promotions based upon the best interest of the public, Defendant Lovett predicated those decisions upon personal loyalty to him. During a deposition in a lawsuit, Defendant Lovett was asked what questions he asked when interviewing candidates

for the position of Major. Defendant Lovett only recalled asking two questions, one of which was: “On a scale of 1-to-10, how loyal are you?” or words to that effect.

40.

On August 5, 2014, a federal grand jury returned an indictment against Defendant Lovett, for extorting cash payments in exchange for protection of an illegal gambling business. A copy of said indictment is attached hereto as Exhibit “B” and incorporated herein.

41.

On November 21, 2014, Defendant Lovett was convicted by a jury in the Federal Court for the Southern District of Georgia for the following offenses: conspiracy to obstruct the enforcement of state criminal laws, two counts of extortion, two counts of making false statements, and commercial gambling.

Pete Liakakis

42.

Defendant Pete Liakakis served as Chatham County Commission Chairman from 2005 until 2013. During that time, Defendant Lovett twice was named Interim Chief of Police and was sworn in as Chief of Police in April 2010.

43.

On at least four occasions in 2009 and 2010, former SCMPD Major Mark Gerbino met with Defendant Liakakis at Olympia Café on Savannah’s Bay Street. During these meetings, Gerbino informed Liakakis that Defendant Lovett was engaged in corrupt activities. Despite actual notice of corruption and his sworn responsibility to the citizens of Chatham County, Liakakis took no action to remove Lovett from his position.

44.

In 2010, Defendant Liakakis served on the committee that voted to make Defendant Lovett police chief. Rather than acting in the best interest of the public, Liakakis, with knowledge of the ongoing corruption of Lovett, took the substantial step to aid and assist in the ongoing corruption by promoting Lovett to police chief.

Russell Abolt

45.

Russell Abolt served as Chatham County Manager from in or about 1988 until May 2014. During that time, Lovett rose through the ranks of SCMPD, was twice named Interim Chief of Police and was sworn in as Chief of Police in April 2010. During his tenure as County Manager, Abolt ignored repeated warnings that Lovett was corrupt and actively lobbied have Lovett named permanent Chief of Police.

46.

On or about October 2009, a group of high-ranking SCMPD officers, including Lieutenant Michael Wilson and Training Director Gary Taylor, requested to meet with Defendant Abolt. During this meeting, Abolt was warned against naming Lovett Chief of Police. Abolt ignored that warning and continued to advocate that Lovett be named Chief of Police.

47.

In 2010, Defendant Abolt served on the committee that voted to make Defendant Lovett police chief. Rather than acting in the best interest of the public, Defendant Abolt, with knowledge of the ongoing corruption of Defendant Lovett, took the substantial step to aid and assist in the ongoing corruption by promoting Lovett to police chief.

48.

On or about May 2010, Major Mark Gerbino met with Defendant Abolt in Abolt's office to warn him that Lovett was corrupt. Gerbino gave Abolt details of Lovett's corruption.

49.

Within minutes of leaving Defendant Abolt's office, Gerbino received a phone call from Defendant Lovett. Lovett demanded to know why Gerbino had just gone to Abolt's office and told Abolt that Lovett was corrupt.

50.

Gerbino immediately returned to Defendant Abolt's office and confronted Abolt about calling Defendant Lovett. Abolt did not deny that he had divulged to Lovett that Gerbino had said Lovett was corrupt.

51.

Despite actual notice of corruption and his responsibility to the citizens of Chatham County, Defendant Abolt took no action to remove Defendant Lovett from his position. Rather, Abolt took the substantial step to aid and assist in the ongoing corruption by alerting Defendant Lovett of the meeting with Gerbino and providing Lovett with the information Gerbino had divulged.

52.

On September 24, 2010, CNT Director Roy Harris sent a memorandum and supplemental report to Defendant Abolt. This memo and report contained considerable investigative detail regarding the activities of Defendants Khaalis and Willet Williams.

53.

Rather than act in the best interest of the public by intervening to stop the ongoing corruption, Defendant Abolt, took the substantial step to aid and assist in the ongoing corruption by alerting Defendant Lovett of the existence of the Roy Harris Memo and providing Defendant Lovett a copy of said memo.

Michael Brown

54.

Michael Brown served as Savannah City Manager from in or about 1995 to May 2010. During his tenure as City Manager, Brown received specific information and multiple warnings that Lovett was corrupt.

55.

Michael Berkow was police chief at SCMPD from November 2006 to October 2009. During that time, Defendant Lovett served as Assistant Chief. On several occasions Berkow requested permission to fire Lovett due to suspicion of corruption. However, Brown told Berkow that elected officials in the City of Savannah protected Lovett, and Brown refused to allow Berkow to fire Lovett.

56.

In 2010, Defendant Brown served on the committee that voted to make Defendant Lovett police chief. Rather than acting in the best interest of the public, Brown, with knowledge of the ongoing corruption of Defendant Lovett, took the substantial step to aid and assist in the ongoing corruption by promoting Lovett to police chief.

57.

At some time in early 2010, Major Mark Gerbino met with Defendant Brown and specifically informed him that Lovett was corrupt. Brown told Gerbino that Defendant Lovett was protected by elected officials and that Lovett could not be fired. Despite actual notice of corruption and his responsibility to the citizens of Savannah, Defendant Brown took no action to remove Lovett from his position.

Malik Khaalis

58.

Defendant Malik Khaalis first joined SCMPD on January 10, 2000.

59.

As early as 2004, Khaalis was assigned to the Counter Narcotics Team (CNT), an interagency effort of SCMPD, the Chatham County Sheriff's Office, the Garden City Police Department, the Bloomingdale Police Department, the Pooler Police Department, the Port Wentworth Police Department, the Tybee Island Police Department, the Thunderbolt Police Department, the Chatham County Board of Education Police Department, and the Richmond Hill Police Department.

60.

Defendant Khaalis' position at CNT was as a Narcotics Agent.

61.

As alleged more fully below, Defendant Khaalis used his position as a Narcotics Agent to protect individuals who participated in the trafficking of illegal drugs.

62.

Defendant Khaalis personally benefitted from the assistance he provided to drug traffickers.

63.

On January 22, 2014, an indictment was issued against Defendant Khaalis in Chatham County Superior Court for false statements and violation of oath by public officer. Said indictment relates directly to the criminal activity of the corrupt enterprise at SCMPD. A copy of said indictment is attached hereto as Exhibit "C" and incorporated herein.

James Williams

64.

Defendant James Williams worked as a Corrections Officer at Coastal State Prison in Savannah, Georgia, from June 1999 through September 2007. James Williams worked as a uniformed security officer for the Georgia Ports Authority from September 4, 2007 through July 25, 2008. Shortly thereafter, James Williams then returned to his position at Coastal State Prison and worked there until on or about June 2010.

65.

In June 2008, Plaintiff Peter Delatorre, working in his capacity as a CNT agent, arrested a man at Victory Drive and Abercorn Street for possessing crack cocaine. That man agreed to work for CNT as a confidential informant.

66.

The CNT confidential informant was taken to Coastal State Prison, where the informant's former drug supplier, Percy "Piggy" June Anderson was already incarcerated. See Exhibit "D," CNT Supplemental Report No. 081203021, attached hereto and incorporated herein.

67.

While incarcerated at Coastal State Prison, the confidential informant learned that Defendant James Williams, a guard at the prison, was working with Anderson to smuggle multiple kilograms of cocaine into the prison by placing the drugs in the bottom of cans of paint.

68.

The confidential informant identified Defendant James Williams as having sold multiple ounces of cocaine to Anderson on two occasions during the first half of 2008 while the confidential informant was present. These purchases took place at James Williams' home, located at 1463 East 40th Street in Savannah, Georgia. The confidential informant said he and Anderson were escorted home by corrupt SCMPD officers driving marked police vehicles after purchasing the drugs.

69.

CNT agents were given two important reasons to believe the confidential informant was truthful:

- 1) The confidential informant was given two polygraph tests wherein he was questioned on the information he gave CNT agents about police corruption. The tests showed the informant to be truthful.
- 2) A SCMPD police report shows that on July 28, 2005, Anderson was driving Defendant James Williams' vehicle when he was pulled over and arrested for possession of cocaine and marijuana with intent to distribute. James Williams was a passenger in the vehicle at the time of the arrest. Defendant Willet Williams arrived at the scene of the arrest, and James Williams was allowed to leave.

70.

In January 2009, CNT Agent Mark Lupus obtained cell phone records for Defendant James Williams. These records were dated from October 8, 2008 through November 28, 2008 and showed that eight (8) convicted drug dealers had connected to James Williams' cell phone (912-272-6461) during that time. Said convicted drug dealers were Kenneth Emerson-Smith, Shawn March, Dwon Moultrie, Jawyan Pringle, Derrick Brown, David Hudson, Dijon McCall, and Freddie Pope.

71.

Defendant James Williams listed known and convicted drug dealers as his contacts on Coastal State Prison employment forms. According to information in the Chatham County Sheriff's Office's Phoenix Electronic Records Management System, known and convicted drug dealer Kevin Wade provided James Williams' cell phone number during an encounter with police.

72.

The CNT confidential informant told Plaintiff Peter Delatorre that Defendant James Williams had a brother who was an SCMPD officer. Defendant James Williams' brother is Defendant Willet Williams, a former SCMPD Star Corporal.

Willet Williams

73.

Defendant Willet Williams used his position at SCMPD, including access to marked police units, to participate in drug trafficking operations in Chatham County for his own benefit.

74.

Defendant Willet Williams first joined Savannah Police Department in 1991. Willet Williams was eventually promoted to Star Corporal, a rank equivalent to that of a Sergeant. As a star corporal, Defendant Willet Williams had supervisory responsibilities within the department.

75.

As detailed above, a CNT confidential informant identified Defendant Willet Williams as providing police escorts in marked SCMPD units to Anderson and the CNT informant on two occasions during the first half of 2008. These escorts were provided after Anderson purchased multiple ounces of cocaine at Defendant James Williams' home.

76.

The confidential informant identified Defendant Willet Williams after seeing Williams in a January 2009 news clip on WTOG-TV. The CNT informant also identified Willet Williams from a photo lineup provided by CNT agents.

77.

The confidential informant identified Defendant Willet Williams as a member of a criminal organization that included multiple SCMPD officers and individuals within local government that was "selling high grade (sic) marijuana, cocaine, and ecstasy pills in large amounts."

78.

The same confidential informant said the criminal organization was comprised of SCMPD officers who had not been arrested during the "Savannah 11" investigation.

79.

The “Savannah 11” investigation was conducted by the FBI from 1994 to 1997 and resulted in 11 Savannah Police Department officers convicted on federal corruption, drug and gun charges. See Exhibit “E” attached hereto, *A Sad Day For Law Enforcement*, Savannah Morning News, Sept. 13, 1997.

80.

The confidential informant told CNT agents that corrupt officers inside the Savannah Police Department were not charged during the “Savannah 11” investigation. The informant said these officers had been promoted in the department and now held positions of power.

Floyd Sawyer

81.

From a photo lineup of randomly selected officers, the same CNT confidential informant on or about February 2009 identified Defendant Floyd Sawyer, who was a SCMPD officer at the time, as being present in the marked police vehicle with Defendant Willet Williams during the second of the two 2008 drug buys at Defendant James Williams’ home.

82.

On or about June 2011, Defendant Sawyer was fired from SCMPD for appearing in a rap video. See Exhibit “F”, *Officer Fired For Appearing In Rap Video*, WTOG News, July 1, 2011.

83.

In that video, Defendant Sawyer is seen in a ski mask, slamming a man against his SCMPD squad car with its flashing lights on, then taking the man’s money from his pocket. Throughout the video, for a song entitled “You don’t want this life,” rappers are seen performing

in front of Sawyer's squad car. See <https://www.youtube.com/watch?v=e1bo7oykxk>, retrieved September 30, 2015.

84.

The video was discovered by CNT Agent Todd Desautels of the Chatham County Sheriff's Department, sometime in January or February 2010 as Desautels was investigating a narcotics trafficking organization. The prime targets of that organization were Hezekiah Murdock and Josh Varner.

85.

CNT agents experienced several problems investigating the Murdock/Varner drug network, as Varner seemed to be alerted every time CNT gained a court order to monitor his phones.

86.

Defendant Khaalis showed a special interest in targets associated with the Murdock/Varner investigation, repeatedly approaching CNT's intelligence agents Don Wood and Cameron Kovach, and civilian CNT employee Nancy Wheless, requesting information on the investigation, in violation of CNT protocol, as Khaalis was not the primary case agent on the investigation.

87.

On May 11, 2010, CNT executed arrests on multiple members of the Murdock/Varner drug organization. During these arrests, Khaalis began grabbing suspects' cell phones and searching the phones for information. He was repeatedly told to stop touching the phones but refused. See Exhibit "D"

88.

On July 13, 2011, a federal grand jury indicted Defendant Sawyer for violation of 18 U.S.C. § 1951 (Extortion Under Official Right), 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Crime of Violence), 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute), 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime), and 18 U.S.C. § 1001 (False Statements to Federal Agents). A copy of said indictment is attached hereto as Exhibit “G” and incorporated herein.

89.

According to the indictment, on or about May 22, 2010, Defendant Sawyer “in his capacity as an SCMPD Officer, obtained and/or attempted to obtain purported Oxycontin pills and a cell phone from an individual with that individual’s consent, which was induced by the wrongful use of threatened force, violence, fear, and under the cover of official right.”

90.

On January 20, 2012, Sawyer pleaded guilty to the extortion count and was sentenced to federal prison.

Rodney Gerido

91.

Defendant Rodney Gerido worked for SCMPD from 1994 until on or about July 2011. From at least 2004 until December 1, 2010, Gerido was assigned to CNT.

92.

On April 16, 2009, while assigned to CNT, toll records obtained by the United States Drug Enforcement Administration (“DEA”) show Defendant Gerido and Defendant Willet Williams were in contact by telephone six times between the hours of 5:16 p.m. and 5:42 p.m., as

CNT agents performed surveillance on Willet Williams' brother, Defendant James Williams, who was suspected of corruption and drug trafficking.

93.

In January 2010, Defendant Khaalis began attempting to obtain information on a woman who had known associations with Defendant Gerido, local drug dealers, and a target of a major CNT investigation.

Juliette Tolbert

94.

Defendant Juliette Tolbert, in her role as an SCMPD Major, assisted Defendant Lovett in intimidating and punishing Plaintiffs Peter Delatorre, Michael Delatorre, and Lawrence Harris in retaliation for investigating corruption, and to influence and/or intimidate those Plaintiffs into silence about the corruption they uncovered.

95.

Defendant Tolbert imperiled the physical safety and emotional well being of Plaintiffs Peter Delatorre, Michael Delatorre and Lawrence Harris by refusing to take action when these Plaintiffs met with her on or about October 2010.

96.

These plaintiffs explained the details of their investigation into Defendants James Williams, Willet Williams, Khaalis, and Gerido. These Plaintiffs told Defendant Tolbert they feared for their lives if they had to work alongside armed officers whom they knew to be corrupt and had reported as being corrupt.

97.

In addition, in her role as an SCMPD Major, Defendant Tolbert assisted Defendant Lovett in intimidating and punishing Plaintiff von Loewenfeldt in retaliation for investigating corruption and to influence and/or intimidate Plaintiff von Loewenfeldt into silence about the corruption he uncovered.

98.

Further, Tolbert failed to take any action in 2010 after she admitted to Plaintiff von Loewenfeldt that she knew Defendant Lovett's actions against von Loewenfeldt were unfair, unethical, and illegal.

99.

In November 2013, Plaintiff Michael Delatorre attended an exit interview with Tolbert before leaving the department. During that meeting, Tolbert told Michael Delatorre that she knew that Lovett's actions as police chief were "wrong." But she said she felt she could do nothing about Lovett's bad acts while they were occurring.

Cedric Phillips

100.

Defendant Phillips was hired by the Savannah Police Department September 17, 1991. He was suspended from the police department for two days on January 19, 1993 for untruthfulness. He received a written reprimand December 2, 1995 for failing to appear in court. He was suspended from the police department for two days on April 10, 1997 for failing to locate parties involved in an automobile accident, locate witnesses to the accident, examine or record vehicle damage, record accident information, exchange information among parties to the accident, and check for parties drivers' licenses and insurance.

101.

Censures ceased being recorded in Phillips' Internal Affairs file after Lovett was promoted to SCMPD Major in December 1998.

102.

On September 1, 2008, Dean Fagerstrom, who was then head of SCMPD Internal Affairs, sent an email to Internal Affairs employee James Dale and to Defendant Oliver. Fagerstrom wrote, "The below incident occurred in 2006 and all documents were removed. Please assign a number to this incident for record-keeping purposes, thanks."

103.

Attached to the email is a City of Savannah Disciplinary Action Log which describes Phillips violating "SCMPD Rule and Regulation GO# ADM-004, Section I, General Rules of Conduct, Paragraph A Conduct Unbecoming, Number 2 (h) and Paragraph C, Respect, and Paragraph H, Truthfulness, and Paragraph K, Divulging Information." According to the Disciplinary Action Log, Phillips made disrespectful physical gestures toward a female subordinate officer and then lied about it. He received a written reprimand.

104.

Below a description of the policy violation, the Disciplinary Log reads, "Removed from file on 11/28/06 with instructions by Charles Hall and Assistant Chief Lovett." See Exhibit "H," attached hereto and incorporated herein by reference.

105.

In February 2012, Lovett promoted Phillips to SCMPD Captain. This happened weeks after Phillips committed simple battery on a citizen, while acting under color of law. The citizen had refused to unlock the door at a fitness center on Victory Drive for Phillips, who wanted to

exercise but didn't have his key. Phillips responded by telling the citizen he was a police officer and shoving the citizen.

106.

In February 2013, Lovett assigned Phillips as commander of SCMPD's newly formed drug unit. Phillips was the sole officer in that unit. As SCMPD drug squad commander, Phillips commanded only himself until he resigned "not in good standing" January 24, 2014. Phillips resigned during an SCMPD Internal Affairs investigation that was launched after Lovett abruptly retired September 27, 2013.

107.

In Defendant Lovett's November 2014 corruption trial in Federal Court for the Southern District of Georgia, prosecutors described Cedric Phillips as Lovett's "crony," his "henchman."

108.

In a recording from an FBI submitted as evidence in Lovett's trial, the then-police chief can be heard reassuring Randall "Red" Roach, the owner and operator of an illegal gambling outfit that help is on the way. Roach called Lovett during the May 2013 W.W. Law Festival for help with an irate man who called 911 after losing money to Roach's illegal "Razzle Dazzle" gambling game.

109.

That irate man was an FBI informant, sent in to prove that illegal gambling was going on and to show, by calling 911, that Roach's illegal activities were protected by SCMPD. In the FBI phone recording, Lovett is heard reassuring Roach. "I've got Captain [Cedric] Phillips on his way out there.... He'll get there shortly." Phillips arrived. Despite obvious evidence of illegal gambling, no one was arrested.

110.

From January 1, 2005 until Plaintiff von Loewenfeldt was constructively discharged in March 2013, von Loewenfeldt vocally questioned the actions of Defendant Cedric Phillips. The actions of Defendant Phillips were against department policy and were in furtherance of a criminal enterprise.

111.

Defendant Phillips' actions included:

- 1) Sitting in unmarked vehicles with his lights off, in precincts to which he was not assigned during duty hours; and
- 2) Arriving at crime scenes in precincts to which he was not assigned to interfere with those investigations.

112.

During one 2012 encounter, Plaintiff von Loewenfeldt asked Defendant Phillips why Phillips was being promoted to Lieutenant despite recently shoving a civilian, unprovoked and acting under color of law, when the citizen refused to open the door to a locked Victory Drive fitness center so that Phillips could exercise. Phillips reply to von Loewenfeldt was, "I've got it like that."

113.

On or about September 1, 2010, Defendant Phillips began making inquiries about the CNT investigation into Defendant Khaalis' corruption, telling former SCMPD Detective Darryl Fullmer that CNT agents were, "trying to accuse Khaalis of things." Phillips told Fullmer that rumors were spreading in SCMPD that Plaintiffs Michael and Peter Delatorre had botched a drug investigation and were trying to blame Khaalis for their failure.

Eric Henderson

114.

Defendant Eric Henderson was an officer assigned to SCMPD Tactical Reaction and Prevention Unit (“TRAP”). He was, among other duties, responsible for managing the TRAP vehicle fleet.

115.

On information and belief, Defendant Henderson used unmarked TRAP vehicles to distribute multiple ounces of powder and crack cocaine on Savannah’s Westside and to protect drug dealers on Savannah’s Westside from arrest.

116.

During early 2011, Plaintiff Michael Delatorre was assigned to TRAP. Michael Delatorre was assisting Detective Steven Kohles. Kohles had developed a confidential informant – a retired military member who volunteered to be an informant for SCMPD because he wanted to remove drugs from his neighborhood so that he would know his family would be safe living there.

117.

Plaintiff Michael Delatorre, Kohles, and SCMPD Officer Luis Molina took this confidential informant to make his first controlled drug buy on a Friday evening in early 2011. The confidential informant seemed eager to help and joked with the officers as they drove to the rear of the old Sam’s Club at 3609 Ogeechee Road to make arrangements for the buy. Defendant Henderson was waiting at the rear of the building when Michael Delatorre, Kohles, Molina, and the confidential informant pulled up.

118.

The confidential informant's demeanor changed completely when he saw Defendant Henderson. He did not follow officers' instructions and did not successfully purchase illegal drugs during the operation.

119.

After the failed operation, Michael Delatorre, Kohles, and Molina drove the confidential informant home. Michael Delatorre asked him what happened. The informant replied that Henderson was a major drug dealer on Savannah's Westside. The informant gave dates, locations and times he'd seen Henderson make drug sales, along with descriptions of the vehicles Henderson was driving at the time.

120.

Several of the vehicles the informant described were unmarked TRAP vehicles. Henderson had unrestricted access to these vehicles. This access was granted because Henderson had technical support responsibilities within the TRAP unit.

121.

Before reaching the informant's home, Michael Delatorre informed his immediate supervisor, Sgt. Cameron Kovach, to report what the informant told him. Kovach instructed Michael Delatorre to take the information to CNT. After returning the informant to his home, Michael Delatorre immediately drove to CNT headquarters and met with CNT Director Everett Reagan.

122.

Upon hearing what the informant had told Michael Delatorre, Reagan said he would not investigate the informant's claims. Reagan told Michael Delatorre that he would not to do so

because political friction with Lovett, the result of investigating corrupt SCMPD officers, led Reagan's predecessor, Roy Harris, to resign his post.

123.

Roy Harris testified during Defendant Khaalis' August 2015 criminal trial that he resigned because Lovett "gutted" CNT in late 2010, in the wake of the corruption investigation into Malik Khaalis, Willet Williams, and James Williams. Roy Harris testified that Lovett removed experienced, ethical SCMPD officers – including Plaintiffs Michael Delatorre, Peter Delatorre, and Lawrence Harris – from CNT and replaced these officers with Lovett's "stooges."

124.

Roy Harris testified that CNT had been built into a first-class agency. "It appeared to me that Chief Lovett was willing to destroy that to get back at me because he was mad at me for investigating his officers without his knowledge," Roy Harris testified. "I turned in my resignation and the bleeding stopped. No one else was pulled out of CNT."

Greg Ramsey

125.

Defendant Greg Ramsey is a Lieutenant with SCMPD who has been employed by the Savannah Police Department, and later SCMPD, since at least 1989, before city and county police departments merged.

126.

As alleged more fully below, Defendant Ramsey sought to cover up an investigation into criminal activity by Defendant Eric Henderson that was conducted by Plaintiff von Loewenfeldt.

Henry "Hank" Wiley, III

127.

In order to manipulate and control the Internal Affairs investigation into Defendants Willet Williams and Khaalis, Defendant Lovett installed Defendant Hank Wiley as head of Internal Affairs in June 2010. Wiley was known to be an officer who was loyal to Lovett and participated in Lovett's corruption.

128.

On November 16, 2010, Defendant Lovett ordered Defendant Wiley to prepare Internal Affairs reports clearing Defendants Willet Williams and Khaalis of any allegations wrongdoing. Wiley took a substantial step to assist in the furtherance of the criminal conspiracy by preparing the requested reports despite clear and convincing evidence that Williams and Khaalis violated SCMPD policy. See Exhibit "I," the MDBI report, attached hereto and incorporated herein.

129.

Defendant Lovett ordered Defendant Wiley to include in Defendant Khaalis' Internal Affairs report that the Savannah City Attorney's Office had reviewed the report and found no evidence of illegal activity by Khaalis.

130.

Defendant Wiley included the statement in the report, but said statement was false and known to be false by both Defendant Lovett and Wiley. Neither Wiley nor Lovett had any contact with the City Attorney's Office. No one from the City Attorney's office had reviewed Khaalis' Internal Affairs file at the time, and no one from the City Attorney's office cleared Khaalis of wrongdoing.

Andre Oliver

131.

Under Defendant Wiley's tenure as Internal Affairs commander, Internal Affairs Investigator Defendant Andre Oliver twice called Plaintiffs Michael Delatorre and Peter Delatorre to Internal Affairs and questioned about their investigation into Defendants Willet Williams and Khaalis. These interviews took place on or about June 2010 and on or about February 2011. In each of these interviews, Defendant Oliver berated Plaintiffs Michael and Peter Delatorre for investigating Defendants Willet Williams and Khaalis.

132.

On January 4, 2011 Defendant Oliver launched an Internal Affairs investigation into Plaintiff Harris for his role in the investigation of Defendant Willet Williams and Defendant Khaalis. During a January 4, 2011 interview, Oliver berated Plaintiff Harris for calling Lovett "dirty and corrupt." As a result of this Internal Affairs investigation, Plaintiff Harris was constructively fired January 5, 2011.

The Enterprise

133.

Savannah-Chatham Metropolitan Police Department (elsewhere in this Complaint, "SCMPD"), was created in 2003 by vote of the Chatham County Commission and City Council of Savannah. Joint operations of the merged departments began on January 1, 2005. SCMPD is a governmental entity and constitutes an "enterprise" as that term is defined in O.C.G.A. § 16-14-3(6).

134.

Defendants' shared purpose for gaining control of the enterprise was to exploit a public service for private gain. Defendants have engaged in an open and ongoing pattern of violation of state laws during the last five years, by using the resources, facilities, and imprimatur of law enforcement to further their own criminal goals.

Pattern of Racketeering Activity

135.

Plaintiffs reallege and incorporate by reference herein the allegations set forth in the paragraphs above and below, as if fully restated herein.

136.

Defendants engaged in an ongoing pattern of racketeering activity as defined by O.C.G.A. 16-14-3(8), by repeatedly protecting criminal activity and by thwarting investigative efforts by honest police officers. This activity constitutes a pattern because it consists of two or more acts, which occurred over a significant period of time, that is longer than two years, but with each predicate act occurring less than four years apart.

Pen Registers Evidence Drug Involvement

137.

CNT Agent Eric Broome (Broome) in 2009, while working on DEA assignment, obtained Trap and Trace orders (pen registers) for Defendant James Williams' personal telephone, Defendant Willet Williams' two personal telephones, Defendant Willet Williams' SCMPD work telephone, Defendant Gerido's CNT telephone, Defendant Khaalis' personal telephone, and Defendant Khaalis' CNT telephone. These pen registers were maintained by federal court order for 12 months.

138.

Said pen records showed that the phones of some or all of these defendants (James Williams, Willet Williams, Rodney Gerido, and Malik Khaalis) were used to contact drug trafficking entities and/or individuals known to the DEA in the United States and Mexico. CNT databases also showed links between some or all of these phone numbers and drug organizations known to operate in and around Savannah. See Exhibit D.

139.

Also in 2010, Agent Broome obtained pen registers on a phone number known to belong to Kenneth Gibbons, a “bounty hunter” in the Chatham County area. The pen registers showed that Gibbons called Joshua Varner, a suspected high-level drug dealer and the subject of a CNT Title III Wire Tap, about 5 p.m. on January 27, 2010. At that same time, CNT agents in the wire room heard Varner receive an incoming call advising him to “drop” his phone, which is code to indicate that law enforcement was monitoring the phone line.

140.

Phone records the DEA obtained on Defendant Khaalis’ phone show that just before Gibbons called Varner, Defendant Khaalis called Gibbons.

141.

Because repeated CNT attempts to monitor Varner’s line had been unsuccessful, DEA and CNT agents suspected that someone inside CNT was leaking information to Varner, Murdock, and their associates. Specifically, these agents suspected Defendant Khaalis.

142.

DEA and CNT agents subsequently kept the Varner wiretap secret – restricting the knowledge that the wiretap was being sought to just a few agents – until a briefing at 12:30 p.m.

on January 27, 2010. Agents reported that, during the briefing, Defendant Khaalis looked shocked when he heard that Varner's phone was being tapped.

143.

After the briefing ended, about 3 p.m. on January 27, 2010, Defendant Khaalis left his assigned post in the wire room and did not return until about 5 p.m., minutes before Varner received the call to "drop" his phone. See Exhibit D.

Installation of Willie Lovett as Chief of Police

144.

As is more fully discussed above, at least three of the four PPC members (City Manager, County Commission Chair, and City Manager), were on actual notice of Lovett's corruption, and took the substantial step to assist the ongoing corruption by voting to make Defendant Lovett Chief.

Hot Boys Investigation

145.

In 2012, Plaintiff von Loewenfeldt was part of a group of officers that came to be known as the Tactical Investigation Unit (hereinafter, "TIU").

146.

During that time, TIU targeted a car theft ring known as the "Hot Boys," a group of individuals in their late teens and early twenties whose modus operandi was to steal cars from rental companies in order to commit other crimes.

147.

One of the subjects targeted by Plaintiff von Loewenfeldt, and TIU, was Devontae Hinton, a Hot Boy. Despite TIU efforts, Hinton repeatedly evaded arrest.

148.

Officers discovered that Hinton was able to disappear when arrest was imminent because his mother, Wanda Jones, had a “special friend” in SCMPD, whom she referred to as “my booboo.”

149.

Ms. Jones identified the “special friend” as Defendant Henderson, a SCMPD officer.

150.

Ms. Jones’ cell phone was later confiscated and preliminary investigation matched calls and text messages between Defendant Henderson and Jones on dates and at times when TIU officers were closing in to arrest Hinton.

151.

When Plaintiff von Loewenfeldt attempted to report this information to Defendant Ramsey, Defendant Ramsey instructed Plaintiff von Loewenfeldt to keep quiet, so as to not ruin the name of a good officer.

152.

Defendant Ramsey instructed Plaintiff von Loewenfeldt to refrain from reporting evidence of Defendant Henderson’s illegal activity to Internal Affairs.

153.

Upon information and belief, Defendant Lovett stated in a meeting that Plaintiff von Loewenfeldt deserved to be fired for his handling of Defendant Henderson and the Hot Boys investigation. This communication made by Defendant Lovett, the Chief of Police, knowing that it would be relayed directly or indirectly to Plaintiff von Loewenfeldt, a Sergeant with SCMPD, was a violation of O.C.G.A. § 16-10-32 and/or 16-10-93(a).

154.

Despite strong evidence of corruption, Lovett promoted Defendant Henderson to the rank of Sergeant in June 2013. At that same time, Plaintiff Michael Delatorre's fellow officers had just voted him SCMPD's 2013 "Detective of the Year." However, despite being qualified and applying for a promotion to Sergeant, Michael Delatorre was not promoted.

155.

Plaintiff Michael Delatorre was also elected SCMPD "Law Enforcement Officer of the Year" in 2005 and elected "CNT Agent of the Year" in 2010. Michael Delatorre received no fewer than eight official commendations while assigned to CNT from 2004 to 2010. He has 2,500 hours of specialized law enforcement training in 40 different areas, including bomb threat assessment, death investigations, terrorism, gang investigations, meth lab safety, and high-risk warrant service. He was never promoted to Sergeant.

TRAP Investigation

156.

In 2011, SCMPD TRAP officers unsuccessfully attempted a series of drug busts on Savannah's Westside. Plaintiff Michael Delatorre was assigned to TRAP at the time.

157.

Drug busts in other parts of town, meanwhile, yielded results.

158.

TRAP officers suspected that someone within the Department, most likely within TRAP itself, was leaking information about imminent raids to drug dealers. The target of their investigation was Defendant Henderson.

159.

For example, during a 2012 briefing before a series of drug busts, Defendant Henderson walked into the briefing room and, upon noticing a list of the target locations, immediately began texting this information on his cell phone. All officers had been told prior to the briefing that no phones could be used while the briefing was taking place.

160.

Supervisors told Defendant Henderson to stop texting, but he continued, and was expelled from the briefing room.

161.

Although Defendant Henderson had been told to have no further involvement with these imminent busts, Defendant Henderson arrived at the site of one of drug busts. Without consulting any of the present officers, Defendant Henderson allowed a potential suspect, who was being detained, to leave.

162.

Upon information and belief, Defendant Henderson was able to thwart at least ten attempts by TRAP officers to seize illegal drugs.

James Williams Investigation

163.

In June 2008, Plaintiff Peter Delatorre received information from a confidential informant pertaining to an on-going investigation by CNT into a sophisticated drug supply ring located within Chatham County. This investigation continued until August 2010. See Exhibit D.

164.

The initial subject of the investigation was the informant's drug supplier, Percy June Anderson (aka Pig/Piggy); however, the informant also identified two individuals who also participated in the distribution of the drugs. The informant identified Defendant Willet Williams, officer for SCMPD, as a participant the trafficking. Defendant Willet Williams' brother, Defendant James Williams, was also a subject of the investigation.

165.

As the investigation continued, CNT officers began to suspect that a member of the narcotics unit was providing information to individuals under investigation, including Defendant James Williams, Defendant Willet Williams, Hezekiah Murdock, and Josh Varner.

166.

The CNT investigation team identified this individual as Defendant Malik Khaalis.

167.

On June 9, 2010 Defendant Khaalis voluntarily took a polygraph exam administered by an FBI polygrapher.

168.

To polygrapher's first question, "Did you warn Willet Williams his brother was under investigation by CNT?" Defendant Khaalis answered "No." The result: Deception Indicated.

169.

To polygrapher's second question, "Did you ever use your official position to protect anyone involved in the trafficking of illegal drugs?" Defendant Khaalis answered "No." The result: Deception Indicated.

170.

Plaintiff Peter Delatorre returned to CNT on July 4, 2009. DEA agents instructed Plaintiff Peter Delatorre to tell Defendant Khaalis that the “investigation [into Defendants James Williams and Willet Williams] was over.”

171.

On July 27, 2010, SCMPD Internal Affairs office received summaries of witness interviews concerning Defendant Khaalis’ illegal activities.

172.

Later that same day, July 27, 2010, Defendant Wiley, SCMPD Internal Affairs, briefed Defendant Lovett on the Khaalis and Williams matter.

173.

After the July 27, 2010 briefing, Defendant Lovett instructed Defendant Wiley to take Defendant Khaalis off Administrative Leave and return him to active duty.

174.

Defendant Khaalis’ Administrative Leave ended on August 13, 2010, and he was assigned to a Patrol Division precinct effective August 16, 2010.

175.

In mid- 2010, CNT Director Roy Harris inquired with Internal Affairs officers Defendant Wiley and Defendant Oliver as to whether there was a pending IA investigation into Defendant Khaalis.

176.

At that time, Defendants Wiley and Oliver told Roy Harris that there was no investigation into Defendant Khaalis. This statement was false, was given with the intent to deter proper law

enforcement investigation into Defendant Khaalis, and was made in violation of O.C.G.A. § 16-10-20.

177.

There was in fact a pending IA investigation into Defendant Khaalis at the time of Director Roy Harris' request. SCMPD Sergeant Tim Thompson secretly confirmed the existence of the IA investigation when he handed Roy Harris a piece of paper that listed the IA Case Number for the investigation of Defendant Khaalis.

178.

On September 10, 2010, individuals from federal law enforcement agencies, along with CNT Director Roy Harris, met with Defendant Lovett and informed him of Plaintiffs Peter and Michael Delatorre's investigation within CNT and its implication of Defendant Khaalis.

179.

On or about September 10, 2010, in Chatham County, Defendant Lovett made a false statement to Roy Harris, in violation of O.C.G.A. 16-10-20, to wit: "I have never seen the Internal Affairs memo on Malik Khaalis."

180.

On September 24, 2010, CNT Director Roy Harris sent a detailed memorandum to Chatham County Manager Defendant Abolt. This memo and report contained considerable investigative detail regarding the activities of Defendants Khaalis and Willet Williams.

181.

Upon receipt, Defendant Abolt directed his agent, Chatham County Attorney Jonathan Hart, to hand-deliver the detailed memo and supplemental report directly to Defendant Lovett.

182.

On October 5, 2010, Jonathan Hart delivered the memo and report to Defendant Lovett.

183.

On or about October 29, 2010, Defendant Lovett, in Chatham County, did knowingly intimidate Peter Delatorre, Michael Delatorre, Lawrence Harris, and other SCMPD employees, by ordering the transfer of those officers out of CNT, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to other law enforcement officers investigating corruption within CNT, in violation of O.C.G.A. §§ 16-10-93(a) and/or 16-10-32.

184.

While on Administrative Leave, Defendant Khaalis was allowed to sit for the SCMPD Sergeant's test. Defendant Lovett promoted Defendant Khaalis. Plaintiffs Michael Delatorre, Peter Delatorre, and Robert von Loewenfeldt were eligible for promotion but were passed over.

185.

On January 22, 2014, Defendant Khaalis was indicted by the Chatham County Grand Jury on charges of violating O.C.G.A. § 16-10-20 (False Statements) and O.C.G.A. § 16-10-1 (Violation of Oath by Public Officer).

186.

The following acts, described in detail above and below constitute a pattern of racketeering activity in that they were committed in furtherance of one or more incidents, schemes, or transactions that had the same or similar intents, results, accomplices, victims or methods of commission or otherwise were interrelated by distinguishing characteristics.

Plaintiffs Injured By Reason of RICO Violations

187.

Plaintiffs reallege and incorporate by reference herein the allegations set forth in the paragraphs above and below, as if fully restated herein.

Peter Delatorre

188.

On October 29, 2010, officers Michael Eric Broome, Lawrence Harris, Michael Delatorre, and Peter Delatorre were transferred out of CNT unit. Said orders were special orders that came directly from Defendant Lovett.

189.

In early October 2010, Michael Eric Broome, Lawrence Harris, Michael Delatorre, and Peter Delatorre heard a rumor that they were going to be transferred out of CNT. Thus, prior to receiving the written orders on October 29, 2010, all four officers requested a meeting with Defendant Tolbert. At this meeting, the officers expressed their fear of personal safety and the possibility of retaliation by Defendant Khaalis and other officers assigned to Precinct #3 (Central) and Precinct #2 (Downtown) who had been implicated by the investigation.

190.

Out of fear for his personal safety, Plaintiff Peter Delatorre requested a transfer to Precinct 4 (Southside).

191.

Out of fear for his personal safety, Plaintiff Lawrence Harris requested a transfer to Precinct 2 (Downtown).

192.

Defendant Tolbert acknowledged she had received information about the investigation on Defendant Khaalis. However, Defendant Tolbert lied to Peter Delatorre and told him he had no reason to worry. Further, Defendant Tolbert refused to stop the transfers from occurring or to assign Peter Delatorre or Lawrence Harris to a safe precinct.

193.

Even after protest and concern for their personal safety, Plaintiffs Peter Delatorre and Harris were assigned to Central Precinct Patrol.

194.

On October 29, 2010, Plaintiff Peter Delatorre notified Sgt. Armando Tamargo of his concern for his own safety and fear of retribution. On November 1, 2010, Plaintiffs Peter Delatorre and Harris met with Lt. Charles McAuliffe to again express fear of punishment for participating in a criminal investigation of fellow officers, and deterrence from future reporting of similar activity.

195.

On December 1, 2010, pursuant to a special order from Chief Lovett, Defendant Gerido was transferred from CNT to Central Precinct, the same precinct as Plaintiffs Peter Delatorre and Harris. Cpl. Gerido was one of the officers who had previously been investigated in relation to the Delatorres' investigation of CNT.

196.

During the week of December 19, 2010, Plaintiff Peter Delatorre was offered a position on the Robbery Unit. Transferring into the Robbery Unit would have advanced Plaintiff Peter

Delatorre's career and improved his personal safety. Defendant Lovett denied the transfer in order to harm Plaintiff Peter Delatorre economically and in an effort to force him to quit his job.

197.

During this same period, Plaintiff Peter Delatorre requested a transfer to the Crime Suppression Unit (CSU).

198.

On January 27, 2011, Peter Delatorre discovered that Officer John Garcia, an officer with lesser qualifications than Peter Delatorre, was selected. Officer Garcia had only two (2) years of tenure with the Department.

199.

Plaintiff Peter Delatorre sought an explanation regarding a less-qualified officer's selection for the position. He learned that "command staff above Capt. Herron," stated that Peter Delatorre "would remain on patrol for an unknown amount of time before a transfer would be considered." Sgt. Brown explained that Peter Delatorre "would know why this happened."

200.

Transferring to CSU would have advanced Plaintiff Peter Delatorre's career and improved his personal safety. Defendant Lovett denied the transfer to CSU in order to harm Plaintiff Peter Delatorre economically and in an effort to force him to quit his job.

201.

On January 7, 2011 Chatham County District Attorney's Office, Assistant District Attorney (ADA), Jerry Rothschild, contacted Plaintiff Peter Delatorre regarding the files and evidence related to Defendant Willet Williams.

202.

On or about January 10, 2011, Plaintiff Peter Delatorre was told to report to Internal Affairs (IA) by Defendant Oliver.

203.

On or about February 8, 2011, Plaintiff Peter Delatorre attended an IA investigatory interview with Defendant Oliver.

204.

At one or both meetings, Defendant Oliver informed Peter Delatorre the Defendant Lovett objected to being referred to as “dirty” and “corrupt.”

205.

In or around September 2011, Defendant Willet Williams was transferred to Central Precinct “C-Watch” as a Star Corporal. This was the same precinct and shift to which Plaintiff Peter Delatorre was assigned. Defendant Lovett ensured that Defendant Williams would be one of the officers supervising Plaintiffs Peter Delatorre and Harris.

206.

Defendant Lovett knowingly and intentionally placed Defendant Willet Williams in a supervisory role over Plaintiffs Peter Delatorre and Harris in an attempt to intimidate them into quitting their jobs and to eliminate any chance of promotion.

207.

Plaintiff Peter Delatorre immediately notified his first line supervisor, Sgt. Eddie Grant, of the problem and his fear for safety.

208.

Defendant Willet Williams was aware Plaintiff Peter Delatorre was a person who named him as a subject of the previous investigation. Peter Delatorre was forced to go on calls with Willet Williams, and Peter Delatorre feared Willet Williams would intentionally put Peter Delatorre's life in danger.

209.

Prior to being placed over Plaintiffs Peter Delatorre and Harris, Defendant Willet Williams had been assigned to Downtown Precinct where he supervised and monitored Eric Broome, until Officer Broome left the department.

210.

On September 6, 2011, Plaintiff Peter Delatorre attended a meeting with Captain Ben Herron who claimed to be unaware of the problem, but promised to contact Defendant Tolbert.

211.

On September 7, 2011, Captain Ben Herron falsely advised Plaintiff Peter Delatorre he need not worry about Willet Williams.

212.

On September 12, 2011, during a third in-person meeting, Captain Herron confirmed having discussed the matter with Defendant Tolbert. Captain Herron informed Plaintiff Peter Delatorre that Tolbert's opinion was that Peter Delatorre had no need to be alarmed or concerned, unless charges were brought against Defendant Willet Williams.

213.

At this meeting, on September 12, 2011, Plaintiff Peter Delatorre presented a transfer request for Southside Precinct, which Captain Herron signed. Captain Herron assured Peter Delatorre he would give the transfer order to Defendant Tolbert.

214.

The transfer request was delayed for one month, while Plaintiff Peter Delatorre was forced to work alongside Defendant Willet Williams, fearing for his life.

215.

Plaintiff Peter Delatorre scheduled several meetings with Major Tolbert. At each meeting, Defendant Tolbert told Plaintiff Peter Delatorre she would discuss the issue with Defendant Lovett and get back to him. Peter Delatorre followed up with Tolbert several times, and eventually Tolbert told him she would let him know when she heard back from Defendant Lovett.

216.

Upon information and belief, Defendant Tolbert conspired with Defendant Lovett to delay and deny Plaintiff Peter Delatorre's transfer to the Southside Precinct. Lovett and Tolbert denied said transfer in an intentional effort to intimidate Peter Delatorre and to cause him to resign from SCMPD based upon fear for his personal safety.

217.

During his tenure at the Savannah Police Department, the merged SCMPD, and CNT, Plaintiff Peter Delatorre was voted SCMPD "Officer of the Year" by his fellow officers and was also voted CNT "Agent of the Year." In 2004, he was nominated by his fellow officers to receive a National Association of Chiefs of Police "Top Cop" Award and was selected by the National

Association of Chiefs of Police for that honor. In 2010, he received a national Organized Crime Drug Enforcement Award for Excellence. Despite this, and despite being eligible for promotion, Peter Delatorre was not promoted to Sergeant in either April 2011, or February 2012.

218.

During this time, Defendant Gerido, whom Plaintiff Peter Delatorre investigated for corruption, was promoted to Sergeant. Defendant Khaalis, whom Peter Delatorre investigated for corruption, was also promoted to Sergeant during this time.

219.

On November 2012, having been removed from CNT, assigned to work under the supervision of corrupt officers, having been denied transfers and career advancement, and while being in constant fear for his life and safety, Plaintiff Peter Delatorre had no choice but to resign from SCMPD.

220.

Plaintiff Peter Delatorre was the intended victim of Defendant Lovett's multiple violations of O.C.G.A. § 16-10-32 and/or § 16-10-93(a). Plaintiff Peter Delatorre's transfer out of CNT arose directly out of the commission of these predicate acts. Plaintiff Peter Delatorre's failure to be promoted arose directly out of the commission of these predicate acts. Plaintiff Peter Delatorre's inability to advance his career via special assignments arose directly out of the commission of these predicate acts. Plaintiff Peter Delatorre's constructive termination arose directly out of the commission of these predicate acts.

221.

Threatening honest police officers was a foreseeable consequence of a scheme to operate a corrupt department.

222.

Plaintiff Peter Delatorre suffered economic harm as a direct result of the acts of the Defendants including, but not limited to: loss of pay when he was transferred out of CNT; loss of pay when he was wrongfully passed over for promotion and/or special assignments; loss of his accrued hours of sick time and when he was constructively terminated; temporary periods of unemployment; decrease in pay from his income at SCMPD, and his new employer.

223.

Plaintiff Peter Delatorre has also suffered emotional harm as a direct result of the acts of the Defendants described herein.

Michael Delatorre

224.

Plaintiff Michael Delatorre was also the victim of Defendant Lovett's multiple violations of O.C.G.A. § 16-10-32 and/or § 16-10-93. Plaintiff's transfer out of CNT into a hostile precinct arose directly out of the commission of this predicate act.

225.

Shortly before he was transferred from CNT to SCMPD, Plaintiff Michael Delatorre had been selected for a CNT assignment with Homeland Security Investigations, a position which offered a significant annual pay raise, experience working in federal law enforcement and opportunities for career advancement. As a result of Defendant Lovett's hostile transfer, Michael Delatorre was unable to take the assignment.

226.

In April 2011, Defendant Lovett promoted Defendant Gerido to Sergeant. The promotion came despite Gerido coming under scrutiny in the CNT corruption probe in 2009 and 2010.

Plaintiffs Michael Delatorre, Peter Delatorre, and Robert von Loewenfeldt were eligible for promotion but were passed over.

227.

When he was promoted, Defendant Gerido was moved from Precinct 3 to Precinct 4, where he was Plaintiff Michael Delatorre's direct supervisor. Michael Delatorre feared for his personal safety as he worked under an officer whom he had investigated for corruption.

228.

Defendant Lovett knowingly and intentionally placed Defendant Gerido in a supervisory role over Plaintiff Michael Delatorre in an attempt to intimidate him into quitting his job and to eliminate any chance of promotion.

229.

On April 11, 2011, Officer Kelvin Frazier was promoted to the rank of Sergeant, and placed in command of Michael Delatorre in Precinct 4. On July 27, 2011 Frazier pleaded guilty in U.S. District Court, Southern District of Georgia to misprision (i.e. having knowledge of a crime and taking affirmative acts to conceal it) for covering up Defendant Sawyer's May 22, 2010 "shakedown" in a Savannah nightclub of an FBI agent posing as a drug dealer. Frazier was sentenced to nine months in a federal prison.

230.

On or about May 2011, Plaintiff Michael Delatorre was one of three SCMPD officers selected as finalists for a special assignment with the DEA. The DEA interviewed the finalists, but Lovett insisted that he, not DEA agents, select which officer received the assignment. Michael Delatorre was not selected.

231.

Said special assignment would have advanced the career of Plaintiff Michael Delatorre. Defendant Lovett knowingly and intentionally denied said transfer to injure Michael Delatorre economically and to deter and/or intimidate him from making any further attempts to root out corruption at SCMPD.

232.

In March of 2013, Savannah's FBI Violent Crimes Task Force requested Plaintiff Michael Delatorre be assigned to the task force. Michael Delatorre underwent a federal background check to obtain Top Secret FBI clearance. FBI Senior Supervisory Resident Agent Gene Kowell selected Michael Delatorre believing he had Lovett's permission to select whichever SCMPD officer he wanted assigned to the task force. Kowell selected Michael Delatorre while Lovett was on vacation.

233.

Lovett returned from vacation, found Michael Delatorre had been selected, and insisted that candidates for the assignment go through a formal application and interview process. After interviews were completed, the FBI again selected Michael Delatorre.

234.

Lovett refused to approve the transfer and met with Kowell, giving Kowell a list of officers he wanted Kowell to choose from for the position. At Lovett's insistence, an email was sent to all SCMPD officers offering them the chance to apply for the FBI slot. A second round of applications was completed, and Michael Delatorre was selected once again. Lovett denied the transfer.

235.

Said task force assignment would have advanced the career of Plaintiff Michael Delatorre. Defendant Lovett knowingly and intentionally denied said transfer to injure Michael Delatorre economically and to deter and/or intimidate him from making any further attempts to root out corruption at SCMPD.

236.

During the final three years of his career at SCMPD, Plaintiff Michael Delatorre was eligible for promotion to Sergeant. In 2013, Michael Delatorre's fellow officers voted him SCMPD's "Detective of the Year."

237.

However, Plaintiff Michael Delatorre was passed over for promotion in April 2011, February 2012, and June 2013. During this time, three corrupt officers were promoted by Defendant Lovett: 1) Defendant Gerido in April 2011, 2) Defendant Khaalis in February 2012, and 3) Defendant Henderson in 2013.

238.

In November 2013 having been removed from CNT, assigned to work under the supervision of a corrupt officer, having been denied transfers and career advancement, and while being in constant fear for his life and safety, Plaintiff Michael Delatorre had no choice but to submit his resignation from SCMPD.

239.

Plaintiff Michael Delatorre was the intended victim of Defendant Lovett's multiple violations of O.C.G.A. § 16-10-32 and/or § 16-10-93(a). Michael Delatorre's transfer out of CNT arose directly out of the commission of these predicate acts. Michael Delatorre's failure to

be promoted arose directly out of the commission of these predicate acts. Michael Delatorre's inability to advance his career via special assignments arose directly out of the commission of these predicate acts. Michael Delatorre's constructive termination arose directly out of the commission of these predicate acts.

240.

Plaintiff Michael Delatorre suffered economic harm as a direct result of the acts of the Defendants including, but not limited to: loss of pay when he was transferred out of CNT; loss of pay when he was wrongfully passed over for promotion and/or special assignments; loss of his accrued hours of sick time and when he was constructively terminated; temporary periods of unemployment; decrease in pay from his income at SCMPD, and his new employer.

241.

Plaintiff Michael Delatorre has also suffered emotional harm as a direct result of the acts of the Defendants described herein.

Robert von Loewenfeldt

242.

In January 2005, Plaintiff von Loewenfeldt was promoted to Sergeant by former Chief of Police Dan Flynn. Later that year, Defendant Lovett became interim Chief of Police.

243.

In 2006, Plaintiff von Loewenfeldt applied for a position as the Detective Sergeant over the Auto Theft Unit and was awarded the position.

244.

In the summer of 2010, Plaintiff von Loewenfeldt was assigned to a newly formed task force created to locate and arrest 20 specific people responsible for several recent shootings. In

just ten (10) days, von Loewenfeldt's team arrested all twenty people and solved several of the shootings.

245.

Plaintiff von Loewenfeldt suggested to Major Mark Gerbino (the head of the Criminal Investigation Division) that this team remain intact and focus its efforts onto the top 100 wanted people in Savannah. Major Gerbino agreed. However, two days later, von Loewenfeldt was sent back to the Downtown Precinct by Defendant Lovett.

246.

On various occasions during his employment at SCMPD, Plaintiff von Loewenfeldt would receive an assignment which advanced his career only to have that assignment be overruled by Defendant Lovett. On several occasions, von Loewenfeldt would receive the new assignment and have it be overruled by Lovett within twenty-four hours. It was only after the "Hot Boys" investigation that von Loewenfeldt understood that Lovett was seeking to punish and intimidate him.

247.

On or about February 2011, Major Gerbino was moved from the Criminal Investigations Division to head up SCMPD's Special Operations Unit. Plaintiff von Loewenfeldt's bomb squad fell under that unit. Immediately after Gerbino was transferred, Defendant Lovett told Gerbino to "find a reason" to fire von Loewenfeldt – because he, "didn't know his place."

248.

Knowing that Plaintiff von Loewenfeldt was an asset to SCMPD, Gerbino found excuses to give to Defendant Lovett in order to avoid firing von Loewenfeldt.

249.

Plaintiff von Loewenfeldt continued to work with the bomb squad. During this time, he applied for and received numerous grants on behalf of SCMPD and the City of Savannah. He also received numerous commendations, awards, and recognition.

250.

Despite these successes – and despite holding training certifications in no fewer than 61 different areas of law enforcement, areas as diverse as underwater bomb disarmament, homicide investigations, blood splatter analysis, underwater IED location, and response to terrorist bombings – despite holding a Top Secret Security Clearance – Plaintiff von Loewenfeldt was never promoted, and his career did not advance.

251.

Defendant Lovett did not allow Plaintiff von Loewenfeldt to advance in his career, transferred him inexplicably, and ordered him fired due to von Loewenfeldt's investigations into Defendant Henderson and his questioning of the actions of Defendant Phillips.

252.

In March 2013, Plaintiff von Loewenfeldt realized no matter how hard he worked, how much grant money he brought the city of Savannah, or how effectively he supervised an office that saw the greatest reduction in crime, his attempts to advance his career under Defendant Lovett's regime would always be frustrated and that his job would be constantly at risk.

253.

Based upon his treatment by Defendant Lovett, Plaintiff von Loewenfeldt was forced to resign his position with SCMPD and move to another law enforcement department, and in March 2013, von Loewenfeldt tendered his resignation.

254.

Plaintiff von Loewenfeldt was the victim of witness intimidation, O.C.G.A. § 16-10-32 and/or § 16-10-93(a) and was injured by an inability to advance in his career, inexplicable transfers, and orders that he be fired, and being constructively terminated in 2013.

255.

Plaintiff von Loewenfeldt suffered economic harm as a direct result of the acts of the Defendants including, but not limited to: loss of pay when he was wrongfully passed over for promotion and/or special assignments; loss of his accrued hours of sick time and when he was constructively terminated; temporary periods of unemployment; decrease in pay from his income at SCMPD, and his new employer.

256.

Plaintiff von Loewenfeldt has also suffered emotional harm as a direct result of the acts of the Defendants described herein.

Lawrence Harris

257.

Similar to Plaintiffs Peter Delatorre and Michael Delatorre, Plaintiff Harris was transferred out of CNT in retaliation for the investigation into Defendants Willet Williams, James Williams, and Khaalis.

258.

While at CNT, Plaintiff Harris worked next to Defendant Khaalis and was a witness to his strange behavior. Further, Plaintiff Harris participated in the investigation into Defendants Willet Williams, James Williams, and Khaalis along with Plaintiffs Peter and Michael Delatorre.

259.

In mid- to late-2010, Plaintiff Harris was deposed by the Federal Bureau of Investigation, along with CNT Agent Broome regarding Defendant Khaalis' unusual behavior in the CNT "wire room."

260.

On October 29, 2010, Plaintiff Harris was told he would be transferred out of CNT. There is a policy or procedure for officers leaving CNT that, when they came back to SCMPD from CNT, they are allowed to select the precinct to which they will be assigned.

261.

Plaintiff Harris requested the Downtown precinct. Against his wishes, and in violation of policy or procedure, Plaintiff Harris was assigned to Central Precinct. Further, he was assigned to patrol, a demotion, not in rank, but in prestige and career advancement.

262.

While Plaintiff Harris was at Central Precinct, Defendant Lovett assigned Defendant Willet Williams to supervise and/or monitor Plaintiff Harris.

263.

On November, 1, 2010, Plaintiff Harris reported to Central Precinct. After his assignment in Central Precinct, Plaintiff Harris spoke to Sgt. Don Thompson, and Plaintiff Harris discussed his fear for his safety given his role in investigating SCMPD corruption and Khaalis's position as an officer assigned to Central Precinct.

264.

During his assignment, there were numerous times that Plaintiff Harris was dispatched to calls in which no backup arrived. When Plaintiff Harris did get backup, he had to identify who

the backup officer was to make sure he didn't have to worry for his life. This anxiety jeopardized his life and took his attention away from the task at hand.

265.

In 2010, Plaintiff Harris passed the assessment but was not selected for Sergeant.

266.

On or about November to December 2011, while visiting the Chatham County courthouse, Plaintiff Harris had a conversation with IA investigator Gilbert Walker. Plaintiff Harris had worked with Officer Walker previously and discussed the issues with his safety openly with Officer Walker.

267.

On or about January 2011, Defendant Oliver and Sgt. Lenny Gunter called Plaintiff Harris into IA for an interview. Plaintiff Harris was not told why he was being questioned by IA. The interview was audio recorded, and Plaintiff Harris was informed he was bound to answer all the questions.

268.

During the interview, Defendant Oliver asked Plaintiff Harris if he ever said Defendant Lovett was corrupt and if he believed Lovett was corrupt.

269.

Plaintiff Harris, knowing Defendant Lovett to be corrupt, answered "yes" to both questions. Further, Plaintiff Harris informed Defendant Oliver that Defendant Khaalis should have been in federal prison instead of allowed to take the Sergeant's exam.

270.

Defendant Lovett or agents of Lovett instigated the IA complaint into Plaintiff Harris as retaliation for his role in investigating Defendants Willet Williams, James Williams, and Khaalis and to intimidate Plaintiff Harris into silence about the corruption within SCMPD.

271.

Immediately following the IA interrogation by Defendant Oliver, Plaintiff Harris saw plain-clothes officers following him while he was off-duty.

272.

Specifically, while Plaintiff Harris was shopping at Lowe's he noticed Defendant Oliver and another unknown plain clothes officer in one of the aisles. Plaintiff Harris saw them on several aisles throughout the store during his visit. The two Officers did not speak to him. Lt. Oliver and the other officer remained inside the Lowe's until after Plaintiff Harris left. Plaintiff Harris remained in his car, and noticed they left directly after he left the store without a purchase.

273.

Plaintiff Harris was trained in surveillance techniques and became suspicious and concerned for his safety. Plaintiff Harris knew the other officers were following him, and he questioned how long they have been following him. Plaintiff Harris was worried they had been to his home.

274.

Having informed IA that he knew Defendant Lovett was corrupt and that he had said Lovett was corrupt, Plaintiff Harris knew that he would be fired. Having been tailed by Defendant Oliver and another officer, Plaintiff Harris was in fear for his life and safety.

275.

Thus, on January 5, 2011 Plaintiff Harris was forced to resign his position with SCMPD. Plaintiff Harris was unable to find employment for three (3) months and cashed in his pension to pay for his on-going expenses.

276.

On April 21, 2011, Plaintiff Harris was hired by Bryan County Police Department. On July 8, 2014, Plaintiff Harris obtained employment with Chatham County Sherriff's Office and is currently assigned to CNT.

277.

Plaintiff Lawrence Harris was the victim of Defendant Lovett's multiple violations of O.C.G.A. § 16-10-32 and/or § 16-10-93(a). Plaintiff Harris' transfer out of CNT into a hostile precinct arose directly out of the commission of these predicate acts. The IA investigation into Plaintiff Harris arose directly out of the commission of these predicate acts. The constructive termination of Plaintiff Harris arose directly out of the commission of these predicate acts.

278.

Plaintiff Lawrence Harris suffered economic harm as a direct result of the acts of the Defendants including, but not limited to: loss of pay when he was transferred out of CNT; loss of pay when he was wrongfully passed over for promotion and/or special assignments; loss of his accrued hours of sick time and when he was constructively terminated; temporary periods of unemployment; decrease in pay from his income at SCMPD, and his new employer.

279.

Plaintiff Lawrence Harris has also suffered emotional harm as a direct result of the acts of the Defendants described herein.

Individual Racketeering Activities (Predicate Offenses)

280.

Plaintiffs reallege and incorporate by reference herein the allegations set forth in the paragraphs above and below, as if fully restated herein.

281.

The crimes for which Defendant Lovett was indicted and convicted, which are detailed above, including, but not limited to, paragraphs 40 – 41, are RICO predicate offenses pursuant to O.C.G.A. § 16-14-3(9)(A)(xxix).

282.

The actions of Defendant Lovett, while employed at SCMPD, in threatening, punishing, and intimidating Plaintiff Peter Delatorre in retaliation for his investigation into Defendants James Williams, Willet Williams, and Khaalis and to prevent said Plaintiff from reporting the corruption he uncovered which are detailed above, including, but not limited to, paragraphs 123 – 124, 131 – 132, 163 – 185, and 188 – 223, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

283.

The actions of Defendant Lovett, while employed at SCMPD, in threatening, punishing, and intimidating Plaintiff Michael Delatorre in retaliation for his investigation into Defendants James Williams, Willet Williams, and Khaalis and to prevent said Plaintiff from reporting the corruption he uncovered which are detailed above, including, but not limited to, paragraphs 123 – 124, 131 – 132, 163 – 185, 188 – 223, and 224 – 241, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

284.

The actions of Defendant Lovett, while employed at SCMPD, in threatening, punishing, and intimidating Plaintiff Lawrence Harris in retaliation for his investigation into Defendants James Williams, Willet Williams, and Khaalis and to prevent said Plaintiff from reporting the corruption he uncovered which are detailed above, including, but not limited to, paragraphs 123 – 124, 131 – 132, 163 – 185, 188 – 223, and 257 – 279, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

285.

The actions of Defendant Lovett, while employed at SCMPD, in threatening, punishing and intimidating Plaintiff von Loewenfeldt in retaliation for his investigation into Defendant Henderson and the Hot Boys and to prevent said Plaintiff from reporting the corruption he uncovered and in threatening, punishing, and intimidating Plaintiff von Loewenfeldt in retaliation for his stating and/or reporting to other law enforcement officers that Defendant Phillips was corrupt and to prevent said Plaintiff from reporting said corruption which are detailed above, including, but not limited to, paragraphs 145 – 154 and 242 – 256, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

286.

The actions of Defendant Lovett, while employed at SCMPD, in promoting corrupt police officers, including, but not limited, to Defendants Khaalis, Henderson, and Gerido, which are detailed above, including, but not limited to, paragraphs 104 – 106, 218, 226, and 229, constitute a conspiracy to violate Georgia RICO pursuant to O.C.G.A. § 16-14-4(c).

287.

The actions of Defendant Lovett in calling Major Mark Gerbino and threatening him, which are detailed above, including, but not limited to, paragraphs 48 – 50, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv) and 16-14-3(9)(A)(xxiii).

288.

The actions of Defendant Lovett in making a false statement that he had never seen the IA memo on Defendant Khaalis which are detailed above, including, but not limited to, paragraphs 163 – 179, are RICO predicate offenses pursuant to O.C.G.A. § 16-14-3(9)(B).

289.

The substantial steps taken by Defendants Liakakis, Abolt, and Brown in making Defendant Lovett police chief while having knowledge of his corruption which are detailed above, including, but not limited to, paragraphs 34, 43 – 47, 54, 56, and 144, constitute a conspiracy to violate Georgia RICO pursuant to O.C.G.A. § 16-14-4(c).

290.

The action of Defendant Abolt in telling Defendant Lovett that Major Mark Gerbino had divulged details of Lovett's corruption which is detailed above, including, but not limited to, paragraphs 48 – 51, is an act in furtherance of the conspiracy pursuant to O.C.G.A. § 16-14-4(c).

291.

The action of Defendant Abolt in informing Defendant Lovett about the Roy Harris memorandum which is detailed above, including, but not limited to, paragraph 52 – 53 and 180 – 182, is an act in furtherance of the conspiracy pursuant to O.C.G.A. § 16-14-4(c).

292.

The action of Defendant Brown in blocking then Chief Michael Berkow from firing Defendant Lovett which is detailed above, including, but not limited to, paragraph 55, is an act in furtherance of the conspiracy pursuant to O.C.G.A. § 16-14-4(c).

293.

The action of Defendant Brown in refusing to fire Defendant Lovett as police chief after being told of his corruption by Major Mark Gerbino which is detailed above, including, but not limited to, paragraph 57, is an act in furtherance of the conspiracy pursuant to O.C.G.A. § 16-14-4(c).

294.

The actions of Defendant Khaalis, while employed at SCMPD, in possessing illegal drugs, trafficking illegal drugs, selling illegal drugs, protecting individuals who trafficked in illegal drugs, tampering with evidence, and in using a cellular phone while committing said offenses which are detailed above, including, but not limited to, paragraphs 58 – 62, 86 – 87, 93, 137 – 143, and 163 – 185, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(i), 16-14-3(9)(A)(xvi), and 16-14-3(9)(B).

295.

The crimes for which Defendant Khaalis were indicted, which are detailed above, including, but not limited to, paragraphs 63 and 185, are RICO predicate offenses pursuant to O.C.G.A. § 16-14-3(9)(B).

296.

The actions of Defendant James Williams, while employed at Coastal State Prison in possessing illegal drugs, trafficking illegal drugs, selling illegal drugs, protecting individuals

who trafficked in illegal drugs, and in using a cellular phone while committing said offenses which are detailed above, including, but not limited to, paragraphs 64 – 72, 137 – 143, and 163 – 185, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(i) and 16-14-3(9)(B).

297.

The actions of Defendant Willet Williams, while employed at SCMPD, in possessing illegal drugs, trafficking illegal drugs, selling illegal drugs, protecting individuals who trafficked in illegal drugs, and in using a cellular phone while committing said offenses which are detailed above, including, but not limited to, paragraphs 73 – 80, 92, 137 – 143, and 163 - 185, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(i) and 16-14-3(9)(B).

298.

The actions of Defendant Sawyer, while employed at SCMPD, in possessing illegal drugs, trafficking illegal drugs, selling illegal drugs, protecting individuals who trafficked in illegal drugs, and in using a cellular phone while committing said offenses which are detailed above, including, but not limited to, paragraphs 81 – 85, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(i) and 16-14-3(9)(B).

299.

The crimes for which Defendant Sawyer was indicted and convicted, which are detailed above, including, but not limited to, paragraphs 88 – 90, are RICO predicate offenses pursuant to O.C.G.A. § 16-14-3(9)(A)(xxix).

300.

The actions of Defendant Gerido, while employed at SCMPD, in protecting individuals who trafficked in illegal drugs and in using a cellular phone while committing said offenses

which are detailed above, including, but not limited to, paragraphs 91 – 93, 137 – 143, and 227 – 228, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(i) and 16-14-3(9)(B).

301.

The actions of Defendant Tolbert, while employed at SCMPD, in assisting Defendant Lovett in threatening, punishing, and intimidating Plaintiffs Peter Delatorre, Michael Delatorre, and Lawrence Harris in retaliation for their investigation into Defendants James Williams, Willet Williams, and Khaalis and to prevent said Plaintiffs from reporting the corruption they uncovered which are detailed above, including, but not limited to, paragraphs 94 – 99, 188 – 223, 224 – 241, and 257 – 279, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

302.

The actions of Defendant Phillips, while employed at SCMPD, in interfering with criminal investigations and participating in Defendant Lovett's protection of illegal gambling operations which are detailed above, including, but not limited to, paragraphs 100 – 113, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xvii), 16-14-3(9)(B).

303.

The actions of Defendant Henderson, while employed at SCMPD, in possessing illegal drugs, trafficking illegal drugs, selling illegal drugs, protecting individuals who trafficked in illegal drugs, using a cellular phone while committing said offenses, assisting in harboring a fugitive, and conspiracy to commit theft by taking motor vehicle which are detailed above, including, but not limited to, paragraphs 114 – 122, 145 – 154, and 156 – 162, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(i), 16-14-3(9)(A)(ix) and 16-14-3(9)(B).

304.

The actions of Defendant Ramsey, while employed at SCMPD, in interfering with the investigation into Defendant Henderson and protecting the illegal activity of Henderson which are detailed above, including, but not limited to, paragraphs 125 – 126 and 145 – 154, are RICO predicate offenses pursuant to O.C.G.A. § 16-14-3(9)(B).

305.

The actions of Defendant Wiley, while employed at SCMPD, in threatening, punishing, and intimidating Plaintiffs Peter Delatorre, Michael Delatorre, and Lawrence Harris in retaliation for their investigation into Defendants James Williams, Willet Williams, and Khaalis and to prevent said Plaintiffs from reporting the corruption they uncovered, making false statements that the City Attorney's Office had reviewed the IA report and found no illegal activity by Khaalis and Willet Williams, making false statements that there was no IA investigation into Khaalis, violating his oath of office by wrongfully taking corrupt officers off administrative leave and returning them to active duty, and in violating his oath of office by refusing to fire, suspend, or discipline corrupt officers, which are detailed above, including, but not limited to, paragraphs 127 – 130, 175 – 177, 188 – 223, 224 – 241, and 257 – 279, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

306.

The actions of Defendant Oliver, while employed at SCMPD, in threatening, punishing, and intimidating Plaintiffs Peter Delatorre, Michael Delatorre, and Lawrence Harris in retaliation for their investigation into Defendants James Williams, Willet Williams, and Khaalis and to prevent said Plaintiffs from reporting the corruption they uncovered, making false statements that the City Attorney's Office had reviewed the IA report and found no illegal activity by

Khaalis and Willet Williams, making false statements that there was no IA investigation into Khaalis, violating his oath of office by wrongfully taking corrupt officers off administrative leave and returning them to active duty, and in violating his oath of office by refusing to fire, suspend, or discipline corrupt officers, which are detailed above, including, but not limited to, paragraphs 131 – 132, 175 – 177, 188 – 223, 224 – 241, and 257 – 279, are RICO predicate offenses pursuant to O.C.G.A. §§ 16-14-3(9)(A)(xiv), 16-14-3(9)(A)(xxiii), 16-14-3(9)(B).

307.

The above acts of racketeering activity committed by Defendants have the same or similar methods of commission in that they involve threatening, punishing, and intimidating police officers in retaliation for investigating corruption within the department and in that they involve taking direct and indirect action to prevent police officers from reporting corruption when it is uncovered within the department.

308.

The acts of racketeering activity committed by Defendants have the same or similar objective: eliminate or silence honest police officers that interfere with the corrupt activity which occurs within the department.

309.

The acts of racketeering activity committed by Department have the same or similar victims, as all Plaintiffs were SCMPD officers who attempted to investigate and report illegal activity within the Department.

310.

Defendants have intimidated and threatened witnesses, made false statements, violated their oaths of office, and obstructed investigations for a period of time longer than two years, beginning prior to 2010 and continuing at least until 2013.

COUNT I — Violation of O.C.G.A. 16-14-4(a) by SCMPD Defendants

311.

Plaintiffs reallege and incorporate by reference herein the allegations set forth in the paragraphs above and below, as if fully restated herein.

312.

Defendants Lovett, Tolbert, Khaalis, Willet Williams, James Williams Sawyer, Gerido, Phillips, Henderson, Ramsey, Wiley, and Oliver have unlawfully acquired and maintained, both directly and indirectly, interests in, and control of, an enterprise, to wit: SCMPD through a pattern of racketeering activity and proceeds derived therefrom, as described in this Complaint.

313.

SCMPD is an “enterprise” within the meaning of the Georgia RICO Act. Each of the Defendants is a “person” within the meaning of the Georgia RICO Act.

314.

Plaintiffs have been injured by reason of Defendants’ violations of O.C.G.A. 16-14-4(a) and are entitled to recover three times the actual damages sustained.

315.

In addition, the actions of Defendants Lovett, Tolbert, Khaalis, Willet Williams, Sawyer, Gerido, Phillips, Henderson, Ramsey, Wiley, and Oliver show willful misconduct, malice, fraud, wantonness, oppression, and an entire want of care that raises the presumption of conscious

indifference to consequences and specific intent to cause harm, entitling each Plaintiff to receive punitive damages sufficient to deter, penalize, or punish said Defendants in light of the circumstances in this case.

COUNT II — Violation of O.C.G.A. 16-14-4(b) by SCMPD Defendants

316.

Plaintiffs reallege and incorporate by reference herein the allegations set forth in the paragraphs above and below, as if fully restated herein.

317.

Defendants Lovett, Tolbert, Khaalis, Willet Williams, James Williams Sawyer, Gerido, Phillips, Henderson, Ramsey, Wiley, and Oliver did unlawfully, while employed by and associated with an enterprise, to wit: SCMPD, conduct and participate, both directly and indirectly, in said enterprise through a pattern of racketeering activity as described herein.

318.

SCMPD is an “enterprise” within the meaning of the Georgia RICO Act. Each of the Defendants is a “person” within the meaning of the Georgia RICO Act.

319.

Plaintiffs have been injured by reason of Defendants’ violations of O.C.G.A. 16-14-4(b) and are entitled to recover three times the actual damages sustained.

320.

In addition, the actions of Defendants Lovett, Tolbert, Khaalis, Willet Williams, Sawyer, Gerido, Phillips, Henderson, Ramsey, Wiley, and Oliver show willful misconduct, malice, fraud, wantonness, oppression and an entire want of care that raises the presumption of conscious indifference to consequences and specific intent to cause harm, entitling each Plaintiff to receive

punitive damages sufficient to deter, penalize, or punish said Defendants in light of the circumstances in this case.

COUNT III — Conspiracy to Violate O.C.G.A. § 16-14-4 by All Defendants

321.

Plaintiffs reallege and incorporate by reference herein the allegations set forth in the paragraphs above and below, as if fully restated herein.

322.

Defendants Lovett, Liakakis, Abolt, Brown, Tolbert, Khaalis, Willet Williams, Sawyer, Gerido, Phillips, Henderson, Ramsey, Wiley, and Oliver have conspired together to violate O.C.G.A. § 16-14-4(a) and/or (b), in violation of O.C.G.A. § 16-14-4(c).

323.

The nature of the above-described acts, violations of state law in furtherance of a conspiracy give rise to the inference that Defendants not only agreed to the objectives of the enterprise, but by conspiring to violate O.G.G.A. 16-14-4(a) and (b), were also aware that their on-going fraudulent and otherwise illegal acts have been and are a part of an overall pattern of racketeering activity.

324.

SCMPD is an “enterprise” within the meaning of the Georgia RICO Act. Each of the Defendants is a “person” within the meaning of the Georgia RICO Act.

325.

Plaintiffs have been injured by reason of Defendants’ violations of O.C.G.A. 16-14-4(c) and are entitled to recover three times the actual damages sustained.

In addition, the actions of Defendants Lovett, Liakakis, Abolt, Brown, Tolbert, Khaalis, Willet Williams, Sawyer, Gerido, Phillips, Henderson, Ramsey, Wiley, and Oliver show willful misconduct, malice, fraud, wantonness, oppression and an entire want of care that raises the presumption of conscious indifference to consequences and specific intent to cause harm, entitling each Plaintiff to receive punitive damages sufficient to deter, penalize, or punish said Defendants in light of the circumstances in this case.

WHEREFORE, Plaintiffs pray for the following:

- 1) For compensatory damages according to proof;
- 2) Judgment in an amount equal to three times the actual damages sustained by Plaintiffs, pursuant to O.C.G.A. 16-14-6(c);
- 3) For a judgment against the Defendants for punitive damages in an amount left to the enlightened conscience of the Court or jury;
- 4) For costs of suit incurred herein;
- 5) For attorney's fees in the trial and appellate courts and costs of investigation and litigation reasonably incurred, pursuant to O.C.G.A. §§ 10-1-370, 16-14-6; and,
- 6) For any such other or further relief as the Court deems just and proper.

Respectfully submitted, this 1st day of October, 2015.



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EXHIBIT A

**GO # PNL-003
PROMOTIONAL PROCESS****EFFECTIVE DATE: 08/23/04
REVISION DATE: 12/02/05
10/27/10**

PURPOSE:

The purpose of this General Order (GO) is to identify the role of the Savannah-Chatham Metropolitan Police Department (SCMPD) in the promotion process for sworn personnel. [CALEA 34.1.1]

POLICY:

In that the manner in which a police department selects and supports its future leaders has an enormous impact on the present and future quality of the organization, the SCMPD shall strive to develop and promote the best of the best. The best things any sworn employee can do to improve their chances of being promoted are to work hard to excel in practicing SCMPD core values of **Fairness, Integrity, Respect, Service and Teamwork**, producing personal accomplishments that benefit the community, and preparing to compete and excel in the testing, assessment center, and panel interview processes.

Promotion of all SCMPD employees will be governed by this directive in accordance with City of Savannah Civil Service Act and Human Resources policy HR 004 – Certification and Appointments

It is the policy of the SCMPD to provide Equal Employment Opportunity without discrimination based on race, color, religion, creed, sex, national origin, age, or physical handicap.

PROCEDURE:**I. POLICE SERGEANT, POLICE LIEUTENANT, AND POLICE CAPTAIN****A. Administrative Responsibility**

1. The SCMPD will coordinate with the City of Savannah Human Resources Department (CoSHRD) to identify qualified employees for promotions to positions of higher rank and greater responsibility. [CALEA 34.1.1]
2. The SCMPD Support Services Commander or designee shall coordinate with the COSHRD in administering testing and/or assessment center processes. [CALEA 34.1.2]
3. Upon completion of the testing process and certification of qualified candidates for promotion, the Chief of Police or designee will arrange panel interviews. If qualified candidates interview equally well, the Chief of Police or designee may consider seniority, education, and reasonable input from the command staff. [CALEA 34.1.3d]

4. In order to provide for the impartial implementation of the SCMPD promotional process the COSHRD shall arrange, in coordination with the Support Services Commander and with the concurrence of the Police Chief, to prepare and administer all actual written tests, assessment centers, job simulations, or kindred tests by whatever name required for the promotional process.
 5. No member of the SCMPD shall serve as an assessor or evaluator in any actual assessment center, job simulation, or kindred test, by whatever name, conducted specifically to implement the provisions of the promotional process.
- B. Promotional Process Announcement [CALEA 34.1.5]
1. The COS Human Resources Director shall make public announcement of all competitive examinations for SCMPD positions in advance of the date of the examination.
 2. Notice shall be given of the time, place, and general scope of every test.
 3. Information shall be made available to all candidates concerning:
 - Position title.
 - Salary range of the classification.
 - Final date on which applications shall be received.
 - Examination date(s).
 - Duties to be performed.
 - Minimum qualifications required.
 - Essential job function.
 - Rating of examination.
 - Eligibility.
 - Where to apply.
 4. Candidates must complete an Application for City Employees (HR Form 1B) and forward it to COSHRD by the announced closing date.
- C. Evaluation of Promotional Potential [CALEA 34.1.3a]
1. The promotional process is divided into four phases; screening, testing, appointment, and probation phases.
 2. During the screening phase, it is determined if those applying for the position meet eligibility requirements.
 3. During the testing phase, all eligible candidates are evaluated to determine who are qualified for the position.
 4. During the appointment phase, candidates who are the most qualified for the position are selected for promotion.
 5. During the probation phase, promoted Officers are evaluated during their first year in the new position.

D. Administration of Written Tests [CALEA 34.1.3b]

1. A valid multiple-choice written examination may be administered. Any adjustments in scores arising out of any analysis of the test shall be specified in a written report and shall be made available for review by participants.
2. Participants shall be provided with a written bibliography of materials used to develop written test questions.
3. Prior to the administration of the written test, a cutoff score shall be calculated, using any psychometrically appropriate procedure, and this cutoff score shall be approved by the Human Resource Director. The cutoff score so calculated and approved shall be announced prior to the date on which the written test is given. Based on performance on the written test, participants shall be selected for continuation in the promotional testing process. Participants who score at or above the passing score shall go on to participate in an assessment center(s). If the written test fails to yield an adequate number of passing scores, such that a valid promotional roster would not result, performance will be reviewed and weighted accordingly or a new written test will be scheduled, if necessary. Persons achieving a passing score on the original assessment will not be affected by the new test. [CALEA 34.1.6a]
4. Participants will be notified of test scores and provided an opportunity to review test results and accuracy of score calculations. [CALEA 34.1.6a]

E. Use of Assessment Centers [CALEA 34.1.3c]

1. Assessment Centers are recognized by the City of Savannah (COS) as a viable selection tool and may be administered.
2. All participants in the promotional process for Police Sergeant, Police Lieutenant, and Police Captain shall complete an assessment center. Participant performance will be assessed according to behavioral dimensions identified through formal job analysis. [CALEA 34.1.4]
3. The Assessment Centers used for the SCMPD shall, at minimum:
 - a. Measure dimensions, skills, abilities, or knowledge specified in a written job task analysis. [CALEA 34.1.4]
 - b. Use multiple assessors who are thoroughly trained prior to participating in a center.
 - c. Use techniques designed to provide information which is used in evaluating the dimensions, attributes, or qualities previously determined.
 - d. Use multiple assessment techniques, one of which is a simulation.
 - e. Use the kinds of simulation exercises that have been tested prior to use to ensure that the techniques provide reliable, objective, and relevant information and that the exercises are job related. [CALEA 34.1.4]

- f. Base judgments resulting in an outcome on pooled information from assessors and techniques.
 - g. Announce the dimensions to be evaluated in written form.
 - h. Use standardized forms to record and document the observations of assessors at each stage of the process.
 - i. Provide participants, upon request, with written rationale and information concerning the dimensions, ratings, and recommendations of the center.
4. Prior to the administration of an assessment center, a minimally acceptable score shall be calculated. [CALEA 34.1.6a]
- a. The minimally acceptable score shall be calculated using an average of "satisfactory" rating across all dimensions.
 - b. This minimum score shall be approved by the Human Resources Director in consultation with the Chief of Police.
 - c. The minimally acceptable score shall be announced prior to the date on which the assessment center is conducted and candidates who achieve an acceptable score shall be listed as eligible on the promotional roster. [CALEA 34.1.6b]
 - d. If the assessment center fails to yield an adequate number of passing scores, such that a valid promotional roster would not result, performance will be reviewed and weighted accordingly or, if necessary, plans may be made for a new assessment center.
 - e. Persons achieving a passing score on the original assessment will not be affected by the new assessment.

F. Oral Interviews [CALEA 34.1.3d]

- 1. Prior to promotion appointments, a panel of SCMPD Command Staff Officers will participate in oral interviews.
- 2. The interviews will be conducted in order to determine the candidate's communications skills, problem-solving abilities, self-confidence, commitment to SCMPD objectives, and management style.
- 3. Interviews will be conducted in accordance with the COSHRD Interviewing Guidelines policy, a copy of which is available on CityIntranet: \\Policies&Procedures\Personnel\POLICY\Interview Guidelines.doc.
- 4. All members of the interview panel will be thoroughly familiar with the Interviewing Guidelines handbook prior to participating in the interview.
- 5. No member of the interview panel will ask any questions that have not been previously agreed upon and approved by the group or that are described as prohibited by law in the handbook.
- 6. A printed copy of the Interviewing Guidelines policy will be available at all interviews.

7. All scoring and interview notes will be made on the Interview Form in the Interviewing Guidelines booklet.
 8. Once the interview and selection process is completed, all notes and scoring forms will be maintained in a file and forwarded to the SCMPD Personnel Unit to be stored and maintained.
- G. Review and Appeal [CALEA 34.1.3e]
1. The right of a candidate to appeal any aspect of the administration of the promotional process which has a direct impact upon their promotability is fundamental to any equitable system.
 2. Unless specifically barred, the right of an employee to examine written records pertaining to any aspect of their promotability and to make appeals is confirmed.
 3. No adverse consequence or connotation shall attach to employees who exercise this right.
- H. Re-Application [CALEA 34.1.3f]
1. Candidates on a current eligibility list will remain on the list until the establishment of the next eligibility list.
 2. These candidates must re-apply in response to any announcement for promotional testing and/or assessment center by completing a COS Application for City Employees (HR Form 1B) and forwarding it to the COSHRD in order to be eligible to participate in the promotional process.
- I. Lateral Entry [CALEA 34.1.3g]
1. The SCMPD does not make provisions for lateral entry at any rank between Police Officer and Captain.
 2. The SCMPD recognizes the ranks of Major and Assistant Chief of Police as appointed positions that will be appointed only by the Chief of Police.
- J. Security of Promotion Materials [CALEA 34.1.3h]
1. The COSHRD shall be responsible for securing the following records:
 - Examinations.
 - Scores.
 - Files.
 - Administrative directives.
 - Promotional results.
 2. These records shall be stored in a secured area for two (2) years following the publication of each promotional roster.
- K. Eligibility Lists

1. Eligible candidates must attain a minimally acceptable score which shall be calculated using an average of "satisfactory" rating across all dimensions. [CALEA 34.1.6a]
 - a. In any examination, the minimum rating or standing through which eligibility on a register may be earned shall be determined by the Director of Human Resources in consultation with the Chief of Police
 - b. Such final rating shall be based upon a weighted average of the various parts of the total examinations.
 - c. Any part of the examination, may be given on a pass or fail basis.
 - d. All applications for the same classification shall be accorded uniform and equal treatment in all phases of the examination procedure.
 - e. Failure in one phase of an examination shall be grounds for the Director to declare the candidate as failing the entire examination, or to disqualify the candidate for subsequent parts of the examination.
 2. Eligible candidates who achieve an acceptable score shall be listed as eligible on the promotional roster. [CALEA 34.1.6b]
 3. Eligible candidates shall have a minimum of one year time in grade at their present rank having successfully completed a one year probationary period. [CALEA 34.1.6c]
 4. The Assessment Center eligibility list will remain valid for a period of time that accommodates SCMPD growth and attrition rate, as well as the size of the candidate pool. [CALEA 34.1.6d]
 5. The Chief of Police will select Officers for promotion from the final certified list based on review of the individual's test scores, performance ratings, and service record. [CALEA 34.1.6e]
- L. Probationary Period [CALEA 34.1.7]
1. Following the promotion to Sergeant, Lieutenant, or Captain, each Officer will perform one year of probationary service.
 2. If their performance has been documented as unsatisfactory, the Chief of Police may extend the probationary period or elect to demote the candidate to their previous rank.

II. CIVILIAN PERSONNEL PROMOTION

1. The CoS Human Resources Director shall make public announcement of all competitive examinations for SCMPD promotional positions in advance of the date of the examination.
2. Notice shall be given of the time, place, and general scope of every test.
3. Information shall be made available to all candidates concerning:

- Position title.
 - Salary range of the classification.
 - Final date on which applications shall be received.
 - Examination date(s), if applicable.
 - Duties to be performed.
 - Minimum qualifications required.
 - Essential job function.
 - Rating of examination, if applicable.
 - Eligibility.
4. Candidates must complete an on-line Application for City Employees by the announced closing date.
 5. Eligible candidates for promotion will be interviewed by the affected Department Head utilizing CoS Interview Guidelines.
 6. If qualified candidates interview equally well, the Department Head or designee may consider seniority, education, and reasonable input from the command staff.
[CALEA 34.1.2]

This Order supersedes and replaces all other written directives issued prior to 10/27/2010 pursuant to Promotion, Promotion Procedures, or Promotional Process.

BY ORDER OF:

on file

Willie C. Lovett
Chief of Police

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FILED
U.S. DISTRICT COURT
SAVANNAH, GA.
2014 JUN -4 PM 7:08
CLERK
SO. DIST. OF GA.

UNITED STATES OF AMERICA)
)
)
v.)
)
)
WILLIE CLINTON LOVETT,)
)
)
RANDALL WAYNE ROACH,)
AKA "Red")
)
RANDALL WAYNE ROACH, JR.,)
AKA "Randy")
)
KENNY AMOS BLOUNT,)
)
Defendants.)

SUPERSEDING INDICTMENT
CR 414-143

VIO: 18 U.S.C. § 1955
Commercial Gambling

18 U.S.C. § 1951
Extortion

18 U.S.C. § 1511
Conspiracy to Obstruct
Enforcement of State Criminal
Laws

Forfeiture Allegation

THE GRAND JURY CHARGES THAT:

Introduction

At all times relevant to this Indictment:

1. Defendant Willie Clinton Lovett was a Major and then the Chief of the Savannah-Chatham Metropolitan Police Department (SCMPD), formerly the Savannah Police Department (SPD). Savannah and Chatham County are political subdivisions of the State of Georgia.
2. Defendants Randall Wayne Roach, aka "Red," Randall Wayne Roach, Jr.,

aka "Randy," Kenny Amos Blount, aided and abetted by each other, by Defendant Lovett, and by others, conducted an illegal gambling business. The illegal gambling business was conducted in southeast Georgia and in South Carolina, which included numerous yearly stops in Savannah and Chatham County.

3. Since in or around 2004, Defendant Willie Clinton Lovett extorted cash payments from Defendant Randall Wayne Roach, aka "Red," and others, and in return provided protection to the illegal gambling business against enforcement of Georgia gambling laws.

COUNT ONE

Commercial Gambling

18 U.S.C. § 1955

4. Paragraphs 1 through 3 of the Indictment are incorporated by reference as if fully set forth herein.

5. Beginning not later than June 5, 2009, and continuously thereafter up to and including May 8, 2014, in Chatham County, Georgia, within the Southern District of Georgia, and elsewhere, the Defendants Randall Wayne Roach, AKA "Red," Randall Wayne Roach, Jr., AKA "Randy," and Kenny Amos Blount, aided and abetted by each other, by Defendant Willie Clinton Lovett, and by others, did knowingly conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business which involved playing and betting for money and other things of value in games played with dice, balls and cards, and which involved the solicitation of others to gamble with an intent to defraud and deceive, in violation of the laws of the State of Georgia; which illegal gambling business

involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part thereof; and which illegal gambling business remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

All done in violation of Title 18, United States Code, Sections 1955 and 2.

COUNT TWO

Conspiracy to Obstruct Enforcement of State Criminal Laws

18 U.S.C. § 1511

6. Paragraphs 1 through 5 of the Indictment are incorporated by reference as if fully set forth herein.

7. From a date no later than on or about March 16, 2004, and continuing through on or about September 27, 2013, in Chatham County, within the Southern District of Georgia, and elsewhere, Defendants **Willie Clinton Lovett, Randall Wayne Roach, aka "Red," and Kenny Amos Blount**, unlawfully did combine, conspire, confederate and agree with each other and others to obstruct the enforcement of the criminal laws of the State of Georgia, with the intent to facilitate an illegal gambling business.

8. At all times during the course of the conspiracy, the Defendant **Willie Clinton Lovett** was an official or employee of the State of Georgia or a political subdivision thereof, that is, a sworn law enforcement officer with SCMPD or SPD.

9. At all times during the course of the conspiracy, Defendants **Randall Wayne Roach, aka "Red," Kenny Amos Blount**, and others conducted, financed, managed, supervised, directed, and owned all of part of an illegal gambling business.

10. At all times during the course of the conspiracy, the said illegal gambling business

was a violation of the criminal gambling laws of the State of Georgia; involved five or more persons who conducted, financed, managed, supervised, directed and owned all of part of said business; and remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue in excess of \$2,000 in a single day.

Manner and Means of the Conspiracy

11. It was part of the conspiracy that Defendants **Randall Wayne Roach, aka "Red," Kenny Amos Blount** and others would set up an illegal gambling business in downtown Savannah around various holiday celebrations, such as Saint Patrick's Day, New Year's Day and Martin Luther King Day.

12. It was further part of the conspiracy that Defendants **Randall Wayne Roach, aka "Red," Kenny Amos Blount** and others would set up an illegal gambling business at other locations in Savannah and throughout Chatham County separate and apart from various holiday celebrations.

13. It was further part of the conspiracy that Defendant **Willie Clinton Lovett**, a Major with SPD and SCMPD, and then the Chief of SCMPD, would not enforce, and prevent the enforcement of the criminal gambling laws of the State of Georgia, in exchange for cash payments from Defendant **Randall Wayne Roach, aka "Red," Kenny Amos Blount** and others.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the following acts, among others, were committed:

14. On or about March 13, 2013, Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the

criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

15. On or about March 15, 2013, Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

16. On or about March 17, 2013, at about 1:00 a.m., Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

17. On or about March 17, 2013, at about 4:00 p.m., Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

18. Between on or about May 3 and May 12, 2013, Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

All done in violation of Title 18, United States Code, Section 1511.

COUNT THREE

Extortion

18 U.S.C. § 1951

19. Paragraphs 1 through 18 of the Indictment are incorporated by reference as if

fully set forth herein.

20. On or about March 13, 2013, in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT FOUR

Extortion

18 U.S.C. § 1951

21. Paragraphs 1 through 20 of the Indictment are incorporated by reference as if fully set forth herein.

22. On or about March 15, 2013, in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT FIVE

Extortion

18 U.S.C. § 1951

23. Paragraphs 1 through 22 of the Indictment are incorporated by reference as if fully set forth herein.

24. On or about March 17, 2013, at approximately 1:00 a.m., in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT SIX

Extortion

18 U.S.C. § 1951

25. Paragraphs 1 through 24 of the Indictment are incorporated by reference as if fully set forth herein.

26. On or about March 17, 2013, at approximately 4:00 p.m., in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr.,

with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT SEVEN

Extortion

18 U.S.C. § 1951

27. Paragraphs 1 through 26 of the Indictment are incorporated by reference as if fully set forth herein.

28. Between on or about May 3 and May 12, 2013, in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 981(d), and 1955(d), Title 19, United States Code, Sections 1607 through 1609, and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1955, set forth in Count One of this Indictment, the Defendants Randall Wayne Roach,

AKA "Red," Randall Wayne Roach, Jr., AKA "Randy," Kenny Amos Blount and Willie Clinton Lovett shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense and, pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c), any property, including money, used in violation of the offense. The property to be forfeited includes, but is not limited to, the following:

**A white box trailer, Maine license plate number 0321284; and,
4849 Highway 84 East, Ludowici, Georgia 31316.**

3. Upon conviction of an offense in violation of Title 18, United States Code, Section 1511, set forth in Count Two of this Indictment, the Defendants Randall Wayne Roach, AKA "Red," Kenny Amos Blount and Willie Clinton Lovett shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

4. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1951, set forth in Counts Three through Seven of this Indictment, the Defendant Willie Clinton Lovett shall forfeit to the United States of America, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

5. If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

A TRUE BILL.

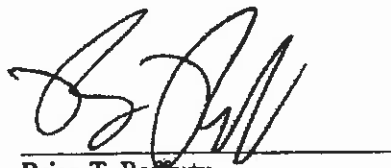
Foreperson



Edward J. Tarver
United States Attorney



James D. Durham*
First Assistant United States Attorney



Brian T. Rafferty
Assistant United States Attorney
Criminal Division Chief



R. Brian Tanner*
Assistant United States Attorney

* denotes lead counsel

EXHIBIT C

Indictment No. _____

13CHM04727/

In the Superior Court of Chatham County, State of Georgia
DECEMBER TERM 2013

THE STATE OF GEORGIA

VERSUS
MALIK ABDUL KHAALIS,

(SPECIAL PRESENTMENT)

OFFENSE(S): MAKING A FALSE STATEMENT,
MAKING A FALSE STATEMENT, MAKING A FALSE
STATEMENT, VIOLATION OF OATH BY PUBLIC
OFFICER, VIOLATION OF OATH BY PUBLIC OFFICER,
MAKING A FALSE STATEMENT, MAKING A FALSE
STATEMENT, MAKING A FALSE STATEMENT AND
MAKING A FALSE STATEMENT

WITNESS(ES):

~~Agent Tracy Sands, GBI;~~
Chief Deputy Roy J. Harris, CCSO,
Major Rusty Smith, CCSO,
John Insogna

Meg Heap
District Attorney
Eastern Judicial Circuit
of Georgia

JEROME M. ROTHSCHILD, JR.
ASSISTANT DISTRICT ATTORNEY

True BILL

1/22, 2014

Sharon Dempsey
FOREPERSON

Filed in office this 22nd day of

January, 2014

David E. Odum
(Deputy) Clerk, Superior Court of
Chatham County, Georgia

Defendant, on _____ being in open court, pleads _____

Defendant Attorney for Defendant

Defendant, on _____ being in open court, PLEADS GUILTY and waives the right to trial by jury; the presumption of innocence; the right to confront witnesses against oneself; the right to subpoena witnesses; the right to testify and to offer other evidence; the right to assistance of counsel during trial; the right not to incriminate oneself; and understands that by pleading not guilty or remaining silent and not entering a plea, one obtains a jury trial.

Defendant Attorney for Defendant

We, the Jury, find the defendant

FOREPERSON DATE

THUMBPRINT(S) OF DEFENDANT
(left) (right)

STATE OF GEORGIA, COUNTY OF CHATHAM

IN THE SUPERIOR COURT OF SAID COUNTY,

BILL OF INDICTMENT
(SPECIAL PRESENTMENT)

THE GRAND JURORS selected, chosen and sworn for the County of Chatham to wit:

1. Sharon D. Dempsey, Foreperson
2. ~~Alana Widener Blocker~~
3. Edward Lawrence Bryant
4. Charles Doyle DeGryse
5. Joseph Edward Dunleavy
6. William Alfred Heath
7. ~~Starr Holland~~
8. Lisa Marie Jackson
9. Jon Bernard Lefcourt
10. Gloria Carolyn Luten
11. Ryen Elizabeth McGee
12. ~~Roshni Ann Molver~~
13. Christie Duty Orta
14. Parul Ashivinkumar Patel
15. Elizabeth S. Pitts
16. ~~Richard Brendan Reeve~~
17. Michael Edward Reiling
18. Rhonda Clark Roberts
19. Daniel Nimah Shambayati
20. ~~Stephen Nicholas Siler~~
21. Shaquita Renee Singleton
22. Steven Wilkens
23. Megan Marie Winn
- 24.
- 25.
- 26.

COUNT 1: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

in the name of and on behalf of the citizens of the State of Georgia, charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 13th day of February, 2010, did knowingly and willfully make a false statement to CNT Agent Lawrence Harris regarding a matter within the jurisdiction of the Chatham-Savannah Counter Narcotics Team, an agency of the Chatham County, Georgia government, in that the accused told Agent Harris that the accused had first conferred with the case agent, before the accused caused a traffic stop to be conducted on one Chassidy Lucas, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 2: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 13th day of February, 2010, did knowingly and willfully make a false statement to CNT Agent Charles Guyer regarding a matter within the jurisdiction of the Chatham-Savannah Counter Narcotics Team, an agency of the Chatham County, Georgia government, in that the accused told Agent Guyer that the accused had first conferred with the case agent, before the accused caused a traffic stop to be conducted on one Chassidy Lucas, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 3: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 14th day of February, 2010, did knowingly and willfully make a false statement to CNT Lieutenant Rusty Smith regarding a matter within the jurisdiction of the Chatham-Savannah Counter Narcotics Team, an agency of the Chatham County, Georgia government, in that the accused told Lieutenant Smith that the accused had first conferred with the case agent, before the accused caused a traffic stop to be conducted on one Chassidy Lucas, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 4: VIOLATION OF OATH BY PUBLIC OFFICER, O.C.G.A. 16-10-1

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of VIOLATION OF OATH BY PUBLIC OFFICER, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 13th day of February, 2010, being a public officer with the Savannah-Chatham Metropolitan Police Department, he did willfully and intentionally violate the terms of his oath as prescribed by law, in that he had sworn to faithfully discharge all the duties which may be required of him; then on February 13th, 2010, he did abandon his post in the Chatham-Savannah Counter Narcotics Team wiretap monitoring room during the wiretap investigation of a certain drug trafficking organization; and without authorization he caused one Chassidy Lucas to be stopped by a uniformed patrolman, without the accused notifying his superior officer or the case agent, as required; when Chastity Lucas was suspected of involvement in the Hezekiah Murdock drug trafficking organization, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 5: VIOLATION OF OATH BY PUBLIC OFFICER, O.C.G.A. 16-10-1

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of VIOLATION OF OATH BY PUBLIC OFFICER, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 2nd day of April, 2010, being a public officer with the Savannah-Chatham Metropolitan Police Department, he did willfully and intentionally violate the terms of his oath as prescribed by law, in that he had sworn to faithfully discharge all the duties which may be required of him; then on April 2nd, 2010, having received a ruse phone call from an FBI informant suggesting that an amount of drug money would be located in the area of the Savannah-Hilton Head Airport, traveled from the Chatham-Savannah Counter Narcotics Team building at 71 Ross Road, to the area of the airport; alone; without informing his supervisor; and falsely claimed to have gone home for lunch, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 6: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 2nd day of April, 2010, did knowingly and willfully make a false statement to fellow agents of the Chatham-Savannah Counter Narcotics Team, regarding a matter within the jurisdiction of the Chatham-Savannah Counter Narcotics Team, an agency of the Chatham County, Georgia government, claiming to have gone home for lunch when in fact the accused traveled to the area of the Savannah-Hilton Head airport, having received information from an FBI informant that money for a drug transaction would be present, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 7: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 28th day of October, 2013, knowingly and willfully make a false statement to John Insogna and George Murray, investigators lawfully tasked by the City Government of Savannah with investigating allegations of corruption and misconduct within the Savannah-Chatham Metropolitan Police Department, a matter within the jurisdiction of the Savannah-Chatham Metropolitan Police Department and the City of Savannah, Georgia Government, in that the accused denied traveling to the area of the Savannah-Hilton Head Airport on or about April 2nd, 2010, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 8: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 28th day of October, 2013, knowingly and willfully make a false statement to John Insogna and George Murray, investigators lawfully tasked by the City Government of Savannah with investigating allegations of corruption and misconduct within the Savannah-Chatham Metropolitan Police Department, a matter within the jurisdiction of the Savannah-Chatham Metropolitan Police Department and the City of Savannah, Georgia Government, in that the accused denied ever interfering with, and attempting to interfere with, the downloading of information from a cellular telephone seized in a drug investigation, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 9: MAKING AN OFFICIAL FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse MALIK ABDUL KHAALIS, with the offense of MAKING A FALSE STATEMENT, for that the said MALIK ABDUL KHAALIS, in the County of Chatham and State of Georgia, on or about the 28th day of October, 2013, did knowingly and willfully make a false statement to John Insogna and George Murray, investigators lawfully tasked by the City Government of Savannah with investigating allegations of corruption and misconduct within the Savannah-Chatham Metropolitan Police Department, a matter within the jurisdiction of the Savannah-Chatham Metropolitan Police Department and the City of Savannah, Georgia Government, in that the accused denied having telephonic contact on April 16th, 2009, with Star Corporal Willet Williams, whose brother James Williams was then under surveillance for allegations of cocaine trafficking by the Savannah-Chatham Counter Narcotics Team, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.



**MEG HEAP
DISTRICT ATTORNEY
EASTERN JUDICIAL CIRCUIT
OF GEORGIA**

EXHIBIT D

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<i>SUPPLEMENTAL REPORT</i>		

INCIDENT: DRUG INVESTIGATION	LOCATION: 1463 EAST 40 TH STREET
VICTIM: CNT	ADDRESS: 71 ROSS ROAD

DETAILS:

During the month of June 2008, the CNT began receiving information from a cooperating defendant. The informant will hereafter be referred to as SOI 1. SOI 1 provided information on his/her drug supplier, Percy June ANDERSON, aka PIG/PIGGY.

SOI 1 explained how ANDERSON was conducting drug transactions with law enforcement officers not only within Savannah but also the surrounding area. SOI 1 said this organization was selling multiple kilograms of cocaine and high grade marijuana. According to SOI 1, he/she accompanied ANDERSON on two occasions to a residence located at the corner of 40th and Bee Road to purchase large quantities of drugs. On both occasions, SOI 1 observed ANDERSON conduct a drug transaction with a uniformed officer. Also on both occasions, ANDERSON and SOI 1 were escorted away from this residence to SOI 1's residence. After the second drug deal ANDERSON and SOI 1 were escorted by two officers in a marked SCMPD vehicle.

SOI 1 was very fearful because it was unknown how the marked police vehicle knew where SOI 1 lived. SOI 1 would later explain the entire incident was a test. According to SOI 1, ANDERSON would later explain that he was being tested in order to see what type of person he/she was. SOI 1 was being offered membership into the organization. SOI 1 denied the request due to fear of working with law enforcement officers.

It should be noted that Malik KHAALIS was a part of the investigation from the beginning and in fact volunteered to assist this Agent from the beginning. KHAALIS was present during the initial interviews with SOI 1 and he was aware of all the information provided by SOI 1.

SOI 1 provided information on an "officer" believed to be a POST certified police officer with Savannah- Chatham Metro. The officer was said to have a brother who held the rank of "sergeant" within Savannah Metro. SOI 1 admitted to being present as the officer sold a large amount of cocaine on two occasions to Percy ANDERSON aka PIG/PIGGY. SOI 1 was able to observe an older black male wearing a police uniform exit the residence during the time ANDERSON was purchasing drugs

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from the residence. SOI 1 said multiple ounces of cocaine were purchased from this “officer” on two occasions. SOI 1 admitted to being with ANDERSON inside the vehicle as they drove around the Savannah area and was being escorted by at least one marked police vehicle after making the cocaine purchases. SOI 1 also mentioned seeing a second black male who was also wearing a police uniform at the residence. SOI 1 said it was a black male but was only able to get a small glimpse of this second officer.

According to SOI 1, once the cocaine was purchased a marked police would arrive shortly after and escorted them out of the area. The second officer was seen again after ANDERSON returned to his vehicle and remained inside the vehicle. When they remained in the vehicle and left only when the second officer drove past them and escorted ANDERSON and SOI 1 away from the area.

SOI 1 said this happened on both occasions and even asked ANDERSON why this was happening. According to SOI 1, ANDERSON explained that he worked for a group of police officers who were involved in drug trafficking and this included providing escorts for customers after drugs were purchased. SOI 1 mentioned this particular officer who sold the cocaine to ANDERSON used to work at Coastal State Prison as a corrections officer, when ANDERSON was an inmate at the prison. SOI 1 explained how this particular corrections officer was sneaking drugs into the prison for ANDERSON. SOI 1 then explained that the second officer was related somehow to the former corrections officer. According to SOI 1, this information was coming directly from ANDERSON. ANDERSON was the direct supplier of cocaine for SOI 1. SOI 1 had already admitted to purchasing multiple ounces of cocaine on a daily basis for approximately one year. SOI 1 admitted the drugs were typically purchased/obtained from ANDERSON or Prince Crawford JONES.

SOI 1 went on to say this organization contained police officers who had not been arrested during the “Savannah 11” investigation in the mid to late 1990’s. During the “Savannah 11” investigation eleven police officers were arrested after an FBI sting operation had been conducted. SOI 1 did say other law enforcement officers were involved in this organization, including higher ranking officers from Savannah-Chatham Metropolitan other police departments and corrections officers. These officers had been promoted through the ranks over the years and were now in positions of power, according to SOI 1. SOI 1 said all this information was obtained from ANDERSON himself.

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Based on the information provided by SOI 1, Agents were able to identify James Edward WILLIAMS as the person who SOI 1 was referring to. James WILLIAMS had been the driver of a vehicle on July 28, 2005. During this incident, ANDERSON was a passenger inside the vehicle and was found to be in possession of illegal drugs. ANDERSON was arrested, while James WILLIAMS was cited for a seatbelt violation and released. Refer to CRN (050728194) for further information on this incident.

This incident corroborated the information provided by SOI 1. It showed that ANDERSON and James WILLIAMS did know each other. Agents also discovered James WILLIAMS did in fact live at 1463 East 40th Street. Agents discovered ANDERSON had been incarcerated before the year 2005. Agents also discovered James WILLIAMS worked as a security officer for the Ports authority from September 4, 2007 thru July 25, 2008. The uniforms worn by the security officer are similar to police uniforms. James WILLIAMS did in fact work as a corrections officer at Coastal State Prison from June of 1999 thru September of 2007. James WILLIAMS was a corrections officer at the prison during the times of ANDERSON's incarcerations. All of this information corroborated SOI's 1 story.

On December 2, 2008 KHAALIS along with this Agent met with the warden at Coastal State Prison Warden Ammons. Warden Ammons was informed of the investigation of James WILLIAMS, his alleged illegal activities. Two other people were identified as possibly being involved with James WILLIAMS. One was identified as Glendora BRIDDELL. Agents discovered BRIDDELL was living with James WILLIAMS at the time, which is why she became a suspect. Warden Ammons agreed to assist the CNT in any way possible. Warden Ammons admitted that James WILLIAMS and BRIDDELL were employees at the prison.

On December 3, 2008 a trash pull was conducted based on the information. This took place at 1463 East 40th Street. The trash can was positioned in the rear of the residence next to the alley. Most residences nearby also had trash cans positioned in the same manner. Wednesday morning was the trash day and the trash is picked up from the rear of the residences in the area. KHAALIS retrieved two black trash bags, which were tied in a knot. The trash bags were placed in the rear of a CNT vehicle. This Agent along with KHAALIS searched the contents of the bags at secure location. Trash

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pulls were conducted in order to gain additional information on James WILLIAMS. Mail with the name of James WILLIAMS, a work schedule, empty corner baggies, along with stems and smoked blunts were found inside the trash. This Agent conducted a test on the smoked blunts and it tested positive for marijuana. The stems are believed to be marijuana stems. Each of these items was heat sealed in evidence bags and placed in the property room.

On December 5, 2008 at approximately 1015 hours, KHAALIS along with this Agent met with Warden Ammons, his chief assistant and SOI 1 at Coastal State Prison. SOI 1 was shown a picture of James WILLIAMS and asked if they recognized the person in the picture. SOI 1 quickly smiled and said "that's him". This Agent asked SOI 1 if this was the person they had been referring to as the police officer who sold cocaine to ANDERSON on several occasions. SOI 1 said "YES" without hesitation. The person in the picture was James WILLIAMS. SOI 1 asked if we had been able to identify the head of the drug organization. This Agent explained that we had not been able to but were working on it. SOI 1 said we were on the right track and should be able to locate the others involved in the illegal activities. SOI 1 did tell Agents to be very careful because this organization was very serious and would not surrender freely; adding that they would do whatever had to be done to protect their criminal organization.

SOI 1 admitted, James WILLIAMS had approached him more than once and attempted to speak with him/her while inside Coastal State Prison. Other inmates were always present, which made it difficult for them to speak. Warden Ammons provided this Agent with information on James WILLIAMS.

James WILLIAMS and BRIDDELL had provided the following information to the prison when they were hired on as corrections officers: James WILLIAMS listed 1463 East 40th Street as his home of record. James WILLIAMS also provided several cell and home numbers. One such number was (912-961-1556), a check of the Phoenix system showed Kevin WADE provided that number during an encounter with the police a few years ago.

When working drug investigations it is important to know who the suspect speaks with. One way of discovering this information is to obtain toll data and employment information such as with the information in reference to WADE. Throughout this investigation agents attempted to show not only

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was James WILLIAMS speaking with known convicted drug dealers, so were others. This includes persons suspected of illegal activities. It goes against a law enforcement officer code of ethics to have personal relationships with known or suspected criminals.

WADE is currently awaiting trial on trafficking and other felony drugs. WADE was arrested back in 2005 by the CNT during a Title III investigation. The word "brother" had been written next to the phone number. It appears James WILLIAMS and WADE may be of some relation. Warden Ammons also explained how a second number (912-231-8834) provided by James WILLIAMS was checked and discovered Elijah SAMS also provided that number. SAMS is currently an inmate at Coastal prison. SAMS has multiple arrests for drug related offenses. SAMS is the cousin of Clarence George BETTERSON.

The chief deputy explained how he had worked with Darwin WILLIAMS (a brother) of James WILLIAMS at a separate prison and how he had been suspected of illegal activities as a corrections officer. DARWIN was now a probation officer in the Albany area. The chief deputy also told this Agent, James WILLIAMS associated with Sgt. Demetrius OLIVER, who also worked in the prison. Warden Ammons explained how James WILLIAMS and BRIDDELL had inmate contacts within the prison system. As corrections officers, you are not allowed to have personal relationships with criminals. This is especially true for past or present prison inmates. In the case of James WILLIAMS, he actually named convicted drug dealers as contacts of his.

On December 10, 2008 at approximately 0415 hours, KHAALIS along with this Agent conducted a trash pull at 1463 East 40th Street. This was the second trash pull conducted at this residence in as many weeks. Agents arrived at the residence at approximately 0415 hours and observed the trash can positioned at the rear of the residence just as it was the previous week.

The trash can was positioned directly behind the residence just like the other trash cans on the block. KHAALIS retrieved a single black colored plastic bag from inside the trash can. The bag had been tied in a knot and was placed inside a CNT vehicle. The bag was transported to a location where it was later searched by this Agent in the presence of Lt. Smith. Smoked blunts, plastic baggies and paperwork in BRIDDELL's name were found. This Agent conducted a field test on the smoked blunt

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and it tested positive for marijuana. Each of the items were heat sealed in evidence bags and were placed in the property room.

During the week of January 10, 2009, this Agent received information from Agent Lupus regarding the toll information obtained for James WILLIAMS (912-675-6058). Agent Lupus checked the numbers on the tolls and discovered two specific numbers stood out. The numbers stood out because they were being contacted by multiple known drug dealers. The numbers were (912-272-6461 and 912-412-4859). Kenneth EMMERSON-SMITH, Shawn MARCH, Dwon MOULTRIE and Jawyann PRINGLE had at some point connected the number (272-6461) before they had been arrested. These four persons have lengthy arrest records ranging from simple possession to trafficking cocaine.

Derrick BROWN, David HUDSON, Dijon MCCALL and Freddie POPE had previously called the number (912-412-4859). These persons have also been arrested on numerous felony drug charges. Based on the first tolls for James WILLIAMS' cell phone (912-675-6058), James WILLIAMS had called both numbers. The tolls were dated from October 8, 2008 through November 28, 2008. Three outgoing calls were made from James WILLIAMS' cell phone to (912-272-6461), no calls were incoming from this number. A single outgoing call from James WILLIAMS' cell phone was made to (912-412-4859) was also made. This basically shows that James WILLIAMS was calling these numbers.

This Agent requested subscriber and toll information on both numbers via the DEA. According to Agent Lupus, the person using the number (912-272-6461) goes by the name of (WOFFE). This Agent spoke with KHAALIS in reference to "WOFFE". KHAALIS said he was familiar with someone who used that street name. This person was identified as Thomas LAWTON. According to KHAALIS, LAWTON was known as a mid-level drug dealer. This Agent requested subscriber information on both numbers. The person using the number (912-412-4859) goes by the name (JOHN J and LIL BRU).

During the month of January, 2009, the Major Case unit of the CNT had a meeting in which each agent was supposed to bring forth their largest cases/targets so that the unit would work the individuals as a group. KHAALIS has had open cases on high quality drug targets. Yet, KHAALIS

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did not mention Lenardo MCMILLAR, he instead mentioned a couple of smaller dealers in the area. None of which were associated with MCMILLAR. This seemed odd since MCMILLAR is a huge target in this area and KHAALIS was supposedly investigating MCMILLAR and his cohorts for years.

Another reason for Lt. Smith wanting to know who agents were targeting was for the intelligence unit to keep track of everyone's target. This would prevent agents from duplicating targets. MCMILLAR has many people in his organization and was a bigger target than other targets named at the meeting. Again, KHAALIS did not mention MCMILLAR. Later during the investigation SOI 1 provided additional information on MCMILLAR and his organization. Many of the members of this group were listed as targets of KHAALIS.

In February 2009, the Major Case Unit had another meeting at the request of Lt. Smith. Lt. Smith informed everyone on the team at the time an investigation was underway and the targets were James WILLIAMS and Willet WILLIAMS. Willet WILLIAMS is a police officer with Savannah Metro and is currently assigned to Precinct 2. KHAALIS was again present for this briefing. KHAALIS knew SOI 1 was alleging both were involved with a large drug distribution organization. KHAALIS was aware Willet WILLIAMS was a target even before this briefing and at no time did he mention having a personal or professional relationship with Willet WILLIAMS. During the meeting, team members were told the case was very sensitive and not to discuss it with anyone. The team discussed possible investigative techniques and what had been done to date. KHAALIS at no time made any mention to knowing Willet WILLIAMS.

On February 17, 2009 Agent M. Delatorre along with this Agent met with SOI 1 in a secure location. This meeting was in reference to obtaining additional information from the SOI. SOI 1 was very afraid during the meeting. SOI 1 mentioned that additional information had been obtained from ANDERSON. SOI 1 mentioned the last meeting which took place on January 12, 2009. SOI 1 found it suspicious that a few weeks after the meeting he/she had been moved to Smith Prison in Glenville.

A day or so after SOI 1 had been moved to Smith Prison, Warden Ammons contacted this Agent. The warden explained that he had no idea SOI 1 was going to be moved and didn't even know where SOI

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I had been moved to. Warden Ammons explained he should have been notified before an inmate is transferred from his prison. Warden Ammons could not understand or explain how the transfer took place and it took him days to find out. This Agent was able to get SOI 1 transferred to the Chatham County Jail with the assistance of the defense attorney. This took a while to work out the details.

According to SOI 1, ANDERSON explained how the organization had grown and a person could no longer purchase ounces of cocaine or marijuana from them. A person would have to purchase at least one kilogram of cocaine or one pound of marijuana before anyone in the organization would deal with them. A single kilogram of cocaine now costs \$32,000 and a pound of "baby purp" marijuana costs \$6,000-\$8,000 per pound. SOI 1 explained how drugs were being brought into the prison by James WILLIAMS and his cohorts. SOI 1 believed that as much as two kilograms of cocaine was being brought into Coastal State Prison possibly on a weekly basis. SOI 1 came to that conclusion based on how many inmates are believed to be using drugs inside the prison.

The drugs were being smuggled into the prison inside paint cans. The paint cans containing the drugs were placed in the bottom of the buggies. If the paint cans were opened the drugs would not be discovered because the cans contained paint. The drugs were placed in plastic bags and would only be found if someone placed their hands inside the cans. This Agent remembers hearing warden Ammons explain how easy it would be for James WILLIAMS to sneak drugs or other contraband into the prison since he worked at the rear gate. ANDERSON was the person inside the prison who was responsible for selling the drugs for the organization inside the prison. Again SOI 1 received this information was obtained from ANDERSON.

When SOI 1 began providing information on a police officer this Agent noticed the SOI was tearing as he/she spoke. SOI 1 was also visibly shaking and the muscles in his/her neck were convulsing. This Agent could tell SOI 1 was very frightened. SOI 1 said the officer he/she had previously discussed as being involved in the drug organization could now be identified because SOI 1 had seen this officer on television. This Agent believed SOI 1 was referring to Willet WILLIAMS. SOI 1 said this particular officer was involved with the "Savannah Eleven" in the 1990's.

SOI 1 explained that this officer and others were never arrested or charged during the investigation

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and they never stopped their illegal activities. SOI 1 said this particular officer and his cohorts have been selling multiple kilograms of cocaine for over ten years and was very organized. SOI 1 explained how these officers are now high in rank within the police department and have a lot of authority. SOI 1 told Agents to be very careful because multiple police officers from various law enforcement agencies were a part of the organization and if cornered would most likely resist with force. SOI 1 said this information came from ANDERSON himself.

SOI 1 was too afraid to say anything further about the officer in question. SOI 1 said Agents would have to set up a meeting with the defense attorney and the District Attorney before any additional information would be provided on the police officer.

After the interview with SOI 1, this Agent was provided with a copy of the toll data Agent Lupus had been working on for the past few weeks. The data consisted of the phone numbers associated with the number (912-272-6461). This phone is being used by LAWTON. Agent Lupus was able to identify possible users of the numbers coming in contact with LAWTON's cell phone. One name which immediately caught this Agent's attention was the name Billy Leron MEDLOCK. Billy MEDLOCK SR. was part of the Savannah eleven and received federal jail time. MEDLOCK SR. is a prior employee of Savannah Metro. Billy Leron MEDLOCK is his son and he has a criminal history with arrests for armed robbery on two separate occasions, theft by receiving on two separate occasions, and other misdemeanor arrests. MEDLOCK was last arrested on December 31, 2008 and provided the police with a number of 912-220-6314. This is the number which has come in contact with LAWTON.

A second person of interest who is speaking with LAWTON is Walter Terry MOON, DOB 12-30-1980. MOON is currently being held at the Chatham County Detention Center, he was arrested on January 14, 2009. MOON has been arrested in the past for robbery, probation violations, possession of a firearm by a convicted felon, possession of marijuana and controlled substances with intent to distribute, sale of controlled substance, aggravated assault on two separate occasions and possession of tools. Right away this Agent had discovered LAWTON spoke and dealt with known drug dealers and violent offenders.

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On February 18, 2009, Agent M. Delatorre, ADA J. Rothschild, DA D. Burns and this Agent met with the SOI 1 at a secure location. ADA Rothschild in particular wanted a thorough summary of everything SOI 1 had provided in the past. SOI 1 briefed everyone present on how ANDERSON was able to trust SOI 1. Both ANDERSON and SOI 1 met at a halfway house after being released from prison. They became friends and SOI 1 soon began purchasing multiple ounces of crack and powder cocaine from ANDERSON.

SOI 1 explained how the first drug buy took place at 1463 East 40th Street. SOI 1 explained that ANDERSON was driving and pulled into the driveway of the residence. SOI 1 explained described a black male wearing a police uniform was seen for a brief moment when they first arrived. SOI 1 remembers ANDERSON entered the residence and SOI 1 became afraid thinking a set up had taken place. ANDERSON soon exited the residence and a second black male exited the residence also wearing a police type uniform. ANDERSON and the second black male spoke briefly.

When ANDERSON entered the vehicle he was holding at least a quarter of a kilogram of cocaine. SOI 1 admitted to purchasing at least half an ounce of cocaine from ANDERSON. SOI 1 yelled at ANDERSON asking why the police were around and if a set up had taken place. According to SOI 1, ANDERSON explained that he worked for the officer by selling drugs for them and not to worry. SOI 1 was still upset and told ANDERSON to leave. ANDERSON told SOI 1 they could not leave at that time. A minute or so later a marked police vehicle posted on the residence and ANDERSON said they could now leave.

SOI 1 remembered the driver of this marked vehicle was the same person observed when they first parked in the driveway. This time a second police officer was inside the vehicle. SOI 1 was later shown multiple pictures of police officers in uniform, one of which just happened to be of Officer SAWYER. The pictures had been selected at random and had been obtained by Capt. McBurney. SOI 1 looked at the picture and said something to the effect of "this looks just like the guy from the second buy". Up until this point SAWYER had not been mentioned nor was he suspected as being part of illegal activities. It should be noted that SAWYER had been assigned to Central Precinct which covers the area where James WILLIAMS lived. SOI 1 was not one hundred percent because of the length of time which had past. SOI 1 wanted to be careful and not accuse the wrong person but

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was almost positive of SAWYER being present during the second drug purchase. ANDERSON followed the marked police vehicle until it drove past SOI 1's residence and then kept going. SOI 1 remembered being afraid because the officer already knew where to go and they were following the police vehicle.

SOI 1 said the second cocaine purchase happened very much like the first. ANDERSON parked in the driveway and entered the residence. A short time later ANDERSON entered the vehicle with multiple ounces of cocaine. They remained at the residence until a marked police vehicle drove past. SOI 1 said the same black male officer from the first drug buy was driving and this time a second black male officer was inside the vehicle. Again, they were escorted by the police vehicle. SOI 1 said this organization was selling high grade marijuana, cocaine and ecstasy pills in large amounts. SOI 1 remembered seeing this same officer inside a gas station at Victory and Waters Avenue. The officer was wearing a police uniform and the two said hello to each other. SOI 1 said he/she was always afraid of the officers, which was the reason he/she decided not to join the organization when asked by ANDERSON.

SOI 1 began discussing how, one day while watching the television with ANDERSON and others in Coastal. This was a day or before the presidential inauguration and they were watching the news. SOI 1 watched as police officers were boarding buses and loading luggage. SOI 1 saw a black male wearing a blue warm up type outfit and recognized this person as the same person who had escorted them after the two drug purchases from 1463 East 40th Street.

At the same time Willet WILLIAMS was being shown on television, ANDERSON elbowed SOI 1 but did not say anything at the time. A minute or so later when they were away from the others watching television and ANDERSON said something to the effect of "you know that's Sgt. WILLIAMS, the guy I work for". ANDERSON had just provided a name identifying the police officer who provided SOI 1 and ANDERSON with an escort after purchasing cocaine from James WILLIAMS.

This Agent was present on the day in question and did notice the media was present filming officers loading the buses before departing the Oglethorpe mall. Willet WILLIAMS was present on this day

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and was wearing an outfit like SOI 1 had described. Willet WILLIAMS holds the rank of Star Corporal, which is a supervisor's position. The rank is very similar to the rank of Sergeant. Willet WILLIAMS has been an employee of Savannah Metro since the early 1990's. Willet WILLIAMS was an employee during the Savannah eleven investigations.

Willet WILLIAMS is the brother of James WILLIAMS. Willet and James WILLIAMS have contacted each other via cell phone often. This was discovered after checking the first tolls from October 8-November 28, 2008. A check of the Tiburon system shows Willet WILLIAMS provided a phone number of 912-844-8991 during an accident investigation. This Agent showed several pictures of black police officers in uniform. SOI 1 showed no interest until the fourth picture of Willet WILLIAMS was seen. SOI 1 was pretty certain Willet WILLIAMS was the person viewed on television. SOI 1 requested the video of the broadcast in order to be one hundred percent positive. It should be noted that SOI 1 was always cautious when providing information or looking at pictures. SOI 1 knew the case was very sensitive and did not want to provide any information unless he/she was certain it was accurate. This was something this Agent appreciated because often time's informants or cooperating defendants will try and deceive police officers in order to improve their situation. Agents attempted to obtain a copy of the video broadcast but were unable to obtain a copy.

It should be noted that although inadmissible, the SOI was given two polygraph tests by retired Chatham County police Major Freeman. SOI 1 passed both polygraph examinations.

This Agent applied for a Pen Register and Trap and Trace on February 20, 2009, based on the information received. The request was granted by Judge Karpf on March 6, 2009. The Pen Register became active on March 9, 2009. KHAALIS was well aware of the Pen Register and did have access to the information at any time. The Pen Register was up and running for (60) days. During this time James WILLIAMS was using the phone regularly. Towards the end of the (60) days, Lt. Smith decided to conduct a surveillance operation.

On April 16, 2009 at approximately 1530 hours, Agents began conducting surveillance at Coastal State Prison. This surveillance was unanticipated and was announced by Lt. Smith at approximately 1500 hours to the agents participating. Agents Guyer, M. Delatorre, Roshi Smith, Desautels,

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KHAALIS along with this Agent were present for the surveillance operation. In the weeks prior this surveillance date, there was no mention or activity involved in this investigation, which is why Lt. Smith decided to conduct surveillance.

Agents planned on following James WILLIAMS from the prison in order to observe his activities. Somewhere around 1630 hours KHAALIS, while parked at Coastal State Prison, requested permission to contact Willet WILLIAMS and inquire about his brother James WILLIAMS and when he would get off from work. This Agent denied the request because it did not seem logical for KHAALIS to call and ask about James WILLIAMS at all. Again, KHAALIS never told this Agent he had any relationship with Willet WILLIAMS. So why would KHAALIS offer to contact a known target and inquire about Willet WILLIAMS brother James WILLIAMS. This is not a routine investigative tool and it made no sense until later in the investigation. It was not until the month of May that it was discovered KHAALIS had in fact contacted Willet WILLIAMS multiple times before James WILLIAMS left work. This was obtained from toll records on James WILLIAMS', KHAALIS' and Willet WILLIAMS cell phone. The toll records were not obtained until May of 2009.

James WILLIAMS left the prison at approximately 1730 hours and Agents followed. James WILLIAMS arrived at his residence at approximately 1755 hours and entered his residence. James WILLIAMS did not make any stops on his way home. It should be noted that Warden Ammons later explained to this Agent it was not normal for someone to remain at work after the shift ended. This was unless the corrections officer was going to work overtime, which consisted of at least a four hour shift. James WILLIAMS should have ended his shift between the hours of 1600 and 1630 hours.

According to toll records we received in May, Willet WILLIAMS had contacted KHAALIS at approximately 1706 hours. Within the next few minutes around 6 different phone calls were made between KHAALIS and Willet WILLIAMS. Out of the 6 different phone calls, approximately 2-3 of the calls were over one minute in length, meaning a conversation occurred. It only takes a few seconds to make a very brief statement to someone and then hang up. As stated in the previous paragraph at around 1730 hours James WILLIAMS finally left Coastal State Prison and drove home. It is believed KHAALIS informed Willet WILLIAMS the CNT were going to follow James WILLIAMS from work.

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At approximately 1825 hours, James WILLIAMS walked outside of the residence and began actively looking around as he spoke on the phone. Agent M. Delatorre was the closest Agent to the residence and was parked facing the side of the residence, facing Bee Road. Agent M. Delatorre reported James WILLIAMS walked to edge of his driveway on Bee Road and looked down each street as if he were looking for something. James WILLIAMS was on his cell phone at the time. Other CNT Agents were parked in the surrounding blocks and were not visible to James WILLIAMS.

A check of the Pen Order on James WILLIAMS' telephone and toll records of Willet WILLIAMS, show James WILLIAMS and Willet WILLIAMS were speaking at the exact same time James WILLIAMS was outside. Within a few minutes after James WILLIAMS exited the residence a marked police vehicle slowly drove past Agent M. Delatorre as if looking for something.

According to Agent M. Delatorre, the officer was a black male who wore glasses and was driving vehicle number (4984). The officer drove past and looked at the Agent while driving slowly. By this time James WILLIAMS was out of sight. Agent M. Delatorre later told this Agent, "I immediately felt chills going down my spine and felt for my safety at that time due to the marked unit. I felt we were compromised for sure at that point".

At approximately 1843 hours, James WILLIAMS exited the residence again briefly, looking around, and then re-enters the residence. At 1847 hours, James WILLIAMS backs out of the garage and heads north on Bee Road. At the same time the same marked police vehicle drove past Agent M. Delatorre for a second time. It seems suspicious the marked police vehicle drove past Agent M. Delatorre both times James WILLIAMS exited his residence. Agent M. Delatorre remained at the residence as other Agents followed James WILLIAMS away from the residence.

James WILLIAMS drove to a shopping center on Wallin and Victory Drive. James WILLIAMS parked his vehicle and entered the Dollar General Store. At 1852 hours Agent M. Delatorre reported seeing a white colored, 4-door vehicle arrive and pull into the garage. This vehicle is believed to belong to Willet WILLIAMS based on the fact that he owns a vehicle similar to this. Agents believe Willet WILLIAMS arrived at the residence once James WILLIAMS left in order to secure illegal

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drugs and contraband from the residence. James WILLIAMS exited the Dollar General Store after a short time and carried a bag in his hands. James WILLIAMS then entered the Kroger Grocery Store. James WILLIAMS exited this store a few minutes later carrying another bag.

James WILLIAMS then drove to a different shopping center on Skidaway and Victory Drive. Agents believe James WILLIAMS entered the CVS Store. James WILLIAMS soon exited the store and enters his vehicle. James WILLIAMS arrived at his residence at approximately 1922 hours and entered the second garage door. It should be mentioned that the garage doors are quickly closed when opened. The surveillance operation was shut down at this time. At the conclusion of the surveillance, this Agent and others involved in the surveillance felt like the surveillance operation had somehow been compromised. This was supported by the obvious change in behavior during the surveillance by James WILLIAMS. It was because of this agreement between participating agents of the surveillance that the surveillance had been compromised that agents hurried back to the CNT office to determine who James WILLIAMS had been speaking to while he was outside. Agents later discovered James WILLIAMS was talking to Willet WILLIAMS while he was outside looking around and when the marked police vehicle first drove past Agent M. Delatorre. This was determined by checking the toll records and the call times, based on the times these incidents took place.

Lt. Smith was informed of the surveillance operation results and as a result he asked for assistance from Sgt. Lupus. Sgt. Lupus is a current supervisor in Central Precinct. Sgt. Lupus was asked to provide the name of the officer who drove past Agent M. Delatorre. The only information later obtained is that the marked patrol vehicle was not assigned to a patrol function in that area.

It should be noted that KHAALIS specifically asked this Agent a day after the surveillance operation if a toll request would be sought for Willet WILLIAMS cell phone. This Agent told KHAALIS, a toll request had already been requested but Lt. Smith had denied the request for Willet WILLIAMS cell phone due to him being a police officer. Lt. Smith wanted additional evidence before requesting the toll records on Willet WILLIAMS cell phone. This Agent did not think anything of this question since KHAALIS was assisting with the investigation to this point. It is believed that KHAALIS made no mention about having contact with Willet WILLIAMS on the day of the surveillance operation because the denied request by Lt. Smith. In other words KHAALIS felt safe because he was informed

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tolls would not be requested on Willet WILLIAMS cell phone. It should be mentioned that KHAALIS had still not informed this Agent he had spoken with Willet WILLIAMS on the day of the surveillance. KHAALIS' involvement was not known until tolls on Willet WILLIAMS cell phone number 912-844-8991 were received in the month of May 2009 after a toll request was made due to the suspicious activity on April 16th.

This Agent informed TFO Broome of the request denial for Willet WILLIAMS phone and he requested the data via the DEA. This incident took place immediately following the surveillance operation. Once the toll data was received up until April 15th, it was realized that KHAALIS had been withholding information and was possibly a suspect himself as he had several telephone contacts with Willet WILLIAMS which were not mentioned to this Agent or Lt. Smith.

It is not suspicious for two officer's to speak with one another, however, it was very suspicious that KHAALIS was talking to Willet WILLIAMS after having knowledge that he was target of an criminal investigation, that he did not notify anyone of his interaction with Willet WILLIAMS, and specifically asking if a pen or toll information would be obtained on Willet WILLIAMS cell phone. KHAALIS should not have had any contact with WILLET during the surveillance operation.

Upon seeing the initial set of tolls from Willet WILLIAMS cell phone, the alerted behavior by James WILLIAMS on April 16th things began to make more sense. At that time this Agent, Agent M. Delatorre, TFO Broome and S/A Sarhatt felt that the call detail records and the suspicious behavior by KHAALIS during the weeks following the investigation suggested KHAALIS and Willet WILLIAMS compromised the investigation. KHAALIS was never made aware of the toll request or results for Willet WILLIAMS cell phone. After observing KHAALIS' CNT telephone number (912-547-1232) on Willet WILLIAMS tolls, TFO Broome requested a second set of tolls, to include April 16th, specifically to see if KHAALIS' cell phone number showed up on Willet WILLIAMS tolls for April 16, 2010.

Once the tolls arrived, agents observed that not only did KHAALIS and Willet WILLIAMS have contact on April 16th as anticipated, but they had contact on April 16th while KHAALIS was participating in the surveillance of James WILLIAMS at Coastal State Prison. KHAALIS was

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actually parked at the prison waiting on James WILLIAMS to leave when these calls took place. KHAALIS was the closest Agent to James WILLIAMS until he left work.

During the month of May, toll analysis of Willet WILLIAMS cell phone number (912) 844-8991 from March 16, 2009 to April 15, 2009 showed that KHAALIS, utilizing his CNT cellular telephone (912) 547-1232, contacted Willet WILLIAMS approximately 8 times throughout that time frame. TFO Broome requested toll information on Willet WILLIAMS cell phone (912) 844-8991 from April 15, 2009 to May 05, 2009 (the date of the request). Toll analysis showed that on April 16, 2009 (the date of the surveillance on James WILLIAMS) Agent KHAALIS and Willet WILLIAMS contacted each other 7 times between 1706 hours and 1713 hours.

At that time, KHAALIS was at Coastal State Prison conducting surveillance on James WILLIAMS, Willet WILLIAMS brother. Toll analysis also shows that 3 minutes after Willet WILLIAMS last call with KHAALIS, Willet WILLIAMS and CNT Agent R. GERIDO utilizing CNT cellular telephone (912) 547-1155 contacted each other 6 times between 1716 hours 1742 hours. Toll analysis also shows that James WILLIAMS and Willet WILLIAMS contacted each other 3 times at the exact same time that James WILLIAMS exited his residence looking up and down the streets near his residence. Toll analysis also showed that time KHAALIS and GERIDO also had contact during the time of the surveillance. This led Agent's to believe Gerido may have been involved with KHAALIS and Willet WILLIAMS.

On June 16, 2009 KHAALIS' cell phone (912-547-1232) had contact with 912-844-8991 Willet WILLIAMS cell phone for approximately 4 minutes. This was the only contact since the surveillance of James WILLIAMS by KHAALIS. This lag in contact time only furthered agents' belief that KHAALIS had compromised the investigation by alerting Willet WILLIAMS, who in turn alerted James WILLIAMS. KHAALIS and Willet WILLIAMS avoided contact with one another to avoid drawing attention to each other.

Between May and June of 2009, TFO Broome requests and obtains Trap and Trace (Pen Orders) for James WILLIAMS' personal telephone, Willet WILLIAMS two personal telephones, Rodney GERIDOS CNT telephone, KHAALIS' personal telephone and KHAALIS' CNT telephone. TFO

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Broome later obtains a Pen Order for Willet WILLIAMS SCMPD work telephone. All pen orders were federally obtained and authorized by the Honorable G.R. Smith of the Southern District of Georgia. These Pen orders were renewed and maintained for approximately 12 months.

During the year of Pen analysis, TFO Broome received numerous “hits” from DEA entities which showed multiple calls to numbers associated to other drug investigations throughout the US. These calls were made to known drug trafficking organization’s not only based in the United States but also in Mexico. Some of the numbers called were part of active DEA cases. CNT databases also showed a link from the different phone numbers to multiple numbers associated with drug organizations and individuals in the Savannah area. All Pen data and subscriber lists are available for analysis. Some of these calls were made from personal cell phones as well as work cell phones.

This Agent had been assigned to the DEA office in order to continue with the investigation. One thing the DEA felt had to be done was for CNT agents to believe the investigation had ended. This was especially true once it was discovered KHAALIS was a suspect. Lt. Smith was aware this Agent had been sent to the DEA to assist in the investigation. It was decided this Agent would type numerous “false” DEA reports. The reports would be in reference to this Agent making numerous drug purchases in various rural areas of Georgia. The reports stated this Agent had been working in an undercover capacity, working cases not associated with the James WILLIAMS and WILLET investigation.

This Agent placed many of these reports on top of the desk at CNT, knowing Lt. Smith would see the reports and question them. This was done when numerous CNT agents present. When Lt. Smith came by the desk he noticed the reports and began to question the reason for the drug purchases. The key was this was done in the presence of other CNT agents. This Agent informed Lt. Smith the DEA numerous drug purchases had been done in order to assist with a DEA investigation of a Hispanic drug organization hours away from the Savannah area. This Agent added that this group had nothing to do with the James WILLIAMS and Willet WILLIAMS investigation. Lt. Smith announced he was displeased with this Agent working a different case. This Agent announced the James WILLIAMS and Willet WILLIAMS investigation had “died out” and nothing was happening with it. The plan worked because agents such as Roshi Smith began discussing this with multiple agents at CNT. It

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was not long before other CNT agents were asking this Agent questions about the “fake” new case.

This Agent was sent back to the CNT on July 04, 2009. This was just another thing done in order to make it appear the entire case had “died down” and was no longer being investigated. KHAALIS was aware this Agent had been assigned to the DEA to actively work the case. Upon returning to the CNT, KHAALIS frequently asked this Agent for any and all updates on the investigation. This Agent had been instructed to let people know the case was no longer being worked since no new information had been obtained. This was exactly what this Agent told KHAALIS when he asked for updates.

It should be noted that KHAALIS had been named as part of a group of former CNT agents who were stealing money and drugs from local drug dealers in 2003-2004. An investigation had been conducted by the FBI but they were unable to find enough evidence to charge anyone. This was not the only time KHAALIS’ name was mentioned as being involved with illegal activities as a CNT agent.

Sometime in 2008, two CNT agents provided information to a federal agency in reference to KHAALIS. The agents explained an incident where they had signed up a confidential informant who planned on making drug purchases from someone associated to KHAALIS’ soon to be ex wife at the time. KHAALIS was aware of the identity of this informant along with the two CNT agents who signed up the informant.

When an informant is signed up, their identities are protected by the controlling agents. Informants are not known by a name, they are assigned a number. Informants are referred in reports by their number only. KHAALIS was one of the few who knew this number along with who the informant planned on purchasing drugs from. Within a day or two after being signed up, the informant was approached by a target and identified as an informant for the CNT. When the informant attempted to deny any involvement with law enforcement, the target referred to the informant by their informant number. The target added that “little fifty” had told him about the informant working for the police. This is a street name KHAALIS has been known to use in the past. The informant told the controlling agents. The agents were concerned enough to inform this particular federal agency they believed

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KHAALIS was involved with illegal activities. The agents did not wish to be identified by name for their safety.

This Agent received an injury which required months of therapy in mid July 2009. In mid August, this Agent secretly began working at the DEA office. This was done in order to keep KHAALIS and others from discovering the case was still ongoing. The only people at CNT who were aware of this were Commander Harris, Lt. Smith and Agent M. Delatorre. The injury acted as a cover in order for KHAALIS to feel at ease.

On July 14, 2009 agents discovered during a meeting with the AUSA James WILLIAMS Durham that on June 22, 2009 Willet WILLIAMS and KHAALIS's girlfriend/future wife (Nicole Lovett) both had their credit checked by AT&T. It was believed KHAALIS and Willet WILLIAMS were attempting to change cell phone providers and/or cell phone numbers.

Another incident which made agents of the CNT, DEA, and FBI suspicious of KHAALIS was when KHAALIS refused to assist the FBI in an investigation without knowing the identity of FBI confidential informant (CI). CNT agents have assisted other agencies in the past without knowing the CI identity and KHAALIS was well aware of this fact. This investigation was later worked by a different CNT agent who worked the case as originally planned. This occurred sometime in 2009. (The exact date can be discovered if needed).

After secretly working at the DEA, for a few months this Agent returned to the CNT in order to observe KHAALIS. It was around this time Agent Epley began working a Title III investigation on Tamir BLACKSHEAR and his organization. This Agent was sent back in order to observe and report any suspicious activities by KHAALIS. While the Title III was being worked, Agent M. Delatorre was getting ready for his Title III investigation to begin. Agent Epley's case ended in late November of 2009. Agent M. Delatorre began his Title III investigation in early December of 2009.

On November 9, 2009 at approximately 1303 hours, this Agent was in the wire room at the CNT office along with KHAALIS. A cell phone began to ring and KHAALIS looked at his phone and said "this is WILLET" and answered the phone. This Agent continued to look at the computer monitor and not pay

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any attention to KHAALIS. KHAALIS was then over heard saying something to the effect of "I haven't been able to do that, we've been busy". KHAALIS then got quiet for a few seconds and then exited the room where he continued his telephone conversation outside of the building. This Agent could hear KHAALIS speaking outside of the room but was unable to understand the content of the conversation.

A check of the pen register on Willet WILLIAMS cell phone (912-844-8991) revealed an outgoing call from Willet WILLIAMS to KHAALIS on (912)547-1232. This call lasted 2 minutes and 16 seconds. This call was placed shortly after Willet WILLIAMS sent KHAALIS a text message utilizing the same numbers.

For the most part KHAALIS did not do anything out of the ordinary during Agent Epley's Title III case. KHAALIS had been aware of the case Agent M. Delatorre had been working. The main targets of this case were Hezekiah MURDOCK and Joshua VARNER aka SCREW. Agent M. Delatorre had run into several problems with this case. On numerous occasions MURDOCK, but specifically VARNER, would "drop" his cell phone whenever a new Pen Register was obtained. KHAALIS was aware each time a new Pen Register had been granted. Even though KHAALIS was a suspect, no one else at the CNT was aware and therefore KHAALIS had access to any updates in this investigation.

KHAALIS had even attempted more than once to obtain information on different targets associated with MURDOCK. This was done by KHAALIS requesting intelligence reports from Agents Wood, Kovach and Wheelless, who were assigned to the intelligence unit at the time. This Agent was told this information by Agent M. Delatorre, who had received this from Agent Wood. Apparently, KHAALIS requested information on Deantay SMALLS from WOOD, Kovach and Wheelless at separate times. The three of them mentioned to each other that KHAALIS had approached each of them requesting this information. For example when KHAALIS requested the information on SMALLS from Agent Wood and did not receive anything, KHAALIS would then request the same information from Kovach and then Wheelless. It was not until the three of them discussed this with each other that they realized KHAALIS had done the same thing with other targets associated with MURDOCK and VARNER.

Agent Wood informed Agent M. Delatorre, who was the case agent for the investigation. Agent

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Wood along with every other CNT agent is aware that during an investigation, the case agent or co-case agent are the only ones who are to obtain pertinent information on their targets. KHAALIS had been assigned to the CNT for over 6 years and was well aware of this. Agents Wood and Agent M. Delatorre informed Lt. Smith of KHAALIS' actions. Agent Wood was told not to provide KHAALIS with any information in reference to the MURDOCK investigation. KHAALIS was aware VARNER was a possible target but it was "downplayed". Lt. Smith then questioned KHAALIS in reference to his actions. According to Lt. Smith, KHAALIS could not provide an explanation on why he had requested information on targets of the MURDOCK investigation.

Everyone in the major case unit was aware a Title III had been granted for MURDOCK's cell phone. The DEA, who were assisting in the investigation decided not to inform everyone involved a Title III on VARNER's cell phone was in the works. The reason had been because VARNER had already dropped his cell phone when Pen Register Orders had been signed months earlier. People were now led to believe nothing could be done with VARNER since his cell phone had been "dropped" in the past.

On December 20, 2009 at approximately 0205 hours, Leonardo MCMILLAR was arrested by GSP and the Garden City Police Department. MCMILLAR, who according to other sources have said was a large scale cocaine dealer. In the early morning hours of December 20 2010, CNT Agent Epley received a telephone call from KHAALIS asking for details of the stop involving MCMILLAR. (Agent Epley is a Garden City officer and was in the wire room at the time of the call) TFO Broome looked at the tolls and observed that KHAALIS was contacted by Kenneth Gibbons, a "bounty hunter/CI" in the middle of the night on December 20th. KHAALIS and Agent Epley responded to the Garden City Police Department and obtained the cell phones which were seized from MCMILLAR. KHAALIS took possession of the cell phones, keeping them on his person at all times, even when alone. KHAALIS did not log the phones into evidence at that time. KHAALIS instead applied for and obtained a warrant for the contents of the cell phones.

However, Agent Wood stated that the cell phones were out of their evidence bags and sitting on KHAALIS' desk when he obtained the phones from KHAALIS to be downloaded. TFO Broome ordered tolls on the phones for comparison with the content of the phones. However, call history is

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not downloaded, only the telephone numbers/contacts. Thus, if the call history had been altered by KHAALIS, TFO Broome would not have the information from the telephones for comparison, only the tolls from MCMILLAR. A comparison can be made at a later date if the seized telephones are obtained.

It should be noted that SOI 1 had provided TFO Broome with additional information on the organization. SOI 1 named MCMILLAR as the head of the organization and he had numerous persons who sold drugs for him. This included Prince Crawford JONES, who KHAALIS had reported years earlier, was a target of his. MCMILLAR was also a "target" of KHAALIS'. Since KHAALIS had identified them both as a target of his, he would be the only agent to receive additional information on them. If another agent obtained information on either of them they would have to inform KHAALIS. The CNT has received information on both and has attempted to make cases on JONES and MCMILLAR. KHAALIS was aware of these cases and each failed to be productive. Agent Halford attempted to work a case on MCMILLAR, which KHAALIS assisted with and it also failed to be productive. KHAALIS listed multiple persons associated with MCMILLAR's organization as his targets. People such as James WILLIAMS, KENNEDY, Bryan THOMSON and Jaudon MCKAY are involved with MCMILLAR. TFO Broome attempted to work this organization by making controlled drug purchases with SOI 1 but things never seemed to work out.

Another target of KHAALIS' was Josh VARNER himself. During the MURDOCK investigation, things took place which were odd at the time but could not be fully explained. VARNER dropped his phone no less than three different times. It is common for drug dealers to drop cell phones regularly however; VARNER seemed to have some type of uncanny knowledge of when to drop his cell phone. One thing Agent M. Delatorre did in order to "flush out" the leak in the investigation was to secretly begin intercepting VARNER's cell phone at the DEA office. This was done for a few weeks and then the VARNER cell phone was transferred over to CNT. The DEA, Commander Harris, Agent M. Delatorre and this Agent were aware of the VARNER cell phone being monitored. Within a very short time, VARNER dropped his cell phone again. This was during the same time when KHAALIS was attempting to anger CNT agents involved with the case by saying the DEA was withholding information from the CNT. KHAALIS was very angry because he was not aware of certain details of the investigation. KHAALIS mentioned the DEA were doing things behind the

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backs of CNT.

SOI 1 said Willet WILLIAMS, James WILLIAMS along with other officers, worked for MCMILLAR. MCMILLAR was able to thrive in the drug industry in Savannah because the police officers were working for him. It makes perfect sense now why no one at CNT had been able to work a case on JONES or MCMILLAR, even though the CNT had received numerous bits of information on them.

SOI 1 had been released from prison and agreed to continue working in reference to this investigation. SOI 1 was kept away from the Savannah area as much as possible. SOI 1 began trying to make contact with ANDERSON's family members in order to keep in touch with him after being released from prison. SOI 1 would eventually meet with ANDERSON's family members on several occasions in order to give them money to be placed on ANDERSON's books.

TFA Broome applied for a consensual Title III intercept, on a cell phone provided to SOI 1. The sole purpose was for SOI 1 to speak with ANDERSON, who had access to a cell phone inside the prison. SOI 1 was finally able to speak with ANDERSON and the two spoke on numerous occasions.

Analysis of call detail records show that Percy June ANDERSON, utilizing cellular telephone number (912) 433-6166, and SOI 1, utilized cellular telephone number (912) 505-???? contacted one another numerous times. During one of these conversations on November 19, 2009 ANDERSON advised SOI 1 the warden had seized and read all of his personal mail to ensure that he was not having any personal dealings with any officers. On November 25, 2009, ANDERSON asked SOI 1 to purchase a Verizon phone card so that ANDERSON could add minutes to his cellular telephone.

On December 01, 2009 SOI 1 asked if "PIMP", referring to James WILLIAMS, was still working the back gate. ANDERSON stated that they moved "PIMP" to the Lawn Mower Crew. ANDERSON also stated that his smuggled cellular telephone cost him \$250.00 and approximately \$2.00 per day. During a telephone conversation on December 02, 2009 SOI 1 gives ANDERSON the pin number for a Verizon phone card so that ANDERSON can add minutes to his cellular telephone. This call was not recorded due to technical difficulties, however, SOI 1 stated that during this same conversation

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ANDERSON stated that he was going to give James WILLIAMS, SOI 1's telephone number so that SOI 1 and James WILLIAMS could coordinate getting telephones into the prison. On the same date another call was placed to ANDERSON at which time SOI 1 left a voice message reminding ANDERSON to give James WILLIAMS SOI 1's telephone number. On December 05, 2009 SOI 1 and ANDERSON discussed the transactions with James WILLIAMS which SOI 1 initially advised agents. During this conversation, ANDERSON stated that at that time he was dealing with James WILLIAMS "heavily in the streets".

On January 12, 2010, this Agent received information from Agent M. Delatorre in reference to KHAALIS. According to Agent M. Delatorre, KHAALIS was showing a special interest in a particular female which had come up in the MURDOCK investigation and was shown to have an association with Agent R. Gerido and has associations with area drug dealers.

KHAALIS began speaking with Agent Wood (Intel Unit) in reference to this female. KHAALIS wanted an intelligence check completed on this female. Agent Wood believed this to be strange since the request did not come from the actual case Agent (M. Delatorre). KHAALIS wanted an intelligence check of this female and wanted to receive any information found on her given to him instead of the case Agent. KHAALIS had already been told by Lt. Smith not to make requests for information on targets of the MURDOCK investigation.

Agent Wood in turn told Agent M. Delatorre about the request. KHAALIS has made similar requests with other suspects involved in the Murdock investigation. KHAALIS has gone to Agents Wood, Kovach and the civilian Nancy Wheelless with intelligence requests. KHAALIS would go to each of them separately in an attempt to obtain more information independently that one or all would/could not provide.

Agent M. Delatorre had secretly been preparing a Title III affidavit for VARNER's cell phone. Few CNT agents were aware of this, KHAALIS did not know until the minimization briefing. The Title III was approved in late January 2010. On January 27, 2010 while at the Minimization briefing at 1230 hours at CNT. TFA Spears stated that KHAALIS had a shocked look on his face when US Attorney Durham mentioned that the new minimization was for VARNER's cell phone. Most CNT

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Agents were unaware VARNER was a primary target until this minimization briefing.

During minimization briefings, the lead Attorney explains all the legal aspects of the case. Rules are discussed and questions are answered. Lt. Smith also goes over rules of his own and one of the main rules is to make sure everyone understands the chain of command for the investigation. The case Agent is the person responsible for making decisions and no one is allowed to conduct any overt acts without the approval of the case Agent. Since KHAALIS has been a part of numerous Title III investigations, he is well aware of this.

After the briefing, KHAALIS was supposed to return to the wire room and remain until the end of his shift. At 1500 hours, this Agent noticed that KHAALIS had left the wire room. KHAALIS left the wire room and returned at approximately 1700 hours, time for him to get off of work. KHAALIS was scheduled to be in the wire room as a monitor that day until 1700 hours, so his leaving and not acting as a monitor in the wire room at all after the minimization as he was scheduled to, became suspicious later in the evening when the VARNER line became active. This was not the only time KHAALIS would leave the wire room for hours at a time. During this investigation KHAALIS would disappear and no one would know his whereabouts. Agents began referring to KHAALIS as “walk about Jones” because it was done so frequently.

On January 27, 2010 at approximately 1700 hours, the same date, VARNER received an incoming telephone call advising him to drop his telephone. VARNER in turn called Murdock and told him to do the same with his telephone. S/A Sarhatt listened to the calls on the dropped VARNER line and stated that at approximately 1700 hours, VARNER received an incoming call telling him to drop the phone. This call was only half intercepted (VARNER’s voice only). VARNER makes a comment to the effect “I’m not talking on my flip”. No data about the incoming caller was received.

TFO Broome later reviewed the Pen information on KHAALIS’ telephone and observed that it was very active in the hours following the minimization, during the same hours that KHAALIS was away from the CNT office. TFO Broome discovered that KHAALIS had contact with Kenneth GIBBONS (the same individual who contacted KHAALIS re: MCMILLAR), during the minimization hearing. Due to the number of calls, TFO Broome could not request tolls on all of the numbers to find a link

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back to the source who notified VARNER to drop his phone. Agents only know that the incident happened and that it was very suspicious; KHAALIS left the wire room and upon his return, VARNER receives a call informing him to drop his cell phone.

S/A Sarhatt asked for all the names of Agents who knew about the VARNER line going up. From this point on KHAALIS was frequently stirring up other CNT Agents in reference to the DEA withholding information from CNT because they did not trust agents. KHAALIS would always get upset and cause others to do the same. This went on multiple more than once and at different times during the almost 6 month Title III investigation. This reoccurrence was another “red flag” that agents observed from KHAALIS. KHAALIS was well aware the DEA was withholding information and attempted more than once to upset other CNT agents working on the case.

During the time of late January to early February 2010, Agent Desautels was conducting research on You-Tube. This was in reference to the MURDOCK investigation, trying to identify different rappers associated with MURDOCK. Agent Desautels located a rap video with Officer SAWYER of the SCMPD was a part of the video in uniform. Since SOI 1 had previously picked out SAWYER as a participant during a second drug purchase with ANDERSON, it was believed that KHAALIS would possibly try and warn SAWYER of the video.

This Agent was directed to locate and begin discussing the video when KHAALIS was present in order to find out if he would in fact warn SAWYER. When this happened, Lt. Smith was also in the room and since he had no idea about the plan he made a big deal about it and went to speak with Captain McBurney in reference to the video. Lt. Smith returned a short time later and wanted additional information in order to inform Internal Affairs. This ruined the plan at that time.

On February 13, 2010 KHAALIS was scheduled to work with Agents Harris and Guyer in the wire room as monitors. Meaning they were to remain inside the wire room from 1700-0200 hours monitoring phone calls. Around 2230 hours, a call was intercepted between MURDOCK and a female who had already been identified by the case Agent. The two had planned to meet each within the hour. KHAALIS told Agents Harris and Guyer he was going to get something to eat and left the wire room.

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A short time later they over heard KHAALIS requesting a marked police vehicle perform a traffic stop. Agent Guyer contacted KHAALIS and inquired whether or not KHAALIS had spoken with the case Agent. KHAALIS responded by saying “yes and no” and that he “somewhat” discussed making a traffic stop with the case Agent. Lt. Smith received a call from Sgt. Kennedy inquiring as to the probable cause for the traffic stop. It was only after Sgt. Kennedy contacted Lt. Smith did KHAALIS inform him about the stop. According to Lt. Smith, KHAALIS said he had spoken with the case Agent about conducting the stop.

Case Agent M. Delatorre was later asked by Lt. Smith if KHAALIS had spoken with him in reference to conducting this traffic stop and he said KHAALIS did not speak with him on the matter. KHAALIS has served as not only a monitor but also on surveillance during a Title III investigation and is well aware, no overt actions are taken without the permission of the case Agent. KHAALIS had already lied to Agent Guyer and Lt. Smith thus far.

On February 13, 2010, Lt. Smith spoke with KHAALIS in reference to the traffic stop. KHAALIS admitted that he had not spoken with anyone in reference to the traffic stop and that he was just being proactive. Lt. Smith asked KHAALIS why he lied to him on the phone as well as Agent Guyer. KHAALIS could not explain why he lied. When questioned further, KHAALIS still could not explain his actions. Lt. Smith began to insist KHAALIS be transferred from the unit after he admitted he lied. It was at this time Lt. Smith was informed by Director Harris of the investigation involving KHAALIS. This was done in order to keep KHAALIS at CNT in order to keep track of his actions.

In March of 2010, the FBI received authorization to install a tracking device on the CNT vehicle of KHAALIS. KHAALIS was away for military training at the time. This Agent along with TFO Broome picked up KHAALIS vehicle from the county garage at which time a tracker was placed on the vehicle. The tracker was placed on the vehicle by the FBI. TFO Broome then dropped KHAALIS CNT vehicle off at the CNT office. Even though KHAALIS left his vehicle at the county garage for maintenance, it is not uncommon for another agent to drive another vehicle from the garage back to the CNT office.

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While KHAALIS was away on military leave, he contacted different CNT agents wanting any updates on the case. This was done on an almost daily basis according to Agent Desautels. Once KHAALIS returned from training, he began to inquire how his vehicle arrived at CNT. KHAALIS had left the vehicle at the county garage. KHAALIS became loud and boisterous demanding to know who picked up his vehicle from the garage and why it had been moved. KHAALIS then began to give the vehicle a thorough inspection just outside of the wire room. This Agent was present and noticed how nervous KHAALIS was on this day. This Agent observed KHAALIS search the entire vehicle as if he were searching for something.

For some reason the passengers window would not work momentarily. KHAALIS was told that CNT Agent Gonzalez had picked up the vehicle from the garage as he often does. From this point on, KHAALIS very rarely drove this vehicle, but instead borrowed and drove a spare CNT truck. His behavior and actions again made agents suspicious. Only an individual with something to hide would act in this manner. KHAALIS continued using other CNT vehicles even after being told to discontinue using other CNT vehicles besides his own.

During this investigation, numerous techniques were used in order to move the case along. On March 23, 2010 Agents of the Drug Enforcement Administration and the Federal Bureau of Investigation planned to have an informant place an anonymous blocked call number into the main line at the CNT building by calling 912-652-3900. With the assistance of CNT Director Roy Harris, CNT Major Case Lt. Rusty Smith, and this Agent, KHAALIS would be the only agents in the building capable of accepting the anonymous call. The plan was to have the anonymous caller and hereafter referred to as (CI) request to speak with an agent and have it announced over the intercom. The CI will not ask for identification from KHAALIS, but will only inform him of the following:

The CI lives in Atlanta and her boyfriend (if name given only give approx age) is a “runner” for an unknown individual. She will continue to state that she has been on a couple (two) runs with her boyfriend in which they would drive a rental vehicle (which was provided for them/ which her boyfriend rented) to a predetermined/directed hotel in Savannah and park the car in the hotel parking lot, leaving the car unlocked. The CI will state that they would then rent a room and they would mostly remain inside of the room. After a period of time, her boyfriend would receive a call telling

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him they could leave. They were always directed to leave early the following morning so that they could drive in rush hour traffic. The CI will state that she and her boyfriend then drove back to her apartment in Atlanta, taking the bag inside. Her boyfriend would then receive a telephone call at which time he would leave alone. The CI will state that on the second occasion at her apartment her boyfriend stepped out of the room and she looked into the bag and observed a large quantity of cash (if asked it looked to be approximately \$30,000 or \$40,000). The CI has never witnessed any drugs but she is confident that it is drug proceeds through various statements that her boyfriend has made. The CI will advise KHAALIS that she is coming forth with this information because she recently discovered that her boyfriend has been cheating on her. The CI will also advise KHAALIS that the next time that her boyfriend makes a run to Savannah she can call him to give him the vehicle description, time, and location if she has that information. She will then ask KHAALIS for his telephone number but advise him that she does not want to know anything more about him or her. If asked any questions by KHAALIS the CI will advise that she does not know the answer because her boyfriend always handled the details, she will attempt to find out those answers, and that she will call the next time she is aware of an upcoming trip.

When the call was announced, it was answered by KHAALIS. This Agent could hear him speaking with someone on the phone. S/A Hayes and TFO Broome were with the informant at the time the call was made and we were certain KHAALIS was speaking with the informant. The informant did not provide the information to KHAALIS in the correct manner. The informant was to provide only enough information for KHAALIS to begin. Instead the informant provided too much information and it was believed that KHAALIS became suspicious of the informant's information. KHAALIS later informed Lt. Smith of the information he had received. The purpose of this operation was to find out whether KHAALIS would report the information to a supervisor or not.

On April 2, 2010 Agents of the Drug Enforcement Administration and the Federal Bureau of Investigation will have a Confidential Source place a second telephone call to KHAALIS via CNT cellular telephone number (912) 547-1232. The informant will block her telephone number. At this time the CI will advise KHAALIS of the following:

I really shouldn't be telling you all of this. Are you sure this will not come back on me? You're not

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going to tell him that I said anything are you? I want him to suffer but I don't want him to go to jail either. I just thought that if ya'll scared him or seized his money then maybe he would learn a lesson.

Well, last night (Thursday night, April 01, 2010) my boyfriend told me that he was making another trip to Savannah (today/Friday) and asked me if I wanted to go. I've been thinking since the last time that we talked and I don't want to be there if ya'll pull him over or something, especially if there's drugs in the car. I'm not going to jail for his ass. I told him that I didn't really want to go since I didn't know what was in the bags, in case we get pulled over or something. I got kids. He said that the only thing in the bags was money and it is not against the law to drive with money in the car. He said that the worst that the folks could do was take it. He said that he is only moving money now. (He said that he is just exchanging money?) I don't know if I believe him or not, but I do know that that one time that I saw it was money in that bag, like I said...about \$20,000 in bundles. I told him I couldn't go this time anyway because I had the kids.

Anyway, he left this morning and he is supposed to be spending the night tonight. I don't know if he's gonna have his tramp with him or not. I don't know what he will be driving either because as of last night he hadn't rented a car yet. I do know that he will be staying in the same area by the airport because they say that it is safer there. I can call you if I hear anything.

Car – Don't know.
 Exact Hotel – will tell you if he tells me.
 Time – left this morning. If he calls me when he gets there I will let you know.

Next time we can say that he went but he did not bring anything back because it was not ready yet. So the next time we can say that he is coming to Savannah only to pick something up and take it to Atlanta.

The CI again did not provide the correct information to KHAALIS but he did not inform Lt. Smith of the information he received during this second call. Both of the calls were recorded and have been kept by the DEA/FBI.

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On the few occasions when KHAALIS did drive his assigned CNT vehicle, the tracking device revealed KHAALIS did check the locations mentioned by the CS. This was done on days when KHAALIS was working in the wire room as a monitor. KHAALIS would often inform Lt. Smith he was going home to eat lunch but the tracking device showed him at other locations.

On May 11, 2010 the MURDOCK case was shut down. Agents executed multiple search warrants throughout Chatham County, Effingham, Atlanta and California. CNT agents were sent to various locations. KHAALIS was sent to the main location in order for him to be near Lt. Smith. Agent Wood was also sent to this location, since the main suspects were expected to be present. Agent Wood was to download information from each of the suspect's cell phones. Agent Wood frequently does this and other agents are not to access the phones until he is finished.

According to Agent Wood, KHAALIS began grabbing cell phones and was searching the phones information. Agent Wood told KHAALIS more than once to "stop" touching the cell phones until he was finished but KHAALIS did not listen. Agent Wood reported this to Agent M. Delatorre.

After the MURDOCK case was shut down it was decided that the investigation involving KHAALIS should be shut down as well. We believed the case had been taken as far as it could go and KHAALIS and others were still insulating themselves.

On June 3, 2010, DEA Agents executed a search warrant at 1463 East 40th Street. The day began at the FBI office, where members of the Savannah Metro Internal Affairs unit led by Captain Fagerstrom were briefed on the case. The plan was for Commander Harris to isolate KHAALIS and Agent Gerido in order for them to be questioned by S/A Hayes. This Agent was not involved with the interviews but discovered later that Agent Gerido was able to explain his involvement with the surveillance operation on April 16, 2009. S/A Hayes accepted the explanation provided by Agent Gerido and he was no longer believed to be a suspect.

According to Lt. Smith, KHAALIS agreed to speak with S/A Hayes but was unable to explain his actions on April 16, 2009. KHAALIS was unable to explain many other details as well. Again, this Agent was not present during the interview and was not provided with much information. KHAALIS

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did agree to take a polygraph test with the FBI.

Based on the interview and other details, Commander Harris informed KHAALIS he would no longer be a member of the CNT. KHAALIS was ordered to turn in his CNT equipment and was transported to his residence by Sgt. Schaff and Agent Gonzalez. KHAALIS had also been placed on administrative leave with pay.

The polygraph was given to KHAALIS days later and again this Agent was not present. It was discovered that KHAALIS failed the polygraph on two main questions. The first question was whether KHAALIS provided information to WILLET during the April 16, 2009 surveillance operation and the second was whether KHAALIS felt he violated his oath of office.

Agent M. Delatorre and other DEA Agents executed the search warrant at James WILLIAMS' residence in the early morning hours before KHAALIS and Agent Gerido were questioned. Agents located less than an ounce of marijuana from the residence. James WILLIAMS was at work at the time. Smoked marijuana cigarettes were found throughout the residence. Cocaine and marijuana test kits were also found inside the residence. No one was inside the residence. The residence was secured.

Around the same time TFA Broome along with this Agent met with Warden Koon at Coastal State Prison. Warden Koon had replaced Warden Ammons, who had retired months earlier. The warden had been aware an investigation had been ongoing. James WILLIAMS was requested to the warden's office and he agreed to speak with us.

James WILLIAMS was calm until he was informed of the drug investigation involving him. James WILLIAMS smirked and denied he was involved in illegal activities. This went on until ANDERSON's name was mentioned. James WILLIAMS sank into his chair and placed his head down. James WILLIAMS soon began to be more honest. James WILLIAMS admitted knowing ANDERSON but only after being asked more than once. James WILLIAMS provided the same information SOI 1 had provided on how they met.

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James WILLIAMS admitted that he smoked marijuana at home and ANDERSON would sometimes be present. James WILLIAMS denied that ANDERSON ever sold him any drugs or even brought any drugs into his residence. James WILLIAMS admitted he had known Thomas LAWTON; a well known drug dealer. James WILLIAMS said he purchased most of his drugs from John JONES and provided Agents with his cell phone number. James WILLIAMS down played his illegal activities and did not admit to dealing drugs or working with his brother Willet WILLIAMS.

Around this time, TFO Broome along with this Agent met with Capt. Wiley, Lt. Oliver and Sgt. Thompson of the Internal Affairs unit. Hours were spent going over the large amounts of circumstantial evidence. This Agent tried to explain to everyone, KHAALIS had been able to avoid detection until the day of the surveillance operation. KHAALIS had known most of the details provided by SOI 1 and he had plenty of time to warn those involved. Internal Affairs had been told of the many different oddities in KHAALIS' behavior as well as the different lies he told. Specifically, when he lied to Lt. Smith in reference to the traffic stop he conducted on February, 2010. They were also shown and given a copy of the toll information in reference to the April 16, 2009 surveillance operation.

On June 14, 2010 at approximately 1315 hours Lt. Smith along with this Agent met with Percy June ANDERSON at Rogers State Prison. This was in reference to a criminal investigation in which ANDERSON was involved. ANDERSON was familiar with this Agent already from a previous interview almost two years earlier. At first, ANDERSON was unsure he wanted to meet with Agents. This Agent told ANDERSON to sit and listen to what was said and afterwards he could make his decision. ANDERSON decided to sit down and listen.

ANDERSON was very cocky and angry at first and seemed very disinterested in meeting with us. This Agent began explaining that ANDERSON was a major part of a joint investigation involving the CNT and the DEA. This Agent went on to tell ANDERSON that the investigation had been going on for well over two years. ANDERSON was given different situations such as his arrest on August 6, 2008 for drug offenses and the fact that he was transferred away from and returned to Coastal State Prison. This Agent informed ANDERSON that things happened with this Agent's knowledge and say so. ANDERSON was now becoming interested and began to look at this Agent now.

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This Agent then provided ANDERSON with two phone numbers (912-433-6166 and 912-531-6848). Both were phone numbers ANDERSON had used to make phone calls since he has been incarcerated in the state prison system. ANDERSON now appeared very frightened. ANDERSON slumped in his chair and his eyes had a look of amazement. ANDERSON then looked away and put his head down. ANDERSON was now very interested in what was being said and was paying close attention. It was very obvious ANDERSON realized he was part of a criminal investigation by his reaction.

This Agent informed ANDERSON that his phone calls had been recorded for a long time. This Agent asked ANDERSON if he now understood the situation a little more and he agreed. This Agent went on to tell ANDERSON that although he was a main part of the investigation he was not the person we were after. ANDERSON was told that if he decided to provide information against his associates, things “could” possibly go easier on him. This Agent informed ANDERSON to provide information on people who working for law enforcement and involved in illegal activities.

ANDERSON at first denied having any knowledge of anything. ANDERSON continuously said he had no idea who we were referring to. This Agent said the name “PIMP” and ANDERSON looked stunned and totally changed his body posture. ANDERSON crossed his arms and bent over in his chair. It was obvious ANDERSON was caught by surprise when the name “Pimp” was mentioned. ANDERSON asked we were referring to the corrections officer and we agreed. The name “Pimp” was a nickname for James Edward WILLIAMS. James WILLIAMS was working as a corrections officer at Coastal State Prison and had prior dealings with ANDERSON.

ANDERSON agreed that he knew of James WILLIAMS from being an inmate at the prison but said they were not associates. Lt. Smith asked ANDERSON if he and James WILLIAMS ever hung out together and ANDERSON denied it. Lt. Smith asked ANDERSON for a second time and this time ANDERSON admitted that he and James WILLIAMS had hung out on one occasion years ago. ANDERSON was referring to the traffic stop which occurred in the year 2005. During this traffic stop, ANDERSON was an occupant in the vehicle James WILLIAMS was driving. ANDERSON was found to be in possession cocaine and marijuana and was arrested.

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The fact that ANDERSON at first tried to cover this up shows how ANDERSON was trying to conceal any involvement with James WILLIAMS outside the prison system. This Agent told ANDERSON that James WILLIAMS had already been interviewed and he had given a far different story. This Agent told ANDERSON, James WILLIAMS had admitted ANDERSON had brought numerous amounts of illegal drugs to include marijuana and cocaine to James WILLIAMS' residence in the past.

ANDERSON became upset and denied this took place. This Agent told ANDERSON those statements and others had come from his mouth during phone conversations ANDERSON had with other people. ANDERSON changed his story and now admitted that he and James WILLIAMS had hung out a few times and would drink alcohol. Agents continued to push ANDERSON for more truthful information and he changed his story again by admitting that he and James WILLIAMS not only drank alcohol together but they also smoked marijuana together. ANDERSON would not provide any further details on James WILLIAMS.

Agents continued to push ANDERSON to give up additional information and at some point this Agent mentioned the name "SARGE" aka Willet WILLIAMS. ANDERSON looked amazed again and reacted the same way as he did when the name "PIMP" was mentioned. ANDERSON said he knew many different people named "SARGE" but went no further. Again this Agent informed ANDERSON he had mentioned the name "SARGE" during phone calls he had made. ANDERSON still denied having any information.

As the interview went on, ANDERSON showed signs of his possible willingness to cooperate with law enforcement. ANDERSON seemed fearful and felt that the police could not be trusted. ANDERSON made comments to the effect of "I'm dead either way" and "I have to return to Savannah when I get out". ANDERSON also mentioned his four children and their well being if he agreed to cooperate. This Agent told ANDERSON he was on the brink of fully cooperating and would have to trust us. ANDERSON agreed with the comment but was unwilling to change his mind.

This Agent believes ANDERSON was trying to conceal or minimize his involvement in criminal activities with James WILLIAMS and Willet WILLIAMS. If ANDERSON had nothing to hide why

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did he attempt to conceal the fact he knew James WILLIAMS in particular; even though he was aware of a paper trail proving they knew each other. The facial expressions and body posture ANDERSON showed when the James and Willet WILLIAMS were made was also suspicious. ANDERSON looked scared and surprised.

On June 25, 2010 at approximately 0930 hours S/A J. Hayes along with this Agent met with Percy June ANDERSON at Rogers State Prison. This contact was made in reference to an on-going criminal investigation. This was the second meeting with ANDERSON in as many weeks.

At first ANDERSON was not certain if he wanted to speak with us. ANDERSON informed Agents, his attorney did not want him speaking with law enforcement any further. Agent Hayes informed ANDERSON that it was his decision not his attorney's if he wanted to speak. ANDERSON agreed to speak with Agents without his attorney present.

Agent Hayes outlined the criminal investigation being conducted. Agent Hayes informed ANDERSON that he was a key person in this investigation but that he was being questioned in order to offer him the opportunity to assist law enforcement. At first ANDERSON acted as if he did not know anything.

Agent Hayes told ANDERSON the investigation was focused on corrupt police officers who were involved in illegal activities. ANDERSON tried to minimize his involvement in illegal activities by saying he did not have any information to provide. ANDERSON soon began providing bits of information.

Agent Hayes asked ANDERSON for information on his dealings with James Edward WILLIAMS. ANDERSON admitted as in the previous interview he knew James WILLIAMS and even hung out at his residence upon being released from Coastal State Prison. ANDERSON explained the two would often hang out at James WILLIAMS' residence to drink and smoke marijuana together. ANDERSON said he had met numerous other corrections officers from Coastal State Prison at the James WILLIAMS residence. ANDERSON added these corrections officers would not smoke marijuana while he was around.

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VICTIM: CNT		ADDRESS: 71 ROSS ROAD

ANDERSON was asked if he had ever met other people at the James WILLIAMS residence. ANDERSON at first denied ever meeting any other people at the residence. ANDERSON was asked the same question at least two or three other times and he finally admitted that he had met a friend of his at the James WILLIAMS residence on one occasion. ANDERSON refused to name this person but said it was a friend of his from Florida known only as "SMILEY" and they had met at the halfway house after being released from prison. Much of the information provided by ANDERSON matched the information provided by the informant who was working with us.

ANDERSON was asked if he ever met any of James WILLIAMS' relatives and again he denied this at first. After asking this question a few more times ANDERSON said he met a brother. The brother was described as being a police officer who worked for Savannah Metro and admitted to meeting him on more than a few occasions. The first time ANDERSON said he met the brother was on a traffic stop in the year 2005. During this traffic stop ANDERSON was arrested for possession of controlled substances with intent to distribute. ANDERSON said the brother arrived at the location after he had been placed under arrest. ANDERSON and James WILLIAMS had been together during this traffic stop.

Agent Hayes asked ANDERSON if he knew anyone known as "SARGE" and at first ANDERSON denied knowing anyone by that name. After being asked a few more times, ANDERSON admitted knowing someone by that name and said he knew James WILLIAMS' brother as "SARGE". This again proves information previously provided by the informant. According to ANDERSON, he met the brother at James WILLIAMS' residence more than once. Sometimes the brother would drive a marked police vehicle and be in a police uniform and sometimes he would arrive driving a white colored vehicle.

This Agent was familiar with a white colored vehicle because on April 16, 2009, a surveillance operation was conducted at James WILLIAMS' residence and observed a white colored SUV park into the garage. This Agent is aware that Willet WILLIAMS, the Savannah Metro officer possibly drives a white colored SUV. Agent Hayes asked ANDERSON if he felt that James WILLIAMS' brother, the police officer, was protecting him from being arrested at any time. ANDERSON replied

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something to the effect of, "he could've been".

ANDERSON was careful not to say he observed the Savannah Metro officer (Willet WILLIAMS) was directly involved in any illegal activities. ANDERSON tried to word every piece of information he provided carefully. ANDERSON provided additional important information on James and Willet WILLIAMS.

In short, CNT Intel Agent Wood, Agent P. Delatorre, Agent M. Delatorre, CNT Lt. Smith, DEA S/A Sarhatt, DEA TFO Broome, and two additional CNT agents whose names will not be disclosed but responded to the FBI office and who all have worked closely beside KHAALIS, have at some point independently have stepped forward and approached supervisors of their suspicions of KHAALIS based on his behavior and actions. This investigation was compromised from the start, since KHAALIS was well aware from the beginning. KHAALIS had plenty of time to not only insulate himself but others involved in the conspiracy. KHAALIS first heard of this information in June of 2008 and we did not discover his involvement until May of 2009.

US Attorney Jim Durham along with the FBI has since discussed this case with Chief Lovett and explained to him the US government will not prosecute any case which names KHAALIS as a witness due to GIGLIO issues. The Chatham County District Attorney has also been told the same information. As of August 2010, KHAALIS has been returned to full duty. While on suspension, KHAALIS was able to take the Sergeant's test and he is currently in the running for promotion to the rank of sergeant. Agents have no idea how many CNT investigations if any were compromised during the time KHAALIS was assigned to the unit.

On August 25, 2010, this Agent was speaking with Agent L. Lang in reference to KHAALIS' new wife Nicole. Nicole's maiden name is LOVETT. Agent Lang stated he was one of Nicole's field training officers (FTO) and one day Agent Lang asked Nicole if she related to then Major Lovett. According to Agent Lang, Nicole said Major Lovett was her uncle but she did not like to let people know. Nicole did not want people to think she would receive special treatment from Major Lovett. This information was given to S/A Hayes of the FBI, since KHAALIS had previously told S/A Hayes, Nicole was not related to then Major Lovett.

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During the week of August 22, 2010, this Agent was approached by Agent Metz. Agent Metz wanted to discuss a conversation she had with KHAALIS on the previous evening. According to Agent Metz, Agent Harley called her via a CNT cell phone and informed her KHAALIS wanted her to call him. Agent Harley provided Agent Metz with a phone number for KHAALIS. Agent Metz called KHAALIS on her personal cell phone. Agent Metz said KHAALIS told her not to believe the things people were saying about him. KHAALIS went on to say the allegations were now “being investigated” and he would be proven innocent.

On August 31, 2010, Lt. Smith informed this Agent, KHAALIS was believed to communicating with other CNT Agents as he was trying to obtain information provided in this report. According to Lt. Smith, KHAALIS contacted Agent Lang on August 30, 2010 and wanted to know the type of items listed in this report. Agent Lang told KHAALIS he did not have any information on the contents of the report.

On September 1, 2010 this Agent spoke with ex- Savannah Metro Detective Darryl Fullmer via cell phone. Fullmer told this Agent he had spoken with Lt. Phillips of Savannah Metro on the previous day. According to Fullmer, Lt. Phillips wanted to know why “your boys were trying to accuse KHAALIS of things”. Lt. Phillips went on to say rumors were going around the police department that Agent M. Delatorre along with this Agent were trying to work a case and “messed up the investigation and were trying to blame KHAALIS for the case failure”.

On September 2, 2010, Commander Harris spoke with the Major Case Unit and then the remainder of CNT personnel at a different time. This Agent was not present at the meeting but was later informed by Lt. Smith of the topic of the meeting. According to Lt. Smith, Commander Harris informed Agents, the investigation into KHAALIS was still on-going. Commander Harris informed Agents he did not want Agents to have contact with KHAALIS while on-duty. Commander Harris also recommended Agents not speak with KHAALIS off-duty as well.

Within an hour of this meeting KHAALIS contacted Agent Epley via cell phone. KHAALIS asked Epley if it was true that Agents were told not to have any contact with him. Agent Epley quickly

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informed Lt. Smith of this contact.

Around the first week of October, 2010, Commander Harris met with the Chatham County Attorney in reference to this investigation. For two weeks leading up to this meeting, Commander Harris had me create a shortened version of this report. A three page report was created and given to the commander for this meeting. This Agent had discovered that Savannah Metro. Police Chief Lovett had not disciplined KHAALIS due to lack of evidence and Commander Harris wanted a meeting with the County Attorney to address the issue.

On October 4, 2010 at around 1400 hours, this Agent received information from another CNT agent transfer from CNT to patrol had been issued. This Agent discovered the first 3 to leave CNT would be Agent Harris, Broome and this Agent beginning on November 1, 2010. Based on the information this Agent received from other sources Chief Lovett had discovered Commander Harris was still trying to conduct an investigation into the KHAALIS case and called for a meeting with him. Commander Harris had long informed this Agent that Chief Lovett had been requesting Agent M. Delatorre along with this Agent specifically since early spring of 2010. This was towards the end of the MURDOCK Title III (wire) investigation and just before the end of the KHAALIS investigation. This Agent was told; Chief Lovett specifically said he wanted Agents Broome, M. Delatorre along with this Agent on November 1, 2010. Commander Harris had to request permission for additional time for Agent M. Delatorre due to a round-up for approximately 40 suspects in reference to the MURDOCK investigation.

The end result was, Agent M. Delatorre was due back on patrol December 1, 2010 and was replaced on the list by Agent Harris. On December 1, 2010 Agents Gerido, Lt. Mitchell and M. Delatorre report to patrol. Agents were told the transfers were taking place because Chief Lovett wanted his officers to gain experience in different areas within the police department. Chief Lovett was also ordering transfer for all other officers assigned to other federal agencies who have been gone for 5 years. Officers Darryl McCormick (ATF), Roger Mydell (US Marshal's) and Jerry Spears (DEA) have also been slated to return to metro. Agent Harris will hit the 5 year mark on October 17, 2010. In addition, other CNT agents have been assigned to CNT longer than Agent Harris but he is scheduled to transfer before them.

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Detectives in other units such as homicide, burglary, robbery and financial crimes apparently do not have to abide by the same time constraints as CNT. This Agent believes the transfers are taking place in order to prevent or stop any further investigations into KHAALIS and/or Willet WILLIAMS. This belief is based on the facts of the investigation and the timing of these transfers. Commander Harris has been pushing for KHAALIS to be disciplined and nothing has been done. In fact KHAALIS has recently passed the sergeants assessment and is awaiting a promotion.

Agent Broome has been a task force agent with the DEA since 2006 and he was significantly involved with the KHAALIS investigation. Agent Harris was named in the report as a witness to the unapproved surveillance conducted by KHAALIS on February 13, 2010. Agents Broome, M. Delatorre, Harris and this Agent were the most heavily involved in this investigation and are being transferred back to patrol duties. It remains to be seen if officers Mydell, McCormick and Spears will also be returned to patrol or reassigned to a detective's position within the police department.

EXHIBIT E

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'A sad day for law enforcement'

Five more officers' bonds set Friday in Savannah drug case

By Ben Schmitt / Savannah Morning News

A week before he was arrested, Savannah police Sgt. Billy Medlock took an eight-day leave from work that led him to Jacksonville, Fla., Macon, Tifton and Hinesville.

Medlock said he needed a break from the police force and Savannah. He went to visit old friends, popping in on them unexpectedly and staying at \$30-a-night hotels.

But federal prosecutors said they believe Medlock knew he was going to be arrested Wednesday on charges involving cocaine distribution - along with 10 other current and former police officers - and was pondering whether he would face the charges or flee.

U.S. Magistrate G.R. Smith set a \$150,000 bond Friday for Medlock, saying he felt Medlock posed the likeliest threat of all those charged to run before going to trial.

"I think the idea of fleeing was in the back of your mind," Smith said. "Just because you turned yourself in doesn't mean that idea won't crop back up."

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During detention hearings Friday for five of the accused, Smith said his task was to set bonds for the officers based on their chances of fleeing and their risk to the community. The weight of the evidence against them was not a major consideration.

However, plenty of evidence was presented Friday, including videotapes showing then Savannah police officer Thomas K. Bryant Jr. supposedly selling cocaine to an FBI informant. Another officer at the time, William H. Banks, can be seen apparently selling a gun to the informant.

"The evidence is disturbing," Smith said. "It's a sad day for law enforcement and those who were sworn to uphold the law, and that's a sobering thought to the community."

Bryant and Banks' bonds were set at \$100,000 each. Two other accused officers, Damion K. Welcome and Keith J. Coleman, had bonds set at \$50,000 each.

Five other officers — Anthony K. Bryant, Keith London, Christopher H. Alexander, Frederick Gorham and Eugene M. Johnson — had bonds set Wednesday ranging from \$35,000-\$50,000. Detective Ralph E. Riley waived his right to a detention hearing and remains in jail.

Smith set out several guidelines for any of the suspects who post bond. They must stay on house arrest, submit to drug tests and wear an electronic monitoring device.

Other evidence presented included FBI Special Agent Steven Crum testifying about how the investigation began leading to the officers' arrest.

Crum said the FBI started receiving reports in early 1994 about corruption in Savannah's law enforcement community. In 1995, a convicted drug dealer came to the FBI and offered to assist breaking up the police ring, Crum said.

Soon after, the informant and other undercover agents began setting up sting operations. In the stings, the police officers are accused of escorting the people they thought to be drug dealers into and out of town during staged drug deals.

The Bryant brothers, Banks and Alexander are accused of providing security for the fake drug traffickers from December 1995 to January 1997.

Coleman and Welcome are accused along with Gorham and Johnson of conducting similar protection activities from November 1996 to March 1997. The FBI stopped activities with them after becoming concerned about the safety of their informant, Crum testified.

Medlock and Riley face similar accusations from March to August 1997.

Packages of FBI-seized cocaine weighing 4.7 kilograms were used in the various deals, agents testified.

Some of the officers also are accused of selling stolen guns to the undercover agents.

In an FBI videotape of Thomas Bryant selling a gun to the informant, Bryant says, "I hope the mother f— got sense to ditch a gun if he shoots someone with it."

On another occasion, Thomas Bryant goes to the informant's apartment and can be seen on videotape selling him what appears to be 8 grams of cocaine for \$400. Bryant, dressed in his police uniform, explains to the informant on video that he got the drugs from a dealer during a raid. The two sample the cocaine's authenticity by placing a tiny bit on their tongues.

After the various pieces of evidence were presented, some family members spoke to the judge on behalf of their loved-ones. Most tried to convince Smith the accused officers weren't flight risks.

Gloria Coleman, Banks' girlfriend, said he is a "devoted father to his children and a very good person."

More than 20 friends and family members stood up in court on Thomas Bryant's behalf.

"All of them would testify that he has no reputation for violence and has strong family ties," said his attorney, Sage Brown.

Attorney Diane Morrell said she was working with family members to post Coleman's \$50,000 bond.

"We're very happy that he has an opportunity to post it," she said.

Medlock — the only officer to testify Friday — broke down in tears when he took the witness stand and was asked to point out his family members in the courtroom.

Afterward, Medlock's attorney said he planned to meet with family members to see if they can post some property to meet his client's bond.

"We're going to give it our best shot," Allen said.

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Officer fired for appearing in rap video

Posted: Jul 01, 2011 10:12 AM EDT
Updated: Jul 11, 2011 7:51 AM EDT

SAVANNAH, GA (WTOC) - According to former Savannah-Chatham Metro Police Dept. Officer Floyd Sawyer's personnel record, he was fired from the department for appearing in a rap video with his squad car and uniform and then lying to his superiors about it.

The rap video was for artist Killer Mike and Sawyer is seen in a ski mask with his squad car in the background with the lights on.

In the personnel file, Sawyer admits to being in the video.

Sawyer's participation in the video was not authorized by the department documents say.

He is seen frisking a man and taking money from him and handing it to another officer.

Chief Willie Lovett decided to fire Sawyer for his appearance in the video. Records show Sawyer lied when asked about it by his superiors and changed his story.

Sawyer appealed to then acting city manager Rochelle Small-Toney, but she upheld the department's decision and Sawyer was terminated.

WTOC obtained Sawyer's 311 page personnel file that contained other issues.

In 2008, Officer Sawyer was suspended without pay for showing up to Federal Court in uniform and testifying for his friend.

According to the records, he wasn't subpoenaed and documents say he had no business testifying in uniform for a defendant.

Before Sawyer became a police officer, his background check shows he was arrested for having a concealed weapon, contempt of court, and deposit account fraud.

The charges were later dropped.

Sawyer faces federal charges after authorities say he took drugs from dealers then sold the drugs himself. None of those issues were in the personnel file.

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EXHIBIT G

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SAVANNAH DIVISION

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UNITED STATES OF AMERICA

v.

FLOYD B. SAWYER, JR.
Defendant.

INDICTMENT NO. **CR-411 207**

VIO: 18 U.S.C. § 1951
Extortion

21 U.S.C. § 846
Conspiracy to PWID

18 U.S.C. § 924(c)
Possession of Firearm in
Furtherance

18 U.S.C. § 1001
False Statements

THE GRAND JURY CHARGES:

Introduction

At all times material to this Indictment:

1. Defendant **Floyd B. Sawyer, Jr.** was a Savannah-Chatham Metropolitan (SCMPD) Police Officer.
2. SCMPD Officers who held off-duty security jobs were required to wear their SCMPD uniforms and carry their SCMPD-issued firearms.
3. Defendant **Floyd B. Sawyer, Jr.** worked off-duty providing security for a Savannah area night club.
4. As an SCMPD Officer providing off-duty security to a Savannah area night club,

Defendant **Floyd B. Sawyer, Jr.** extorted things of value, including illegal drugs, from patrons of the night club.

COUNT ONE
Extortion
18 U.S.C. § 1951

5. Paragraphs 1 through 4 of the Introduction are incorporated by reference as if fully set forth herein.

6. On or about May 22, 2010, in Chatham County, within the Southern District of Georgia, the Defendant, **Floyd B. Sawyer, Jr.** aided and abetted by others both known and unknown to the Grand Jury, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Sawyer, in his capacity as an SCMPD Officer, obtained and attempted to obtain purported Oxycontin pills and a cell phone from an individual with that individual's consent, which was induced by the wrongful use of threatened force, violence, fear, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT TWO
Possession of a Firearm in Furtherance of a Crime of Violence
18 U.S.C. § 924(c)

7. Paragraphs 1 through 6 of the Indictment are incorporated by reference as if fully set forth herein.

8. On or about May 22, 2010, in Chatham County within the Southern District of Georgia, and elsewhere, **Floyd B. Sawyer, Jr.** did knowingly and intentionally possess a firearm in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, the extortion as alleged in Count One of this Indictment.

All done in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE
Conspiracy to Possess with the Intent to Distribute
21 U.S.C. § 846

9. Paragraphs 1 through 8 of the Indictment are incorporated by reference as if fully set forth herein.

10. On or about May 22, 2010, and prior thereto, in Chatham County, within the Southern District of Georgia, and elsewhere, **Floyd B. Sawyer, Jr.** did knowingly and intentionally combine, conspire, confederate and agree with others both known and unknown to the Grand Jury, to possess with intent to distribute Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All done in violation of Title 21, United States Code, Section 846.

COUNT FOUR
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

11. Paragraphs 1 through 10 of the Indictment are incorporated by reference as if fully set forth herein.

12. On or about May 22, 2010, in Chatham County within the Southern District of Georgia, and elsewhere, **Floyd B. Sawyer, Jr.** did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the conspiracy to possess with an intent to distribute controlled substances as alleged in Count Three of this Indictment.

All done in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE
False Statement to Federal Agents
18 U.S.C. § 1001


13. Paragraphs 1 through 12 of the Indictment are incorporated by reference as if fully set forth herein.

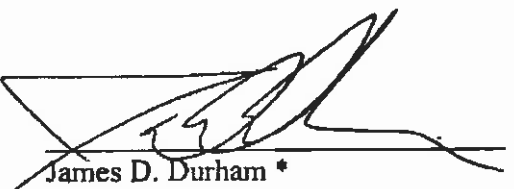
14. On or about May 26, 2011, **Floyd B. Sawyer, Jr.** in Chatham County, within the Southern District of Georgia, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of a department or agency of the United States, by stating to agents with the Federal Bureau of Investigation and Drug Enforcement Agency that while serving as off-duty security for a Savannah night club he had never taken a cell phone or pills from a patron of the club. The statements and representations were false because, as he then and there well knew, Defendant Sawyer, on or about May 22, 2010, took a cell phone and purported Oxycontin pills from a patron of the night club where he provided off-duty security.

All done in violation of Title 18, United States Code, Section 1001.

A True Bill.

Foreperson


Edward J. Tarver
United States Attorney


James D. Durham *
First Assistant United States Attorney

* Denotes lead counsel



Brian T. Rafferty
Criminal Division Chief
Assistant United States Attorney

EXHIBIT H

Dean
Fagerstrom/SCMPDCID/Sav
Ga

08/01/2008 12:48 PM

To James Dale/SCMPDProfessionalStandards/SavGa@SavGa
cc Andre Oliver/SCMPDProfessionalStandards/SavGa@SavGa

bcc

Subject Fw: Sgt. Phillips

The below incident occurred in 2006 and all documents were removed.

Please assign a number to this incident for recording-keeping purposes, thanks.

— Forwarded by Dean Fagerstrom/SCMPDCID/SavGa on 08/01/2008 12:45 PM —



Tanya
Asaro/HumanResources/Sav
Ga

08/01/2008 10:58 AM

To Dean Fagerstrom/SCMPDCID/SavGa@SavGa

cc

Subject Sgt. Phillips

City of Savannah

Disciplinary Action Log

Employee Name :	Phillips , Cedric V.	Department :	Patrol Division
Employee # :	01537	Department # :	4210
Employee Title :	Police Sergeant	Bureau :	Savannah-Chatham Metropolitan Police Department
Employee Race :	Black	Employee DOB :	[REDACTED]
Employee Sex :	Male	Employee Hired :	09/17/1991
Discipline Reason :	Violation of Policy	Discipline Date :	05/28/2006
Discipline Status :	Disciplinary Action	Administered By :	Dwane Ragan
Discipline Action :	Written Reprimand	Suspension Time :	
Final Action :	Written Reprimand	Final Suspension :	

Actions / Comments
(rich text field)

Violation of S.C.M.P.D. Rule & Regulation GO# ADM-004, Section I, General Rules of Conduct, Paragraph A Conduct Unbecoming, Number 2 (h) and Paragraph C, Respect, and Paragraph H, Truthfulness, and Paragraph K, Divulging Information, by doing the following:

Between April 29, 2006 and May 7, 2006, you at different times showed disrespect towards an officer under your supervision by sticking your tongue out at her and later asking her if she needed a hug. Both actions were unwanted and unwarranted by the officer. After a complaint of a personal nature was made against you by the officer you discussed and divulged information of a confidential nature to other unauthorized officers in your precinct outside of your chain of command causing further consternation. You were also untruthful with the investigators in this case in that you told your precinct commander as well as the investigators that you did not remember asking if she needed a hug, but that is a figure of speech you have used before. In your written statement dated May 8, 2006, you stated, "As for asking Officer ***** to

return to my officer to ask her if she needed a hug is a blatant lie and it is a shame that someone would stoop so low and make statements that they know are untrue." It is obvious that both of these statements cannot be true.

Removed from file on 11/28/06 with instructions by Charles Hall and Assistant Chief Lovett.

Supervisor Name :		Appealed to Sup :	
Sup Response :		Response by Sup :	
2nd Lev Sup Name :		Appealed to Sup2 :	
Sup2 Response :		Response by Sup2 :	
Department Head :	Dwane Ragan	Appealed to DH :	
DH Response :		Response by DH :	
Bureau Chief :	Daniel Flynn	Appealed to BC :	
BC Response :		Response by BC :	
City Manager :	Michael Brown	Appealed to CM :	
CM Response :		Response by CM :	

Document History

Created 06/05/2006 10:11 AM by Tanya Vickers
Saved 11/28/2006 03:38 PM by Tanya Asaro
06/05/2006 10:25 AM by Tanya Vickers

Personnel

DISCIPLINARY ACTION FRO.
CITY OF SAVANNAH

B-171
2620-7330-069

TO: Ptl. C. Phillips EMPLOYEE NO: 1537

DEPARTMENT: Patrol - Precinct CLASSIFICATION: Police Officer

Any appointing authority may dismiss, suspend, or demote a subordinate in the classified service for cause, upon filing with the Personnel Department a copy of the written notice furnished the employee to be removed, setting forth in detail the reasons for such actions. The dismissed employee, if holding a regular Civil Service status, shall have an opportunity to answer the charges in writing within ten (10) days, and to file with the Civil Service Board affidavits in support of such answer. Affidavits supporting an appeal shall be filed with the Board within five (5) days of the date of the hearing. All papers filed in the case shall be subject to inspection by the persons affected. If the employee is on probationary status or occupies an unclassified position, he has no right to appeal.

In accordance with the provisions of the Civil Service Act, you have been:

SUSPENDED WITHOUT PAY for 2 days, from 01-19-93 to 01-20-93

DEMOTED to the position of _____ effective _____

DISMISSED and removed from the payroll effective _____

This action is taken for the following reason(s): On 01-13-93, after receiving your 33 and going 10-23, you were asked by your supervisor for your location. You advised that you were at Bee and Victory Drive. Your supervisor then advised he was at that location and asked for your location again. You were untruthful a second time about your location. You were at your residence which is outside service area C. You have violated SPD rules and regulations 3.10 - Truthfulness and are given this two-day suspension.

Following is a list of witnesses who have some knowledge of the above:

Sgt. C. Lovett
Capt. W. J. Benyard

A copy of this written notice was personally delivered to the above person on the following date:

01/14/93
Date

C. P. Phillips
Signature of Employee

01/14/93
Date

[Signature]
Signature of Department Head

Copies: Employee, Personnel Department, Department Head, Bureau Head
Pers. No.3E

Capt. W. J. Benyard
1-14-93

✓

CITY OF SAVANNAH
WRITTEN REPRIMAND

NAME Corporal Cedric Phillips

DATE November 28, 1995

DEPARTMENT Police Precinct 3

EXPLANATIONS: (Give detailed nature of Supervisor's complaint)

Corporal Cedric Phillips failed to appear in court on November 16, 1995. Officer Phillips received a subpoena for the case but still failed to appear in court. Cpl. Phillips is in violation of Rules & Regulations 10.6; Court Appearances, which states attendance at a court or quasi-judicial hearing as required by subpoena is an official duty assignment. Permission to omit duty must be obtained from the prosecuting attorney handling the case or other competent official.

REMARKS: (If any)

December 2, 1995

Cedric V. Phillips
(Employee's Signature)

Captain A. [Signature] 21 Dec 95
(Authorized Supervisor - Signature)

Approved: *[Signature]*
(Employee's Appointing Authority)

All three (3) persons must sign all copies.

Original to employee:
cc: Police Personnel File

DISCIPLINARY ACTION FORM
CITY OF SAVANNAH

TO: Cpl. Cedric Phillips
(Employee's Name)

POS. CONT. NO. 4102-1537

DEPARTMENT Police-Precinct 3

CLASSIFICATION: Patrolman

Any appointing authority may dismiss, suspend, or demote a subordinate in the classified service for cause, upon filing with the Personnel Department a copy of written notice furnished the employee to be removed, setting forth in detail the reasons for such actions. The dismissed employee, if holding a regular Civil Service Status, shall have an opportunity to answer the charges in writing within (10) days, and to file with the Civil Service Board affidavits in support of such answer. Affidavits supporting an appeal shall be filed with the Board within five (5) days of the date of the hearing. All papers filed in the case shall be subject to inspection by the person(s) affected. If the employee is on probationary status or occupies an unclassified position, he has no right to an appeal.

In accordance with the provisions of the Civil Service Act, you have been:

SUSPENDED WITHOUT PAY for Two (2) day(s), from 04-10-97 to 04-12-97
(date) (date)

DEMOTED to the position of _____ effective _____
(date)

DISMISSED and removed from the payroll effective _____
(date)

This action is taken for the following reason(s): Corporal Cedric Phillips failed to conduct an adequate investigation of an accident. Corporal Phillips violated departmental SOP 25-14 when he failed to conduct the following: Locate persons involved in the accident, Locate witnesses, Interview principals and witnesses, Examine/record vehicle damage, Record accident information, Exchange information among parties involved, and check for valid driver's license and insurance for each driver regardless of whether a report is written or not.

Following is a list of witnesses who have some knowledge of the above:

AB 17 MAR 97
Captain A. Stokes, Lieutenant D. Williams, and Sergeant K. White.

A copy of this written notice was personally delivered to the above person on the following date: _____

3/12/97
Date

Cedric V. Phillips
Signature of Employee

13 MAR 97
Date

[Signature]
Signature of Department Head

Copies: Employee, Personnel Department, Department Head, Bureau Head
Pers. No. 38
(Rev. 7/88)

RECEIVED

✓ 1

EXHIBIT I

**MANUEL, DANIELS, BURKE
International, LLC**

**SAVANNAH CHATHAM
METROPOLITAN
POLICE DEPARTMENT**

INDEPENDENT REVIEW

PREPARED FOR

***W. BROOKS STILLWELL, CITY
ATTORNEY, SAVANNAH, GEORGIA***

DECEMBER 2, 2013

***MANUEL, DANIELS, BURKE
INTERNATIONAL, LLC***



**Roundhouse Square
1426 Duke Street
Alexandria, VA 22314
(703) 299-9520 (Telephone)
(703) 299-1119 (Facsimile)**

www.mdbInternational.com

License ID# 11-3133

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I. Introduction

A. Scope of the Engagement

On October 4, 2013 MDBI was engaged by the City of Savannah City Attorney to re-open and re-conduct the investigations conducted by Savannah Chatham Metropolitan Police Department (SCMPD) Internal Affairs (IA) for the purpose of: (a) determining if the IA investigations were interfered with and, if so, by whom and for what reason; and (b) determining facts that the Acting SCMPD Chief can use in making personnel and management decisions. In carrying out its investigation, MDBI was to review all documentation provided by the City Attorney regarding this matter and conduct such interviews as were deemed necessary to determine the true facts.

B. Background

This investigation concerns certain activities of law enforcement employees of SCMPD during the 2009-2010 time period. Virtually all of these activities took place in the context of narcotics trafficking investigations being pursued by elements of the Chatham-Savannah Counter Narcotics Team (CNT), a multi-agency task force founded in 1994 to serve the drug enforcement needs of the greater Savannah area.

The principal participants and their roles in the events that unfolded in 2008-2010 will be the subject of following sections of this report. Succinctly, however, this investigation revolves around the following: In June 2008 CNT began to receive information from a confidential source about a trafficking organization in the Savannah Metro area. A case was opened and one of the key players in this organization was determined to be an individual identified as James Williams. It was determined that James Williams was employed as a Correctional Officer at Coastal State Correctional Institute and that he had a brother identified as Willet Williams who was an SCMPD Officer assigned to the Patrol Division. The case targeting the James Williams organization was led by SCMPD Officer Peter Delatorre, who was on assignment to the CNT. Among numerous others on Delatorre's investigative team was SCMPD Officer Malik Khaalis, also on assignment to the CNT. The Williams case did not proceed as well as the officers had hoped it would and disturbing source information was being received indicating the possible involvement of police officers performing escort duties for drug transactions. Khaalis, who had come under some suspicion by CNT officers because of unusual behavior, such as attempting to access investigative information with no clear need to know, took part in an April 16, 2009 surveillance of James Williams. All indications to the surveillance team were that the surveillance had been compromised. When the Drug Enforcement Administration (DEA), which was also working on the Williams case, obtained toll records for Willet Williams' phone, it was learned that during the surveillance there had been seven contacts between Willet Williams and

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Khaalis. The toll records further revealed a subsequent series of calls from Willet Williams to his brother James precisely at the time that James was exhibiting alerted behavior, such as appearing to look in the vicinity of his house for the presence of surveillants. At this point the case was moved to the DEA office without the knowledge of Khaalis.

At about the same time the James Williams case was being conducted, SCMPD Officer Mike Delatorre, who was on assignment to CNT, was leading an investigation of a trafficking organization involving an individual identified as Josh Varner. There were court-ordered wiretaps on Varner and other members of the organization. Khaalis and other CNT officers performed monitoring duties on these electronic surveillances from the "wire room" at CNT. Khaalis developed a disturbing pattern of disappearing from the wire room without authorization, on at least one occasion immediately subsequent to a minimization briefing concerning a tap that was about to go live on Varner. On this occasion the first incoming intercepted call advised Varner to "drop" his phone, meaning to discontinue use of the phone. On two other occasions Varner dropped his phone shortly after a wiretap went live. CNT officers now had strong reason to believe that Varner was being tipped off by a source inside CNT. The case was moved to the DEA office, where, without Khaalis' knowledge, a fourth wiretap was initiated on Varner. On this occasion sufficient evidence was obtained to lead to eventual indictment of Varner. It was then decided to move the case back to the CNT office where it was made to appear the fourth wiretap was about to be initiated anew. In short order after the tap went live, Varner dropped his phone.

Early in 2010 Khaalis and two other CNT officers were monitoring a wiretap on a trafficking associate of Varner when a call was intercepted indicating that a meeting would be taking place between the associate and a female. Khaalis left the wire room without permission and shortly afterwards the two remaining CNT officers heard him on the police radio requesting that a patrol unit make a stop of the female's car. While the reason for this action was never determined, Khaalis at the time informed his supervisor, Lt. Russ Smith, that he had discussed the stop with the case agent, Mike Delatorre. This was almost immediately determined to be a lie.

Throughout April and May 2010 Khaalis continued to exhibit what was deemed by CNT to be suspicious behavior and in June, 2010 CNT and the FBI (which had followed this matter from a police corruption perspective), once having determined that a federal criminal prosecution would not go forward, turned over the information they had on Willet Williams and Khaalis to SCMPD Internal Affairs (IA) for administrative handling by the department. Khaalis was placed on Administrative Leave with pay for the pendency of the IA investigation. Willett Williams remained on active duty. Shortly after being placed on Administrative Leave, Khaalis agreed to take an FBI polygraph exam on the issues of: (a) whether he had warned Willet Williams that his brother James was under CNT investigation; and (b) if he had ever used his position to protect anyone involved in illegal drug trafficking. To both questions he answered "no" and on both answers he was judged to have shown deception. After an IA investigation considerably limited

4

in scope, a report was issued by IA recommending the cases against Khaalis and Williams be closed due to a failure to find any policy violations in the information furnished by the FBI and CNT. By that time Khaalis had been returned to active duty three months earlier at the direction of SCMPD Chief Willie Lovett.

Upon learning that Khaalis had been returned to duty, CNT Director Roy Harris sent a sharply worded memorandum and supplemental report dated September 24, 2010 to the Chatham County Manager, who, in turn, had it personally delivered it to Chief Lovett by the Chatham County Attorney. Upon learning in November, 2010 that SCMPD had closed the IA case and decided that Khaalis merited no disciplinary action, Director Harris made official notification with a copy of his September memorandum and report to the Georgia Peace Officers Standards and Training Council.

C. Methodology

Informed by a detailed review of documentation, to include an SCMPD IA report covered by a Letter of Transmittal dated November 16, 2010, audio tapes of interviews of Willet Williams and Malik Khaalis, and a September 24, 2010 memorandum with accompanying supplemental report authored by CNT Director Roy Harris, MDBI investigators interviewed more than two dozen individuals who were believed to have knowledge germane to this investigation.

II. Summary of Investigation

A. Concerning Sergeant Malik Khaalis

A review of records indicates that Malik Khaalis was assigned to the CNT in about 2004 and from about 2006 was assigned to the Major Case Unit of CNT. An interview of a CNT Officer characterized by Interim Chief Tolbert as having a reputation for being a strong investigator and a strong leader indicates that in his early years at CNT Khaalis was viewed as aggressive and hard working, a "go getter". As time went on, however, Khaalis' performance declined and it seemed to be that whenever he was involved in a case it would lose momentum. And, according to this individual, he seemed to be always inappropriately trying to insert himself into other officers' cases.

The focus of the MDBI inquiry concerning Khaalis is on the timeframe of approximately mid 2008 through late 2010. The exact sequence of events is uncertain because of the passage of time and imperfect memories, but it can be said that most of Khaalis' suspect activities were associated with the James Williams and Josh Varner trafficking cases. In June, 2008 CNT performed a car stop that resulted in the development of an informant (I-2) who furnished sufficient information to open a narcotics trafficking case on James Williams. Pete Delatorre was assigned as case agent and Khaalis was assigned to his investigative team. About this same time

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Pete's brother Mike (also described by Interim Chief Tolbert as a strong investigator and leader) was assigned as case agent in a totally separate narcotics trafficking case on an organization including Joshua Varner. Khaalis assisted Mike with the Varner case as his primary duties associated with the Williams case allowed.

Khaalis Comes Under Suspicion- The James Williams Case

- Shortly after the June, 2008 stop and arrest of T-2 both Pete and Mike Delatorre began to debrief T-2 at his place of incarceration, Coastal State Correctional Institute (Coastal). They were able to determine through interviews and photo spreads that the individual to whom T-2 referred was James Williams, a Correctional Officer at Coastal. Once the identification of the subject was established in late 2008, Lt. Russ Smith, CNT, authorized the opening of a case to be assigned to Pete Delatorre.
- During an early interview of T-2 at Coastal, Pete Delatorre was accompanied by Khaalis. Khaalis recalled T-2 saying that James Williams had claimed to have a police officer, who was his brother, "in his pocket". At the time Khaalis assumed T-2 to be referring to Willet Williams, a Star Corporal on the SCMPD.
- Not long after the opening of the Williams case, Pete Delatorre conducted a briefing for the major case team. Delatorre made clear in the briefing that James Williams had a brother, Willet, who was an SCMPD officer and a subject of the case. He specifically asked if any member of the team knew Willet.
- Khaalis never made it known that he had a relationship with Willet Williams.
- On April 16, 2009 Lt. Smith concluded that not much had been happening on the Williams case and he made a last minute decision to order a surveillance of James Williams for that afternoon, to begin at James' place of employment, Coastal. Khaalis, Mike Delatorre and others were on the surveillance team.
- While waiting for Williams to depart Coastal, Khaalis suggested to Delatorre that he (Khaalis) contact Willet Williams to determine the location of the subject, who had not appeared at the expected time. This suggestion was rejected.
- James Williams finally departed Coastal at approximately 1730 and returned to his home. At approximately 1825 he exited his house and began to show alerted behavior, walking with a cell phone to his ear and acting as though he was looking for something.
- At this point the CNT team became convinced that their surveillance had been compromised, but they could not figure out how.
- On April 17, 2009, the day after the compromised surveillance, Pete Delatorre was approached by Khaalis who wanted to know if telephone toll records would be requested

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for Willet Williams' phone. He was told that Lt. Smith had made a decision to not do so in view of Williams' status as an active duty police officer.

- DEA, however, unbeknownst to Khaalis, had requested Willet Williams' toll records.
- Review of the actual records reveals that when the requested toll records for Willet Williams were examined in May, 2009 they showed seven contacts between Williams and Khaalis between 1708 and 1713 on April 16, 2009. This was precisely the time that the CNT surveillance team was outside Coastal waiting for James Williams to make an appearance.
- A review of the actual toll records also shows three contacts between Willett Williams and James Williams between 1825 and 1826 on April 16, 2009. This was precisely the time that James Williams was observed exiting his residence with a phone to his ear and appearing to search for something.
- Once the contacts between Khaalis and Willet Williams were brought to the attention of CNT Director Roy Harris, Khaalis was considered a suspect in leaking information. Director Harris decided to move the Williams case to the DEA office, unbeknownst to Khaalis or even Lt. Smith. DEA assisted in getting the word out that the Williams case had died out and that Pete Delatorre was assisting DEA on other matters. Pete continued to surreptitiously work the case from the DEA office. He returned to CNT in early July, 2009 specifically for the purpose of keeping an eye on Khaalis, who was now working on other cases. Khaalis often sought to obtain from Pete updates and information about the Williams case, but was told that it had died down. In August Pete once again returned to the DEA office in order to work on the Williams case without Khaalis' knowledge.
- During this period Mike Delatorre's cases on Josh Varner and his associate, Hezekiah Murdock, were heating up and Khaalis had been assigned to assist in those investigations. Despite having been told that the Williams case was no longer active, Khaalis continued to seek information about what was going on in that case.
- When Khaalis was interviewed on October 28, 2013 and allowed to inspect the April 16, 2010 Willet Williams toll records he admitted that he had been in contact with Williams on that date, but he insisted that the purpose of these contacts was not to warn Willet of the James Williams surveillance. He also insisted that the surveillance had not occurred on April 16, 2010 and that records indicating that were in error.

The Joshua Varner Wiretaps

In January, 2010 CNT attempted to initiate court ordered wiretaps on Joshua Varner.

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- The first attempt took place on January 27, 2010. During the minimization briefing given by the lead attorney, a DEA Task Force Agent who was present noted that when Varner was mentioned as the target of the wiretap, Khaalis became very alert and looked shocked. Shortly after the briefing Khaalis left the CNT office without authorization and nobody knew where he had gone, despite the fact that he was assigned to be a monitor in the "wire room" until 1700. He returned to the wire room at about 1700 and just then the line became active. The first incoming call intercepted was a warning to Varner to "drop his phone", in other words, to discontinue use of that phone. The caller could not be identified.
- Two subsequent attempts to intercept new numbers being used by Varner ended immediately with "dropped phones". In each of these attempts Khaalis was assigned to the monitoring teams.
- After the failure of the third CNT wiretap a decision was made with the knowledge of only Director Harris, Mike and Pete Delatorre and DEA Agent Mike Sarhat that a fourth attempt would be made, but out of the DEA office. After 4-5 days they had obtained enough evidence to support an indictment of Varner and then moved the tap back to CNT in an attempt to establish who was warning Varner. Khaalis was working in CNT during this period and agitating against DEA, saying that they were withholding information from CNT. A mock minimization briefing was held at CNT to make it appear this was a new wiretap. The phone was dropped shortly after the minimization briefing, but no incoming warnings to Varner were detected and the source of the leak was never determined.

The Hezekiah Murdock Wiretap and the Car Stop

In February of 2010 a court ordered wiretap of Josh Varner associate Hezekiah Murdock was initiated.

- Khaalis was assigned as a monitor in the CNT wire room on February 13, 2010 along with CNT officers Larry Harris and Charles Guyer. A call was intercepted indicating that Murdock would be meeting with a female within the hour. Khaalis immediately announced he was going to leave the wire room, either giving as his reason that he was going to get something to eat or that he wanted to effect an identification of the intercepted female. In either case, Khaalis left the wire room without authorization.
- Khaalis was soon heard on his police radio requesting that a marked SCMPD patrol unit stop the female's car for the purposes of effecting an identification. The car was stopped.

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- Guyer immediately called Khaalis on his cell phone and asked what he was doing and whether Khaalis had prior permission from the case agent (Mike Delatorre) or the supervisor (Lt. Smith). Khaalis' response was "yes and no".
- Lt. Smith soon received a concerned call at home from the patrol officer's sergeant demanding to know what the probable cause had been for the car stop. This was the first Lt. Smith knew about this incident. He then received a call from Khaalis, who gave his rationale for requesting the stop as wanting to be present for a possible drug transaction between two subjects. He also told Lt. Smith that he had talked to case agent Mike Delatorre.
- Mike Delatorre never spoke with Khaalis about this car stop prior to its occurrence and never gave his authorization.
- Lt. Smith called Khaalis into his office and demanded his explanation for leaving the wire room and requesting a car stop. At this time Khaalis admitted leaving the wire room without consulting with anybody about requesting a car stop. He told Lt. Smith that he was just trying to be "pro-active". When questioned about why he had told Lt. Smith that he had talked with case agent Mike Delatorre about stopping the car, he said that he did not know why he had said that, that he wasn't really thinking about it.
- Before the initiation of any CNT Title III wiretap investigation, to include this investigation, a briefing was given to the participating agents regarding minimization. The briefing also specifically provided that no pro-active enforcement action was to be taken without prior consultation with the case agent or the supervisor.

Khaalis Attempts to Learn Protected Investigative Information

CNT has a rule (for reasons of security) providing that only the case agent, the assistant case agent and others given specific permission are allowed to gain access to pertinent information concerning targets.

- During the latter part of 2009 Khaalis began a pattern of asking a CNT intelligence analyst for information about subjects in the Murdock and Varner cases. In one particular instance Khaalis tried to obtain information regarding a person of investigative interest, saying that the information was for (case agent) Mike Delatorre. When he was denied access to the information, Khaalis attempted to obtain it from two other analysts. A check with Mike Delatorre determined that Delatorre had given Khaalis no permission to ask for the requested information. The analysts were instructed by Delatorre not to give Khaalis any information associated with the Murdock investigation.

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- This matter was brought to the attention of Lt. Smith, who questioned Khaalis about his unauthorized attempts to access case sensitive information. Khaalis' response was that he had no explanation for trying to learn information about targets of the Murdock investigation.

Khaalis Attempts to Tamper With Evidence

Standard Operating Procedure (SOP) at CNT regarding cell phones seized from arrested subjects is that as soon as possible the phones are to be placed into the possession of analysts so that data of intelligence interest can be downloaded. In at least four separate instances Khaalis attempted to violate SOP.

- During November 2009 a subject named Blackshear was arrested and Khaalis and another CNT officer responded to the scene. They seized phones and put them into the possession of Analyst Don Wood. Soon after receiving the phones, Wood received a call from Khaalis instructing him not to download the phones and telling him to place the phones on his (Khaalis') desk. Wood did place the phones on Khaalis' desk, but not before downloading the data. In January 2010 Officer Eric Broome, assigned to DEA, requested the phones. Broome discovered that at some point after the phones had been turned over to Khaalis to place into evidence storage, numbers had been deleted from the call history.
- A trafficker who regularly traveled between Atlanta and Savannah was arrested and his phone was seized. Immediately after Wood received the phone for downloading, he was approached by Khaalis who began asking if Wood was going to be able to determine who had been calling the subject on the phone. Wood found this to be odd since it was SOP to download seized phones for that type of intelligence information.
- A subject named Harris was arrested and two phones were seized. Before Wood could take possession of the phones, Khaalis grabbed both of them. Wood stopped Khaalis from taking the phones away and took possession.
- A second subject arrived at the scene of the Harris arrest. While this subject was in handcuffs, Khaalis attempted to take a cell phone out of his pocket. Again, he was stopped in this attempt.

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Khaalis Responds to Planted Information

In early March 2010 Khaalis went out of the Savannah area for military training. DEA, FBI and CNT decided to take advantage of the opportunity to place a GPS tracking device on Khaalis' CNT car. The FBI obtained authorization for placement of the device and it was installed.

- When Khaalis returned from military training and realized that his CNT car had been moved from the maintenance garage where he had left it to the CNT lot, he became very upset. Khaalis was observed in the lot doing a detailed search of the car as though he was looking for something in particular.
- After this Khaalis refused to drive the car until he was finally instructed by Lt. Smith to stop using the CNT pool cars and resume use of his issued car.
- A joint FBI, DEA, CNT effort was undertaken to have a cooperating DEA source telephone into CNT with spurious information about a drug related money transaction to take place at a motel near the airport. CNT made arrangements to ensure the call would be taken by Khaalis on March 23, 2010. Khaalis took the call, but reported it to his supervisor.
- A second call was placed by the source to Khaalis on April 2, 2010. This time Khaalis did not report the call to his supervisor. Instead, he said he was going home to get something to eat. The GPS tracking device showed that instead of going home, he actually proceeded to the site near the airport where the source had told him a money transaction would take place.

Khaalis as "Walk About Jones"

During the period of the Varner and Murdock wiretaps, Khaalis developed a reputation for disappearing from the CNT office for extended periods of time with nobody being aware of his whereabouts. One example involved his disappearance shortly after the minimization briefing on the Josh Varner tap, even though he was scheduled to be on duty as a monitor in the wire room. Nobody knew where he had gone, but as soon as he returned the phone was dropped. A second example was his unauthorized departure from the wire room during the Murdock wiretap when he requested a car stop. By this point his reputation for "jumping out" of the wire room had become so pronounced that he was given the nickname by CNT Officer Charles Guyer of "Walk About Jones". (It is to be noted that Lt. Russ Smith was aware of Khaalis' behavior, was becoming increasingly frustrated and was complaining to CNT Director Harris. But Smith had been deliberately kept in the dark about the investigation of Khaalis by Harris, who instructed Smith to ignore the unacceptable behavior. It was not until after the February 13, 2010 car stop incident and Smith's insistence that Khaalis be removed from CNT that he was briefed.)

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Khaalis Shows Deception on FBI Polygraph

On June 9, 2010 Khaalis voluntarily took a polygraph exam administered by an FBI polygrapher. A review of the results follows:

- Question 1- "Did you warn Willet Williams that his brother was under investigation by CNT?"
Answer - "No"
Result - Deception Indicated
- Question 2- "Have you ever used your official position to protect anyone involved in the trafficking of illegal drugs?"
Answer- "No"
Result- Deception Indicated

B. Concerning Star Corporal Willet Williams

Star Corporal Willet Williams is a 27 year veteran of the SCMPD. His known involvement in the matters currently under investigation is mostly related to his association with the activities of his brother, James Williams, the subject of a joint CNT-DEA drug trafficking investigation. The investigation of James Williams had its genesis with the development by CNT of an informant, referred to hereinafter as T-2, in June, 2008. (It is noted that T-2 is a source of undetermined reliability, but who furnished much reliable and corroborated information to Officers Pete and Mike Delatorre.) T-2 told of twice traveling in the company of a known trafficker identified as Percy Anderson, aka "Piggy", to a Savannah residence later identified as that of James Williams where drug purchases occurred. On both occasions after the drug transaction was completed, they were escorted away from the residence by a marked police unit driven by a uniformed police officer.

Willet Williams Tentatively Identified

- In February, 2009 T-2, who at that time was incarcerated at the Chatham County Jail, told of an incident that occurred on or about January 19, 2009 when both he and "Piggy" had been incarcerated in Coastal State Correctional Institute. He explained that this was the day before President Obama's inauguration and that he and Piggy had been watching TV news. The news broadcast was showing Savannah police officers boarding a bus. T-2 related that he immediately recognized one of the officers in a blue warm up as the individual who had escorted Piggy and him away from the James Williams residence after drug transactions.

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- Also in February, 2009 T-2 advised that Piggy told him at the time that the individual in the blue warm up was Sgt. Williams, "the guy I work for".
- T-2 then viewed a photo spread and selected with near certainty the photo of Willet Williams as the individual he had recognized on TV as the escort officer.

Willet Williams Participates in Compromise of April 16, 2009 Surveillance

- On April 16, 2009 CNT mounted a surveillance of James Williams from his place of employment, Coastal, to his residence. The surveillance leader was Mike Delatorre and Officer Malik Khaalis was on the team.
- Members of the surveillance team concluded from the alerted behavior of James Williams that the surveillance had been compromised, but they did not know how.
- A review of toll records for Willet Williams phone, which had been obtained by DEA in May, 2009, revealed that in the minutes leading up to James Williams' departure from Coastal there were seven contacts between Willet Williams and Khaalis.
- The toll records further revealed three contacts between Willet Williams and his brother James Williams precisely at the time that James Williams was demonstrating alerted behavior outside his residence.
- Subsequent to exhibiting alerted behavior, James Williams departed his residence, taking all but one of surveillance team with him. A short while later a white vehicle, believed by the lone remaining surveillant to belong to Willet Williams, pulled into the residence garage and the door was closed. Although the surveillant was not able to effect a positive identification of the driver of this vehicle, he believed it to be Willet Williams.

Willet Williams Comes to the Assistance of James

- In mid 2008 Piggy Anderson and James Williams were driving in Williams' car and were pulled over by SCMPD Officer Kendall Brown. Anderson was found to be in possession of drugs hidden on his person, but no other drugs were found in the car. After receiving a call from James, Willet responded to the scene. Piggy Anderson was arrested, charged, and eventually sentenced to 22 months in prison. James Williams was cited for a seatbelt violation and released.
- During his interview on October 23, 2013 Williams said that he did respond to the scene, but only because he wanted to take custody of his brother's car in the event he was arrested. He denied trying to use his official position to influence the outcome. The patrol

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officer, Kendall Brown, was interviewed and could not recall the car stop in question. He also could not recall Willet Williams trying to intercede on behalf of his brother James.

Willet Williams, Landlord

Unrelated to Willet Williams' possible involvement in improper activities associated with his brother, James, he was also the subject of a financial fraud investigation in 2008.

- In 2008 Williams was the owner of several "Section 8" housing properties. Section 8 of the Housing Act of 1937 provides for the payment of rent subsidies to landlords who rent to qualifying low income renters.
- Williams and a Section 8 qualified renter sent the necessary paperwork to the Department of Housing and Urban Development (HUD). In short order, monthly subsidy checks began to be deposited in Williams' bank account.
- At some point, after Williams had received about \$5,000 in payments, an inspection by the Savannah Housing Authority (SHA), which administers the Section 8 program for HUD, discovered that the qualified renter had never moved in and instead an individual paying full rent was residing at the property.
- The United States Attorney considered federal prosecution, but eventually declined prosecution when Williams made full restitution. Shortly thereafter the SCMPD fraud case was referred to Internal Affairs. The case officer, Bobby Chandler, was told by SCMPD Chief Berkow and his Assistant, Willie Lovett, that the criminal case was to be closed because Williams had paid back the money.
- About two weeks after Chandler had been told to close the Williams case, he was notified that he was transferred to the Patrol Division and that he should report immediately, not even taking time to resolve pending cases.
- Earline Davis, Executive Director of SHA, was confronted by Willet Williams shortly after her notification by letter that he had fraudulently received federal subsidy money and would have to make restitution. Williams belligerently complained about being accused of fraud and shouted that he would see her in court. Davis was very upset by Williams' behavior and made a complaint to Chief Berkow.
- Davis later questioned Chief Berkow about why Williams had not been fired. Berkow replied that since Williams had paid the money back, he had only been reprimanded for his treatment of her. Review of disciplinary records contained in the IA Report reveals

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that Williams was reprimanded for conduct unbecoming an officer in 2007, but no disciplinary actions are noted for 2008.

- When interviewed on October 23, 2013 Willet Williams stated that he had not realized he had received the improper rent subsidy payments because they were deposited in an account handled by his wife. He denied inappropriate behavior with Ms. Davis, saying that she falsely accused him of trying to intimidate her.

C. Concerning Internal Affairs

One of the chief tasks set out for MDBI in the letter of engagement was to determine if there had been interference in the IA investigation. The short answer is that no evidence of interference was found. The problem is this turned out to be a somewhat irrelevant issue. As the MDBI inquiry went forward it became increasingly clear that there was no IA investigation in the commonly understood sense of the word. If that itself resulted from interference, none was discovered. IA first learned of the Khaalis and Willet Williams matter on June 3, 2010 when IA employees Major Dean Fagerstrom, Lt. Andre Oliver and Sgt. Tim Thompson were instructed by Chief Lovett to report to the Savannah FBI office where they received a briefing by FBI and CNT personnel. The IA case was closed on November 16, 2010. During this five and a half month period IA interviewed Khaalis and Williams, took one written statement from Lt. Russ Smith, were briefed once at the IA office by CNT Officers Mike Delatorre and Eric Broome, met twice with FBI Agents Larry Greene and Josh Hayes and briefed Chief Willie Lovett twice. More detailed information regarding this "investigation" follows.

The June 3, 2010 Meeting

- By the end of May, 2010 CNT and the FBI had decided to bring the cases against James Williams and Varner as well as those on Willet Williams and Khaalis to a close and invited members of SCMPD to the FBI office for a June 3, 2010 meeting. At this meeting the FBI provided a detailed oral briefing about the investigations CNT and the FBI had been conducting concerning Khaalis and Willet Williams.
- Fagerstrom, Oliver and Thompson professed to be puzzled as to why IA was being brought into this matter since IA does not normally get involved until a criminal investigation has been concluded. It appeared to them that a criminal investigation was still underway.

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The Interview of Khaalis

- At the conclusion of the June 3, 2010 meeting at the FBI office, FBI Agent Josh Hayes, who had provided most of the briefing, departed for the CNT office for the purpose of interviewing Khaalis. Hayes suggested that IA also conduct an interview of Khaalis. At the instruction of Major Fagerstrom, Oliver and Thompson went to the CNT office, watched Hayes interview Khaalis from a control room and then conducted a recorded IA interview of Khaalis.
- Thompson and Oliver were resentful at being placed in such a position. They felt they had been given no time to prepare and had no idea whether Khaalis' responses were truthful or not. They believed they were just being used by the FBI and CNT to try to extract a confession from Khaalis.
- IA never interviewed Khaalis again, even after they had had time to prepare.

The Interview of Willet Williams

- Again at the instruction of Fagerstrom, Oliver and Thompson proceeded from the CNT office to the IA office for the purpose of interviewing Willet Williams. Thompson and Oliver again believed they had been given no time to prepare and the interview was "minimal", lasting, an estimated 20 minutes.
- IA never interviewed Williams again, even after they had had time to prepare.

The Second CNT Briefing of IA

- About two weeks after the FBI briefing, or in about mid-June, 2010, Pete Delatorre and Eric Broome went to the IA office to give Oliver and Thompson a more detailed briefing. They learned that Major Fagerstrom had been transferred from IA and replaced by Captain Hank Wiley. Delatorre viewed this as a bad development because Wiley was widely viewed as being very close to Chief Willie Lovett and Delatorre feared the IA case would not be pursued.
- At this second meeting Delatorre and Broome turned over to IA everything that CNT had up until that point prepared on Khaalis and Willet Williams.
- During the course of the briefing Oliver and Thompson made disparaging remarks such as "you guys don't have anything" and "you're making this stuff up".

IA Discounts Toll Record Information

- Thompson and Oliver had understood from the June 3, 2010 briefing by the FBI that toll records on Willet Williams' phone showed that Khaalis had been in contact with Willet Williams during the April 16, 2009 surveillance of James Williams and that Willet had then been in contact with James. When Thompson had a chance to analyze the actual toll records, he concluded there was too much difference in time to indicate the likelihood that the calls had led to compromise of the surveillance.
- According to MDBI's review of the toll records, there were seven contacts between Khaalis and Willett Williams in the minutes leading up to James Williams' departure from Coastal Correctional Institute (four calls were initiated by Williams, three by Khaalis). 72 minutes later, after James Williams had arrived at his residence, there were three contacts between Willet and James at precisely the time that James exited his residence and appeared to be looking for surveillance (one call was initiated by James and two by Willet).
- MDBI has difficulty understanding how IA could have concluded that these contacts could not have been associated with compromise of the surveillance.

The Second Meeting at the FBI

- Sometime in the summer of 2010 (probably late June or early July), Captain Hank Wiley, Thompson and Oliver went to the FBI office for a second briefing by Agents Greene and Josh Hayes. At this meeting the FBI stated that they would never again work a case in which Khaalis would be a potential witness. Nothing new was discussed at this meeting, but Agent Hayes either handed over some notes from the FBI's investigation or said that he would send notes. A decision had been made to not prosecute Khaalis federally, so a prosecutive report had not been prepared and was not available.
- After this second FBI meeting Thompson gave Chief Lovett a briefing, to include discussion of the phone toll records associated with the April 16, 2009 James Williams surveillance; the details of Khaalis leaving the wire room during the Varner/Murdock investigation; and the fact that Khaalis had failed an FBI polygraph exam. Regarding the last, Chief Lovett commented he did not believe in polygraph exams.

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FBI Interview Reports

- On July 27, 2010 the FBI hand-delivered to the IA office summaries of interviews of Mike Delatorre, Charles Guyer and Larry Harris concerning the February 13, 2010 incident where Khaalis had initiated an unauthorized car stop.
- After reviewing the FBI interview summaries, Captain Wiley briefed Chief Lovett on July 27, 2010. This appears to have been the last briefing IA gave to Lovett on the Khaalis/Williams matter.

Khaalis Returns to Active Duty

- After the July 27, 2010 briefing, Chief Lovett instructed Wiley to take Khaalis off Administrative Leave and return him to active duty. A review of correspondence in the IA Report, disclosed that Khaalis was taken off Administrative Leave on August 13, 2010 and assigned to a Patrol Division precinct effective August 16, 2010.

CNT Director Roy Harris' Memorandum

- After learning of Khaalis' return to duty, CNT Director Harris, the U.S. Attorney and the FBI met with Chief Lovett in his office on September 10, 2010 and gave him a detailed briefing regarding the FBI/CNT investigations of Khaalis and Williams.
- A review of records confirms that on September 24, 2010 CNT Director Harris sent a memorandum and supplemental report to the Chatham County Manager. This memo and report contained considerable investigative detail regarding the activities of Khaalis and Willet Williams that had previously been provided orally to IA in two briefings and to Chief Lovett on September 10, 2010.
- On October 5, 2010 Director Harris' memo and report were hand delivered to Chief Lovett by Chatham County Attorney Jonathan Hart.

CNT Officers Transferred

- In early October, 2010 the Delatorre brothers and Eric Broome received unofficial word that they were to be transferred out of CNT.
- According to documentation provided by Interim Chief Tolbert, on October 29, 2010 Mike Delatorre, Pete Delatorre and Eric Broome were transferred by "special order" of Chief Lovett from CNT to Patrol Division precincts.

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- While there is a policy providing for rotation of CNT officers back to SCMPD after five years, it had infrequently been adhered to because many believed it made no sense from an efficiency standpoint. CNT management personnel did not agree with the transfers of the Delatorres and Broome and could not understand them.
- It is quite unusual for the Chief to issue special orders for transfers to precincts and the transfers of the Delatorres and Broome were viewed by some as possible retaliation.

Case Closed

- On November 16, 2010 Captain Hank Wiley prepared a Letter of Transmittal (LOT) covering the completed IA Report and recommending the cases against Willet Williams and Malik Khaalis be closed and that the allegations against them be found Unsustained. The LOT was initialed by both Wiley and Lovett.

The Wiley LOT a Problem

- It is not normal procedure for IA to prepare a LOT. The SOP is for IA to send their completed Report to the subject's commander. That individual then has the responsibility for preparing a LOT and making recommendations for any disciplinary action. The LOT and Report are then sent up the chain of command for final action. That procedure was obviously not followed on this case. The IA position is that Wiley prepared the LOT because CNT would not do their job.
- Captain Paul McBurney, who, as senior SCMPD officer at CNT, should have received the completed IA report and prepared the LOT. McBurney was never contacted at all by IA and never received the IA Report for review.
- CNT personnel recounted a case of a female SCMPD officer who had lied about attendance at a training session and was fired upon the recommendation of Willie Lovett, who at the time was Assistant Chief. CNT personnel were outraged by the outcome of the Khaalis case and believed the allegations against Khaalis to be much more serious and sustained than the earlier case where the female officer was fired.

CNT and FBI Allegations Discounted

- In his LOT, Wiley stated flatly that the allegations made by CNT and the FBI failed to prove any SCMPD policy violations.

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- In the first place, MDBI notes that this is decidedly odd. Instant report documents numerous activities on the part of Khaalis that could reasonably be considered to be in violation of policies concerning AWOL, lying, insubordination, violating Title III protocols, etc. In the case of Willet Williams there certainly is evidence of possible involvement in illegal drug transactions.
- In the second place, MDBI observes that IA may be using an unusual standard of proof. They appear to be saying that because the allegations were not proven beyond a reasonable doubt, they were not sustained. But in most civil cases, administrative cases and Grand Jury cases, the standard employed is Preponderance of the Evidence. Under this standard, the burden of proof is satisfied if it is concluded that there is a better than even (51%) chance that the allegations are true. This is the standard used by the FBI's Office of Professional Responsibility and likely by most police departments in handling non-criminal misconduct cases.

The LOT Made Untruthful Representation

- The LOT unequivocally states that the City Attorney's Office was asked to review the information given to the Office of Professional Standards (IA) and concluded there was no evidence of illegal activity by Agent Khaalis.
- James Blackburn, who in 2010 was City Attorney and Peter Giusti, who was his Assistant, denied their office never received such a request and no record of such a request was found. Further, the City Attorney's Office represents Savannah in civil matters and has nothing to do with making assessments of the potential criminality of activities.
- Wiley was instructed by Chief Lovett to prepare the LOT and put in the language about requesting a City Attorney review. During this process he had no contact with the City Attorney's Office.

D. Concerning Chief Willie Lovett

Willie Lovett was promoted to Chief of the SCMPD in April, 2010 after having served as Assistant Chief and twice as Interim Chief. At the time of his September, 2013 retirement he had served the department for 40 years. During the current inquiry MDBI attempted to determine the role played by Lovett in the chain of events concerning Malik Khaalis and Willet Williams. In short, it appears that Lovett chose to have little involvement in matters and determined, by his own admission, that the allegations and evidence against Williams and Khaalis did not represent serious violations of SCMPD policy. Accordingly, he participated in relevant events as follows:

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- On June 3, 2010, when informed that the FBI and CNT were to present a briefing on possibly criminal misconduct by Khaalis and Williams, he dispatched Captain Dean Fagerstrom and two other officers assigned to IA to the FBI office to attend.
- Subsequent to the FBI presentation he received a briefing by IA concerning the allegations against Khaalis and Williams, chiefly concerning an April 16, 2009 surveillance during which Khaalis and Williams were determined to be in telephonic contact, resulting, in the opinion of the FBI and CNT, in compromise of the surveillance.
- Lovett was also briefed by IA concerning a written statement prepared by CNT LT. Russ Smith detailing the unauthorized departure of Khaalis from the CNT wire room, his initiation of a traffic stop of a subject and his subsequent lie to Smith to the effect he had discussed these actions with the case officer.
- He was briefed by IA again in July, 2010 after a second meeting with the FBI and was told that Khaalis had failed a polygraph exam and that the FBI would never again work a case in which Khaalis was involved. He was also told by IA that the FBI would provide no further documentation of their investigation.
- In August, 2010 Lovett instructed that Khaalis be returned to active duty.
- On September 10, 2010 Lovett was briefed in his office by CNT Commander Harris, the United States Attorney and the FBI regarding details of the case against Khaalis.
- On October 5, 2010 Lovett was personally given by County Attorney Jonathan Hart a detailed memorandum prepared by CNT Commander Roy Harris concerning the investigation of Khaalis.
- When interviewed by MDBI, Lovett stated that if he had seen the Harris memorandum he would have handled things differently. His attention was drawn to the fact that he had seen the memorandum.
- IA officers have stated that Lovett never shared the Harris memorandum with IA, although they heard that such a memorandum existed.
- When questioned by MDBI as to why he did not forward the Harris memorandum to IA for their consideration, Lovett had no explanation.
- By Special Order of Chief Lovett dated October 29, 2010 the Delatorre brothers and Eric Broome, who had participated in the CNT investigation of Khaalis, were transferred from CNT to patrol precincts.
- MDBI has been told that such transfers by special order of the Chief are rare and that although a policy exists for rotation of CNT officers after five years, it is rarely observed.
- Lovett stated that as Chief he did not get involved in assignment of officers to specific precincts, even though in the case of the Delatorres and Broome, the transfers to precincts came directly from the Chief's office. He denied that the transfers had anything to do with retaliation.
- In November, 2010 Lovett instructed IA Captain Hank Wiley to prepare a Letter of Transmittal, covering the final IA Report and send it to him for approval. The LOT was

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to state that the evidence presented by CNT and the FBI proved no violations of policy and that the documents received had been reviewed by the City Attorney's Office, who could find no evidence of illegal activity by Khaalis.

- There is no record of the City Attorney's Office conducting any such review; the City Attorney (at that time) and his Assistant (at that time) deny being consulted in this matter; the County Attorney only recalls meeting with Lovett for the purpose of delivering the Harris memorandum and does not recall giving legal opinions regarding illegal activity by Khaalis.
- On November 16, 2010 Lovett initialed the LOT, finding that all allegations of violations by Khaalis and Williams were unsustainable.
- Lovett stated that the handling of this LOT was irregular and that SOP was that Captain Paul McBurney at CNT should have prepared the LOT. It was his belief, however, that McBurney would not have done anything with the information in the IA Report.
- During his MDBI interview, Lovett stated that he based his decision to exonerate Khaalis on a "one page report" he had been given. This report was determined by MDBI to be a one page surveillance log concerning the April 16, 2009 surveillance of James Williams, with an attached document showing details of telephone contacts between Khaalis and Willet Williams and Willet Williams and James Williams.
- While Khaalis was on Administrative Leave, Lovett allowed him to take the exam for Sergeant and at some subsequent point promoted him to that rank.

During the course of the MDBI inquiry, representations relating to Chief Lovett, but extraneous to the Khaalis/Williams matter were brought to the attention of the investigators. Examples follow:

- Major Geraldine Long was forced into retirement by Lovett because of a disagreement involving wearing of "mourning bars" at a funeral. Lovett explained that he had ordered that the mourning bars not be worn because the deceased had not died in the line of duty. He received word that Long had countermanded his order, resulting in him (Lovett) instructing that an IA investigation be opened.

• [REDACTED]

• [REDACTED]

• [REDACTED]

E. Concerning Cleveland Lovett

- Information was received that a former SCMPD Officer, Kendall Brown, effected a drug-related arrest of an individual determined to be the step son of Cleveland Lovett, nephew of Chief Willie Lovett. At the time Cleveland Lovett was a Sergeant in SCMPD IA. The information indicated that subsequent to this arrest Lovett initiated a campaign wherein he opened numerous spurious IA investigations of Brown, culminating in Brown resigning from SCMPD.
- It was determined that only one IA investigation of Brown took place subsequent to the November, 2005 arrest and that the case occasioning Brown's departure from SCMPD was a complaint of use of excessive force. The validity of the complaint was corroborated by others.
- Further, no evidence was discovered indicating that Lovett attempted to influence events at the scene of his step son's arrest or that he engaged in any form of retaliation against Brown.

III. Conclusions and Observations

Law enforcement is a difficult and often dangerous profession. Unit cohesion is essential to the accomplishment of the mission and the underpinning of such cohesion is an implicit trust in the integrity of one's colleagues. Police officers assigned to elite elements such as CNT draw much of their strength and confidence from their association with individuals working toward a common goal. Once a member of the team begins to display bizarre behavior and take actions that lead him to be suspected of consorting with the opposition he becomes a distraction and over time this inevitably results in a diminution of the essential bond of trust. This undeniably occurred at CNT when it was discovered that Khaalis had contacted Willet Williams during a surveillance and then Willet contacted the target of the surveillance, effectively compromising the operation.

As MDBI investigators reviewed documentation and carried out interviews several things became apparent. The first thing is that during the period under review CNT was staffed by some extraordinarily talented and industrious officers. Of particular note, Interim Chief Tolbert pointed out that the Delatorre brothers and Eric Broome were viewed as strong investigators and it is obvious that they were strong leaders. The second thing that became clear was that inexplicable things began to hinder important investigations and because Khaalis and, to a somewhat lesser degree, Willet Williams became prime leak suspects, CNT and DEA were forced to expend what should have been an unnecessary amount of effort on non-mission related activities. For example, time and effort were spent moving cases from CNT to DEA and then back in an attempt to protect investigative information and unearth the leaker; time was spent

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placing and monitoring a GPS device on Khaalis' car; Khaalis' activities within CNT were regularly monitored; and, for reasons of operational security, key management officials such as Lt. Russ Smith and Captain Paul McBurney were kept in the dark. This last item caused many difficult situations, such as an increasingly frustrated Lt. Smith being told by Director Harris to take no action regarding unacceptable behavior by Khaalis and Lt. Smith becoming upset with Pete Delatorre when he, with the approval of Director Harris, made it appear that the James Williams case was not being pursued.

During interviews of IA personnel it was often said that CNT should have taken care of its own disciplinary problems at the time they manifested themselves. But the organizational structure interfered with that. CNT operates in a task force environment and during the time under review was working cases jointly with DEA. Because Khaalis and Willet Williams were suspected of activities that could have been criminal in nature, decisions were taken to delay administrative action so as not to compromise the criminal investigation. If Director Harris had had the authority to terminate Khaalis, he may have done so. But he had no such authority under the CNT charter. Eventually, when it was determined there would be no criminal prosecutions, the Khaalis and Williams matters were turned over to SCMPD IA., who gave evidence of being resentful from the beginning.

Because integrity is the glue that holds highly cohesive organizations such as police departments together, law enforcement agencies have traditionally recognized the extreme importance of having internal affairs elements which are recognized as being impartial, unrelenting, but fair. It is essential that IA investigations be seen as thorough, open minded and timely. None of that seems to have occurred here. As has been noted earlier, the investigation was pending for more than five months; practically no work at all is evident from the record after day number two; compelling evidence was disparaged and dismissed; no information was independently developed by IA; Khaalis was brought back from Administrative Leave by Chief Lovett three months before the IA report was finalized; the Letter of Transmittal covering the final report was prepared by IA itself, an aberration from normal procedure; Khaalis' superior SCMPD officer at CNT was never contacted by IA and never given an opportunity to review the report or prepare recommendations; the LOT falsely stated that the information that formed the basis for the report had been reviewed by the City Attorney's Office; Khaalis and Williams were exonerated due to a failure of the allegations by the FBI and CNT to prove any violations of policy; and, finally, the three officers who had been the backbone of the James Williams and Josh Varner cases and who had participated in the investigation of Khaalis were transferred out of CNT by what has been characterized as an unusual special order of Chief Lovett. One of these officers is still with SCMPD. One has taken law enforcement employment elsewhere. One has taken his own life. Khaalis has been promoted to Sergeant and Willet Williams remains a Star Corporal.

Finally, whether because of personal animosity with the CNT Director, failure to understand the seriousness of the issues involved, reluctance to take decisive action or any number of other

possible reasons, Chief Willie Lovett failed in this matter to provide the strong and moral leadership demanded by his rank and position.

IV. Findings

In inquiries such as this, bringing absolute clarity to the issues at hand is rarely achievable. Individual recollections of events often differ; and this may be due to personal agendas, perceptions of self interest, or simply faulty memories. Similarly, certain actions can be undisputed, but it may be impossible to impute with certainty the motives behind such actions. And records may establish beyond any doubt that two parties were in telephonic contact, while the substance of any conversation can never be known.

All this is by way of saying that MDBI has not been able to arrive at any significant findings that meet the criminal ("beyond a reasonable doubt") standard. But by employing what MDBI considers to be the more appropriate "preponderance of the evidence" standard (a reasonable person determines there is a better than even chance that a proposition is true), numerous relevant findings become possible. Key among these is as follows:

1. As early as 2008 Khaalis was aware that an informant had provided information that James Williams claimed to have a brother who was a police officer and who was "in his pocket". Khaalis, by his own admission, knew that this police officer was Willet Williams.
2. At this point Khaalis knew and had contact with Willett Williams, but never made mention of this fact to his CNT colleagues or supervisors.
3. Once a criminal case was opened on James and Willet Williams by CNT, the case officer specifically asked the investigative team, to include Khaalis, if anyone knew Willet. Even at this point Khaalis declined to reveal his association with Willet Williams.
4. During an April 16, 2009 surveillance of James Williams, Khaalis suggested a contact with Willet, but was told by the case officer not to establish such contact.
5. Despite these instructions, Khaalis had seven telephonic contacts with Willet Williams during the surveillance of James Williams.
6. Khaalis never told anyone of his contacts with Willet Williams on this occasion, but later made attempts to ascertain if Willet's toll records would be subpoenaed.
7. **Khaalis deceitfully withheld critical information from his CNT superiors and colleagues proceeded against the instructions of the case officer and/or surveillance leader and probably provided case-related information to a subject of the investigation.**

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8. **When the toll records of Willet Williams were examined it was determined that not only did he have repeated contact with Khaalis during the April 16 surveillance, he subsequently had three telephonic contacts with his brother, James, at precisely the time that James was exhibiting alerted behavior. MDBI believes it likely that James was given surveillance-related information by Willet during these contacts.**
9. On January 27, 2010 Khaalis attended a minimization briefing at CNT concerning the initiation of a wiretap on Josh Varner. Immediately after the briefing Khaalis disappeared from the "wire room", even though he was assigned to the monitoring shift. The first intercepted incoming call warned Varner to discontinue use of his phone.
10. Two subsequent attempts to wiretap Varner failed in a similar fashion. Khaalis was a member of the monitoring team on these occasions.
11. A fourth wiretap was run out of the DEA office without Khaalis' knowledge and this time sufficient information was obtained to secure an indictment.
12. When the fourth wiretap was moved back to the CNT wire room with Khaalis as a monitor, Varner promptly discontinued use of his phone.
13. **It is considered likely that Khaalis either personally or through a third party warned Varner that his phone was being tapped.**
14. On February 13, 2010 Khaalis was assigned as a monitor in the wiretap of Hezekiah Murdock when a call was intercepted arranging for a meeting between Murdock and a female. Khaalis left the wire room without permission and caused traffic stop of the female, thus jeopardizing the investigation.
15. When questioned by his supervisor, Khaalis said that he had discussed the traffic stop with the case officer. The case officer later denied he had been contacted by Khaalis prior to the stop. Khaalis subsequently admitted to his supervisor he had not spoken with the case officer and had no explanation for saying he had.
16. **Khaalis lied to his supervisor, left his place of assignment without required permission, violated standard operating procedure by taking pro-active enforcement activity without the required permission of his supervisor and/or the case officer, and put a sensitive investigation at risk.**
17. On numerous occasions Khaalis attempted to access information concerning subjects of active investigations to which he had no right under standard CNT policies.
18. On numerous occasions Khaalis violated or attempted to violate standard CNT procedures concerning the handling of cell phones seized during the course of arrests.
19. On April 2, 2010 Khaalis received a scripted telephone call from a cooperating DEA source regarding an impending drug-related money transaction. He lied to colleagues,

PRIVILEGED AND CONFIDENTIAL ATTORNEY WORK PRODUCT

saying he was going home to eat and then drove to the scene of the supposed transaction with no notification to his supervisor.

20. **On June 9, 2010 Khaalis showed deception on an FBI polygraph examination on the issues of whether he had warned Willet Williams that his brother, James, was under CNT investigation and whether he had used his position to protect anyone involved in illegal drug trafficking activity.**
21. In July 2010 the FBI informed SCMPD that it would never again work a case with SCMPD where Khaalis would be a potential witness.
22. In May, 2013 the District Attorney for Georgia's Eastern Judicial Circuit informed SCMPD that her office would not prosecute any cases where Khaalis or Willet Williams were involved.
23. In February, 2009 a source of undetermined reliability, but who had provided reliable information in the past, tentatively identified Willet Williams as the individual in police uniform who escorted him and another individual from the scene of two drug transactions.
24. The drug transactions took place at the residence of James Williams, brother of Willet.
25. There is no evidence that Willet Williams came to the scene of traffic stop involving James Williams for the purpose of improperly exerting influence on behalf of James.
26. In 2008 Willet Williams improperly received federal rent subsidy money, but was eventually not prosecuted either federally or locally for fraud in deference to the fact that he made full restitution. There is insufficient evidence to establish that Williams knowingly perpetrated fraud.
27. In connection with the above, Williams belligerently confronted the Director of the Savannah Housing Authority, threatening to see her in court. Chief Berkow told the Director Williams had been reprimanded for his behavior. No record of such a reprimand was found on the record, although the record does indicate two reprimands for conduct unbecoming an officer in 2007.
28. Statements from numerous individuals as well as review of available documentation establish that Willet Williams has a reputation for intemperate behavior in his dealings with the public.
29. During its five and one half month investigation, IA conducted two interviews, took one written statement, attended three briefings and briefed Chief Lovett on two or possibly three occasions.
30. IA dismissed toll record information as being irrelevant based on inexplicably poor analysis.

PRIVILEGED AND CONFIDENTIAL ATTORNEY WORK PRODUCT

31. IA was apparently never given a detailed memorandum and report prepared by CNT Director Roy Harris concerning the questionable activities of Khaalis and Williams. (Said report having been hand-delivered to Chief Lovett.)
32. IA acted totally at variance with established SCMPD policy and procedure by preparing a Letter of Transmittal recommending closure of the IA case with a finding of unsustained allegations against Khaalis and Williams.
33. The LOT made the inexplicable statement that the information provided by the FBI and CNT proved no violations of SCMPD policy as well as the false statement that the information obtained had been reviewed by the City Attorney's Office which made a finding of no illegal activity.
34. **While no evidence of improper influence on IA was discovered, their handling of this entire matter was negligent and unprofessional.**
35. On the few occasions that Chief Lovett was briefed by IA he was assured that the evidence against Khaalis and Williams was thin and inconclusive and that the FBI and CNT refused to provide documentation of their allegations.
36. Shortly after his last briefing by IA on July 27, 2010, Chief Lovett ordered that Khaalis be returned to active duty.
37. In early September, 2010 Chief Lovett was given a detailed briefing in his office by the CNT Director, the US Attorney and the FBI regarding the Khaalis/Williams matter.
38. In early October, 2010 Chief Lovett was personally handed a detailed report prepared by the CNT Director regarding the Khaalis/Williams investigation.
39. Chief Lovett never forwarded this report to IA for their review and consideration.
40. In November Chief Lovett, in opposition to SOP, instructed IA Captain Hank Wiley to prepare a LOT recommending exoneration of Khaalis and Williams, falsely saying that the material received from the FBI and CNT had been reviewed by the City Attorney's Office and that there was no evidence of policy violations.
41. **Chief Lovett's performance in the Khaalis/Williams matter, whether by design or negligence, was inadequate and unprofessional. Despite the fact that he was given ample information both orally and in writing to make a reasoned disciplinary decision regarding these two men, he chose to consider only a single page surveillance log. He also withheld vital information from IA; truncated the standard procedure for handling IA reports; and instructed IA to prepare a LOT with patently false and incorrect information.**
42. **No evidence was found of improper activity by Cleveland Lovett in the matter of his nephew's arrest by Officer Kendall Brown nor was evidence found of retaliation against Brown by Lovett.**

V. Recommendations

1- The Acting Chief of Police review the content of this report, as well as the original Internal Affairs report, and determine if administrative action is warranted as it relates to departmental policies.

2- Additional investigative efforts are directed to resolve related spin-off issues pertaining to misconduct.

3- A full audit and evaluation of Internal Affairs in the SCMPD be conducted, utilizing an accredited police consultant to ascertain "best practices" and recommendations for restructuring this critical component of the department in order to restore both internal and public confidence.

VI. Appendix

A. Documents Incorporated by Reference (see attached)

1. **SCMPD Internal Affairs Report covered by November 16, 2010 Letter of Transmittal**
2. **September 24, 2010 Memorandum and Supplemental Report of CNT Director Roy Harris**
3. **Undated CNT Supplemental Report**
4. **May 7, 2013 Memorandum of District Attorney Meg Heap**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

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HENRY "HANK" WILEY III, former Director of)
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Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

Defendants.)

Civil Action Number: SPCV15-8874AB

JURY TRIAL REQUESTED

CERTIFICATION UNDER RULE 3.2

Pursuant to Rules 3.2 and 3.4 of the Uniform Superior Court Rules of Georgia, I hereby certify that that there has been a case filed in the Superior Court of the Eastern Judicial Circuit of Georgia, *Eric Henderson v. Robert Von Loewenfeldt and Mayor and Alderman of The City of Savannah, Civil Action Number: SPCV14-0825-AB* involving substantially the same parties or substantially the same subject matter or substantially the same factual issues which would require the pleading to be specifically assigned to the judge whom the original action was or is assigned..

Respectfully submitted, this 1st day of October, 2015.

THE CLAIBORNE FIRM, P.C.



WILLIAM R. CLAIBORNE

Attorney for Plaintiffs

Georgia Bar Number: 126363

410 East Bay Street
Savannah, Georgia 31401
(912) 236-9559 Telephone
(912) 236-1884 Facsimile
will@claibornefirm.com

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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HENRY "HANK" WILEY III, former Director of)
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Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-0817-AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**WILLIE C. LOVETT
C/O INMATE REGISTER NO.: 18961-021
USP HAZELTON, U.S. PENITENTIARY
1640 SKY VIEW DRIVE
BRUCETON MILLS, WV 26525**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By



(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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PETER DELATORRE,)
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ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
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Defendants.)

Civil Action Number: SPCV15 887 AB

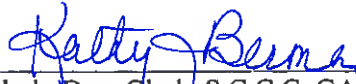
JURY TRIAL REQUESTED

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1640 SKY VIEW DRIVE
BRUCETON MILLS, WV 26525**

Filed in the Clerk's Office this 1st day of October, 2015.



Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)

)

Defendants.)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**PETE LIAKAKIS
17 EAST PERRY STREET
SAVANNAH, GA 31401**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By _____


(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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MICHAEL DELATORRE,)
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Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

Defendants.)

Civil Action Number: SPCV15-0879-AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**PETE LIAKAKIS
17 EAST PERRY STREET
SAVANNAH, GA 31401**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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Chatham Metropolitan Police Department,)
)
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Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**RUSSELL ABOLT
110 OLDE TOWNE ROAD
SAVANNAH, GA 31410**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By 
(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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PETER DELATORRE,)
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Defendants.)

Civil Action Number: SPCV15-0879-AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**RUSSELL ABOLT
110 OLDE TOWNE ROAD
SAVANNAH, GA 31410**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**MICHAEL BROWN
1 SIR LANCELOT COURT
SAVANNAH, GA 31405**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

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CHATHAM COUNTY

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Civil Action Number: SPCV15-0879AB

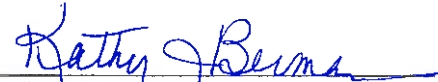
JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**MICHAEL BROWN
1 SIR LANCELOT COURT
SAVANNAH, GA 31405**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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Defendants.)

Civil Action Number: SPCV15-0879-AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**JULIETTE TOLBERT
63 CRESTWOOD DRIVE
SAVANNAH, GA 31405**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

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Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**JULIETTE TOLBERT
63 CRESTWOOD DRIVE
SAVANNAH, GA 31405**

Filed in the Clerk's Office this 1st day of October, 2015.



Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

Defendants.)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**MALIK KHAALIS
5 FONTENOT COURT
SAVANNAH, GA 31405**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By _____


(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)
Defendants.)

Civil Action Number: SPCV15-0879AB


JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**MALIK KHAALIS
5 FONTENOT COURT
SAVANNAH, GA 31405**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**WILLET WILLIAMS
1521 PENDLETON STREET
SAVANNAH, GA 31405**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By _____


(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)
vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)

Civil Action Number: SPCV15-~~0879~~AB

Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

JURY TRIAL REQUESTED

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-

Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)
)
)


Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**WILLET WILLIAMS
1521 PENDLETON STREET
SAVANNAH, GA 31405**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-2879-AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**FLOYD SAWYER
740 S. MAIN STREET, APARTMENT 42
HINESVILLE, GA 31313**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

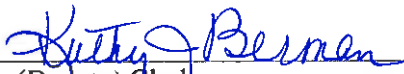
**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By _____


(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)
)

Civil Action Number: SPCV15-0879-AB

JURY TRIAL REQUESTED

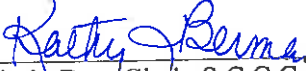
Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**FLOYD SAWYER
740 S. MAIN STREET, APARTMENT 42
HINESVILLE, GA 31313**

Filed in the Clerk's Office this 1st day of October, 2015.



Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**JAMES WILLIAMS
1463 EAST 40TH STREET
SAVANNAH, GA 31404**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:


**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By _____


(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)

Civil Action Number: SPCV15-0879AB

Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

JURY TRIAL REQUESTED

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**JAMES WILLIAMS
1463 EAST 40TH STREET
SAVANNAH, GA 31404**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)

Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)

)

)

Defendants.)

Civil Action Number: SPCV15-~~087~~AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**RODNEY GERIDO
115 MARSH EDGE LANE
SAVANNAH, GA 31419**

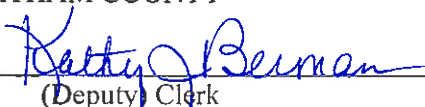
You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By 
(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**RODNEY GERIDO
115 MARSH EDGE LANE
SAVANNAH, GA 31419**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
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MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
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FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

Defendants.)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**CEDRIC PHILLIPS
291 RATHLIN ROAD
RICHMOND HILL, GA 31324**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By



(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-0879AB

JURY TRIAL REQUESTED


Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**CEDRIC PHILLIPS
291 RATHLIN ROAD
RICHMOND HILL, GA 31324**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-~~0879~~AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**ERIC HENDERSON
3812 RENWICK VILLAGE DRIVE
SAVANNAH, GA 31410**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

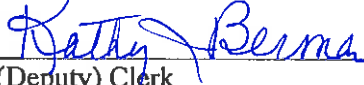
**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By


(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15-~~0879~~-AB

JURY TRIAL REQUESTED

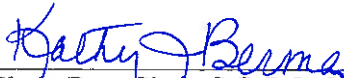
Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**ERIC HENDERSON
3812 RENWICK VILLAGE DRIVE
SAVANNAH, GA 31410**

Filed in the Clerk's Office this 1st day of October, 2015.



Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-

Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)

)

Defendants.)

Civil Action Number: SPCV15-0279-AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**GREG RAMSEY
112 SAINT ANDREWS WAY
SAVANNAH, GA 31410**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By 
(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)
)
Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)
PETE LIAKAKIS, former Chatham County)
Commission Chairman)
RUSSELL ABOLT former County Manager,)
Chatham County,)
MICHAEL BROWN, former City Manager,)
City of Savannah,)
JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)
MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)
WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)
FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)
JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)
RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)
ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)
GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)
HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)
ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)
)
)
)

Civil Action Number: SPCV15087 AB

JURY TRIAL REQUESTED

Defendants.)

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**GREG RAMSEY
112 SAINT ANDREWS WAY
SAVANNAH, GA 31410**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)

)

Defendants.)

Civil Action Number: SPCV15-8879AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**HENRY "HANK" WILEY, III
7 MAINHOUSE LANE
SAVANNAH, GA 31419**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By 
(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)

Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)

)

)

Defendants.)

Civil Action Number: SPCV15-0879-AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**HENRY "HANK" WILEY, III
7 MAINHOUSE LANE
SAVANNAH, GA 31419**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

William R. Claiborne
PLAINTIFF'S ATTORNEY

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
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MALIK KHAALIS, former Sergeant,)
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Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

)

)

Defendants.)

Civil Action Number: SPCV15-0879-AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**ANDRE OLIVER
117 MALLARD DRIVE
SAVANNAH, GA 31415**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**THE CLAIBORNE FIRM, P.C.
410 EAST BAY STREET
SAVANNAH GEORGA 31401**

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of October, 2015.

Clerk of Superior Court
CHATHAM COUNTY

By *Kathy Berman*
(Deputy) Clerk

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

PETER DELATORRE,)
MICHAEL DELATORRE,)
ROBERT VON LOEWENFELDT, and)
LAWRENCE HARRIS,)

Plaintiffs,)

vs.)

WILLIE C. LOVETT, former Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department)

PETE LIAKAKIS, former Chatham County)
Commission Chairman)

RUSSELL ABOLT former County Manager,)
Chatham County,)

MICHAEL BROWN, former City Manager,)
City of Savannah,)

JULIETTE TOLBERT, Assistant Chief of Police,)
Savannah-Chatham Metropolitan Police)
Department,)

MALIK KHAALIS, former Sergeant,)
Savannah-Chatham Metropolitan Police)
Department and Chatham-Savannah Counter-)
Narcotics Team,)

WILLET WILLIAMS, former Star Corporal,)
Savannah-Chatham Metropolitan Police)
Department,)

FLOYD SAWYER, former Officer, Savannah-)
Chatham Metropolitan Police Department,)

JAMES WILLIAMS, former Corrections Officer,)
Coastal State Prison,)

RODNEY GERIDO, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

CEDRIC PHILLIPS, former Captain, Savannah-)
Chatham Metropolitan Police Department)

ERIC HENDERSON, former Sergeant, Savannah-)
Chatham Metropolitan Police Department,)

GREG RAMSEY, Lieutenant, Savannah-Chatham)
Metropolitan Police Department,)

HENRY "HANK" WILEY III, former Director of)
Internal Affairs, Savannah-Chatham Metropolitan)
Police Department, and)

ANDRE OLIVER, former Lieutenant, Savannah-)
Chatham Metropolitan Police Department,)

Defendants.)

Civil Action Number: SPCV15-~~0979~~AB

JURY TRIAL REQUESTED

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

**ANDRE OLIVER
117 MALLARD DRIVE
SAVANNAH, GA 31415**

Filed in the Clerk's Office this 1st day of October, 2015.


Clerk, Dep. Clerk, S.C.C.C. GA

**William R. Claiborne
PLAINTIFF'S ATTORNEY**
