

TELEMASP BULLETIN

TEXAS LAW ENFORCEMENT MANAGEMENT AND ADMINISTRATIVE STATISTICS PROGRAM

December 1999/January 2000

Vol. 6, No. 7

Police Chiefs' Views and Data on Legal Liabilities in Law Enforcement

Introduction

In June of 1997, the 75th Texas Legislature created legislation which mandates 40 hours of law enforcement management and leadership training for all chiefs of police in Texas. Currently, there are over 1,050 municipal, university, college, independent school district, and special district police chiefs covered by this legislation. To implement this law, from October 1997 to August 1999, the Law Enforcement Management Institute of Texas (LEMITE), developed and offered a 40-hour management and leadership course. Police chiefs from each law enforcement agency were required to attend. The training known as the "Texas Police Chief Leadership Series," held 22 classes in 15 Texas cities between March 1998 and August 1999, averaging 42 participants per class.

The curriculum consisted of five separate modules: Ethics and Integrity (7 hours), Leadership Skills (9 hours), Value-Based Policy Development (9 hours), Emotional Survival/Malcontent Employees (9 hours), and Civil Liabilities in Policing (6 hours). Because of the perceived need for comprehensive and reliable data, the lecturers and staff administered a survey on civil liabilities in law enforcement. The survey represents the first comprehensive attempt to obtain data on this important law enforcement topic in any state in the United States. A total of 849 of 916 potential respondents voluntarily completed the instrument for a 93% participation rate. Of the 849 respondents who completed the survey, there were 808 usable surveys.

The civil liability survey consisted of 25 multiple choice questions and was administered by instructors Rolando V. del Carmen and Philip Lyons. Participants were also informed that the results of the survey would be used to further refine the curriculum for the civil liability block of instruction for the next two-year training cycle beginning September 1, 1999. They were told that the results of the survey would be made available to every law enforcement agency through the *TELEMASP Bulletin*. This issue of the *Bulletin* fulfills that promise and reports the findings of the survey.

(Note: The "n" in the results below represents the number of respondents to a particular question. The differences in the "n" means that some respondents either did not answer the question or chose other available responses in questions that had multiple possible answers.)

Results

Fear of Litigation

Previous research (Kappeler 1997) reports that police are fearful of being sued. To look into this, we asked police chiefs if such fear was justified. A majority of respondents (n=456; 56%) indicated that police fear of civil litigation was "rational and not excessive." Conversely, 42% (n=341) of chiefs said that such fear was "irrational and excessive."¹ Respondents were also queried on the impact of lawsuits and fear of lawsuits



on job performance. Over half (n=432; 53%) of respondents reported that "lawsuits or the fear of lawsuits made it more difficult for them or their officers to do their job." More specifically, while 37% (n=301) of respondents indicated that the "possibility" of being sued "greatly or moderately affected" the way their department functions, 61% (n=493) of police chiefs said the "possibility" of lawsuits only "mildly affected" or had "no affect at all" on their departmental functions.

Legitimacy of Lawsuits

Respondents were also asked about the legitimacy of civil lawsuits brought against police. A resounding 76% (n=615) of police chiefs believed that "most lawsuits filed against the police" were "not justified (frivolous)." Respondents recognized, however, that some lawsuits served to advance public policy. Fully 86% (n=691) of police chiefs agreed with the statement that "some lawsuits filed against the police help make police more professional." Respondents did not support depriving citizens the right to sue law enforcement personnel. Wholly 92% (n=740) of respondents disagreed with the statement that "members of the public should not be able to bring a civil lawsuit against the police." While Texas police chiefs support some efforts to reduce frivolous lawsuits filed against police, they apparently do not favor completely removing citizens' access to the courts even if such access involves lawsuits against the police.

Lawsuits Filed by a Member of the Public

Respondents were asked about the prevalence of lawsuits brought against police by members of the public. Only 36% (n=289) of police chiefs indicated that a member of the public had filed a lawsuit against them or one of their officers within the last three years. Overall, respondents reported that there were 630 lawsuits brought by citizens within the three year time period. Of these, respondents won 328 (78%) and lost 94, meaning that police lost 22% of cases litigated.²

There were 576 causes of action within the 630 lawsuits brought by members of the public.³ In line with previous research (Kappeler, Kappeler, and del Carmen 1993; Kappeler 1997; Scarborough and Hemmens 1999), respondents reported that assault and battery/excessive force (n=126; 22%), false arrest/imprison-

ment/detention (n=109; 19%), and unlawful searches/seizures (n=57; 10%) were the most prevalent types of issues raised in lawsuits filed by members of the public. These three categories accounted for 51% (n=292) of all causes of action brought against police. Responses also showed that police were sued based on the following grounds: infliction of emotional distress (n=43; 7%), vehicle pursuits/vehicle accidents (n=42; 7%), failure to protect (n=39; 7%), other violations (n=37; 6%), inadequate training (n=34; 6%), inadequate supervision (n=26; 5%), first amendment violations (n=23; 4%), inadequate investigation (n=18; 3%), malicious prosecution (n=16; 3%), and perjury/false reporting (n=6; 1%).

Lawsuits Filed by Officers against Police Chiefs

Police chiefs were queried if they had been sued by one of their own officers within the last three years. Only 12% (n=96) of respondents indicated that one of their own officers had brought a lawsuit against them within the last three years. Adding pending cases, respondents indicated that there were 128 lawsuits involving their own officers within this time period. Of these, police chiefs won 49 (59%) and lost 34 (41%).⁴

There were 196 causes of action in the 128 lawsuits brought by officers against the police chiefs.⁵ del Carmen (1991:245) previously identified potential "liabilities of police supervisors for what they do to subordinates," particularly involving discrimination based on religion, speech, and association freedoms, fourth, fifth, and fourteenth amendment rights, privacy rights, and discrimination based on race, color, sex, and national origin. Similarly, respondents reported that officers most frequently sued police chiefs in the following areas: sexual harassment/sex discrimination (n=49; 25%), disciplinary actions (n=47; 24%), employment discrimination (hiring, promotion, termination) (n=26; 13%), overtime/compensation/pay issues (n=19; 10%), first amendment issues (speech/political rights/religion) (n=16; 8%), race discrimination/reverse discrimination (n=13; 7%), other violations (n=9; 5%), disability discrimination (n=8; 4%), employee search/employee privacy/fourth amendment issues (n=6; 3%), and employee interrogation/questioning/*Miranda* issues (n=3; 2%).



Monetary Awards

Respondents were asked whether their officers, city, or department paid any money to plaintiffs in connection with a lawsuit filed by a member of the public in the last three years. They indicated that monetary damages were paid in 193 cases.⁶ Of the 193 monetary awards, 159 (82%) involved settlements and 34 (18%) resulted from a jury or court verdict. In all, the 159 cases settled totaled \$8,810,400, averaging \$55,411 per settlement. With respect to monetary jury or court awards, respondents reported that they paid \$3,335,409, which averaged \$98,100 per case. Because the average settlement was less than the average jury or court award, these results may explain why municipalities settle so many police lawsuits. These data suggest that the threat of paying a large monetary jury or court award and the expense of the trial are likely to induce police chiefs and their legal advisors to settle cases against members of the public.

Police chiefs were also asked whether they, the city, or department paid any money to their officers in the last three years in connection with a lawsuit filed by their officers. Approximately 10% (n=78) of respondents indicated that monetary damages were paid to their own officers.⁷ Of the 78 monetary awards, 70 (90%) involved settlements and 8 (10%) resulted from a jury or court verdict. The amount paid to settle all claims brought by officers against the chiefs of police totaled \$4,009,800, averaging \$52,283 per settlement. Jury/court verdicts totaled \$259,001 or \$32,375 per case. Unlike lawsuits filed by citizens against officers, the average settlement was more than the average jury or court verdict in lawsuits where officers sued the chief of police. This is probably explained by the strength of the employees' cases against police chiefs.

Legal Representation or Indemnification

Indemnification or legal representation in a lawsuit is one of the most unresolved issues facing law enforcement personnel (*City of Boston v. Boston Police Patrolmen's Association* 1999). To explore this issue, respondents were asked who represented them or their officers when they were sued. Some police chiefs (n=318; 39%) reported that their city attorney's office provided representation in lawsuits filed against city

police. A total of 194 (24%) Texas police chiefs indicated that they were represented by the State Attorney General's Office or staff from the Texas Municipal League Intergovernmental Risk Pool, a self-insured consortium that provides liability insurance to city and county governments. Others (n=115; 14%) reported that a private lawyer paid for by the city represented defendants in lawsuits. Some respondents reported that they or their officers had to provide their own legal representation. Around 10% (n=84) of chiefs said that they had no policy on legal representation and an additional 6% (n=49) did not know if they or their officers had legal representation during civil litigation. When monetary damages were paid, 54% (n=433) of respondents indicated that their insurance company paid. About three in 10 (n=233; 29%) chiefs reported that they had "no policy on who pays" monetary damage awards. An additional 10% (n=83) of respondents said that the city paid; only 2% (n=20) of chiefs indicated that they or their officers were responsible for paying civil damages to plaintiffs.

Policies on Police Liability

Scholars have written that lawsuits brought against police have changed policies and helped to modernize law enforcement operations (Alpert and Smith 1994; Fyfe 1988; del Carmen 1991; Kappeler 1997). To verify this claim, respondents were asked if they could "identify any policy or policies affecting the public that had been changed because of a lawsuit or the fear of being sued." Surprisingly, 550 (68%) respondents could not identify any police policy that was changed because of litigation. Only 109 (13%) respondents could identify a specific policy affecting the public that had been changed because of litigation or fear of litigation. Of the 109, high speed pursuit policies (n=71; 65%) and policies pertaining to use of force (n=32; 29%) were cited most often by chiefs.

Respondents, however, indicated that the chance of being sued impacted their decision making. For example, 62% (n=501) of police chiefs reported that the "possibility" of a lawsuit by a member of the public was a "moderate or major consideration" when making decisions affecting the general public; conversely, 37% (n=295) of respondents indicated that the "possibility" of lawsuits from the public were "not a consideration or only a mild consideration" in their decision making.



Turning to internal police operations, even fewer chiefs (n=652; 81%) could specifically identify a "personnel policy that had been changed because of a lawsuit or from fear of being sued by their officers." Only 113 (14%) of respondents could recall a specific policy affecting their officers that was changed because of a lawsuit or from fear from being sued. Of those, employment policies involving disciplinary procedures (n=21; 19%), overtime/compensation (n=19; 17%), and sexual harassment/sex discrimination (n=16; 14%) were the most likely to be changed from litigation or fear of litigation.

Responses were mixed when respondents were asked if personnel decisions were affected by the chance of being sued by their own officers. Whereas 51% (n=411) of respondents reported that the "possibility of being sued" by their own officers was "not a consideration or a mild consideration" in personnel decisions, 48% (n=385) said internal lawsuits were a "moderate or major consideration" in personnel matters.

Training on Police Liability

The United States Supreme Court (*City of Canton v. Harris* 1989) ruled that police agencies and municipalities can be held civilly liable for failing to adequately train their officers. Respondents were asked if their officers received "any type of training at all on the legal liabilities" of law enforcement personnel. A resounding 93% (n=754) of police chiefs indicated that their officers received "some training" in this area. Only 37 (5%) of respondents said that their officers received "no training at all" on the legal liabilities of police officers. The chiefs (93%) who said their officers received "some training" were asked how the training was conducted. A strong majority (n=697; 86%) indicated that "in-service lectures or seminars" was the training method most often used. An additional 44% (n=355) reported that liability training was addressed "pre-service in the police academy." Chiefs also indicated that liability training was instituted as an interdepartmental matter (i.e., bulletin board, field training officer, monthly staff updates, roll call), through participation in specialized training schools, and by reading research publications, newsletters, and practitioner magazines.

Settling Lawsuits Before Trial

The practice of settling cases without trial has been criticized because it fails to address the underlying conditions that led to the lawsuit (Sontag and Barry 1997). To explore this issue, respondents were asked why lawsuits are settled. Sixty (n=483) percent of respondents indicated that settlements avoided "paying more later," 56% (n=454) said settlements "made the case go away," 38% (n=309) indicated that settlements avoided "losing the case in court," 37% (n=300) said settlements "avoided embarrassment," and 22% (n=180) believed that settlements compensated the "plaintiff even though no police wrongdoing occurred." Responding to an open-ended question on settlements, 147 (18%) respondents indicated that it was less expensive to settle lawsuits than to litigate them on their merits, even if no police wrongdoing occurred. Signifying a belief that lawsuits were a nuisance and not indicative of police misconduct, only 17% (n=136) of Texas police chiefs reported that settlements compensated the "plaintiff for police wrongdoing."

Disciplining Officers Involved in Lawsuits

News media reports indicate that officers within some police departments are rarely disciplined if they are a defendant in a civil suit that results in a monetary settlement or court verdict for plaintiffs (Sontag and Barry 1997). To explore this issue, respondents were asked if they disciplined officers involved in incidents "after a case was settled or lost in court." Only 10% (n=77) of police chiefs reported that officers were always disciplined. An additional 40% (n=323) of respondents indicated that officers were "sometimes disciplined," and 13% (n=101) said their officers were "never disciplined." These findings show that over one-half of Texas police chiefs "sometimes or never" disciplined their officers, even when money was awarded to plaintiffs. Future research should explore why chiefs apparently do not believe that discipline is warranted in such instances.

Preventing Police Lawsuits

The survey solicited data on the best way to prevent lawsuits. Police chiefs were asked how often they determined if their policies needed to be altered or amended to reduce civil litigation. Most (n=455; 56%) respondents conducted annual reviews of policies,



followed by quarterly (n=103; 13%), bi-annual (n=97; 12%), monthly (n=54; 7%), and weekly (n=16; 2%) reviews of policies. Fifty-four (5%) respondents said they never reviewed their policies.

Respondents were further asked to rank-order strategies that best prevented lawsuits from 1 (least important) to 5 (most important). The methods were identified by only two to five words, without further definition or interpretation. The methods listed were: better screening of applicants, better supervision, better training, early identification of problem officers, and treat people fairly. Respondents indicated that the most important strategy for preventing lawsuits was treating people fairly (2.8); this was followed by better training (2.6). Better supervision ranked third (2.08), better screening of applicants (1.96) ranked fourth, and early identification of problem officers (1.48) ranked as the least important factor for reducing liability lawsuits against police. Other notable strategies listed by respondents to reduce lawsuits included following departmental policies, employing college educated officers, holding officers accountable for their actions, and going by the book.

As mentioned above, respondents reported that "treating people fairly" was the best way for police to prevent lawsuits. Research on attitudes toward the police (ATP) has documented that citizens have negative ATP when they believe they are receiving unfair or differential treatment from police (Huang and Vaughn 1996). Walker (1997) also reported that disgruntled citizens who perceive fair treatment are less likely to file a complaint of police misconduct, and citizens whose complaints are not taken seriously by police may be more likely to file a civil lawsuit.

Respondents reported that "better training" was the second most important strategy for preventing lawsuits. Research has shown that liability risks increase when a department's official policymaker fails to develop adequate training regimens (del Carmen and Kappeler 1991). Police training on use of force increased after *Tennessee v. Garner* (1985), and with the proliferation of less-than-lethal weapons in the 1990s, training to reduce liability risks continued to increase (Vaughn and Ramirez 1992). According to the United States Supreme Court, citizens can also sue police for constitutional violations caused by inadequate police training (*City of Canton v. Harris* 1989). As a result, police training increased dramatically after *Canton*,

making law enforcement professionals more accountable for their actions (Alpert and Smith 1991).

"Better supervision" ranked as the third most important strategy to prevent lawsuits. Previous research has linked administrative breakdown and managerial disorganization in criminal justice agencies to an increase in civil liability (del Carmen 1989; Vaughn 1996). Indeed, the Christopher Commission reported that a lack of supervision led the Los Angeles Police Department (LAPD) to engage in unconstitutional conduct (Independent Commission on the Los Angeles Police Department 1991). Likewise, the Mollen Commission posited that supervisors at the highest levels of internal affairs in the New York Police Department (NYPD) abdicated their managerial responsibilities, turning a blind eye to police excessive use of force, drug dealing, and corruption (City of New York 1994). In these high-profile cases, lack of supervision generated civil lawsuits.

"Better screening of applicants" was ranked by respondents as the fourth best method to reduce civil litigation. For the most part, law enforcement agencies have instituted scientific procedures for hiring qualified individuals and weeding out applicants who might pose a liability risk (Gaines, Kappeler, and Vaughn 1999). Despite that, negligent and improper hiring lawsuits remain a potential area of concern for police administrators. In *Board of the County Commissioners of Bryan County v. Brown* (1997), the United States Supreme Court ruled that Section 1983 liability may attach if the plaintiff's injury was the plainly obvious consequence of the agency's wrong hiring decision. Under state tort law, the *respondeat superior* doctrine may hold police policymakers and governmental entities liable for improperly hiring an individual who later harms a plaintiff within the scope of his/her employment as a law enforcement officer (Vaughn 1999).

In accordance with recommendations from previous researchers (Toch 1996) who have called for the early identification of problem officers, respondents indicated that an early warning system would help prevent lawsuits. Failure to keep records and track problem officers have gotten many police chiefs in trouble (*Vann v. City of New York* 1995). Liability becomes a concern when police chiefs fail to identify and discipline problem officers who have repeatedly violated citizens' constitutional rights. In *Carney v. White*



(1994), for example, an officer admitted that "during his 11 years as a police officer, 6 to 12 times per year he would offer traffic violators the option of voiding citations in exchange for sexual acts." Although the officer amassed 245 voided traffic tickets without a documented reason, police supervisors failed to monitor, supervise or prevent his unconstitutional behavior (Kappeler and Vaughn 1997:363-64). Another example originated from Los Angeles, where a small group of officers who were the most aggressive and who accumulated the most citizen complaints of excessive force were promoted into training positions within the LAPD. Thus, a miniscule cadre of problem officers had a disproportionate negative impact on the entire department by transmitting violent and aggressive tendencies to generations of new recruits, thereby institutionalizing excessive force and brutality (Independent Commission on the Los Angeles Police Department 1991).

Conclusion

The survey of Texas police chiefs' views on legal liabilities in law enforcement, the results of which are discussed above, is the first comprehensive statewide survey on an important, yet under-researched, issue on the topic of legal liabilities in policing. Overall, the survey provides data that reinforce traditional knowledge about civil liability lawsuits, yet it also yields results that question findings of previous research. A more detailed analysis of survey results is best left for another day and in another publication forum. For now, the results of the survey that may be of most benefit to police administrators are those pertaining to lawsuit prevention. According to the survey, the methods identified by the police chiefs as most effective for preventing lawsuits are: better screening of applicants, better supervision, better training, early identification of problem officers, and treating people fairly. These observations, coming from police professionals who should know whereof they speak, should be carefully considered by law enforcement executives and integrated into their day-to-day decision-making if they are to minimize exposure in civil liability cases. We thank the hundreds of police administrators who participated in this survey and hope that the results are of help to them as they strive to become even more effective public officials in this litigation-prone era.

References

- Alpert, Geoffrey P. and William C. Smith. 1991. "Beyond City Limits and into the Woods: A Brief Look at the Policy Impact of *City of Canton v. Harris and Wood v. Ostrander*." American Journal of Police 10(1):19-40.
- _____. 1994. "Developing Police Policy: An Evaluation of the Control Principle." American Journal of Police 13(2):1-20.
- City of New York Commission to Investigate Allegations of Police Corruption and the Anti-Corruption Procedures of the Police Department. [Mollen Commission] 1994. Commission Report. New York: City of New York Commission to Investigate Allegations of Police Corruption and the Anti-Corruption Procedures of the Police Department.
- del Carmen, Rolando V. 1989. "Civil Liabilities of Police Supervisors." American Journal of Police 8(1):107-35.
- _____. 1991. Civil Liabilities in American Policing: A Text for Law Enforcement Personnel. Englewood Cliffs, NJ: Brady.
- del Carmen, Rolando V. and Victor E. Kappeler. 1991. "Municipalities and Police Agencies as Defendants: Liability for Official Policy." American Journal of Police 10(1):1-17.
- Fyfe, James J. 1988. "Police Use of Deadly Force: Research and Reform." Justice Quarterly 5:165-205.
- Gaines, Larry K., Victor E. Kappeler, and Joseph B. Vaughn. 1999. Policing in America. 3rd ed. Cincinnati: Anderson.
- Huang, W.S. Wilson and Michael S. Vaughn. 1996. "Support and Confidence: Public Attitudes Toward the Police." Pp. 31-45 in Americans View Crime and Justice: A National Public Opinion Survey, edited by Timothy J. Flanagan and Dennis R. Longmire. Thousand Oaks, Calif.: Sage.



Independent Commission on the Los Angeles Police Department. [Christopher Commission] 1991. Report. Los Angeles: Independent Commission on the Los Angeles Police Department.

Kappeler, Victor E. 1997. Critical Issues in Police Civil Liability. 2nd. ed. Prospect Heights, IL: Waveland.

Kappeler, Victor E., Stephen F. Kappeler, and Rolando V. del Carmen. 1993. "A Content Analysis of Police Civil Liability Cases: Decisions of the Federal District Courts, 1978-1990." Journal of Criminal Justice 21:325-37.

Kappeler, Victor E. and Michael S. Vaughn. 1997. "Law Enforcement: When the Pursuit Becomes Criminal—Municipal Liability for Police Sexual Violence." Criminal Law Bulletin 33:352-76.

Scarborough, Kathryn E. and Craig Hemmens. 1999. "Section 1983 Suits against Law Enforcement in the Circuit Courts of Appeal." Thomas Jefferson Law Review 21:1-21.

Sontag, Deborah and Dan Barry. 1997. "Using Settlements to Measure Police Abuse." New York Times, September 17, p. A1.

Toch, Hans. 1996. "The Violence-Prone Police Officer." Pp. 94-112 in Police Violence: Understanding and Controlling Police Abuse of Force, edited by William A. Geller and Hans Toch. New Haven: Yale University Press.

Vaughn, Michael S. 1996. "Prison Civil Liability for Inmate-Against-Inmate Assault and Breakdown/Disorganization Theory." Journal of Criminal Justice 24:139-52.

_____. 1999. "Police Sexual Violence: Civil Liability Under State Tort Law." Crime and Delinquency 45:334-57.

Vaughn, Michael S. and Christine R. Ramirez. 1992. "Police Civil Liability for Use of Stun and Taser Guns." Police Liability Review 4(Winter):1-3.

Walker, Samuel. 1997. "Complaints against the Police: A Focus Group Study of Citizen Perceptions, Goals, and Expectations." Criminal Justice Review 22:207-26.

Cases Cited

Board of the County Commissioners of Bryan County v. Brown 117 S.Ct. 1382 (1997).

Carney v. White 843 F.Supp. 462 (E.D. Wis. 1994).

City of Boston v. Boston Police Patrolmen's Association 717 N.E.2d 667 (Mass. App. 1999).

City of Canton v. Harris 489 U.S. 378 (1989).

Tennessee v. Garner 471 U.S. 1 (1985).

Vann v. City of New York 72 F.3d 1040 (2nd Cir. 1995).

Notes

¹Due to rounding, percentages may not add to 100.

²208 (33%) cases were pending.

³There were fewer causes of action than cases litigated because some lawsuits contained no causes of action and were dismissed.

⁴45 (35%) cases were pending.

⁵There were more causes of action than cases litigated because some lawsuits contained multiple causes of action within one lawsuit.

⁶Although respondents indicated they "lost" 94 lawsuits in cases against members of the public, they claimed that plaintiffs received a monetary award in 193 cases. Such an apparent contradiction can be explained by the fact that some respondents may not believe that they "lost" when a case was settled. Settlement agreements frequently stipulate no admission of wrongdoing, and neither side officially can claim victory.

⁷Even though respondents indicated they "lost" 34 lawsuits filed by their own officers, they claimed that plaintiffs received a monetary award in 78 cases. Such an apparent contradiction can be explained by the fact that some respondents may not believe that they "lost" when a case was settled. Settlement agreements frequently stipulate no admission of wrongdoing, and neither side can officially claim victory.



BILL BLACKWOOD

Law
Enforcement
Management
Institute of
Texas

Randy Garner, Ph.D.
Executive Director

Kay Billingsley
Publications Manager

For information about LEMIT
programs, call (800) 477-9248

TELEMASP Monthly Bulletins,
ISSN 1075-3702, are produced
under an agreement with the

Police Research Center

Sam Houston State University
Larry T. Hoover, Ph.D., Director
Jamie L. Tillerson, Program Manager

For information about TELEMASP
Bulletins, call (936) 294-1704

This Bulletin was authored by Michael S. Vaughn, Tab W. Cooper, and Rolando V. del Carmen. Dr. Vaughn is an Associate Professor in the Department of Criminal Justice at Georgia State University. Dr. del Carmen is a Distinguished Professor of law and criminal justice in the College of Criminal Justice at Sam Houston State University. Mr. Cooper is a Project Coordinator in the Bill Blackwood Law Enforcement Management Institute of Texas.



A Member of The Texas State University System

**Bill Blackwood Law Enforcement
Management Institute of Texas**

Criminal Justice Center
Sam Houston State University
Huntsville, TX 77341-2296

Non-Profit
Organization
U.S. POSTAGE
PAID
Permit No. 26
Huntsville
Texas