

USC Department of Public Safety

How a Multi-Million Dollar University Police Force Negatively Impacts Campus Life and Endangers the Surrounding Community

Overview

1. An overview of the University of Southern California Department of Public Safety (USC-DPS).
2. Examples of past incidents involving USC-DPS/Police officers with students and community members.
3. USC-DPS hires former LAPD officers with history of allegations of excessive force, racial discrimination, and officer-involved shootings.

Context: University of Southern California Department of Public Safety

USC's Department of Public Safety is one of the largest campus police departments in the nation.ⁱ Since 2002, USC spent \$557 million to fund its police department (See figure 1).ⁱⁱ The money has been spent on installation of cameras, license readers, street lighting, private security officers, outreach projects, and other security measures.ⁱⁱⁱ These excessive security measures enable the profiling of low-income and minority community members around USC.

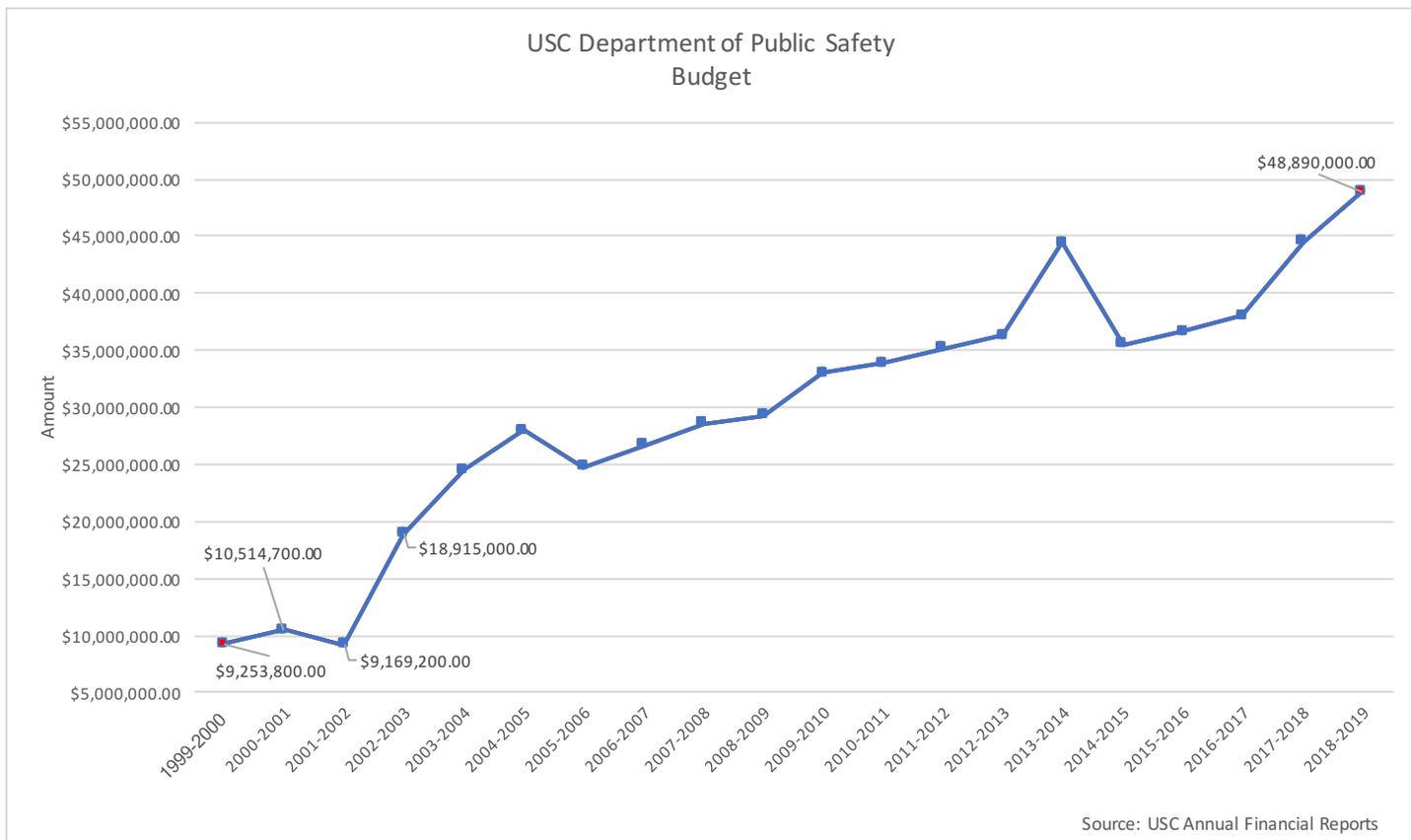


Figure 1

In this report, USC Police is used interchangeably with USC DPS. The USC Police Department operates 24 hours a day and 365 days a year. It currently employs more than 300 full-time employees of which over 110 full-time employees are police officers.^{ivvi} The USC Police Department full-time employee personnel increased from 1995 to 2016, by more than 70% (see figure 2). Intensifying USC Police presence on and off campus.

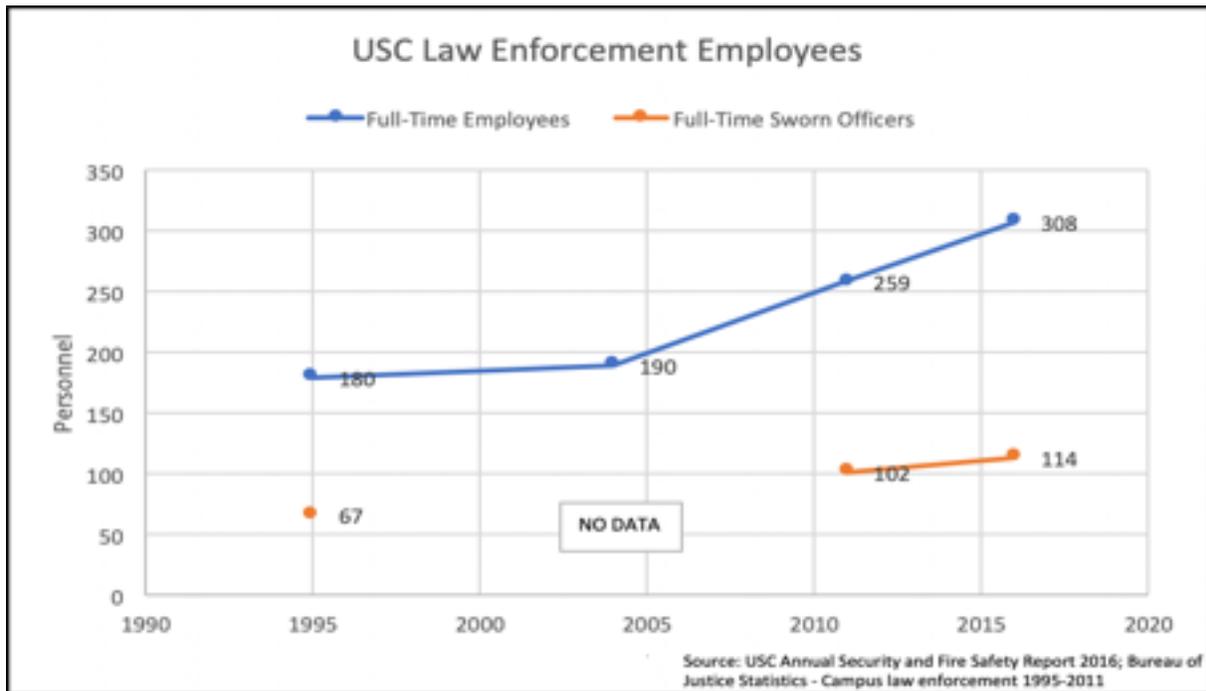


Figure 2

The intensive patrolling by USC Police Officers – on and off campus is possible through a Memorandum of Understanding (MOU) with the Los Angeles Police Department signed on October 20, 2009.^{vii} On April 21, 2014, the MOU was amended to modify aspects of reporting release from custody (RFC) arrest reports. The current MOU grants armed USC Police Officers the power to write parking, bike, and pedestrian citations and make arrests within 2.5-mile radius when they have probable cause.

Although USC’s Police Department has the same level of arrest powers as LAPD, they do not have to comply with legislation that applies to LAPD. For example, California’s Racial and Identity Profiling Act (RIPA) of 2015 is a measure aimed at eliminating racial profiling and identity profiling by law enforcement by making large police departments release data on all stops made. Unlike LAPD, USC Police Department won’t have to be in compliance with RIPA until 2023.^{viii}

Past Incidents Involving USC Police Officers

As the example below demonstrates, the USC Police Department in and around the campus has had negative impacts on community members and students particularly black and brown. The following are a few examples that highlight the negative experience of community members and students with the USC Police:

1. In May 2013, LAPD in collaboration^{ix} with USC Police, targeted an end-of-the-year party attended predominantly by black and brown students, and it was shut down by almost 100 LAPD officers^x, some in full riot gear. After the incident, USC Police Captain David Carlisle provided a statement indicating that USC’s Police Officers were not involved in the response but pictures of the incident clearly show USC’s Police Officers at the scene.^{xi} The incident happened near another large and loud party attended predominantly by white students, their party was not shut down by the police.^{xii} Students arrested that night filed a lawsuit and received \$450,000 in a settlement.^{xiii}

2. In December 2015, USC Police Officer, Miguel Guerra, killed a USC graduate student in a car crash.^{xiv} The officer was on route to respond to a call pertaining to a stranger in a USC parking lot. The officer was driving at a speed of 70 miles per hour (mph) without emergency sirens and tragically T-Boned the graduate student's car near campus. The victim's family members sued USC for allowing Officer Guerra to work consecutive graveyard shifts and being short on sleep when the crash occurred.^{xv} On July 5, 2016, the Los Angeles City Attorney's office filed a misdemeanor vehicle manslaughter charge against Officer Guerra. On December 7, 2016, Officer Guerra plead no contest to manslaughter and was sentenced to 30 days in jail and 45 days of community labor, as well as three (3) years of probation.^{xvi} USC continues to employ Officer Guerra.^{xvii}
3. In September 2019, USC Police Officers used excessive force to arrest Liliana Cortez for hugging a tree on a sorority lawn. According to Ms. Cortez, she was tackled to the ground by the officers and sustained many bruises on her arms, shoulders, back, ribs, knees, calves, and wrists.^{xviii} A witness noted that "Ms. Cortez was suddenly on the ground with a knee full force in her back, writhing in pain and struggling to breathe."^{xix}

Allegations on Twitter



Former LAPD Officers Working for USC's Police Department

USC's Police Department has been willing to hire LAPD officers whose past includes documented misconduct allegations and officer-involved shootings.

Methodology:

A process of cross-reference was conducted to identify any USC Police Officers who previously worked for LAPD and had a history of police misconduct allegations or officer-involved shootings. The first step was to search the USC staff directory.^{xx} The staff directory was downloaded into an excel sheet and sorted by departments. The excel sheet was narrowed to only the Department of "Public Safety." Among those employees in the Department of Public Safety, the primary focus was identifying officers. The excel sheet was further narrowed and officers with unique names were given higher priority in the second step. The second step was to run Google and Lexis Nexis searches with words like – "Shooting", "LAPD", "Police Department", "Lawsuit", "Allegations", and "Pension." The third step was to search social media to confirm their identity and retrieve professional photos on the job.

Misconduct Allegation Findings:

Four (4) former LAPD officers have been identified whose past include documented misconduct allegations and who hold leadership positions at USC like lieutenant or sergeant (see below). Although the officers are no longer with LAPD, most continue to collect their hefty pension check from taxpayers while at USC (*see appendix*).

Peter "Pete" Foster ^{xxi}, Current USC Lieutenant

Where: Los Angeles Police Department (LAPD)

When: 2013

What: Fired by LAPD after claims of racial harassment

Facts: On March 26, 2013, a jury ordered the City of Los Angeles to pay \$1.2 million^{xxii} to a black police officer who alleged he was the butt of vulgar racial harassment by a white supervisor and other officers. In his lawsuit, Officer Earl Wright, accused the supervisor, Sergeant Peter Foster, and a handful of other officers of carrying out racial pranks and making comments that left him "embarrassed and humiliated."



Example #1: Officer Wright asked Sergeant Foster for permission to leave work early and Sergeant Foster, who is white, allegedly responded, "Why, you gotta go pick watermelons?"^{xxiii}

Example #2: Sergeant Foster summoned Officer Wright and his partner back into the station from the field to celebrate Officer Wright's 20th year of service as an LAPD officer. With officers laughing and applauding, Sergeant Foster then presented Officer Wright with a cake that was topped with a piece of fried chicken and a slice of watermelon, according to Officer Wright's lawsuit.^{xxiv}

The jurors noted that LAPD's procedures for handling harassment claims such as Officer Wright's were ineffective. Officer Wright's verdict was the second seven-figure payout for the city in early 2013.^{xxv}

Following an internal investigation into Officer Wright's claims, an unnamed supervisor – "presumably" Sergeant Foster according to the L.A. Times – was sent to a disciplinary hearing, after which he was fired.^{xxvi} Within weeks, he was hired by USC (See below).



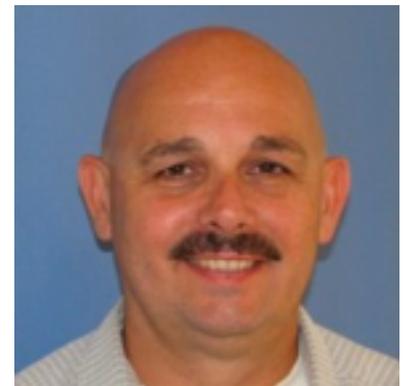
Frank Trevino^{xxvii}, Current USC Sergeant

Where: Los Angeles Police Department (LAPD)

When: 2002

What: Fired by LAPD for making false statements

Facts: Officer Frank Trevino was targeted for an integrity audit, commonly referred to as a sting operation, by Internal Affairs (IA) as a result of a complaint from a suspect that Officer Trevino had taken \$100 from him during booking.^{xxviii}



On September 10, 2002, Officer Trevino was on duty and working at the LAPD Newton Division when Sergeant Tonya Dummar went to the Communications Division (the dispatch center) to assign a call to Officer Trevino as part of the sting operation.

Beverly Enriquez, a civilian employee at the dispatch center, happened to be friends with Officer Trevino's wife. Officer Trevino's wife was a Downey Police Officer and a former civilian in the LAPD Communications Divisions. Ms. Enriquez left a message on both Mr. and Ms. Trevino cell phone voice mail and on the answering machine of Officer Trevino's wife, warning that IA would be monitoring frequencies and testing officers with bogus calls. Officer Trevino's wife then also called Officer Trevino and left a message on his voice mail. Soon thereafter, Trevino called Enriquez and thanked her for the warning.

Later that afternoon, as a part of the sting operation, Sergeant Dummar gave the police dispatcher a bogus call and told her to assign it to Officer Trevino. However, the sting had failed and Sergeant Dummar called it off. No further sting efforts ensued because Officer Trevino went to work with detectives and was no longer in the field.

On October 11, 2002, Officer Trevino called Sergeant Maria Acosta to find out the status of his pending promotion to Sergeant. While chatting during the call, Officer Trevino mentioned to her that there had been a sting on him but that a friend in the Communication Division had warned him of the attempt. Sergeant Acosta did not ask the name of Trevino's friend, but considered the situation he revealed to be very bad.

On October 25, 2002, IA assigned the investigation to Sergeant Orlando Moreno. On September 4, 2003, as part of a criminal investigation, Sergeant Moreno interrogated Officer Trevino. During this September 4, 2003, interview Trevino claimed that he did not know the name of any of his wife's friends in the Communication

Division. On February 26, 2004, Sergeant Moreno again interrogated Officer Trevino as a part of the investigation. Sergeant Moreno played for Officer Trevino the recording of his prior interview on September 4, 2003, and Officer Trevino was offered but declined the opportunity to change any of his prior statements. Sergeant Moreno then asked Officer Trevino again if he knew the identity of the Communication Division employee who had tipped of his wife about the sting operation. Officer Trevino again claimed he did not know the identity of that person. Sergeant Moreno played for Officer Trevino the tape recording of the September 10, 2002, telephone call from Officer Trevino to Ms. Enriquez. Officer Trevino acknowledged that the recording was of a conversation between him and Ms. Enriquez, but asserted he could not remember what he was thanking Ms. Enriquez for.

In April of 2004, Officer Trevino received notice of the results of Sergeant Moreno investigation and the complaints containing the allegations. On July 8, 2004, after considering Officer Trevino's responses to a notice of proposed disciplinary action, the Chief of Police relieved Trevino of duty without pay and demoted him from sergeant to police officer III, pending a hearing by a Board of Rights.

On October 14, 2004, Sergeant Moreno attempted to contact Officer Trevino through his legal representative to set-up a further interview. On October 25, 2004, Sergeant Moreno also sent by certified mail a letter to two known addresses for Officer Trevino, ordering him to appear with a representative for an interview as a part of the ongoing investigation and warning him that he would face an additional charge if he did not appear. Officer Trevino did not appear.

On November 8, 2004, Sergeant Moreno confronted Officer Trevino and ordered him to submit to an interview. When Sergeant Moreno told Officer Trevino that he had been trying to reach him for some time, Officer Trevino asserted he had no prior knowledge of Sergeant Moreno's letter. During additional interviews on November 15 and 23, 2004, Officer Trevino again denied knowing that Sergeant Moreno had earlier sent him a certified letter.

On December 2, 2004, an amended complaint was filed against Officer Trevino. It contained five (5) counts of misconduct.

1. On September 4, 2003, Trevino while on duty made false statements to Moreno
2. On February 26, 2004, Trevino while on duty made false statement to Moreno
3. On September 10, 2002, Trevino became aware of misconduct committed by civilian employee Ms. Enriquez and failed to notify an LAPD supervisor.
4. Between February 2004 & August 26, 2004, Trevino was insubordinate when he violated a direct order not to discuss his personnel complaint investigation with any person
5. Between November 15, 2004, & November 23, 2004, Trevino while on duty made false statement to Moreno.

After a hearing, the Board of Rights found Officer Trevino guilty of all five counts. It reviewed Officers Trevino personnel records, which revealed a five-day suspension in 1995 for making a false statement, and recommended his removal from employment. In recommending Officer Trevino's discharge, the Board of Right found that he had lost sight of his oath of office and acted in a self-serving and arrogant manner.

Officer Trevino then filed a petition for a writ of mandate in the superior court seeking to set aside his termination on various grounds. The court declined to set aside his termination. However, the court struck count 3 in the personnel complaint on statute of limitations grounds and directed that the Board of Rights reconvene for the purpose of considering an appropriate penalty for the remaining counts of which Trevino had been found guilty. After an appeal of this decision, the Court of Appeal found insufficient evidence for count 5 because Trevino was not on duty at the time he made the false statement. Otherwise, the court affirmed the trial court's decision.

After being fired by LAPD, Frank Trevino was hired by USC.

Steven Alegre^{xxxix}, Current USC Sergeant

Where: Santa Ana Police Department

When: 1984

What: Allegations of Excessive Force

Facts: Officer Steven Alegre has been directly involved in three (3) officer-involved shooting (OIS) when he was with the Santa Ana Police Department.^{xxx}

On July 7, 1984 two officers (Steve Alegre and John Follo) approached Ezequiel Flores Larios, 25, who was sitting in a parked car, to question him about “possible narcotics activity.” Larios sped away and later left the car to flee on foot. The officers chased him. When Mr. Larios “resisted arrest”, the officers struck him several times on the head with night sticks.^{xxxi} According to two witnesses who said they saw the arrest, the officers struck Mr. Larios both before and after they handcuffed him even though Mr. Larios pleaded with them to stop, saying he had had enough.

According to a lawsuit filed by the family, neither City Police nor Orange County Jail employees sent Mr. Larios for medical attention – until he collapsed in jail and died.

Although Alegre was not criminally charged, the lawsuit filed by Mr. Larios’ family alleged that “excessive and unreasonable force” and failure to render medical aid caused his death. The suit accused officers Steven Alegre and John Follo, of acting “in such an unreasonable and dangerous manner” that serious injury and death could be foreseen. The lawsuit was for \$5 million but the city of Santa Ana denied the claim in November 1984.^{xxxii}

Rodney Peacock^{xxxiii}, Current USC Sergeant

Where: Los Angeles Police Department (LAPD)

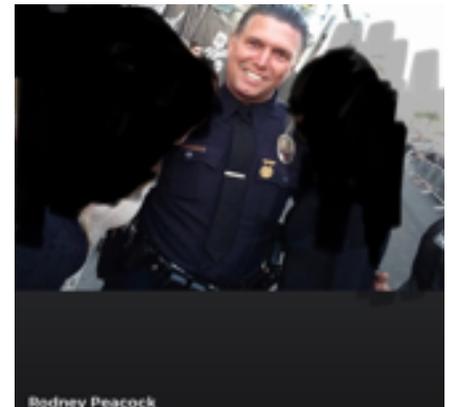
When: 2000 & 2009

What: Tainted credibility as police officer and failure to diligently investigate a fellow police officer

Facts:

Incident #1: The LAPD Rampart corruption scandal, in the late 1990s, sparked a bitter legal debate that promised to alter the landscape of criminal justice in LA County. At issue was the credibility of the police officers who investigate, arrest and testify against people. On October 6, 2000, the LA Times published an article that uncovered numerous instances in which police and prosecutors failed to provide defense attorneys with relevant information about officers.^{xxxiv} The article mentioned Officer Rodney Peacock, “who tried to coerce information from a suspect by dropping a pebble in the man’s shirt pocket and implying that he was going to frame him on a crack cocaine possession charge if he did not cooperate.”^{xxxv} This example is one of many of officers found guilty of offenses that bear on their credibility.^{xxxvi}

Incident #2: On November 9, 2009, Officer Jason Pedro, a police officer with the City of Los Angeles, drove a female friend, a minor, to a medical clinic in an unmarked police car while he was on duty and in uniform.^{xxxvii} Francis O’Brien, a concerned citizen, attempted to give Officer Pedro anti-abortion literature, but Officer Pedro declined without speaking to O’Brien. O’Brien complained to the police department. Sergeant Rodney Peacock was directed to investigate the matter, and drove to the clinic. Sergeant Peacock asked Officer Pedro what he was doing [at the clinic], and Officer Pedro said he had dropped someone off at the clinic. Officer Pedro asked what Sergeant Peacock was doing [at the clinic], and Sergeant Peacock said he was “visiting a nearby store.”



On November 30, 2009, Officer Pedro drove the same minor to the same medical clinic in an unmarked police car while he was on duty and in uniform. O'Brien again offered anti-abortion literature. O'Brien sent a letter to the Chief of Police, stating that an officer was conducting personal business while on duty.

On December 20, 2010, Officer Pedro received an administrative complaint charging him with four (4) counts of misconduct.

1. Using a city vehicle inappropriately to transport a member of the public in order to conduct personal business while on duty on November 9, 2009.
2. Using a city vehicle inappropriately to transport a member of the public in order to conduct personal business while on duty on November 30, 2009.
3. Making a discourteous statement to O'Brien while on duty on November 30, 2009
4. Making a misleading statement while on duty to a police department supervisor conducting an official investigation on November 9, 2009

On April 29, 2011, a hearing took place in front of the Board of Rights. Officer Pedro pled guilty "to count one and two" and pled not guilty to count three and four. Officer Pedro moved to dismiss all charges based on the one-year statute of limitation found in Government Code section 3304, part of the Public Safety Officers Procedural Bill of Right Act (POBRA). The board found officer guilty on all four counts, and recommended a 22-day suspension. Officer Pedro filed a petition for writ of administrative mandamus against the City.^{xxxviii} He alleged that counts one, two, and three were all barred by the statute of limitations, and that his POBRA rights were violated when Sergeant Peacock questioned Officer Pedro on November 9, 2009 without informing him that he was being investigated for misconduct.

The appellate court agreed that the statute of limitations period for count four began to run on November 9, 2009 because Sergeant Peacock was obligated to investigate O'Brien's allegations with reasonable diligence and failed to do so. Sergeant Peacock should have discovered that Officer Pedro's November 9, 2009 statement that he was dropping off a victim was false. Sergeant Peacock could have inquired at the clinic, or could have asked his watch commander whether the clinic was a facility where the police took crime victims for treatment, to which the answer would have been "no." Sergeant Peacock could have asked Officer Pedro and others further questions to ascertain whether Officer Pedro was conducting official business.

Following these incidents, Rodney Peacock was hired by USC.

Officer-Involved Shooting Finding

One (1) additional former LAPD officer has been identified whose past includes a documented officer-involved shooting and who holds a leadership position at USC as an assistant chief.

Alma Burke-Andrade^{xxxix}, Current USC DPS Assistant Chief

Where: Los Angeles Police Department (LAPD)

When: 2003, 2010, and 2014

What: Officer-involved shooting (OIS) and investigation of Ezell Ford death

Facts:



Incident #1: On July 27, 2003, Yousuf Mollah, 32, a Bangladeshi native was fatally shot by Officer Alma Andrade.^{xi} Officer Andrade and her partner were responding to a report of Mr. Mollah exposing himself to children. When officers arrived to Mr. Mollah's apartment at 6:30pm – Mr. Mollah "opened the [door] and stepped into the hallway holding a 13-inch kitchen knife." Officer Andrade drew her service weapon and ordered Mr. Mollah to drop the knife. Mr. Mollah didn't and instead lunged at her. Officer Andrade shot Mollah once in the abdomen. Mr. Mollah fell to the floor but managed to crawl back inside his apartment. The police waited 3 hours to call a SWAT team. On or about 9:30pm, LAPD Officers fired tear gas into the apartment, broke the door, and found Mr. Mollah dead.^{xii} According to Mr. Mollah's family, he had serious mental health problems.

Incident #2: On June 17, 2010, at around 9pm, after the conclusion of the 2010 NBA Championship Game in Downtown Los Angeles, LAPD Officer Alma Burke, a supervising officer at the scene, fired a warning shot into the air to "disperse a hostile group of people whose activities were rapidly escalating into acts of violence."^{xiii}

Incident #3: On August 11, 2014, in South Los Angeles, LAPD Newton Area Gang Enforcement Detail (GED) Officers Charlton Wampler and Antonio Villegas initiated a "consensual encounter" with Ezell Ford. An altercation ensued and as a result, Wampler and Villegas used deadly force upon Ezell Ford. LAPD Officer Alma Burke was assigned to head the investigation. Officer Burke's investigation concluded that "Officer Charlton Wampler and Antonio Villegas acted lawfully in self-defense and in defense of others when they used deadly force against Ezell Ford."^{xiii} LAPD Chief Charlie Beck reviewed and analyzed Burke's investigative report and concluded that the officers involved in the shooting were justified in opening fire.^{xiv} But on June 9, 2015, the Los Angeles Police Commission (LAPC) rejected Beck's findings, ruling that Officer Wampler use of deadly force violated LAPD policy.^{xv}

Following these incidents, Alma Burke-Andrade was hired by USC.

Appendix: Retirement Pensions Paid for by the City of Los Angeles

The two (2) tables show current USC Police Officers who previously worked for LAPD or another police department and the total pension amount for fiscal year 2019. Some of officers listed below enrolled in the Deferred Retirement Option Plan (DROP) program^{xlvi}, which pays law enforcement their pensions, as well as their salaries for the last five (5) years of their careers. The program allows police officers to nearly double their pay.

#	Name	Position at USC	LAPD Ties	Pension Amount in 2019 ^{xlvii}	Member of DROP	One-Time DROP Payout
1	Peter Foster ^{xlviii}	Lieutenant	Yes	\$50,777.94	No	
2	Steve Alegre	Sergeant	Yes	\$94,397.40	No	
3	Rodney Peacock	Sergeant	Yes	\$68,416.68	Yes	\$262,702.00
4	Edgar "Ed" Palmer	Captain	Yes	\$98,778.48	Yes	\$321,439.56
5	Alma Burke	Assistant Chief	Yes	N/A	No	
6	Frank Trevino ^{xlix}	Sergeant	Yes	\$23,520.00	No	

Additional USC Police Officers:

#	Name	Position at USC	LAPD Ties	Pension Amount in 2019 ⁴⁹	Member of DROP	One-Time DROP Payout
1	John Thomas	Chief	Yes	\$67,953.84	No	
2	David Carlisle	Assistant Chief	Whittier PD	\$98,384.88	N/A	
3	William "Bill" Webster	Captain	Whittier PD	\$126,966.72	N/A	
4	Daniel Ellerson	Lieutenant	Yes	\$63,330.38	Yes	\$164,147.00
5	Mark Cervenak	Lieutenant	Yes		No	
6	Kevin Webb	Sergeant	Yes	\$129,596.20	Yes	\$605,147.26
7	Robert Rivera	Detective	Yes	\$97,718.35	Yes	\$7,911
8	Osmund C. Bouligny	Police Officer	Yes	\$42,081.06	No	
9	Eugene Coleman	Police Officer	Yes	\$105,546.98	Yes	\$464,773.84
10	Jerry Moya	Police Officer	Yes	\$111,030.52	Yes	

Endnotes

- i https://dps.usc.edu/files/2019/10/ASR_Version_9_30_19_PM_5R2.pdf
- ii <https://comptroller.usc.edu/annual-financial-reports/>
- iii <https://dailytrojan.com/2012/04/26/lapd-dps-officers-to-be-added-to-usc-area/>
- iv <https://dps.usc.edu/contact/join-dps/>
- vv <https://dps.usc.edu/files/2016/10/ASR-2016-Final-9-30-2016.pdf>
- vi <https://www.bjs.gov/index.cfm?ty=tp&tid=76>
- vii <https://ia600902.us.archive.org/11/items/LAPDMemorandumsOfUnderstandingWithUSC/LAPD%20memorandums%20of%20understanding%20with%20USC.pdf>
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- ix <https://dailytrojan.com/2013/05/04/lapd-response-angers-students-raises-questions/>
- x <https://www.npr.org/sections/codeswitch/2013/05/09/182175917/L-A-s-Police-Department-Faces-Allegations-Of-Racism>
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- xiv <https://www.latimes.com/local/lanow/la-me-ln-usc-student-killed-lawsuit-20160921-snap-story.html>
- xv *ibid.*, 14
- xvi <http://www.uscannenbergmedia.com/2016/12/07/usc-dps-officer-pleads-no-contest-to-manslaughter-in-2015-student-death/>
- xvii USC's current staff directory list Miguel Guerra as a public safety officer - <https://uscdirectory.usc.edu/web/directory/faculty-staff/>
- xviii <https://la.streetsblog.org/2019/12/06/uscs-public-safety-officers-tackle-traumatize-woman-for-hugging-tree-on-sororitys-lawn/>
- xix *ibid.*, 18
- xx <https://uscdirectory.usc.edu/web/directory/faculty-staff/>
- xxi Picture was verified using this video: <https://twitter.com/AnnenbergMedia/status/970841933504397312> ; <http://aliveemployeesclub.com/wp-content/uploads/ARCHIVE/2009/200905-Alive-LAPD-Central-city-honors-officers-and-personnel.pdf>
- xxii <https://www.latimes.com/local/lanow/la-xpm-2013-mar-26-la-me-ln-lapd-verdict-20130326-story.html>
- xxiii *ibid.*, 22
- xxiv *ibid.*, 22
- xxv *ibid.*, 22
- xxvi *ibid.*, 22
- xxvii <https://www.linkedin.com/in/frank-trevino-cfe-4785b340>
- xxviii <https://www.fearnottlaw.com/wsnkb/articles/trevino-v-city-of-los-angeles-23596.html>
- xxix Picture was verified using USC's annual report on crime: <https://dps.usc.edu/files/2016/10/ASR-2016-Final-9-30-2016.pdf> (see pg. 4), <http://gwcnews.com/news/campus-safety-symposium-held-at-golden-west-college/> , & video: <https://www.youtube.com/watch?v=Qmyaeca45k8>
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Endnotes

- xxxiv <https://www.latimes.com/archives/la-xpm-2000-oct-06-mn-32481-story.html>
- xxxv *ibid.*, 33
- xxxvi *ibid.*, 33
- xxxvii <https://www.lcwlegal.com/news/misconduct-charges-against-police-officer-were-barred-by-statute-of-limitations-2>
- xxxviii <https://trellis.law/case/BS133554/JASON-PEDRO-VS-CITY-OF-LOS-ANGELES-ET-AL>
- xxxix Picture was verified using: <https://news.usc.edu/61092/usc-scholarship-supports-lapd-community-leaders/>
- xl https://lapdonline.org/july_2003/news_view/21186
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- xliv <https://www.lafpp.com/sites/main/files/file-attachments/minutes-2015-08-06.pdf> (*See pg. 7*)
- l *ibid.*, 49.