Dear Central Family,

This morning I met with the CCSU Police Department to share two reports from Bernie Sullivan, assistant to the President for Safety. You may recall that I appointed him in June to temporarily take over management of the department after an independent investigation brought to light a series of troubling behavioral, procedural, and staffing issues in the department.

Mr. Sullivan was asked to identify and correct Police Department policies, procedures, and training and to evaluate staffing levels and the department's budget. His reports are available here. (Attached)

In the first report, Mr. Sullivan reviewed the alleged sexual assault of a female CCSU police officer by Officer Curtis Lollar. Based upon that review, Mr. Sullivan recommended that the administration “make every effort to keep Officer Lollar from returning to the department due to the nature of his behavior as determined by the investigation conducted by Shipman & Goodwin LLC.” Officer Lollar’s employment at CCSU was terminated on Sept. 21, 2018.

Mr. Sullivan’s comprehensive review of the CCSU Police Department corroborates the independent investigator’s findings that a culture of unprofessional and disrespectful behavior existed within the department, discipline was lacking, and that there were deficiencies in staffing, hiring, and budget. Under Mr. Sullivan’s leadership, and with my approval, a number of changes have been or are in the process of being implemented. They include the following:

**Training**
- Since July 2018, all Police Department supervisors attended a two-hour, in-person sexual harassment prevention training.
- In September, several police officers attended a training about strategies for working with sexual violence victims.
- The entire department will undergo sexual harassment and Title IX training while the University is on winter break.
- Supervisors will undergo training in areas such as evaluating staff and using progressive discipline and positive reinforcement with subordinates to enhance performance.

**Policies & Procedures**
- A new disciplinary policy is in place requiring police supervisors to review employee personnel files prior to issuing any counseling or discipline. This will ensure they are aware of any prior offenses and any discipline is reflected in evaluations. The police chief is required to conduct an annual inspection to ensure these procedures are compliant.
- A new background investigation sign-off has been implemented requiring multiple layers of review. It provides solid documentation as to the candidate’s position and prevents any single individual from having the final approval for hiring.
- Pre-background questionnaires will require candidate signatures to be notarized and affirmed as truthful. This will make it easier to decertify officers if, later, facts reveal the candidate was untruthful.
Staffing & Budget

- The Police Department will now report directly to me.
- The Police Department budget has been separated from the Administrative Services budget and is receiving $282,000 annually in additional funding.
- A new police sergeant will be hired.
- Two vacant police officer positions are being reclassified to positions of sergeants.
- Two vehicles will be purchased for the two new sergeants.
- The student cadet program is hiring five or more additional students.
- Three police recruits were hired in July, have been undergoing training at the Police Academy in Meriden, and will begin full-time duty in January 2019.
- A full-time, seasoned administrative assistant was reassigned to work with the department.
- A clerk typist position has been converted to an administrative assistant position.

In Mr. Sullivan’s view, the department’s slip in performance during the past several years was “caused by a lack of proper oversight by the previous administration.”

“With proper supervision, there is no reason to believe the department and its individual officers cannot provide appropriate police services to the campus community,” Sullivan noted.

I realize the reputation of the CCSU Police Department has been tarnished by our investigations. The poor choices and actions of a few do not represent the good work and dedication of the entire department. I am pleased at the progress that has been made in addressing deficiencies and that the culture within the department is improving. I am confident this will continue as our police force works to regain its stature as a professional, caring partner in making the CCSU campus a safe and welcoming environment for all.

Finally, I am greatly appreciative of Mr. Sullivan’s oversight and guidance during the last six months. His experience and insights as a seasoned law enforcement expert have been invaluable. Thank you Bernie!

Sincerely,

Zulma R. Toro
President
TO: Zulma R. Toro, President
FROM: Bernie Sullivan, Assistant Vice President for Safety
DATE: October 18, 2018
RE: Review of Police Department 2016 Sexual Assault Allegation

In response to your charge that I identify and correct defective procedures, policies, and training involving the CCSU Police Department and determine what means are necessary to restore professionalism to the department, I submit this report. This, the first of two, is a review of the handling of sexual assault claims involving two CCSU police officers.

At the outset, I would note that during my time with the Hartford Police Department, one of my assignments was Commanding Officer of the Major Crimes Division where I was responsible for managing the investigations of murders, robberies, rapes, and allegations of kidnapping, and serious assault.

During that time, I oversaw the investigation of more than 200 rape complaints. Some of these cases involved coworkers and some involved delayed reporting. I know that a traumatized victim will, at times, be unable to report an incident expeditiously.

Prior to reaching any opinions, I reviewed various documents, including, but not limited to, the background investigations and personnel files of those involved.

On or about November 17, 2016, Officer [redacted] was called in by Lt. Ed Dercole for counseling regarding her handling of a hit and run investigation. It was during that meeting that she told him she wished to speak to him as a friend and informed him that she had been sexually assaulted by another member of the Police Department. She did not name the individual, nor did she describe the degree of assault or the location where the assault occurred. She told Lt. Dercole she did not wish to make a complaint. She also did not want Lt. Dercole to notify Chief Sneed because, she said, she had moved on. Lt. Dercole informed her that he was obligated to tell Chief Sneed. He then advised Officer [redacted] of available services should she wish to seek assistance. She responded by confirming that she knew of such services (Verified by Lt. Dercole in a phone call with me and, also, in a memo he wrote to Chief Sneed on November 17, 2016 -- see attached).

At the time, Chief Sneed was on vacation, so Lt. Dercole notified him of [redacted] allegation upon Sneed’s return on December 5, 2016. The following day (December 6, 2016) Lt. Dercole called Officer [redacted] to his office and advised her that he had notified Chief Sneed. She again stated she did not want to make a complaint and that her pastor, psychiatrist, and mentor had helped her move on.

In a memo I directed him to submit to me (see attached), Chief Sneed stated that he, his supervisor, Chief Administrative Officer Richard Bachoo, and Chief Human Resources Officer,
Anna Suski-Lenczewski, discussed the incident. They agreed that, absent any pertinent information and the victim’s unwillingness to make a complaint, there was not much they could do (Suski-Lenczewski verified this to me in an email after I requested any notes she might have related to this conversation - see attached).

Though Suski-Lenczewski could not recall if the conference occurred in person or on the phone, her recollection was that they did not know where or when the alleged incident occurred. Suski-Lenczewski stated that she asked Chief Sneed if there was a basis for a criminal investigation and that, he stated, there was no action that he could proceed with. Suski-Lenczewski also recalls the three of them discussed the possibility of launching an internal investigation but given that ___ did not provide a time frame nor her assailant’s name, they did not believe there was anything they could investigate.

The consultation between Bachoo, Sneed, and Suski-Lenczewski is new information. According to Attorney Mehta, during her investigation and conversations with Bachoo, Sneed, and Suski-Lenczewski, none of the three ever mentioned this conversation occurred, nor did any of them offer correspondence confirming their conferencing on this matter.

I point out that at the time of their consultation, they had possession of Lt. Deroole’s memo which, as the Shipman & Goodwin report indicates, clearly stated that the incident involved another member of the police department.

Their decision not to pursue an internal investigation was contrary to the mandatory reporting principles of Title IX and a violation of the University’s own policy. Under Title IX, when University administrators become aware of sexual misconduct violations, they are required to take steps to understand what occurred and to respond appropriately. This includes referring the matter to the Title IX Coordinator so that the allegations can be investigated in a prompt, equitable and impartial manner.

In November of 2017, the Office of Diversity & Equity (ODE) did launch an investigation of the alleged sexual assault, but only after receiving a complaint brought forth by the Women’s Center Coordinator with whom Officer ___ recently had sought support. While being interviewed by ODE, Officer ___ identified her alleged assailant as Officer Curtis Lollar and reported that he had sexually assaulted her three times. ___ stated that the first incident occurred on campus during the summer of either 2013 or 2014, the second incident occurred on campus about one month later, and the third occurred at Lollar’s home about a year later.

After being informed of this information by ODE, Chief Sneed contacted State’s Attorney Brian Preleski who advised him to contact the State Police Major Crimes Division. During my meeting with Attorney Preleski on July 7, 2018, he informed me that no case was pursued because Officer ___ would not file an official complaint.

Due to the time that has lapsed between the alleged incidents and the reporting of them, there was no opportunity to identify a crime scene or gather any evidence. Also, due to ___ decision not to undergo additional questioning following her ODE interviews, it was impossible
to obtain information from her that may have helped prove any incidents occurred. Therefore, it is my opinion that it is not possible to substantiate Officer [redacted] claims against Officer Lollar.

After ODE’s investigation launched, Chief Sneed says he became aware of another set of alleged incidents involving Officer Lollar. According to Sneed, he approached his staff to determine if anyone else had any knowledge of Officer [redacted] claims or other issues. It was, at this time, he told me, that [redacted] informed him that she twice had been sexually assaulted by Lollar. She stated that both incidents occurred in the [redacted] while other parties were present in the room but could not see what happened. [redacted] advised Chief Sneed that these incidents occurred before he came here (2014), which would place them outside the statute of limitations precluding a criminal investigation. Upon hearing her story, Chief Sneed referred [redacted] to ODE.

Of note, ODE records and the Shipman & Goodwin investigation found that it was Officer [redacted] who initiated the contact with Chief Sneed after she received an ODE interview request and wanted to inquire of the Chief as to the reason for the ODE request. She asked the Chief if it was about Lollar and then informed him of her alleged interactions with Officer Lollar. According to [redacted], these incidents occurred long before 2014, thus, putting them beyond the statute of limitations for criminal investigation.

Currently, CCSU administrative action is proceeding against Officer Lollar, who has been terminated. Officer [redacted]. It is my recommendation that the administration make every effort to keep Officer Lollar from returning to the Department due to the nature of his behavior as determined by the investigation conducted by Shipman & Goodwin LLP. Furthermore, his return would likely be extremely disruptive and would present significant concerns related to the potential for retaliation and a hostile working environment.
To: Mr. Bernie Sullivan
From: Gregory Sneed, Chief of Police
Date: July 17, 2018
Re: Sexual Assault Allegation

Please see the following per your request.

On November 17, 2016, Lieutenant Dercole met with Central Connecticut State University Police Officer, [Redacted] in his office to discuss her performance/work product on a work related matter.

It is my understanding, that as the Lieutenant began discussing the matter with Officer [Redacted] she mentioned something about the hard time she has had over the past year or more. At some point during the conversation, Officer [Redacted] asked if she could talk off the record and got up and closed the door. It was at this point when she stated that she had been sexually assaulted by a member of this department. Upon hearing this, the Lieutenant immediately said that he needed to report this to Chief Sneed. Officer [Redacted] responded by continually pleading with the Lieutenant, not to tell me and that she believed she was talking to the Lieutenant as a friend.

Lieutenant advised Officer [Redacted] that he was required to tell me: It was at this point, that Officer [Redacted] declined to provide any additional information pertaining to the case. It is my understanding that the Lieutenant attempted to obtain details related to the allegation, but Officer
refused to provide any additional information, stating I will never tell you a name.

It is my understanding that during this meeting, the Lieutenant offered her the services of the University, to which Officer said that she did not trust the people of our Diversity and Equity office. She stated that she had been speaking to her church group and that she was comfortable with them. During this meeting, Officer said that she had put the assault behind her and if she ever decided to come forward, she would come to tell the Lieutenant.

It should be noted that Lieutenant Dercole is a seasoned investigator who has successfully investigated numerous sexual assault and other serious and lesser criminal cases.

As I had been out of work for a personal matter, upon my return on the morning of December 5, 2016, Lieutenant Dercole came into my office and advised me of the aforementioned incident. Within that briefing, he advised me that Officer made a verbal statement to him, of being sexually assaulted by a department member, but she refused to provide any additional information pertaining to the assault. I asked him had he asked the basic interview questions to try and solicit a response, such as; (a) Who was the accused, (b) was it a present member or past member, (c) when and where did this occur, (d) what degree of sexual assault, etc. He explained that he attempted but Officer refused to provide any additional detail.

After my briefing from the Lieutenant, and it being reiterated that she was adamant about not speaking to me (I was going to try and meet with her myself), I advised the Lieutenant to call Officer back into his office and attempt to re-interview her. Additionally, I advised him to re-offer her the services of the University and outside services such as, but not limited to, the YMCA, EAP.

Once the Lieutenant had left to attempt a second interview, I contacted Dr. Richard Bachoo and filled him in on the allegation. I advised him that I had tasked the Lieutenant with attempting to initiate a second interview.
On December 6, 2018, Lieutenant Dercole attempted to re-interview Officer [redacted]. In their meeting he informed her that he had informed me about the incident, and he wanted to talk to her about the allegation. Officer [redacted] again refused to provide any of the basic elements needed to establish probable cause, such as: (a) Name of the alleged accused, (b) number of accused, (c) gender of the accused, (d) the basic criminal elements needed to establish the degree of sexual assault, (e) location of assault, (f) window of time (how long ago), (g) was it a current member of the department or past member, (h) did it occur on campus or off, (i) did it occur on duty or off, potential witnesses (j) and finally, did it actually occur.

Lacking a victim willing to come forward and make a complaint (after two separate attempts to interview her), and the basic information needed to pursue a criminal investigation, I recognized that from the criminal perspective, I had an unsubstantiated allegation of a sexual assault. I instructed the Lieutenant to document his efforts, and I contacted Dr. Bachoo and filled him in.

At this point, we contacted Human Recourses and spoke to Anna Suski-Lenczewski to fill her in on the facts surrounding this case. After discussing in detail the victims’ rights to not file charges or provide any details, and ensuring that we had offered services such as EAP and our other resources; we concluded that we had as little to move forward with administratively, as we did criminally. At this point, the allegation was documented, counselling services had been offered. The employee stated that she had found someone to talk to about the incident (her church group), and from a criminal and administrative perspective, we could not move forward without any additional information.

Respectfully,

Gregory B. Sneed, Chief of Police
From: Lt. Dercle
Date: 11/17/16
Subject: Officer [redacted]

On 11/17/16 at approximately 3:30 P.M., Off. [redacted] arrived at my office regarding an Evading incident she investigated and reported the complainant did not want to press charges. I wrote to her in Case Management that an estimate of damage is required, which could determine if a warrant is necessary. Also, she should not ask the complainant about pressing charges, as it may be looked upon as if Off. [redacted] was attempting to avoid completing a warrant. I told her the complainant came in and filed a police report so there was no need to ask after the investigation if she wanted to press charges. Off. [redacted] stated she knows people talk about her and say she doesn't know anything about police work. I told her no one thinks that about her that everyone can get better at their job.

Off. [redacted] then stood up, closed the door and asked if she could talk to me. She said, you know I have gone through rough times in the past year and had like a nervous breakdown and wanted to thank me for being there and always watching out for her. She stated there were other issues she has dealt with that were not discussed. She said she wanted to talk “off the record” and wanted to speak to me as a friend and not her lieutenant. Off. [redacted] stated she was sexually assaulted by a member of this police department, but said she will never tell me who, where or when it occurred, as the Lord helped her put it all behind her and does not want to talk about it anymore. I said she should have told me sooner as she should not have to come to work every day and see this person.

When I said I would have to tell my boss (Chief Sneed), she walked over to me and said, “Please LT, I came to you as a friend, not a worker”. I explained I need to advise Chief Sneed and she begged and begged me not to, as she has moved on and did not want me to tell anyone, but if she ever decided to report it, she would come to me first. I said I would think about it and she asked me to advise her first if I were to tell anyone.

Chief Sneed is away on vacation for (1) week, but I will speak with him upon his return.

On 12/5/16, I advised Chief Sneed regarding this incident and was told to document this incident (which I did on 11/17/16).

On 12-6-16 I called Off. [redacted] in to my office and told her that today I informed Chief Sneed what she had told me regarding her assault. She stated again that she did not want to say anything just wanted to put it behind her. She stated that her Pastor, Psychiatrist and mentor helped her move on and they also tried to have her make a complaint.
Hi Bernie,

I can't recall if Richard Bachoo, Chief Sneed and I actually met in November of 2016 or whether the two of them called me from the Chief's office and had me on speaker, which happened often to discuss various matters.

The following was relayed to me during this conversation:

- During a meeting between Lt. Dercole and Officer [redacted] addressing work performance issues and/or failure to follow department directives on the part of Officer [redacted], Ofcr. [redacted] made a statement that she had been sexually assaulted in the past by a co-worker.
- She did not name the assailant, did not indicate when the assault occurred, nor did she indicate where.
- When asked for more information, she told Lt. Dercole that she was “passed it” and didn’t want to discuss any details.
- Lt. Dercole told her that he would have to report this to Chief Sneed, at which time Ofcr. [redacted] implored him not to.

The discussion which occurred between Bachoo, Sneed, and myself was a review of what information we had. We did not know if this had occurred during Ofcr. [redacted] employment with CCSU, her prior agencies [redacted], or some prior place of employment since we did not have any indication of the time frame of the assault. I had asked Chief Sneed if there was a basis for a criminal investigation and he replied that given the information he had, there was no action that he could proceed with as a police action. We discussed the possibility of launching an internal investigation here but given that Ofcr. [redacted] did not provide a time frame nor a name of her assailant, we did not believe there was anything we could investigate.

My understanding was that Chief Sneed was going to attempt to talk to her and see if she was willing to provide any more information on this. I had advised the Chief to refer her to the EAP, but understood that she was seeing a counselor privately.

Anna

Anna E. Suski-Lenczewski
Chief Human Resources Officer
Central CT State University
1615 Stanley St.
New Britain, CT  06050
Phone (860) 832-1757
Fax (860) 832-3197

From: Sullivan, Bernard R. (Public Safety)
Sent: Thursday, July 19, 2018 7:46 AM
To: Suski-Lenczewski, Anna E. (Human Resources) <lenczewskia@ccsu.edu>
Subject: Off [redacted]

Hi Anna
TO: Zulma R. Toro, CCSU President
FROM: Bernie Sullivan, Assistant to the President for Safety
DATE: October 18, 2018
SUBJECT: Review of the CCSU Police Department

In conducting a review of the CCSU Police Department, I read all personnel files and pre-employment background investigations of employees. I also reviewed reports written by Attorneys Mehta and Engler of the firm Shipman and Goodwin and reviewed documents from the Office of Diversity and Equity. I also reviewed documents related to the Police Department’s accreditation and to the Clery Act. I also conducted a review of existing policies and procedures of the Police Department. In addition to the document review, I spoke to members of the Department and reviewed the staffing and supervisory levels.

These are my findings:

1. Disrespectful Behavior

   There is sufficient evidence that male employees need to recognize female employees as equals and treat them with appropriate respect. One officer in particular engaged in more serious inappropriate behavior. That officer is presently terminated. It also was noted that male and female employees both have sometimes engaged in inappropriate conversations in the workplace.

2. Discipline Lacking

   Whether an officer is late for work, fails to report for a duty assignment, or violates other rules, there is no progressive discipline. The record shows that officers are given documented counseling, even if the behavior is repetitive (There was one exception with an officer receiving a three-day suspension for an infraction). Clearly, if employees believe they will never receive any corrective action greater than counseling, which is not considered discipline, this creates a lower level of expectation as to the importance of following rules and regulations.

3. Supervision Insufficient

   The number of sergeants needed to properly supervise assigned officers is insufficient. Presently, one sergeant is assigned per shift. Based on my review of payroll records, sergeants are shown to actually work an average of 190 days a year (taking into account vacation, sick time, training time, and other leave).

   Under the existing system, when sergeants are off, an officer assigned to the shift is designated and assigned to serve as the officer in charge (OIC) for that shift. This is an antiquated system which routinely puts peers into the position of supervising peers. It
also places individuals in charge of a shift who have not, via any process, shown that they have the necessary skill set to function in this capacity, or, worse still, may have demonstrated through their behavior that they are not qualified to serve in a supervisory capacity.

This system has been in existence prior to Chief Sneed's arrival. Since the department was relying on a hybrid version of supervision using peers to supervise each other, it is understandable that the troubling behaviors referenced above could develop. Chief Sneed says he periodically asked his supervisor and Chief Administrative Officer, Dr. Bachoo, for more supervisory staff but was denied. In addition, due to the lack of appropriate clerical support, the Chief indicates that he has to handle tasks such as data entry himself, which prevents him from doing those management things he should have time for, such as conduction inspections of Department activities, reviewing personnel files and actions, and other routine administrative functions.

It should be noted that the Police Department's funding has consistently been reduced since at least 1998 if not before that time. The funding was managed by the Chief Administrative Officer Dr. Bachoo, who apparently shared few details with Chief Sneed.

4. Understaffed

At the present time, the department is understaffed. Three recruits were recently hired but won't be available for individual assignments for about nine months. I will be providing a separate recommendation regarding staffing.

5. Inappropriate Hiring

I have identified five individuals, hired between 2009 and 2013 from four prior employers, whose hiring I consider questionable. In my opinion, three of them should not have been hired. The other two, while questionable, could have been hired but specific areas should have been monitored during their probationary period.

During the background investigations of the various candidates referenced above, the following information was revealed that should have been cause for concern:

- Prior employer stated they would not rehire;
- Prior use of hallucinogenic drugs;
- Questionable polygraph exam results that should have triggered an order for a second polygraph exam, but did not;
- Failure to disclose financial and prior employment history of a derogatory nature; and
- Prior serious discipline with previous employer.

I have discussed these questionable hiring decisions with various officials from the Police Officer Standards and Training Council (POST) including its assigned legal advisor, Assistant Attorney General Stephen R. Sarnoski, its Police Academy Administrator Thomas Flaherty and its Compliance Officer, William Tanner. POST officials have indicated that, based on the information available to them at this time, they believe that
the officers in question do not meet the POST criteria for decertification (See attached POST letter).

6. **Human Resources Input On Hires**

In one instance, the Human Resources Department questioned the approval of a hire because the candidate had listed another state agency as a prior employer and suggested to Dr. Richard Bachoo, the Chief Administrative Officer who oversees the Police Department, that he should not approve the hiring of this candidate since no information from the other state agency was in the file.

Chief Powell sent an email to Dr. Bachoo assuring him that, after a preliminary review, the candidate appeared to be acceptable. Chief Powell included in the memo that the candidate had committed a serious violation at the previous agency. He also pointed out that time had passed since the violation and that the candidate had not committed a felony or misdemeanor. He stated that he would recommend the candidate be hired and that they would follow up with a polygraph and more background.

Had Dr. Bachoo followed up, he would have found that the candidate's polygraph results were questionable and should have required a second polygraph. That was not done. Also, he would have learned that the candidate had another questionable polygraph conducted by another state agency and had been denied employment there prior to applying to CCSU. In fact, while not charged, the candidate had committed a misdemeanor offense at a prior employer.

The background process itself was flawed because there was no allowance for investigators to document recommendations and the hiring was solely controlled by the police chief. Not surprisingly, three of the questionable hires (coming from different employers) have either received discipline or performed at a below-standard level since being employed here.

7. **Title IX Violation**

Failing to report an alleged sexual assault to the Title IX coordinator at an institution of higher education is a violation of mandatory reporting principles. Chief Sneed notified his supervisor, Dr. Bachoo, of a sexual assault complaint by an officer. However, Dr. Bachoo did not see to it that the Title IX coordinator was notified. I have advised the chief that, in the future, he cannot rely on his supervisor to make such report and should instead himself ensure Title IX notifications are made in a timely manner.

8. **Hiring Retiree Officers**

The Shipmaa and Goodwin report refers to issues with the hiring of several retired Hartford Police officers. Six retired Hartford police officers were hired by CCSU. Two of them are on my list of questionable hires - and one of the two should have definitely not been hired in my opinion. The other four officers were qualified and two have earned promotions. Based on my document review and my conversations with officers who may
not have been interviewed previously, it appears there may have been some issues, initially, but the officers have since assimilated into the campus community.

I would note that hiring retired certified police officers can be quite worthwhile through the savings in training cost and the wealth of experience they offer. I know of other police departments that have been highly satisfied with the Hartford retirees they have employed. The issue before us is the inappropriate hiring of individuals with unacceptable backgrounds, not their prior service with a particular law enforcement agency.

9. Accreditation Issues

In 2008, the CCSU Police Department lost its accreditation by CALBA. The assessment team noted, among other issues, that Chief Jason Powell did not show up for the public meeting and was 10 minutes late for his meeting with the team. According to the assessment team, “It was apparent that the agency was not committed to the accreditation process” (See attached CALEA Assessment Report).

Based on a review of CCSU’s Clery Act submissions in 2012 and 2013, the University was fined more than $100,000 for various violations. The accreditation and Clery Act issues are significant. It would seem that Chief Powell and his supervisor, Dr. Bachoo, did not give these items the level of attention they needed. After Chief Powell’s retirement, Lt. Chris Cervoni was appointed acting chief. To Lt. Cervoni’s credit, he was able to regain accreditation for the department.

Another Clery Act violation occurred in 2016 under Chief Sneed’s leadership. According to a review by University Counsel Carolyn Magnan, the required Clery Act report was not distributed to campus by the October 1st deadline. Following the finding, Dr. Bachoo instructed the Police Department to publish and distribute the report by September 25th. In addition, Chief Sneed has established a mini task force with other University departments to assure compliance with the Clery Act (see attached email from University Counsel Carolyn Magnan).

On August 25, 2018, I met with former Chief Jason Powell to discuss hiring, discipline, accreditation, Clery reporting, and other matters that occurred during his tenure as Chief of the CCSU Police Department.

Chief Powell could not recall the specific hiring matters of concern. In addition, he stated that he was not aware of the serious fines imposed due to violations of the Clery Act. He told me that, at the time, he and the Director of Financial Aid shared responsibility for Clery Act reporting through their supervisor, Dr. Bachoo, to whom the Chief reported. Therefore, it seems that the burden was on Dr. Bachoo to ensure that such reporting was proper and timely.

Chief Powell also stated that he had never been given the clerical support staffing he felt was necessary to meet the needs of the department. My review concurs with this information and is reflected in my recommendations. Here again, it is my opinion this
failure falls under the responsibility of Dr. Bachoo given his oversight of and budgetary control over the Police Department. Public Safety, especially today, is a critical element in creating a safe environment and as such needs to be a priority when structuring the environment and the necessary budget to support it.

The following is a list of actions taken in response to my findings;

A. I have instituted a new background investigation sign-off that requires multiple layers of review, provides solid documentation as to candidate’s position and prevents any single individual from having the final approval for hiring. I also personally reviewed the files of the three new officers to ensure there are no issues.

B. Pre-background questionnaires will require candidate signatures to be notarized and affirmed as truthful. This will make it easier to decertify officers if, later, facts are discovered proving the candidate was untruthful.

C. I have instituted a new policy requiring supervisors to review employee personnel files prior to issuing any counseling or discipline. This will assure they are aware of any prior offenses and any discipline is reflected in evaluations. The police chief is required to conduct an annual inspection to assure these procedures are compliant.

D. I instructed Chief Sneed to work with CCSU Fiscal Affairs to draft a six month budget that deals with shortages until the new recruits are available for assignment. I also requested that the Chief put together a proposed budget for the future that will reflect adequate staffing levels and an appropriate number of supervisors, as well as clerical support staff. (Currently, there is only half-time clerical position).

E. I have requested one full-time clerical position be filled as soon as possible. I would note this is not a budgeted position so an increase in funding would be needed to accommodate this hiring.

F. Overall, the majority of issues with the department seem to have occurred under the tenure of Chief Jason Powell while he was reporting to Dr. Bachoo. For whatever reason, the loss of accreditation, Clery Act violations, inappropriate hiring, and other failings seem to have occurred without much regard by the Chief and Dr. Bachoo. They both seem to have lost appropriate oversight of the department that, in my opinion, led to the department coasting along at a low level of achievement.

G. The loss of accreditation, Clery violations and questionable hiring should have been loud alarm bells to Dr. Bachoo and caused him to conduct a close review of the department.

H. Based on all of my research, it appears that Chief Sneed has worked to get the department on track and is highly respected by staff. More than one individual referred to him as a breath of fresh air. The Department Staff did submit a vote of confidence in Chief Sneed.
He has recognized the shortcomings but it doesn't seem that his supervisor provided him with the staffing levels necessary for the department to function at an acceptable level.

My Recommendations:

- While the campus has grown significantly over the years, the Police Department staffing has been reduced. The Department has to be rebuilt and adequately staffed or it will fall further behind in its ability to perform its mission.

- I have worked with Chief Sneed to produce a proposed staffing level for both sworn and civilian positions and recommend it be approved.

- The priority should be on increased supervision and clerical staff. I will submit a plan regarding those matters under separate cover. I recognize that there are always budget constraints, but strongly urge the rebuilding begin as soon as possible as the hiring and promotional processes are time consuming.

- All members of the department should receive sensitivity training in conjunction with affirmative action training. Emphasis should be on the environment they work in and appropriate workplace conduct. As of August 10, 2018, Chief Sneed is working with Sarah Dodd, the CCSU Diversity Associate, to schedule some of this training.

- On September 6, 2018, several police officers will be attending the "Intervention Strategies for Law Enforcement Officers working with Victims of Sexual Violence" presented by Angelo Simoni, Jr., the CSCU Title IX Coordinator.

- Police Department supervisors will undergo training in areas such as evaluating staff and using progressive discipline and positive reinforcement with subordinates to enhance performance.

- The Chief and his supervisor must have regular meetings to stay on top of department issues. These meetings should be documented with written minutes for reference purposes. This will allow for early intervention should issues arise.

- Police Department staffing levels be increased.

Summary:

The CCSU Police Department has slipped in its performance level during the past several years. I believe this was caused by a lack of proper oversight by the previous administration. As the university grew in size, appropriate supervisory control did not keep up with that growth.
By instituting new regulations and implementing my recommendations, I believe the department can reach an acceptable level of performance.

I believe that the present Chief, Greg Sneed, can lead the Department forward by working with a supervisor that provides appropriate support and oversight. The Chief should continue to emphasize his approach to Community Policing and assure the Department has a good working relationship with the campus community.

With proper supervision, there is no reason to believe the department and its individual officers cannot provide appropriate police services to the campus community.

As of this writing, thanks to your direction we have been approved to hire three additional Sergeants and two full-time clerical support positions. This is a major step in moving the department forward and will serve the university well.

I believe that I have identified the failings in the department and provided you with appropriate recommendations to move beyond these failings. I am available to discuss my findings at your convenience.
Chief Flaherty,

As you are aware an investigation was conducted at the request of Central Connecticut State University (CCSU) by the Hartford law firm of Shipman and Goodman, LLC. That investigation centered on an allegation of sexual misconduct of a Professor. The firm’s investigation uncovered a similar complaint at the University’s Police Department. The firm’s investigative report to the University President was widely reported through several news outlets. One of their allegations was that the Police Department inappropriately hired several Police Officers. Former Hartford Police Chief Bernard Sullivan was hired as the temporary Assistant to the President for Safety and tasked with reviewing the Police Department’s practices, especially in the area of hiring Police Officers.

On July 18, 2018, I met with Mr. Sullivan at Assistant Attorney General Stephen Sarnoski’s Office to discuss this matter. At the time Mr. Sullivan advised that there were no issues regarding the POST hiring regulations. He stated that the problem appeared to be simply poor judgement in the hiring process. To that end he made available three (3) background investigation files for my review. He had not yet completed the review of all the Officer’s files, but had identified these three as containing the type of problems to which the law firm’s report was referring.

I reviewed the three files in question and find that Mr. Sullivan was correct in his assessment. Each of the files contain information that should have been more deeply investigated. However, in each case no further investigation was completed. Some of the prior conduct of these Officers might make them ineligible for hire as Police Officers in some agencies because of their local rules or hiring practices, but none of the issues or conduct are in conflict with the POST Council’s Regulations or State Statute.
The polygraphist's report for one of these officers noted "additional polygraph testing and/or background investigation may be warranted." No such follow-up was conducted on the Officer. This Officer's Psychological report states that

No further investigation into this Officer's background appears to have been undertaken.

The information uncovered on a second officer referring to on-duty and off duty conduct, and the discipline for these issues, was also ignored.

I spoke by phone to Mr. Sullivan in early August and he advised that he had completed a review of all CCSU Officer's files and found no others to be of concern.

At this time, with the information made available to me, I find that none of the hiring issues or prior conduct by CCSU Officers are in conflict with the POST Council's Regulations regarding Entry Level Requirements for Police Officers, or State Statute.

Respectfully Submitted,

William E. Tanner, III
Compliance Officer
Certification Division, POST-C

Cc: Bernard Sullivan, Assistant to the President for Safety, CCSU
March 7, 2008

Ms. Christie Goddard  
Program Manager  
Commission on Accreditation for Law Enforcement Agencies  
10302 Eaton Place, Suite 100  
Fairfax, Virginia 22030-2215

Dear Ms. Goddard:

In consideration of yesterday's conference call, I concluded that it is most probable that the overall recommendation of the onsite assessment team would prevail.

In light of this conclusion, it is in the best interests of this agency to withdraw from the current reaccreditation cycle, regroup, and reenter the process in the self-assessment phase. It is my understanding, that in doing so, our agency would have up to two years in which to correct current deficiencies, conduct a mock assessment and schedule a subsequent onsite.

Thank you for your assistance as we progressed through this difficult time. Please extend my thanks as well to Chief Louis Dekmar and Captain Ricky Pinksaw for taking the time to speak with us yesterday.

Sincerely,

Jason B. Powell  
Chief of Police
M. Summary:

The agency had a difficult time transitioning to the fifth edition standards. They were scheduled for an on-site assessment in August 2007, due to the lack of maintenance over the three year cycle, they were not ready. The agency decided to extend their on-site until January 2008 which mandated them to comply with fifth edition standards. This was a short turn around and was evident in so many of the files that were returned. The agency files were in poor condition, poorly labeled, not highlighted, and often incomplete. There were seventy six (76) files that were returned to the agency for additional proofs of compliance. This was a significant increase over the last assessment period, when the agency had twenty two (22) files in need of maintenance.

The agency had thirteen (13) files identified in applied discretion, which was a substantial increase over the two applied discretion files that were identified during the last on-site assessment. The agency had three (3) files that were in non-compliance. There were no files in non compliance during the last on-site assessment. Two files that were in non compliance dealt with the agency not conducting firearms training and qualifications in 2005. The other file was addressing the property and evidence function. The agency did not conduct audits and inspections of the property and evidence closet during the accreditation cycle.

The assessment team sent back close to a hundred file folders. The proper maintenance of these files over the past three years, as well as a comprehensive mock assessment could have assisted this agency during the on-site assessment, which did not occur. A major issue that was addressed during the last on-site assessment was the pending retirement of the current Accreditation Manager. This posed the urgency of the agency to select and train an Accreditation Manager. Officer Cheezlo was very helpful and cooperative. During the on-site assessment he was very positive and assisted the assessment team; however, it was evident that Officer Cheezlo was not properly trained in accreditation. It is understood that the agency has the option to choose any other than mandatory standard into the 20% category; but the lack of training forced the agency to take the accreditation manager training standard as a 20% category which proved self evident in the files.

During the on-site assessment the assessment team felt a definite disconnect from the agency, due to the fact of working out of the main building. The assessment team did not have full access to the police department, and had to request access to the main headquarters every time they needed to observe or interview someone from the agency. The assessment team worked in a 12 x 12 work space in a single wide trailer in the adjacent parking lot to the police department. The work space was tight and cramped. The assessors had to work at desks facing the walls and it was difficult to move around in the tight corners, also discussions were hampered since assessors were facing away from each other. The agency did not have a resource table of materials, i.e. Policy and Procedure Manual, Connecticut State Code. The assessors had to use the back of a calendar to track standards that were going out and coming
back in. The agency supplied the team with a dry erase board on Monday morning; however, they placed it on top of the file folders that were in crates on the floor. The Chief of Police did not attend the public hearing and was late for the exit interview by ten minutes on Wednesday morning. It was apparent to the assessment team that the agency was not committed to the accreditation process.

The agency submitted their annual reports during the accreditation cycle; the only concern that was identified was the agency was not in compliance with all applicable mandatory standards as was stated in 1.1. This was due in large part of the inexperience and lack of training of the accreditation manager.

The team reviewed all applicable standards and found the agency to be in compliance with 456 standards, while three standards were found to be in non-compliance. The concern was that the agency could not come into compliance with those standards due to the fact that they are action items that did not occur.

N. Recommendation:

In conclusion, based upon the observations and thorough examination of the files it was apparent that the Central Connecticut State University Police Department was ill prepared for their on-site assessment. The return of almost 100 file folders was a testament to this lack of preparation. Due to the lack of preparation over the last three years was obvious that this agency is not committed to the CALEA accreditation process. The location of the assessment team's workspace which was obviously inadequate left the team disconnected from the agency. This disconnection alienated the assessment team from the agency and made the team feel as though the agency did not want us in the main headquarters. However, based upon the three non-compliance standards, the thirteen applied discretion and seventy-six file maintenance issues, it was clearly apparent accreditation is not a way life for the Central Connecticut State University Police Department. The assessment team is unanimous in its recommendation that the Central Connecticut State University Police Department should not receive reaccreditation. It is understood that the findings of the assessment team may be modified or rejected and that the Commissioners will make the final accreditation decision.

Ricky A. Pinsaw
Team Leader
Subject: Response to US DOE Notification Dated June 13, 2017

Date: Wednesday, June 14, 2017 at 5:03:42 PM Eastern Daylight Time

From: Magnan, Carolyn (University Counsel)

To: Toro, Zulva R. (President CCSU)

CC: McDavid, Courtney (PresOffice), Palletier, Rita (PresOffice), Bachoo, Richard (Admin Affairs), Bishop, Richard (Financial Aid)

Dear President Toro,

I have reviewed the June 13th notification that you received today from the US Department of Education (hereinafter “DOE”) and, after conferring with Richard Bishop and Richard Bachoo, have learned the following facts. The DOE conducted a Title IV Program Review at CCSU in 2012. As Director of Financial Aid, Rich Bishop handled all correspondence with the DOE. After consultation with CCSU’s then Chief of Police, Jason Powell, he prepared CCSU’s response and filed it on June 14, 2013. I now have a copy of it and can provide it to you if you wish. As a result of the Program Review, CCSU was fined $87,175.00 in 2013. This fine was for violations cited in Finding #2 — failure to verify information submitted on certain students’ FAFSAs. CCSU paid this fine in 2013. Rich Bishop has assured me that all deficiencies cited in the Program Review have been corrected. As part of the Program Review, CCSU was also cited under Finding #7 for failing to issue a timely Annual Security Report (ASR) and Annual Fire Safety Report (AFSR) in 2012; both of which are required by the Clery Act. Both reports were 98 days late and the AFSR was lacking 2 years of required data. CCSU admitted these facts in its 2013 response. The $32,500 fine in the DOE’s June 13th letter to you is for this Finding #7. Dr. Bachoo has assured me that since the fall of 2012, CCSU has submitted its combined ASR and AFSR reports to the DOE by the October 1st deadline each year. He is still confirming, however, that those reports were distributed to the campus in a timely fashion each year. Only one year is in question; in 2016, the campus distribution may have been a few days late because of a weekend. In the future, to ensure compliance with the Clery Act deadline of October 1st, Dr. Bachoo has directed the CCSU PD to handle distribution of the report instead of waiting for another division to do so. Given these facts, my recommendation is that we not contest the fine.

Carolyn A. Magnan, Esq.
University Counsel

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