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21 and Assured Guaranty Municipal Corp.

22 UNITED STATES BANKRUPTCY COURT
23 EASTERN DISTRICT OF CALIFORNIA
24 SACRAMENTO DIVISION

25 In re:) Case No. 12-32118
26 CITY OF STOCKTON, CALIFORNIA,)
27 Debtor,) DC No. OHS-1
28) Chapter 9
29) Date: February 26, 2013
30) Time: 1:30 p.m.
31) Dept.: C, Courtroom 35
32) Judge: Hon. Christopher M. Klein

33 **EXHIBITS TO DECLARATION OF JOSEPH E. BRANN IN SUPPORT OF**
34 **SUPPLEMENTAL OBJECTION OF ASSURED GUARANTY CORP. AND ASSURED**
35 **GUARANTY MUNICIPAL CORP. TO DEBTOR’S CHAPTER 9 PETITION AND**
36 **STATEMENT OF QUALIFICATIONS**

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EXHIBIT A

JOSEPH E. BRANN

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EMPLOYMENT HISTORY

CEO **2001 – present**
Joseph Brann & Associates

Founder and CEO of Joseph Brann & Associates (also known as JBA), a consulting firm serving public sector clients, JBA provides tailored services to achieve improvements in policing, specializing in management performance and accountability, successful implementation of crime reduction strategies, and the adoption of effective policies and problem solving measures. Particular emphasis is placed on diagnosing the organizational and community culture so that community policing and community governance solutions developed are suitable to the unique aspects of the particular community. New and evolving best practices, policies, information system technologies and other considerations are evaluated for their ability to improve organizational accountability, crime reduction and public safety goals. The firm provides monitoring and oversight services of police reform measures on behalf of federal and state courts and DOJ authorities. JBA has served as a special consultant to the California Attorney General in evaluating and monitoring police departments, as a Special Master for the Federal Court in Ohio in monitoring police reform efforts in Cincinnati, and has recently agreed to serve on the monitoring team for the Seattle, WA consent decree.

Senior Vice President **1999 – 2001**
PSCComm, LLC

Served as Senior Vice President with this international public safety consulting firm, working with public sector organizations to address organizational development challenges, policy analysis and the development and application of crime reduction strategies and evolving technologies to improve police performance. The firm was headquartered in the Washington, D.C. metropolitan area.

Director **1994 – 1999**
COPS Office, U.S. Department of Justice

Appointed by President Clinton to serve as the founding Director of this newly created component of the Department of Justice, with responsibility for implementing key elements of the 1994 Crime Act. The COPS Office was the lead agency at the federal level for advancing community policing and administering grant programs to support over 13,000 local and state law

enforcement agencies, further “best practices” in the field, and drive research regarding policing strategies and programs. The budget for this program was \$9.6 billion.

**Chief of Police
City of Hayward, CA**

1989 - 1994

Served as Chief of Police in this ethnically diverse, urban community of approximately 150,000 residents located in the San Francisco Bay area. The Hayward Police Department received national recognition as a model community-policing agency during Chief Brann’s tenure as Police Chief, based on the innovations undertaken and leadership displayed in merging the concepts and philosophy of community policing with problem solving training and strategies.

**Police Officer to Captain
City of Santa Ana, CA**

1969 – 1989

Rose through the ranks and commanded various divisions and bureaus of the agency, including Field Operations, Personnel & Training, Narcotics & Vice, and Management & Budget. Santa Ana is a densely populated and very ethnically diverse community of more than 355,000 residents. The SAPD was one of the earliest pioneers in the community policing movement. Beginning in the 1970’s the SAPD was instrumental in developing innovative organizational strategies and programs that have long been recognized for their effectiveness in changing traditional policing culture and institutionalizing the community policing philosophy.

PROFESSIONAL ACCOMPLISHMENTS

COPS Office, United States Department of Justice:

Appointed by President Clinton as the founding Director of a new federal agency within the U. S. Department of Justice. The COPS Office provided funding for the hiring and redeployment of more than 100,000 police officers in over 13,000 law enforcement agencies, launching national strategies to support the adoption and expansion of community policing at the state and local level.

Created a national network of 35 Regional Community Policing Institutes to provide training and promote the sharing of best practices among law enforcement agencies and community partners.

Advocated for and provided funding to support research initiatives, launch new strategies and evaluate programs dealing with critical contemporary policing issues including: Racial Profiling, Police Ethics/Integrity, Youth Firearm Violence, Gangs, Domestic Violence, the Reintegration of Ex-Offenders and initiatives dealing with “Community Justice” and “Restorative Justice” models.

Pioneered the development and funded the implementation of “3-1-1” in communities across the

United States. 3-1-1, a national non-emergency phone number, was established to create improved access to non-emergency public safety and other local government services while reducing demands on the 9-1-1 system.

Hayward, California Police Department:

Established a strategic planning process, involving broad-based employee and community participation, which guided the implementation and evolution of HPD's Community Oriented Policing and Problem Solving (COPPS) philosophy.

Implemented a centralized data and information services bureau to support and oversee the installation of a state-of-the-art computer system capable of meeting the department's dispatching, records management and information systems (CAD/RMS/MIS) needs.

Instituted a decentralized patrol (Area Command) system in order to improve police department responsiveness and management accountability at the neighborhood level.

Substantially revised recruitment, hiring and training practices and significantly improved the Department's ability to attract successful candidates and establish a representative workforce. Many of these personnel strategies involved innovative approaches that have since been widely adopted by other agencies.

Successfully addressed major budget shortages and organizational downsizing by leading the agency through a process to identify alternative funding sources (new fees, grants, and enterprise fund charges) and service delivery strategies (service prioritization, creation of volunteer programs, expanded use of civilians, etc.)

Santa Ana, California Police Department:

Chaired the development of SAPD's "Five Year Plan" to develop long-term organizational strategies to deal with increasing service demands, growth and diversity in the community while also promoting improved collaboration with other governmental agencies.

Designed, developed and managed a wide array of crime prevention programs that received recognition as national models by the National Crime Prevention Institute, FBI, American Association of Retired Persons, California Department of Justice and Office of Criminal Justice Planning.

In concert with other local agencies, created a Regional Narcotics Suppression Program that resulted in asset seizures exceeding \$100,000,000 in five years and major reductions in street level narcotics activity. This program later served as a model touted by DEA for other regional drug enforcement programs involving federal, state and local agencies.

Implemented personnel and financial practices to correct significant financial and human

resource problems associated with disability retirements and worker's compensation claims. Disability retirements were reduced by 50% annually and industrial injuries by 47%.

Initiated and chaired the development of the California Model Building Security Ordinance. This document was subsequently adopted by the International Conference of Building Officials as Chapter 41 of the Uniform Building Code and has contributed to significant reductions in burglaries and thefts across the country.

EDUCATION

Master of Public Administration - University of Southern California, 1979

Bachelor of Arts in Criminal Justice - California State University, Fullerton, 1975

Graduate, FBI National Academy, 144th Session, 1986

PUBLICATIONS

2012 Brann, J.E. "Asking the Tough Questions", American Policing in 2022: Essays on the Future of a Profession, COPS Office, USDOJ.

2004 Campbell, D., J. Brann, D. Williams. "Officers-Per-1,000 and Other Policing Myths: A Leadership Model for Better Police Resource Management", Public Management, ICMA.

PRIOR EXPERT TESTIMONY

Sandra Casillas v. State of California, No. RCV073343 (Cal. Super., San Bernardino Co. 2007)

Garcia v. City of Sacramento, et al., No. 2:10-CV-00826 JAM-KJN (E.D. Cal. June 14, 2012), *appeal docketed*, No. 12-16434 (9th Cir. June 21, 2012)

PROFESSIONAL AFFILIATIONS/HONORS

National Advisory Board Member, Community Safety Initiative, Local Improvement Support Corporation

Member, International Association of Chiefs of Police (IACP)

Member, Police Executive Research Forum (PERF)

Former Ex-Officio Member – U.S. Attorney General’s National Advisory Committee on Domestic Violence

Former Member – Advisory Committee for the Federal Law Enforcement Training Center, Glencoe, GA

Past President and Member, Alameda County Police Chiefs’ and Sheriff’s Association

Former Member, International City/County Management Association

- Advisory Board Member, Community Policing Task Force

Former Member, California Attorney General's Advisory Committee on Community Oriented Policing and Problem Solving (COPPS)

Recipient of the “New Pioneer” Award, National Association of Drug Court Professionals, 2000

Honored as the “1998 Person of the Year” by *Law Enforcement News* for the creation of 3-1-1, the national non-emergency public safety phone number

Distinguished Alumni Award (1998) – California State University, Fullerton

EXHIBIT B

EXPERT REPORT OF JOSEPH E. BRANN

My name is Joseph E. Brann, and I have been retained by Sidley Austin on behalf of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. and its affiliates to provide expert opinions on the matters contained in this report in connection with the filing by the City of Stockton seeking relief under Chapter 9 of the United States Bankruptcy Code.

Specifically, I have been asked to address issues, concerns and opinions expressed by Police Chief Eric Jones and City Manager Robert Deis with respect to the attraction, employment and retention of police officers by the Stockton Police Department (SPD).

My opinions are based on my education and experience as described in this report, and my curriculum vitae is included as Exhibit A to my attached Declaration and incorporated by reference herein. I have attached hereto a list of documents considered. I reserve the right to modify or change my conclusions based on additional materials or information I may receive in the future.

SUMMARY OF OPINIONS

- I. The crime situation in Stockton is serious, but crime in Stockton has fluctuated over the past 25 years and has been higher than at present during that time, and the Part I crime rate has been falling for the past several years.
- II. Stockton does not have the lowest officer per thousand ratio among California cities, and this ratio, in any event, is a measure of limited use unless considered in the context of police officer utilization.
- III. Stockton's claim that officers will leave in a "mass exodus" if police pension benefits are reduced is not well founded.
- IV. There is no basis for the claim by Stockton that a modest reduction in pension benefits would lead to increased crime, place the community at risk, or endanger police officers through greater risk of physical harm.

Biographical Information

I have been involved in policing and public safety consulting for over forty years. My policing career started in 1969 when I began working as a police officer for the City of Santa Ana,

California. I was employed there from 1969 until 1990, and served in all ranks of the department from police officer through police captain.

My assignments during those years included serving as the Division Commander responsible for oversight, management and supervision of the Field Operations Division (Patrol & Traffic Bureaus) and, previously, as the Commander of the Administration Division (Personnel and Training, Management and Budget, Crime Lab, Information Technology, and Property and Evidence Bureaus). I had previously served as the Bureau Commander in Special Investigations (Narcotics and Vice), Management and Budget, Personnel and Training, and as an Area Commander in Field Operations.

From 1990 to 1994, I served as Chief of Police for the City of Hayward, California. In that position I was responsible for overseeing all administrative and operational elements of the police department, ensuring the goals and expectations established by the City Council and City Manager were achieved, formulating and updating organizational policies and directives to guide employees in the performance of their duties, developing and maintaining effective relationships with the community and other criminal justice system partners, and establishing professional policing standards as well as a strategic vision and plan for the department's operations and services.

In 1994, I was appointed by President Clinton to become the founding Director of the Office of Community Oriented Policing Services (COPS Office) for the United States Department of Justice. I served in that position until 1999. My role was to establish and administer a new federal agency responsible for advancing the practice of community policing as a national policing strategy.

The goals included supporting local law enforcement in their efforts to reduce crime and disorder, engaging the public in the development of policing strategies that are appropriate and suitable to address the needs of specific communities and neighborhoods, and to promote the development of more effective policing programs and tactics throughout the United States.

The COPS Office provided local and state police agencies with grant funding to support the hiring, redeployment and training of more than 100,000 officers and civilian employees, establish training programs for community members, promote the development of new technologies to support more effective and efficient policing strategies, and advance research and evaluation to study the effectiveness of public policies and programs intended to reduce crime and improve police effectiveness.

During my tenure as the Director of the COPS Office, I travelled the country extensively, meeting with local, state and federal elected officials to discuss policing strategies and programs,

staffing issues and other local needs, and the effectiveness of their policing strategies as well as the challenges they faced. I met with Police Chiefs, Sheriffs and their command staff to discuss these same issues and frequently spent time in the field observing their operations and programs.

For the past 13 years I have served as a police consultant to law enforcement agencies, city managers and local elected officials. This work typically involves conducting organizational assessments, analyses of police staffing levels and providing recommendations to my clients that are used to improve organizational performance and management accountability.

A significant amount of my consulting work over the years has been devoted to assisting with police reform efforts and monitoring of consent decrees and similar measures. I have served as a Federal Master appointed by the District Court in Cincinnati, Ohio to monitor the progress of the Cincinnati Police Department and as a special consultant to the California Attorney General (Attorney Generals Lockyer and Brown) wherein I was responsible for monitoring and evaluating police reform efforts in Riverside, CA and Maywood, CA. I have also worked with the City of Seattle, WA, where I provided assistance in negotiating the terms of a settlement agreement with the United States Department of Justice, and I am now serving as a member of the monitoring group responsible for overseeing that agreement. I am also currently assisting the Los Angeles County Board of Supervisors and Los Angeles Sheriff's Department with the implementation of reforms and improvements in the county's jails. I have also recently assisted the City of Oakland in their efforts to develop an acceptable alternative to the appointment of a federal receiver, as was requested by the plaintiff's attorneys in relation to their existing Negotiated Settlement Agreement.

Compensation

My fees for my professional services in this matter are \$300 per hour for report review, research, writing and case preparation and \$3,000 per day, plus expenses, for deposition and court testimony, none of which is contingent on the outcome of this matter.

DISCUSSION

I. Stockton Crime and Police Data

A. Crime Rate in Stockton

The City cites the crime situation as the most important public safety issue for the City. There is no doubt that Stockton has a high crime rate, but a review of Stockton's crime rates over time indicates that the crime rate today is lower than it was twenty years ago.

One of the most frequently cited crime statistics, for example, relates to violent crimes such as murder. Although there is no acceptable level of murders in any community, or even a murder rate in relation to the population, it is of help when examining crime to provide a more complete context, such as when one looks at the frequency of crime in relation to the population. Using an overall indicator, such as the Part I crime rate per 1,000 population (or even a specific sub-category of Part I crimes, such as the murder rate per 1,000 population) is a more reliable indicator of crime trends than using absolute numbers alone.

Chief Jones, in his declaration filed June 30, 2012, stated: "In 2011, there were 58 homicides in Stockton, an all-time record."¹ This is a statement concerning an absolute numerical value - the number of homicides (crimes).

"Crime Rate" helps to put this number into context by examining homicides in a growing city where the population size has also increased. Population density is a factor that affects the incidence of crime.

By comparing murder rates (events per thousand residents) in Stockton since 1990, for example, we find the city's murder rate has been the same or higher in prior years. In 1990, for example, with a population of 210,943, Stockton experienced 51 homicide events (rate of .24 per thousand). By 1991, the number of homicides increased from prior years to 55 events in a population size of 215,336 (a rate of .25 per thousand). Ten years later, in 2011, Stockton's population had risen to 295,136, so the 58 homicide events can be expressed as homicide rate of .2 per thousand.

Thus, while it is true the absolute number of homicides reached an "all-time record" in 2011, it is in fact the case that homicides are on a slight downward trend from their peak 20 years ago.²

An examination of violent crime rates in other categories leads to similar findings.

¹ Ex. 38 at ¶ 10.

² The intent of this paragraph is strictly to clarify the statistical understanding of homicides in Stockton. By no means does it suggest there is any acceptable homicide rate.

In 1990, for example, the city documented 168 forcible rapes (.8 per thousand). This number fell substantially to 90 events in 2011 (.3 per thousand), a decline of 46% in actual number and 63% in terms of the crime rate.

The crime of robbery initially increased from 1990 (6.2 per thousand) to 1993 when the city experienced its highest robbery crime rate (a rate of 7 per thousand), then fell to its current level of 4.5 per thousand in 2011, with fluctuations in between. Accordingly:

- Robbery *crime rate* declined 22% from 1990 to 2011, even though the absolute number of reported robberies is essentially the same (1305 in 1990 and 1323 in 2011).
- Robbery *crime rate* declined 36% from the peak year of 1993 to 2011 (1554 in 1993 and 1323 in 2011).
- The actual number of robberies reported dropped 15% from years 1993 to 2011. Indeed, the more recent drop in actual robberies (from 1615 in 2007 to 1323 in 2011) amounts to an 18% reduction in this violent crime category during the same years Stockton claims to have been adversely affected by lateral transfers to other agencies.

Aggravated assaults, on the other hand, show a *crime rate increase* of 75% (5.2 per thousand in 1990 to 9.1 per thousand in 2011), since 1990, but a *crime rate decrease of 5%* since the peak year of 2005 (9.6 per thousand).

An overall examination of Stockton's Part I crime rate reveals it was actually considerably higher in the early 1990's than it is today. In 1990, the Part 1 crime rate was 115 per thousand citizens, but it has since fallen to 66.5 per thousand in 2011, a drop of 42%.

In short, despite real and valid concerns about the amount of absolute crime in Stockton, the Part 1 crime rate has been *falling for the past several years*.³

B. Officer per Thousand Ratio

Chief Jones has stated that Stockton's officer per thousand ratio of 1.17 is the lowest in California for cities with populations above 250,000 and has further stated this ratio is much less than the "industry standard" of 2.7 per thousand for similarly-sized cities.⁴

³ The disconnect between perceived crime levels and actual crime levels is not unique to Stockton. The issue has been studied extensively and is the subject of a study funded by the COPS office. See GARY W. CORDNER, REDUCING FEAR OF CRIME: STRATEGIES FOR POLICE (U.S. Dep't of Justice: Office of Community Oriented Policing Services, 2010).

⁴ Ex. 38 at ¶ 7 (citing Ex. 40).

In fact, Stockton's ratio is not the lowest and there is no "industry standard," for officer per thousand ratios. Indeed, as I discuss below, the officer per thousand ratio as a measure of staffing adequacy is subject to a number of significant limitations.

Staffing levels vary dramatically across the country and even within a region. Officer per thousand ratios have traditionally been higher on the East Coast, in part as a result of differences in policing strategies, local funding decisions and even compensation packages. Every jurisdiction determines its staffing levels based on a variety of factors, and many of those factors are unique to that particular jurisdiction. Hence, it is neither practical nor reasonable to base staffing decisions on what other jurisdictions might be doing.

Further, there is a clear difference in staffing levels as one examines police staffing, moving from the east coast to the west coast. Sworn officer staffing levels are highest on the east coast and lowest on the west coast, and this has been true for many decades. When looking specifically at California, Stockton's officer per thousand ratio varies depending on the comparison cities used. For example, looking at all California cities with populations between 250,000 and 500,000, Stockton ranks seventh out of the nine cities in this population range.

All California Cities with Populations 250,000 to 500,000

City	Population	Sworn Officers	Ratio
Santa Ana	340,240	353	1.0375
Anaheim	338,392	389	1.1492
Stockton	292,047	342	1.1710
Riverside	301,859	361	1.1959
Bakersfield	333,458	469	1.4064
Sacramento	472,469	696	1.473
Fresno	484,734	793	1.6359
Oakland	409,723	674	1.645
Long Beach	462,267	889	1.9231

Examining those cities with populations of 200,000 to 400,000, Stockton's ratio is third highest of nine California cities.

Expanded Group of California Cities (200,000 to 400,000)

City	Population	Sworn Officers	Ratio
Fremont	205,477	178	.86627
Irvine	217,193	200	.92083
Chula Vista	229,060	230	1.0041
Santa Ana	340,240	353	1.0375
Anaheim	338,492	389	1.1492
Modesto	203,890	236	1.1574
Stockton	292,047	342	1.1710
Riverside	301,859	361	1.1959
Glendale	196,877	254	1.2901

This data, contrary to the claims made by Chief Jones, reveals that even in relation to comparably sized cities in California, Stockton does not have the lowest officer per thousand ratio. In fact, there are many cities in the state that have much lower staffing levels than Stockton.

The comparison above should not be used to argue that any city has "too many" or "too few" officers. The City of Irvine, for example, enjoys one of the lowest crime rates of any similarly sized city. Yet their officer-per-thousand ratio is remarkably low in comparison to other cities. At the same time, Santa Ana (a neighboring city of Irvine) long suffered from one of the highest crime rates in the state and the country in the 1960's and 1970's. However, despite a declining staffing level over the past three to four decades, that community has simultaneously experienced a significant reduction in their crime rate. This is an example of why it is a fallacy to attempt to establish a causal relationship between crime and police staffing levels.

Having looked at various police per thousand ratios in great detail during my career, I co-wrote an article in 2003 titled “Officer-per-Thousand Formulas and Other Policy Myths,”⁵ in which the title generally sets forth my view of the usefulness of the police per thousand metric. In that article my colleagues and I strongly argue that staffing ratios are not an appropriate way of determining actual staffing needs. There are many other variables that need to be examined and considered when determining an appropriate level of police officers in a community. Those include budgetary considerations, policing strategies, and alternative service delivery mechanisms.

For example:

- The “civilianization” of the police force can have a significant effect on the number of sworn officers actually patrolling the streets while at the same time skewing the officer per thousand ratio.
- In some jurisdictions, union contracts require that public works projects involving public roadways have a police officer present for traffic safety – a concept entirely unheard of in other parts of the country. These types of practices can lead to inefficient staffing and can influence the numbers of sworn officers within an agency.
- In some police departments, sworn officers are used in dispatch, records, evidence collection and other “non-enforcement” roles.

The Effect of Staffing Levels on Crime

There is an intuitive appeal to the assertion that more police officers equals less crime.

Certainly, “a cop on every corner” or even the substantial increase in officers suggested in the Braga report⁶ might influence the crime rate. But raw numbers tell nothing about the manner in which these officers are deployed. For example, the sworn officers used to staff jails, although useful and important, are not engaged in activities that affect the crime rate.

Even in Stockton, a historical review actually suggests an inverse relationship between sworn staffing levels and crime rate:

Year	Officers	Rate	Violent crime	Property crime
2005	377	1.4	.015	.067
2006	377	1.3	.015	.068

⁵ John Campbell, Joseph Brann & David Williams, Officer-per-Thousand Formulas and Other Policy Myths, 86 PUBLIC MANAGEMENT, March 2004.

⁶ See Preventing Violent Street Crime in Stockton, California (2006) Braga, A. John F. Kennedy School of Government, attached as Ex. 39 to the Jones Declaration, Ex. 38..

2007	378	1.3	.014	.062
2008	434	1.5	.014	.061
2009	438	1.5	.012	.053
2010	334	1.1	.013	.055
2011	313	1.1	.014	.052

This issue of the officer-per-thousand ratio and crime rate has been studied and examined over the years and variously suggests there may or may not be correlations between the two factors depending on which agency is examined, the staffing practices of the agency, and the statistical methods used.

The reason for the disparity in results is that many factors influence the overall effectiveness of the police. One very important variable, for example, is how resources are used, which is why the COPS Office considered how officers are utilized in all funding decisions.

In trying to understand why utilization is important, the ICMA report commissioned in 2010 by the City to review Stockton's police operations may offer insight.⁷ The report suggests police resources in Stockton were scheduled and deployed with an over-emphasis on employee convenience and an under-emphasis on "fit" between resource needs and availability. Although I was not asked to conduct an evaluation of Stockton's resource utilization for this report, it has been my personal observation and experience that this is an issue that may have a significant impact on organizational effectiveness. Moreover, agencies claiming to be "short-staffed" can often find the additional man-hours they need through better resource utilization and deployment models which focus on matching available resources with actual demands for service.

II. Reduction in Pension Benefits and Municipal Chaos

A. Stockton's Claim

The City has made claims in correspondence and in this proceeding that reductions in police pension benefits could so adversely affect retention and recruitment of police officers as to lead to "municipal chaos." In a memorandum to City Manager Deis, attached to a letter sent by City Manager Deis to Governor Brown, Chief Jones stated that twenty to forty officers could leave within the next year and that a "mass exodus" could occur if police pension benefits were cut:

"If forced to by the capital markets creditors and the court to reject our CalPERS contract and reduce pensions for existing and/or future retirees, it is possible, perhaps even likely, that we may face an employee mass exodus, and a dramatic increase in the number

⁷ See Ex. 81.

of trainee officers. This would be extremely dangerous given our rising violence rates, including assaults on officers. In fact, we simply may not be able to fill our positions at all, given the potential handicap in the marketplace.”⁸

City Manager Deis has echoed the concern about a “mass exodus” of police officers if there were a ruling in the bankruptcy proceeding requiring the impairment of police pension benefits:

“Stockton may have no other choice but to unilaterally reduce its financial support for existing and future retiree’s pensions, potentially sparking a mass exodus of experienced police officers in one of the state’s most violence prone cities.”⁹

The statement by Chief Jones that a “mass exodus” would occur upon any change in pension benefits is unsupported, as undoubtedly there is some level of pension reductions that could be undertaken that would not cause police officers to leave the Stockton Police Department.

Beyond that, for the reasons discussed below, a modest reduction in Stockton safety pension benefits would not lead to a “mass exodus” of officers.

During the same deposition, City Manager Deis raised the specter of “municipal chaos” if pension benefits were reduced:

“So if Stockton suffered a change in the CalPERS benefit to the point that people leave, especially experienced officers, and we’re unable to recruit in a very competitive labor market, we run the risk of creating municipal chaos.”¹⁰

Chief Jones and City Manager Deis suggest, but do not squarely assert, that a reduction in police pensions could so adversely affect retention and recruitment of police officers as to cause violent crime to increase in the City of Stockton, placing police officers and community members at greater risk of physical harm.

But my observation and experience lead me to different conclusions.

1. I have never personally seen or been made aware of any causal relationship between police pension benefits and the crime rate.
2. In addition, the claim of such a causal relationship is wholly unsupported by any contemporary, legitimate research or actual events in American policing.

⁸ Ex. 109 at 4.

⁹ Ex. 109 at 1.

¹⁰ Deis Dep. 191:22-192:1, Nov. 28, 2012. Along the same lines, Deis testified: “If we took or experienced a major change in PERS Retirement, we run the risk of creating huge dangers in the City of Stockton.” Id. at 191:8-10.

B. Effect of Modest Reduction in Pension Benefits on Stockton Lateral Transfers to Other California Agencies

Lateral Movement of Officers

Although clearly undesired by employees, reductions and/or changes in pension benefits have been taking place across the State of California and across the country. None have yet to trigger the catastrophic effects suggested above. In fact, in cities such as Berkeley, Palo Alto and Downey, police associations have negotiated benefit plan reductions in order to avoid layoffs that would otherwise result, while other communities have imposed or are in the process of imposing reduced pension benefits.

Chief Jones has argued that a reduction in pension benefits would adversely affect both retention and recruitment of officers. In support of his claim, Chief Jones has expressed concern about the number of senior officers who have left the Stockton police force to join other police agencies in California in the past two years and the impact of those departures on the effectiveness of the police force.

During his deposition, Chief Jones stated that departing officers had told him that they wanted to stay with the department but were leaving because of the reductions in wages and “additional pay” benefits over the past couple years.¹¹ In his memorandum attached to City Manager Deis’s letter to Governor Brown, Chief Jones discussed the loss of police officers and their replacement with less experienced new recruits and trainees:

“[W]e have more than 45 newly hired police officer trainees due to attrition. These 45 newly hired police officer trainees, hired within the past six months, account for 14% (approximately 1 of 7) of our entire police officer force. We expect to lose another 20 to 40 police officers to other law enforcement agencies over the next year; these positions will have to be filled by additional trainees unless we can attract qualified experienced police officers.”¹²

Stockton has provided data on the departures from the Stockton Police Department since January 1, 2008.¹³ In the five years since January 1, 2008 through November 26, 2012, there have been

¹¹ See Jones Dep. 118:6-17, Nov. 7, 2012.

¹² Ex. 109 at 4.

¹³ Officers Leaving from 2008 to Current (September 11, 2012) (Ongoing Confidential); Stockton Police Department Employee Count (Ongoing Confidential). On December 4, 2012, Stockton produced certain data on departures from the Stockton Police Department, including those officers who have retired, resigned, transferred to other police agencies, or been terminated. I am continuing to review this material given its production 10 days prior to the deadline for submission of my report and reserve the right to supplement or change my report based on additional study and review of this information.

93 retirements and 52 individuals who have left Stockton to join other law enforcement agencies in California and elsewhere. Of those 52 individuals, 21 had more than 10 years' experience, and 27 of the 52 left in 2012.

Chief Jones focused his attention on the loss of senior officers. Although the departure of 21 officers with 10+ years of experience to other agencies over a five year period is a source of concern, a considerably greater loss of senior officers during this period has occurred as a result of retirement (with 93 officers having retired, that number is almost four and a half times the number of officers with 10+ years of experience who transferred to other agencies during the same period). Even so, the police department has functioned competently, and the retiring employees have been replaced. Indeed, one of the reasons for the large number of new recruits is that thirty officers retired in 2011 and were replaced by younger officers.

During his deposition, Chief Jones also referred to conversations with the departing lateral transfers in which he stated they told him they were transferring because of the cuts in wages and benefits. Without being privy to those conversations or the recorded notes from any exit interviews, we do not know the reasons given by the transferring officers for their departure, but a review of the jurisdictions these officers departed for shows that many of the transferring officers were making a substantial lifestyle change by moving to agencies along California's Pacific Coast, the vibrant Bay area, or near the mountains.

Only 20% of the lateral transfers from Stockton remained in California's depressed central valley, while the remainder transferred to agencies in areas where such a job switch would likely involve uprooting their families and moving to an entirely new area. This is very different from the pattern in which an officer leaves one agency and goes to work for a neighboring agency offering better pay and benefits without moving the family (e.g. Sunnyvale to Santa Clara or Anaheim to Orange).

These transfers to coastal communities, the Bay area or mountain locations undoubtedly represent an opportunity to change lifestyle as well as employer.

Indeed, as in any field of endeavor, police employees are influenced by a host of non-economic factors, including but not limited to:

- Employment processes and job satisfaction;¹⁴
- Organizational leadership, reputation, assignment variety and culture;¹⁵

¹⁴ See Dwayne Orrick, International Association of Chiefs of Police, Recruitment, Retention, and Turnover in Law Enforcement: Best Practices Guide, <http://www.theiacp.org/LinkClick.aspx?fileticket=HDFc1guX%2FJA%3D&tabid=392> at 8-9 ("IACP Best Practices Guide").

¹⁵ See id.; see also Jeremy Wilson & Laura Werber Castaneda, RAND REVIEW (Spring 2011), <http://www.rand.org/publications/randreview/issues/2011/spring/police.html>.

- External factors such as housing market and location.¹⁶

Given the changes involved to make a lateral move to such a new position, and the economic, geographic, and lifestyle changes associated with the moves, it cannot be said that the only issue motivating such changes was a reduction in wages and benefits, or possible pension changes, particularly as cities such as Brentwood (27 miles west of Stockton) have ongoing recruitment with better pay and benefits (\$6098 -- \$7413) than Oceanside (\$5,020 – \$7,141) or El Segundo (\$5,407.54 - \$6,572.90), and thus would not have required relocation.¹⁷

In short, the variables in such a decision are so complex, so interwoven and their meaning to each employee so unique, that any action is the result of and interplay among a variety of influences.

There are various non-economic factors that may have affected the number of lateral transfers in the past few years. For example:

- The relationship between the City and the police has been rancorous over the past few years. The City's declaration of a State of Emergency, the imposition of contract terms on the police, the lawsuit filed by the Stockton Police Officers Association against the City, and the lack of an agreement between the City and the police union for an extended period are all indications that the relationship has been troubled.
- According to news accounts, police officers have been leaving the force because of the high cost of health care insurance and were not able to take advantage of various health care options over the past several months due to the lack of a contract.¹⁸
- The SPD has had five Chiefs of Police in the past six years, and such turnover in leadership undoubtedly impacts the organization and its police officers.¹⁹
- The police union purchased the house next to the City Manager in an effort to "intimidate" him.²⁰

¹⁶ See IACP Best Practices Guide.

¹⁷ Brentwood *Police Department Recruitment*, City of Brentwood, <http://www.ci.brentwood.ca.us/departments/pd/employment/index.cfm> (last visited Dec. 14, 2012); *Employment Opportunity: Police Officer Lateral*, City of Oceanside, https://jobs2.cityofocceanside.com/lfserver/11-79_ja (last visited Dec. 14, 2012); *Job Opportunities*, City of El Segundo, http://www.elsegundo.org/depts/human_resources/job_opportunities.asp (last visited Dec. 14, 2012).

¹⁸ Ex. 382.

¹⁹ M. Herder (2003-2006), W. Hose (2006-2008), T. Morris (2008-2009), B. Ullring (2009-2011), E. Jones (2012 to present).

²⁰ Deis Dep. 36:4-5.

These events are all indicative of an unsettled environment, and such an environment could lead police officers – even senior officers -- to look elsewhere.

I understand that the police union and City have recently reached a two-year agreement, which has been ratified by both the police union and the City Council. News reports state that the agreement may be a positive step that will bring a sense of stability and may help reduce the number of departures from the police force. One provision of the agreement reinstates certain longevity payment provisions for a select number of police officers who had previously been drawing such payments, and the inclusion of that provision may also encourage senior police officer retention.²¹

There are also factors indicating that Stockton's rate of lateral transfers exiting the agency is likely to slow even in the face of a moderate pension reduction.

- First, as noted above, the ratification of a two year agreement between the police and the City can contribute to a sense of stability in an environment in which there has been a great deal of uncertainty for the past few years.
- Second, seniority is a strong disincentive for a senior officer to leave a police agency. Seniority within a police agency governs shift assignments, job preferences, weekend and holiday assignments, and other staffing and job responsibilities. An officer who leaves Stockton for another agency goes to the bottom of the seniority list at the new agency and will join the rookie officers in getting the worst shifts and assignments. Moreover, if lay-offs begin at the new agency where the Stockton officer has transferred, that transferring officer (as one of the newest arrivals) would be one of the first to be laid off.
- Third, many of those officers who would be inclined to leave Stockton may have already done so.
- Fourth, reductions in the police workforce are occurring across the state of California. In a time of instability, a job “in hand” is something many are not willing to risk.

Reductions in Sworn Officers

²¹ Scott Smith, New Police Contract Goes to Vote, STOCKTON RECORD, Nov. 22, 2012, [http://www.recordnet.com/apps/pbcs.dll/article?AID=/20121122/A_NEWS/211220323/-1/a_special0267](http://www.recordnet.com/apps/pbcs.dll/article?AID=/20121122/A_NEWS/211220323/-1/a_special0267;).; Memorandum, T. Haase to Mayor and City Council, December 11, 2012 (attaching MOU between SPOA and City of Stockton).

City	2009-2010	2010-2011	2011-2012
San Diego	2754	2538	2514 (-8.7%)
San Jose	1786	1622	1510 (-15.5%)
Long Beach	1437	1329	1253 (-12.8%)
Oakland	1159	1084	961 (-17.1)
Anaheim	610	554	530 (-9.2%)

- Fifth, many California jurisdictions have already reduced their pension benefits obligations by adopting a lower tier of pension benefits for new police employees. Under the terms of the new Pension law enacted in August 2012, police officers transferring from one CalPERS plan agency to another CalPERS plan agency will receive the pension benefits that apply to new employees as of December 31, 2012. Thus, if the agency has adopted a lower pension tier that is in effect as of December 31, 2012, an officer who transfers after January 1, 2013 will receive that lower pension benefit, which is yet a further factor discouraging transfers to such jurisdictions.²²

These various factors make it less likely that any officer would leave as a result of a modest reduction in pension benefits.

Current Lateral Transfer Rates

For the five year period from 2008 to 2012 (through November 26, 2012), the 52 lateral transfers by Stockton police officers average 2.9% of the SPD work force (cumulatively) per year:

<u>Year</u>	<u>Total</u>	<u>Lateral</u>	<u>%</u>
2008	434	4	1.1
2009	438	11	2.5
2010	334	1	0.2

²² Stockton has established such lower miscellaneous and fire safety pension benefits for lateral transfers joining Stockton's work force after January 1, 2013. Memorandum, T. Haase to Mayor and City Council, November 27, 2012.

2011	320	9	2.8
2012	333	27	8.1
Average	372	10.6	2.9

In a 2006 publication by the California POST (Peace Officer Standards and Training) Commission, lateral transfers among California police officers averaged no less than 3.1% statewide since 1987 and was at a 4.7% level in 1997, with frequent fluctuations in between.²³ The City's five year average is certainly consistent with the California POST data.

An article in an International Association of Chiefs of Police publication on retention practices noted that "little has been done to establish an 'acceptable' benchmark or standard" on retention and then cited recent annual lateral transfer rates in Florida at 14% and 20%, Alaska at 35%, North Carolina at an average of 14% and Vermont municipalities at 8.25%.²⁴

Even looking only at the 2012 data, the lateral departure rate of 8.1% is higher than the California POST data but lower than the rates in many of the IACP jurisdictions and hardly a sign of a "mass exodus."

Chief Jones also expressed concern about Stockton's ability to recruit lateral candidates, stating in the August 14, 2012 memorandum that Stockton "has had difficulty attracting interested experienced police officers from other agencies, and in fact, has not located a qualified experienced officer from another agency in the past several years."²⁵ The Stockton recruiting data indicates otherwise.

The recruiting data provided by Stockton makes clear that at a minimum there are interested lateral candidates seeking employment with the SPD. In 2011, Stockton received 93 applications from lateral candidates, and in 2012, 71 lateral candidates applied.²⁶ It appears that the SPD did not elect to hire any of these lateral transfer candidates, but the submission of 164 applications at a minimum is an indication of interest by lateral candidates, and a sign that these candidates – particularly any 2012 applicants – believed the compensation offered was attractive notwithstanding the cuts to wages and benefits.

In addition, in November 2012, the City Council passed Chief Jones's Lateral Hiring Incentive Program to offer certain vacation and sick leave credits to lateral candidates as an inducement for

²³ California Commission on Peace Officer Standards and Training, Recruitment and Retention Best Practices Update (April 2006) at 81, <http://lib.post.ca.gov/Publications/RecruitmentBestPrac.pdf>.

²⁴ IACP Best Practices Guide at 6-7.

²⁵ Ex. 109 at 4.

²⁶ Report, Stockton Police Officer Hiring Statistics (2008-Sept. 17, 2012). (Ongoing Confidential).

even more experienced officers to apply and join the SPD.²⁷ Furthermore, a December 11, 2012 Staff Memorandum to the City Council expressed the City's "hope[] that the new Lateral Hiring Incentive Program recently approved by Council will provide a means of achieving additional hires," a clear indication that the City believed its pay and benefits were generous enough to attract the interest of lateral transfers.²⁸

C. Effect of Modest Reductions in Pension Benefits on Recruitment of New Officers

City Manager Deis in his August 15, 2012 letter to Governor Brown and Chief Jones in his August 15, 2012 memorandum state that the City would experience difficulties with recruitment given the "handicaps in the marketplace."²⁹ Chief Jones also testified about recruitment issues during his deposition and expressed concern with his ability to successfully employ new officers.³⁰

In the very same memorandum claiming to have problems with recruitment, Chief Jones stated that the SPD had hired 45 recruits in the past six months.³¹ The SPD's records indicate that the SPD in fact has hired over 70 recruits and trainees in 2012³². This is a sizable number of recruits and indicates that Stockton is capable of adding new officers to fill outstanding positions. The City's December 11, 2012 Staff Memorandum reaffirmed that the SPD would reach its authorized level of 344 positions by the end of the year, which would reflect hiring of more than 70 officers during 2012, notwithstanding what Chief Jones deemed to be below market compensation and benefits.³³

Indeed, during his deposition, Chief Jones indicated the greatest limitations on hiring were the employment process and training resources.³⁴

²⁷ See Ex. 403.

²⁸ Report, Burke to Mayor and City Council, Fiscal Year 2011-12 Unaudited General Fund Year-End Results, First Quarter 2012-13 General Fund Status Update, Authorization to Amend the 2011-12 General Fund Budget, and Authorization for Reserving 2011-12 Ending Fund Balance, December 11, 2012, at 701 ("December 2012 Budget Update").

²⁹ Ex. 109 at 1-2, 4.

³⁰ See, e.g., Jones Dep. 145:1-8, 145:21-23, 146:1-4.

³¹ Ex. 109 at 4.

³² This number represents the sum of the 64 hires in 2012 through November 26, 2012 as set forth in the Stockton Police Officer Hiring Statistics (2008-Sept. 17, 2012) (Ongoing Confidential) and the Stockton Police Department Employee Count (Ongoing Confidential) and the statements in the December 2012 Budget Update that an additional 13 recruits joined the police department in December 2012 as either graduates of or trainees at the police academy.

³³ Ex. 38 at ¶ 15; Jones Dep. 204:18-20.

³⁴ See Jones Dep. 146:12-148:9.

Another indicator of the City's ability to recruit is the number of applications to become new police officers. The City's data shows that academy graduate applications were over four times higher in 2012 than in 2008, which is evidence that any uncertainty over pensions was not affecting the applicants.³⁵ Indeed, the same data shows that in 2011 and 2012 over a thousand police academy certified graduates applied for positions in the SPD and another 1,700 without academy training had applied. News reports indicate that earlier this month over 1,000 applicants applied to become police officers.³⁶

In addition to the current ability of the SPD to add new recruits, recruitment beginning in 2013 should not be affected by any issues relating to pensions. Under the new Pension law passed this year, the pension benefits for new employees are set by state statute, and all new safety employees statewide will be receiving the same pension benefits.

For this reason, Stockton will be able to recruit against other cities on a level playing field with respect to pension benefits. For these reasons, Chief Jones's concern that Stockton will suffer a "potential handicap in the marketplace" is without foundation, and the SPD should be able to continue to recruit officers to fill vacancies. Thus, to the extent that lateral transfers continue, there is no reason to believe that the departing officers cannot be replaced, just as new officers replace retiring police officers in the ordinary course without any concern about "mass exodus" or inability to fill such positions.

D. Additional Issues

The statements by Chief Jones and City Manager Deis go beyond predicting a "mass exodus" of police officers and suggest the following scenario: A reduction in retirement benefits leads to disincentives to employment, resulting in unfilled (or insufficiently filled) police positions, an inability to control crime, and an "extremely dangerous" condition or "municipal chaos." As noted above, however, the claim that transferring officers cannot be replaced is contradicted by the evidence that the SPD has hired roughly 70 officers and recruits in calendar year 2012. In addition, in his testimony, City Manager Deis was asked "whether or not there's going to be a threat to safety depends on how much you vary from that median or the average," and he responded "That would be one major factor, yes," clearly conceding that there could be changes to pension benefits that would not threaten public safety.³⁷

³⁵ Report, Stockton Police Officer Hiring Statistics (2008-Sept. 17, 2012) (Ongoing Confidential).

³⁶ Melinda Meza, 1,300 Apply to Become Stockton Police Officers, KCRA.com (Dec. 12, 2012), <http://www.kcra.com/news/1-300-apply-to-become-stockton-police-officers/-/11797728/17756560/-/odrhem/-/index.html>.

³⁷ Deis Dep. at 253:8-13.

The assertions made by Chief Jones and Mr. Deis also include a number of unsupported assumptions:

- One assumption is that less experienced officers are assaulted more frequently and/or more severely than officers with a greater level of experience. There is no industry recognized evidence to support such a correlation.

Although some research does indicate that younger officers account for a larger percentage of the injured-officer-population than older officers, there has been no examination of the variables that underlie such a finding, such as the extent to which the younger officers have more or less experience than their counterparts, the manner in which the injuries occurred, the types of injuries or the positions held by and the activities of those officers at the time of their injury.

The difference in injury rate could be more readily explained, for example, by the fact that less experienced officers are more likely to be on patrol assignments while more experienced officers are likely to be detectives and in a wide range of other administrative and support roles. Therefore, the older officers would be less likely to be exposed to the same risks as their younger counterparts who are on patrol.³⁸

- It should also be noted that only a small fraction of officer injuries are the result of violent assaults. It has been my observation and experience that violent assaults on police officers – recognizing that no violent assault is tolerable – account for fewer than 5% of officer injuries. Indeed, in-service training and automobile accidents result in approximately the same number of injuries as those attributable to arrest and control activities.³⁹
- Chief Jones's statement also makes the tacit assumption that less experienced officers are less effective in combating a rising violent crime rate than more experienced officers. In addition, Chief Jones also assumes that this reduced level of effectiveness leads to greater community risk.⁴⁰

³⁸ New Study Shines a Revealing Light on Police Injuries FORCE SCIENCE NEWS (July 1, 2012), <http://www.forcescience.org/fsinews/2012/07/force-science-news-207?> (detailing an IACP study funded by the U.S. Department of Justice Bureau of Justice Assistance).

³⁹ Id.

⁴⁰ Ex. 109 at 4.

There is no evidence to support such a contention. It has been my observation and experience that there are innumerable variables that contribute to officer effectiveness and any conclusions based on any single variable such as experience are not supported.⁴¹

- Once hired, it takes longer to train and prepare an academy level trainee than it does to train and ready a lateral applicant for patrol duty. Chief Jones's comments suggest that this difference in the training time required could result in an increased level of violent crime.⁴²

It has been my observation and experience that this increased amount of requisite training time has no causal connection to the crime rate.

Conclusion

Although Chief Jones and City Manager Deis raise the specter of "municipal chaos" if pension benefits are reduced, it is my view there is no evidence that a modest pension benefit reduction would lead to a "mass exodus" or would have an effect on the crime rate, public safety, or the safety of the officers.

⁴¹ For example, the "burnout rate" of senior officers has been extensively studied. It is, by definition, a function of time on the job. Moreover, considerable research links "burnout" to reduced levels of performance. William P. McCarty & Wesley G. Skogan, Job-Related Burnout Among Civilian and Sworn Police Personnel, POLICE QUARTERLY, Aug. 28, 2012.

⁴²Ex. 109 at 4.

DOCUMENTS CONSIDERED

- Deposition of Ann Goodrich, Nov. 6, 2012
- Deposition of Eric Jones, Nov. 7, 2012
- Deposition of Robert Deis, Nov. 28, 2012
- EX 032 – Declaration of Ann Goodrich in Support of City of Stockton’s Statement of Qualifications Under Section 109(C) (2012)
- EX 038 – Declaration of Eric Jones in Support of City of Stockton’s Statement of Qualifications Under Section 109(C) (2012)
- EX 039 – Preventing Violent Street Crime in Stockton, California (2006) Braga, A., John F. Kennedy School of Government
- EX 040 – Excerpts from Crime in the United States: 2010 (2011), Federal Bureau of Investigation
- EX 041 – Crime Analysis and Police Activity Highlights (2010) Stockton Police Department
- EX 042 – Table 8 / offenses known to law enforcement by state and city (2010) (excerpt from Crime in the United States: 2010 (2011), Federal Bureau of Investigation)
- EX 061 - Resolution by Stockton City Council Declaring a State of Emergency Based on Fiscal Circumstances (2010)
- EX 062 – Stockton City Council / Redevelopment Agency Concurrent Agenda for the Meeting of June 22, 2010
- EX 064 - Resolution by Stockton City Council to Continue 2010-11 Emergency Measures and Declaring a State of Emergency Based on Fiscal Circumstances for Fiscal Year 2011-12
- EX 069 – Resolution by Stockton City Council Declaring the Continuation of a Fiscal Emergency (2012)
- EX 079 – Response to ICMA Operations Report and Data Analysis for the Stockton Police Department (2010)
- EX 080 - Response to ICMA Operations Report and Data Analysis for the Stockton Police Department (2011)
- EX 081 – Operations Report and Data Analysis: Stockton Police Department (2010) International City/County Management Association (ICMA)

- EX 083 – Stockton Police Department Crime Comparison and Police Activity Highlights (2001)
- EX 084 – Stockton Police Department Recommendations for Calls for Service (2012)
- EX 085 – Police Officer to Population Ratio
- EX 086 – Reprioritization of Calls for Service, Department Special Order #12-S-224 (2012)
- EX 109 – Letter from Robert Deis to Governor Jerry Brown et. al., re: Reform of Public Pension Law and Practices (Aug. 15, 2012)
- EX 180 - City of Stockton Police, Indirect Cost Proposal (2010-11)
- EX 188 – Letter from Eric Jones to Blair Ullring re: Stockton Police Department’s 2012 Hiring, Staffing and Policing Plan (Jan. 19, 2012)
- EX 198 – Memo from Blair Ullring to Larry Lisenbee (Jan. 5, 2012)
- EX 203 – Budget Excerpt, Stockton Police Department (FY 2010-11)
- EX 377 - Resolutions by Stockton City Council Adopting Emergency Measures (June 21, 2011)
- EX 378 – Resolution by Stockton City Council Adopting Pendency Plan Changes for Fire, Police, and Other City Employees’ Contracts
- EX 381 – Taking Back Streets: Stockton Police, CHP Discuss Collaboration to Combat City’s Crime Rate, Stockton Record (Nov. 2, 2012)
- EX 382 – Department Finding Ways to Lure Officers, Stockton Record (Oct. 22, 2012)
- EX 383 – Financial Details Outlined for Camden Regional Police Force, Philadelphia Inquirer (Sept. 1, 2012)
- EX 384 – To Fight Crime, a Poor City Will Trade Its Police, New York Times (Sept. 28, 2012)
- EX 385 – Camden County PowerPoint presentation re: creation of Camden County Police Department
- EX 391 – Finding and Keeping the Right People: POST Recruitment Strategic Planning Guide, California Commission on Police Officer Standards and Training (2008)
- EX 392 – Prevailing Trends Report, California Commission on Police Officer Standards and Training (2012)

- EX 403 – Memo from Eric Jones to Mayor and City Council re: Police Lateral Recruitment Incentive Program (Oct. 23, 2012)
- EX 417 – Letter on Behalf of SCEA to Stockton Human Resources re: Transfer of SCEA Employees' Work to Police Union Members (April 12, 2011)
- EX 489 – Memo from Robert Deis to Stockton City Council (Dec. 15, 2010)
- EX 491 – Email from Ann Goodrich to Robert Deis re: Stockton Police Compensation (May 14, 2011)
- Memo from Vanessa Burke to Mayor and Stockton City Council (Dec. 11, 2012)
- Memo from Teresia Haase to Mayor and Stockton City Council (Nov. 27, 2012)
- Memo from Teresia Haase to Mayor and Stockton City Council (Dec. 11, 2012)
- Stockton Police Department Employee Count (Ongoing Confidential)
- Stockton Police Officer Hiring Statistics (2008 to Sept. 17, 2012) (Ongoing Confidential)
- Stockton Police Officers Leaving (2008 to Sept. 11, 2012) (Ongoing Confidential)
- Stockton Police Department Sworn Personnel (November 26, 2012) (Ongoing Confidential)
- Brentwood Police Department Recruitment, City of Brentwood, <http://www.ci.brentwood.ca.us/department/pd/employment/index.cfm> (last visited Dec. 14, 2012)
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