Proposal to Serve as the Independent Monitor for the Consent Decree regarding the Chicago Police Department
September 4, 2018

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Dear Ms. Hendrickson and Mr. Siskel:

This Proposal serves as a response to the Request for Proposals dated July 27, 2018, for an Independent Monitor for the Consent Decree regarding the Chicago Police Department.

As set forth below, we have assembled a team comprised of subject matter experts with complementary skills and experience. Katherine Lemire is the proposed named Independent Monitor (“Monitor”), supported by a core team including Demosthenes Long, Brent Larrabee, Michael Costa, David Burroughs, and Carol Rasor-Cordero, with additional support by StoneTurn personnel (collectively, the “Monitorship Team”). We provide the relevant experience of the core team members, as well as our distinguishing skills and experience in the following sections of this Proposal.

The experience and subject matter expertise of the proposed Monitorship Team renders us uniquely qualified to fulfill the likely mandates of the Consent Decree. We offer an unparalleled combination of subject matter expertise and monitorship experience, while also ensuring that the goals of the expected Consent Decree are accomplished in a cost-effective manner. We welcome the opportunity to discuss our qualifications with you.

Sincerely,

Katherine A. Lemire  
Partner  
StoneTurn
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Executive Summary and Overview of Methodology

The Monitorship Team’s work will adhere closely to the goals and guidelines set forth in the Consent Decree agreed upon between the State of Illinois and the City of Chicago (collectively referenced in this Proposal as the “Parties”) dated July 27, 2018. Those goals include, but are not limited to, developing a monitoring plan, reviewing policies and procedures, reviewing and approving implementation plans, conducting compliance reviews, conducting community surveys, maintaining a website and communications with the parties, offering technical assistance, and drafting reports.

As we describe in this Proposal, the StoneTurn Monitorship Team provides the requisite expertise to achieve the goals of the Consent Decree. Collectively, we are former federal and local prosecutors, law enforcement personnel, data analytics specialists, and subject matter experts. We are well-versed in policing practices, monitorships, federal and local laws, change management, data analytics, and collaboration and communication with diverse constituencies. In sum, the StoneTurn Monitorship Team will be able to expertly and efficiently ensure that the objectives of the Consent Decree are achieved and will have a lasting and measurable effect.

Resumés for the Monitorship Team are attached as Appendix A, and detailed cost estimates are enclosed as Appendix B.
Team Members: Background and Relevant Experience

We provide below a summary of relevant backgrounds of the proposed Monitorship Team. Our core team is comprised of seasoned professionals with backgrounds in prosecution, law enforcement, integrity monitoring, police training, and data analytics. The Monitorship Team possess the requisite experience to oversee and assist the City of Chicago (the “City” or “Chicago”) and the Chicago Police Department (“CPD”) in its efforts to achieve sustainable compliance with the Consent Decree. In addition to these core team members, StoneTurn is staffed by personnel who may be called upon to provide analytical and operational support, as needed. For additional details regarding qualifications and relevant experience, we enclosed the resumés of all team members in Appendix A.

Katherine Lemire

A former federal prosecutor, Ms. Lemire has an extensive background in law enforcement practices and monitoring engagements. Ms. Lemire served as an Assistant United States Attorney in the U.S. Attorney’s Office for the Southern District of New York, where she investigated and prosecuted public corruption, gang violence, and a multitude of other crimes. Before joining the U.S. Attorney’s Office, Ms. Lemire served as an Assistant District Attorney in the New York County (Manhattan) District Attorney’s Office. In addition, Ms. Lemire served as Counsel to the Police Commissioner at the New York City Police Department (“NYPD”). In that position, she managed a broad portfolio of operational, legal, and managerial matters for an agency comprised of more than 53,000 employees. Her work at the NYPD encompassed overseeing management initiatives, including an evaluation and overhaul of many of the NYPD’s programs and processes.

Ms. Lemire is a partner of StoneTurn, a compliance, investigations, forensic accounting, and expert services firm that assists attorneys, corporations and government agencies on a range of legal and compliance-related issues. Until recently, Ms. Lemire served as the Chief Executive Officer of Lemire LLC, a compliance and risk consulting firm, providing investigative support for various industries in the public and private sectors. Both StoneTurn and Lemire LLC have been engaged on multiple monitorships and compliance reviews ordered by courts and regulators.

Demosthenes Long

Dr. Long, who holds an Ed.D, has a distinguished law enforcement career spanning more than 30 years. He is currently a Clinical Professor in the Criminal Justice and Security department and a co-director of the graduate program in Homeland Security at Pace University. Prior to joining the faculty at Pace University, Dr. Long held multiple high-level law enforcement positions. He spent 21 years in the New York City Police Department, where he retired as an Assistant Chief. During his tenure at the NYPD, Dr. Long also served as the Commanding Officer of the Police Academy. In this role, he was responsible for the training of thousands of police recruits, as well as in-service training for uniformed officers, investigators, managers, and executives. Upon his retirement from the NYPD, Dr. Long served for five years as the First Deputy Commissioner/Undersheriff of the Westchester County Department of Public Safety, Division of County Police,
and held several high-level private sector security positions, overseeing security at one of the largest utility companies in the United States.

Throughout his career at the NYPD, Dr. Long served diverse communities and worked to improve relations with New York City’s diverse populations. As Commanding Officer of the Police Academy, he oversaw training geared toward improving officer relations with local communities. As we detail elsewhere in this Proposal, Dr. Long has extensive experience in managing and overseeing many of the topics addressed in the Consent Decree, including law enforcement practices generally, as well as community policing, crisis intervention, de-escalation techniques, propriety of stops and searches, interactions with youth and the mentally disabled, and a variety of community outreach initiatives.

Dr. Long presently serves on the monitorship team in connection with the federally appointed monitor of the NYPD. The monitorship, implemented in the aftermath of civil lawsuits, is focused on developing a set of reforms the NYPD’s policies, training, supervision, auditing, and handling of complaints and discipline regarding stops and frisks and trespass enforcement. The monitorship is also responsible for assessing and reporting on the NYPD’s progress in implementing the proposed reforms. As we detail elsewhere in this Proposal, Dr. Long is responsible for particular subject matter areas addressed by the monitorship team, including the review of police arrest and stop/question reports to assess compliance with court-ordered reforms. He also provides feedback on training, reviews civilian oversight cases, and reviews CompStat sessions to assess compliance.

Dr. Long has B.S. in Police Science and a MA in Criminal Justice from John Jay College of Criminal Justice, a J.D. from New York Law School and an Ed.D from St John Fisher College.

Brent Larrabee

Mr. Larrabee has extensive experience in leading and advising police departments, and in police monitorship work. Mr. Larrabee’s career spans more than 40 years. He has led multiple police departments, including police departments in Stamford and East Haven (Connecticut), and in Cambridge, Framingham, and Westwood (Massachusetts).

In 2013, Mr. Larrabee was chosen to lead the East Haven Police Department after the U.S. Department of Justice had commenced an investigation into civil rights violations. Mr. Larrabee oversaw compliance with the resulting Consent Decree and the subsequent revision of all policies and procedures as well as the training on these new policies. Under his guidance, the East Haven Police Department successfully accomplished the goals of the Consent Decree in a timely manner. The U.S. Department of Justice lauded Mr. Larrabee for this achievement.

Following his retirement from law enforcement, Mr. Larrabee spent years working as a consultant to law enforcement agencies domestically and internationally. He has provided technical assistance and advisory
services to multiple police departments. He was also engaged by the U.S. Department of Justice to provide technical assistance in Nigeria, where his work included improving relations between the community and the Nigerian Police Force.

Mr. Larrabee holds a Master’s degree in Public Administration from Framingham State College and a Bachelor of Science degree in Law Enforcement from Northeastern University in Boston, Massachusetts.

**Carol Rasor-Cordero**

Dr. Rasor-Cordero is a professor at St. Petersburg College, Florida, in the Bachelor of Science Public Safety Administration Degree Program, and a Senior Research Associate for the Center for Public Safety Management, the exclusive provider of public safety technical assistance for the International City/County Management Association (ICMA). She has significant experience in providing technical assistance, training, and project management services to law enforcement agencies throughout the United States. Dr. Rasor-Cordero has developed and delivered training on a multitude of topics, including firearms and defensive tactics. She has reviewed and drafted policies for multiple law enforcement agencies on a broad array of topics.

Utilizing quantitative and qualitative analyses as well as community feedback, Dr. Rasor-Cordero reviewed the performance of law enforcement agencies and provided recommendations for organizational change and improvement. She has created and delivered presentations to city/county leadership and community stakeholders and has conducted focus groups with diverse audiences. For example, Dr. Rasor-Cordero testified before the Florida Congressional Committee on Criminal Justice regarding gang growth and activity, a subject which she researched.

Dr. Rasor-Cordero retired as a Captain from the Pinellas County Sheriff’s Office (Florida). During her 25-year career in law enforcement, she served in multiple commands including Patrol Operations, Crimes Against Children, Economic Crimes, Training, and Community Services. While serving as the Commander of the Community Services Division, she established the Citizen’s Community Policing Institute, the Domestic Violence Unit, and the Sexual Predator and Offender Unit. She served as the agency’s training advisor and played a significant role in transforming the Pinellas County Police Academy from a vocational program to a progressive program that offers college credit at St. Petersburg College, and served as a certified firearms, defensive tactics, and police driving instructor. She also functioned as the team leader for the agency’s Hostage Negotiation Team and implemented the agency’s Critical Incident Stress Management Team.

Dr. Rasor-Cordero holds a Ph.D. in Education, and Master’s and Bachelor Degrees in Criminal Justice from the University of South Florida. She is a graduate of the Police Executive Research Forum Senior Management Institute for Police.
Michael Costa

Mr. Costa, a Managing Director in the Chicago office of StoneTurn, has extensive experience in data analytics. He has worked with public and private sector clients, and has provided data analytics expertise to clients on matters involving remediation, monitorships, fraud investigations and valuation. Prior to joining StoneTurn, Mr. Costa led the data analytics team at another consulting firm.

Mr. Costa has served as a Team Leader on one of StoneTurn’s monitorship projects in which he oversees data analytics and transaction monitoring. In this role, he assessed the design and operating effectiveness of several platforms and related areas of operations, including transaction monitoring, trader behavior, e-communication monitoring, payment filtering, and other data screening. Additionally, Mr. Costa has assessed remediation strategies for technology infrastructure, information systems, and data management and storage systems.

Mr. Costa has experience working with government entities including the City of Naperville (Illinois) and the City of Dallas (Texas). Mr. Costa worked with the City of Naperville to update its geographic information systems (GIS) by building an application allowing users to interface with underlying database structures. More than 10 years later, the city still uses this application to identify the location of resident-generated requests and complaints. Additionally, working with the City of Dallas, Mr. Costa led a Tax Increment Financing application submission for a historical remediation project eligible for $20.6 million in incentives from the city. The City of Dallas awarded the project the full amount of incentives and granted the site a landmark status.

Mr. Costa completed his MBA at the Kellogg School of Management of Northwestern University, where he specialized in Market Research and Analytics, including survey design and statistical analysis.

David Burroughs

Mr. Burroughs is a StoneTurn Partner. He oversees complex investigations and regularly supervises teams of investigators, forensic accountants, and analysts. Until recently, Mr. Burroughs served as a Senior Managing Director at Lemire LLC, where he supervised the firm’s work on the federal monitorship of a 20,000-member construction union. He also served in a managerial role in the monitorship of a Swiss bank.

Mr. Burroughs entered the private sector after completing a 25-year career with the Federal Bureau of Investigation (FBI). Mr. Burroughs’s career with the FBI included a broad range of assignments, culminating in his most recent position as Supervisory Special Agent assigned to the New York Special Operations Division. In that role, Mr. Burroughs managed and directed highly-sensitive investigations in support of criminal and counterterrorist operations.

Throughout the course of his law enforcement career, Mr. Burroughs served as the lead case agent on numerous complex investigations, including matters involving gang activity and white-collar crime. During the course of his career, Mr. Burroughs has established successful working relationships with numerous federal,
Community Liaison

If Ms. Lemire is appointed as the Monitor, we would seek an individual to serve as the Community Liaison. This individual's role would be of paramount importance, and duties would include spearheading the Monitorship Team's community engagement interactions, engaging Chicago’s diverse communities, and maintaining relations with other stakeholders in Chicago. This individual would also work to ensure effective and timely communication regarding the status of the City's implementation of, and compliance with, the Consent Decree. We expect that the Community Liaison will observe and lead community group meetings and engage in informal conversation with Chicago residents, particularly in the City's diverse communities. Given the importance of this role and the need for stakeholder buy-in, we will thoroughly vet this individual with community stakeholders and the Parties before adding this person to the Monitorship Team.

StoneTurn

StoneTurn is a compliance, investigations, forensic accounting, and expert services firm that assists attorneys, corporations and government agencies on a range of legal and compliance-related issues. With professionals located in more than 10 offices across the United States, including Chicago, StoneTurn provides expertise in a range of practice areas, including the following: Litigation, Investigations, Compliance & Monitoring, Forensic Technology and Data Analytics.

StoneTurn is a recognized leader in providing compliance and monitoring services to both public and private sector organizations. With more than 150 professionals, StoneTurn’s team includes former federal and local prosecutors, investigators, and data analytics specialists. The combination of these skill sets and experience has allowed StoneTurn to develop a methodology to work collaboratively with all levels of organizations to monitor and recommend improvements to organizational practices. StoneTurn brings the mindset, knowledge, skills, and experience to identify and assess risks, and prevent and detect violations of processes and controls, laws and regulations. Additionally, StoneTurn leverages the power of big data to execute and measure the effectiveness of ethics and compliance programs.

The Monitor and Monitorship Team’s Commitment to Diversity and Inclusion

The Monitorship Team is comprised of two women (Ms. Lemire and Dr. Rasor-Cordero) and one African-American (Dr. Long). Until earlier this year, Ms. Lemire served as the CEO of Lemire LLC, a woman-owned business enterprise (WBE), certified by multiple government agencies, including the U.S. Small Business Administration. We estimate that Ms. Lemire, Dr. Long, and Dr. Rasor-Cordero collectively will complete more than approximately 36% of the monitorship work.
Accessibility of the Monitor and the Monitorship Team to the City, the Chicago Police Department, and the Chicago Community.

As further explained below, each member of the Monitorship Team is able to dedicate sufficient time to the monitorship. We have selected team members to join this team in part due to their interest and ability to commit to this engagement.

Ms. Lemire will ensure that her work in connection with this monitorship receives paramount attention. She is not serving as the monitor on other matters at this time. With the resources of StoneTurn at her disposal, Ms. Lemire is able to re-distribute work within the firm to ensure that she has sufficient time and resources to devote to the monitorship. If required, Ms. Lemire could devote 80% of her time on this monitorship. Dr. Long's present engagement, namely the NYPD monitorship allows sufficient time for his participation in this monitorship. Mr. Costa and Mr. Burroughs are presently employed at StoneTurn and both could dedicate more than 75% of their time on this monitorship. Dr. Rasor-Cordero and Mr. Larrabee likewise provide sufficient flexibility to allow for work on the monitorship. Both could spend more than 80% of their work time on this matter. (Note: our estimate of allocated hours provided in Appendix B require less than 50% of each Monitorship Team Member’s work time.)

Internal Organization of the Monitorship Team

Ms. Lemire will serve as the named Monitor, and Monitorship Team members will report to her. With the support of the Monitorship Team and StoneTurn staff, Ms. Lemire will develop a monitoring plan, and will be accountable for completion of the Monitorship Team’s work. She will coordinate work of the Monitorship Team, and will serve as the primary liaison with the Court and the Parties. She will be primarily responsible for finalizing monitor reports to be filed periodically as required by the Consent Decree. Ms. Lemire will also attend community meetings, and meet with stakeholders, including members of the CPD and members’ bargaining representatives.

Given their extensive law enforcement backgrounds, Dr. Long, Mr. Larrabee, and Dr. Rasor-Cordero will oversee reviews of CPD policies, procedures, training materials, and implementation plans. They will provide technical assistance, if appropriate, and evaluate whether subject matter experts are required to provide additional assistance. Working in conjunction with Mr. Costa, they will conduct compliance reviews and audits to determine whether the City and CPD have complied with the requirements of the Consent Decree. Dr. Rasor-Cordero will play a substantial role in assisting Ms. Lemire in writing reports. Mr. Burroughs will also provide support in these areas.

Mr. Costa will oversee statistical analysis and data collection, including conducting community surveys. StoneTurn staff will assist in maintaining a public website for the posting of monitor reports and other public information. StoneTurn staff will also assist in logistics, collection and organization of documents, and report drafting.
The Community Liaison will ensure that regular meetings with community members and stakeholders occur, and attend those meetings. The Community Liaison will serve a vital role in ensuring that the City’s diverse populations are included in meetings, feedback and surveys, and that these populations have access to reports drafted by the Monitorship Team.

Examples of the Monitorship Team Working Collaboratively with the Parties and in a Cost-Effective Manner

The Monitorship Team will work collaboratively with the Parties and in a cost-effective manner through developing a strong working relationship with the CPD members assigned to work on compliance with the Consent Decree. The proposed Consent Decree states that the City and the CPD agree to hire, retain, or reassign current City or CPD employees to form a unit the knowledge, skills, and abilities necessary to facilitate compliance with the Consent Decree. (Proposed Consent Decree, ¶ 654.) Not only would the Monitorship Team work closely with these CPD personnel, but could assist this unit in transforming into a robust Project Management Office (PMO) to serve as a partner of the Monitorship Team. Close collaboration between a PMO comprised of CPD members and the Monitorship Team would not only facilitate data and other information transfer to the Monitorship Team, but would serve to lay the groundwork for the eventual transfer of the Monitorship Team’s duties and responsibilities to the PMO. (Similarly, Ms. Lemire created a PMO within the NYPD in her work on a far-reaching re-engineering project that addressed many aspects of the NYPD’s operations and infrastructure. The work and organization of the PMO dramatically reduced the cost of working with outside consultants.)

Qualifications

We set forth below the Monitorship Team’s qualifications as they relate to the requirements delineated in the Request for Proposals (“RFP”). The Monitorship Team’s unparalleled breadth of experience as monitors and monitorship team members, former prosecutors, law enforcement personnel, and data analytics specialists renders the team uniquely well-equipped to accomplish the specific requirements outlined in the RFP.

Policing and Law Enforcement Practices

The proposed Monitorship Team has extensive experience in policing and law enforcement practices.

Dr. Long is a law enforcement veteran with vast experience in policing and law enforcement practices. Before entering the private sector, Dr. Long completed a distinguished 21-year career with the New York City Police Department, retiring in 2002. He served as the Commanding Officer of the NYPD Academy for three years, where he was responsible for the training of thousands of recruits and in-service training for officers, investigators and executives at the NYPD. He also held leadership posts in the NYPD’s Office of Community Affairs, School Safety Division, and in more than 17 precinct commands in New York City.
Dr. Long has a lengthy history of providing feedback, technical assistance, training, and guidance to law enforcement agencies, including use of force, crisis intervention, impartial policing, community engagement, and police-youth interactions. He also would bring to the monitorship his experience as an operational specialist in crime control strategies, organizational structure, police training, and policy reforms. His investigative expertise includes conducting interviews and field audits as well as evaluating law enforcement practices, such as those involving community policing, de-escalation techniques, and crisis intervention.

Dr. Long presently provides training and technical assistance to members of the International City/County Management Association (ICMA), an association of local government administrators and managers through its affiliated Center for Public Safety Management. In that role, he conducts comprehensive assessments of and provides recommendations to a variety of municipal police departments across the United States.

Having served as the chief law enforcement official in multiple police departments, Mr. Larrabee has extensive experience in drafting and reviewing policies, procedures, manuals, directives, and training programs related to law enforcement practices. At each police department he led, Mr. Larrabee oversaw implementation of best practices, as well as the drafting of policies best suited to those practices. He ensured that policies reflected not only internal feedback, but also feedback from multiple stakeholders, including the communities served by those police departments, as well as academia. Mr. Larrabee also oversaw training designed for the implementation of revised practices. This training included not only sworn officers, but also civilian employees and executives. Mr. Larrabee has experience with reviewing law enforcement practices for all facets of policing, including but not limited to community policing and engagement, use of force and force investigations, crisis intervention and de-escalation techniques, impartial policing, intake/investigation/adjudication of officer misconduct complaints, civilian oversight, and police-youth interactions. Notably, Mr. Larrabee worked to revise the East Haven Police Department’s practices, including those specified above, within the context of a federal Consent Decree.

Following his retirement from law enforcement, Mr. Larrabee spent years working as a consultant to law enforcement agencies domestically and internationally, and has provided technical assistance and advisory services to multiple police departments. He was also engaged by the U.S. Department of Justice to provide technical assistance in Nigeria, where his work included improving relations between the community and the Nigerian Police Force.

Dr. Rasor-Cordero has significant experience in providing project management and technical assistance to law enforcement agencies, and has an extensive background as an educator and trainer. She completed a 25-year career in law enforcement with the Sheriff’s Office in Pinellas County, Florida. Pinellas County, with a population of approximately one million, encompasses the metropolitan areas of St. Petersburg, Clearwater, and Largo. While serving as the Commander of the Community Services Division, she established the Citizen’s Community Policing Institute, the Domestic Violence Unit, and the first Sexual Predator and Offender Unit in the
State of Florida. She served as the agency’s training advisor and played a significant role in transforming the Pinellas County Police Academy from a vocational program to a progressive program at St. Petersburg College.

She has served as a consultant to the U.S. Department of Justice’s Office of Community Oriented Policing Services. She also evaluated the training needs of the Atlanta Police Department’s Narcotics Unit for the U.S. Department of Justice Bureau of Justice Assistance. She, in addition to Dr. Long, currently provides performance management technical assistance for law enforcement agencies throughout the United States in her role as a Senior Research Associate with the Center for Public Safety Management based in Washington, D.C. She designed a three-part series for implementing, managing and evaluating community policing for the Florida Regional Community Policing Institute and delivered the training throughout Florida to mid- and executive-level leaders. She has evaluated and developed general orders and policy manuals for a multitude of law enforcement agencies, and has developed and delivered training in firearms, defensive tactics and driving.

During Ms. Lemire’s tenure as Counsel to the Police Commissioner at the NYPD, she reviewed, revised, and oversaw the implementation of a variety of trainings, including those addressing the constitutionality of street-level interactions between police officers and civilians, court testimony and perjury, and treatment of transgender arrestees. Ms. Lemire led an initiative to retrain officers responsible for patrolling public housing developments, and drafted this training to focus on significantly improving street-level interactions between the NYPD and civilians on public housing property. The NYPD required thousands of police officers to participate in this training, which addressed the proper legal basis for stopping, questioning, and arresting civilians. Ms. Lemire also drafted sensitivity training for police officers interacting with victims of sex crimes and domestic violence. The NYPD provided this training to thousands of police officers and investigators.

As an FBI supervisor, Mr. Burroughs, oversaw FBI deployments in sensitive investigative operations. In doing so, he provide operational guidance and best practices to ensure safety for federal law enforcement agents in the course of those deployments. As a squad supervisor, Mr. Burroughs was responsible for reviewing policies and procedures, and ensuring compliance with those policies and procedures by the FBI agents he oversaw.

As a lead case agent on large-scale gang investigations, Mr. Burroughs was responsible for reviewing policies and procedures and incorporating them into Operations Orders that were disseminated to FBI management as well as all participating arrest teams and/or search teams. Prior to the execution of these orders, Mr. Burroughs would review policies and procedures with all team leaders to ensure that every team was clearly aware of the policies and procedures governing their conduct to include specific review of the FBI’s policy in regards to the use of deadly force.

Monitoring

As demonstrated above, the Monitorship Team has extensive experience organizing and successfully implementing monitorships. Ms. Lemire, has led and served on several monitorships, all of which have involved overseeing the performance of other organizations. Ms. Lemire also serves on the federal monitorship of the District Council of New York City (the “Carpenters Union”) as ordered pursuant to a federal consent decree in the aftermath of indictments of the union’s leaders in the Southern District of New York. The Carpenters Union is the largest construction union in New York City, with more than 20,000 members. In that capacity, Ms. Lemire has directed compliance reviews, including reviews of internal disciplinary processes, investigations into corruption allegations, responses to corruption “hotline” calls, evaluations of hiring practices, reviews of the union’s inspector general, and financial audits.

Ms. Lemire has also been appointed as the monitor by several New York City agencies in connection with abuse, waste, and fraud. These appointments include appointments by the New York City Housing Development Corporation, the New York City Department of Housing Preservation and Development, and the New York City Department of Investigation. These monitorships focused on a variety of subject matters, including labor conditions on construction sites, procurement fraud, and organized crime involvement. Recently, Ms. Lemire served as the Independent Consultant appointed by the U.S. Securities and Exchange Commission and the Port Authority of New York and New Jersey to review compliance with municipal bond disclosure requirements pursuant to a federal consent decree. Ms. Lemire also led forensic accounting work on the monitorship of a Swiss Bank pursuant to a consent decree with the New York State Department of Financial Services.

Dr. Long currently serves on the federal monitoring team, established in 2013, to oversee the NYPD’s compliance and court-ordered reforms relating to stop, question, and frisk and trespass enforcement in public housing and privately-owned apartment buildings enrolled in the NYPD’s Trespass Affidavit Program. Dr. Long also assisted the Virgin Islands Police Department in complying with a federal consent decree, specifically to develop lesson plans and personnel training programs relating to the use of force. Dr. Long presently provides training and technical assistance to members of the International City/County Management Association (ICMA), an association of local government administrators and managers through its affiliated Center for Public Safety Management. In that role, he conducts comprehensive assessments of and provides recommendations to a variety of municipal police departments across the United States.

In 2013, Mr. Larrabee was chosen to lead the East Haven Police Department while the Department was under federal investigation for civil rights violations, and to ensure that the Department provided constitutional policing to the local community. Mr. Larrabee oversaw compliance with the resulting Consent Decree and the subsequent revision of all policies and procedures as well as the training on these new policies. Under his guidance, the East Haven Police Department successfully accomplished the goals of the Consent Decree in a timely manner, and the U.S. Department of Justice lauded him for this achievement. In the 1990s, Mr.
Larrabee served as the monitor of a Massachusetts police department. In that role he evaluated the effectiveness of a long-serving police chief, and assessed all operations of the department.

Mr. Burroughs has served as the Lead Investigator in a monitorship instituted pursuant to a federal consent decree. In this role, Mr. Burroughs oversaw compliance of the Carpenters Union, a 20,000-member labor union. Mr. Burroughs also served as the Lead Investigator on the New York City monitorship of a large waste-hauling company with annual revenues exceeding $100 million. The monitorship was ordered pursuant to an agreement between the monitored company and municipal industry regulators. In addition, Mr. Burroughs held a supervisory role in the monitorship of a Swiss bank charged by the U.S. Department of Justice with assisting U.S. citizens in tax evasion.

Mr. Costa has served on multiple monitorships in a broad array of subject matters, including data analytics, transaction monitoring, and trade surveillance. In the course of these monitorships, he has assessed the design and operating effectiveness of several platforms and related areas of operations, including data review, trader behavior, e-communication monitoring, and name list screening and transaction monitoring. Additionally, Mr. Costa has assessed remediation strategies for technology infrastructure, information systems, and data management and storage systems. Mr. Costa’s expertise will allow him to provide and implement best practices in connection with the City’s collection, analysis, and management of data, as well as assist in conducting surveys and collect data in the course of compliance audits.

Communication

In the course of monitorships and investigations, Ms. Lemire regularly drafts reports, summarizing oversight mechanisms and advising clients regarding the implementation and testing of compliance programs, procedures, and internal operations.

Each member of our proposed Monitorship Team is adept at report writing, having written sensitive reports for multiple monitorships, internal investigations, and academic publications. Our team understands that our reports will be addressed to multiple stakeholders, as well as made available to the public, and we will ensure that our reports are comprehensively drafted and fully developed. Monitorship Team members also have experience in communicating with diverse communities and in gathering community feedback.

As the top executive in multiple police departments, Mr. Larrabee regularly sought community feedback through the use of community meetings and surveys. Likewise, he oversaw the implementation of policies requiring police officers and supervisors to engage with the communities they served, including the scheduling of community meetings in the specific neighborhoods patrolled. Mr. Larrabee also established and supported other programs aimed at enhancing community engagement, including: police substations in public housing developments, prisoner re-entry programs, juvenile diversion programs, partnerships with schools, surveys of arrestees to gain feedback regarding their custodial treatment, gun buy-back programs, studies to assist children victimized by domestic abuse, training partnerships with the NAACP and the U.S. Department of
Justice, police chaplains’ programs, and advisory groups comprised of local businesses, youth, and religious leaders.

Mr. Larrabee routinely prepared complex public reports for dissemination to disparate audiences and communicated with diverse constituencies. These reports included position papers to be presented to public bodies, including legislatures and appointed commissions, and made available to the public in the communities where Mr. Larrabee worked. He also routinely oversaw the issuance of press releases and addressed the public through media appearances.

Working within the NYPD for 21 years in a multitude of ranks and commands, including as a senior commander in the NYPD’s Office of Community Affairs, as well as serving as the First Deputy Commissioner/Undersheriff of the Westchester County Department of Public Safety-Division of County Police, and leading the public safety efforts on Columbia University’s diverse Morningside campus which housed thousands of international students, Dr. Long is well-versed in communications with diverse communities.

Dr. Rasor Cordero also has extensive communication skills and abilities to communicate with diverse constituencies. She has created and delivered presentations to municipal leadership and community stakeholders and has conducted focus groups with diverse populations. Additionally, she has written detailed reports, developed curriculum, and delivered numerous presentations to many audiences.

**Demonstrated Ability to Collaborate with Government Entities, the City, CPD, and the State**

In the course of her career, Ms. Lemire has worked closely with government agencies in policing issues. While serving as Counsel to the Police Commissioner, Ms. Lemire regularly met with the New York City Civilian Complaint Review Board and the Mayor’s Commission to Combat Police Corruption, and a multitude of other government agencies, including New York City’s Law Department, as well as District Attorneys and their staffs. She also served as the Police Commissioner’s lead representative in working with New York City advocates representing the interests of domestic violence and sexual assault victims, and with members of the LGBT community.

Mr. Larrabee has extensive experience in working closely with multiple government agencies. As the chief of multiple police departments, he was worked with local legislatures, elected officials, civilian oversight bodies, schools, mental health providers, and other governmental agencies. In the course of his career, he has been involved in collective bargaining in various roles, including as union president and as a member of the union’s bargaining team. As a Police Chief, he regularly engaged in contract negotiations with collective bargaining units, and also participated in arbitration, mediation, and grievance hearings.

Throughout his 25-year career with the FBI, Mr. Burroughs worked collaboratively with various municipal, state, and federal agencies on large-scale law enforcement matters. For example, when investigating violent gang matters, Mr. Burroughs sought out and partnered with local law enforcement, forming numerous “ad hoc task
forces” to not only combine resources, but to work with local police. In forming these partnerships, the FBI was better able to reach out to communities impacted by gang activity.

**Law and Civil Rights**

The Monitoring Team has deep and varied experience in law enforcement with constitutional and other legal requirements, as well as mediation and dispute resolution, and possesses court-related skills. As a federal and local prosecutor, **Ms. Lemire** regularly assessed legal sufficiency and compliance with constitutional law, federal law, and local laws. At the NYPD, Ms. Lemire participated in the creation of a mediation and alternative dispute resolution program designed to address low-level quality-of-life crimes in Brooklyn, New York. As a career prosecutor, she is well-versed in courtroom practices and related skills.

**Dr. Long**, in the course of his 21-year career at the NYPD including as the Commanding Office of the Police Academy, has deep knowledge and experience with regard to constitutional policing. As the Commanding Officer of the Police Academy, Dr. Long was responsible for the training of recruits and in-service training of managers and executives. This training included coursework in legal policing requirements, and civil rights protections. Through his work on the NYPD and the Virgin Islands monitorships, Dr. Long, has increased his expertise in these areas, working toward compliance with the monitorships’ consent decrees.

Through his high-level work in police departments, **Mr. Larrabee** is familiar with law enforcement compliance with constitutional and other legal requirements. He served as the first Civil Rights Officer in the Framingham Police Department. He gained additional familiarity and expertise in policing through his direct experience in directing the overhaul of the East Haven Police Departments policies and practices to comply with a federal Consent Decree. As a former law enforcement officer, he is experienced in court testimony.

Given her strong training background, **Dr. Rasor-Cordero** is well-acquainted with the legal requirements of constitutional policing.

As a federal law enforcement agent, **Mr. Burroughs** is well-versed in constitutional policing and federal laws governing law enforcement work. He has testified before the grand jury and at trials on numerous occasions in criminal prosecutions.

**Experience Working with Various Constituencies**

Working within the NYPD for 21 years and serving in a multitude of ranks and commands, including as a senior commander in the NYPD’s Office of Community Affairs, **Dr. Long** has worked extensively with the diverse populations of a large city.

As we detail elsewhere in this Proposal, as a former police chief, **Mr. Larrabee** has extensive experience collaborating with community stakeholders and forming strategic partnerships to address how police departments respond to a variety of issues in diverse communities. Through these strategic partnerships, Mr.
Larrabee has worked with youth advisory groups, advocacy groups, religious groups, mental health providers, and the NAACP. He also oversaw the improvement of police relations with populations with limited English proficiencies. He has developed community policing initiatives, with emphases on youth and schools, domestic abuse, narcotics abuse, and increased citizen participation in policing. His work for the U.S. Department of Justice to provide technical assistance in Nigeria included improving relations between the community and the Nigerian Police Force. While leading police departments, he has conducted community-wide citizen surveys.

Ms. Lemire’s work at the NYPD included engaging with diverse community stakeholders. In particular, she chaired a working group focused on addressing police treatment of transgender persons, working with representatives from the transgender and other LGBT communities in New York City. Ms. Lemire was also charged with implementing improved processes to the NYPD’s “U-Visa” program, which provides crime victims with a means to establish their legal status in the United States. The majority of these immigrants had limited English skills and immigrated from Central and South America.

As the lead case agent on numerous complex violent gang investigations, Mr. Burroughs embraced the need to effectively engage community members along with local, state, and federal law enforcement agencies. Mr. Burroughs served as the lead case agent on several successful investigative matters which utilized the U.S. Department of Justice program Operation Weed and Seed, which brought together local, state, and federal crime-fighting agencies, social service providers, community groups, local business owners, prosecutors, and neighborhood residents under the shared goal of reducing violent crime and gang activity while boosting social services and economic revitalization.

Dr. Rasor-Cordero has experience working with diverse populations not only as a veteran law enforcement professional, but also as a professor in academia. As Commander of the Community Services Division, Dr. Rasor-Cordero worked with diverse community stakeholders to address community concerns. As a college professor, she interacts with domestic and international students.

Knowledge of Chicago Communities

If the Monitorship Team is chosen, we expeditiously will seek to add to our core team a Community Liaison – a member of the Chicago community with deep familiarity and understanding of issues and conditions particular to Chicago and its diverse communities. Given the importance of this role and the need for stakeholder buy-in, we will thoroughly vet this individual with community stakeholders and the Parties before adding this person to the Monitorship Team.

While not obviating the need for a Community Liaison, the Monitorship Team does have ties to Chicago: Mr. Costa is a lifelong resident of the Chicago metropolitan area and currently resides in Chicago, where he works at StoneTurn’s Chicago office. Mr. Costa also obtained his MBA from the Chicago campus of the Kellogg School of Management and Ms. Lemire obtained her law degree from the Northwestern University School of Law in Chicago. StoneTurn opened its Chicago office in 2008.
Project and Change Management: Completing Projects within Deadlines and Budgets

While serving as Counsel to the Police Commissioner at the NYPD, Ms. Lemire oversaw a far-reaching re-engineering project that addressed operations and infrastructure, including staffing, information technology, crime auditing and accountability (CompStat), and counterterrorism programs. The project was conducted in conjunction with McKinsey & Co. and involved the evaluation, development, and implementation of process for supervisors and managers to oversee accountability in the NYPD. In the course of this project, Ms. Lemire was regularly involved in evaluating organizational changes and related policy reforms. The project utilized multiple means to gather information and assess the progress of instituted changes, including interviews of NYPD personnel, surveys, focus groups, and data reviews.

In the course of her work in the monitorship of the Carpenters Union, Ms. Lemire has evaluated processes for supervisors and managers to oversee accountability in this 20,000-member union. More specifically, she has led the assessment of the union’s Office of the Inspector General, and the ability of the Inspector General and his senior team to investigate corruption and misconduct within the union. Ms. Lemire also led a review of the union’s internal disciplinary mechanisms, drafting a report which summarized findings and making recommendations to improve internal processes. In both reviews, Ms. Lemire evaluated accountability of supervisors and managers.

In the course of her involvement in several complex multi-year monitorships, Ms. Lemire is accustomed to completing projects within anticipated deadlines and budgets, and is attuned to the fiscal scrutiny to which monitorships are typically subjected.

Dr. Rasor-Cordero has evaluated and worked with numerous police departments throughout the United States in enhancing operational performance through strategic organizational change. She is adept at assessing the organizational structure of law enforcement agencies, practices and procedures, training of personnel, barriers to organizational change, funding capability, and strategic planning.

In his work on two federal monitorships and working with municipal police departments across the United States, Dr. Long has expertise in evaluating organizational and institutional change, and developing effective quality improvement practices. Likewise, he is well-versed in evaluating, developing, and implementing processes for supervisors and managers to oversee accountability in a variety of municipal law enforcement agencies.

Three of the police departments led by Mr. Larrabee underwent substantial organizational reform and cultural changes under his tenure. These reorganizations were the result of effective quality improvement practices and reflected the implementation of increased accountability among police managers and executives. To measure the progress of reforms, Mr. Larrabee oversaw the application of analyses to assess progress and outcomes.
As mentioned above, Mr. Burroughs was the Lead Investigator in support of the monitorship of the Carpenters Union. In that role, he led, with Ms. Lemire, the team reviewing the union’s Office of the Inspector General. The review included qualitative and quantitative analyses of case outcomes, as well as recommendations for improvements to the Inspector General’s infrastructure and practices. The policies and procedures of the office were assessed and changes implemented to improve efficiency and accountability within the union’s Office of the Inspector General.

**Budgeting**

Throughout the course of his career, Mr. Larrabee has been involved in developing and overseeing police department budgets. He was responsible not only for drafting budgets, and ensuring that sufficient data supported the budgets, but also presenting to public bodies including legislatures and appointed commissions.

StoneTurn executives have experience in the public sector budgeting process. For example, StoneTurn Chairman Simon Platt was the Senior Manager on the Commonwealth of Massachusetts audit, the first independent audits of the state, from 1987 to 1990, where he led the teams auditing the Comptroller’s and Treasurer’s Offices. The Comptroller’s Office is part of the Administration, and is responsible for the accounting for all of the Commonwealth transactions. In this role, the Comptroller’s Office manages the budgeting processes, implements the budget enacted by the Legislature, manages spending against the appropriations through allocations, and records all budgetary, special purpose, capital and trust account transactions.

**Data Analysis and Information Technology**

Mr. Costa would lead the Data Analysis and Information Technology aspects of the CPD monitorship. He brings extensive expertise in this regard, having served as a Team Leader on one of StoneTurn’s monitorship projects in which he oversees data analytics. In this role, he assessed the design and operating effectiveness of several data platforms and related areas of operations. Additionally, Mr. Costa has assessed remediation strategies for technology infrastructure, information systems, and data management and storage systems.

Mr. Costa has experience working with government entities including the City of Naperville in Illinois and the City of Dallas in Texas in a wide variety of subject matters. Working with the City of Dallas, Mr. Costa led a Tax Increment Financing (TIF) application submission for a historical remediation project eligible for $20.6 million in incentives from the city. The City of Dallas awarded the project the full amount of incentives and granted the site a landmark status. Additionally, Mr. Costa worked with the City of Naperville to update their geographic information systems (GIS) by building an application that allows users to interface with underlying database structures. More than 10 years later, the city still uses this application to identify the location of resident-generated requests and complaints.
Ms. Lemire served on the NYPD Police Commissioner’s Information Technology Committee, which oversaw the implementation of key information technology initiatives. These initiatives included the centralization and increased accessibility of crime data for use by officers in the field. The committee also addressed the implementation of new databases and other information technology systems aimed at upgrading and replacing antiquated legacy systems.

Also, as referenced above, while serving as Counsel to the Police Commissioner at the NYPD, Ms. Lemire oversaw a re-engineering project which addressed operations and infrastructure, including staffing, information technology, crime auditing and accountability (CompStat), and counterterrorism programs. The project was conducted in conjunction with McKinsey & Co. and involved the evaluation, development, and implementation of processes for supervisors and managers to oversee accountability in the NYPD. The project utilized multiple methods to gather data and conduct quantitative and qualitative assessments, including interviews, surveys, and focus groups.

In the course of Mr. Larrabee’s career, he has relied on data analysis to buttress policing strategies. He has extensive experience designing and implementing effective benchmarks to assess police practices, including civilian interactions and enforcement.

Furthermore, in the course of multiple monitorships, internal fraud investigations, and due diligence work conducted by Lemire LLC, Ms. Lemire has overseen projects which require extensive data acquisition and management, including forensic accounting reviews, reviews of digital evidence in the course of a regulatory monitorship, cyber forensic reviews completed during internal fraud investigations, and bank account data reviews conducted in the course of a bank monitorship.
Prior Experience and References

The following is a list of references for experiences for members of the team relevant to the monitoring duties and responsibilities. Details regarding these prior experiences are provided in the Qualifications section of this Proposal.

Katherine Lemire
Raymond W. Kelly, President
Guardian Group
745 Fifth Avenue
New York, NY 10022
rkelly@guardiangroup745@gmail.com
(212) 239-1816
(reference for the NYPD; Mr. Kelly served as Police Commissioner)

Glen G. McGorty
Partner, Crowell & Moring
590 Madison Avenue, 20th Floor,
New York, NY 10022-2544
gmcgorty@crowell.com
(212) 895-4246
(reference for the monitorship of the Carpenters Union; Mr. McGorty is the appointed Monitor)

Osman Nawaz, Assistant Director
U.S. Securities and Exchange Commission
200 Vesey Street, Suite 400
New York, NY 10281
nawazo@sec.gov
(212) 336-0169
(reference for the appointment as Independent Consultant to the Port Authority of New York & New Jersey)

Demosthenes Long
Thomas Belfiore
Chief Security Officer, Westchester Medical Center Health
100 Woods Road
Room C347b
Valhalla, NY 10595
thomas.belfiore@wmchealth.org
(914) 493.8614
(reference for the Westchester County Department of Public Safety -- Division of County Police; Mr. Belfiore served as the Police Commissioner)

Peter L. Zimroth
Director of the Center on Civil Justice, NYU School of Law
139 MacDougal Street, Room 606
New York, NY 20012
peter.zimroth@nyu.edu
(212) 998-6622
(reference for the NYPD monitorship; Mr. Zimroth is the appointed Monitor)
**Brent Larrabee**  
Honorable Joseph Maturo, Jr.  
Mayor, East Haven (Connecticut)  
250 Main Street  
East Haven, CT 06512  
(203) 468-3204  
eh.mayor@att.net  
(reference for the East Haven Police Department)

**John Hughes**  
Chief, Civil Division  
U.S. Attorney's Office  
District of Connecticut  
157 Church Street  
P.O. Box 1824  
New Haven, CT 06508  
(203) 821-3802  
john.hughes@usdoj.gov  
(reference for the East Haven Police Department monitorship)

**William Callion**  
Director of Public Safety (retired)  
City of Stamford  
35 West Broad St.  
Stamford, CT 06902  
203-667-7280  
wcallion@gmail.com  
(reference for the East Haven Police Department monitorship)

**John Stefanini**  
(former) Selectman  
City of Framingham (now city)  
100 Bethany Rd.  
Framingham, MA 01702  
(508) 878-2220  
stefanini143@gmail.com

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**Michael Costa**  
Michael Tregoning  
Chief Financial Officer, Headington Companies  
2711 N Haskell Ave # 2800,  
Dallas, TX 75204  
michaelt@headington.com  
(214) 696-0606  
(reference for the City of Dallas work)

**Kathy Rendek**  
Technology Project Manager at City of Naperville  
400 S. Eagle Street  
Naperville, IL 60540  
rendekka@gmail.com  
(630) 420-6111  
(reference for the City of Naperville work)

**David Burroughs**  
David Shafer  
Head of Global Security  
NASDAQ  
One Liberty Plaza  
165 Broadway  
New York, NY 10006  
(212) 401-8717  
david.shafer@nasdaq.com  
(reference for the FBI)
Potential Conflicts of Interest or Bias

In an excess of caution, we disclose the following: two relatives of a StoneTurn employee are presently employed as police officers in the Chicago Police Department. This StoneTurn employee is not a member of the Monitorship Team, and we do not anticipate that he will provide assistance to the Monitorship Team.

Proposed Activities and Methodology

Our proposed activities would mirror those required by the Consent Decree, including the following:

- review all policies and procedures required by the Consent Decree;
- review implementation plans and training materials including:
  - training governing the role of police officers in schools;
  - initial and in-servicing training plans drafted by the Deputy Inspector General for Public Safety;
  - the Crisis Intervention Plan and the CIT Implementation plan;
  - the Training Plan for CPD’s recruit, field, in-service, and pre-service promotional training;
  - the plan regarding unity of command and span of control;
  - recruitment, hiring, and promotional plans;
  - the Officer Support Systems Plan;
  - the Equipment and Technology Audit Response Plan;
  - training plans for COPA, the Deputy PSiG, and BIA;
- conduct compliance reviews and audits to determine whether the City and the CPD have complied with the Consent Decree, and whether CPD is enforcing policies, procedures, orders and directives implemented to comply with the Consent Decree;
- conduct community surveys approximately every two years to assess perceptions of and satisfaction with the CPD, and publish results;
- draft annual comprehensive monitoring plans;
- provide technical assistance if warranted and make recommendations for fulfillment of the requirements of the Consent Decree;
- conduct a comprehensive assessment approximately three years after the date of the Consent Decree, addressing up-to-date compliance and progress with the requirements of the Consent Decree, as well as outcomes and the possible need for modifications to the Consent Decree;
- file written public reports semiannually addressing the status of compliance with the agreement, and publish the reports to the public;
- meet quarterly, at a minimum, with the broad-based community coalition referenced in the Consent Decree;
- convene public meetings to explain the Monitor’s reports and progress to date, and provide an opportunity for the public to voice perspectives on police interactions; and
- initiate meetings with other stakeholders, including members of the CPD and their collective bargaining representatives

We would closely adhere to the scope of the Monitor’s duties as outlined in the Consent Decree. If during the course of the monitorship, the City meets the taskings and broader goals mandated by Consent Decree, the Monitorship Team will decrease its participation if warranted. This decreased role over the time will serve two purposes: (1) appropriately adjusting the total costs of the monitorship and (2) ensuring that the City is able to achieve not only the goals of the Consent Decree but also institute a culture of reforms which will extend beyond the life of the Consent Decree.

We understand that the Parties are particularly mindful of the potential monetary costs of this monitorship. To that end, we would strive to utilize our less costly staff as much as possible. Moreover, we will seek to utilize personnel, including subject matter experts and administrative assistants, employed by the City and the CPD in order to contain costs. Furthermore, we will rely upon staff in StoneTurn’s Chicago office to reduce travel costs. The Monitorship Team is accustomed to working within budgets on long-term projects, and would exercise great care in adhering to budgetary limits imposed by the parties.

With regard to personnel responsible for the various activities to be conducted and the number of hours anticipated to be devoted to specific aspects of the project, including the number of hours spent in Chicago, please refer to the cost estimates attached as Appendix B. We would strive to complete our work in a cost-efficient manner, and therefore we will remain flexible with regard to allocations of hours.
Cost Estimates

We have enclosed a detailed set of cost estimates in Appendix B. Although we do not expect costs to exceed the City’s proposed limit of $2.85 million, our estimated annual costs range from $1,666,220 in the first year of the Monitorship, to $922,385 in the fifth year. We expect one-time costs for construction of the Monitorship Team’s website, which we estimate as costing $12,000.
Katherine A. Lemire, a Partner with StoneTurn, has more than 20 years of experience advising public and private sector clients on a broad range of compliance and integrity issues, complex investigations, corruption, anti-money laundering, fraud and risk matters. She joined StoneTurn in 2018 after successfully operating Lemire LLC, a New York-based certified woman-owned business enterprise (WBE) specializing in compliance, risk and investigative matters, which she founded in 2013. The two companies merged in 2018.

Katherine has extensive oversight and regulatory experience in supervising large public sector projects and monitorships. Recently, she served as Independent Consultant to the Port Authority of New York and New Jersey (PANYNJ) regarding municipal bond disclosure requirements resulting from a U.S. Securities and Exchange Commission (SEC) Consent Decree. Notably, for three years she led the forensic accounting and investigative team of a Swiss bank monitorship under assignment from the New York State Department of Financial Services (DFS). She is currently overseeing compliance reviews for one of the largest construction unions in the United States under a monitorship imposed by a federal judge relating to allegations of racketeering, bribery and related crimes. She is also currently serving as a court-appointed Special Master in the U.S. District Court in the Southern District of New York. In that role, Katherine is responsible for the custody and sale of valuable artwork seized from a foreign dictator’s U.S. residence.

Education
J.D., Northwestern University School of Law
New York University School of Law
B. A., Brown University

Practice Areas
Compliance & Monitoring
Investigations
Anti-Corruption
Anti-Money Laundering
Sexual Misconduct
Due Diligence
Construction Integrity
Katherine previously supervised investigative and audit teams to conduct compliance reviews on behalf of three New York City agencies. For the New York City Department of Housing Preservation and Development, Katherine and her team provided labor compliance oversight of a low-income housing residential construction site. For the New York City Business Integrity Commission, she supervised an extensive financial and operational review of a large waste-hauling company for suspected ties to organized crime. The New York City Department of Education hired Katherine to conduct due diligence on potential pre-kindergarten vendors in connection with New York City’s Universal Pre-K initiative. At the state level, on behalf of the New York State Governor’s Office of Storm Recovery (GOSR), Katherine provided auditing reviews of federal fund expenditures relating to recovery efforts of Superstorm Sandy and other natural disasters.

For her private sector clients, Katherine brings her knowledge of law enforcement best practices and her supervisory, investigative and oversight skills to tackle corporate malfeasance, money laundering schemes, sexual misconduct in the workplace, cyber fraud, employee theft and corruption. Her proactive engagements in the financial, construction, digital media, real estate, consumer products and energy sectors include thorough due diligence and compliance reviews.

Prior to joining StoneTurn, Katherine founded and managed Lemire LLC, a compliance and risk consulting firm, which was one of the few certified WBE in the sector. The firm grew under her leadership and Katherine managed multiple federal, state and local monitorships while serving as its Chief Executive Officer.

Previously, Katherine served as the Counsel to the Police Commissioner for the New York City Police Department (NYPD) for four years. In this role, she managed a broad portfolio of operational, legal and managerial matters for an agency with more than 50,000 employees. As the principal advisor to Police Commissioner Raymond W. Kelly, she drafted policies and supervised training on a variety of issues, including search and seizure, evidence preservation and witness sensitivity. She led a re-engineering project, in conjunction with McKinsey & Co., addressing NYPD operations and infrastructure. Among other responsibilities, she oversaw the extensive review of NYPD’s handling of domestic violence and sex crimes cases resulting in significant operational changes impacting more than 250,000 police responses annually.

Katherine served as an Assistant United States Attorney in the U.S. Attorney’s Office for the Southern District of New York for seven years. She successfully prosecuted violent gangs engaged in murder, racketeering and narcotics-trafficking. While at the U.S. Attorney’s Office, she investigated numerous complex federal criminal cases involving bribery, money laundering and procurement fraud, one of which involved high-level members of the U.S. military. During her seven-year tenure at the U.S. Attorney’s Office, Katherine led numerous additional investigations involving racketeering, public corruption and fraud that were successfully prosecuted. Notably, she was lead counsel on a case involving a nationwide Ponzi scheme perpetrator who was convicted for bundling campaign contributions (United States v. Hsu).

Katherine began her legal career as an Assistant District Attorney in the New York County District Attorney’s Office serving at the Office for five years. As an Assistant DA, she gained experience in investigating and prosecuting cases from grand jury proceedings through trial on a broad range of matters such as forgery, robbery and bank fraud. She was a member of the Sex Crimes Unit.
Katherine A. Lemire, J.D.

Katherine is a frequent speaker and panelist at industry events on internal investigations, monitorships and regulatory reviews. She has written on issues ranging including sexual harassment, cyber security and compliance. Katherine is a Certified Anti-Money Laundering Specialist, Association of Certified Anti-Money Laundering Specialists (ACAMS). She is fluent in French and conversant in Spanish and German.

Katherine is the recipient of the following awards recognizing her contributions:

- Above & Beyond Award for Outstanding Women in Business, presented by City & State NY (2017)
- New York Federal Executive Board Award, presented by Attorney General Michael Mukasey (2008)

PREVIOUS EXPERIENCE

- Lemire LLC, 2013-2018
- New York City Police Department, 2009-2013
- New York County District Attorney’s Office, 1997-2002

PROFESSIONAL AFFILIATIONS / OTHER

- Member, American Bar Association
- Member, Federal Bar Council
- Member, New York State Bar Association
- Member, New York City Bar Association
- Member, Women’s White Collar Defense Association (New York Chapter)
- Certified Anti-Money Laundering Specialist, Association of Certified Anti-Money Laundering Specialists (ACAMS)

PUBLICATIONS/POSTS

- Conducting a Sexual Harassment Investigation: A Practical Guide, American Bar Association Guide for Corporate Counsel (October 2018) [planned publication date]
- When a Monitor Arrives at Your Firm: What is Expected of You?, Compliance & Ethics Professional, (September 2018) [planned publication date]
- Interview with Jody Godoy (Weinstein Probe), Law 360 (March 2018)
• New Prohibitions on Workplace Discrimination, Lemire LLC Blog (March 2018)
• Promoting a Workplace Free of Sexual Harassment, Lemire LLC Blog (January 2018)
• Cybersecurity Remains an Industry Priority, Katherine Lemire interview, The Secured Lender (November 2017)
• Correspondent Banking: A Gateway to Money Laundering Requires Heightened Scrutiny, co-author with Caroline A. Fornos, National Law Journal (September 2016)
• Terrorist Attacks Heighten Focus on Bank Regulations, Lemire LLC Blog (December 2015)

PRESENTATIONS

• “Obstruction of Justice,” panel member, Federal Bar Council, 2018 Fall Bench & Bar Retreat, October 19-21, 2018 [planned]
• “Women in Investigations,” Global Investigations Review (GIR), London, June 28, 2018
• “Handling Government Investigations and Crisis Management,” panel member, New York State Bar Association, November 2, 2017
• “Women in Law,” panel member, Northwestern School of Law, September 28, 2017
• “Construction Industry Investigations & Prosecutions,” panel member, New York City Bar, February 24, 2015

SELECT PROFESSIONAL EXPERIENCE

• Serves as Special Investigative Counsel to the Erie County Legislature relating to allegations of the County’s former Commissioner of Social Services
• Serves on the Board of ETS Risk Management Inc.
• Served as the Chair of the Governance Committee, New York City Alliance Against Sexual Assault
• Conducted compliance review and oversight of a low-income housing residential construction site in northern Manhattan for the New York City Department of Housing Preservation and Development
• Conducted auditing services on behalf of the New York State Governor’s Office of Storm Recovery (GOSR) relating to federal fund expenditures for Superstorm Sandy and other natural disasters
• Reviewed legalities and arrest and detentions within public housing properties and drafted corrective policies and training for more than 3,000 police officers
• Represented Police Commissioner Kelly in meetings with community leaders and representatives and civilian oversight organizations
• Drafted policies and supervised training governing a variety of issues, including search and seizure, evidence preservation and witness sensitivity
• Oversaw extensive review of the NYPD’s handling of domestic violence and sex crimes cases
• Recruited and hired executive NYPD personnel, including multiple Deputy Commissioners
• Investigated and prosecuted numerous cases involving violent gangs, public corruption and racketeering
Demosthenes (Monte) M. Long has served in leadership roles in the public, private and education sectors for more than 35 years. As a law enforcement veteran, he brings his experience as an operational specialist in crime control strategies, organizational structure, police training, policy reforms, security risk management, compliance reviews and monitoring to organizations facing court-ordered mandates requiring leadership, management and operational training.

For private sector clients, his expertise relates to raising awareness of organizational, operational and support issues and improving personnel training and community engagement. His investigative work includes conducting interviews and field audits as well as evaluating law enforcement practices, such as those involving community policing, de-escalation techniques and crisis intervention.

Monte currently serves on the federal monitoring team, established in 2013, to oversee the New York Police Department’s (NYPD) compliance and court-ordered reforms relating to “stop, question, and frisk and trespass enforcement in public housing and private housing enrolled in the NYPD’s Trespass Affidavit Program,” a post to which he was appointed in 2017. He is a Senior Associate of the Center for Public Safety Management (CPSM), which provides public safety technical assistance and training for the membership of the International City/County Management Association (ICMA), a non-profit professional association of local government managers. Monte has worked with CPSM team members on seven comprehensive assessment projects of municipal police departments. From 2016 - 2017, Monte worked with T&M Protection Resources and assisted the Virgin Islands Police Department, which was

**Education**

- Ed.D, St. John Fisher College
- J.D., New York Law School
- M.A., John Jay College of Criminal Justice
- B.S., John Jay College of Criminal Justice
subject to a Federal court consent decree, to develop entry-level and in-service training lesson plans relating to the use of force training.

In 2011, Monte began teaching at Pace University as an Assistant Professor in the Department of Criminal Justice and Security. Monte left Pace University in 2013 to assume the position of Director of Operations in the Department of Public Safety at Columbia University, where he developed training programs, conducted compliance reviews and audits and collaborated with community members in developing protocols and procedures to improve security and safety on the Morningside Heights campus. Monte returned to Pace University in 2016 as a Clinical Professor.

In 2005, he was appointed the First Deputy Commissioner of the Westchester County Department of Public Safety, where he remained for five years, directing training and administering daily support functions. Previously, Monte worked as the Director of Corporate Security for one of the largest public utilities in the Northeast, responsible for over 200 facilities and more than 12,000 employees.

Before entering the private sector, Monte had a distinguished 30-year career with the New York Police Department retiring in 2002 as Assistant Chief. He served for more than seven years in the command level, executive level and other leadership positions with the NYPD. During this time, he was the Commanding Officer of the New York Police Academy for three years, responsible for the training of thousands of recruits and in-service training for officers, investigators and executives at the NYPD.

Monte earned his B.S., J.D. and Master’s degrees while also working at the NYPD. He completed a Doctorate in Education in 2012.

PREVIOUS EXPERIENCE

- Department of Criminal Justice and Security, Pace University, 2016-Present
- Department of Public Safety, Columbia University, 2014-2016
- Department of Criminal Justice and Security, Pace University, 2011-2013
- Westchester County Department of Public Safety, Division of County Police, 2005-2010
- KeySpan Corporation, 2002-2004
- New York Police Department, 1981-2002

PROFESSIONAL AFFILIATIONS / OTHER

- Police Executive Research Forum (PERF), Member
- Senior Associate, Center for Public Safety Management (CPSM)

StoneTurn.com
SELECT PROFESSIONAL EXPERIENCE

- Appointed to the Federal Monitoring Team for the NYPD
- Served on the compliance reform team of T&M Protection Resources at assist the Virgin Islands Police Department
- Served as Deputy Commissioner/Undersheriff Westchester County Public Safety Department
- Conducted oversight of the Civil Unit, Taxi and Limousine Commission and The Office of STOP-DWI
- Reviewed existing training protocols, developed and delivered leadership training and remedial training modules for the Public Safety staff of Columbia University
- Directed a $20 million capital project to enhance physical security at corporate facilities
- Served as Assistant Chief, NYPD
- Served as Commanding Officer, NYPD Police Academy
- Served as Commanding Officer, School Safety Division, NYPD
- Served as Commanding Officer, Office of Deputy Commissioner Community Affairs, NYPD
- Served as Executive Officer, Office of the First Deputy Commissioner, NYPD
- Served as Executive Officer, 47th Precinct, NYPD
- Served as Supervisor of Patrol in 17 Bronx Precincts, Transit Districts and Housing Police commands, NYPD
Brent B. Larrabee has served in leadership roles in the public, private and education sectors for more than 45 years. As a veteran law enforcement executive, he brings his experience in managing large, publicly-funded organizations with diverse workforces, an understanding of the stress and demands of policing and hands-on operational know-how to implement robust training programs to his assignments.

Brent has served as the Chief of Police on five city and town police forces in Connecticut and Massachusetts, including Stamford, Connecticut, which ranked 4th in safety nationwide during his tenure. His strategic managerial and negotiating expertise in dealing with community policing initiatives, improving procedures and training, diversification of the workforce, safety and security in schools, formation and expansion of community coalitions, and implementation of neighborhood policing has been well-documented.

Brent has extensive experience reviewing law enforcement regulations, police training standards, and implementing effective programs and policies. Most recently, he served successfully as the Interim Commissioner of the City of Cambridge Police Department in Massachusetts with the mandate to maintain order and morale in the diverse community while searching for a new chief. Earlier in his capacity as Chief of Police and Interim Chief of Police of the East Haven Police Department in Connecticut, Brent was cited by the U.S. Department of Justice for his accomplishments while under a federally-mandated Consent Decree for abuses of Hispanic citizens. In East Haven, he oversaw the complete revision of all police policies and procedures. He managed the adoption of new procedures and the recruitment and training of new personnel, replacing 50% of the police force that had departed. Earlier he worked with the Albany, New York and Marblehead, Massachusetts
Police Departments assessing their strengths and weaknesses and recommending new procedures.

For the City of Providence, Rhode Island Brent helped develop and implement a strategy and threat assessment for the Providence School Department and the Providence Police Department. Earlier, he worked for two Massachusetts communities. The Board of Selectmen of a township appointed Brent as Monitor to review policing strategies and the effectiveness of current leadership. For the City of Chelsea, bordering Boston, Brent worked with the Office of the Receiver/Administrator to assist the Police Department in restructuring operations and adopting community policing policies in its diverse urban community.

Significantly, Brent spent 14 years as the Chief of Police of the Framingham Massachusetts Police Department, having risen through the ranks as patrol officer, detective, sergeant and lieutenant. His indelible mark was the impact he made in increasing police respect among diverse groups of citizens. He developed a community policing initiative that focused on youth, schools, domestic abuse and narcotics. His retooling of the procedures and policies allowed for greater respect for the police in their community.

Brent’s work also includes due diligence, Advisory and investigative services. Between 1989 and 2009, Brent advised 10 towns and cities in Massachusetts and one in Connecticut on their selection of Chief of Police. In 2017, he was a member of the nationwide search committee to find a full-time Commissioner of Police for the City of Cambridge, where he was serving as its Interim Police Commissioner.

Brent received the following awards for his service:
- 2015 Distinguished Police Chief’s Award from the Police Commissioners Association of Connecticut
- 2008 Distinguished Police Chief’s Award from the Police Commissioners Association of Connecticut
- 1978 William Welch Medal of Honor, Framingham Police Department and Board of Selectmen

PREVIOUS EXPERIENCE

- Interim Commissioner, City of Cambridge Police Department, Cambridge, MA, 2017
- Chief of Police, East Haven Police Department, East Haven, CT, 2013-2016
- Interim Chief of Police, East Haven Police Department, East Haven, CT, 2012
- Guidepost Solutions, 2011
- Strategic Policy Partnership, 2010
- Chief of Police, Stamford Police Department, Stamford, CT, 2005-2010
- U.S. Department of Justice, International Criminal Investigative Training Assistance Program (ICITAP) Nigeria, 2004
- Interim Chief of Police, Town of Westwood, MA, 2003
- Independent Consultant on police matters 2002-2004
- Chief of Police, Framingham MA, 1987-2001
Brent B. Larrabee, MPA, B.S.  
Monitorship Team Member

• Framingham Police Department, Framingham, MA 1972-1987

PROFESSIONAL AFFILIATIONS / OTHER

• Massachusetts Chiefs of Police Association, Life Member
• Connecticut Police Chiefs Association, Life Member
• Florida Chiefs of Police Association, Active Member
• International Association of Chiefs of Police (IACP), Active Member
• Framingham Police Athletic League (PAL), President
• Police Executive Research Forum (PERF), Active Member
• Volunteer, North Naples Accountability Board, State of Florida Juvenile Justice program, 2002-2005

EXECUTIVE APPOINTMENTS AND ADVISER ROLES

• Board of Trustees, Framingham State College, Framingham, MA, 1996–2001
• Executive Office of the President, Office of National Drug Control Policy, Community Policing Working Group, Washington, DC, 1995
• Framingham State College, Framingham, MA; Presidential Search Committee, 1995

PRESENTATIONS

• First Predictive Policing Symposium, invited participant, National Institute of Justice, Los Angeles, California (November 2009)

SELECT PROFESSIONAL EXPERIENCE

• Completed objectives under Federal Consent Decree as Interim Chief of Police, East Haven, CT, the only municipality among 17 others that met its timeline for procedural and training goals
• Managed Stamford Police Department’s $42 million budget for 120,000-citizen community
• Implemented a strategic plan for policing Stamford through 2012
• Served as Adviser, City of Cambridge, MA, Deputy Superintendent Assessment

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• Served as Adviser, City of Waterbury, CT, Police Chief Selection Board
• Served as Adviser, City of Lowell, MA, Deputy Superintendent Assessment
• ICITAP Technical Assistant to the Nigerian Police Force, Kaduna, Nigeria, a city of 4 million people, to improve the relationship between the community and the Nigerian Police Force
• Served as Adviser, City of Wakefield MA, Police Chief Assessment
• Served as Monitor, Town of Tisbury, MA
• Served as Adviser, Town of Bolton, MA, Police Chief Selection Committee
• Served as Adviser, Town of Brookline, MA, Police Chief Selection Committee
• Served as Adviser, City of Pittsfield, MA, Police Chief Selection Committee
• Conducted operational review of police operations, Springfield Police Commission, Springfield, MA
• Served as Adviser, Town of Southbridge, MA, Police Chief Selection Committee
• Served as Adviser, Town of Wellesley, MA, Police Chief Selection Committee
• Served as Adviser, Town of Holliston, MA, Police Chief Selection Committee
• Served as Adviser, Town of Northborough, MA, Executive Officer Selection Committee
• Served as First Civil Rights Officer, Framingham Police Department, Framingham, MA
Carol E. Rasor-Cordero has served in leadership roles in the public and education sectors for more than 30 years. A veteran law enforcement executive and educator, she brings data research skills, training and development, project management, and leadership development experience to a wide variety of performance management and security consulting assignments, including the operational analysis of more than a dozen municipal police departments.

Her expertise includes providing extensive data-driven research and analysis, as well as technical assistance, to law enforcement agencies to improve their effectiveness and efficiency through the application of best practices in the field. Carol is well known for conducting training needs assessments and developing targeted programs based on quantitative and qualitative analyses detailing the performance of law enforcement agencies. She is experienced in developing written reports documenting this analysis and providing recommendations for organizational change and improvement.

Carol is a Senior Consultant and Researcher with the Center for Public Safety Management (CPSM), which provides public safety technical assistance and training for the membership of the International City/County Management Association (ICMA), a nonprofit professional association of local government managers. In this capacity, Carol is currently engaged as Team Leader for a security analysis for the City of Parkland, Florida, and as Team Leader for an operational analysis of Alpharetta, Georgia’s Police Department. She has worked on more than a dozen police department reviews, mostly as Team Leader.

Education

Ph.D.,
University of South Florida

M.A., University of South Florida

B.A. University of South Florida
An Associate Professor, Carol contributed to creating the first online curriculum in Florida for a Bachelor in Applied Science in Public Safety Administration at the College of Public Safety Administration, St. Petersburg College in Clearwater, Florida, where she has been a faculty member for more than a decade. She also launched and directed a Gang-Related Investigations specialty track at the College within its Criminal Justice Technology program. Carol has testified before the Florida Congressional Committee on Criminal Justice regarding gang growth and activity. As a result of her experience working and researching gangs, she designed and delivered a seminar format for a Gang Reduction Statewide Summit in Tallahassee on behalf of the Florida Attorney General’s Office.

Carol has extensive experience in team management and crisis responsiveness having developed emergency operations response and crisis teams during her tenure as Shift Commander (Patrol Operations Bureau) and Lieutenant (Judicial Operations Bureau) in Pinellas County, Florida. Earlier, Carol spent 10 years in the Law Enforcement Training Section of the Patrol Operations Bureau as a Sergeant, and later a Lieutenant, where her increasingly responsible roles included instructor, manager, certified high-liability instructor and, ultimately, supervisor for training programs of 800 law enforcement officers.

During her tenure as Commander of the Community Services Division in Pinellas County, Carol managed community policing, which grew by 300%, and cultivated community partnerships, establishing the Citizen’s Community Policing Institute. She established the Domestic Violence Unit, the Sexual Predator and Offender Unit, and served as the agency’s training adviser. She was instrumental in helping transform the Pinellas County Police Academy from a vocational curriculum to one that offered college accreditation at St. Petersburg College.

Carol retired from a laudable 25-year career in law enforcement in Pinellas County, Florida, where she was well respected for her commitment to best practices, her development of exceptional training modules and her insights into community needs. She was able to effectively communicate with diverse stakeholders and is skilled in collaborating with community representatives to help create environments to initiate change and build stronger bonds with law enforcement.

PREVIOUS EXPERIENCE

- Center for Public Safety Management (CPSM), Team Leader, Operational Analysis of the Sugarland Police Department, Texas, 2018
- CPSM, Team Member, Operational Analysis of the Marysville Police Department, Washington, 2018
- CPSM, Team Leader, Operational Analysis of the City of Las Vegas Department of Public Safety, Nevada, 2018
- CPSM, Team Leader, Operational Analysis of the Roselle Police Department, Illinois, 2017
- CPSM, Team Leader, Operational Analysis of the New Braunfel Police Department, Texas, 2017
- CPSM, Team Leader, Operational Analysis of the Coconut Creek Police Department, Florida, 2017
- CPSM, Team Leader, Operational Analysis of the Brentwood Police Department, Missouri, 2017
- CPSM, Team Leader, Operational Analysis of the Wauwatosa Police Department, Wisconsin, 2016
- CPSM, Team Leader, Operational Analysis of the Motts Community College Police Department, Michigan, 2016
Carol E. Rasor-Cordero, Ph.D., M.A., B.A.  Monitorship Team Member

- CPSM, Team Leader, Operational Analysis of the Dunn County Sheriff’s Department, Wisconsin, 2016
- CPSM, Team Leader, Operational Analysis of the Dover Police Department, Delaware, 2016
- CPSM, Team Leader, Operational Analysis of the Anniston Police Department, Alabama, 2016
- CPSM Team Leader, Operational Analysis of the Sandy Springs Police Department, Georgia, 2015
- Bureau of Justice, Washington, DC, Training Needs Assessment for Narcotics Unit, Atlanta Police Department, 2008
- North District Station, Patrol Operations Bureau, Pinellas County, FL, 2005-2006
- Judicial Operations Bureau, Pinellas County, FL, 2002-2005
- Patrol Operations Bureau, Community Services Division and Law Enforcement Training Sections Pinellas County, FL, 1988-2002
- Patrol Operations Bureau, Corporal, Detective, Deputy Sheriff, 1981-1988

PROFESSIONAL AFFILIATIONS / OTHER

- National Academy of Criminal Justice
- Center for Public Safety Management (CPSM)
- Police Executive Research Forum (PERF), Active Member
- Leadership Pinellas
- International City/County Management Association

PUBLICATIONS

- Gangs are Schooled...But are they ready for an investigator with a degree? In The Coalition – The National Narcotic Officers Association Coalition, Winter 2009, Vol. 13, No. 1

PRESENTATIONS

- “Ethical and Moral Obligations During an Active Shooter Incident,” Active Shooter Incidents in Hospitals and Healthcare Settings Conference, All Children’s Hospital, Metropolitan Medical Response System and St. Petersburg College, November 12, 2014
- “How to Turn a Monumental Community Collaboration into a Manageable One,” the Community Anti-Drug Coalitions of America (CADCA) 19th Annual National Leadership Forum, Washington DC, February 2009
Carol E. Rasor-Cordero, Ph.D., M.A., B.A.  Monitorship Team Member


SELECT PROFESSIONAL EXPERIENCE

- Developed customized general order manual for Treasure Island Police Department
- Developed customized general order manual for Marco Island Police Department
- Designed and delivered community policing training to representatives from more than 35 law enforcement agencies throughout Florida
- Created three-part Community Policing Management Training delivered throughout Florida to mid- and executive-level leaders
- Served as a consultant for the Bureau of Justice Assistance, Washington, DC, Training Needs Assessment for Narcotics Unit, Atlanta Police Department
- Worked closely as subject matter expert with Florida Department of Law Enforcement, curriculum maintenance system workshop to thread community policing through basic recruit curriculum
- Developed brain injury prevention program for State of Florida law enforcement agencies
- Contracted as curriculum evaluator for community policing curriculum developed by Florida Regional Community Policing Institute of Florida
- Created course for Southeastern Public Safety Leadership Institute at St. Petersburg College, “Evolving Leaders in a Changing World”
  - Designed 6-part law enforcement training seminar qualifying for six upper division credits for the Bachelor degree program through experiential learning
  - Subjects included Leadership and Management, Organizational Behavior; Administrative Law; Community Relations, Managing Patrol & Specialized Units, and Research Practicum
- Served as project evaluator for multicultural diversity training for judges and court personnel project

StoneTurn.com
• Trained all facilitators of the statewide working committee for the Florida Attorney General's Statewide Gang Reduction Summit, December 13, 2007, Tallahassee, Florida
• Served as a program consultant and designed the program platform for multiple, simultaneous sessions for the Florida Attorney General's Gang Reduction Statewide Summit, December 19-20, 2007, Tallahassee, Florida
• Served as a national evaluator for the project “An Evaluation of the National Justice Based After School Pilot Program,” Office of Community Oriented Policing Services, U.S. Department of Justice, 2002
• Designed and presented leadership seminar for law enforcement women at Clearwater Police Department
• Served as project evaluator for multicultural diversity training for judges and court personnel project
Michael Costa, a Managing Director with StoneTurn, has deep experience in financial services and data analytics. He has worked with clients in the trading, financial services, education, healthcare and hospitality industries, as well as with public sector entities.

Michael has provided data analytics expertise to clients on matters involving remediation, monitorships, fraud investigations and valuation.

Prior to joining StoneTurn, Michael led the data analytics team at Collegis Education, a consulting firm in the higher education space. He specialized in student lifecycle analytics, marketing analytics and data systems integration, specifically for Customer Relationship Management (“CRM”), Learning Information Systems (“LIS”) and Student Information Systems (“SIS”).

Earlier in his career, Michael spent four years in the Valuation Advisory Services practice at Duff & Phelps, where he specialized in tangible asset valuation.

**PREVIOUS EXPERIENCE**

- Collegis Education (2014—2016), Data Analytics, Chicago, IL
- Duff & Phelps (2010—2014), Valuation Advisory Services, Chicago, IL
- Juno Development (2009—2010), Hospitality Development Consulting, Dallas, TX
SELECT PROFESSIONAL EXPERIENCE

• Michael has assisted in Monitorships, particularly in the areas of trade surveillance, transaction monitoring and data analytics. As part of these Monitorships, he has assessed the design and operating effectiveness of several surveillance platforms and related areas of operations, including trade surveillance, trader behavior, e-communication surveillance, voice surveillance, payment filtering, name list screening and transaction monitoring. Additionally, Michael has assessed remediation strategies for technology infrastructure, information systems, and data management and storage systems.

• Michael led the submission of a Tax Incremental Financing (TIF) application for a historical remediation project that was eligible for $20.6 million in incentives from the city of Dallas, Texas.

• Worked with the city of Naperville, Illinois to update geographic information systems (GIS) by building an application to allow users to interface with underlying database structures.

• Counsel for an independent broker-dealer engaged StoneTurn in a FINRA arbitration matter. The matter involved alleged “risky” trading of inverse leveraged exchange-traded funds by a particular trader employed by the independent broker-dealer. There were seven claimants groups, all groups of former clients of the trader, requesting relief from “significant losses” suffered as a result of the risky trades. Michael analyzed the entire trade portfolios of all claimant groups in order to quantify gains / losses for all trades. These analyses included Optical Character Recognition and text scraping of PDF documents and dynamic data modeling. Additionally, he incorporated data from relevant market indices corresponding to the timeframe as the alleged risky trade activity, including the economic recession of 2008-2009. As a result of these analyses, StoneTurn was able to help counsel prove that not only were the losses suffered not outsized with respect to the market, but that in many instances portfolios outperformed the general market. As a result, the matter settled outside of arbitration in mediation.

• Michael has dynamically modeled theoretical profit scenarios and student-outcomes based on variable cost-per-credit, historical student retention, variable marketing spend, and instructor costs. The result was a decrease in cost-per-credit coupled with a positive impact toward gainful employment compliance.

• Counsel engaged StoneTurn to assist an investment management firm with respect to an informal SEC inquiry on business activity. The inquiry required the identification of potential activity fitting the SEC’s definition of cross-trading and compliance with a corresponding data request. Michael assisted the investment management firm in complying with the SEC request. As a result of the SEC inquiry, counsel was required to perform a sample of e-communication reviews surrounding particular trade activity. He also performed statistical analyses to optimally target trades for e-communication review to minimize time and cost to the client and maximize sample coverage.
• Michael assisted on a large bank’s internal investigation and internal counsel team’s review of alleged money laundering across client accounts. This analysis included identifying incoming and outgoing wire transfers from the identified client accounts, as well as derivative transactions from subsidiaries and majority-owned investments. These analyses required the use of large database extraction, Optical Character Recognition, and text scraping of PDF documents. Additionally, Michael calculated theoretical net laundering activity using dynamic data modeling and visualizations.

• Michael assisted counsel to review a client’s historical trade activity in order to understand potential exposure to DOJ and SEC investigations into manipulative trading behaviors. The matter was complicated by the fact that the client had both personal and professional trading accounts outsourcing to multiple brokers. Michael determined exposure in the areas of Wash Trades and Marking the Close. In preparation of the potential investigation, he created data visualizations and targeted questions with which the client could reference and prepare. Additionally, he calculated theoretical gains resulting from the theoretical market manipulation and potential impact on the market.

• Michael has performed numerous quantitative and qualitative analyses on trade data investigations and litigation matters.

• While a student at Kellogg, Michael completed course requirements in Market Research and Analytics by designing a survey around mobile phone usage and performed subsequent statistical analyses using Stata, a statistical software program.
David C. Burroughs, a Partner with StoneTurn, brings nearly 30 years of law enforcement, public and private sector experience in fraud and forensic investigations, compliance and risk management, and monitorships. A 25-year veteran of the Federal Bureau of Investigations (FBI), he has supervised teams of investigators and analysts investigating a broad range of allegations, including white collar crime, gang violence, financial fraud, money laundering and racketeering.

A seasoned investigative strategist and tactician, David has managed scores of assignments involving alleged violations of state, federal and international law. He successfully brings discretion into the workplace, allowing for deep dive investigations to proceed without disrupting business-as-usual activity. He is exceptionally skilled in conducting interviews, developing evidence and supervising teams to conduct extensive compliance reviews. David’s decades-long experience working within the judicial system informs his ability to assist clients in developing case-ready materials for presentation to law enforcement, if required.

Prior to joining StoneTurn, David was Senior Managing Director at Lemire LLC, a firm specializing in compliance, risk and investigative matters. At Lemire, David supervised large-scale teams of forensic accountants, investigators and analysts for the firm’s public and private sector clients. He oversaw the monitorship team of a Swiss bank on behalf of the New York State Department of Financial Services (DFS) and is lead investigator and liaison for the federal monitorship of a 20,000-member construction union. His supervisory investigative expertise encompasses compliance reviews, including one case involving

**Education**
B.A., Monmouth University

**Practice Areas**
Compliance & Monitoring
Investigations
Anti-Corruption
Anti-Money Laundering
Sexual Misconduct
Due Diligence
Construction Integrity
allegations related to organized crime involvement in the waste hauling industry on behalf of the New York City Business Integrity Commission. In the private sector, David has conducted numerous cyber and forensic accounting reviews on behalf of corporate clients that suffered significant financial losses.

Prior to working in the private sector, David served in several increasingly responsible investigative and management positions with the FBI. His career included a range of assignments culminating in his most recent position as Supervisory Special Agent in charge of the New York Special Operations Technical Squad. In that role, David managed and directed highly sensitive investigations in support of criminal and counterterrorist operations. Previously as a Special Agent, he served as the lead case agent on numerous complex investigations, including matters involving white collar crime, money laundering, violent crimes and financial fraud.

The FBI Federal Law Enforcement Foundation honored David by selecting him as a recipient of its Investigator of the Year award in 2010.

PREVIOUS EXPERIENCE

- Lemire LLC, 2014-2018
- Federal Bureau of Investigation, Department of Justice, 1989-2014

PROFESSIONAL AFFILIATIONS

- Certified Anti-Money Laundering Specialist, Association of Certified Anti-Money Laundering Specialists (ACAMS)
- Member of Society of Former Special Agents of the FBI, 2014
- Member ASIS, 2014
- Member, FBI’s Technical Advisor Committee, 2012
- Award for Law Enforcement, FBI Executive Board Team, 2011

SELECT PROFESSIONAL EXPERIENCE

- Serves as Supervisory Lead Investigator, large construction union monitorship
- Served as a Supervisory Lead Investigator, monitorship of a Swiss bank
- Served as Lead Investigator, cyber fraud and identify theft involving CEO
- Served as Lead Investigator, internal fraud investigation, for a New York law firm
- Oversaw covert investigative operations for the FBI in New York
- Trained FBI case agents in technology systems and protocols
• Managed fraud investigations in the healthcare and financial sectors involving diverted pharmaceuticals, fraudulent financial instruments and employee fraud
• Led complex RICO investigations to include Operation Weed & Seed and *Operation Safe Home*
APPENDIX B
### Cost Proposal: Year 1

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<th>Community Engagement</th>
<th>Policy Reviews</th>
<th>Outcome Measurements &amp; Auditing</th>
<th>Technical Assistance</th>
<th>Training Assessments</th>
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TOTAL ANNUAL ESTIMATED COSTS

$1,666,220.00
## Cost Proposal: Year 2

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**TOTAL ANNUAL ESTIMATED COSTS**
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