

April 26, 2011

Det. Sgt. Robert Pekarul
Crime Suppression Unit
Meriden Police Department

Sir,

On behalf of the Crime Suppression Unit of 2009, its Supervisors, Detectives and Officers and on Behalf of the States Attorneys Office at GA-07, I would like to file a formal complaint against Officers Huston and Sullivan. In accordance with the Departments rules and regulations, I would like this incident investigated and formal action to be taken where warranted. The complaint is as follows:

During the week of April 16, 2011, I received a packet that was sent to the City Manager as part two of a two part complaint. The packet was labeled "Disparate Treatment Examples". The complaint that is being filed against Huston/Sullivan stems from what they wrote in Paragraph 9 of their two part complaint. The Paragraph begins on the bottom section of page 3 and ends midsection of page 4 of their complaint.

This paragraph speaks of an organized Prostitution investigation conducted by members of the Meriden Police Crime Suppression Unit at the "2041 Club" located at 2041 North Broad Street in Meriden. This investigation was conducted by members of the Crime Suppression Unit and was written by myself. The investigation was supervised by Detective Sergeant Baustien and Detective Lieutenant Merrigan. The Crime Suppression Unit was assisted by Patrol Officers of the Meriden Police Department who were assigned to the Crime Suppression Unit in 2009. This investigation was also assisted by the Connecticut State Police-Statewide Narcotics Task Force-South Central Office. The paragraph written by Sullivan/Huston essentially accuses the Crime Suppression Unit and the States Attorneys Office of covering up the investigation as it involved retired Meriden Police Lieutenant Robert Green. Because this paragraph accuses the Crime Suppression Unit of serious allegations, it accuses myself of these allegations since it was my case and I discovered that retired Lieut. Green had been involved with the club. Huston/Sullivan accuses Det. Sgt. Baustien and Det. Lt. Merrigan who were the supervisors in the Unit at the time and were in charge of the investigation. It also accuses current and retired members of the Meriden Police Department who were involved in the investigation. Two of those retired members are currently Police Officers with other Police Departments within Connecticut.

During the beginning stages of the investigation, I found that on occasion there would be a Meriden Police car in the parking lot of the 2041 Club after 2300 hours. Because it was common knowledge in the City that the Club was an establishment for Prostitution, I at first believed that Officers were going to the 2041 Club to conduct Law Enforcement on the customers. I had also read on blogs on various sex web sites that the Police were at the Club at times. Because as part of our case we were trying to conduct surveillance of the club and then stop customers to question them, I had asked Lt. Green if he could have

the Officers on his shift and himself stay away from the 2041 club. This was because we were doing an investigation at that location. Some of the information received was that he would also be there in his cruiser.

During our investigation, we conducted surveillance on numerous occasions and then stopped approximately five customers on different evenings to confirm our suspicions. We then utilized undercover Police Detectives from the Connecticut State Police to go into the club to pay for sex acts.

During the week of January 20, 2009, I obtained six arrest warrants and two search warrants based on our investigation. [During the week of January 9, 2009, Lieut Green retired from the Police Department which was common knowledge through out the Police Department. The talk was that he had obtained a job as a State Marshal for New Haven County which is a difficult job to obtain. {In writing this complaint I found that he had gone before the City Pension Board on January 12, 2009 and was granted his pension. His retired date was effective January 18, 2009.}]

On January 20, 2009, The State and Meriden Police Departments executed the arrests and search warrants. Over 50 pieces of evidence were seized on this one day including two DVR's. Over the next week, we obtained and executed approximately nine more search warrants for banks and storage facilities in Meriden, Berlin, Newington and Milford CT. In these search warrants approximately 400 VHS, DVD, DV type of media were seized.

During the week of February 6, 2009, I began examining the videos to obtain evidence to support the numerous charges against the six individuals plus additional charges that were created on site on January 20, 2009. It was during this time that I came across a video with retired Lieut. Robert Green. This video depicted him in full Meriden Police uniform inside the club with two females. The video shows him drinking a beverage out of a plastic cup. It is unknown what kind of beverage he was drinking. The audio of the video could be heard and from listening to the audio, I could hear Officer Witkin sign on for his 0000-0800 hour shift. This showed that retired Lieut.Green had been there on duty since he customarily worked the 2300-0700 hours shift and the time Off. Witkin signed on was around midnight.

Upon finding the video, I notified Det. Lt. Merrigan, who immediately notified the Chief of Police. When the video was located, retired Lieut. Green had been retired for over 3 weeks. Based on that alone, even if the liquid was an alcoholic beverage, there was nothing that could be done, drinking on duty, although against Department policy is not against the Law.

Upon the Chief being notified, members of the Crime Suppression Unit were assigned to review over 200 videos of sexual activity to look for more videos involving retired Lieut Green, other members of the Department as well as other individuals. It was during this review, that we discovered videos involving a Newington Police Officer in uniform. Chief of Police, Jeffry Cossette was notified and he in turn notified the Newington Police Chief. We also located videos of sexual activity involving individuals who were familiar

to one of the Detectives, including a family member of one of the Detectives. Those individuals INCLUDING that Detectives family member were interviewed for the investigation. {It should be noted that all these individuals were also on the States Attorneys Witness list for the trial of the Defendants prior to them pleading guilty}. Because the videos showed sexual activity between the known individuals and females in the club that occurred over a year prior to the raid, charges could not be brought. This was due to the Statute of Limitations on Misdemeanor charges. During the entire time, once retired Lieut Greens video was discovered, the States Attorneys Office in Meriden were notified (Supervising State's Attorney James Turcotte and States Attorney Seth Garbarsky) and they worked with us on this case. Each Defendant in the case was also given the opportunity through their Lawyer's to provide information about retired Lieut Green involvement in exchange for court consideration on their charges. Each one either declined the offer from the States Attorneys Office or had no knowledge.

During the finding of the video involving retired Lieut. Green, it was realized that the defendants (David and Danny Henderson) in the case had begun using DVR's to record conduct inside the club. They began this around the middle of 2008 till our search warrant execution on January 20th. Because the DVR's were password protected, I completed a search and seizure warrant and they were taken to the State Laboratory in Meriden for examination. This was done in 2009 as well and they were actually examined by the State Lab personnel in March 2011 in preparation for the case which was scheduled to go to trial in April 2011. {It should be noted that the State Laboratory is 2-3 years behind on cases that are not involving Murder or other more serious crimes}.

In February of 2009, Det. Sgt. Baustien made contact with retired Lieut Green and asked him to come to the Police Department for a voluntary interview. Retired Lieut Green agreed and Det. Sgt. Baustien interviewed him. Det. Sgt. Baustien stated that retired Lieut Green admitted to frequenting the club off-duty and having sexual relations with one or more of the girls. He stated that he never paid for it nor did he do it while on-duty. Det. Sgt. Baustien completed a written Police report on this interview and I included the information in a supplemental Police report as well.

During the summer of 2009, one of the Defendants, Laura Kuhl made contact with the Federal Bureau of Investigation in New Haven via her Attorney. She stated that she wanted to provide information about a Meriden Police Official being involved with the girls in the club. The Meriden Police Department received a call from an Assistant United States Attorney out of the Federal Courthouse in New Haven Connecticut. This individual notified Det. Lt. Merrigan of the information and stated that after the initial call, Ms. Kuhl did not wish to proceed with her information. The States Attorneys Office in Meriden even agreed to provide her with court consideration on her charges for her testimony against the Hendersons and any member of the Police Department. She again declined the offer to provide information against the Meriden Police Official (who we assumed was retired Lieut Green).

Based on all of this as listed above, the States Attorneys Office in Meriden stated that we did not have Probable Cause to arrest retired Lieut Green for any crimes. This was due to

the fact that there was no physical evidence and the one video showed no illegal conduct. This was also based on the lack of witnesses as well. This was after every member of the Crime Suppression Unit watched 8 hours a day of videos of sexual activity for over a month. We did everything in our power to prove a case against retired Lieut Green however in the end we could not obtain any evidence to support charges. It should be noted that the DVR's that were reviewed by the State Lab personnel in March 2011 also did not show any conduct involving retired Lieut Green or any other uniformed Police Officer. Because of the finding of the video of retired Lieut Green, all other cases involving the Crime Suppression Unit had to be put off for over a month.

All of the facts stated above are supported by physical evidence, City documentation as well as sworn Police reports.

IN CLOSING:

1....In the complaint written by Sullivan and Huston, they claimed that the video showed him drinking alcoholic beverages. The video does not show what he was drinking and there is no way to determine the substance by the video.

2....The club was raided after Lieut Green retired and so there would be no Internal Affairs investigation as he was not an employee, even though Sullivan/Huston state that it was covered up. Because he was not an employee, he could not be placed on any kind of administrative duty or leave as Huston/Sullivan stated in there letter. They could have checked the date of the raid as well as the date the videos were reviewed versus the date that Lieut Green retired, both are public information and obtainable by simple making a request at City Hall. They instead chose to make false accusations. {I was able to find out when Lt. Green retired by simply calling City Hall and asking)

3.... They allege that a THOUGH investigation was not done, however in fact one was completed with numerous Police Department individuals and other agencies involvement. The investigation took months of video review, interviews and court consideration type deals with defendants to persuade individuals to provide information against retired Lieut Green. Huston and Sullivan stated in their letter that a warrant was brought to the court but nothing was signed. In reality, no warrant was ever completed because the States Attorneys Office told us we did not have enough Probable Cause to support any charges.

4....Retired Lieut Green was interviewed a month after his retirement after all other means of investigation were exhausted. This too is standard operating procedure in interviewing suspects in any crime. Both Huston and Sullivan were trained as well in these tactics. They claim it was within days which it was not. This was all verifiable by simply reviewing dates and Police reports. During his interview he admitted to sexual relations with girls but never admitted to masturbating within the club, additional comments placed in Sullivan/Huston's report to bolster their complaint.

Sullivan and Huston in their complaint made accusations they knowingly knew were false and could have verified prior to completing their report. They also waited two years

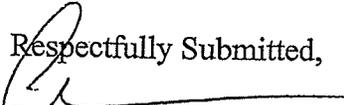
to report this activity to the City Manager that by rules and regulations of the Meriden Police Department should have been reported immediately had their information been true. They state in their report that it was well known around the Department in 2009 about Lieut Green. As sworn Police Officers they have a duty to report criminal activity of Department members immediately upon learning it, not two years after the fact and only after they were disciplined.

In their report they accuse the Police Officers, Detectives and Supervisors of the Crime Suppression Unit of corruption and mishandling an investigation of a Department member. They also accuse the States Attorneys Office as well. The Meriden Police Detective Bureau has had an excellent professional relationship with the States Attorneys Office for years. The States Attorneys have provided Detectives with their personal cell phone numbers, home phone numbers and addresses and open their homes to us at any time of the day or night without complaint. Such a relationship is necessary in trying to obtain arrest and search warrants after hours, in the middle of the night, etc. This occurs on a monthly basis if not more frequently and at some times has occurred weekly.

I believe that Sullivan and Huston intentionally lied in an official, signed transcript they signed as Police Officers. In signing this transcript as Police Officers they are swearing an oath to the truthfulness of the report. It is believed that they simply placed false information in their report in an attempt to bolster there complaint against the Chief of Police, the Deputy Chief of Police and the Internal Affairs Unit. They did so knowing that the information was false and not supported by facts and evidence. That by making these false accusations, they could bring discredit to a group of department members (Crime Suppression Unit, Detective Division) some having over 20 years of Police service to the City of Meriden. Therefore it is believe that they are in violation of the following Department Rules and Regulations in the making of their false allegations:

Section 13.3 Performance of Duty
Section 13.11 Filing a False Report
Section 13.31 Reporting Criminal Activity of a Department member
Section 2.11 Making a False Entry in an official report
Section 5.21 Failure to report illegal activity
Section 1.1 Conduct unbecoming an officer

Respectfully Submitted,


Detective John Williams #137
Meriden Police Department
Crime Suppression Unit

Copies sent to:

Det. Lieut Michael Merrigan
Chief of Police Jeffry Cossette