

# Exhibit C

**From:** [Rudolph, Lt. Karen](#)  
**To:** [Marc Perrusquia \(jmprsq\)](#); [Brownlee, Louis](#); [MEM MPD Public Information Office](#)  
**Subject:** RE: Request for information and interview and/or statement  
**Date:** Monday, July 27, 2020 6:09:05 PM

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Cases I2019-024, S2019-001, and I2019-037 were not referred to any prosecution agency or outside investigative agency.

Currently, being in line with other local law enforcement agencies, there is no formal process in place for submitting use of force complaints to the District Attorney General's Office. If a citizen presents a use of force complaint to the Inspectional Services Bureau (ISB), an administrative investigation is opened. Additionally, the citizen is advised that they may also elect to submit a criminal complaint to the appropriate bureau. Regardless, if the citizen chooses to move forward with filing a criminal complaint or not, ISB will proceed with the administrative investigation. During any administrative investigation, if an ISB investigator determines that there may have been criminal misconduct on the behalf of an officer, the ISB investigator should notify the ISB commanding officer immediately. The ISB commanding officer is then required to notify the Command Staff for further direction.

All officers with the exception of William Skelton are still currently employed with the Memphis Police Department.

It is the goal of the Memphis Police Department to strengthen its services to the community by authorizing the use of Body Worn Cameras (BWC) and In Car Video (ICV) technology. The BWC/ICV program will add further clarity and transparency to the examination of police-related events. This examination aids in improvement of prosecution by adding reinforcement and authentication to police casework, methods and evidence. The BWC/ICV program has the potential to improve community relations by providing an objective record that can be used to confirm valid allegations while providing an unbiased record that may assist in disproving false allegations. Furthermore, the ICV/BWC program improves accountability by providing objective data for review.

Lt. Karen Rudolph  
Memphis Police Department  
Public Information Office  
901-568-3079

----- Original message -----

From: "Marc Perrusquia (jmprsq)" <Marc.Perrusquia@memphis.edu>  
Date: 7/21/20 5:54 PM (GMT-06:00)  
To: "Rudolph, Lt. Karen" <Karen.Rudolph@memphistn.gov>, "Brownlee, Louis" <Louis.Brownlee@memphistn.gov>, MEM MPD Public Information Office <pio@memphistn.gov>  
Subject: RE: Request for information and interview and/or statement

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Anything on this?

**Marc Perrusquia**

Director, Institute for Public Service Reporting



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**From:** Marc Perrusquia (jmprsq)  
**Sent:** Thursday, July 16, 2020 5:23 PM  
**To:** Rudolph, Lt. Karen <Karen.Rudolph@memphistn.gov>; Brownlee, Louis <Louis.Brownlee@memphistn.gov>; MEM MPD Public Information Office <pio@memphistn.gov>  
**Subject:** Request for information and interview and/or statement

Hello,

I've reviewed more excessive force investigation files, these from 2019, and have some questions. I'd like to interview Director Rallings or a member of the MPD staff or, in the alternative, get a written statement. This is the essence of my questions:

1. Did you refer cases I2019-024 (Colin Berryhill), S2019-001 (William Skelton) or I2019-037 (Christopher Brunson) to any prosecutorial agency or outside investigative agency for review? If not, why not? If so, I'd like to see a copy of the referrals and answers.
2. What is your policy on referring excessive force cases to the District Attorney General or feds/U.S. Attorney for review?
3. How often do you refer such cases?
4. Which specific excessive force cases between Jan. 1, 2015 and the present have you referred?
5. Why was Ralph Confer (I2019-39) arrested in such a speedy fashion, 18 days after the incident? What made this case different from others? Did you consult the District Attorney on this one? What was the outcome of this criminal case?
6. Are any of these officers still on the force: Colin Berryhill, William Skelton, Christopher Brunson, Ralph Confer, Jonathan Sharman, Jonathan Halteman?

7. In the records released to me there are no statements of charges or records of administrative hearings or appeals and the like in I2019-024, or I2019-39. How were these cases resolved in terms of discipline?
8. Do you have a policy on “pain compliance”? Is it ever allowed?
9. Is body camera footage leading to the exoneration of more officers accused of misconduct and/or excessive force? Please explain.

Thank you.

**Marc Perrusquia**

Director, Institute for Public Service Reporting

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