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Law Enforcement Management Institute of Texas**

**AN ANALYSIS OF THE INTERACTION OF POLICY, THE INTERNAL
INVESTIGATIVE PROCESS, AND UNIFORM DISCIPLINE**

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Galveston County Sheriff Department
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RESERVE

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ABSTRACT

Law enforcement agencies across the United States have sought ways of achieving their goals and maintaining their values while assuring their commitment to the people they serve. The manner and consistency in which they achieve these ideologies are imperative to modern law enforcement.

This research examines the interaction of policy, the internal investigative process, and the application of uniform discipline. It purports the basic premise that law enforcement administrators must implement policy so their personnel know exactly what their duties and responsibilities are in the work place. They must establish a fair and objective internal affairs process to investigate misconduct, and when misconduct is substantiated, the use of uniform discipline is critical in maintaining fairness and equality within the agency. This premise will assure the agency's integrity to the community it serves.

An examination of case law, including a federal claim made against the Galveston County Sheriff Department in Thomas v. Galveston County, demonstrates how the interaction of these entities can be crucial in achieving the dismissal of liability claims in civil litigation. In addition, the results of a survey of fifteen sheriff departments in Texas, which included the Galveston County Sheriff Department, supports the incorporation and use of these entities.

The Galveston County Sheriff Department has not fully realized the ramifications in the use of the basic premise of these ideologies. It exists at the present time with only a partial acceptance of these entities and the standards they encompass. With an examination of this research, hopefully the Galveston County Sheriff Department will embrace these ideologies and apply them to the department as the operating standard.

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INTRODUCTION

Recent events involving police misconduct across the United States have brought about a growing public awareness and concern about how law enforcement deals with employee misconduct. In order to maintain public trust and integrity, police entities have instituted policies pertaining to expected employee behavior, investigative processes dealing with employee misconduct, and the implementation of discipline. It is the intent of this study to examine how an established policy and procedure, internal affairs operations, and applied uniform discipline interact with one another. This interaction is instrumental in maintaining an environment of equality and fairness among police employees, while assuring trust from the public they serve.

Currently at the Galveston County Sheriff Department there exists basically a traditional or unwritten policy for dealing with expected employee behavior, the investigation of misconduct deviating from that behavior, and assigning discipline when the misconduct is substantiated. The main exception is the Correctional Division, which has a written policy because it is state mandated for compliance. While a written disciplinary policy does exist, it is narrow in its scope and does not delineate types of misconduct. It places the responsibility on each divisional commander to ensure that employees understand their duties and responsibilities, mainly with unwritten directives, while recommending discipline for any misconduct. This type of procedure does not allow for discipline to be implemented uniformly.

The research and conclusions of this study will be presented to the administrative staff of the Galveston County Sheriff Department for review. Its purpose is to give insight when considering future policy implementations.

The information for this study will be obtained from articles, journals, and studies that pertain to the subject. Case law and court decisions on policy, the investigation of misconduct, and discipline will also be utilized. This study also proposes to conduct an independent survey of fifteen sheriff departments located in Texas, proportional in size and including the Galveston County Sheriff Department. This survey will pertain to the existence of an established policy and procedure, an internal affairs entity, and written uniform disciplinary policy. The results of this survey will be used to assist in forming the conclusion of this study.

It is the intent of this study to show that the interaction of an established policy, an investigative process into misconduct, and discipline applied uniformly are imperative in today's law enforcement. This interaction is instrumental in creating and maintaining equality within the organization and in reducing civil litigation. This

relationship is the controlling mechanism for consistency within the organization while insuring its purpose and goals to the community.

HISTORICAL, LEGAL, OR THEORITICAL CONTEXT

One of the most important facets of police management, which is often overlooked, is the establishment of organizational goals. In the context of police organizations, goals are those measurable end results toward which the total agency strives. Coupled with these are the objectives of the organization which are those intermediate organizational achievements usually accomplished by individual units, which when realized will cause the organization to reach its goals. In order to attain goals and objectives, management must establish workable procedures for documenting all expectations and advising individuals of their duties and responsibilities. Therefore, the major management focus should be on creating an environment and system for the achievement of department expectations and decreasing the probability for unacceptable behavior (IACP 1976)

The operations of a police agency are so complex that a systematic procedure for issuing written directives must exist. This is true in all agencies, but especially true as the size of the agency increases and tasks become more complex. Many police operations are carried out over different periods of time and often are separated by geography, and the agency cannot operate efficiently with outdated rules or oral transmittals that do not delineate management expectations. A police agency without a proper system for disseminating policies, procedures and rules, will not reach its maximum efficiency. Even a department with a high potential for leadership will suffer without a system of written directives to insure adequate direction and control. Without such a system, officers must and will rely on their own discretion in carrying out organizational goals (IACP 1976). This is one of the main reasons why policies must be written, not merely understood, since written policies are necessary to protect the department, its members and the citizens (Braunstein and Tyre 1992).

Thus the design and implementation of an effective directive system is imperative to the modern police agency. Only the chief or sheriff should have the authority to promulgate directives, which delineate departmental goals. Mid-management and organizational commanders should have the responsibility to promulgate written directives, which explain methods of reaching the applicable unit objective. Management expectations must be clearly delineated if employees are to be held accountable for carrying out assigned tasks. All employees, regardless of assignment, have the right to know exactly what is expected of them (IACP 1976).

To avoid a conglomeration of written directives, management must categorize directives by particular purposes. These categories should include rules and regulations to cover situations, in which no deviations or exceptions are permitted, policies that guide the organization and its employees in the direction of organizational goals, and procedures which describe expected methods of operation (IACP 1976).

A reduction in conflict with the socialization of organizational directives by an agency's employees can be obtained by an increase in their input in the management system and decision making. Furthermore, employee training and indoctrination of agency directives that establish agency expectations is imperative. This can enhance employee acceptance of written directives and instill more confidence in the administrative system for obtaining feedback from lower level personnel. In addition rules and regulations, policies, and procedures must be legal and kept current by review of not only management but by the legal section of the agency. Changes in law and prevailing trends of the courts must be monitored to insure directives are up to date (IACP 1976)

Citizens have the right to question the operation of public service organizations, including law enforcement. In order to function effectively, law enforcement needs public confidence and trust in the officers empowered to enforce the laws (Ware 1977). There are over 25,000 police agencies in the United States, and all but a few have an internal affairs process to investigate police misconduct. The internal affairs process that a department uses to handle complaints will dramatically affect the overall morale of the agency and substantially affect the value system and the overall ethics of the organization. Furthermore, the value system established by the leadership of the agency, the community and agency personnel will largely determine the parameters of acceptable and non-acceptable behavior. Therefore, implementing a fair and equitable internal affairs process within a police agency is perhaps one of the more critical elements in fostering positive morale and establishing a value system that promotes a high ethical standard for employees within the organization. A credible system that is respected by agency personnel and facilitates the reporting of misconduct inside the agency is an essential ingredient for maintaining integrity within a police organization (Rothlein and Lober 1996).

Unfortunately, many law enforcement administrators still view internal affairs as a necessary evil that has little importance and impact upon agency integrity and morale. However, the threat of external intervention in departmental functioning and policy making becomes a reality when a department is unable or unwilling to resolve its internal problems through its internal affairs unit. If a police department cannot maintain its integrity through its internal affairs unit, other outside, federal or state agencies will try to do just that (Ware 1977).

Therefore, the law enforcement organization must find an individual to direct this unit who is representative of the very finest in law enforcement and should be relied upon to acquire subordinate investigators with impeccable backgrounds (Ware 1977). These include those with the desire to ensure that law enforcement personnel are provided with an impartial fact finder and the knowledge that their work will help to ensure that the agency maintains the highest level of integrity and professional service to the public. The internal affairs unit exists to maintain organizational integrity and standards, and should be viewed as a positive component of the organization (Schoebel 1996). It is essential that the internal affairs entity be free from internal and external pressures and embraced by the administration and the community.

When an internal affairs investigation is sustained, the level of discipline imposed will dramatically affect the agency's overall morale. If the discipline is too lenient, then the consequences of engaging in the misconduct may be viewed by some as insignificant. However, when the discipline is too severe, personnel within the agency may become demoralized and perceive the administration of the department as overreacting to pressure or being unfair. If discipline is inconsistent, it will appear that preferential treatment is being given to some violators, while others are more severely punished. Once a precedent is established concerning an appropriate level of discipline, any future deviation may cause a perception that inconsistent standards have been applied. Nothing can be more demoralizing than the perception that certain individuals are given preferential treatment, even when they engage in misconduct. Police administrators must establish a consistent methodology in the application of discipline. (Rothlein and Lober 1996). Important factors in establishing a consistent methodology are to show the public that the department is making a sincere effort to act on complaints of alleged misconduct. However, this methodology must convince departmental employees that the investigative procedure is necessary, will be fair and objective, and will provide protection against unwarranted allegations (Ware 1977).

Police understand the disciplinary processes in those agencies that issue clear and concise directives on disciplinary procedures. These procedures must be based on essential fairness; must apply to all departmental employees and must be enforced on a non-discriminatory basis. Furthermore, these directives must clearly define the area of concern and should state explicitly what constitutes a violation. Directives that increase discretion, instead of direction and control, are of questionable value in achieving the integrity of a department. Impropriety thrives best in poorly run organizations, in which authority and responsibility are vaguely defined, discretion is broad, and supervision is minimal (Ware 1977).

The Galveston County Sheriff Department has yet to fully embrace these principles and apply them to the department as the operating standard. Departmental values and goals must be clearly defined by the administrative staff and put into practice, establishing accountability to the community and direction in achieving clarity and understanding within the department as a whole.

REVIEW OF LITERATURE OR PRACTICE

Previously discussed were many of the theories found in the 1976 model policy developed by the International Association of Policy Chiefs. Associated with this model is a study conducted by the (IACP), that found in 17 cities only a few more than half of the officers even understood how internal affairs worked, or what would happen to them if they were investigated (IACP 1976).

Furthermore, a report to the Los Angeles Police Commission on the department's implementation of the (Christopher) Independent Commission recommendations found that the increased role of internal affairs improved the quality of disciplinary investigations. The Christopher Commission further reported that complaint investigations play a pivotal role in any agency's ability to police its own. However, despite the strong recommendation of the 1991 Christopher Commission report, no comprehensive system is in place to collect, analyze, and disseminate data on certain force related misconduct. The Los Angeles Police Department is not able to objectively demonstrate that it has applied rigorous standards for holding supervisors, managers and executives personally accountable for failure to act and for affirmative management of liability risk (Bobb, et. al. 1996).

Police Commissioner William J. Bratton of the New York Police Department pointed out a keynote in a 1995 study of his department that there must exist an environment where every officer understands that his or her primary loyalty is to the law. Such an environment requires more than an effective system for detecting and punishing police wrongdoing. It requires a comprehensive, integrated approach to restructuring the department in its entirety. This includes recruitment, training, supervision, and disciplinary systems. This also requires a new policy of inclusion in which the accountability for integrity issues is spread throughout the command staff and the responsibility for keeping the department corruption-free is shared by all police officers (Bratton 1995).

Fifteen sheriff departments in Texas were surveyed by the author in regard to the application of policies and procedures, internal investigations, and uniform discipline within their departments. The sheriff departments were chosen on the basis of county population and Galveston County was inclusive in the survey. By population, Galveston County is the fifteenth largest county (244,447) in the state of Texas. The survey included seven counties

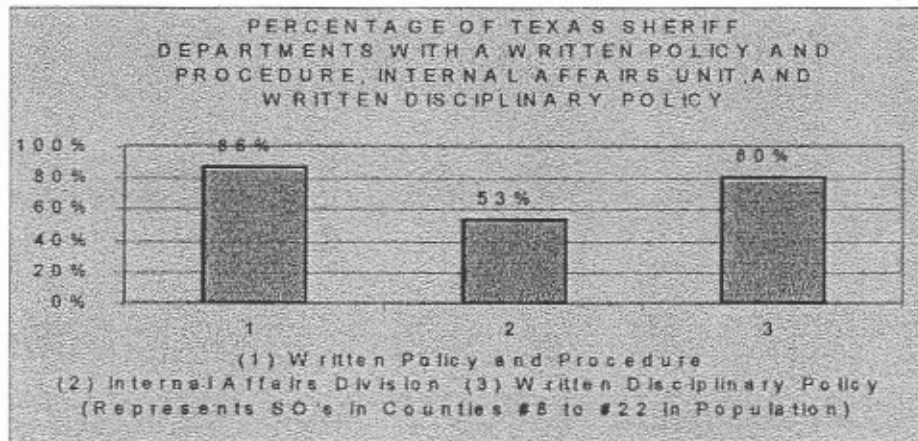
with populations greater than Galveston County and seven counties with populations less than Galveston County, or counties ranking #8 (386,875) to #22 (166,164) in population in the state of Texas (Texas State Directory 1999).

These departments were asked to provide the following information:

1. The current number of full time employees, including sworn deputies and civilian personnel.
2. Does the department have a written policy and procedure encompassing the entire department?
3. Does the department have an Internal Affairs Division?
4. Does the department have a written uniform disciplinary policy?

The results of the survey were assigned a value by percentage and Figure #1 reflects these percentages. The survey found that 86% of the fifteen counties in the survey has a policy and procedure for their entire department, 53% have an Internal Affairs Division, and 80% have a written uniform disciplinary policy. The Galveston County Sheriff Department is one of only two counties in the survey that does not have a written policy and procedure for its entire department. Over half of the departments surveyed have an Internal Affairs Division, including two counties with departments smaller than the Galveston County Sheriff Department. The Galveston County Sheriff Department was included as having a written uniform disciplinary policy in the survey, but it should be noted that the policy does not delineate types of misconduct and is very narrow in scope.

Figure #1



The information contained in Figure #2 documents the information obtained in the survey. There was not a correlation observed that the size of the department was proportional to the population of the county. Therefore, the sheriff departments listed in Figure #2 are in descending order by the number of full time employees in the department.

SURVEY OF TEXAS SHERIFF DEPARTMENTS
(Represents SO's with Counties #8 to #22 in Population)

Figure #2

COUNTY SHERIFF DEPARTMENT	NUMBER OF EMPLOYEES	WRITTEN POLICY AND PROCEDURES	INTERNAL AFFAIRS DIVISION	WRITTEN UNIFORM DISCIPLINARY POLICY	COUNTY POPULATION
MONTGOMERY COUNTY SO	420	YES	YES	YES	247,970
JEFFERSON COUNTY SO	405	YES	YES	YES	245,452
NUECES COUNTY SO	400	YES	YES	YES	311,543
DENTON COUNTY SO	390	YES	YES	YES	358,957
COLLIN COUNTY SO	353	YES	YES	NO	386,875
BRAZORIA COUNTY SO	325	YES	YES	YES	222,179
FORT BEND COUNTY SO	320	YES	NO	YES	308,999
GALVESTON COUNTY SO	310	NO	NO	YES	244,447
LUBBOCK COUNTY SO	280	YES	YES	YES	233,642
WEBB COUNTY SO	270	NO	NO	NO	180,011
MCLENNAN COUNTY SO	265	YES	NO	YES	203,220
SMITH COUNTY SO	265	YES	NO	YES	166,164
WILLIAMSON COUNTY SO	251	YES	YES	YES	203,428
BELL COUNTY SO	234	YES	NO	NO	225,513
CAMERON COUNTY SO	222	YES	NO	YES	318,132

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DISCUSSION OF RELEVANT ISSUES

As law enforcement moves into the new millenium it must be strong enough to withstand a new found and constant public scrutiny. Law enforcement is challenged by the ever-changing organizational environment of modern policing. However, no matter how our environment changes, law enforcement leaders will be left with the responsibility and the accountability for the organization and its values. In any organization there is a need to attend to the members of the agency and to listen to and care for the people who make the place work. In this manner police executives will be cognizant of the organization's values, and be willing to constantly assess the direction in which the organization is moving based on those values. The failure to send clear signals about the notion and importance of sound organizational values leaves the agency without direction or foundation (Rainquet 1992). Therefore, law enforcement agencies must adopt and have in place clear and concise policies and procedures delineating employee's duties and responsibilities, a credible policy detailing the method of investigation of employee misconduct, and when any employee misconduct is substantiated, apply discipline fairly and uniformly. Establishing policy that is consistent and functioning properly establishes credibility within the department and assists in setting the values and mores of the police organization (Rothlein and Lober 1996).

It would be an understatement to say that we live in a litigious society. Possibly law enforcement, like no other profession, is acutely aware of this unfortunate fact. The types of civil lawsuits that arise in law enforcement are generally the same types of case that necessitate internal affairs investigations. Wrongful deaths, officer involved shootings, incidents of brutality, deprivations of constitutional rights, injuries resulting from police chases and discriminatory practices (including sexual harassment) are representative of the civil actions brought against police departments. Most, if not all, of these incidents would normally involve an internal investigation by the department (Rothlein and Lober 1996).

Law enforcement officials are aware that in some instances that police agencies or their legal counsel settle some civil actions strictly as a business matter, even though it is not an admission of guilt. However, consider the public perception in these instances and the negative ramifications there can be on the agency (Liquori 1992). Therefore, it may be wise for law enforcement administrators to ensure that internal affairs investigations are conducted for all police misconduct cases that may give rise to civil liability (Rothlein and Lober 1996).

The internal affairs investigation of an incident that gives rise to a civil lawsuit can have a direct impact on the outcome of the litigation. Many times, the timely, full and complete investigation of an incident will be the

department's best ammunition several years later, when they are called on to defend the involved officer's actions or the department's handling of police misconduct. However, the lack of a timely, full and complete internal affairs investigation, or the failure to take appropriate action for sustained instances of police misconduct, can significantly enhance the plaintiff's case. Therefore, it should be obvious to police administrators concerning the prudent use of internal affairs investigation for incidents that potentially give rise to civil lawsuits. A prompt, full and complete internal affairs investigation, coupled with appropriate disciplinary action by the department, can minimize or even eliminate civil liability. (Rothlein and Lober 1996).

A case in point serving as an example of this process occurred at the Galveston County Sheriff Department in 1995. In this case, Debra Jo Thomas was an inmate booked into the Galveston County Jail in September 1994 for a parole violation and a new burglary offense. During her confinement at the jail a deputy allegedly sexually assaulted and harassed Thomas on four separate occasions. The last incident occurred in January 1995. During each incident, the deputy made repeated threats to Thomas in an attempt to keep her quiet about his activities. These episodes were of a sexual nature and on the final occasion forced Thomas to commit a sexual act. Thomas did not report any of the deputy's activities to any of the guards or jail staff until after the final incident in January 1995 (Thomas v. Galveston County 1997).

In this case, Thomas was an inmate of the Galveston County Jail awaiting her transfer to the Texas Department of Corrections when the alleged violation of her Constitutional rights stemming from the deputy's sexual assaults occurred. The county, therefore, had a constitutional obligation under the Eighth Amendment to provide humane conditions of confinement and to take reasonable measures to guarantee the safety of the inmates (Hudson v. Palmer 1984). Thomas' claim challenged the adequacy of the levels of safety and security given to inmates of the Galveston County Jail. Therefore, Thomas' claim properly alleged a constitutional violation (Thomas v. Galveston County 1997). Attorneys for Inmate Thomas filed a civil action under 42 U.S.C. 1983 in the United States District Court for the Southern District of Texas against the County of Galveston for a considerable sum.

Section 1983 provides that every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State subjects or causes to be subjected, any person within the jurisdiction of the United States to the deprivation of any rights secured by the Constitution and laws, shall be liable to the party injured (42 U.S.C. 1983). Therefore, an actionable Section 1983 claim must allege a deprivation of rights secured by the Constitution by a person acting under color of state law (Daniels v. Williams 1986). Although municipalities are persons within the

meaning of Section 1983, they may only be held liable if the constitutional harm suffered was the result of an official policy, custom, or pattern (Monell v. New York City 1978). Therefore, in order to hold a municipality liable, a plaintiff must show that his or her constitutional deprivation was caused by the county's adoption of, or failure to adopt, the particular policy, and that such an act amounted to an intentional choice (Hare v. City of Corinth 1996).

The Fifth Circuit defined an official policy for the purposes of Section 1983 liability to be either: 1) a policy statement, ordinance, regulation, or decision that is officially adopted and promulgated by the municipality's law making officers or by an official to whom the lawmakers have delegated policy making authority; or 2) a persistent widespread practice of county officials or employees, which, although not authorized by officially adopted and promulgated policy, is so common and well settled as to constitute a custom that fairly represents municipal policy (Webster v. City of Houston 1984)

The evidence in the case supported that Galveston County had specific policies against the very occurrences reported by Thomas. The court noted that any violations of those policies were to be immediately reported to the offending deputy's supervisor so that corrective action could be undertaken. In fact, all deputies who work in the jail are taught the policies and procedures of the Galveston County Sheriff's Department Corrections Division. These policies and procedures contain numerous safeguards to protect the female inmates of the jail. The policy regarding abuse of inmates plainly states that verbal and or physical abuse of an inmate will not be tolerated, and violation of this rule may serve as a basis for immediate termination. These policies appear to work in practice as well as in theory. When Thomas finally reported the deputy's activities to jail personnel in January, the jail supervisors responded immediately. As a result, corrective action was taken, and the deputy was suspended without pay and subsequently terminated. As a result of an ensuing internal affairs investigation that began the same day supervisors were notified, the deputy was arrested on criminal charges of sexual assault and official oppression (Thomas v. Galveston County 1997).

The plaintiff, Thomas, failed to establish an official policy for the purposes of the Section 1983 liability. Thomas failed to establish a genuine issue of material fact that the county knew of and disregarded an excessive risk to her health and safety as required by the Supreme Court's subjective deliberate indifference test (Thomas v. Galveston County 1997). The court granted Summary Judgement and all federal claims in the action were dismissed against Galveston County.

CONCLUSION / RECOMMENDATIONS

This study has discussed the theoretical and practical applications of the use of policies and procedures, the internal investigative process, and the application of uniform discipline. It has shown that the interactions of these entities are critical to modern law enforcement. Having in place well-written and concise policies and procedures will convey to the employee the expectations of the administration, while delineating exactly what their duties and responsibilities are in the work place. When employee deviation from these directives is identified, there must be in place a fair and equitable internal affairs process for investigating the misconduct. Furthermore, if the misconduct is substantiated, then the application of uniform discipline is instrumental in maintaining departmental morale and integrity. Employee indoctrination, training, and integration into the processes involved within these entities will assist in maintaining the departmental values and goals.

The Galveston County Sheriff Department currently operates for the most part under a traditional or unwritten policy system. The notable exception is the Correctional Division, which has written policy for state compliance. There is not a written policy or procedure for the processing of complaints or conducting internal investigations on departmental personnel. While the department does have an internal affairs investigator, there is not a separate entity for conducting these type investigations. A written disciplinary policy does exist, but it does not delineate types of misconduct. While maintaining due process, the discipline assigned for substantiated employee misconduct under this system does not allow for uniformity and consistency.

The results of the sheriff departments surveyed in this study reveal that the Galveston County Sheriff Department is the exception rather than the rule in applying policies and procedures, maintaining a separate entity for conducting internal investigations, and applying uniform disciplinary standards. The Galveston County Sheriff Department is the largest law enforcement agency in Galveston County. The department has a moral, legal, and ethical responsibility to carry out the law. In fulfilling these goals, it is the author's hope that the department will set the standard for law enforcement in Galveston County and embrace the ideologies set forth in this study.

In the Order Granting Summary Judgement in Thomas v. Galveston County, the court made specific reference to the existence and use of written policy in the Correctional Division, conducting a swift and thorough internal investigation, and the use of discipline in correcting identified employee misconduct. It was the interaction of these three entities that was the basis for the court granting Summary Judgement and releasing Galveston County from all federal claims in the action.

Therefore, the practical application of written policies and procedures, an internal affairs entity, and uniform discipline should be extended throughout the department and applied to every division in the Galveston County Sheriff Department. The study has shown that these types of policy implementations will not only create an environment of fairness and equality within the work place, but also maintain departmental morale and integrity.

BIBLIOGRAPHY

- Bobb, Merrick J., et. al., Five Years Later: A Report to the Los Angeles Police Commission on the Los Angeles Police Department's Implementation of Independent Commission Recommendations. Los Angeles: Ca., Special Counsel, Los Angeles Police Commission, 1996.
- Bratton, William J., Police Strategy No. 7: Rooting Out Corruption; Building Organizational Integrity in the New York Police Department, New York: New York, 1995.
- Braunstein, Susan and Mitchell Tyre. "Building a More Ethical Police Department." The Police Chief January 1992: 30-34.
- Daniels v. Williams, 474 U. S. 327, 329-31, 106 S. Ct. 662, 664-65, 88 L. Ed. 2d 662 (1986)
- Hare v. City of Corinth, MS, 74 F. 3d 633 (5th Cir. 1996)
- Hudson v. Palmer, 468 [*11] U. S. 517, 526-27, 104 S. Ct. 3194, 3200, 82 L. Ed. 2d 393 (1984)
- International Association of Chiefs of Police. Managing for Effective police Discipline. International Association of Chiefs of Police, Inc., 1976.
- Liquori, William A. "Maintaining Departmental Credibility." The Police Chief January 1992: 22.
- Monell v. New York City Department of Social Services, 436 U. S. 658, 690-94, 98 S. Ct. 2018, 2035-37, 2039, 56 L. Ed. 2d 611, (1978)
- Rainquet, Fred W. "No Excuses Management." The Police Chief January 1992: 18-21.
- Rothlein, Steve and Richard Lober, "The Ramifications of Internal Affairs Investigations." The Police Chief April 1996: 37-42.
- Schoebel, Gary B. "What Drives the Internal Affairs Investigator?" The Police Chief April 1996: 45-50
- Texas State Directory. Austin, Tx., 1999.
- Thomas v. Galveston County, 953 F. Supp. 163; 1997 U. S. Dist.
- Webster v. City of Houston, 735 F. 2d 838, 841 (5th Cir. 1984)
- Ware, Mitchell. Developing a Police Anti-Corruption Capability. New York, New York: Criminal Justice Center, 1977.
- 42 U. S. C. 1983.

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SURVEY SOURCES

Bell County Sheriff Department
Brazoria County Sheriff Department
Cameron County Sheriff Department
Collin County Sheriff Department
Denton County Sheriff Department
Fort Bend County Sheriff Department
Galveston County Sheriff Department
Jefferson County Sheriff Department
Lubbock County Sheriff Department
McLennan County Sheriff Department
Montgomery County Sheriff Department
Nueces County Sheriff Department
Smith County Sheriff Department
Webb County Sheriff Department
Williamson County Sheriff Department

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