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EmployersCouncil.org

3/25/2022

Lori Cobler
City of Florence
600 W 3rd Street
Florence, CO 81226

Re: Workplace Investigation

Dear Lori:

Attached please find the final and complete City of Florence Investigation Report. I have attached the electronically signed summary statements procured in this process. These are typed on my computer during the interviews before they are electronically reviewed and modified as indicated by the participants before signature. All documents and materials obtained from participants during the interview process are also attached. Should you have any questions or concerns regarding the substance of this report, please do not hesitate to contact me.

Should disciplinary action result against any employee in consideration of this Investigation Report, the Fair Credit Reporting Act requires that the disciplined employee receive a summary of the nature and substance of findings. The "Summary of Findings" section of the Investigation Report is included to support that communication. The Investigation Report is not intended for disclosure to participants or management without a legitimate "need to know." Do not hesitate to contact me to discuss how you might otherwise choose to communicate with participants at the close of this process. For this and all other continuing issues related to addressing behavioral or performance issues, training, follow-up, or other employee relations issues, City of Florence is encouraged to seek counsel from Employers Council as a function of their membership.

Thank you for your assistance in the coordination of interviews in this process and thank you for your patience regarding provision of the final Investigation Report.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julia Paris', written over a light blue horizontal line.

EMPLOYERS COUNCIL, INC.

Julia Paris
Managing Attorney, Workplace Investigations

JP/ew

Attachments

INVESTIGATION REPORT

Confidential Information

Not For Distribution

To: Lori Cobler, Finance Director, and Human Resources for the City of Florence

Subject: City of Florence Police Department Workplace Investigation

Conducted by: Glen Fajardo-Anstine, Esq., Workplace Investigator, Employers Council, Inc.

Date of Report: March 25, 2022

Investigation

Active: February 9, 2022 – March 25, 2022

Procedure: Lori Cobler, Finance Director, and Human Resources for the City of Florence contacted Julia Paris of Employers Council (“EC”) to perform a workplace investigation into issues in the Florence Police Department. Ms. Paris explained the investigation and process to Ms. Cobler and clarified the investigator’s role and the necessary expectations in this process as communicated to all participants and referenced below.

The undersigned, Glen Fajardo-Anstine, Esq., assumed the role of investigator in this matter. I prepared written summary statements for each witness. I communicated similar introductory remarks to each witness. These remarks addressed the purpose of the investigation and my role as a neutral fact finder, confidentiality expectations, the City of Florence’s prohibition against retaliation for participation in the investigation and/or making complaints under the equal employment opportunity policy, and the expectation to be truthful. Each witness reviewed his or her statement with me. I encouraged each witness to make any additions, deletions, or other modifications necessary to accurately reflect his or her beliefs. Each witness was asked to review his or her statement to ensure completeness and accuracy and attest thereto by signing the summary statement.

All interviews were conducted via telephone. I interviewed the following individuals on the dates noted:

February 15, 2022:

1. Bill Vinelli, Former Deputy Chief for the Florence Police Department; and
2. Jason Dorman, Former Sergeant for the Florence Police Department.

February 16, 2022:

1. Ariana Isom, Former Corporal for the Florence Police Department; and

2. Michael Gordon¹, Former Sergeant for the Florence Police Department.

February 21, 2022:

1. Daniel Santiago, Police Officer for the Florence Police Department; and
2. Felix Montoya, Police Officer for the Florence Police Department.

February 22, 2022:

1. Alex Wold, Detective for the Florence Police Department;
2. Sean Humphrey, Sergeant for the Florence Police Department; and
3. Joe Sackett, Corporal for the Florence Police Department.

February 23, 2022:

1. Susan Barnes, Police Officer, for the Florence Police Department.

February 24, 2022:

1. Nancy Barth, Administrative Assistant for the Florence Police Department.

February 28, 2022:

1. Mike Ingle, Lieutenant for the Florence Police Department.

March 2, 2022:

1. Shane Prickett, Chief of Police for the Florence Police Department.

March 3, 2022:

1. Amanda Winters, Police Officer for the Florence Police Department.

March 8, 2022:

1. Sean Garrett, Interim-City Manager for the City of Florence.

Attachments:

1. Ariana Isom Complaint (February 8, 2022)
2. Michael Gordon Complaint
3. KRDO News Article (February 8, 2022)
4. Documents Supporting Shane Prickett (February 8, 2022)
5. Jason Dorman Timeline
6. Jason Dorman Notes
7. Jason Dorman Emails
8. Jason Dorman Meeting Notes with Michael Patterson (July 21, 2021)
9. Jason Dorman Meeting Notes with Sean Garrett (January 5, 2022)
10. Jason Dorman Meetings Notes with Sean Garrett (January 31, 2022)
11. Jason Dorman Complaint (February 9, 2022)
12. General Notes for Police Department

¹ When this investigation was initiated on February 9, 2022, Mr. Gordon was an employee of the Florence PD. However, this investigator understands while this investigation was ongoing, Mr. Gordon resigned.

13. Shane Prickett Email to city council (February 7, 2022)
14. Sean Humphrey Promoted Commander (February 16, 2022)
15. Ariana Isom Letter of Resignation (February 6, 2022)
16. Shane Prickett Request to Disable Ariana Isom's Employee Email (February 5, 2022)
17. Shane Prickett Email Regarding Ariana Isom (February 5, 2022)
18. Bill Vinelli Email to Sean Garrett (February 2, 2022)
19. Shane Prickett Email (January 4, 2022)
20. Shane Prickett Email Regarding Bill Vinelli's Resignation (February 5, 2022)
21. Shane Prickett Email (January 4, 2022)
22. Bill Vinelli Summary Statement
23. Jason Dorman Summary Statement
24. Ariana Isom Summary Statement
25. Michael Gordon Summary Statement
26. Daniel Santiago Summary Statement
27. Felix Montoya Summary Statement
28. Alex Wold Summary Statement
29. Sean Humphrey Summary Statement
30. Joe Sackett Summary Statement
31. Susan Barnes Summary Statement
32. Nancy Barth Summary Statement
33. Mike Ingle Summary Statement
34. Shane Prickett Summary Statement
35. Amanda Winters Summary Statement
36. Sean Garrett Summary Statement
37. KRDO Article (January 28, 2022)
38. Michael Gordon Email (February 2022)

Background and Summary of Issues

The City of Florence is located in Fremont County, Colorado. The Florence Police Department ("Florence PD") is located at Florence City Hall. This investigator understands that Shane Prickett was appointed the Chief of Police of the Florence PD on November 15, 2019. Chief Prickett has worked for the Florence PD since 2003.

This investigator understands Bill Vinelli was formerly the Deputy Chief of the Florence PD. Mr. Vinelli was appointed the Deputy Chief in November 2019. This investigator understands Chief Prickett did not hire Mr. Vinelli to be his Deputy Chief. This investigator understands that on January 27, 2022, Mr. Vinelli resigned from the Florence PD after he accepted an offer to become the Chief of Police of the Morrison PD. Mr. Vinelli worked for the Florence PD for approximately eight years. This investigator understands on January 27, 2022, Mr. Vinelli submitted his resignation to the Florence City Council during a public meeting. In addition, this investigator understands during the city council meeting on January 27, 2022, Mr. Vinelli openly discussed concerns with the Florence PD, including his concerns with the leadership of the department under

Chief Prickett's tutelage. This investigator understands Mr. Vinelli's concerns received media attention, and that Mr. Vinelli was interviewed by KRDO, a local media outlet. *See* Attachment 3. During an interview with KRDO, Mr. Vinelli alleged Chief Prickett "froze" him out of the Florence PD. *See Id.* In the KRDO article, Mr. Vinelli states on February 5, 2022, Chief Prickett emailed him and told him that he was to turn in his patrol vehicle, that he was to not return to the police department in uniform, that he was to enter the police department through the front office entrance, and that he was to turn in his keys and all of his equipment. *See* Attachment 20. Specifically, Mr. Vinelli's allegation against Chief Prickett is as follows:

- (1) That on February 5, 2022, after Mr. Vinelli raised concerns to city council about police officer pay, human resources, and security issues during a public meeting on January 27, 2022, Chief Prickett emailed Mr. Vinelli and unjustifiably requested that Mr. Vinelli turn in his patrol vehicle and equipment; that Mr. Vinelli's law enforcement services were no longer needed; that Mr. Vinelli was not to show up at the department in uniform; and that Mr. Vinelli was to come through the front office entrance of the police department. Mr. Vinelli further alleges that Chief Prickett's actions were influenced by Mr. Vinelli's raising of concerns to city council.

This investigator understands Michael Gordon was formerly a sergeant in the Florence PD, and that Mr. Gordon worked for the Florence PD for approximately eight years. This investigator understands while this investigation was ongoing, Mr. Gordon resigned from the Florence PD in February 2022. This investigator further understands that on June 2, 2021, Mr. Gordon and Mr. Dorman went to the former City Manager, Michael Patterson, and expressed their concerns with Chief Prickett's communication and leadership.

This investigator understands that on February 7, 2022, Mr. Gordon emailed the Interim-City Manager, Mr. Garrett, and the City of Florence's Human Resources and Finance Director, Ms. Cobler and raised several concerns regarding Chief Prickett's conduct towards them. Specifically, Mr. Gordon's allegations against Chief Prickett are as follows:

- (2) That on July 14, 2021, after Mr. Gordon and Mr. Dorman reported concerns with Chief Prickett to the City Manager, Michael Patterson on June 2, 2021, and July 6, 2021, Chief Prickett unjustifiably threatened to change Mr. Dorman's and Mr. Gordon's work schedules to 4:00 PM to 2:00 AM, and that this action was influenced by Mr. Gordon's and Mr. Dorman's report of concerns to the City Manager.
- (3) That on January 4, 2022, Chief Prickett unjustifiably proposed moving the department schedules to 12-hour shifts and that Chief Prickett's conduct was improperly influenced by Mr. Gordon raising concerns with city council.

This investigator understands that Jason Dorman was formerly a sergeant in the Florence PD and that Mr. Dorman worked for the Florence PD for approximately ten years. This investigator understands Mr. Dorman and Chief Prickett are brothers-in-law. Mr. Dorman resigned from the Florence PD in February 2022. Moreover, on February 9, 2022, Mr. Dorman emailed Ms. Cobler and expressed concerns with Chief Prickett's conduct towards Mr. Vinelli. *See* Attachment 11. In

addition, Mr. Dorman stated Chief Prickett eliminated his and Mr. Gordon's role of approving reports as sergeants. Specifically, Mr. Dorman's and Mr. Gordon's allegation against Chief Prickett is as follows:

- (4) That on February 5, 2022, after Mr. Dorman and Mr. Gordon spoke with the Interim-City Manager, Sean Garrett, on January 5, 2022, about concerns with an email Chief Prickett sent out about the 2022 Florence PD directives, Chief Prickett unjustifiably eliminated Mr. Gordon's and Mr. Dorman's task of approving police reports. Mr. Dorman further alleges that Chief Prickett's actions were influenced by Mr. Gordon and Mr. Dorman speaking with Mr. Garrett about their concerns.

This investigator understands Ariana Isom was formerly a corporal in the Florence PD. Ms. Isom worked for the Florence PD for approximately two years. Ms. Isom previously worked for the Colorado State Patrol before she was hired at the Florence PD. This investigator understands that in March 2021, Ms. Isom was placed on the Brady list.² This investigator understands Ms. Isom was placed on the Brady list for actions which occurred when she was an employee of the Colorado State Patrol, not the Florence PD. This investigator understands the District Attorney's Office for the 11th Judicial District made the decision to abstain from prosecuting cases where Ms. Isom was the charging officer. Moreover, this investigator understands that on February 5, 2022, Chief Prickett consulted with City Attorney, Matthew Krob, and was advised that the City of Florence would no longer prosecute cases in municipal court where Ms. Isom was the charging officer. Upon receiving this information, Chief Prickett made the decision to remove Ms. Isom from actively engaging in law enforcement activities and moved Ms. Isom into an administrative role. Subsequently, on February 7, 2022, Ms. Isom resigned from the Florence PD. This investigator understands that on February 8, 2022, Ms. Isom emailed Ms. Cobler and raised several concerns regarding Chief Prickett's conduct towards her. Specifically, Ms. Isom's allegations against Chief Prickett are as follows:

- (5) That on February 5, 2022, Chief Prickett sent Ms. Isom an email that unjustifiably stated she was no longer working that night as scheduled, that she was to turn in her patrol vehicle, that she was to turn in her keys and equipment, and that she was being placed on light duty in the front office.
- (6) That on February 7, 2022, after Ms. Isom submitted her resignation to the City of Florence PD, Chief Prickett unjustifiably disabled Ms. Isom's employee email.

Investigator Findings

The Finding section identifies the pertinent issues, followed by identification of specific sources of information from employees and the managers. Investigator commentary follows to develop specific areas of concern, address credibility assessment, or provide other subjective comment. *For a comprehensive understanding of the issues presented here it is recommended that each*

² The Brady list is a public database that contains information on police officers who have engaged in police misconduct.

summary statement be reviewed individually. Unless otherwise noted, all information quoted below comes from the summary statements.

Allegation 1: Mr. Vinelli alleges that on February 5, 2022, after Mr. Vinelli raised concerns to city council about police officer pay, human resources, and security issues during a public meeting on January 27, 2022, Chief Prickett emailed Mr. Vinelli and unjustifiably requested that Mr. Vinelli turn in his patrol vehicle and equipment; that Mr. Vinelli's law enforcement services were no longer needed; that Mr. Vinelli was not to show up at the department in uniform; and that Mr. Vinelli was to come through the front office entrance of the police department. Mr. Vinelli further alleges that Chief Prickett's actions were influenced by Mr. Vinelli's raising of concerns to city council.

Supporting

Information: Mr. Vinelli states: "... On January 14, 2022, Chief called me and said, 'Hey did you hear anything about me being under investigation?' [Chief] said the Interim-City Manager, Sean Garret[t], told him he was under investigation by the council. That Sunday, Chief and I went to the Chief's Conference in Loveland, Colorado. Chief and I took separate vehicles. Chief and I talked about what the investigation could be about. The next week, Chief and I met for breakfast. Chief told me he did not know what was going on."

Mr. Vinelli adds: "While I was at the conference, the officers were calling me with concerns with their pay increases. The officers were supposed to receive a 4 % raise; however, the officers only received a 2 % increase in their pay. For some officers, this equated to a forty-cent raise."

Mr. Vinelli continues: "Several officers felt the raise was a slap in the face. I told Chief maybe we should request an executive session with Council and figure out why there was not a 4 % raise. I called Matthew Krob, the City Attorney, and I told Matthew what was going on. My understanding is Sean Garret[t] made the decision to give the 2% raise. Matt informed us how we go about requesting an executive session. I told Chief about my conversation with Matt [Krob]. Chief said, 'Let's do that.' So, I requested an executive session. They session was supposed to be on [a] Thursday night. However, the session did not happen. Therefore, I had to blurt the concerns out during a public meeting. Someone recorded me. I was upset we could not have this meeting in private. During the public meeting I stated people were going to leave. The news media got a recording of me during the public meeting. A reporter called me and stated she received a recording of the public meeting. Chief told me, 'Let's do this.' So, I told the reporter I could talk to her. I provided the reporter with answers. The reporter ended up pulling a picture of me and ran it on the news."

Mr. Vinelli adds further: "The following Monday, I was frozen out of the Police Department. Chief would hardly speak to me. That was my last week. I submitted

my resignation on January 27, 202[2], and my effective end date was supposed to be February 9, 202[2]. Wednesday rolled around, and Chief talked to me. Chief said Sean Garret[t] accepted my resignation, but Sean Garret[t] wanted me to leave tomorrow. I told Chief that would not work. I had a lot of things still going on. Chief sent Sean Garret[t] an email. Chief said Sean said I could stay till next Wednesday, but no funny business. I worked a DUI shift Friday night, February 4, 202[2]. On Saturday morning of February 5th, I got an email from Chief where he directed me to turn in my patrol vehicle, to come through the front door of the department, and to not wear my uniform. Chief also stated my law enforcement services were no longer needed. I did not respond to Chief's email. I had five days left until my last day. I took sick leave for the rest of the time. It felt hostile. I have no blemishes on my record. I could not figure out why this was happening."

Mr. Vinelli contuse: "Sean Garret[t] told me he never directed Chief to have my employment end before my final day. Chief allocated the blame to Sean Garret[t]. I believe it was Chief's decision to freeze me out of the department. I think this was Chief's response to me talking during the public meeting. I do not regret telling the truth. I do not understand why Chief did this, as Chief one hundred percent advised me to discuss these concerns."

Mr. Vinelli concludes: "I submitted my resignation on January 27, 2022, to the Council during [a] public meeting. I was going to take the Chief job in Morrison, Colorado. The council refused to hear me in a private setting. I turned in my resignation to the council because they were available. I would have resigned regardless because of my job offer in Morrison. I wanted to stay in Florence, but I did not feel I could. My last day was supposed to be February 9, 202[2]. My last day turned out to be February 4, 202[2]. I received Chief's email the next day. Chief never explained to me why he made this decision. Chief stated to the media this was standard exit strategy. I have been involved in four resignations, one guy worked up until his last day in his uniform and [he had] his radio. Chief's explanation to the media was not common practice."

Mr. Dorman states: "I believe on January 7, 2022, I spoke with Deputy Chief, and Mr. Garrett came by and asked how everything went. Between the January 26th and [January] 28th, Deputy Chief was set to meet with Council in an executive session. Per the city attorney, Deputy Chief was advised to do this. Deputy Chief was informed that city council was not going to address these issues, and he needed to speak to Mr. Garrett. Deputy Chief informed Council that some of the issues he wanted to discuss concerned Mr. Garrett. Bill resigned to city council [effective] February 9, 2022. Bill told me he was going to address city council during [a] public session on February 7, 2022. This is an open session to the public."

Ms. Isom states: "I do not believe Chief's directive that me and Deputy Chief not have access to the building, and to dress in plain clothes was a common exit

strategy. Deputy Chief was still taking calls the last few days he was working, but he was advised to leave early.”

Ms. Isom adds: “I know of one officer who put in his two weeks, Brian Herrera, and he left in April. Brian made the decision not to finish his last two weeks, but he was not going to be restricted in any way. I heard from Deputy Chief and Sgt., Dorman that when Brian Herrera put in his resignation, he was still going to be working his 4:00 PM to 2:00 AM shift until his two weeks passed.”

Mr. Gordon states: “Deputy Chiefs last day was supposed to be on 2/9/22. Deputy Chief had a meeting scheduled with catered lunch for his last day. The lunch was to be provided by two individuals who donate to the department. Deputy Chief received an email from Chief telling him his law enforcement services were no longer needed, and that he needed to turn in his patrol vehicle by 5:00 PM. The email stated Deputy Chief could stay until 2/9/22, but he would be in plain cloth[e]s and come through the front door, which is the public entrance. This email exit plan was not standard practice for an officer leaving the department in good standing. For instance, even Chief’s wife was given access to the police entrance. Chief has afforded other people who have left the department in good standing access to the police entrance. Chief has allowed others to turn in their equipment on their last day. It is an iconic thing to let an officer call off duty for the last time. Yet Deputy Chief was being treated differently.”

Mr. Gordon concludes: “I have an email from 2/5/22, it states when people leave, our call signs change. One of our officer's call signs changed. This officer was never informed of this change. On 2/7/22, Chief sent dispatch an email that said, ‘Please remove Deputy Chief from your system as he has left for a new job.’ Chief also had Corporal Isom removed. This should not happen until an officer's last day. Chief made these changes before Deputy Chief and Corporal Isom left.”

Statements relating to all allegations in support of differential treatment by Chief Prickett:

Mr. Dorman states: “On January 31, 2022, I met with Mr. Garrett to follow up about the January 5, 202[2], meeting we had. I informed Mr. Garrett that communication had not improved. I informed Mr. Garrett I wasn’t aware that we had an Interim-Human Resources department, and that this had been in place since September 2021. Mr. Garrett told me that he informed Chief about their being an HR department. I spoke with other officers who were also not aware there was an HR department in place since September 2021. Mr. Garrett was upset about this. It should be noted that I recorded my last meeting with Mr. Patterson on July 21, 2021. I also recorded the two meetings I had with Mr. Garrett on January 5th and January 31st. The reason I recorded the meetings is because I could not trust Mr. Patterson. I wanted to make sure everything was above water from that time forward. I started my recordings a minute before the meeting took place and a

minute after the meetings end. No one was informed that there was a Human Resources department. It is discouraging to learn that there was an HR department for almost a quarter of a year, yet no one was told about it.”

Mr. Dorman adds: “I was advised on 1/31/21 that Matthew Krob, the City Attorney, was notified that Jessica Hill filed a lawsuit. Ms. Hill was the City Clerk. On 2/2/22, Deputy Chief Vinelli informed me that an officer spoke to Chief and advised him that there was a hostile work environment between Officer Susan Barnes and Corporal Isom. A decision was made, and I am not sure who made the decision, but Officer Barnes was to come to talk to Chief Prickett and Lori Cobler, and Officer Barnes was given the day off. Deputy Chief told me [that] Officer Barnes called him when Chief was in Deputy Chief’s office. Officer Barnes stated there was not a hostile environment, but that she had concerns she wanted to discuss with command staff. Officer Barnes also stated that HR was not needed. The meeting still took place. I know this because Officer Barnes told me. I did not ask about this. That was none of my business. On 2/4/22, Officer Barnes came to me and told me she had a conversation with Chief and Lori Cobler. Officer Barnes stated she was questioned about other things. Deputy Chief was present for this. Officer Barnes was asked if officers were having ride alongs. Officer Barnes asked Chief about Garrity because she was being questioned. Officer Barnes said Chief dismissed her concerns. The only person I am aware who... did ride alongs, from the City Administrative side, was Ms. Hill. Ms. Hill used to go on ride alongs with Deputy Chief. Officer Barnes stated Chief told her that she did not need to be at city council meeting on 2/7/22. I told officers that Deputy Chief was going to address council at an open forum, and if any officers wanted to, they could attend and discuss their concerns. We never told anyone they needed to be there. Officer Barnes stated Chief told her not to attend, because he did not want any funny business, and he felt there was going to be a walk out. I never received an email from Chief about this.”

Mr. Dorman continues: “That same day, Deputy Chief sent out an email about a mandatory training on 2/9/22, and there would be a catered lunch. We all knew this was Deputy Chief’s last day.”

Mr. Dorman adds: “I resigned due to all of this. Except for email, all communication from Chief had stopped. We only have fourteen officers in the department. Again, communication is supposed to be two ways. We could not discuss anything.”

Mr. Dorman continues: “I would return to the department if Chief Pricket[t] was no longer there. This is my dream job. I took a \$10.00 an hour pay cut to take my dream job. I had a really good career. I made detective within two years. I worked two years as a narcotics detective. I went back to the streets and made sergeant. My jacket is completely clear. I have no write ups. My reviews are majority excellent. I went to the highest place I could to resolve these issues. I wanted to be

the voice for people who did not have one, and I saw the sergeant role as my way to make a difference inside. As a sergeant I could ensure people were treated equally.”

Mr. Dorman concludes: “I felt I was subjected to issues, and I could not stay any more. My family had an intervention with me. I could not see how all of this was impacting me and, and that I was bringing this home.”

Ms. Isom states: “In regard to communication, Chief would communicate through email. When anyone would ask to talk about his emails, Chief would say there was nothing to discuss. Chief’s communication is not good. The only person Chief really communicated with was Deputy Chief Vinelli. The only way Chief communicated was through email.”

Ms. Isom adds: “When I was working for the Florence PD, I did not feel there was divisions in the department. However, I do now though. It felt like it was Chief’s side, or Deputy Chief’s side at the end.”

Ms. Isom continues: “Officers all had concerns. Everyone wanted the department to go in a good direction, then all of a sudden all this happened.”

Ms. Isom adds: “I believe officers spoke to city council and the city manager because there was a point when Chief would not talk about things. Like Chief’s directives email. I think if Chief would have discussed things, it would have gone smoother. As far as pay raises, that still would have gone to the city manager. Chief could have explained to us what his email about the 2022 directives was about. Chief also could have explained why he decided to change our schedules to 12-hour shifts. If Chief would have let the supervisors know, they could have disseminated this information to the other officers.”

Ms. Isom further states: “There was supposed to be a supervisors’ meeting every Wednesday. The meetings I went to, Chief was never present. I went to maybe four of Five meetings, and I was informed that Chief did not need me going to those meetings because the sergeants could advise me on those meetings. In the last four months, there has not been a single supervisors’ meeting. There were underlying circumstances. I know Chief was never at the meetings I attended.”

Mr. Sacketts states: “There is no communication with Chief. When I was promoted, I did not talk to Chief. When I was hired, I did not speak to the Chief for months. Chief has told us in meetings we are doing great, but then he will send an email telling us we are doing a bad job. The communication only comes in the form of, ‘I am the Chief, and this is how it is going to be.’”

Mr. Sackett continues: “Someone complained about the lack of communication regarding the departments’ pay raises, and Chief lied to us about what was going

on. The second there is confrontation, Chief switches the agenda to benefit him or he places the blame on someone else.”

Mr. Sackett adds: “Two months into this job is when I started seeing issues with leadership. There were things that needed to be done above the Deputy Chief’s level that were not getting done. I am one who goes out and chases drug dealers. My position brings the most liability to the agency. There is a propensity for violence and a propensity for people to get hurt. There are a lot of things that can happen. If I was Chief, I would be embedded with my job. I need support from command staff. I would like to know I have Chief’s backing. There is high likelihood of someone getting hurt. When I left the Sheriff’s Office and came to Florence [PD], I hit the job hard. I did not hear from Chief for months. Chief does not know about high level search warrants. Chief would not be able to adequately supervise someone else in my role. I have been a cop for ten years. I was a supervisor in Fremont County. I supervised four officers who were extremely aggressive in disrupting criminal behavior. Chief is not the type of leader who would know how to supervise the job I do.”

Mr. Sackett adds further: “I have seen Chief act vindictively. Particularly in his emails. There was an incident between me and another officer which was brought to Chief’s attention. I would not say Chief is vindictive, but I have heard rumors. I have seen firsthand a lack of understanding.”

Mr. Sackett continues: “There is a division in the department. It is not about sides. It is about doing the right thing. Business is business. There is nothing wrong with Chief being friends with Sgt. Humphrey. However, Sgt. Humphrey is not capable of doing his job. Sgt. Humphrey was promoted after being demoted just months prior.”

Mr. Sackett further states: “Officer Amanda Winters should have been fired. When I was promoted, Officer Winters went around asking a lot of questions about me. Officer Winters also spread rumors about me, and she became a cancer. This was brought to Chief’s attention, but he condoned her behavior. Officer Winters was caught lying about things. There was an alliance formed between Officer Winters, Sgt. Humphrey and Chief Prickett. There should not be alliances in the department.”

Mr. Sackett adds: “I was not a part of the leadership meetings. Chief informed Deputy Chief and the Sergeants that my attendance was not needed, and that the sergeants could relay the information discussed in the meetings to us.”

Mr. Sackett continues: “You would not be talking to me if there was effective communication and proper research on how things are supposed to be done according to the law. There would not be issues if there was leadership and communication. The department does not have a leader. We have someone who is

just here. Chief is not the best person for the job. Chief got this job because he blackmailed his way into it. I can see the agency disbanded because of how Chief is doing things. This is not good for anyone.”

Mr. Sackett concludes: “I have concerns that the stress issues in the department will become a liability for the department. We do not know if we are going to be out of a job, we do not know if we are going to be stripped of our duties. It is very stressful.”

Mr. Gordon states: “I was not aware that Lori Cobler was our HR. I found out there was an HR department through the media. Chief should have told us that Lori Cobler was our HR. Once I knew we had an HR, which was on 2/7/22, I sent Ms. Cobler and Mr. Garret[t] an email and expressed that I felt there was retaliation, and that Corporal Isom and Deputy Chief were being treated unjustifiably from everyone else. We scheduled a time to meet. Ms. Cobler reached out to me, and we met on 2/7/22. Ms. Cobler, Mr. Garret, and I met at a restaurant. During the meeting, I expressed to Mr. Garret[t] and Ms. Cobler that there was a lack of leadership in the department, a lack in communication, and that officers were fed up and were going to leave the department. I expressed to Ms. Cobler and Mr. Garret[t] nothing was being done, and that I was ready to leave. I told Ms. Cobler that coming to work makes me sick. That I do not want to come here anymore. Before all of this, I loved coming to work. This has caused me stress, and it has impacted my home life. I do not know what is going to happen next. I cannot actively do my job. I feel if I get into a situation where I must use force, I will not have Chief’s support. I believe Chief would use any opportunity to get rid of me. I was asked what I felt needed to be done. I told Ms. Cobler that if Shane Prickett is to remain Chief, officers are going to continue to leave, and I stated there needs to be a change in leadership. On 2/8/22, I was advised there was going to be a third-party investigation. I was informed Chief was told about the investigation. My administrative rights were given back to me after 2/8/22. I still am not working on the schedules. I still am not approving reports. I still do not have administrative rights to the body camera system. I cannot view my subordinates’ body camera footage. As of right now, I am not sure what I am supposed to be doing as a supervisor.”

Mr. Gordon adds: “Sgt., Dorman recently resigned because he could not physically handle the stress. I am honestly at that point too. I would leave if I could. The only thing keeping me here is my financial needs. Therefore, I have to endure this every day. Sometimes the stress makes me physically ill. This is impacting my job.”

Mr. Gordon continues: “Except for closed door meetings with a few individuals, Chief has made no effort to speak with anyone in the department. Chief does not meet with the sergeants to explain why our duties were taken away. I was never told I was not doing my job.”

Mr. Gordon further states: “On 2/5/22, Chief sent out an email to the department and stated he was creating a new commander position. Florence Police Department has never had a commander position. The employee handbook does not [provide] a job description.... In the requirements, Chief stated the commander will oversee sergeants, [the] School Resource Officer, and will approve reports. This indicates the sergeants will never get their duties back.”

Mr. Gordon adds: “I submitted a letter of interest for this position. I emailed my letter of interest to Chief. Sgt. Humphries and I are the only two officer who submitted our interest in the commander position. In his email, Chief did not state what the process would be. Chief only stated we should put in our interest by 2/11/22. I brought concerns to Ms. Cobler and Mr. Garret. I told Ms. Cobler and Mr. Garret[t] that I was not going to be chosen, and I was not going to be afforded a fair opportunity. I also stated that I believed the position was going to be given to Sgt. Humphries. Yesterday, 2/15/22, Chief sent out information that stated after careful consideration, he selected Sgt. Humphries as the new commander. Unlike everything else, there was no process. For instance, when Sgt. Dorman and I became sergeants, there was an interview process with four people. Chief’s selection of Sgt. Humphries was all based on his personal opinions of Sgt. Humphries. Chief did not ask for resumes. Chief picked who he wanted. In some way, Chief has displayed his bias, and retaliation. I sent Ms. Cobler Chiefs letter. I have no problem not getting a position when there is a proper process. If there was a promotion board, an interview process, I would have no problem.”

Mr. Gordon concludes: “I believe Chief wants to demote me. I believe if Shane Prickett remains the Chief, he will strip me of my sergeant stripes. Chief told Officer Barnes he was going to do this. Officer Barnes told me and Sgt. Dorman this. There is no reason why I should lose my rank. I have never been told I am doing my job wrong. I have felt this way since my first complaint to Mr. Patterson.”

Refuting

Information: Chief Prickett states: “On January 25, 2022, Deputy Chief Bill Vinelli tried to have an executive session with city council. Bill wanted to discuss pay issues. I learned about the issues Bill wanted to discuss because they were put on the news. Most of the issues Bill brought up were petty. Bill complained about the security of the building, he complained about pay, and he complained about a camera that was out. Everything Bill brought up was already being addressed. I did not feel comfortable with Bill bringing all this up, however, Bill was told he could call an executive session. I could not say no. That night, Bill was on the news. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Chief Prickett adds: “Bill accepted the Chief of Police position with the City of Morrison. I believe Bill put in for the Chief position in Morrison last July. Morrison contacted Bill in October. Bill was meeting with Morrison and negotiating a contract. I was informed by one of my lieutenants back in January that Bill was going to start at Morrison in February.”

Chief Prickett continues: “City council decided they would not have an executive session with Bill. Bill was upset and basically threw them his resignation. Bill gave me his resignation letter less than a week before he was going to leave. Sean Garrett and I met to discuss Bill's resignation. Sean stated to me maybe we should just let Bill go immediately. I said to Sean that we should let Bill finish out until his resignation date, Feb[ruary] 9, [2022]. Bill had [plans] to have a catered lunch, and [he] wanted to say goodbye, so I was okay with him staying. At this time, I still thought Bill and I had a great relationship. Bill and I talked about collaborating on things when he moved to Morrison.”

Chief Prickett adds: “I sent Bill an email about his exit strategy on February 5, 2022. We had a truck that needed to go into the shop. I told Bill to turn his truck in. I told Bill to take off Monday like he always did, and to work his normal hours. Bill was to use those days to clean out his office and return his equipment. I did not want Bill to have to do all of this on his days off. I told Bill not to wear his uniform so he would not be involved in an incident that would result in him having to go to court. Bill apparently took that harshly. Bill showed up to a council meeting on February 7, 2022. Bill started off by telling city council and citizens who were present that everything was fine, but he could not continue to work here because he was being forced out, and that I, as the Chief, was not supporting anyone, and that I send horrible emails. I did not force Bill out. Bill left all on his own. Bill acted like he had no choice but to leave.”

Chief Prickett continues: “One of the things Bill brought up was the security around the building. When Michael Patterson was terminated, city council wanted the door locks changed. This was already in the works. The Monday morning of the council meeting is when I received a key to the locks that were changed. Bill

was leaving the department, so I did not see the need for him to have a key for his last 2 days. I thought Bill could come in the front door, and it would be no big deal for Bill to come in through the front.”

Chief Prickett concludes: “Sean Garrett asked me if Bill was covering a shift. Bill was coming in at 6:00 AM to cover shifts. We did not want him to leave yet as he was covering the schedule. Sean Garrett called me into his office. Sean said they were going to accept Bill's resignation immediately. Bill had just submitted his resignation to city council, and Bill said it did not count since he did not give his resignation to me. I went to Bill's office, and I told him that Sean was accepting his resignation. Bill went over and talked to Sean. I told Bill that Sean wanted to accept his resignation immediately. Bill told me he planned to finish out and that he had plans to have lunch catered. Bill wanted to stay on until his resignation date which was February 9, 2022. Bill emailed Sean and he copied me on it, and said he was requesting to stay on until February 9, 2022. It was Sean's idea to have Bill's resignation take effect immediately. Bill was not frozen out of the department, he resigned. Bill said he was being left out of decisions. Bill was leaving, so his opinion no longer mattered here. I believe Sean wanted to accept Bill's resignation on February 2, 2022. I am not sure why Sean wanted to accept Bill's resignation immediately. I cannot remember what the dynamic was. Yes, I did instruct Bill to turn in his vehicle and equipment in on February 5, 2022. My email was standard housekeeping and an exit strategy.”

Ms. Barth states: “I believe Deputy Chief's email was taken down the day after the Council meeting when he resigned. I think Chief removed Isom's and Deputy Chief Vinelli's email access at the same time. When Deputy Chief Vinelli was at the city council meeting, we assumed he resigned that night. Deputy Chief Vinelli handed Chief his badge. Deputy Chief Vinelli had cleared everything out of his office. Chief was going to let Deputy Chief Vinelli finish out, but he was supposed to turn in his vehicle and clear out his office. That was also during the same time that we were changing the door codes.”

Mr. Garrett states: “Bill Vinelli submitted his resignation to city council after a special meeting on Thursday January 27, 2022. I was notified the next day of the resignation the next day which was a Friday of his resignation. The Chief and I had an in-person conversation in his office about the submittal and the Chief spoke with former Deputy Chief as did I later that day, he stated that he was upset and that he did not wish to resign, and he wanted to retract it.”

Mr. Garrett concludes: “The following week, ... January 31st [through] February 4th, I was working from home, as I had COVID. The former Deputy Chief gave his resignation to the Chief. The Chief and I had a conversation over the phone with the Chief. The Chief said he would like to make that Thursday Bills last day. This would [have] be[en] a week sooner than on [Mr. Vinelli's] resignation letter. The Chief was the individual to bring it up. I had no issues with this and reasonably

agreed to get it over with. I had received an email Bill asking for the original date (February 9th,) as he wanted to finish some things up. I also had a phone conversation with the Chief via phone and stated I had no issues and finishing up the items would be a good thing. [We] agree[d] that [Mr. Vinelli's] resignation should be sooner. It was Chief's idea that Deputy Chief's resignation take effect immediately. This was something Chief [recommended]."

Mr. Ingle states: "In regard to Bill Vinelli's statement that he was frozen out of the department, if I were Chief, I would have suspended Bill Vinelli and initiated policy violations right away. However, we were missing a city manager and there was no one above us to go to. I would have sought termination. With all the circumstances, it did not go this way. I would not characterize Bill Vinelli as being frozen out. Bill Vinelli was asked to turn his stuff in. Bill Vinelli put in his two weeks, and he resigned. Chief was going to let him finish out until his resignation date. Chief was angry. Bill Vinelli stabbed him in the back. Chief sent out an email and told Bill Vinelli he could turn his stuff in. The locks were being changed on the doors because of Michael Patterson. As far as Bill Vinelli not being allowed at the police department, that was not the case. Bill Vinelli was expected to work until his resignation date."

Refuting statements relating to all allegations in support of differential treatment by Chief Prickett:

Chief Prickett states: "In 2019, I put in for Chief of Police position, as did Bill Vinelli and Patrick Slattery. After we put in for the Chief position, all of us went through a selection process. Patrick Slattery was not qualified, so he was eliminated from consideration. Bill Vinelli really wanted the Chief position, as did I. Bill and I both worked for [a] former Chief who was miserable to work for. The former police chief would call us vulgar names and bash the officers. Our former Chief was terrible to work for. I was ready to move away from that. I recall one night the applicants [spoke] to the public, and a few people told me to watch out for Bill Vinelli because he wanted this job. Bill and I had worked together for several years. I thought Bill and I had a great relationship."

Chief Prickett adds: "When I was made chief, the city told me Bill was going to be [the] deputy chief. We never had a deputy chief before this. I did not get a say in who was going to be selected my second-hand person. I thought Bill and I had a good relationship up until January 2022."

Chief Prickett continues: "On January 3, 2022, I noticed there was a big problem in the department. Councilman Allen was hyped up and wanted to know why I was not going to hire two officers. Councilman Allen stated that someone told him that I was not going to hire two additional officers like Council had approved. I told Councilman Allen that it was the first business day of the fiscal year, and this was the first possible day I could have hired someone. The other issue was that I

did not have any applicants at this time. I assume someone was feeding him information. I was being blamed for not hiring two people in the new budget year.”

Chief Prickett adds: “The second thing that was brought up was my son was hired as an Administrative Assistant here at the Florence Police Department. When we were talking about hiring someone to help in the front office, Lori Cobler, Sean Garrett, and Nancy Barth all met and discussed who they wanted to hire. Lori Cobler, Cortlyn, and Sean Garret[t] stated we needed another person to help in administration. A lot of people we had hired had ended up leaving. The last person left because of Michael Patterson. There were three applicants for the position. I stayed out of the process because my son was an applicant. Without my input, they ended up hiring my son, as well as another person. I was told since I was related to my son, I could not supervise my son. I was told Bill Vinelli would my son's supervisor. I had nothing to do with that decision. I had nothing to do with my son's supervision. Sean Garret[t] had me sign a paper waiving my supervisory ability on my son.”

Chief Prickett further states: “I promoted two officers to sergeant: Jason Dorman [and] Michael Gordon. Dorman and Gordon would sit and talk with Bill all day in his office. They would go to lunch together all the time. Michael Patterson, who was still the city manager at the time, had an issue with what he called the ‘Office Party.’ Michael Patterson was referring to Bill [Vinelli], Jason Dorman, and Michael Gordon. Michael Patterson told me multiple times he wanted that to stop.”

Chief Prickett continues: “In December, Lori told me Bill was going to Michael Patterson and negotiating pay for some of the officers. Lori and I realized Bill advocated for Jason Dorman and Michael Gordon to receive a pay boost. This resulted in Dorman and Gordon making more money than Sgt. Humphrey. We ended up having to provide Sgt. Humphrey with backpay. All of this was being done behind my back.”

Chief Prickett adds: “The day after Bill left, Dorman also put in his resignation. Dorman told a detective that his heart just was not in it anymore. Dorman wrote me a letter where he blamed me for his resignation. All I wanted was Dorman to do his job. Dorman was another one that Nancy Barth was afraid to talk to. No one was sad to see Dorman go. I knew Michael Gordon was a part of Bill's group.”

Chief Prickett continues: “When Bill left, I needed a secondhand person, so I put out a posting for a newly created commander position. I was looking for someone who had five years of experience at Florence PD, and at least 2 years of supervisory experience. There were three people who were qualified for that position. One was Jason Dorman, but he quit. Sgt. Humphrey and Michael Gordon both put in for the position. However, Michael Gordon had not been a supervisor for two-years, so he was not qualified. I also went through their activities from August till the end of the year, and the activity from this year. Humphrey has been

a supervisor for ten years. Humphrey had triple the activity as Gordon. It was obvious that Sean Humphrey was the most qualified. I heard Gordon complained about this. I wrote more tickets than Michael Gordon. Since Sean Humphrey was becoming the commander, I needed a new School Resource Officer to replace Sean. Amanda Winters and Michael Gordon both put in for the SRO position. I was surprised that Gordon put in for the SRO position. Amanda Winters put in her letter that she had experience as an SRO and that she had volunteered for over 15-years with children in the past. Amanda also included a letter of recommendation. In contrast, Michael Gordon did not have the experience Amada had. In a way the SRO position would have been a demotion for Michael Gordon, to a degree. After that, Gordon put in to be our taser instructor. Gordon found a class he could take in April that was in Cortez, Colorado. I told Sgt. Gordon to put in for it. I was going to make him the taser instructor, but Sgt. Gordon never got back to me, and he ended up putting in his notice. I heard Sgt. Gordon wanted me to deny him the taser instructor position so he could complain about me. I do not hold grudges. I believe bridges that have been burnt must be crossed again. I believe if people want to be angry that is on them, but that's not me. I treat people how I want to be treated."

Chief Prickett adds further: "Since Isom, Sgt. Gordon, Sgt. Dorman, and Bill Vinelli left, the employees stated they feel they can speak freely in meetings now. Since Michael Gordon has left, the officers have stated they are excited for our meetings. They feel they can speak freely and can finally receive trainings. Apparently, Bill Vinelli had denied everyone training except for his group. Since Bill left, I have three officers who are signed up for trainings. I believe I have my finger on the pulse of the department now, and everyone seems to be happier. I am covering a lot of shifts, and I am learning a lot about my officers. I am now learning there were a lot of things that were not getting done before. I heard during calls, Sgt. Dorman would call in from the office and tell the officers how to handle the situations without actually being on scene."

Chief Prickett continues: "I think all of this was so Bill Vinelli would be made Chief. One of the officers told me Bill wanted to be Chief Michael Gordon left an email on the scanner and in it he asked Lori why I was not put on administrative leave while the investigation was ongoing. My brother-in-law, Sgt. Dorman, actually told people that Bill Vinelli was eventually going to be made Chief."

Chief Prickett concludes: "I feel the culture of the department is better than ever now that Sgt. Gordon, Sgt. Dorman, Deputy Chief Vinelli, and Cpl. Isom are gone. Officers have expressed to me that they are happier now. Everyone feels they can talk freely. Officers are excited for our meetings. I think we had a few poison pills who had an agenda for Bill to be made Chief. I am hearing Sgt. Gordon, Cpl. Isom, and two former officers from Florence are going to work for Bill in [Morrison.]"

Mr. Wold states: "I have not personally experienced any retaliatory behavior from Chief Prickett. I have heard there were rumors that individuals in the department were going to the city manager and city council with issues. I heard rumors that Deputy Chief Vinelli and some of the sergeants were the people who were going to the city manager and city council. I do not have personal knowledge about this. No one has come to me with their concerns."

Mr. Wold adds: "There seemed to be a division in the department. Those on Deputy Chief Vinelli's side, and those on Chief Prickett's side."

Mr. Wold continues: "I have never had [an] issue with Chief Prickett's communication. No one has complained to me about this either. Chief Prickett has a different supervisory persona about him. Chief is not overly talkative. Chief will send text messages and tell us what he needs. I have never found Chief's communications [to be] offensive. I have had a lot of supervisors during my career. I think Chief Prickett has done a good job. It usually takes a chief a couple of years to take a hold of the department and have their style of supervision implemented. I have seen the transition from the prior chief to Chief Prickett. Chief Prickett has always communicated well with me. Chief Prickett will not tell me things in person often, but he will send me a text. Chief is not what I would call a task master, or someone who looks over his employees' shoulders."

Mr. Wold concludes: "My opinion is that I think part of the problem is that when Chief Prickett took over, he was friends with the officers in the department. I told Deputy Chief Vinelli and Chief Prickett that when they became supervisors, their friendships needed to be put aside. I told them that this was going to be tough, and they needed a professional distance between friends. Part of what I have seen is sour grapes. When Chief realized his role, people had a problem with it."

Ms. Barth states: "Certain people had said Chief Prickett was not honest. However, Chief is honest. These same people said Chief sent out wrong emails. I think Chief's emails were legitimate. Chief has always treated everyone equally. Chief only cares if people do their work. There was a group of people who never did anything while at work. This group of people was always in Deputy Chief Vinelli's office. I did report to Deputy Chief before he left. I could never talk to Deputy Chief because there were always the same people in his office. I think this group was trying to get Chief Prickett in trouble. Chief is a really nice man. Chief does not like conflict, and he is a good listener. The group I am referring to was made up of: Deputy Chief Vinelli, Sgt. Dorman, Sgt. Gordon, Cpl. Isom, and Jessica Hill. They were always in Deputy Chief's office, and they always went out to lunch together. From what I saw, there were certain things they were supposed to be doing, but they were not doing them. I was not involved in the police side."

Ms. Barth adds: "I am not friends with Chief outside of work. I have worked with him a long time. I worked with Bill Vinelli for five years. I liked Bill Vinelli. I

could see a pattern with Bill that I did not like. I knew who he was for a long time.

[REDACTED]

Ms. Barth continues: “Now that Sgt. Dorman, Cpl. Isom, and Deputy Chief Bill Vinelli are gone, everyone is getting a long better in the department. The department appears to be more comfortable now. It is nice now. I feel better about the police department now. Before, I always felt people were talking. The group did everything together. I was trying to work, and they were always in the back talking and laughing. I would get mad because they were not doing anything.”

Ms. Barth further states: “The atmosphere now feels like everyone is relieved. I thought I trusted Bill Vinelli, but he was always trying coax people into his circle. Right now, people appear happier. I think everyone is relieved Bill Vinelli is gone. I really think Bill Vinelli and his group wanted to get rid of Chief. I would have quit if Bill Vinelli was the Chief. When I hired a new girl (Payton) in records, Bill was up there every day talking to her. Bill did not act this way with anyone else.”

Ms. Barth adds: “We needed more people working in administration. For a long time, I was the only person in the records department. I talked to the previous Chief and the former City Manager, Michael Patterson about hiring an additional person for administration. Recently, there was a lot of stuff I needed help with on the admin side. We hired Mason [Prickett]. Chief had a meeting with Lori Cobler and Sean Garret. They called me into the meeting, and we were talked about hiring a records person. Lori mentioned there was a job analysis that was done last year, and she asked me if I felt I was not getting things done because I was too focused on other things. Lori suggested putting me back in admin and hire someone for records. It is Lori and Sean who made that decision. Chief and I were shocked in a good way. We thought it was a great idea. I do not think Mason was working here yet. Mason was hired first, and then we hired Danielle Fox.”

Ms. Barth concludes: “I think city council approved the hiring of two officers, but at the time of the meeting, Chief said he would hire an officer and then wait six months or so before hiring an additional officer. This is something Lori and Sean talked with us about in the meeting.”

Ms. Barnes states: “We had two factions of officers who believed in two different things. Each group had their own agenda. One faction lost, and the other faction is moving forward. The people who lost threw a temper tantrum and then left. That faction consisted of: Ariana Isom, Bill Vinelli, Jason Dorman, Joe Sackett, and Michael Gordon, who was kind of on the fringe. The problem is that when a small group of people break off into two warring factions, you are forced when there are

supervisors what you are going to do. I stayed out of it, as did Officer Winters. We just wanted to come in and do our jobs and stay out of the politics. Since I started here, there has been an overwhelming sense from others that Chief did not know what he was doing. For example, if Chief sent out an email, some of the superiors would not do the things Chief asked them to do in his email. Everyone I mentioned above was in the group who believed Chief was an idiot, and they were not going to listen to him. These are the people who believed they were only going to listen to Deputy Chief Bill Vinelli, and not Chief.”

Ms. Barnes adds: “I work nights, so I have not been involved in the communication part of it. It is my understanding, all hearsay, that communication was on going, then communication would break down, and then Chief would send out a scathing email. That was not my perception, as I was not there to perceive anything. I have received emails, but I do not know what came from that. I do not know the backstories of those emails. I received an email that schedules were changing, and that was just how it was going to be, and there would be no discussion. I do not know the backstory of that email.”

Ms. Barnes continues: “I know Chief has some kind of pet projects which are important to him. Chief would send out emails telling people to do their jobs. I know those directives were not getting done. Chief would follow up and send another email telling people again to do their jobs. My supervisors were Cpl. Isom and Sgt. Jason Dorman. Cpl. Isom was abysmal at best at supervising. Sgt. Dorman was also abysmal in regard to supervising Cpl. Isom. Sgt. However, Sgt. Dorman was great in supervising me. Sgt. Dorman communicated with well me. Sgt. Dorman was in the faction that was against Chief. I never personally had any problems with Sgt. Dorman. There were a lot of issues with Cpl. Sackett. The supervisor group allowed Cpl. Sackett to run amok. The Sergeants and the Deputy Chief allowed Cpl. Sackett to perform an integration on me. That group tried very hard to make sure Chief was not involved in anything.”

Ms. Barnes further states: “I have only been told Chief acts spiteful and retaliatory. I have never experienced this. When you have five people gunning for your job, I cannot imagine how someone could not be spiteful. I do not think it is retaliation when someone is trying to take back their department. I would characterize Chief’s actions as defensive. I believe Chief’s emails were a defensive measure. Telling people to perform patrol checks. Everyone was like, ‘Is Chief kidding?’”

Ms. Barnes concludes: “I think the problems in the department have been resolved. There are two people left from the faction, Sgt. Gordon, and Cpl. Sackett. Everyone is reeling right now. I am sleeping better and not worrying about coming into work as much as before. I got to the point where I was physically ill because I was stressed out due to the work environment. I believe Cpl. Isom was a big concern.”

Mr. Santiago states: "I have never experienced any retaliation from Chief or anyone at the Florence Police Department. I have heard Sgt. Gordon express concerns about retaliation. Sgt. Gordon told me there were things going on with Chief. Sgt. Gordon stated he put in for the commander position. but he was not made commander because Chief had retaliated against him."

Mr. Santiago adds: "Chief has never acted vindictive towards me. I personally have never seen Chief act in this way. I come to work and go to work. I cannot attest to anyone's behavior unless they do something in front of me."

Mr. Santiago continues: "I feel between Chief communicates efficiently with me. Chief responds to me in a timely manner."

Mr. Santiago adds: "I [don't] have concerns with anything in the department. I believe all the stuff going on is self-caused between Sgt. Gordon, Sgt. Dorman, and all the people who have left. I have worked with Chief for a year and a half, and I have never had an issue with him. I can walk into Chief's office and talk to him."

Mr. Santiago further states: "We are picking up the slack of the sergeants and the patrol officers who want to leave. It felt like mom and dad were getting divorced and the kids had to decide whose side to choose. Half the department chose a side, and the other half chose another side."

Mr. Santiago adds further: "Officer Isom and Sgt. Dorman are officers who were not doing anything. These officers were not doing their jobs. These are people who out of spite were not doing what they were supposed to be doing."

Mr. Santiago continues: "I believe if people have an issue with Chief, it is out of their own animosity. I have worked in law enforcement for ten years. This is not my law enforcement job. I believe Chief is effective in his role."

Mr. Santiago concludes: "Officer Barn[e]s was directly under Sgt. Dorman. Officer Barnes works the opposite of the week of me. I think Mike Ingle, Felix Montoya, Amanda Winter, and Sean Humphrey are all officer[s] who would have good insight to provide. The problems occurred because there was not a whole lot of structure. We have Chief, and we had Deputy Chief Vinelli. Deputy Chief allowed people to become comfortable and not do their jobs. People were allowed to be complacent. When Chief realized what was going on and lit a fire, there was an uproar because people were so used to not doing their jobs."

Mr. Garrett states: "When I first started, I was not aware of a division in the PD. But I soon learned there was a division in the PD. As I became the interim-[city manager], it seemed there was a split amongst those on Chief's side and those on

Deputy Chief Bill Vinelli's side. Part of this was based on Sgt. Dorman and Gordon leaning their support towards Deputy Chief."

Mr. Garrett adds: "I heard a comment that the sergeants were spending a lot of time in their offices. I do not recall when I heard that comment."

Mr. Garrett concludes: "In early February, Amanda Winters met with me, and Chief was present. Ms. Winters gave an outline of certain things, and she agreed communication could improve. Ms. Winters did not have issues with Chief or Deputy Chief, she suggested possible things to get everyone on track. There have been others who have sent email in support including Sgt. Humphrey and Nancy Barth. From what I have heard, the issues in the PD seem to have calmed down since Sgt. Dorman, Sgt. Gordon, Ariana Isom, and Deputy Chief Bill Vinelli have left."

Mr. Montoya states: "I am Felix Montoya, and I am a police officer with the Florence Police Department. I have worked as police officer since 2006. I began working with the Florence Police Department in April 2021."

Mr. Montoya adds: "I do not have any concerns with Chief Prickett. Since I started, Chief has always communicated with me. Chief asks me how things are going. Chief asks me if I need anything. Everyone I work with likes the Chief. Everyone speaks well of Chief. I have gone to Chief with concerns and my personal issues. Chief was understanding. Chief sat me down and talked with me. Chief has helped me out a lot. My personal opinion is Chief is a tremendous leader. Chief knows what he is doing. Chief is for his officers, he is not about himself. Chief is up there with the best leaders I have worked with during my time in law enforcement. Chief is always worried about his officers."

Mr. Montoya continues: "I report directly to the sergeants, but they are not there. I did not feel comfortable going to Deputy Chief Vinelli. I would have not had a problem going to Sgt. Dorman and Sgt. Gordon. However, Sgt. Dorman recently quit. I also can go to Cpl. Sackett."

Mr. Montoya adds: "I did not have any issues with the sergeants. Deputy Chief Vinelli did not treat me well. Deputy Chief never communicated well with me. Deputy Chief had his favorites. I have known Bill Vinelli for a while. Him and I have not seen eye to eye since 2006. Deputy Chief would give me the used equipment. For example, I told Deputy Chief [that] I needed a new vest, and it took him a while to get me one. I asked for a winter jacket, and Deputy Chief never got me one like I requested. Deputy Chief did not communicate well with me. I always put this out of sight and out of mind."

Mr. Montoya concludes: "Deputy Chief had favorites like Sgt. Dorman, Sgt. Gordon, and Cpl. Sackett. These are the officers Deputy Chief favored. Deputy

Chief would get them new equipment. I am never in the office. I am always in the streets. Maybe ten percent of my time is spent in the office. No one has ever talked to me about anything. I do not get involved in gossip. I observe that is all I do.”

Mr. Humphrey states: “I have never seen Chief Prickett act in a spiteful, vindictive, or retaliatory manner. No one has ever brought those concerns to me personally. I think there are a select few who have made complaints about Chief. Personally, I think Sgt. Dorman, Sgt. Gordon, Deputy Chief Vinelli, and Ariana Isom have it out for Chief. To me, it seems these four officers would always do everything together, such as going to lunch together, and they would only associate with their group.”

Mr. Humphrey adds: “Chief and I have known each other since kindergarten. I have worked with Chief for 18 years. Chief and I went to kindergarten, middle school, and high school together. I am going to be made commander in March. The commander position will replace the deputy chief position.”

Mr. Humphrey continues: “There seems to be a division in the department. The division was brought on by Sgt. Dorman’s, Sgt. Gordon’s, Deputy Chief Vinelli’s, and Ariana Isom’s group and no one else. The four always went to lunch together. There was an incident where a citizen was in the police department lobby for forty minutes waiting for an officer to respond, but the four officers were at lunch. Chief mentioned to them that not all of them could go to lunch together because we needed a supervisor on the road.”

Mr. Humphrey adds: “Chief communicates effectively with the officers. Chief usually provides directives through emails because it is the best way to send information out, as there are officers who also work nights.”

Mr. Humphrey concludes: “I do not think my relationship with Chief as anything to do with anything. I want this to be fair. I think there is a group who is retaliating against the group. I think Amanda Winters, Susan Barnes, Nancy Barth, Lt. Mike Ingle, and Daniel Santiago are all people you should speak with. These are the officers who reported to Sgt. Dorman, Cpl. Isom, and Sgt. Gordon.”

Ms. Winters states: “I came from an agency where there was a lot of underhanded comments. I experienced a lot of that in another agency I worked for. I experienced a hostile work environment in another agency, Fremont County Sheriff’s Department. There were a lot of grumblings certain individuals would share about emails. The grumblings were coming from Ariana Isom, Deputy Chief, Bill Vinelli, Sgt. Gordon, and Sgt. Dorman. Ariana Isom and Cpl. Sackett were brought into this. This was a core group of people. Cpl. Sackett never talked about the emails. However, Ariana Isom was on board with that. The group was upset about Chief’s emails and how they came out. I do not understand why Isom was upset because she came from Colorado State Patrol where a lot of information is passed

in the form of email. The previous department I came from, information was disseminated through email. Emails are difficult to interpret. I try to remember when I read emails, and I keep that in mind when I read emails.”

Ms. Winters adds: “I was never offended by Chief’s emails. I came from another agency, and I know Bill Vinelli came from the federal side. I was in the army, and I was an army wife, my perspective is a full world view. Never once did I take any of Chief’s emails as a terrible thing. Chief would point out when people were slacking in certain areas and where there needed to be improvement. Our sergeants should have explained the emails to their direct-reports. I did not understand the issue with the emails. Sgt. Dorman and Sgt. Gordon have only worked in the Florence PD, so this is all they know.”

Ms. Winters continues: “I feel I can bring concerns to Chief, and I can speak with Chief. I have spoken with Chief in the past. I do honor the chain of command, as I come from a military background. Recently, I had some questions and concerns, and I went straight to Chief and talked to him. Never once did Chief lie to me. Chief was open and told me I can talk to him. Chief did not mind me asking him difficult questions.”

Ms. Winters further states: “Chief is a loving and kindhearted. I have seen spiteful and vindictiveness, [but] never once have I seen Chief act this way.”

Ms. Winters adds: “When I first started at the Florence PD, it was a saving grace for me. I came to Florence, and I did not know all the things that were going on. When I started to open up and go to lunch with day shift, Sgt. Dorman, Sgt. Gordon, Ariana Isom, and DC. Bill Vinelli, and learn, there were moments where they would bad mouth Chief. I would ask them if they talked to Chief, and they would always say they have tried, but nothing ever changes. Sometimes they would say they tried, and things never changed. I started to clue in that they did not want anything to change, they just wanted to complain. I talked to my husband about this because it bothered me that they were talking about Chief like this. I would understand if Chief was doing something immoral, unethical, or illegal, but I have never seen anything like that. There is nothing to badmouth Chief about.”

Ms. Winters continues: “When the group would talk bad about Chief, I would try and change the subject. About a week and a half of me changing the subject away from Chief, the group learned I did not want to be a part of that stuff. I told Sgt. Dorman I understand that this is how he feels about Chief, but I did not feel the same way. Chief has been phenomenal. I was shoved out of their circle. I was not treated poorly, but they would bad mouth me behind my back.”

Ms. Winters adds: “I feel that group tried to undermine Chief. There would send emails to members of City Council. Bill Vinelli went on the news and bad-mouthed Chief. The most hurtful thing out of all of this is that Bill Vinelli is a

smart man, and I considered him friend. However, I learned what kind of friend Bill Vinelli was. Bill Vinelli went and spoke for me when I did not want him or ask him to. Bill Vinelli said on the news that ‘Officers,’ as in plural, which meant the four officers in the department, which made it seem like he was our union representative. I am a smart and capable woman. I never asked Bill Vinelli to speak for me. Felix Montoya, Daniel Santiago, and Susan Barnes, and I should all feel slighted, because none of us felt that way about Chief. Yet, Bill Vinelli misrepresented us in public. Bill Vinelli made it sound like everyone who patrols the street feels like Chief abuses us. When Bill Vinelli made it seem like we were going to up and quit because we were upset, this was a gross misrepresentation. Chief put out an email about covering shifts. The only sergeant who stepped up to help cover shifts was Sgt. Humphrey. Sgt. Dorman and Sgt. Gordon maybe helped out once or twice.”

Ms. Winters adds further: “There is a different feeling in the department now that Michael Gordon, Jason Dorman, Ariana Isom, and Bill Vinelli are gone. It would be even better if Cpl. Sackett left too. I would absolutely cover Cpl. Sackett if he needed it, but he was a part of that core group. Cpl. Sackett subjected me and Susan Barnes to a criminal interrogation. I had already worked for another agency in Freemont County. I was familiar with Cpl. Sackett and his reputation. I went to other sources and asked about Cpl. Sackett’s character. I had concerns about him coming to work in Florence. Cpl. Sackett was super pissed that I went to others and asked about him. I told Cpl. Sackett I wanted to talk to him and understand the information I was told. When I was talking to Cpl. Sackett, he told me as my supervisor if I did not tell him who I talked to, I could be in trouble and would be subject to legal ramification. Cpl. Sackett essentially threatened to fire me. I was not given a Garrity warning or offered one. Because I had confided in Susan Barnes about this, Cpl. Sackett said I was a, ‘Fucking Gossip,’ and this would not be tolerated in his department. When I took this to Sgt. Gordon. Sgt. Gordon listened to me, but he told me that I needed to trust my leadership. After that moment, Ariana Isom was allowed to treat me poorly in-front of all of them. Isom was completely unprofessional. I told Sgt. Gordon I did not feel comfortable working with Isom anymore.”

Ms. Winters continues: “There is a lot of hurt. I know a lot of us are hurt. I can tell you the department is night and day now that the group is gone. We had a family meeting with everyone, and the only people not there were Officer Santiago and Cpl. Sackett. The ones who were present felt great. We did not have people rolling their eyes at us. For the first time, everyone felt they could freely talk without being bad mouthed. It was a fantastic feeling. If anything, things are phenomenally better here. It is really unfair Chief is being drug through the mud over this nonsense. Chief is a fantastic leader. It is hard to watch this happen to Chief. Chief is working hard to cover shifts. Chief is working without taking days off.”

Ms. Winters concludes: “A good portion of the time, Isom, Dorman, Gordon, and Vinelli were always in the office hanging out.”

Mr. Ingle states: “I believe there are complaints directed towards Chief Prickett. I hired Chief Prickett seventeen years ago. I do need to emphasize that we had something happen here I have never seen in thirty years. Our Deputy Chief, Bill Vinelli, who I worked closely with for a long time, had some insidious intentions. I saw that Deputy Chief had a goal to knock Chief out of his position. Deputy Chief had other officers follow his lead.”

Mr. Ingle adds: “I have never seen any faults or issues with Chief. Complaints were made because of some of Chief’s emails. I also received those emails from Chief, and I did not have an issue with them. The complaints about Chief’s emails are a joke. The bottom line is this whole thing is about power. Bill Vinelli felt he could knock Chief Prickett out of his position. Bill Vinelli was reluctant to leave for the Chief position in Morrison. Bill Vinelli explicitly told me he did not want to go. I am standing up for Chief Prickett. I think Chief has been too kind and too soft. I encouraged Chief to stand up because these guys have been running around. Bill Vinelli had strong advocates in Sgt. Dorman, Sgt. Gordon, and to a lesser degree, Ariana Isom. I think Ariana Isom followed in that direction. There was a drastic change. I thought the world of Bill Vinelli, Sgt. Gordon, and Sgt. Dorman. I hired Jason Dorman. Chief Prickett is related to Jason Dorman.”

[REDACTED]

Mr. Ingle adds: “I think with Bill Vinelli, Sgt. Gordon, Cpl. Isom, and Sgt. Gordon leaving the department is going to be good for the department. They were like a cancer. Now that they are gone, there is a feeling of relief around the department. Michael Gordon has not left, yet. There is a change in this building, which is going to be positive. Every officer feels at ease those officers have gone. I do not know what others have told you, but we get together, and we all feel good that they are gone. Chief’s only fault is that he trusted Bill Vinelli. Chief found out these guys were going behind his back to the city manager and city council.”

Mr. Ingle concludes: “I have confidence in the future of this department with Chief leading it. Everyone in the department seems all be on the same page. Everyone is relieved that group is gone. That is what I am hearing and seeing. I adore this

department, I have given my blood, sweat, and tears to this department. I have no agenda. Chief is not my best friend. There is no ulterior agenda here.”

Comments: Mr. Vinelli asserts Chief Prickett acted unjustifiably towards him when Chief Prickett emailed him on February 5, 2022, and made a series of requests, which rendered his services as a law enforcement officer obsolete. In addition, Mr. Vinelli asserts Chief Prickett’s conduct was motivated by him speaking out against the Florence PD during a public meeting on January 27, 2022. There is sufficient evidentiary support to substantiate Mr. Vinelli’s assertion that his conduct of speaking out against the Florence PD during a public meeting on January 27, 2022, influenced Chief Prickett’s conduct.

As the evidence shows, there was a tumultuous environment at the Florence PD during this time. From June 2021 through February 2022, there were a copious number of complaints being brought to the city managers, and members of city council. These complaints were overwhelmingly being brought forth by Mr. Dorman and Mr. Gordon, both former sergeants of the Florence PD. The complaints transcended two City-Managers, Michael Patterson, and Sean Garrett. The primary crux of Mr. Dorman’s and Mr. Gordon’s complaints was that Chief Prickett would not provide effective communication.

The volatility in the Florence PD appeared to have reached its zenith on January 27, 2022, when Mr. Vinelli went before city council during a public meeting and openly criticized the Florence PD under Chief Prickett’s leadership. *See* Attachment 3. As the statements show, Chief Prickett was aware beforehand that Mr. Vinelli wanted to address concerns with city council during an executive session, however, Mr. Vinelli’s request was not granted by city council. Mr. Vinelli describes how he was transparent with Chief Prickett that he wanted to talk about the lack of a meaningful pay raise for the officers. Mr. Vinelli states he inquired from the City Attorney, Matthew Krob, what process he needed to follow to initiate an executive session with city council. Mr. Vinelli states Chief Prickett encouraged him to speak during an executive session when as Chief Prickett stated, “Let’s do that.” However, as Mr. Vinelli states, city council did not grant his request for an executive session, therefore, Mr. Vinelli believing he had no other choice, discussed the concerns during a public meeting on January 27, 2022. As the evidence shows, Mr. Vinelli made comments at the public meeting which gained media attention, as a local media outlet ran a story a day later on January 28, 2022, titled, *Florence police officers raise concerns about pay, HR and security, city responds*. *See* Attachment 37. At this point in time, issues that were presumably clandestinely kept internally within the confines of City of Florence, were being discussed out in the open for public dissemination. As Councilwoman Melissa Hardy states in the article, “After receiving legal advice it has been determined that the discussion items tonight are not... appropriate for [an] executive session, but are actually matters for the city manager to handle[.]” *See* Id. It appears Mr. Vinelli was not afforded much discretion in deciding when and

how to voice the concerns, as city council determined these matters were not appropriate for an executive session. To this investigator, it does not appear Mr. Vinelli methodically used the public meeting as a way to deceive Chief Prickett, as some in the Florence PD perceive. However, during the January 27, 2022, public meeting, not only did Mr. Vinelli discuss the pay raise issues, which he disclosed to Chief Prickett, but he also discussed the lack of human resources, as well as security concerns at the Florence PD, which included issues with security cameras not working. *See Id.* On its face, these concerns do not appear to be an indictment against Chief Prickett's ability to lead the Florence PD. However, as Chief Prickett states, he learned for the first time through the news some of Mr. Vinelli's concerns. This statement appears to demonstrate Chief Prickett was taken by surprise when Mr. Vinelli raised concerns about the lack of human resources and security at the Florence PD. It is also notable that during the public meeting, Mr. Vinelli provided city council with his letter of resignation, and as Mr. Vinelli states, his decision was predicated upon the fact he had been offered the chief of police position with the Morrison PD.

Mr. Vinelli states a week after the January 27, 2022, public meeting, Chief Prickett emailed him and essentially "froze" him out of the Florence PD. On February 5, 2022, Chief Prickett sent Mr. Vinelli the following email:

From: Chief Shane Prickett
Sent: Saturday, February 5, 2022 10:22 AM
To: Deputy Chief Bill Vinelli <bill.vinelli@pd.florencecolorado.org>
Cc: Mike Ingle <mike.ingle@pd.florencecolorado.org>; Nancy Barth <nancy.barth@pd.florencecolorado.org>; Sean Humphrey <sean.humphrey@pd.florencecolorado.org>
Subject: Status
Importance: High

Your services as an on duty law enforcement officer will no longer be needed up to your last date requested of February 9, 2022.

- Turn in your patrol vehicle today by 5pm with your personal items removed. (unit keys in my mailbox)
- You shall not return to the PD in uniform, but in civilian attire for your remaining 2 days.
- Your last 2 scheduled days, Tuesday, February 8 and Wednesday February 9 shall be from 7am to 5pm in plain clothes.
 - o Use this time to complete turning in equipment, clearing out your personal belongings, and transferring files / paperwork etc.
 - o Your department ID and keys shall be turned in to Mike Ingle upon your arrival on Tuesday, February 8.
 - o There will be no authorized persons allowed at BATTLE this Monday, February 7, 2022. (They have been notified.)
- For department security, you will come and go through the front office entrance of the PD after you turn in your keys.

I thank you for your service to the department and our community.

Shane Prickett
Chief of Police
Florence Police Department
600 West 3rd Street
Florence, CO 81226
719-784-3411

See Attachment 20.

As the email shows, Chief Prickett informed Mr. Vinelli his duties as a law enforcement officer were no longer needed up to his requested last day of February 9, 2022, and that Mr. Vinelli was to turn in his patrol vehicle on February 5, 2022,

that Mr. Vinelli was to wear civilian attire for his remaining shifts, and that for department security, Mr. Vinelli was to go through the front office entrance of the Florence PD after he turned in his keys.

Chief Prickett states on January 28, 2022, he met with Mr. Garrett to discuss Mr. Vinelli's resignation which he submitted to city council the previous day. Chief Prickett states during the meeting, Mr. Garrett stated they should let Mr. Vinelli go immediately, however, Chief Prickett disagreed and stated Mr. Vinelli should be allowed to finish out until his resignation date of February 9, 2022. Mr. Garrett opines he and Chief Prickett were both in agreement that Mr. Vinelli's resignation should take effect sooner, but it was Chief Prickett's idea that Mr. Vinelli's resignation take effect immediately. This is inconsistent with Chief Prickett's recollection of events, as he states it was Mr. Garrett who suggested Mr. Vinelli's resignation take effect sooner than February 9, 2022. This investigator understands that the ambiguity in the two statements could be the result of the amount of time that had passed between Chief Prickett's and Mr. Garrett's conversation on January 28, 2022, and the dates each individual was interviewed by this investigator in February 2022; however, the inconsistencies in the statements appear to be consequential. For instance, Chief Prickett states Mr. Garrett called him into his office, while Mr. Garrett states the conversation took place in Chief Prickett's office. In addition, Mr. Garrett discusses that he had two conversations with Chief Prickett in regard to Mr. Vinelli's resignation; the first conversation took place in Chief Prickett's office on January 28, 2022, and the second conversation took place a short time later over the phone sometime between January 31, 2022, and February 4, 2022. Mr. Garrett recollects this call was over the phone because he was at home with COVID. Mr. Garrett unequivocally and consistently states it was Chief Prickett who first proffered the idea that Mr. Vinelli's resignation take effect sooner; however, as Mr. Garrett states, with everything going on, both he and Chief Prickett agreed that it would have been best for Mr. Vinelli's resignation to take effect sooner than February 9, 2022. Mr. Garrett does not appear to harbor any bias or ulterior motives which would lead this investigator to question his credibility or veracity for truthfulness. This investigator finds Mr. Garrett to be the more reliable witness of the two. In addition, Mr. Vinelli emailed Mr. Garrett on February 2, 2022, and requested that his last day be on February 9, 2022, as he requested. *See* Attachment 18. This tends to show that there likely were two conversations between Chief Prickett and Mr. Garrett, and that the phone conversation took place shortly after Mr. Vinelli's email on February 2, 2022.

Moreover, this investigator found some of Chief Prickett's requests of Mr. Vinelli in his February 5, 2022, email suspect. For instance, although it was decided Mr. Vinelli would finish out on February 9, 2022, Chief Prickett made it clear to Mr. Vinelli he would not be conducting any duties in a law enforcement capacity. As Chief Prickett states in his email, Mr. Vinelli's services as a law enforcement officer were no longer needed until February 9, 2022. *See* Attachment 20. In addition, Chief Prickett informed Mr. Vinelli he would not be permitted to wear his uniform,

and he would need to enter the front door of the Florence PD. *See Id.* Chief Prickett's requests in essence rendered the last few days Mr. Vinelli's tenure pointless, as he would not be performing any duties as a law enforcement officer. Moreover, to this investigator, it appears Chief Prickett's decision that Mr. Vinelli was to show up to the department in civilian clothing lacked cogency, as it does not appear to this investigator that it served a legitimate business purpose. Chief Prickett explains that his decision was based on him not wanting Mr. Vinelli to be involved in a situation that may have led him to being called into court. This investigator does not find Chief Prickett's explanation persuasive. For one, if Mr. Vinelli were involved in a law enforcement activity which led the district attorney's office or the city attorney's office to subpoena him, this would have presented a burden on Mr. Vinelli, not the Florence PD. Second, witness statements from those who appear to be neutral witnesses indicate Chief Prickett was upset with Mr. Vinelli for divulging information during the public meeting on January 27, 2022. For example, Mr. Ingle states Chief Prickett was angry because Mr. Vinelli stabbed him in the back. Furthermore, as Chief Prickett states, he learned through the news about the concerns Mr. Vinelli raised during the public meeting. As stated above, this demonstrates Chief Prickett was taken off guard, and it also demonstrates Chief Prickett may have had a motive, as his deputy chief used a public forum to criticize the police department under his direct leadership.

In addition, this investigator found it notable that Chief Prickett requested Mr. Vinelli to come in through the front door and to wear civilian clothing. According to some of the witnesses, this was not the common exit strategy as Chief Prickett contends. Mr. Gordon impugns that Chief Prickett's instruction to Mr. Vinelli was not the standard practice for a law enforcement officer who was leaving the department in good standing. Mr. Gordon states in the past, Chief Prickett permitted other officers who left in good standing to turn in their equipment on their last day. In corroboration, Mr. Vinelli states he has been involved in other resignations, and one officer was permitted to work up until his last day in uniform, and the officer was allowed to use his radio. Ms. Isom corroborates Mr. Vinelli when she states another officer, Brian Herrera, left the Florence PD in April 2021, yet he was not restricted in any way. This investigator understands that Mr. Vinelli, Ms. Isom, and Mr. Gordon are all complainants, and therefore, their credibility is called into question, however, the ubiquity in their statements regarding officers who left the Florence PD tends to show Mr. Vinelli's exit was not in conformity with Chief Prickett's prior course of dealings. In addition, as Mr. Garrett and Chief Prickett state, at one point in time, they both agreed it would have been best for Mr. Vinelli's resignation to take effect immediately. As Mr. Garrett states, Chief Prickett felt it was best to get it over with. This demonstrates to this investigator that Mr. Vinelli was not leaving under ideal circumstances.

Given the circumstances presented above, this investigator finds it more likely than not that on February 5, 2022, after Mr. Vinelli raised concerns to city council about police officer pay, human resources, and security issues during a public meeting on

January 27, 2022, Chief Prickett emailed Mr. Vinelli and unjustifiably requested that Mr. Vinelli turn in his patrol vehicle and equipment; that Mr. Vinelli's law enforcement services were no longer needed; that Mr. Vinelli was not to show up at the department in uniform; and that Mr. Vinelli was to come through the front office entrance of the police department. In addition, this investigator finds it more likely than not that Chief Prickett's actions were influenced by Mr. Vinelli's raising of concerns to city council.

Allegation 2: Mr. Gordon alleges that on July 14, 2021, after Mr. Gordon and Mr. Dorman reported concerns with Chief Prickett to the City Manager, Michael Patterson on June 2, 2021, and July 6, 2021, Chief Prickett unjustifiably threatened to change Mr. Dorman's and Mr. Gordon's work schedules to 4:00 PM to 2:00 AM.

Supporting

Information: Mr. Gordon states: "The biggest concern of mine is retaliation and bias shown by Chief. My first complaint was made to the former City Manager, Michael Patterson on June 2, 2021. In summary, Chief was not performing his duties. Chief was not helping covering shifts, and he was not a working Chief. The biggest issue was his lack of communication, and the lack of equal responsibilities between me, Sgt. Dorman, and Sgt. Humphries. I was promoted to sergeant before my complaints."

Mr. Gordon adds: "The email Chief sent out was a big issue saying that no one was doing their jobs. Officer Gonzalez left the department because Chief notified him over email that he was not going to be promoted. I believe Chief's email was sent to Officer Gonzalez over a weekend. During this time, Officer Gonzalez's mom was getting ready to pass away. The lack of communication with Chief is what led to my first complaint. Mr. Patterson came up with the idea that I, Mr. Patterson, Sgt. Dorman, and Chief Prickett all met to discuss the issues. The discussion did not go well. We all sat at a table. Chief sat across the table from Sgt. Dorman and I. During the meeting, Chief was turned away from us and stared up at the ceiling. Chief appeared to not care about anything we had to say. During the meeting, it was decided the communication would improve. This included having weekly supervising meetings. Chief was supposed to attend those meetings. Chief is a supervisor, and he should know what is going on. Subsequently, there was a supervisors' meeting, and Chief stated he was going to keep minutes."

Mr. Gordon further states: "The biggest thing about the meeting, which Deputy Chief, and Sgt. Dorman were present for, is that Chief stated we were no longer allowed to go to the city manager. Chief did not want people going above his head. Chief brought with him an agenda, but he did not provide it to us. My understanding is not going to the city manager was Chief's decision. During the meeting with Mr. Patterson, he said we were allowed to come to him. Shortly after that, the third week in July, after the first complaints were made, Mr. Patterson

again was notified things had not improved. Chief decided to change mine and Sgt. Dorman's work schedule to the 4:00pm to 2:00am shift. Chief's reasoned that there was no supervisor on duty during that time. However, there were corporals on duty at this time. We discussed the schedule with Deputy Chief before this. Again, Chief knew about our schedules before the complaint, and all of a sudden, our schedules changed."

Mr. Gordon continues: "Around this time, I heard that Sgt., Dorman's wife was threatened by Chief's wife. Chief's wife had a closed door with Mr. Patterson. Chief's wife is not an employee. Again, nothing was happening, and we felt the schedule change was retaliation from Chief. There was no reason for the schedule change. I do not believe we worked the schedule. Deputy Chief went in and advocated for me and Sgt. Dorman. At first, Chief told Deputy Chief he was not going to negotiate to terrorists, and he could be a bigger dick to us. Chief ended up not making us work the 4:00 PM to 2:00AM shift. I believe Deputy Chief informed Chief that he was going to lose myself and Sgt. Dorman. During this time period, we lost Officers Herrera and Kline. No one wanted to put up with Chief's treatment. We were hearing we were doing great work when the chief was speaking to the department directly but behind closed doors, Chief was sending us emails about us not doing our jobs."

Mr. Gordon adds: "On July 21, 2021, we met with Mr. Patterson because we felt we were being retaliated against with the schedule change. We expressed our concerns with Mr. Patterson, or concerns Chief did not care. We talked about Chief's lack of communication. We talked about how Chief does not address people during meetings. During this meeting, we discussed how Chief's wife threatened Sgt. Dorman's wife. We discussed how Chief not one time addressed the department when he was first appointed Chief. One of our biggest concerns was that Officer Susan Barnes, who was working with the department for nine months, never formally met Chief. We discussed equal responsibilities for supervisors. Chief basically appointed Sgt. Humphries without following the posting requirements of the city. Prior to this, Sgt. Humphries was demoted for dereliction of duty, yet Chief still promoted him to Sergeant. Chief and Sgt. Humphries have been friends since grade school. We talked about sharing equal responsibilities amongst the sergeants. Sgt. Dorman and I were handling a lot of tasks. We were approving reports, scheduling, supervising employees, searching for grants, creating an FTO manual and more. We also discussed the lack of communication."

Mr. Gordon continues: "Once I became a sergeant, I worked on an auto theft task force, battle. My schedule allowed me to split my days off. This task force results in overtime. I was supposed to have Mondays off. Sgt. Humphries complained that I was allowed to go to battle and have split days off. I spoke to Chief that me going to battle did not impact Sgt. Humphries. Sgt. Humphries was a school resource officer, so he could not have Mondays off. When I talked to Chief, he stated he

understood my concerns and that I was still to go to battle. However, I learned Chief was not going to allow me going to battle anymore. I felt this was because of my complaint with the city manager and bias that he has for Sgt Humphries. On May 12, 2021, Chief was not at firearms training like the rest of us and called an officer away to do a task he could have done. We discussed how 12-hour shifts were not the best option for officers.”

[REDACTED]

Mr. Gordon concludes: “After those meetings, things with Chief steadied out but never got better, then things got worse. Chief still appeared to have a lack of interest in the department. I still felt Chief had his sights on me and Sgt. Dorman.”

Mr. Dorman states: “I am Jason Dorman, and I am a former Patrol Sergeant Supervisor for the City of Florence Police Department. I started working with the department in July 2012. When I left the department, I reported directly to Deputy Chief Bill Vinelli who reported directly to Chief Shane Prickett (‘Chief’.) I submitted my resignation last Tuesday, February 8, 2022. I sent my resignation via email to Chief Prickett, Lori Cobler, Interim-City-Manager, Sean Garret, and a city council member.”

Me. Dorman adds: “I sent a follow up email the next day, February 9, 202[2]. I stated I had concerns that I could not complete one week due to the fact that I felt physically my sleep was affected, my safety, and the public safety. I stated I would be taking sick leave for my remaining time. My last day with the department was Saturday, February 12, 202[2].”

Mr. Dorman adds: “Starting back in July 2021, I had four meetings with two different City Managers, Sean Garret[t] was one, and Michael Patterson was the other. I had two meeting with Mr. Patterson, started in July. There were issues I was having with Chief. It started with an email from Chief he sent on June 1, 2021. Chief sent an email typed in all capitalized letters. In his email, Chief listed the responsibilities of the officers. Chief’s email was sent to the entire police department. A number of officers came to me and asked what Chief’s email was about. I reached out to the former Deputy Chief, Bill Vinelli (“Deputy Chief”). Deputy Chief did not know what Chief’s email was about. Deputy Chief stated he received a call from every officer in the department. It turns out Chief had an issue with two officers. Officer Amanda Winters, and I cannot recall who the other

officer was. In his email, Chief stated none of the responsibilities he listed were happening in the department.”

Mr. Dorman continues: “The next day, Michael Patterson called a meeting with me, Chief, Deputy Chief, and Sergeant Gordon. Mr. Patterson’s meeting was to discuss Chief’s email. During the meeting, Sergeant Gordon and I sat across from Chief. Chief refused to look at us. Chief stared at the ceiling. As soon as the meeting started, I advised Chief that the department thought his email was alarming. Chief got upset and he asked me if his email was addressed to me. I stated no. Chief stated that it was not my problem since his email was not addressed to me. We moved past the issue, and Chief did not seem upset anymore. We agreed that moving forward, there would be a supervisor meeting every Wednesday. A week later, we had a supervisor meeting, but Chief did not attend. Segreant Gordon and I had a conversation with Deputy Chief, and we expressed to him our concerns that Sergeant Humphries did not have extra responsibilities as Sergeant Gordon and me. Deputy Chief took our concerns to Chief. Our concern was that Sergeant Humphries had the same rank, yet he had set hours, he did not have to work weekends, he did not share responsibilities with Segreant Gordon, and I. Deputy Chief took it to Chief. Deputy Chief stated Chief informed him that he was not going to make any changes. Segreant Gordon and I were advised of Segreant Humphries responsibilities. On June 16, 2021, we had another supervisors’ meeting that Chief did not attend. Chief did not attend the next meeting after that either.”

Mr. Dorman adds further: “Usually on July 4th the majority of the staff comes in to perform traffic patrol. We generally have a meeting where Chief is supposed to assign duties. Chief did not communicate with us on July 4, 2021. Chief showed up ten minutes before the parade was supposed to start. Chief came to the parade in plain cloth[e]s. Chief did arrive in his marked vehicle. I thought it was odd. As soon as the department made its way through the parade, Chief went home and got his personal vehicle. I had to send officers home, as it was creating overtime. Chief returned to the city park, where I personally saw him consume four beers. I saw Chief sitting under a city of Florence tent. We have a police program called ITI. There is a function in ITI called a daily activities log. Chief tells us to use the Daily Activities Log if we work. We will log our time in and out, our mileage, and what we have done for the day. On July 4, 2021, I logged into ITI, and I saw that Chief’s log showed he had worked on 8:30 am to 2:30PM. It is between those hours that I saw Chief consume alcohol under the tent. I have no idea if Chief was armed or not during this time.”

Mr. Dorman continues: “I met with Mr. Patterson to discuss these concerns, and my previous concerns. I explained that ITI is where employees log their time they worked. Chief is salaried, so I am not sure if him logging his time in Daily is just his habit. I cannot say for sure if Chief was on duty on July 4th, but his Daily log indicated that he was.”

Mr. Dorman further states: "On July 6, 2021, I met with Mr. Patterson about the issues I had on the July 4th. I also had concern about Chief not attending the supervising meeting, that chief is not a working Chief, and he is not leading us. Chief ran his campaign on the notion he would be a working Chief. I.e., working shifts and patrolling, however, Chief is always in the office. When I spoke to Mr. Patterson, he wondered how Chief had so much vacation time. Mr. Patterson was not able to speak with Chief about those issues because Chief was on vacation. Mr. Patterson informed me that my issues would be confidential."

Mr. Dorman continues: "On July 14, 2021, I was advised by Deputy Chief that my schedule would need to change per Chief. Deputy Chief told me Chief told him that in regard to negotiating schedules, Chief does not deal with terrorists. My schedule was going to change from 10:00 AM 8:00 PM to 4:00 PM to 2:00 AM. I understand we are police officers. I have worked every shift the department has. There was someone already scheduled for this shift though who was a Corporal, therefore a supervisor would have been on duty from 4:00 PM to 2:00 AM. This was a Wednesday, and Chief once again did not attend the supervisors' meeting. The following week, July 20th, I was told by Sgt., Gordon that Chief, Detective Alex Wold, and Deputy Chief were all together, and Chief stated that someone had complained that he did not give assignments or help on July 4th. Detective Wold asked Chief who had complained, and Chief stated it was Sgt. Dorman. This led me to believe that was the reason my schedule was being changed. This is my speculation. I cannot remember if the schedule change was supposed to effect Sgt., Gordon. As far as I know, the other officers' schedules did not change."

Mr. Dorman adds: "Chief's wife and my wife are sisters. Chief is my brother-in-law. On July 19, 2021, Chief's wife, Nichole Prickett, was speaking to my wife on the phone, and she said even though my wife refuses to speak to her about our work issues, there are consequences that can affect my wife, like losing her home. Chief's wife said that I had an axe to grind. My wife told her sister that there is no communication from Chief, and that is why I did not communicate with him. I know these dates because I kept a record."

Mr. Dorman continues: "On July 21, 2021, the day after I heard Chief knew I was the one who complained, Sgt., Gordon and I met with Mr. Patterson. I told Mr. Patterson that I felt my schedule change was out of retaliation. I told Mr. Patterson how there is no communication with the Chief. How we get the occasional email. I spoke about Sgt., Humphries lack of responsibilities, and the threat to my wife about losing our home. Mr. Patterson told me Chief's wife cannot threaten me or my family. I was informed that Chief's wife met with Mr. Patterson. I do not know what was discussed."

Mr. Dorman adds: "Mr. Patterson mentioned to me that my wife's and Chief's wife's problems were personal. I assured Mr. Patterson that the girls' issues are theirs, and it has nothing to do with the work issues I spoke to him about."

Mr. Dorman concludes: "On July 24th, Chief's wife sent my wife an email explaining that what she meant by losing our house was about a Colorado Senate Bill. The email was also sent to Mr. Patterson. Their conversation had nothing to do with the Senate Bill. The Chief's wife said in her email that she thought she was having a conversation between sisters about family issues. "

Mr. Sackett states: "I cannot say with a 100 % certainty Chief has acted out of spite. Sgt. Dorman told me he went to the city manager and that Chief's emails followed shortly after. Eight months ago, there were issues that Chief was not addressing. That is when all his emails started and people getting passed over for promotions. I would not say it is vindictive behavior, but I would say this is retaliation. It is like Chief was doing something in response to Sgt. Jason Dorman going above him. This all started after Sgt. Michael Gordon and Sgt. Jason Dorman went to the city manager the first time."

Refuting

Information: Chief Prickett states: "Michael Gordon complained about me and my communication to Michael Patterson. Michael Patterson asked me what this was all about. There is certain information that goes out to certain individuals and not to others. Sgt. Gordon and Sgt Dorman did not like that certain information was not going out to them that was really none of their business. During that complaint, Sgt. Dorman had accompanied Sgt Gordon to Michael Patterson's. Sgt. Dorman accused me of being drunk on duty on July 4, 2021. I was not on duty that day. I was in plain clothes. I had driven my personal vehicle. I was selling T shirts with Lori Cobler, Sean Garrett, and Michael Patterson. I had a beer, as did everyone else, but I was not drunk. My name was not on the list of officers who were on duty. I asked Michael Patterson to terminate Sgt. Dorman for lying. Michael Patterson stated that Sgt Dorman was a whistleblower. I explained to Patterson that a 'whistleblower' exposed facts, a whistleblower was not a liar. Sgt. Gordon was with Sgt. Dorman during this complaint. As far as the complaints about my communication, the quickest way for me to communicate to the entire department is through email. Sometimes pressing matters need to get out faster. The sergeants were not getting information out, so I needed to step in and do it myself."

Chief Prickett adds: "I think I may have been too lax and did not get on people hard enough. However, I did not want to be like the last Chief who would call people names."

Chief Prickett continues: "When Sgt. Dorman and Sgt. Gordon were made sergeants, the plan was for them to get to know all of their troops. Multiple times, I told them they needed to work later than 8:00 PM so they could work with all the

officers. I changed the schedule multiple times for this to happen, and each time, they complained. Every chance they got they would come in early and leave before 8:00 pm. For instance, on New Year's Eve, I told Sgt. Dorman and Sgt. Gordon that we needed coverage. Isom was left alone from 8:00 PM to 6:00 AM I came on at 8:00 PM and [I] worked on my own dime to cover her until 2:00 AM. I pointed out to the sergeants that they were leaving too early. The sergeants were the ones who were making the schedules. The sergeants never followed my rules. Other officers told me the sergeants were leaving early. My standard was that the sergeants should have stayed until at least 10:00 PM.”

Chief Prickett adds: “I probably did tell Sgt. Dorman and Sgt. Gordon to work at 2:00 AM If people had issues, they should have talked to me. I told Bill I did not negotiate with terrorist type threats, such as giving me an ultimatum about quitting. In my past experience, when I gave into people making treats, they would continue to make threats in the future to get what they wanted. I only wanted to do what was best for the department.”

Chief Prickett concludes: “I know that Sgt. Gordon and Sgt. Dorman were complaining. I wrote an email about a specific employee not doing something. I think it might have been Amanda Winters. Both Sgt Gordon and Sgt. Dorman were off duty when I wrote this email, so it was not directed at them. Sgt. Gordon and Sgt Dorman came in the next morning, and they were upset with my email. Bill told me Sgt. Gordon and Sgt. Dorman wanted to meet with me and the city manager. Bill stated they only would talk with me if the city manager was present. We went in and talked, with Michael Patterson, and I asked them if they knew what the email was about. They stated no. I told them this email was about Amanda, not them, and they did not ask me about it. They city manager asked why this was a problem he needed to be involved in. This was the kind of stuff they were bringing to Michael Patterson. Patterson told them if Chief did not know about the problem, to not bring it to him. They were complaining about everything and anything I did. In 2018, the department got new patrol cars. I gave the sergeants the new patrol cars. It is not like I treated them bad. The also got the new patrol cars in 2021 as well.”

Mr. Wold states: “Chief Prickett told me there were complaints against him. I do not recall if Chief Prickett stated specifically who had complained about him. However, it does not take a rocket scientist to understand where the division was. Sgt. Dorman, Sgt. Gordan, and Deputy Chief Vinelli seemed to be in a group. During everyday operations, I could see Sgt. Dorman and Sgt. Gordon in Deputy Chief Vinelli’ s office. Once the city council meeting occurred, it was clear there were sides.”

Comments: There is no dispute that Chief Prickett stated to Mr. Gordon and Mr. Dorman that their schedules were going to change so they would be working the 4:00 PM to 2:00 AM shift. However, there is a dispute as to what influenced Chief Prickett’s

conduct. Mr. Gordon asserts Chief Prickett decided to change his and Mr. Dorman's schedules after they met with the City Manager, Mr. Patterson, on June 2, 2021, and July 6, 2021. Mr. Gordon also states Chief Prickett explained to them that the change was made because there needed to be a supervisor on duty. However, Mr. Gordon contends there was a supervisor on duty during this shift. In corroboration, Mr. Dorman states Mr. Vinelli advised him that his schedule would need to change to 4:00 PM to 2:00 AM. Mr. Dorman also corroborates Mr. Gordon when he states there was already a supervisor on shift, which was Ms. Isom. Moreover, Mr. Dorman states that Mr. Gordon told him about a conversation between Chief Prickett, Mr. Wold, and Mr. Vinelli, and that Chief Prickett stated someone had complained about him for not giving assignments or helping out on July 4, 2021. Mr. Dorman states Mr. Wold asked Chief Prickett who had complained, to which Chief Prickett responded, it was Mr. Dorman. Mr. Dorman postulates that this was the reason his schedule was going to change. Mr. Wold corroborates that Chief Prickett stated to him there were complaints made against him, however, Mr. Wold could not recall if Chief Prickett divulged who specifically made the complaints. In contrast, although Chief Prickett admits he likely told Mr. Dorman and Mr. Gordon to work the 4:00 PM to 2:00 AM shift, Chief Prickett states that when Mr. Gordon and Mr. Dorman were promoted to the rank of sergeant, there was a plan in place for them to meet all of their officers. Chief Prickett states he had to tell Mr. Gordon and Mr. Dorman multiple times that they needed to work past 8:00 PM in order to work with all the officers. Chief Prickett states he made multiple efforts to change their schedules so they could work past 8:00 PM, but that each time he changed their schedules, Mr. Gordon and Mr. Dorman complained. Moreover, Chief Prickett states Mr. Gordon and Mr. Dorman constantly defied his directives, and that the standard was they should have worked until at least 10:00 PM. The evidence demonstrates Chief Prickett's explanation is more plausible than the assertion he was retaliating against Mr. Dorman and Mr. Gordon for speaking out against him.

Although Mr. Wold could not recall if Chief Prickett stated who made the complaint against him, Mr. Wold states it was clear where the complaints came from, as everyone knew there was a division in the Florence PD. Mr. Wold states that Mr. Dorman, Mr. Gordon, and Mr. Vinelli were in a faction. Every witness this investigator spoke with confirmed that there was a division in the Florence PD, and the division boundaries were drawn at those who were on Mr. Vinelli's side, and everyone else. The evidence demonstrates there was a legitimate division in the Florence PD, and this was universally known by all. For instance, Mr. Ingle perceives the issues in the Florence PD were due to Mr. Vinelli wanting to supplant Chief Prickett as the Chief of Police. *See* Allegations One and Four. Mr. Humphrey states there seemed to be a division in the department, and that division was brought on by Mr. Dorman's, Mr. Gordon's, Mr. Vinelli's, and Ms. Isom's group, and no one else. *See* Allegation One. It is notable that Mr. Humphrey and Chief Prickett have been friends since adolescents, therefore, Mr. Humphrey may have a bias in favor of Chief Prickett. However, Ms. Barnes, who appears to be a neutral witness,

corroborates Mr. Humphrey when she states the Florence PD had two factions of officers who believed in two different things, that each group had their own agenda, and that the one faction lost, while the other faction is moving forward. Ms. Barnes states that one faction consisted of Ms. Isom, Mr. Vinelli, Mr. Dorman, Mr. Sackett, and Mr. Gordon. Ms. Barnes explains that it felt like warring factions, and that when Chief Prickett asked the superior officers to do certain things, they purposefully defied him. As an example, Ms. Barnes states Chief Prickett would send an email and some of the superior officers would not do what Chief Prickett asked in those emails. Ms. Barnes states Ms. Isom, Mr. Dorman, Mr. Gordon, Mr. Vinelli, and Mr. Sackett were all in the group who believed Mr. Prickett was an “idiot,” and they were not going to listen to Chief Prickett. There is evidence that appears to substantiate Ms. Barnes assertion that this group was not going to listen to Chief Prickett. On January 4, 2022, Chief Prickett sent the following email to the entire Florence PD:

ALL PATROL WATCHES NEED TO BE COMPLETED BY EACH OFFICER AT LEAST ONCE DURING THEIR SHIFT! ALL officers will complete the Daily Activity Report for every shift in ITI listing their shift hours, their starting and ending mileage, and the vehicle safety check. The river park needs to be locked EVERY night around 10pm. This WILL be notated in the frontline report, and when it gets unlocked in the morning, it will also be notated in the report. This includes everyone handling patrol duties. These are a priority and are mandatory! From this point on, if an officer does not complete ALL of the watches during their shift, they will be dinged, as well as their supervisor(s). Sergeants, aside from approving reports, it is your duty to make sure these directives are followed by everyone in your charge!

See Attachment 19.

The next day, on January 5, 2022, Mr. Dorman and Mr. Gordon met with Mr. Garrett, to discuss communication shutting down with Chief Prickett and concerns with Chief Prickett’s emails. *See Attachment 9.* This evidence supports the idea that Chief Prickett was continuously pushed back against when he requested things. Ms. Barnes states that she knew Chief Prickett had projects that were important to him, and he would send out emails telling people to do their jobs because those directives were not getting done. *See Allegation One.* Ms. Winters corroborates Ms. Barnes’s statement that there was resentment towards Chief Prickett from the group when she states Ms. Isom, Mr. Vinelli, Mr. Gordon, and Mr. Dorman frequently complained about Chief Prickett’s emails. *See Id.* Ms. Winters states she would go to lunch with Mr. Dorman, Mr. Gordon, Ms. Isom, and Mr. Vinelli, and there was constant maligning of Chief Prickett. Ms. Winter states she would ask the group if they talked to Chief Prickett, and they would always say they have tried, but nothing ever changed. Ms. Winters perceives this group did not want anything to change, and as she states, “They just wanted to complain.” *See Id.* It is worth noting that the

evidence demonstrates there was an incident where Mr. Sackett is alleged to have conducted a criminal-*esque* interrogation of Ms. Barnes, and she perceives Mr. Vinelli condoned Mr. Sackett's conduct. *See Id.* This may indicate Ms. Barnes has a bias against Mr. Vinelli. However, given the consistencies in the statements concerning the division in the Florence PD, this investigator found Ms. Barnes to be a credible witness.

One of the concerns which was frequently brought up was the lack of communication from Chief Prickett. This concern was highlighted by Mr. Gordon, Mr. Dorman, Mr. Sackett, Ms. Isom, and Mr. Vinelli. For instance, Mr. Dorman states communication from Chief Prickett had stopped. As the evidence shows, this was a concern Mr. Dorman and Mr. Gordon had been raising dating back to June 2021. *See Attachments 5, 8, 9, 10.* As the evidence shows, there were times where Chief Prickett made it clear that his decisions were not up for discussion. For instance, on January 4, 2022, after Chief Prickett stated the department would be moving to twelve-hour shifts, Mr. Gordon reached out to Chief Prickett and stated he received concerns from officers about the recent changes. *See Attachment 19.* Chief Prickett responded that he was not sure what needed to be discussed, and that it all seemed pretty clear to him. *See Id.* This investigator can understand the frustrations of Mr. Gordon and Mr. Dorman in regard to the lack of communication from Chief Prickett; however, as the evidence shows, not all officers shared their perceptions. For instance, Mr. Wold states he has never had an issue with Chief Prickett's communication. *See Allegation One.* In corroboration, Mr. Montoya states he does not have concerns with Chief Prickett, and that Chief Prickett has always communicated with him. *See Id.* Mr. Humphrey corroborates this perception when he states the communication and leadership of Chief Prickett is perfect, but there are some officers who do not agree with Chief Prickett's style. *See Allegation Four.* Mr. Humphrey discusses that some officers perceived Chief Prickett's emails as offensive, but this was not his perception, as he too received the email. *See Id.*

The evidence demonstrates Chief Prickett's decision making was under immense scrutiny from Mr. Gordon and Mr. Dorman. The evidence also shows there were clear dividing lines within the Florence PD. This investigator was struck by the change in morale the witnesses described that occurred in the Florence PD once Mr. Vinelli, Mr. Dorman, Mr. Gordon, and Ms. Isom left. For example, Ms. Barth states, "Now that Sgt. Dorman, Cpl. Isom, and Deputy Chief Bill Vinelli are gone, everyone is getting along better in the department. The department appears to be more comfortable now. It is nice now. I feel better about the police department now. Before, I always felt people were talking. The group did everything together." *See Id.* Ms. Barnes describes similar sentiments when she states, "I think the problems in the department have been resolved. There are two people left from the faction, Sgt. Gordon, and Cpl. Sackett. Everyone is reeling right now. I am sleeping better and not worrying about coming into work as much as before. I got to the point where I was physically ill because I was stressed out due to the work environment."

See Id. Ms. Winters states, “There is a different feeling in the department now that Michael Gordon, Jason Dorman, Ariana Isom, and Bill Vinelli are gone.... If anything, things are phenomenally better here....” *See Id.* Mr. Garrett, the former Interim-City Manager states, “From what I have heard, the issues in the PD seem to have calmed down since Sgt. Dorman, Sgt. Gordon, Ariana Isom, and Deputy Chief Bill Vinelli have left.” *See id.* The revelations of the witnesses demonstrate there was a faction in the department. With the exception of Mr. Sackett, the consensus amongst the remaining employees is that the Florence PD morale has improved.

Based on the circumstances presented above, this investigator finds it less likely than so that on July 14, 2021, after Mr. Gordon and Mr. Dorman reported concerns with Chief Prickett to the City Manager, Michael Patterson on June 2, 2021, and July 6, 2021, Chief Prickett unjustifiably threatened to change Mr. Dorman’s and Mr. Gordon’s work schedules to 4:00 PM to 2:00 AM.

Allegation 3: Mr. Gordon alleges that on January 4, 2022, Chief Prickett unjustifiably proposed moving the department schedules to 12-hour shifts and that Chief Prickett’s conduct was unjustifiably influenced by Mr. Gordon raising concerns with city council.

Supporting

Information: Mr. Gordon states: “On December 29, 2021, Chief emailed out the directives for 2022 to the department. The directives outlined the responsibilities for all the officers. The directives discussed the patrol sergeants’ duties. [Sergeants’] duties were half a page long, while most officers’ duties were only a few sentences. The sergeants were not given equal responsibilities. In Chief’s directive[s], it stated the department was only going to hire one patrol officer. Sgt. Dorman, Deputy Chief, and I all lobbied city council for the department to hire two additional officers. The directives also stated the department was going to hire a third person for administration. The person hired ended up being Chief’s son, Mason Prickett. Deputy Chief had no idea about the plan to only hire one officer. I received calls from officers who had concerns. Deputy Chief received calls and Sgt. Dorman received call. There was no communication as to why this was happening.”

Mr. Gordon continues: “On January 3, 2022, I was talking to Chief. Chief stated he felt someone went to city council about Chief’s decision to only hire one officer. Chief was very mad. Chief did not know who went to city council, but he knew it was someone from the department. Chief stated, ‘Once city council gives me the power there is going to be hell to pay.’”

Mr. Gordon adds: “On January 4, 2022, I received concerns from officers that Chief sent out an email about going to 12-hour shifts. We did a shift bid with the Chiefs approval some time before this. We had come up with a solution that no officer was working the same shift, and everyone got an equal opportunity. Shifts

were to be based on seniority. It was decided officers would work 6 months, and they would switch shifts. After a year, officer[s] would switch to the other side of the week. This was announced during a department meeting. I created a form, and I created the schedules. During a supervisor[s'] meeting it was decided the sergeants would be creating the schedules. This was so we could help with time off requests. The schedules were shared on the F-Drive under the *Supervisors* ' Folder. Chief had access to this folder. The schedules were set for the future."

Mr. Gordon continues: "Chief took over scheduling and told us that we were going to 12-hour shifts. This did not go over well with the department. Chief gave no explanation. Chief only sent out his email, which had no explanation. A couple of months earlier, officers [placed] bid[s] for their shifts. I believe Chief was retaliating because someone went to city council. Chief knew that no one wanted to work 12-hour shifts. There was a consensus amongst the officers that no one wanted to work 12-hour shifts. The shifts would cause a lot of overtime. Officers should not be working 14-hours. A lot of officers raised concerns to us. Officers were stating they could not stay with the department."

Mr. Gordon adds: "In his email, Chief stated the 12-hour shifts were to cover the jurisdiction and each other. Chief stated the schedule would make officers safer. Chief stated the schedule change was not negotiable, and that he was going to be taking over the scheduling. Chief stated city council told him to do this. City council is not Chief's boss. Council cannot tell Chief what to do. I believe council wanted two officers to be hired."

Mr. Gordon continues: "I sent Chief an email informing him that some officers had expressed a lot of concerns with the changes. I requested a meeting with the Chief so the officers could voice their concerns. Chief stated he did not know what needed to be talked about that he received the directives from council, and we were moving forward."

Mr. Gordon concludes: "On January 5, 2022, we met with the City Manager, Sean Garret[t] to discuss our issues with Chief. During this meeting, we told Mr. Garret[t] about our previous complaints with Mr. Patterson, and [that] our biggest issue was the lack of communication. We talked about the schedule and showed Mr. Garret[t] why 12-hour shifts were unsafe, [and] that a 12-hour schedule would result in a massive amount of overtime. We also discuss[ed] Chief's statements about [how] there was going to be hell to pay after someone went to city council. I expressed to Mr. Garret[t] that Chief was displaying retaliatory behavior. Mr. Garret[t] explained how the hiring of one officer idea came up, and Mr. Garret[t] agreed the department should hire two officers. There would be no officers training together on a 12-hour schedule. Mr. Garret[t] stated he was told the sergeants were in the offices too much. Not once did Chief tell me or Sgt. Dorman that we were in the office too much. Our yearly evaluation reflected excellent work performance for myself and Sgt. Dorman. We explained to Mr. Garret[t] that we perform a lot

of work in our offices, such as scheduling, ordering equipment, etc. In this meeting, we discussed how Chief is not helping cover gaps. Chief told Mr. Garret[t] he covers shift, however, Chief only covers shifts when he is working DUI overtime.”

Mr. Dorman states: “On January 3, 2022, Chief sent an email outlying who would be approving reports. There is virtually no face-to-face communication with Chief. On January 4, 2022, Chief sent an email detailing that we would be going to 12-hour shifts. Chief stated he would be handling scheduling and time off requests. For over a year this was something Sgt. Gordon and I did. Prior to Chief’s email, Sgt., Gordon told me that Chief made a comment in front of him, “They want to go to council, let’s see how they like working 12-hour shifts.” Sgt., Gordon might know the date. The 12-hour shifts did not end up happening. Deputy Chief and Mr. Garret[t] met on that issue before it came to fruition.”

Mr. Dorman continues: “In Chief’s email about going to 12-hour shifts, he stated city council has received complaints about officers’ safety and 12-hour shifts gave the department the most coverage. We were working 10-hour shifts. 12-hour shifts meant that no officer would be by themselves. On the 10-hour shifts, there are gaps where officers are by themselves. Deputy chief attempted to contact city council, but they denied deputy chief the ability to address them. City council stated we are not their employees, and deputy chief’s issues need to go through proper channels. This contradicted chief because he reports to the city manager, so I do not know why city council would meet with Chief. Council has never provided their input on police department scheduling, or the police department ever. I do not know why this would be happening now. Once we got the email, Sgt. Gordon, myself, and Deputy Chief began receiving calls from officers about their schedules. I had no answers because I only received an email from chief, just like the officers. The only communication we received was an email. Sgt. Gordon, deputy chief, and I were getting bombarded with questions that we did not have the answers for.”

Mr. Dorman adds: “The corporals’ duties changed too. There were a number of concerns from a multitude of officers reaching out to us. Either on January 4th or 5th, Sgt. Gordon emailed Chief and requested that he meet with us to discuss the issues. Chief emailed Segreant Gordon back and said there was nothing to discuss. Deputy Chief Vinelli learned about, and he told me he spoke to Chief and requested we meet to discuss the issues that [were] going on. Deputy Chief Vinelli told Chief that some officers were thinking about quitting. Chief Prickett told Deputy Chief Vinelli that there was nothing to talk about. The situation was getting worse, and Chief stopped communicating.”

Mr. Dorman continues: “Sgt. Gordon and I asked to meet with Mr. Garrett. We informed Mr. Garrett about the shutdown of communication. On January 6, 2022, Deputy Chief Vinelli and I came up with a schedule for the officers which avoided going to 12-hour shifts. Mr. Garrett came to Deputy Chief’s office. Mr. Garrett

told us that the overtime that would result from 12-hour shifts has not be[en] approved. We showed Mr. Garret[t] the schedule that we created to maintain 10-hour shifts. Mr. Garrett stated that he liked the schedule we created, and that he would speak to Chief. Deputy Chief asked Mr. Garrett if he could have another opportunity to speak to Chief before. Mr. Garrett agreed. Later that day, Chief came in. Deputy Chief told me that he had a conversation with Chief about the schedules and Mr. Garrett's concerns. Chief refused to look at the schedule for 20 minutes. Chief came around and finally looked at it."

Mr. Dorman concludes: "Deputy Chief and Chief began talking about officers quitting. Deputy Chief stated Chief said to him that part of him wants the officers to quit. Chief ended up accepting the schedule and Deputy Chief informed me that Sgt. Gordon and I would both be working on schedules as before."

Mr. Vinelli states: "Chief Prickett and I were both appointed to our positions in 2019. I was appointed the Deputy Chief. Chief and I had a great relationship for most of the time. We worked well together for about six and a half years. Chief and I were happy to be in the two command positions. It was all good for the first couple months. In April 2020, the department received an email from Chief and he stated he was in control that this was his department, and he also laid out each officers' role, including mine. Basically, Chief told all the officers we were doing a crappy job. This email was sent within five months of Shane Pricket[t] becoming the Chief. I was irritated by the email. Everyone was coming to me upset. I was the voice of reason in the department. People were asking me what they could do. I went to Chief and said to him maybe we should have talked about your email before you sent it out. Chief agreed and said he should have consulted with me. Things got better for a few months. However, the communication stopped again, and Chief began to send out emails where he stated we were not doing our jobs. In his email, Chief said people were overstepping. Once again, things were good for another couple of months. At the end of 2021, on December 29, 2021, we were doing interdiction with other agencies. I got a call from one of the sergeants, and they asked if I saw the email from Chief. Chief was mad that someone had gone to city council. City council authorized the department to hire two officers, however, there was a decision to only hire one officer. I heard Chief Prickett, Lori Cobler, and Sean Garret, all made the decision to hire an administrative assistant instead of two officers as authorized by city council. The officers in the department heard the rumors about this decision. I went to Chief and asked him about the rumors. Chief was irritated that someone from the department went to city council instead of going to him. My understanding is the council was upset about the decision to not hire two officers as authorized. The department... decid[ed] to hir[e] two officers and an administrative person."

Mr. Vinelli adds: "Chief sent out an email and stated he was directed to come up with new schedules, and everyone was going to now be working twelve-hour shifts. The officers were previously working ten-hour shifts. Chief stated this was

not up for discussion, and that this was the way it was going to be. [Sgt.] Gordon emailed Chief and copied me on it. [Sgt.] Gordon asked if we could discuss the schedules and have a meeting. Chief responded that he made his decision, and there was not going to be a meeting. Everyone was up in arms. However, Chief would not talk about it.”

Mr. Vinelli continues: “I went to Chief, and he said council handed him his butt. I told Sean Garret[t] we were going to lose four officers because of this. [Sgt.] Gordon, [Sgt.] Dorman, [Cpl.] Sackett, [Cpl.] Isom, all came to me. All four of these officers stated they could not take that there was no communication from Chief. I have copies of those email from Chief. Chief would tell council this was the best group he ever worked with, but it contradicted what he was saying to us internally.”

Mr. Vinelli concludes: “I spoke to the Interim-City Manager, Sean Garret, and Sean asked if I could fix the schedules. Sean did not want to lose [the] four officers. I worked on the schedules. I brought them to Chief, but he refused to look at the schedules for twenty minutes. Chief said he refused to negotiate with terrorists. I told Chief we needed to compromise. Finally, Chief looked at the schedules. This was on January 5, 202[2]. I informed Sean Garret[t] and Lori Cobler that Chief had agreed to adjusted schedules.”

Mr. Sackett states: “There was no communication as to why we were going to 12-hour shifts. This was a decision that did not impact Chief’s friends. Chief does not like confrontation, and he will keep someone happy in the moment. Recently, Sgt. Humphrey was made commander, yet he is someone who was previously demoted by the prior chief. Sgt. Humphrey does not know the ins and outs of the job. Sgt. Gordon was an eight-year veteran who has never been demoted. Sgt. Gordon was way more qualified for the position. Sgt. Gordon is someone who has empathy, he is someone I believe should be working in schools with children. In regard to the commander position, there was no review board. Just because certain people follow Chief’s agenda, they are put in favorable positions.”

Refuting

Information: Chief Prickett states: “On January 3, 2022, city council stated it did not want officers working alone. There is a chiefs’ circle Zoom call I participate in. This is a call where Chiefs around the state meet and discuss things. I asked the chiefs about working 12-hour shifts. More than half the chiefs stated their departments work 12-hour shifts. city council did not want us to be alone, I thought 12-hour shifts would address this problem. Isom, Sgt. Dorman, and Sgt. Gordon complained. Bill came to me and told me these officers were going to quit. I was told by city council that no one should work alone. I told Bill to come up with another plan. It is not like I did not try to work with these people. These officers could not stay in their lane.”

Chief Prickett adds: "Bill went to Sean Garrett and said these officers were going to quit. On January 3, 2022, I figured out that my team was not all working together. I spoke to city council and asked them to confirm anything they heard through me. [REDACTED]

[REDACTED] I asked city council to talk to me about these problems. I talked about the pay scale issues with the sergeants being negotiated without me. These were things I needed to know about. When Bill requested his executive session, city council asked Bill where his chief was. In regard to the 12-hour schedule, Sean Garrett talked to Bill, and Sean told Bill not to do the 12-hour shifts."

Chief Prickett continues: "No one came to me with their concerns. I have always been open to talk about things. They absolutely could have come to me. My employees now, I told them my door is always open. Felix Montoya came to me and said he felt Bill did not support him. I told Bill about Felix. I told Bill to fix the issue with Felix. I am a proponent of all of us working together and treating each other like family. The only email I put out where I stated my decision was final was the 12 hour shifts and some 2022 directives. I told Sgt. Gordon there was nothing to talk about. That I thought that I was pretty clear."

Chief Prickett adds: "I talked with Cpl. Joe Sackett a couple of weeks ago, and I had to tell him to not treat his coworkers like criminals. I had received reports that Cpl. Sackett was talking down to co-workers, and I told him if I continued receiving these complaints, there would be disciplinary action. Supposedly other officers had complained to Bill about Cpl. Sackett, but nothing was done about it."

Chief Prickett concludes: "Sgt. Gordon sent me an email on January 4, 2022, and stated he wanted to have a meeting so the officers could voice their concerns with me. Officers told me before they did not want others speaking for them. I sent out the schedule, and I realized that I had made mistake with someone's schedule. I changed the mistake. I said to Sgt. Gordon that I am not sure what needed to be discussed, and that I had my direction from city council. On January 4, 2022, I emailed all the officers and stated they needed to complete their reports in ITI, and there needed to be vehicle safety checks (per the insurance company). I also sent out an email about the 2022 directives. I stated if the mandatory patrol watche[s] were not completed, the officers would be dinged, as well as their supervisors. I listed the things that needed to be discussed."

Ms. Barnes states: "The only thing that struck a chord with me was when we had a blow over about the schedules. Chief said we were moving to 12-hour shifts. Chief totally revamped the schedule. No one liked the changes to the schedules. The faction supposedly went to the city manager because the Chief would not talk to them. The city manager and Deputy Chief Vinelli ended up creating a better schedule. I heard from several people that Chief stated he would not negotiation

with terrorists. If Chief said this, it would strike a spot with me. Apparently Chief was reluctant to look at the schedules at first, but then he did.”

Ms. Barnes concludes: “Sgt. Dorman told us that city council and the city manager went to chief with concerns that we only had one officer working certain shifts. Chief and city council decided it was safer to have two officers on duty at all times. This is why we were going to start working 12-hour shifts. Although, I am the only who works by myself, and I have never had a problem with it. I have worked alone my entire career. Chief’s email about this was direct. Chief basically said this was how it was going to be. Everyone implies a tone. Like I said, I do not know what the backstory was with the email.”

Mr. Santiago states: “I do recall when Chief sent out an email about moving to 12-hour shifts. We did not move to 12-hour shifts. I believe we were going to go to 12 hour shifts due to coverage concerns. I heard it was city council who thought 12-hour shifts would ensure the officers were not working alone. I heard this through word of mouth. It may have come from Chief or the sergeants.”

Ms. Isom states: “Chief sent out an email about the 2022 directives and everyone in the department was upset about his email. Chief emailed us and stated he was moving all of us from 10-hour shifts to 12-hours shifts. The officers were not happy, and we went through the chain of command to voice our concerns. There was no communication from Chief about why he was doing this. The only communication was Chief’s email. Deputy Chief and the city manager talk[ed] to Chief.”

Ms. Isom concludes: “We did not end up working the 12-hour shifts as Chief stated in his email. Deputy Chief and Sgt., Dorman talked to the City Manager, Mr. Garret[t], and they came up with a schedule for us to stay at 10-hour shifts. We did not have enough staff to work 12-hour shifts. Chief stated he did not want anyone working alone, and that was what city council wanted him to do. That is why council authorized us to hire two officers, so there would be maximum coverage. It did not make sense to hire only one officer.”

Mr. Garrett states: “I engaged in conversations with Sgt. Dorman and [Sgt.] Gordon about the directives that were sent out by the Chief [regarding] twelve-hour shifts, changes, who was completing the schedules, only hiring one officer, and that communication had been shut down. Their main concern on the 12-hour shifts was officer safety, and necessary overtime. I do not believe the Chief was implementing the twelve hour shifts for retaliation, but to cover shifts. I believe the manner in which the initiatives were presented and comments such as I don't negotiate with terrorists resulted in in being perceived in such a way. The Chief was not happy that individuals went to Council.”

Mr. Garrett concludes: “The police department did not end up going to 12-hour shifts as proposed. I reached out to Bill and asked if he could come up with a different schedule that still made sure all officers were working with someone at all times. From what I recall, communication between Chief and the officers broke down, and they tried to raise these concerns to Chief, but he was unwilling to discuss this with them. I reached out to Bill so I would not have to directly interfere with the department. I read Chief’s emails, but I did not have a conversation with him about the 12-hour days. Chief was upset that people were going behind his back to Council. I do not believe Chief proposing 12-hour shifts was retaliation; I think Chief genuinely believed this would address the coverage issues.”

Mr. Montoya states: “I did receive an email from Chief about the department moving to 12-hour shifts. I was for the move. This was going to give us four days off and three days on. Chief did not communicate too much about the move. The move never happened. I do not know why we were moving to 12-hour shifts. I was sick during this time, so I was homebased for two weeks.”

Mr. Humphrey states: “In regard to the email about moving to 12-hour shifts. There was a complaint the department did not have enough coverage. Moving to 12-hour shifts would have ensured no that no officer would be on shift alone. I guess there was a complaint officers were on shifts alone, so Chief was going to switch to 12-hour shifts to address this concern. Chief spoke with me about this in person. I believe there was also an email sent out that explained why we were going to 12-hour shifts. I think it came about because Sgt. Dorman, Sgt. Gordon, Deputy Chief Vinelli, and Ariana Isom had complained officers were working alone, and someone brought their concerns to city council and city manager. We regularly work 10-hour shifts. We never went to 12-hour shifts. I do not think Chief was retaliating when he did this. Chief’s decision would have impacted the entire department, not a select few.”

Ms. Winters states: “I did not find anything strange about Chief wanted to move to 12-hour shifts. We are the only agency in this region who works 10-hour shifts. Canon City, and Fremont County all work 12-hour shifts. No lower line officers had a problem working 12-hour shifts. I did not complain, neither did Felix Montoya, Daniel Santiago, or Susan Barnes. We were all willing to work 12-hour shifts. I think Chief wanted to move to 12-hour shifts because the sergeants and Deputy Chief Vinelli were talking about not having enough coverage and we needing to hire two additional officers. I am not one hundred percent sure, but I believe it had to do with coverage and making sure officers were always working with someone else at all times.”

Mr. Ingle states: “Sgt. Gordon, Sgt. Dorman, and Cpl. Isom would choose their own shifts. City council was complaining that we had officers working alone. Chief was trying to get these shifts covered. Chief directed Bill Vinelli to get this done. Sgt. Dorman, Sgt. Gordon, Cpl. Isom, and Bill Vinelli would all meet to go

to lunch for an hour and a half. Citizens were complaining. The change in the shifts was Chief's frustration. Chief directed Bill Vinelli and the sergeants to get the schedule done, which they did not. Chief got upset and he sent out his email. The email was well deserved. It is hard to explain. During this time, there was a division in the department. Chief does not like confrontation. Every officer was going to be moved to 12-hour shifts. City council directed that Chief address this in a public meeting. A solution was the city council approved the hiring of two additional officers. Until two officers were hired, city council demanded we cover those shifts."

Comments: Mr. Gordon contends Chief Prickett's proposal to move to twelve-hour shifts was unjustifiably made in response to him and Mr. Gordon going to city council. The evidence does not support Mr. Gordon's assertion. Mr. Gordon states he believes Chief Prickett was retaliating because someone went to city council, and Chief Prickett knew nobody wanted to work twelve-hour shifts. The evidence overwhelmingly suggests Chief Prickett had a bona fide belief moving to twelve-hour shifts would address coverage concerns, and that Chief Prickett's proposal served a legitimate purpose for the Florence PD. Mr. Garrett corroborates this when he states although Chief Prickett was upset people had gone behind his back to city council, he does not believe Chief Prickett's twelve-hour shift proposal was in retaliation. Moreover, Mr. Garrett thinks Chief Prickett genuinely believed twelve-hour shifts would address the coverage issues. The majority of the witnesses corroborate Chief Prickett's proposal to move to twelve-hour shifts was in response to addressing coverage concerns raised by city council. Mr. Dorman says Chief Prickett stated in an email that city council received complaints about officers' safety and moving to twelve-hour shifts provided the department with the most coverage. In corroboration, Mr. Santiago states he believes the department was moving to twelve-hour shifts due to coverage concerns. Chief Prickett asserts on January 3, 2022, city council stated it did not want officers working alone, and after he spoke with other police chiefs around the state, he decided that moving to a twelve-hour shift model would address the coverage concerns.

It appears the volatility between Chief Prickett, Mr. Gordon, Mr. Dorman, and Mr. Vinelli, contributed to the perception that Chief Prickett was retaliating against them. As the evidence shows, on January 4, 2022, Mr. Gordon emailed Chief Prickett and stated he had received concerns from people within the Florence PD with the changes that recently took place. *See* Attachment 19. In addition, Mr. Gordon asked Chief Prickett if they could hold a meeting to discuss those concerns. *See Id.* In response, Chief Prickett stated he was not sure what needed to be discussed, and that it all seemed pretty clear, he had direction from city council, and they were moving forward. *See Id.* The evidence seems to demonstrate that shortly after this, Mr. Vinelli approached Chief Prickett to discuss the twelve-hour shift schedule, and Mr. Vinelli asserts Chief Prickett stated he did not negotiate with terrorists. In contrast, Chief Prickett states when he spoke to Mr. Vinelli, he told him he did not negotiate with terrorist type threats, such as giving him an

ultimatum about quitting. *See* Allegation Two. It appears Mr. Vinelli shared Chief Prickett's "terrorist" comment with others, as Mr. Dorman states when Mr. Vinelli went to talk to Chief Prickett, he stated he was not going to negotiate with terrorists, and he could be a bigger "dick." It is unclear exactly what Chief Prickett stated, or when the word "terrorist" was used by Chief Prickett. For instance, Mr. Dorman states Chief Prickett made this comment around July 14, 2021, after Chief Prickett threatened to change his schedule to 4:00 PM to 2:00 AM. *See* Allegation Two. Nevertheless, it appears Chief Prickett's use of the word "terrorist," in any context, further perpetuated the issues between him and Mr. Gordon, Mr. Dorman, and Mr. Vinelli. It is not unreasonable to understand why Mr. Gordon felt the move to twelve-hour shifts was in retaliation, especially after being told Chief Prickett referred to him as a terrorist. To this investigator, it appears Mr. Vinelli contributed immensely to the volatility between Chief Prickett and his direct reports. As the evidence shows, Mr. Vinelli more likely than not divulged to Mr. Dorman and Mr. Gordon, Chief Prickett's controversial comment using the word "terrorist." To this investigator, it appears the relationship between Chief Prickett and Mr. Dorman and Mr. Gordon was irrevocably broken, and many people, including Mr. Dorman, Mr. Gordon, Chief Prickett, and Mr. Vinelli, perpetuated these problems. However, despite the issues that existed between Chief Prickett and his direct reports, Mr. Dorman, Mr. Gordon, and Mr. Vinelli, the evidence demonstrates Chief Prickett's conduct was more likely than not aimed at addressing legitimate concerns of department coverage.

Based on the information above, this investigator finds it less likely than so that on January 4, 2022, Chief Prickett's proposal to move the department schedules to twelve-hour shifts was unjustifiably influenced by Mr. Gordon raising concerns with city council.

Allegation 4: Mr. Gordon and Mr. Dorman allege that on February 5, 2022, after Mr. Gordon and Mr. Dorman spoke with the Interim-City Manager, Sean Garrett, on January 5, 2022, about concerns with an email Chief Prickett sent out about the 2022 Florence PD directives, Chief Prickett unjustifiably took away Mr. Dorman's and Mr. Gordons task of approving police reports.

Supporting

Information: Mr. Gordon states: "On February 6, 2022, I reported to work, and I went to enter training certificates in ITI, the portal. When I went to enter them ITI, I no longer had my admin privileges. At this time, I emailed Chief and informed him that I was unable to enter the certificates, due to not having administrative permission. I also let Chief know about an issue with scheduling. Chief responded and stated he was going to make the correction on the schedule, but he did not respond to me about me not having access to ITI."

Mr. Gordon continues: “On February 5, 202[2], I learned Chief was going to be approving reports. This was a Saturday. We received a sl[ew] of emails from Chief that day....”

Mr. Gordon concludes: “... Chief sent an email out that stated he was taking over approving reports. Approving reports was the sergeants' duties. Sergeants have always approved reports. It has been this way for eight years. Again, I felt Chief was retaliating by taking away our duties.”

Mr. Dorman states: “Things calmed down for months. The dust settled. We were able to have supervisor meetings with the Chief present. Leading up to 2022, one of the things the department was working on was the hiring of two additional officers. This was approved by city council. Between December 22, 2021, and December 29, 2021, Chief's son, Mason, was speaking to my wife, and he said he was excited because there was going to be another administrator position opening up front. I asked how this could be, because I did not know how the budget was going to support the position. Mason Prickett stated the police department was only going to hire one additional officer in order to support the new administrative position. The irony in this is that Mason told me he was not the first pick for the administrative position. The lady in charge upfront, Nancy Barth, had someone helping her. That person ended leaving to take another job. There was a vacancy. Mason was telling me there was a position that needed to be filled, and an additional administrative position. The first position was not filled by Mason Prickett. My speculation is that the second position was created to give Mason a job.”

Mr. Dorman adds: “I called Deputy Chief, who was my immediate supervisor. I asked Deputy Chief if he knew what was going on. Deputy Chief stated he did not know anything about this, but he was going to try and find out. I know Deputy Chief ended up making a phone call to Councilman, Brian Allen. The position was something the officers had followed closely. A number of us followed up about the position. Councilman Allen assured Deputy Chief Vinelli that he would have a conversation with the Interim-City Manager, Sean Garrett, and remind him that there are two positions for police department that will be filled. Councilman Allen added the administrative position was not included in the budget, it was a position created, but not approved. The administrative position did end up getting approved, and the department would still hire two additional police officers.”

Mr. Dorman adds: “My email was shut down on Friday February 11, 202[2]. I was not directed to return my equipment, and to not wear my uniform. On February 5, 2022, Chief sent out four emails stating all reports were to be sent to him for approval. This was mine and Sgt., Gordon's responsibility for the last two years. The same day, Chief sent the email out in regard to Corporal Isom. The same day, Chief sent out an email stating all battle operation were being shut down. Deputy Chief and I were slated to go to battle. The last email Chief sent out was him

announcing a new position of a patrol commander. I was later told by Mr. Garret[t] that Chief had not received approval for this position nor was it in the employee handbook.”

Mr. Dorman states further: “On December 29, 2021, Chief sent out the 2022 department directives. This was something Chief did this year. In the directives, Chief outlined the duties of each position. Patrol Sergeant directives contained the biggest description of all the positions. Chief said if sergeants are in the office for more than one hour, those duties will go to the administrative staff. The duties that were listed cannot be accomplished in an hour. Sergeants approve reports. We must find probable cause. We go through body camera footage for cases, and we go through dash cam footage. Sergeants make sure the officers are conducting themselves professionally on the street. The dash cam footage is something we cannot review in our cars. We must review this in-house. There are certain reports we are supposed to print out. We do not have those capabilities from our cars, so we must be in the offices for this. We also are responsible for going over grant writing. This is difficult to do on the street. I cannot watch my safety if I am occupied with these tasks. We are also monitoring the radio when on the street or in the office.”

Mr. Dorman concludes: “In regard to the directives, it stated there will be only one new police officer hired. City council was made aware of Chief’s email from 12/29/21. Chief copied Mr. Garre[t] on this email. I believe Deputy Chief also sent Chief’s email to Councilman Allen.”

Mr. Sackett states: “Chief has stripped all the duties away of the sergeants. We are in limbo, so I am not sure what is going on. I am not really given any duties.”

Mr. Sackett adds: “This all started months back when Chief’s emails came out. Chief would send emails out would come that did not support what we were doing. We either did our jobs and got smacked in the face, or we did not do our jobs and got smacked in the face. I have seen Chief’s retaliatory behavior recently. In my opinion, I think there is lot of unfair practices that occur in the department. People are put in positions who do not deserve to be. There is lack of communication. As police officers, it is imperative there is a support system. A lack of communication can lead to liability and lawsuits. I think there is a lack of understanding and foresight. There is no leadership in the department. People run a mock without effective leadership.”

Mr. Sackett concludes: “Retaliation is prevalent in the department. Individuals have been passed up for opportunities. Chief has made decisions out of personal friendship and biases. Chief’s decisions are not made for the betterment of the community.”

Mr. Vinelli states: “Chief was upset that Segreant Dorman, and Sergeant Gordon went to the city manager. They felt nothing was getting done, and they needed to speak with someone. They spoke to Sean Garrett on January 5, 202[2]. I am not sure if Chief knew if exactly who from the department spoke to the Sean Garret. However, Chief was aware that someone from the department spoke to Sean Garret, as Chief sent out a scathing email shortly after.”

Refuting

Information: Chief Prickett states: “I did take over approving reports. I am someone who will work at home to approve reports. The sergeants would only do this while on the clock. Nancy would come to me and complain that Sgt. Dorman and Sgt Gordon were not approving reports. I get my reports approved every day. Sgt Gordon and Sgt. Dorman might have completed this once or twice a week. I am still approving reports. However, once the commander starts, he will start approving some reports, and I will continue approving some reports.”

Chief Prickett continues: “We have laptops and Wi-Fi in our vehicles. There is nothing the sergeants need to do in the office. The sergeants were in Bill's office. They were always in their laughing, joking, and carrying on. The reports were not getting done. Officers were having to do more work. I was doing patrol watches, and I could see that no one was doing the watches like they should have been. These guys did not care.”

Chief Prickett concludes: “There were many issues with the sergeants spending too much time in the office & leaving their vehicles running outside for hours on end. I defended this at first, citing an instance in the past where I went to a call, and the camera system in the patrol vehicle still needed to boot up. The camera was not booted up, and a preparator tried to run over an officer. I was a proponent of keeping the cars running so the cameras were working at all times. I finally wrote a memo that officers needed to be in their cars. I wrote that email more than once. I also wrote email about their needing to be completing mandatory patrol watches. The department is responsible for patrolling the water plant, the water tanks, the processing plant. The department is paid \$30,000 a year to patrol the plant and the other water system components. I ask that the officers patrol this area at least once a shift. We have an app called frontline that we log the patrol information. The sergeants, and some of the patrol officers, were not doing these patrols. The sergeants were not supervising their officers and making sure they were patrolling these areas. I had to step in and remind people we were supposed to be doing this. I had to send this email out five or more times. I told the officers if they were not patrolling this area, they were going to be dinged, as were their supervisors who should have been ensuring this was getting done. I received a complaint that a customer could not get their car released from impound for 45 minutes. It turned out the sergeants and Bill were out to lunch together at this time. I told them there was no reason for someone to wait 45 minutes to get their car out

because they were all out to lunch at the same time. I said for now on, only two officers can be on a meal break at the same time. They did not like that.”

Ms. Barth states: “... I would send reports to the district attorney’s office, and I would notice the sergeant[s] were not approving reports in the correct manner. We never had any reports kicked back by the district attorney’s office. Another example of things not getting done is how the sergeants were only checking tickets once a week.”

Ms. Barth continues: “In regard to approving reports, I am not sure why Chief assumed approving reports. I know there were things missing in the reports when the sergeants were approving them. It should not have taken as long as it was taking the sergeants to approve reports. The sergeants were always in the Deputy Chiefs Office. The sergeants work 10:00 AM to 8:00 PM. Out of a ten-hour day, the sergeants were usually in their office from 10:00AM to 5:00 PM, with the exception of lunch. Sometimes the sergeants would go out and patrol after Deputy Chief would leave the office.”

Ms. Barth adds: “I did see Chief’s directives email. I believe Chief noticed the sergeants were not getting certain things done.”

Mr. Montoya states: “I receive[d] Chief’s email about the 2022 directives. I did not have an issue with Chief’s email. Chief wants us to do our job. Chief was just asking people to do their job. If people are doing their job, they do not have to worry about the email. I have not talked about Chief’s or Deputy Chief’s emails. I stay out of the gossip. Gossip has always been the worst enemy of any department I have worked in.”

Mr. Humphrey states: “... I started working for the Florence Police Department since 2001. I started as a reserve and went to full time in 2002. I have been in law enforcement for twenty-two years.”

Mr. Humphrey adds: “The communication and leadership of Chief Prickett is perfect. There are some who do not agree with chief’s style. There was a mention of offensive email. Chief sent the email to everyone, but I did not perceive Chief’s emails as offensive. I am not sure what Chief’s first email was about. I think this came about because we had some individuals who were not doing their jobs, so Chief sent an email out with directives. The email was addressing officers who were spending too much time in the office. The sergeants needed to be on the streets more. I did not take Chief’s email as offensive because I was doing my job. I know Sgt. Gordon and Sgt. Dorman were spending too much time in the office. The sergeants worked on reports in the office, but they did not need to spend as much time as they were in the office. For instance, there were calls that would come in and Sgt. Dorman and Sgt. Gordon would not help the other officers out with those calls. For example, I helped Officer Amanda Winters, Officer Montoya,

and Officer Ingle on a call with an adolescent. We put our heads together to solve the problem. We handled the situation. However, Sgt. Dorman called Officer Winters and asked why we did something a certain way during that call. Sgt. Dorman spoke to Officer Winters and Officer Montoya and asked why they did what they did. Sgt. Dorman and Sgt. Gordon were in the office during this call, yet they were asking why we did what we did. Had the sergeants been on scene, like they should have been, they would not have had to ask questions. I do not recall the date of this incident. I want to say it occurred sometime in November or December 2021.”

Mr. Humphrey concludes: “I am aware Chief is now approving reports. Prior to this, this was a duty of both sergeants on the front half and back half. I was never told why Chief assumed this responsibility. I assume it is because reports were not being approved on time and reports were being approved by the sergeants but contained inaccurate information. Nancy Barth was receiving reports that the DA was kicking back because of issues with the approval process. For example, maybe there was a vehicle pulled over for drugs, but the drugs were not sent off to the lab in a timely manner.”

Mr. Ingle states: “I would never lie. If I saw Chief doing something unethical, I would say something. The emails Chief sent out were well deserved. I do not think the emails were enough. Chief wanted and asked the sergeants to do certain things, but the sergeants were doing their own thing. Chief sent an email out about how he wanted things done. The sergeants had a fit that Chief sent them directives. Chief Prickett is relatively new in his role as Chief of the department. Chief is trying to find his way. Chief is good hearted, and he is honest. It is bizarre they went this direction. I think it comes down to Bill Vinelli wanting to be Chief of Police.”

Mr. Ingle continues: “Chief was frustrated that things were not being done. Police reports were not getting approved. Reports were not getting to the DA’s office. Nancy would inform the chief about this. Sergeants were not doing their reports. Chief was frustrated with the sergeants. Once Sgt. Dorman and Sgt. Gordon got their stripes and were promoted to sergeant, they changed. They sat in their offices all day long. I witnessed this. Chief was frustrated with them. Chief is laid back and he does not like confrontation. Chief got to the point where he was upset. I do not think Chief’s email was improper. The sergeants were spending 3/4 of their day in their offices. The sergeants were complaining they were working on paperwork.”

Mr. Ingle adds: “In my mind, I do not think there would be an issue with sergeants working on paperwork in their squad car. I do not think Chief was being unreasonable. Things were just bad as the sergeants were taking advantage of Chief. I have heard rumors Sgt. Dorman, Sgt. Gordon, and Cpl. Isom were referring to Bill Vinelli as their real Chief. I feel Chief Prickett could be more

assertive. Chief does not deserve this. I saw an issue with the sergeants, and this was frustrating for me. I did not get too involved, as I am part time, and am a lieutenant in name only.”

Mr. Ingle concludes: “Jason Dorman and Chief Prickett are brothers-in-law, they also live right next to each other. Jason Dorman is kind of a devil’s advocate. For example, we would have meetings and Jason Dorman would always pull the negatives out to talk about. Jason Dorman was a good cop. I am not sure what changed with Jason Dorman. Det. Worley stated something to which may explain what Jason Dorman. Apparently, Jason Dorman responded to a horrible call where a woman was burnt alive, and her son also died. I heard Jason Dorman changed after this incident.”

Mr. Santiago states: “Chief sent out directive for 2022. Some officers got upset about this. Our patrol sergeants were being lazy. Chief’s directives took the sergeants out of their office. This made Sgt. Dorman quit and another sergeant feel he [was] being retaliated against”

Mr. Santiago concludes: “I was made aware there were individuals who were speaking with the city manager and city council. I know of two individuals who spoke with city council. Sgt. Dorman told me he spoke to city council. Sgt. Dorman was open about going to city council and the city manager.”

Ms. Barnes states: “The sergeants are no longer approving reports. As of last week, Chief started approving reports. I assume Chief took this on because of an email he sent out about the sergeants needing to be visible and not in the office all day long. The administrative duties were a side responsibility. My best guess is Chief wanted to see how much time approving reports actually took. Chief had sergeants telling him reports were keeping them in the office all day long. I do think Chief’s concerns were legitimate in regard to sergeants spending too much time in the office. Sergeants are all off shift when I come in. Cpl. Isom and Sgt. Dorman were in the office all the time together, talking and joking. There were numerous times I tried and talk to Sgt. Dorman, but I would not be able to because Cpl. Isom Sgt. Dorman were talking about nothing. I did not work with the sergeants.”

Comments: Mr. Gordon and Mr. Dorman assert that Chief Prickett’s conduct was unjustified when he assumed the role of approving reports, a task that Mr. Gordon and Mr. Dorman were responsible for as sergeants. There is insufficient evidentiary support to substantiate Mr. Gordon’s and Mr. Dorman’s assertion.

Mr. Dorman states Chief Prickett sent out his directives email and stated if the sergeants were in the office for more than an hour, those duties would be taken away from them. Mr. Dorman contends the duties Chief Prickett listed in his email could not be accomplished in an hour. Mr. Gordon corroborates Mr. Dorman when he states Chief Prickett sent out an email on December 29, 2021, where he outlined

each law enforcement officers' responsibilities. It appears Chief Prickett's email on December 29, 2021, put Mr. Gordon and Mr. Dorman on notice that approving reports would be taken away from them, if the reports were not being completed in a timely manner. It also appears Chief Prickett acted in accordance with his email when he took away approving reports from Mr. Gordon and Mr. Dorman. To this investigator, Chief Prickett's conduct does not appear to be arbitrary, as he forewarned Mr. Gordon and Mr. Dorman that he would take tasks away that were not being completed. Moreover, the witnesses describe issues concerning the amount of time Mr. Gordon and Mr. Dorman were spending in the office. For example, Mr. Ingle states Chief Prickett was frustrated because certain tasks, such as approving police reports, were not getting done. Mr. Ingle states he was aware that the district attorney's office was not receiving reports. Mr. Ingle states that Ms. Barth informed Chief Prickett about her concerns that the sergeants were not doing their reports. In addition, Mr. Ingle states he personally observed that Mr. Gordon and Mr. Dorman would sit in the office for most of the workday. In corroboration, Ms. Barth states although she is not sure why Chief Prickett assumed approving reports, she knows there were things missing in the reports when Mr. Gordon and Mr. Dorman approved them. In addition, Ms. Barth states approving reports should not have taken Mr. Dorman and Mr. Gordon as much time as it had. Moreover, in corroboration with Mr. Ingle, Ms. Barth describes how out of the ten hours during the workday, Mr. Gordon and Mr. Dorman were usually in the office for most of the day. Mr. Santiago describes Mr. Gordon's and Mr. Dorman's work ethic as indolent, and that Chief Prickett's email on December 29, 2021, addressed the issues with the amount of time Mr. Gordon and Mr. Dorman spent in the office.

In addition, Mr. Santiago states Chief Prickett's email was about getting Mr. Dorman and Mr. Gordon out of the office. In corroboration, Ms. Barnes states the sergeants needed to be more visible and not in the office all day long. Ms. Barnes states the administrative duties were a side responsibility, and her assumption is that Chief Prickett wanted to see how much time approving reports actually took, because Mr. Gordon and Mr. Dorman told Chief Prickett the reports kept them in the office all day. It is notable that out of the fifteen individuals who were interviewed, eight of them universally describe issues with the amount of time Mr. Gordon and Mr. Dorman spent in the office. It is also noteworthy that five of the officers who do not discuss these concerns are the same group of people who many in the department labeled as ardent detractors of Chief Prickett. To this investigator, the dichotomy in the Florence PD between Mr. Vinelli's advocates and Chief Prickett's advocates presented a tremendous challenge when assessing witness credibility. This investigator determined that certain officers appeared to be more credible than others. In particular, Ms. Barnes and Mr. Santiago both appeared to be neutral, which strengthened their credibility. For example, Ms. Barnes expresses that she has been critical of some of Chief Prickett's decisions, such as moving to 12-hour shifts. *See Allegation Three.* Mr. Santiago was candid that many of the problems in the Florence PD occurred due to the lack of structure, and officers being allowed to be complacent. Although Mr. Santiago does not explicitly attribute

this to Chief Prickett, these are issues that objectively implicate Chief Prickett, as he is the Chief of Police of the Florence PD.

In addition, there seems to be much attenuation in the timeline between the meeting with Mr. Garrett on January 5, 2022, and Chief Prickett's email on February 5, 2022. It is consequential to look at the context surrounding Chief Prickett's conduct as a whole that occurred on February 5, 2022. On February 5, 2022, Chief Prickett sent a series of emails to multiple officers addressing a wide spectrum of concerns. For instance, on February 5, 2022, Chief Prickett emailed Ms. Isom and stated that she would no longer work in a law enforcement capacity. The same day, Chief Prickett emailed Mr. Vinelli and stated his services as a law enforcement officer were no longer needed. In addition, on February 5, 2022, Chief Prickett emailed AMNET, the IT servicer used by the City of Florence PD, and requested Ms. Isom's access to the computers be temporarily restricted. *See Allegation six.* Moreover, on February 5, 2022, Chief Prickett emailed Mr. Dorman and Mr. Gordon and informed them that he would be assuming the role of approving reports. The evidence demonstrates that on February 5, 2022, Chief Prickett engaged in conduct which was directed at the group of officers many in the Florence PD labeled as proponents of Mr. Vinelli, which raises some questions. Ms. Barnes's explanation seems to shed light on why Chief Prickett engaged in this conduct. When Ms. Barnes was asked by this investigator if she had ever experienced or witnessed a time where Chief Prickett acted retaliatory or spiteful, Ms. Barnes stated no, but she further explained, "When you have five people gunning for your job, I cannot imagine how someone could not be spiteful, [but] I do not think it is retaliation when someone is trying to take back their department." *See Allegation One.* Although Chief Prickett's conduct on February 5, 2022, raises a lot of suspicions, it appears Chief Prickett, as the Chief of Police, felt a lot of pressure to take control of the department. The evidence shows the Florence PD was divided into two factions, Mr. Vinelli's faction, and Chief Prickett's faction. *See also Allegation Two.* In regard to Mr. Vinelli's faction, some officers describe that there was a concerted effort made by Mr. Dorman and Mr. Gordon to usurp the chief of police position from Chief Prickett. For instance, Mr. Ingle states that Mr. Dorman, Mr. Gordon, and Ms. Isom referred to Mr. Vinelli as their "real chief." Some witnesses also describe Chief Prickett as someone who avoids conflict and is too lenient. For example, when explaining why he believed there was an investigation, Mr. Ingle states:

The bottom line is this whole thing is about power. Bill Vinelli felt he could knock Chief Prickett out of his position. Bill Vinelli was reluctant to leave for the Chief position in Morrison. Bill Vinelli explicitly told me he did not want to go. I am standing up for Chief Prickett. I think Chief has been too kind and too soft."

See Allegation One.

To this investigator, the turmoil in the Florence PD appeared to have come to a head on February 5, 2022, as this appears to be the date Chief Prickett decided he was going to address all the outstanding issues. There is limited support to substantiate Mr. Gordon's and Mr. Dorman's assertion that Chief Prickett's conduct was in retaliation against Mr. Gordon and Mr. Dorman for speaking to Mr. Garrett on January 5, 2022. In reviewing the evidence, it appears there were legitimate concerns with the amount of time Mr. Gordon and Mr. Dorman spent in the office, as well as legitimate concerns with Mr. Gordon and Mr. Dorman approving reports. Chief Prickett appeared to have notified Mr. Dorman and Mr. Gordon on December 29, 2021, when he sent his directive's email, that if certain tasks were not being completed, he would redelegate those tasks. Furthermore, Ms. Barth corroborates reports were not being approved in timely manner and/or contained inaccurate information. In addition, Ms. Barth's statement demonstrates she was aware there were problems with Mr. Dorman's and Mr. Gordon's effectiveness in approving reports. There is enough corroborating evidence, particularly in the form of witness statements from those who appear to be neutral witnesses to substantiate Chief Prickett's contention that his conduct was in response to addressing legitimate concerns with how much time Mr. Gordon and Mr. Dorman were spending in the office, and with their ability to approve reports in an accurate and timely manner.

Based on the circumstances presented above, this investigator finds it less likely than so that on February 5, 2022, after Mr. Gordon and Mr. Dorman spoke with the Interim-City Manager, Sean Garrett, on January 5, 2022, about concerns with an email Chief Prickett sent out about the 2022 Florence PD directives, Chief Prickett unjustifiably took away Mr. Gordon's and Mr. Dorman's task of approving police reports.

Allegation 5: Ms. Isom alleges that on February 5, 2022, Chief Prickett sent her an email that unjustifiably stated she was no longer working that night as scheduled, that she was to turn in her patrol vehicle, that she was to turn in her keys and equipment, and that she was being placed on light duty in the front office.

Supporting

Information: Ms. Isom states: "Chief Prickett sent me an email on 2/5/22 and stated he had been advised by the city attorney that they were not going to prosecute any charges of mine because I was on a Brady list. The city attorney knew about the Brady list since July 2021. The District Attorney, Linda Stanley, put me on the Brady List. I was working with an attorney to try and investigate that further. This had nothing to do with the Florence PD."

Ms. Isom adds: "I learned I was on a Brady list after I received an email from Chief in July 2021. Chief stated that I needed to come to his office for a meeting. I did not read Chief's email because I was not on shift, and I do not check my

email when I am not working. Therefore, I missed the 9:00 AM meeting, as I did not know I was supposed to be there. Deputy Chief Vinelli asked me to come to the office. This was when I learned I was put on the Brady list. This was the first I heard about Brady. Chief and Deputy Chief talked to the City Attorney, Matthew Krob, and the City Manager, Michael Patterson. The Brady list impacts my ability as an officer to testify in court. It is up to the DA to put someone on the list. It is up to the DA to determine if they are going to proceed with the case or not, and it is up to the judge to decide if the incident merits me testifying or not. No one has been to court to figure it out. My cases are easy to drop. No officers have been going to court because cases are being dropped. I have never been to municipal court the entire time I worked here. I received an email on 2/5/22 from Chief saying the city attorney was not going to prosecute my charges. I had a lawyer, and we were working towards getting Linda Stanley, the DA, to look at it. I have no idea why Chief decided on 2/5/22 to take away my law enforcement duties. I received a promotion in April 2021. I was promoted from an officer to a corporal.”

Ms. Isom continues: “I was not planning on leaving the Florence PD. Even when Deputy Chief left, I had no plans of leaving. I was scheduled to work the evening of 2/5/22. Chief sent me an email saying that I was no longer working that night as scheduled, that I was to turn in my patrol vehicle, that I was to turn in my keys, that I was to turn in my computer and my equipment, and that I was being placed on light duty in the front office.”

Ms. Isom further states: “I was not aware of Chief’s email until Sgt., Dorman called me. That is the only communication I received about Chief’s email. I do not check my email when I am not working. Sgt., Dorman explained that I was not working that night. I complied with Chief’s email. On 2/6/22, I went in and decided to resign from the department. I gave my two weeks’ notice. My last day was going to be 2/22/22. I emailed Chief my resignation letter, and I left my equipment in Mike Ingle’s office. I also signed a resignation letter and placed it in Chief’s office. I checked my email throughout the rest of the day, but I did not get a response for Chief.”

Ms. Isom adds: “I had no direction on what to do. When Nancy Barsh showed up, she came in and said basically all I could do is answer the phones and I could help up front. I did not have access to ITI or evidence. Nancy stated she just read Chief’s email, but I did not get the email. Nancy said I can answer phones and help people at the front. I do not know how the administrative office works. I was not allowed to touch anything. I was not told anything. I was left upfront.”

Ms. Isom continues: “That day, at 8:30AM, I spoke with Lori Cobler and Sean Garret[t] about the concerns of what just happened. At 9:00 AM, Lori advised me to go home. I used the rest of my sick time to finish out my two weeks. I was physically and emotionally sick from the stress. On Tuesday night, I slept on my

bathroom floor. I was throwing up from the stress. My last day in the building was 2/7/22.”

Ms. Isom adds: “I was completely blindsided by Chief’s 2/5/22 email. I thought I had a good relationship with Chief. I offered to work extra shifts because Chief, Sergeant, and Deputy Chief had a lot going on. That is the last time I personally spoke with Chief.”

Ms. Isom continues: “I do not know if Chief is retaliating against me. I have not done anything, so I do not know what Chief would be retaliating against me for. I do feel Chief is discriminating against me, but I do not know on what basis. I worked closely with Deputy Chief Vinelli and Sgt., Dorman. Deputy Chief was talking to city council about getting things fixed in the department. When he couldn’t get things fixed, Deputy Chief resigned. Chief might associate me as guilty by association. Chief was treating me differently. Chief told me I was to show up to work dressed business casual. In Chief’s 2/5/22 email, he directed me to dress business casual. The newest girl in administration, Danielle, dresses in business casual. However, Chief’s son, Mason Prickett, who works here, wears T-shirts, jeans, sweatshirts, and sneakers. I think the most business casual I have seen Mason dressed is he had a polo, jeans, and sneakers. Mason just graduated high school. Mason has been working at the department for a couple of months. No one thought it was strange Chief hired his son.”

Ms. Isom continues: “There was also an issue because city council had approved the department to hire two officers, but Chief decided to hire an additional person for the administrative side instead of a second officer. The officers were curious why Chief changed the plan.”

Ms. Isom adds: “The last time I was called to testify in court was the beginning of 2021. I was working with the Florence PD. I think I had one case with Florence where I went to court at the beginning of 2021. I have not gotten a subpoena in months. I have never been called to municipal court. I was even talking Sgt., Dorman about it, and he said he has been to municipal court twice since he has been working her. I have never spoken directly to the City Attorney, Matthew Krob.”

Ms. Isom continues: “When we first found out about the Brady, Chief and Deputy Chief backed me off of calls until we learned what Brady meant, and what was going on. I hired a lawyer to fight the Brady. I had an attorney in Denver. The DA said I could request a hearing. I was trying to figure out how to request a hearing. The attorney I hired said the DA made up her mind. The attorney said it was the DA’s decision. I spoke to this attorney in December 2021. The attorney’s son took over his cases, and he referred me to another lawyer in January 2022. I am not sure if I will work in law enforcement again.”

Ms. Isom concludes: "Between July 2021 and February 2022, Chief never asked me about the status of my Brady issue. Deputy Chief and Sgt., Dorman asked me about it."

Mr. Vinelli states: "I was a part of the hiring of Officer Isom. Officer Isom was at the department for two years. She worked with Colorado State Patrol before coming here. We received notification of Officer Isom being on a Brady list in July 2021. We had no idea before that she was going to be on a Brady list. This was the first time I experienced an officer being on a Brady list. I had conversations with the District Attorney of the 11th Judicial District, Linda Stanley. My understanding is Officer Isom could still work as a law enforcement officer, but the only thing that would come into question is her testimony in District Court and County Court."

Mr. Vinelli adds: "The department did not have to fire [Ms. Isom,] she could still work in [the] Florence [PD] and go to Municipal Court. Matthew Krob performs all our municipal court prosecutions. Matthew Krob never said anything to me about Officer Isom at all. I do not think Officer Isom has testified in municipal court at all while she was at Florence. Officer Isom would issue DUIs, so she was often in County Court and District Court. Officer Isom continued to work until the day I left in February. Chief told Officer Isom the same thing he told me. The city attorney said she could not testify in Municipal Court. Basically, I stuck up for Officer Isom, and once I was gone, Chief was able to get rid of her."

Mr. Vinelli concludes: "When Chief and I learned about the Brady List in July 2021, Chief and I both agreed Officer Isom was still a good officer, we were going to keep her employed. Isom continued to work as a law enforcement officer until Chief sent her an email in February 2021. I am sure Chief was retaliating against Isom for coming to me with issues, and I was no longer there to protect her."

Mr. Dorman states: "On 2/5/22, Chief sent an email out where he stated all reports were to be sent to him for approval. That same day, Chief sent an email to me, Corporal Isom, Nancy Barth, Sgt., Humphrey, Sgt. Gordon, where he stated he was notified that Mr. Krob, the City Attorney, was no longer going to prosecute Corporal Isom's cases due to her Brady status. In his email, Chief stated that Corporal Isom was not to return to work, she was to return her vehicle and equipment, and she was going to be reporting for light duty. Corporal Isom was instructed to dress business casual. Chief's son has been seen wearing blue jeans and a T-shirt to work. I do not think this is business casual."

Mr. Dorman adds: "We have all known since early spring 2021 that Corporal Isom was on a Brady List. Deputy Chief and Chief were the first people to be made aware of this. This came from the Colorado State Patrol. I have been in law enforcement for over nine years. I have seen in other departments where officers

were put on the Brady List. I had a partner who was on the Brady list. My understanding is this impacts Corporal Isom's testimony."

Mr. Dorman continues: "Chief and Deputy Chief met with the city manager at the time when they learned about the Brady list. It was only in the last couple months that we heard Corporal Isom's cases were being dismissed. The city attorney did not have a problem with this until now. It was unfair that Chief was not going to afford Corporal Isom access to the office. The Brady had nothing to do with Corporal Isom not being trusted. I am not sure why Corporal Isom was requested to dress differently than the people she would be working with."

Mr. Dorman further states: "Chief sent this out in an email. The problem is that Corporal Isom does not check her email unless she is at work. Knowing this, I called Corporal Isom and told her to check her email. Corporal Isom would have come into work in her uniform had I not called her. I think this was poor management and communication."

Mr. Dorman concludes: "My speculation is Chief was treating Corporal Isom this way because of guilt by association. Corporal Isom was not going to HR or the city manager with complaints. Corporal Isom came in and she did her job. The timing is alarming. All of a sudden, the city attorney contacted Chief. I am not sure if Chief first contacted Mr. Krob. I believe Corporal Isom is technically still an employee, but she is taking time off for the rest of this week. Corporal Isom told me she was advised by Nancy Barth that she was only going to be answering phones, and she would not have access to ITI and evidence. In my 9 ½ years, I have never seen an evidence tech brought onto the stand. I cannot remember what day, but Corporal Isom's email was shut down as well. We receive subpoenas through email from the district attorney's office. The City of Florence uses a company called AMNET for their IT issues."

Mr. Sackett states: "The entire Brady thing with Officer Isom is bogus. I know who Officer Isom's supervisor is at Colorado State Patrol. I know exactly who he is. For valid reasons, Officer Isom was not forthcoming about the Brady because of who her supervisor was at Colorado State Patrol. Officer Isom was not forthcoming at the beginning. When that all came to light, Deputy Chief Vinelli was supportive of Officer Isom. When Deputy Chief Vinelli left the department, Chief decided he was going to strip Officer Isom of her duties. Chief said he was directed by the city attorney. This is what I was told by Sgt. Gordon. I do not think the city attorney directed Chief to do this. If this was the case, this would have happened six months ago. When Isom was stripped of her duties, Sgt. Dorman left. I think it is a power trip of Chief."

Mr. Sackett concludes: "On February 7, 202[2], Officer Isom asked me if the door code had been changed. She asked me if she was working. I told her I would call Chief. Chief said that Officer Isom was to come to work through the front door,

and that she would be working with Nancy Barth, and to show up at 7:00 AM. There was no communication from Chief to Officer Isom. I did not experience the same issues with my email not working as Officer Isom. Officer Isom stated to me that she was locked out of her email and ITI. Chief may have delegated Nancy Barth to take away Officer Isom's access to her email. The email access should have stayed on for Isom. In my opinion, this was childish and vindictive."

Mr. Gordon states: "On February 5, 2022, I spoke to Corporal Isom because she received an email from Chief who stated he had spoken with the Matthew Kroh, the City Attorney and that Mr. Kroh was no longer going to prosecute Corporal Isom's cases in municipal court. Chief told Corporal Isom she could no longer participate in a law enforcement capacity. Chief stated Corporal Isom needed to turn in her vehicle, that she was going to be working light duty, and that she was to dress in business casual attire. The Chief's son, Mason, who works in administration, wears jeans and a T-shirt to work. Chief also told Corporal Isom to turn in her equipment. This email was sent on a Saturday. Corporal Isom does not check her email when she is not working. Everyone is aware of this. Corporal Isom did not receive a call from Chief. The only way Corporal Isom found out about this is because Sgt. Dorman called her...."

Mr. Gordon continues: "Corporal Isom was told she can no longer use the computer, that she cannot touch files. Basically, all Corporal Isom could do was answer phones. The other admin clerks were not restricted like Corporal Isom. Chief continuously supported Corporal Isom during the Brady issue. I feel like Corporal Isom being let go because she was close to the sergeants, and she is being treated for being guilty by association. Nancy Barth told Corporal Isom she could only answer phones. An admin assistant for all the years I have been at the PD has never been requested to testify. Corporal Isom is being singled out, which is wrong."

Mr. Gordon adds: "We learned Corporal Isom was on the Brady list back in 2021. Corporal Isom was put on the Brady list after she was hired. It came after an investigation that was happening after she left the Colorado State Patrol. We all know the sergeant at the Colorado State Patrol who initiated the Brady. This sergeant dislikes women. After review of the Brady allegation, Deputy Chief, Chief, and the sergeants discussed what to do, and we spoke to Corporal Isom about trying to fight this."

Mr. Gordon concludes: "The city attorney knew about Corporal Isom's Brady. From day one, everyone supported Corporal Isom. I believe Chief reached out to the city attorney and asked if he could get rid of Corporal Isom due to the Brady. Before this, the city attorney had no problem with Corporal Isom testifying."

Refuting

Information: Chief Prickett states: “I think Sean Garrett tried to do the right thing, but he was out of his league. City council wanted to be in charge of hiring and firing, which by charter, they are not supposed to take part in any personnel issues. I think Sean was not allowed to do the whole city manager job. I think Sean resigned because of this. During this time, officers were coming to me and reporting there was a coup. Included in this coup was Ariana Isom, who we found out was put on the Brady list last March. Michael Patterson said we should give her a chance to fix it. Isom said she was going to get a lawyer and fight the Brady. Almost a year later, and nothing happened. I found out Isom did not hire a lawyer. The DA's office was dismissing all of her cases. I went to Matthew Krob, and he stated that Isom was unfit for duty as long as she was on the Brady list. In February, I sent Isom an email and informed her that she could no longer perform law enforcement duties. I was taking Isom off the street. Isom was going to be working in the front, and she was still going to be paid the same. One issue I had was that Isom was going on scenes with Officer Barnes, and she would say the case was going to be thrown out because she was involved. I heard Isom thought it was funny. Other officers were complaining to Bill and the sergeants about Isom's attitude, but they would not do anything.”

Chief Prickett adds: “My intention was for Isom to work here for the long term when I moved her into the office. I was not going to take away her pay. I was trying to protect the department. Matthew Krob stated Isom was not fit for duty. There was an incident where Isom showed up on scene for suspicious death, and the DA stated had this case turned into a homicide, they would have possibly had to throw it out. I do not have the power to hire or fire. I was in Lori's office, and we had Matthew Krob on speaker phone when he told me that Isom was not fit for duty. I believe this call with Matthew took place possibly February 3rd or 4th. It was the week before Bill was leaving.

Chief Prickett continues: “One of my officer Barnes told me that Isom was purposely damaging cases by saying that now she is on scene, she was ruining cases. So, I wanted to do disciplinary action. I had to do something to get Isom off of the road. I found out she had not hired a lawyer. I told Krob she was damaging cases. I removed Isom on February 5, 202[2]. I spoke with Matthew Krob and Lori before I sent out the email.”

Chief Prickett further states: “Bill was giving me updates on Ariana Isom. Bill would tell me that Isom was taking care of it. Isom should not have been on duty for as long as she had been. Isom was asking Susan Barnes to borrow money to hire a lawyer. My intention was to wait and see if Isom could get this appealed.”

Chief Prickett concludes: “When Isom came in for her first day to work in the office, she was here for less than thirty minutes. No one had a chance to give her

the door code. I am sure Nancy Barth would have given Isom access had she stayed.”

Mr. Wold states: “I have seen in my career other officers who were put on the Brady list. We had an officer at the Department of Corrections who was put on the Brady list. I know how the Brady list works. An officer could not effectively do their job if they were on a Brady list. Once an officer is put on the Brady list, they no longer have credibility. In Isom’s case, I was told by Chief that we were losing cases because the district attorney was dismissing Isom’s cases. I was told by Deputy Chief Vinelli that when District Attorney Stanley was hired there was a Brady issue. Even as an investigator on a case, Isom’s Brady would taint the case and bring about reasonable doubt. It is a detriment to not only Isom’s cases, but the cases of other officers she might be involved with.”

Ms. Barth states: “I do recall when Ariana Isom was placed on administrative duty. Ariana Isom was supposed to be working directly with me. On her first day of admin duty, Ariana Isom came in and said she did not feel good. I asked her if she knew what she was going to be doing. I informed her that she could not be on ITI. Ariana Isom was very rude to me and the other admin girl. Ariana Isom stated she did not know why she was here. Isom left the office at about 8:30 AM. Danielle Fox called me and stated she did not know where Isom went. She thought Ariana Isom was in the front, and I assume she was speaking with Lori Cobler. Ariana Isom told Danielle that she was leaving for the day. Danielle called me and informed me that Isom left. I called Lori, and Lori informed me that Isom did not feel good. I believe Isom’s last day was Tuesday, February 8, 202[2]. Isom was supposed to work with me until she cleared up the Brady issue, but she ended up putting in her two weeks’ notice. There were no plans to terminate Cpl. Isom.”

Ms. Barth adds: “The door codes were changed, and Mason Prickett gave everyone a card with the codes on it. I am not sure if Isom got the card or not. We were changing all the door codes. Everyone was locked out of some of the rooms and the buildings until the following Monday. I know a lot of people did not know the new codes. If Isom was not here, she probably would not have gotten the card with the new codes.”

Ms. Barth concludes: “I do have access to ITI. Chief told me that Isom was only allowed to answer phones and she could talk to people at the window. Isom was not allowed to be on ITI. Isom was on the Brady list, and ITI is what houses all of our reports.”

Ms. Barnes states: “Cpl. Isom was on the Brady list and my understanding is every time she would be involved in something, the district attorney was dismissing it. Cpl. Isom told me this numerous times. Cpl. Isom told me I did have to worry about doing anything because the case was going to be dismissed anyways. Cpl. Isom was put on administrative duties and she decided to quit. Cpl. Isom got to the

point where her attitude was that nothing mattered. Several officers had gone and complained about this about two weeks before she was placed on administrative duties. The whole thing had to do with the Brady list. I believe the city attorney, or the city manager came over and said Isom's municipal charges were being kicked out and that is why Chief decided she could no longer be involved in anything that involved law enforcement duties."

Mr. Garrett states: "I was not present during any conversations about Ariana Isom. I know Chief had a conversation with the city-attorney, Matthew Krob, and it is my understanding Mr. Krob stated he could no longer prosecute any cases Ariana Isom was on. It is my understanding that some [of] Isom's cases were being dismissed by the district attorney's office."

Mr. Garrett concludes: "The timing of Chief's decision was odd. I am not sure why Chief chose this time. I think it could have been handled differently. I am not sure how many cases of Isom's were being dismissed. If we could not prosecute any of her cases, I think that was a problem and impacted her ability perform all the duties related to the job."

Mr. Humphrey states: "I know that Officer Isom was put on a Brady list. A lot of Officer Isom's cases were being dropped by the city attorney and district attorney's office. The attorneys were not doing anything with her cases. The Brady came from Colorado State Patrol. I am not aware of the incident that brought about the Brady, but Colorado State Patrol is who initiated it. I believe Chief, Deputy Chief, and the City Manager, Mike Patterson, knew about the Brady."

Ms. Winters states: "... [Cpl.] Isom would show up to my calls and help me, but I never left Isom alone on a call because I was concerned with what would happen to my cases. For instance, if I went to a domestic violence call, I would never leave Isom's side, unless I knew the victim and accused were not around. I did not want my cases to be thrown out in court. After March of last year, we went a whole year and we heard nothing about Isom's Brady issue. Isom kept saying she hired an attorney, and she was working on the Brady; however, we found out about a month ago, around end of January, that Isom did not have an attorney. Isom was allowed to work Battle and other overtime. I never witness[ed] Isom displaying the attitude of her not caring, but I was uncomfortable with her coming to my calls. At the very least, Isom should have been taken off the road."

Mr. Ingle states: "Cpl. Isom is the first officer in this department who I witnessed being put on the Brady list. The Brady list was an issue. Cpl. Isom said she was trying to fight it. Chief gave her a chance. I do not know what came about her fighting the Brady, or if Chief gave her a timeframe, I think Matthew Krob, the city attorney, stated he would not prosecute Cpl. Isom's cases. The DA already was dropping her cases. It is my understanding Ariana Isom is now working for Bill Vinelli, as is Michael Gordon. I think Michael Gordon starts on 3/7/2022."

Three other officers who previously worked for the Florence Police Department will also be working with Bill Vinelli in Morrison. I do not think Jason Dorman is one of them. I heard he is getting out of law enforcement, which I do not think is a bad thing.”

Comments: Ms. Isom was placed on the Brady list sometime in or around July 2021, for conduct that occurred when she was not a police officer in the Florence PD. As the evidence shows, not only was the Brady list creating issues for Ms. Isom, but it was also presenting issues for the entire Florence PD. When this investigator reached out to Mr. Krob during the onset of the investigation, he stated Chief Prickett reached out to him regarding Ms. Isom’s Brady status, and he informed Chief Prickett the City of Florence would no longer prosecute cases where Ms. Isom was the charging officer. This was corroborated by Chief Prickett when he states he spoke to Mr. Krob and was informed Ms. Isom was unfit for duty as long as she was on the Brady list. In addition, on February 5, 2022, Chief Prickett emailed Ms. Isom and stated:

I have recently been notified by the Florence City Attorney that the municipal court will no longer be prosecuting any municipal charges filed by you. The County court has already been dismissing your cases as well, due to your current Brady status. With that being said, I can no longer have you participating in any law enforcement capacity. You shall not report to work tonight. You shall return your police vehicle to the PD today by 5pm with your personal items removed. (patrol vehicle keys in my mailbox) You will be put on light duty in the FPD front office under the direction of Nancy Barth until further notice. Your shift will be Tuesday – Friday 7am to 5pm with a 1-hour lunch. You shall dress in business casual attire. Your keys / computer and other law enforcement equipment shall be turned in on Tuesday morning to Mike Ingle.

See Attachment 17.

Ms. Isom states being on the Brady list impacts her ability as a law enforcement officer to testify in court, and it is up to the district attorney’s office to put someone on the list. This was not a decision made by Chief Prickett or anyone else associated with the Florence PD. Ms. Isom states the Brady list puts the district attorney in a position where they must determine if they are going to proceed with a case or not. The evidence appears to suggest Ms. Isom’s cases were being dismissed by the district attorney’s office. For instance, Ms. Isom admits her cases are easy to drop. Moreover, Mr. Garrett’s understanding is that Ms. Isom’s cases were being dismissed by the district attorney’s office. In trying to understand the impact the Brady status would have on an officer, this investigator asked Mr. Wold who has worked in law enforcement for forty-nine years that very question. Mr. Wold states he has witnessed Brady issues in his career, and he explains that once

an officer is on the Brady list, they cannot effectively do their job because that officer no longer possesses credibility, which could lead to reasonable doubt during a criminal proceeding. To this investigator, Mr. Wold appears to be a neutral witness, and he appears to be a witness with a plethora of experience in law enforcement. In addition, the evidence demonstrates Chief Prickett afforded Ms. Isom ample time to resolve her Brady issue. For example, Chief Prickett states his understanding is that Ms. Isom was going to hire an attorney to contest the Brady issue, but almost a year passed, and nothing had changed with her Brady status.

Moreover, Chief Prickett's email does not appear improper. For instance, once Chief Prickett notified Ms. Isom on February 5, 2022, that he could no longer have her participating in any law enforcement activities, there was no point for Ms. Isom to work her scheduled shift that night. Nevertheless, this investigator finds the timing of Chief Prickett's decision to reach out to Mr. Krob questionable. This perception is shared by Mr. Garrett, who states the timing of Chief Prickett's decision was odd, and he is not sure why Chief Prickett chose this time. However, as Mr. Garrett states, he was not sure how many of Ms. Isom's cases were being dismissed, but if the City of Florence could no longer prosecute any of Ms. Isom's cases, it impacted Ms. Isom's ability to perform all the duties related to the job. The timing also raises questions because it is the same day Chief Prickett emailed Mr. Vinelli and stated his services as an on-duty law enforcement officer were no longer needed until February 9, 2022. *See Allegation One and Attachment 20.* This investigator can only speculate that with Mr. Vinelli departing, perhaps Chief Prickett may have found this to be an appropriate time to address this issue as well.

Given the circumstances, it appears Chief Prickett's decision served a legitimate purpose. From a practical standpoint, Ms. Isom could not effectively serve in a law enforcement capacity if prosecutorial offices were dismissing charges filed by her.

This investigator finds it more likely than not that on February 5, 2022, Chief Prickett's conduct was justifiable when he emailed Ms. Isom and stated she was no longer working that night as scheduled, that she was to turn in her patrol vehicle, that she was to turn in her keys and equipment, and that she was being placed on light duty in the front office.

Allegation 6: Ms. Isom alleges that on February 7, 2022, after she submitted her resignation to the City of Florence PD, Chief Prickett unjustifiably disabled Ms. Isom's employee email.

Supporting

Information: Ms. Isom states: "On 2/7/22 I went to check my email, and I got an error message stating my email was locked. I found out Chief changed the codes to doors, so I had no way of getting into the building, and no way of checking my email. I spoke to Corporal Joe Sackett at 5:00PM, and I asked him if he would ask Chief if he

wanted me to come into work on Tuesday. Chief told Corporal Sackett I was to come into work a 7:00 AM, and I that I was to come in the front Door. The office does not open till 8:00AM. I had to bang on the door to get Mason Prickett's attention to open the front door. Mason is Chief's son. Mason and I walked through four coded doors to get into the office I was supposed to be working in."

Refuting

Information: Chief Prickett states: "Isom submitted her resignation letter to me via email on February 7, 2022. Yes, I did have Isom's email access temporarily suspended. Isom was still receiving law enforcement related emails. Matthew Krob told me that Isom was not to have anything to do with the police reports and evidence, but that she could essentially only perform basic tasks. A concern was that if the DA saw she was involved in anything, it would be damaging for our cases. I figured Isom needed to be removed from her email. Isom had returned her equipment, her computer, and her phone, so she would not need access to her email. My experience is that employees only check their emails when they are on the clock."

Chief Prickett concludes: "I had Isom's email access removed on February 5, 2022, I asked if we could temporarily remove her access. I thought if she resolved the Brady, we could have her access turned back on eventually. Isom did a wonderful job when she was doing cop work. Her email access was suspended before she resigned."

Ms. Bath states: "Chief or I are usually the ones who will set up email accounts. We send the IT the information they need to create email accounts. We use AMNET for our IT services. I did not remove Isom's access to her email. I believe Chief is who removed Isom's access to her email. I do not know why Chief removed Isom from her email. I know that received an email from the district attorney's office on 2/11/22 and they stated they wanted to know if Isom still worked here."

Ms. Barth adds: "I was aware Officer Isom was on the Brady list. I am not sure if Chief or Deputy Chief told me. I know Isom's cases were being dismissed in county court, we received an email on her cases that they were dismissed but didn't say why. I remember Isom saying her attorney never called her back to fight her Brady."

Ms. Barth concludes: "I do not perceive anything that Chief did in regard to Cpl. Isom and Deputy Chief Vinelli as retaliation. I do not feel Chief retaliated against them at all. I think Cpl. Isom's access to her email was shut off after she quit."

Comments: The evidence does not substantiate Ms. Isom's assertion that after she submitted her resignation on February 6, 2022, Chief Prickett unjustifiably had her email account disabled. To the contrary, the evidence shows that on February 5, 2022, Chief Prickett contacted AMNET Support, the IT servicer used by the City of

Florence PD, and asked, “Can we temporarily disable a user logon to the computers? FPD55 Ariana Isom.” *See* Attachment 16. When Chief Prickett was asked by this investigator if he had Ms. Isom’s email disabled, Chief Prickett candidly and without hesitation stated, “Yes.” Chief Prickett explains that once it was determined Ms. Isom was no longer going to be working in a law enforcement capacity, due to her Brady status, he had consternation with her still receiving law enforcement related emails. In addition, Chief Prickett states Mr. Krob informed him that Ms. Isom should not be involved with the police reports and evidence, and that a concern of his was if the district attorney’s office learned Ms. Isom was involved in any capacity, it could damage the case. Moreover, Chief Prickett states he figured Ms. Isom needed to be removed from her email. Chief Prickett’s explanation seems plausible. The evidence shows Chief Prickett submitted his request to AMNET a day prior to Ms. Isom’s resignation from the Florence PD. Therefore, there is no evidence to substantiate Ms. Isom’s assertion that Chief Prickett’s conduct was unjustifiably influenced by her resignation. Furthermore, Chief Prickett states he learned of Ms. Isom’s resignation on February 7, 2022. Ms. Isom corroborates this when she states she submitted her resignation letter to Chief Prickett via email on February 6, 2022. *See* Allegation Five. However, Ms. Isom also states she left a signed copy of her resignation in Chief Prickett’s office on February 6, 2022. *See Id.* To this investigator, this does not seem to be of any consequence as Chief Prickett’s inquiry to AMNET was made before Ms. Isom decided to resign.

For the foregoing reasons, this investigator finds it less likely than so that on February 7, 2022, after Ms. Isom submitted her resignation to the City of Florence PD, Chief Prickett unjustifiably disabled Ms. Isom’s employee email.

Other Issues

During the witness interview process, several issues arose this investigator determined were not within the scope of the allegations discussed above.

1. On July 4, 2021, Mr. Dorman states he personally observed Chief Prickett’s consumption of alcohol while he was on duty. *See* Allegation Two.
2. On February 15, 2022, Chief Prickett selected Mr. Humphrey for the newly created commander position. *See* Attachment 14. Mr. Gordon alleges Chief Prickett did not afford him a fair opportunity when considering who he was going to select for the position.
3. [REDACTED]
4. Mr. Sackett alleges Chief Prickett received the Chief of Police job with the City of Florence because he blackmailed his way into it. *See* Allegation One.

Conclusion

With respect to Allegation One, Mr. Vinelli's perceives Chief Prickett's conduct was unjustified when he emailed Mr. Vinelli and requested that he turn in his patrol vehicle and equipment; that Mr. Vinelli's law enforcement services were no longer needed; that Mr. Vinelli was not to show up at the department in uniform; and that Mr. Vinelli was to come through the front office entrance of the police department. There is sufficient evidentiary support to substantiate Mr. Vinelli's assertion that Chief Prickett acted unjustifiably towards him.

Regarding Allegation Two, Mr. Gordon's allegation demonstrates he perceives Chief Prickett unjustifiably threatened to change his and Mr. Dorman's work schedules to 4:00 PM to 2:00 AM. There is insufficient documentation and corroboration from neutral witnesses to substantiate Mr. Gordon's contention that Chief Prickett's conduct was unjustified.

With respect to Allegation Three, Mr. Gordon's perception is that Chief Prickett acted unjustifiably when he emailed the entire Florence PD and stated they would be moving to twelve-hour shifts. There is insufficient evidentiary support to confirm Mr. Gordon's perception. To the contrary, the evidence demonstrates there was a legitimate concern with coverage, and as the chief of police, Chief Prickett was in the best position to address those concerns. Furthermore, the move to twelve-hour shifts never came to fruition, as Chief Prickett collaborated with Mr. Vinelli, Mr. Gordon, and Mr. Dorman in creating an alternative schedule which addressed the coverage concerns.

With respect to Allegation Four, Mr. Dorman's and Mr. Gordon's perception is that Chief Prickett unjustifiably took away Mr. Gordon's and Mr. Dorman's responsibility of approving reports. In addition, Mr. Gordon and Mr. Dorman perceive that Chief Prickett's conduct was influenced in part due to Mr. Gordon and Mr. Dorman going to Mr. Garrett with concerns regarding Chief Prickett. In reviewing the relevant documentation and the witness statements there is not enough proof to substantiate Mr. Gordon's and Mr. Dorman's contention. The witness statements indicate there were concerns universally held within the Florence PD with the amount of time Mr. Dorman and Mr. Gordon were spending in the office. In addition, the statements demonstrate there were issues with the reports when this task was under Mr. Gordon's and Mr. Dorman's charge.

With respect to Allegation Five, Ms. Isom perceives Chief Prickett unjustifiably removed her from working in a law enforcement capacity when he requested that she turn in her patrol vehicle, her equipment, and stated she would be working light duty in the front office. The evidence does not substantiate Ms. Isom's assertion. Ms. Isom's status on the Brady list put herself and the Florence PD in a precarious position. As the evidence shows, it was determined by the city attorney and the district attorney's office that neither office would continue to prosecute cases where Ms. Isom was the charging officer. Although the timing of Chief Prickett's conduct is questionable, due to the closeness in time with Chief Prickett's emails to Mr. Vinelli, Mr. Gordon, and Mr. Dorman on February 5, 2022, it appears Chief Prickett's conduct was justified.

Furthermore, with respect to Allegation Six, Ms. Isom perceives that after she submitted her resignation on February 7, 2022, Chief Prickett retaliated against her when he had her email access disabled. The evidence shows on February 5, 2022, Chief Prickett's emailed the IT servicer used by the Florence PD and requested Ms. Isom's access to the computer logons be temporarily suspended. Therefore, the evidence demonstrates Chief Prickett's conduct preceded Ms. Isom's resignation.

Summary of Findings

- (1) This investigator finds it more likely than not that on February 5, 2022, after Mr. Vinelli raised concerns to city council about police officer pay, human resources, and security issues during a public meeting on January 27, 2022, Chief Prickett emailed Mr. Vinelli and unjustifiably requested that Mr. Vinelli turn in his patrol vehicle and equipment; that Mr. Vinelli's law enforcement services were no longer needed; that Mr. Vinelli was not to show up at the department in uniform; and that Mr. Vinelli was to come through the front office entrance of the police department. In addition, this investigator finds it more likely than not that Chief Prickett's actions were influenced by Mr. Vinelli's raising of concerns to city council.
- (2) This investigator finds it less likely than so that on July 14, 2021, after Mr. Gordon and Mr. Dorman reported concerns with Chief Prickett to the City Manager, Michael Patterson on June 2, 2021, and July 6, 2021, Chief Prickett unjustifiably threatened to change Mr. Dorman's and Mr. Gordon's work schedules to 4:00 PM to 2:00 AM.
- (3) This investigator finds it less likely than so that on January 4, 2022, Chief Prickett's proposal to move the department schedules to twelve-hour shifts was unjustifiably influenced by Mr. Gordon raising concerns with city council.
- (4) This investigator finds it less likely than so that on February 5, 2022, after Mr. Gordon and Mr. Dorman spoke with the Interim-City Manager, Sean Garrett, on January 5, 2022, about concerns with an email Chief Prickett sent out about the 2022 Florence PD directives, Chief Prickett unjustifiably took away Mr. Gordon's and Mr. Dorman's task of approving police reports.
- (5) This investigator finds it more likely than not that on February 5, 2022, Chief Prickett's conduct was justifiable when he emailed Ms. Isom and stated she was no longer working that night as scheduled, that she was to turn in her patrol vehicle, that she was to turn in her keys and equipment, and that she was being placed on light duty in the front office.
- (6) This investigator finds it less likely than so that on February 7, 2022, after Ms. Isom submitted her resignation to the City of Florence PD, Chief Prickett unjustifiably disabled Ms. Isom's employee email.

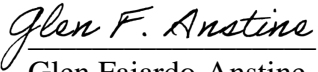
Analysis

Decision-makers for the City of Florence are responsible for assessing whether the facts of this matter support the allegations presented or otherwise establish unacceptable conduct and corrective action. This investigation report is intended to be the tool for making that analysis by identifying the relevant allegations and addressing corroboration of facts. Subjective comment is also shared, but it is important to recognize that another person, such as a judge or a juror, might reach different conclusions based on the same or additional information.

END REPORT

Respectfully submitted,

EMPLOYERS COUNCIL, Inc.


Glen Fajardo-Anstine, Esq
Workplace Investigator

GFA/ew

Attachments