

**DECLARATION OF TIMOTHY T. WILLIAMS, JR.**

I Timothy T. Williams, Jr. declare:

1. I have personal knowledge of the following information and if called as a witness would testify thereto.
2. I have over 29 years of active law enforcement management expertise in the Los Angeles Police Department, a 12,000 member organization.
3. I possess over 41 years of police and investigative procedures, to include the use of informants. During my career in law enforcement as it relates to my investigative assignments I developed, maintained and used informants as needed.
4. From 2003 to the present I have been CEO of T.T. Williams, Jr., Investigations, Inc. where I conduct criminal investigations and study the policies and procedures of law enforcement agencies as well as their implementation of said policies and procedures.
5. I am a Police Procedures Expert and was retained as such by defense counsel to analyze the Police Procedure issues in People v. Dalia Dippolito.
6. As part of my analysis I have reviewed the Boynton Beach Police Department ("BBPD") Informants Directive (Index Code 1622, Effective 23 July 2007), BBPD Informants Directive (Index Code 1622, Effective 22 June 2009), BBPD Directive Release of Information to the Media (Index Code 2422, Effective 28 March 2000), and the deposition transcripts of: Sergeant Paul Sheridan, Sergeant Frank Ranzie, Detective Moreno, Mohamed Shihadeh, Officer George Immler, and Chief of Police Jeff Katz.
7. In my time in law enforcement it was standard for a department to have a policy and procedures manual. This would contain all of the department's procedures and protocol for all aspects of law enforcement conduct. BBPD did not have such a manual. Instead, it had separate directives it would publish sporadically and in a haphazard way with no order. This manner of establishing policies is not standard and creates confusion within the department since it requires personnel to review prior directives to grasp current directives. There was also no supervision in 2009 to ensure that BBPD personnel read and understood new directives. There was also no training given by BBPD with new directives which is substandard and egregious. It is particularly egregious in this case because there was a new directive on the use of informants published in June 22, 2009, a month before the investigation into Ms. Dippolito began. In its investigation, BBPD violated numerous policies listed in the 2009 directive which I will detail below.
8. Another act of egregious misconduct perpetrated by BBPD was during the initial interview of the confidential informant Mohamed Shihadeh. This three hour interview was not recorded by BBPD. Due to the seriousness of the allegations of Ms. Dippolito wanting to have her husband killed, procedurally the interview should have been recorded to preserve the integrity of the investigation. This serious oversight potentially compromised the integrity of the subsequent investigation. Mr. Shihadeh later admitted at his deposition

that when he first spoke with BBPD officers, he did not believe that Ms. Dippolito was a real threat to her husband. Mr. Shihadeh also testified at his deposition that he only wanted BBPD to speak with Ms. Dippolito and that BBPD reassured him that Ms. Dippolito would not be arrested.

9. BBPD officers did not review the confidential informant package with Mr. Shihadeh nor did they explain its contents to him. It is imperative to any investigation utilizing an informant that the informant be aware of the gravity of being an informant and its purpose. BBPD tricked Mr. Shihadeh into signing the confidential informant packet by telling him that the signature was required on order for him to remain anonymous. Mr. Shihadeh's intent in signing the CI agreement was to remain confidential, nothing more. Not reviewing the confidential informant packet with Mr. Shihadeh violated BBPD policy and procedure.
10. BBPD conducted no vetting of Mr. Shihadeh to determine his reliability and credibility. Mr. Shihadeh was a civilian informant that had no prior interaction with BBPD. This required serious vetting. At the time he entered BBPD, he had a domestic violence abuse charge against him while Ms. Dippolito had no criminal history and no pending criminal investigation against her. In addition to this, a sexual relationship between Mr. Shihadeh and Ms. Dippolito should have raised red flags, but BBPD ignored this and did nothing to perform further due diligence on the domestic abuse charge. BBPD also ignored the fact that Mr. Shihadeh claimed he was given a range rover by Ms. Dippolito. They made no attempt to contact the dealership where the range rover was purchased or any other effort to confirm this allegation. This lack of vetting into a new informant and lack of due diligence violated BBPD policy and procedure.
11. Mr. Shihadeh and Ms. Dippolito had a past sexual relationship. A thorough initial interview and investigation into Mr. Shihadeh would have determined this important fact. BBPD should have considered possibilities such as the possibility that Mr. Shihadeh may have been a disgruntled former lover or have had other motive for making said allegations against Ms. Dippolito. A thorough vetting of Mr. Shihadeh at the initial interview would have brought to light potential motives Mr. Shihadeh had when reporting Ms. Dippolito's alleged murder for hire plot. BBPD was required to take this past sexual relationship seriously and investigate how this effected Mr. Shihadeh's allegations. Not doing so was a violation of BBPD policy and procedure.
12. Several times prior to the investigation beginning, and while it was ongoing, Mr. Shihadeh told BBPD that he did not want to be a part of the investigation and did not want to continue helping BBPD as an informant. BBPD policy required that Mr. Shihadeh stopped being used as an informant immediately. However, BBPD continued to utilize Mr. Shihadeh and even threatened him with prosecution if he failed to cooperate with them. Not deactivating Mr. Shihadeh as an informant and coercing him into continuing to work as an informant were both clear violations of BBPD policies and procedures. These were serious and flagrant policy violations that constituted egregious misconduct by BBPD.

13. BBPD had Mr. Shihadeh meet Ms. Dipplito in Chili's to discuss the murder of her husband. At this meeting, BBPD allegedly sent Mr. Shihadeh into the meeting without being wired and without undercover operatives. Allegedly, Mr. Shihadeh was not wired because the wiring device was not working. This was a major tactical and risk management problem. Mr. Shihadeh could have coerced and threatened Ms. Dippolito into the act of solicitation when she met with the undercover officer Widy Jean. The meeting should have immediately been cancelled when it was discovered the wiring device was not working. No meeting should have taken place between Mr. Shihadeh and Ms. Dippolito until an effective monitored meeting could have been established. Procedurally, this type of meeting needed to be monitored and supervised to maintain control of the informant. It was a violation of BBPD policy and procedure for this meeting not to be properly monitored.
14. COPS television show was at the BBPD during the time that the department was investigating Ms. Dippolito. BBPD created a staged crime scene for COPS to film Ms. Dippolito being told her husband had been killed. The whole thing with the COPS show was ethically wrong. You do not trick an arrestee by staging and filming a fake crime scene and then trick them once again into signing a waiver so their face can legally be seen on television, which was the case here. You don't create a fake crime scene to make good television. This was in violation of law enforcement and BBPD policy and procedure.
15. From August 1-5, 2009, there were over 500 phone calls from Mr. Shihadeh to Ms. Dippolito that were not recorded. BBPD did not monitor or supervise these calls and had no control over informant Mr. Shihadeh during the time these calls were taking place. This was in clear violation of BBPD's policy and procedure on informants. The sheer volume of calls is alarming and suggestive of undue coercion by Mr. Shihadeh over Ms. Dipolito. This constitutes egregious misconduct by BBPD for allowing all of these call being made and for not supervising them. Current BBPD Chief of Police Jeff Katz at his November 4, 2015 deposition agreed that not recording or monitoring these calls between Mr. Shihadeh and Ms. Dippolito was a violation of BBPD directives.
16. BBPD did not follow proper protocol for a murder for hire investigation because it was on a schedule and under the time constraints of being filmed by COPS. These time constraints removed the integrity of the investigation. BBPD should have conducted a confidential investigation to ensure the safety of Mr. Dippolito and the apprehension of Ms. Dippolito once the allegations of solicitation were in place. Further, COPS should not have been involved in this type of an investigation. It was a violation of BBPD policy and procedure to conduct an investigation with time constraints dictated by a television show rather than exigent circumstances.
17. These were and are very serious allegations where the investigation was conducted in a manner that was procedurally wrong. BBPD did not conduct its investigation in a manner reflective of the facts that Ms. Dippolito had no criminal background, she was not being investigated for any other crime at the time Mr. Shihdaeh made the allegations against her, and where the

informant is a former lover that walks in off the street and accuses Ms. Dippolito of wanting to kill her husband. Each and every time BBPD acted in a manner that was procedurally wrong it was in violation of BBPD policy and procedure. Based on the volume of flagrant and serious policy violations by BBPD and the lack of a professional investigation, Ms. Dippolito's right to a fair and unbiased trial has been jeopardized.

The above expert opinions are clearly based on recognized standards coupled with my education, background, and experience as it relates to police procedure issues.

Executed on this day, November 17, 2015 in the County of Los Angeles in the State of California.

A handwritten signature in blue ink, consisting of several overlapping, horizontal, wavy lines that form a stylized representation of the name Timothy T. Williams, Jr.

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Timothy T. Williams, Jr.