

**IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

JOHN E. REID AND ASSOCIATES, INC.,)
123 W. Madison Street, Suite 900)
Chicago, IL 60602)

Plaintiff,)

v.)

JAMES L. TRAINUM)
1639 Potomac Avenue, SE)
Washington, DC 20003)

Defendant.)

Case No.: 2024-CAB-007957

COMPLAINT

NOW COMES Plaintiff, John E. Reid and Associates, Inc. (“Reid”), by its undersigned counsel, and for its Complaint against James L. Trainum (“Trainum”), alleges as follows and demands a trial by jury as to all counts so triable:

NATURE OF THE ACTION

1. This Complaint is an action brought by Reid to redress defamation and other related wrongful conduct by Trainum, a retired DC Metropolitan Police detective and a current private consultant who has made multiple statements defaming Reid and disparaging its products and services to news media outlets beginning in January 2024.

2. Reid is a company that for many years has provided training programs and other services throughout the United States and abroad to law enforcement agencies, all branches of the United States military and other military and intelligence communities, and businesses as to interview and interrogation measures. Reid’s clients in the United States have included the United States Marshals Service, Federal Bureau of Investigation (“FBI”), Drug Enforcement

Administration (“DEA”), Federal Reserve Board, United States Department of State, and all branches of the United States Military. Reid’s foreign clients have included the Dubai Police Force, the Canadian Special Operations Forces Command Department of National Defense, and the Ontario and Ottawa Departments of Public Safety. Reid maintains and develops clients and markets its services in the District of Columbia, Michigan and the State of Washington and conducts training seminars there.

3. The “Reid Technique”® is a trademark and product of Reid contained in the textbooks and other publications it markets and sells to customers. Reid’s services include teaching the Reid Technique to customers as a method for interviewing, questioning, and interrogating subject persons. The Reid Technique is a structured interview and interrogation process that consists of three stages: fact analysis, investigative non-confrontational interview, and interrogation. Vital to the instant case is that the Reid Technique does *not* involve and prohibits: striking or assaulting a subject, making any promises of leniency, denying a subject any rights, conducting excessively long interrogations, and denying a subject any physical needs. This information has been readily publicly available in numerous places, including on Reid’s website. This information is also contained in Reid’s publicly available textbooks, which teach the Reid Technique. Trainum knew this when he made his false statements about the Reid Technique.

4. On July 24, 2024, an article was published in the Detroit Metro Times, entitled “A Detroit detective terrorized young men into making false confessions. Some are still behind bars.” (the “Detroit Metro Times Article”). The Detroit Metro Times Article was written by Steve Neavling, and still remains available for viewing in print and on the newspaper’s website.¹ The

¹ A true and correct copy of the Detroit Metro Times Article is attached as **Exhibit A**, and is also available at <https://www.metrotimes.com/news/a-detroit-detective-terrorized-young-men-into-making-false-confessions-some-are-still-behind-bars-36872484>

article describes a series of wrongful criminal convictions obtained against defendants in cases investigated by Detective Barabara Simon of the Detroit Police Department, and describes the interrogations and coerced confessions that led to those convictions.

5. The Detroit Metro Times Article first describes at length the misconduct engaged in by Ms. Simon and others in the Detroit Police Department that led to the coerced confessions, including locking suspects in small rooms for hours, denying suspects access to attorneys and a phone call, confining suspects without arrest warrants or legal justification, physically abusing and choking suspects, threatening witnesses that false crimes will be pursued against them if they did not incriminate suspects, promising to set suspects free if they confessed to crimes, promising that a suspect would be subject to lesser charges if they signed false confessions, drafting false confessions without input from the suspect and demanding they sign them, etc.

6. The Detroit Metro Times Article also describes the release of certain defendants from incarceration and their subsequent recovery of millions of dollars in damages arising from their civil claims against the City of Detroit and Ms. Simon, for the abuse they sustained arising out of the illegal, coerced, and wrongful confessions, convictions, and incarcerations.

7. Immediately after describing this egregious misconduct and the resulting massive civil penalties, the author then begins a new subheading entitled “The Reid technique,” in which he extensively relies upon and repeats what he had been told by Trainum, who is prominently mentioned in the article. In that section of the article, the author writes that “[Trainum] says Simon uses a controversial method of interrogation known to create false confessions. Called the ‘Reid Technique,’ the method is aimed at increasing suspects’ anxiety by creating a high-pressure environment, such as confining them to a room for hours and saying they are going to spend the rest of their lives in prison.”

8. Trainum's statements are false. Ms. Simon was not using the Reid Technique. The Reid Technique does not involve confining suspects in small rooms, telling them they will spend life in prison, or denying suspects their rights.

9. The author further quotes Trainum and repeats his statements about the Reid Technique: "The suspects are presented with a situation where they feel like they are going to get screwed,' Trainum tells the *Metro Times*. 'They are being guaranteed that they are going to be convicted by an authority figure. Then they start talking about leniency and say the judge will like it much better if they confess. They'll say, 'If you take responsibility, they are going to go much lighter on you.'"

10. Immediately after these quotes, the author relies on what he had been told by Trainum and states that the Reid Technique has been banned in several European countries, describes the Reid Technique as a "manipulative" tool to "extract a confession," and again quotes Trainum in stating that, "[t]o reduce false confessions, Trainum says the U.S. needs to abolish the Reid Technique."

11. Trainum communicated with the author shortly before the publication of the Detroit Metro Times Article, made statements of alleged fact about the Reid Technique in words that are repeated or substantially similar to those used in the Article, and did so with the expectation that the statements would be published and circulated. Trainum's statements falsely charge that the incidents of misconduct described in the article by Barbara Simon and others are part of the Reid Technique. In reality, none of the wrongful conduct described in the Detroit Metro Times Article is part of the Reid Technique and is expressly not taught, condoned or encouraged by Reid in its textbooks, training materials, seminars, and other resources, and Trainum knew this when he made these false statements.

12. In addition to the Detroit Metro Times Article, an article was published on January 17, 2024 by Cascade PBS Media, entitled “Amanda Knox testifies in Olympia for stricter interrogation laws -- in support of a bill that would void interview statements if a court finds deceptive police tactics, Knox described her 53-hour questioning in Italy” (the “Cascade Article”). The Cascade Article was written by Scarlet Hansen, and still remains available for viewing on the internet.² The article describes the infamous case of Amanda Knox, who was wrongly convicted of murdering her roommate while studying abroad in Italy, and was subjected to a 53-hour interrogation by officers who ultimately coerced her to make false statements that were the basis of her conviction.

13. The author relies on what she had been told by Trainum shortly before the publication and states “that virtually every law enforcement agency uses the Reid Technique,” in which “Officers may urge suspects to confess by making unauthorized promises of leniency for doing so, such as a lighter sentence.”

14. Trainum’s statements to the author were repeated or were substantially similar to those stated in the article. Trainum’s statements, however, are false. The Reid Technique does not include, nor does Reid condone, urging suspects to confess by making unauthorized promises of leniency for doing so.

15. Trainum’s statement that the officers who questioned Amanda Knox for a 53-hour period were utilizing the Reid Technique is also false, as excessively long interrogations are not part of or permitted by the Reid Technique.

² A true and correct copy of the Cascade Article is attached as **Exhibit B**, and is also available at <https://www.cascadepbs.org/politics/2024/01/amanda-knox-testifies-olympia-stricter-interrogation-laws#:~:text=Amanda%20Knox%2C%20a%20Washingtonian%20who,deceptive%20tactics%20in%20police%20interrogations>.

16. Trainum's statements about the Reid Technique falsely disparage Reid's products and services and defame Reid. First, the statements defame Reid and disparage the Reid Technique as they falsely correlate the Reid Technique to the improper and unlawful tactics utilized by Barbara Simon and other police officers that are described in the articles. The conduct described is not the Reid Technique. Trainum knew that his statements were false or recklessly disregarded the truth when he made them.

17. Through Trainum, the aforementioned articles attempt to assign blame for what occurred in the described cases. Besides the police officers and prosecutors, the articles and Trainum also blame Reid for being the proponent of coercive tactics that were used by those officers and prosecutors in eliciting coerced and wrongful confessions. In the articles, Trainum falsely represents that obtaining coerced confessions after confining subjects without justification, making false promises of leniency, long hours of questioning without food, etc., is synonymous with the Reid Technique.

18. Many of Reid's customers and potential customers, who are familiar with the Reid Technique, have read and/or will read the Detroit Metro Times Article and/or the Cascade Article. Reid's reputation and business have been harmed, and will continue to be harmed, by Trainum's statements.

THE PARTIES

19. Reid is a corporation incorporated under the laws of the State of Illinois. Reid's principal place of business is located in Chicago, Illinois. Reid is the creator, owner and developer of the Reid Technique, which Reid markets, sells and teaches to customers. The Reid Technique is a widely used approach to question subjects in the course of interviews and interrogations. Reid's experienced team of instructors provides training seminars to law enforcement and other security

personnel. Since its training programs were first offered in 1974, more than 500,000 professionals in the law enforcement and security fields have attended Reid's programs. Participants come from private sector organizations such as retail, finance, health care, manufacturing, gaming, education, and insurance, among others. Participants also come from all levels of law enforcement and government including every branch of the United States Military. Reid has presented programs in the United States, Canada, Europe, Asia, and the Middle East. Reid has substantial clientele in the District of Columbia, Michigan, and Washington State. Reid's customers and prospective customers in those locations and elsewhere know of the Reid Technique and readily recognize references to it.

20. Trainum is an individual domiciled in and residing in Washington D.C. Trainum is a retired DC Metropolitan Police detective, and currently works as a private consultant and expert witness for parties claiming they are victims of false confessions and other police misconduct.

JURISDICTION AND VENUE

21. The Court has personal jurisdiction over Trainum as he is domiciled in the District of Columbia.

22. Venue is proper in this Court as Trainum made false statements complained of herein while he was in the District of Columbia and because Reid is asserting a civil action seeking damages in excess of \$10,000.

ALLEGATIONS COMMON TO ALL COUNTS

A. The Reid Technique

23. The Reid Technique was developed by John E. Reid and was first taught to investigators in 1974. Since that time it has been refined and updated by Reid and remains as the core component of the textbooks and other publication products sold by Reid as well as the training

and teaching services it provides to its customers. Reid has marketed and sold its products and services relating to the Reid Technique to thousands of individuals in business, law enforcement, and government organizations, including the military.

24. The Reid Technique is widely published and available for review. Reid's primary textbook, *Criminal Interrogations and Confessions*, 5th Edition (2013), describes and teaches the Reid Technique in substantial detail. Reid's website also has information regarding the Reid Technique, including educational handouts, recent court decisions and media relating to Reid, among other materials.

25. The Reid Technique is a structured interview and interrogation process that consists of three stages: fact analysis, investigative non-confrontational interview, and interrogation.

26. The factual analysis stage consists of reviewing the case facts and evidence to identify the potential scope of suspects and their characteristics, as well as possible motives.

27. Based on an analysis of the facts, the Reid Technique then calls for the investigator to prepare an interview strategy, including a list of issues and questions to raise with a subject. Interview questioning generally includes, but is not limited to, background information regarding the subject and his or her recollection of the incident in question. The interview is non-accusatory, and the interviewer is to be neutral and objective in seeking information from the subject.

28. Based on information gathered during the interview stage and the investigation, the investigator can either eliminate the subject as truthful, continue the investigation of the subject, or initiate interrogation of the subject. The interrogation phase consists of nine steps, which are designed to create an environment conducive to the subject telling the truth about what they did and to relate details regarding the commission of a crime or incident.

29. The Reid Technique does not involve and prohibits: striking or assaulting a subject, making any promises of leniency, denying a subject any rights, conducting excessively long interrogations, or denying a subject any physical needs. All of this information is publicly available upon even the most cursory of searches. For example, Reid's website provides a "Resources" section that includes many "Investigator Tips" providing detailed information about the use of the Reid Technique. Reid also publishes numerous textbooks which are available to the public detailing the use of the Reid Technique. Criminal Interrogation and Confessions, 5th Edition (2013), is the primary textbook used for teaching the Reid Technique.

30. For all relevant time periods, Reid's website has contained a substantial number of resources, articles, and teaching aids that are publicly available, easy to access, and make clear that the methods described in the Detroit Metro Times Article and Cascade Article are not part of the Reid Technique.

31. Reid's publicly available "Core Principles and Best Practices" include the following guidelines:

- Do not make any promises of leniency
- Do not threaten the subject with any physical harm or inevitable consequences
- Do not deny the subject any of their rights
- Do not deny the subject the opportunity to satisfy their personal needs
- Withhold information about the details of a crime from a subject so that if a subject confesses and discloses information about the crime, their disclosure will help confirm the authenticity of the confession
- Exercise special caution when questioning juveniles or individuals with mental or psychological impairments
- Always treat subjects with respect
- Conduct an interview before any interrogation; absent a victim life-saving circumstance the investigator should conduct a non-accusatory interview before engaging in any interrogation
- Conduct an interrogation only when there is a reasonable belief that the subject committed the incident under investigation or is withholding relevant information
- Attempt to verify any alibi before interrogating a subject
- When interrogating a non-custodial subject, do not deprive their freedom to leave the room

- Do not conduct excessively long interrogations
- Electronically record the interview and interrogation
- A confession does not end an investigation.

32. An Investigator Tip on Reid’s website, entitled “A Description of the Reid Technique,” published on November 1, 2018, provides that the “basic principles” of the Reid Technique include:

- “Do not make any promises of leniency”
- “Do not threaten the subject in any way”
- “Do not deny the subject any of their rights”
- “Do not conduct excessively long interrogations.”
- “Do not deny the subject the chance to satisfy their physical needs.”
- “Exercise caution when interviewing juveniles or persons with mental or emotional disabilities.”

33. All of these principles are repeated in another Investigator Tip published on June 8, 2021, entitled “False Confessions: The Issues to be Considered,” which details the types of behaviors that courts have found to be coercive and that investigators should not utilize during the interview or interrogation process, such as threats, promises of leniency, denial of rights, etc.

34. The Resources section on Reid’s website also features articles describing the Reid Technique in detail, including the core principles listed above and other best practices. These articles include: *How the Courts View the Reid Technique* (2016) and *The Reid Technique: A Position Paper* (2017).

35. Reid’s primary textbook further expands on this information. The 3rd Edition (1986) of that textbook provided, in relevant part:

- The clearest example of an interrogation practice that will void a confession is the infliction of physical force or pain upon the person under interrogation, because it is an uncontestable fact that harm of this nature may produce a confession of guilt from an innocent person. (p. 214)
- This is also true as regards indirect physical harm; for instance, an unduly prolonged, continuous interrogation, especially by two or more interrogators working in relays, or the

deprivation of food, water, or access to toilet facilities for an unreasonable period of time. (p. 214)

- A threat of physical harm may have a similar effect – the extraction of confessions from innocent persons. Similarly, an interrogator’s promise to a suspect that if he confesses he will go free or receive only a lenient penalty will nullify the confession because such a promise may induce an innocent person to confess rather than to risk criminal prosecution or severe punishment. (p. 214)
- Of the various forms of indirect force, the one that most suggests confession coercion is the participation of multiple interrogators over a lengthy period of time . . . Moreover, as to the time factor, rarely will a competent interrogator require more than approximately 4 hours to obtain a confession from an offender, even in cases of a very serious nature. (p. 310)
- With regard to the threat factor of coercion, the most obvious example of conduct that will invalidate a confession is when an interrogator leads a suspect to believe that unless he confesses, he will be subjected to a loss of life or other bodily harm. The belief does not require a specific expression from anyone to that effect; for example, it may result from an act of physical abuse to some other presumed suspect within sight or hearing of the one under interrogation. (p. 311)

36. These same concepts are reiterated throughout the 4th Edition (2001) and current 5th Edition (2013) of the textbook.

37. In June 2023, Reid published an Investigator Tip entitled “Reid Policy on the Use of Deception During an Interrogation,” and it included the following information: “Given current judicial and legislative trends regarding the use of deception during an interrogation, investigators should adopt a general practice of avoiding misrepresentations concerning incontrovertible or dispositive evidence.”

B. Trainum’s Knowledge of the Reid Technique

38. At all times relevant, Trainum has had knowledge of the Reid Technique, what it entails, and the conduct that Reid condones and does not condone.

39. In the Cascade Article, Trainum states that he was trained to use the Reid Technique.

40. At all times relevant, Trainum had access to all publicly available materials regarding the Reid Technique, as described above, including Reid's website and textbooks.

41. From March 3-6, 2008, Trainum attended a three-day Interview and Interrogation program in Washington D.C., followed by a one-day Advanced Interrogation program on the Reid Technique.

42. In 2012, Trainum purchased two books published by Reid about the Reid Technique, "Anatomy of Interrogation Themes" and "The Investigator Anthology".

43. Trainum received on a regular basis Reid's informatory email publications and links to Reid's Investigator Tips that include information on false confession issues and proper investigation procedures.

44. On June 8, 2021, Trainum opened a link to an Investigator Tip prepared by Reid entitled "False Confessions; The Issues to be Considered," which included the following information:

To summarize our discussion up to this point, the primary causes and contributing factors for false confessions are the following:

- Physical abuse of the subject
- Threats of physical harm
- Threats of inevitable consequences
- Promises of leniency
- Denial of rights
- Denial of physical needs
- Excessively long interrogations
- Disclosure of crime details
- Failure to properly take into account the subject's mental limitations and/or psychological disabilities
- Failure to properly modify approaches with socially immature juveniles
- Failure to properly corroborate confession details.

The best way to avoid false confessions is to conduct interrogations in accordance with the guidelines established by the courts and to adhere to the following Core Principles and Best Practices:

- Do not make any promises of leniency
- Do not threaten the subject with any physical harm or inevitable consequences
- Do not deny the subject any of their rights
- Do not deny the subject the opportunity to satisfy their physical needs
- Withhold information about the details of the crime from the subject so that if the subject confesses the disclosure of that information can be used to confirm the authenticity of the statement
- Exercise special cautions when questioning juveniles or individuals with mental or psychological impairments
- Always treat the subject with dignity and respect
- Conduct an interview before any interrogation. Absent a life-saving circumstance the investigator should conduct a non-accusatory interview before engaging in any interrogation
- Conduct an interrogation only when there is a reasonable belief that the suspect committed the crime under investigation or is withholding relevant information
- Attempt to verify the suspect's alibi before conducting an interrogation
- When interrogating a non-custodial suspect, do not deprive the suspect from his freedom to leave the room
- Do not conduct excessively long interrogations
- When a suspect claims to have little or no memory for the time period when the crime was committed the investigator should not lie to the suspect concerning incriminating evidence
- Electronically record the interview and interrogation
- The confession is not the end of the investigation.

Following the confession, the investigator should investigate the confession details in an effort to establish the authenticity of the subject's statement, as well as attempt to establish the suspect's activities before and after the commission of the crime.

45. On September 24, 2019, Trainum opened a link to a Reid document that had been published in August 2019 entitled "What Questions Should be Asked to Determine the Voluntariness and Validity of a Subject's Confession?," which included information as follows:

While there are numerous issues to consider, in the process of evaluating the voluntariness and validity of a subject's confession, the following questions may be helpful in making such an assessment.

The recording

Was the entire contact with the subject recorded, both the interview and the interrogation?

Was there any time when the discussion with the subject was not recorded? If so, what was the reason?

Subject Rights

Was the subject in custody or was he/she free to leave?

If in custody, was the subject properly advised of his/her rights?

Did the subject demonstrate a knowing and intelligent waiver?

Did the subject exercise any of their rights in an unequivocal manner at any time during the process? Was such an invocation honored?

If the subject is a juvenile, were the rights properly explained to the subject?

Were any of the subject's rights denied during the interrogation process:

Was the subject allowed to use the washroom facilities?

Was the subject provided any drink or food?

Was the subject allowed to sleep?

Subject Attributes

Does the subject have or exhibit any mental or psychological factors that would affect his/her ability to make a voluntary or true statement?

Is there any language issue that may have precluded the subject's ability to properly understand the process, questions or situation?

Does the subject have prior experience with law enforcement?

Does the subject have the cognitive ability to make a knowing and intelligent waiver?

Was the subject under the influence of drugs or alcohol during the interrogation?

Was the subject suffering from any physical injury during the interrogation?

If the subject is a juvenile, does the law require that a parent or guardian be present during the interrogation? If yes, were they contacted?

Length of the interrogation

How long did the interview of the subject last?

How long did the interrogation of the subject last?

Did the interrogation take place during the subject's normal waking hours?

Did the interrogation exceed a reasonable length of time based on the statements made by the subject?

The interrogation process

Did the subject have access to the door? Was it unlocked?

Did the investigators make any threats of harm or inevitable consequences?

Did the investigators make any promises of leniency?

Did the investigators reveal details of the crime to the subject?

Did the investigators show the subject pictures of the crime scene?

Did the investigators engage in any coercive tactics?

Did the investigators deny the subject any of their rights?

Did the investigators deny the subject the opportunity to use the restroom? to get something to drink or eat? to sleep?

The confession

Did the subject provide details that were consistent with the crime evidence?

Did the subject provide details that have been withheld by the police?

Did the subject provide details that the police did not know?

Did the subject write the written document? If not, did he read it or just sign it?

Did the subject provide the content of the written statement or was it written for him?

46. On May 22, 2022, Trainum opened a link to a Reid Investigator Tip that had been published on April 25, 2022, entitled "Principles of Practice: How to Conduct Proper Investigative Interviews and Interrogations," which included the following information:

Our purpose is to reinforce the core principles of practice that we feel are essential in conducting effective interviews and interrogations and are the principles of practice that we teach in all of our training programs.

The Essential Elements of the Investigative Interview

- The initial contact with the subject (absent a life-saving circumstance) should be a non-accusatory, non-confrontational interview.

- All interviews should be conducted in accordance with the guidelines established by the courts; such as the appropriate advisement of rights; the presence of a parent or guardian for a juvenile; etc.
- Throughout the interview the investigator should maintain a neutral, objective fact-finder demeanor. During the interview the investigator should not engage in any accusatory or confrontational behaviors.
- The interview should begin with casual conversation, biographical information, employment information, etc. to acclimate the subject to the interview process, develop rapport and to develop the subject's behavioral baseline
- The investigator should use open-ended questions to develop the subject's statement, story, version of events or explanation of what happened. In the interview the investigator should do about 20% of the talking and the subject should do about 80%.
- The investigator should observe the subject's verbal and non-verbal behaviors as a guide for the interview questions – suggesting when the subject may be editing, fabricating or withholding relevant information, suggesting the need for additional follow-up questions It is important to remember that there is no behavior unique to deception – behavior must be evaluated in context and against the subject's normal behaviors. There are numerous factors that can affect a subject's behavior during the interview, including culture, mental and psychological impairments, physical condition, drugs and alcohol, etc. which the investigator must consider.
- A subject's verbal and nonverbal behaviors are not a substitute for evidence, but can be helpful in identifying when a subject may be less than candid during the interview, prompting additional questions which may in turn lead to the discovery of additional incriminating facts or evidence
- The investigator should evaluate the subject's statement in conjunction with the case facts and evidence. If the subject offers an alibi attempt to verify its authenticity.
- The investigator should not tell the subject what they already know about the case – but rather should see if the subject's statement is consistent with what is known or if the case facts and evidence contradict what the subject has stated.
- The investigator should utilize investigative and behavior-provoking questions during the interview.
- The investigator should not reveal all of the details about the crime (it is critical to withhold crime details that can later be used to confirm the authenticity of the subject's acknowledgment of what he did)
- Do not show the suspect crime scene photographs that reveal corroborating details

- The investigator should evaluate the subject's possible involvement in the issue under investigation based on the investigation, case facts, factual evidence and information developed during the interview/investigation
- The interview (and any subsequent interrogation) should be recorded.

The Essential Elements of the Interrogation Process

- Interrogations should only be conducted when the case investigative information indicates the subject's probable involvement in the commission of the crime. The purpose of an interrogation is to learn the truth.
- The investigator should conduct all interrogations in accordance with the guidelines established by the courts - advisement of rights; presence of a parent or guardian for a minor; length of time, etc.
- The investigator should always treat the subject with dignity and respect
- The investigator should not make any promises of leniency, threats of harm or inevitable consequences, or physically abuse the subject
- The investigator should not conduct interrogations for an excessively lengthy period of time
- The investigator should not deny the subject any of their rights
- The investigator should not deny the subject the opportunity to satisfy their physical needs
- In a non-custodial interrogation do not deprive the subject of the opportunity to leave the room
- The investigator should exercise special cautions when questioning juveniles or individuals with mental or psychological impairments – do not lie to these subjects about evidence
- The investigator should never manufacture evidence implicating the subject
- When a suspect claims to have little or no memory for the time period when the crime was committed the investigator should not lie to the suspect about incriminating evidence
- The investigator should begin the interrogation with a statement of involvement
- Following this initial statement the investigator should engage in a monologue presentation (theme) in which he/she proposes to the suspect reasons and motives that will serve to psychologically justify or excuse their behavior – not legally justify or excuse their behavior
- The investigator should attempt to place the blame for what the suspect did on some person or set of circumstances other than the suspect himself and build the subject

up as “a good, honest hard-working person who made a mistake in judgment due to ...”

- The investigator should focus the theme on why the suspect committed the act, not if
- The investigator should use an alternative question to develop the subject’s initial acknowledgement of what they did: “Was this the first time you did something like this or has it happened many times before?”
- When the subject acknowledges what they did, the investigator should ask open-ended questions to develop corroborating information – the location of the murder weapon or bloody clothes; how the subject gained entry into the building; where the subject sold the stolen jewelry, etc. Corroboration is an essential element to establish the authenticity of the subject’s statement.
- The interrogation should be recorded.
- The subject’s confession is not the end of the investigation...the investigator should continue to develop additional details about the subject’s behavior before and after the commission of the crime and to verify the details of his statement of involvement

47. In June 2023, Reid published an Investigator Tip entitled “Reid Policy on the Use of Deception During an Interrogation.” Trainum opened the link to this Investigator Tip on July 7, 2023, and it included the following information:

Given current judicial and legislative trends regarding the use of deception during an interrogation, investigators should adopt a general practice of avoiding misrepresentations concerning incontrovertible or dispositive evidence.

48. In Trainum’s 2016 book, “How the Police Generate False Confessions,” he acknowledges that Reid teaches that promises of leniency and threats of harm are improper. Trainum states that Reid “has numerous publications regarding the avoidance of improper interrogation tactics.” Trainum further states as follows:

- “Tactics such as threats of physical harm or inevitable consequences or promises of leniency are, of course, considered by Reid teachers and other experts as improper, as well as denying the suspect any of their rights or the opportunity to satisfy their physical needs, such as thirst or having access to a bathroom. Juveniles and persons with mental disabilities are now recognized as having a higher likelihood of falsely confessing.” (p. 96)

- “To their credit, the Reid Institute has taken the lead here. In the 3rd edition of Criminal Interrogation and Confessions, published in 1983, there was nary a mention of the problem of false confessions or the need to confirm the reliability of the details contained within. Later editions are almost double in size, dedicating much publications regarding the avoidance of improper interrogation tactics and confession evidence contamination.” (pp. 95-96)
- “The Reid Institute and others explicitly warn against direct threats of physical harm, threats of inevitable consequences (such as surety of a conviction or long prison sentence), and any promise of relief or leniency from those consequences if they confess.” (p. 122)
- “They (Reid) also warn that the use of deception in the interrogation of a ‘youthful suspect with low social maturity’ or ‘suspects with diminished mental capacity’ may lead to a false confession.” (p. 124)
- “All this said, for many, the bottom line is that the interrogation tactics taught by the Reid Institute have been proved to be extremely effective in gathering true confessions from guilty suspects. Their use has resulted in untold numbers of crimes being solved.” (p. 125)

C. Trainum Defames Reid Through His Statements to the Reporters for Detroit Metro Times and Cascade PBS

49. On July 24, 2024, the Detroit Metro Times Article was published. The article describes a series of wrongful criminal convictions obtained against defendants in cases investigated by Detective Barabara Simon of the Detroit Police Department, and describes the interrogations and coerced confessions that led to those convictions.

50. The first section of the article describes in detail the misconduct allegedly engaged in by Ms. Simon and others in the Detroit Police Department, including but not limited the following excerpts:

- In the 1990s and early 2000s, [Ms. Simon] engaged in investigative misconduct, illegally held suspects without a warrant, denied them access to an attorney or phone call, threatened them, and made false promises of leniency, judges and prosecutors would later determine. Suspects who refused to talk without an attorney were confined to jail cells infested with cockroaches, rats, and other vermin. Her tactics led to false confessions and fabricated witness statements.
- Craighead says he was confined for hours to a four-foot by four-foot locked room with a desk and steel grates on the window. He was left alone with a growing migraine headache

and nothing to eat or drink. When he pounded on the door and demanded to be let out, Simon told him to "sit down and shut up," Craighead says.

- When Craighead sat face to face with Simon, he repeatedly refused to answer questions. Simon claimed she had evidence linking him to the murder. Police took him to different rooms and left him alone for hours. After 1 a.m., more than seven hours after he was taken into custody without a warrant, a lawyer, or a phone call, Simon told Craighead he would be released and still make it to work for his 5 a.m. shift if he agreed to take a polygraph. If he didn't, he would remain in custody, Simon told him, according to court records.
- After about an hour of questions, Simon told Craighead he failed the polygraph, a conclusion that was later contradicted by another test. Falsely claiming the polygraph was admissible in court, Simon leaned in and said, "Your wife is going to find a new husband and your kids are going to call somebody else daddy if you don't tell me what you did because you're going to jail for the rest of your life without parole," Craighead recalled in a deposition. After he refused to confess to a murder that evidence would later show he didn't commit, Simon placed Craighead in handcuffs and fingerprinted him. When asked if he could go home as promised, Craighead says Simon laughed at him. After 4 a.m., Craighead was placed in a cold jail cell with no blanket or pillow. The only place to sit was a wooden bench with screws poking out. Mice and cockroaches scurried about, he says.
- "We got you," Craighead recalled Simon telling him. "We know that you shot Chole, and we can prove it." As Craighead would later find out, the police had no evidence linking him to the murder. To Craighead's surprise, Simon presented him with a detailed narrative about what went down on the night of Pruett's murder in July 1997: He and Craighead got into a fight. Pruett pulled out a gun, and the pair struggled for control of it. The gun went off. Pruett died. The alleged confession, which Simon handwrote, was contradicted by forensic evidence, which showed Pruett was shot four times in the back execution-style from a distance of at least two feet. In her interview with Craighead, Simon insisted the shooting was an "accident" and said, "You don't seem like the kind of person that would kill or rob your best friend, so you must have had a reason," according to court records. Simon handed him the "confession." If he signed it, she promised the first-degree murder charges would be reduced, and he could go home, Craighead recalled. Broken down, scared, and disoriented, Craighead signed the paper — a decision that would cost him seven years in prison.
- Suspects were routinely locked in small rooms for hours if they refused to talk and were denied access to attorneys and a phone call. In each of the cases, Simon had no arrest warrants to legally confine the suspects and witnesses.
- Simon falsely promised suspects, some of whom were teenagers, that they could go home if they signed confessions that she wrote.
- Simon illegally presented herself as a prosecutor who had authorization to file charges and falsely promised leniency if suspects signed statements admitting guilt.

- In one case, Simon called a suspect a racial slur and told him any jury in America would convict him of killing a white woman.
- She threatened to frame witnesses for murder or other crimes if they didn't incriminate suspects who turned out to be innocent. Those witnesses later recanted.
- Their stories are strikingly similar to those who were exonerated. For up to eight hours, they were forced to undergo aggressive interrogations or were placed in a locked room without a warrant, food, or phone calls. They were falsely — and illegally — promised freedom if they confessed. And they were told there was undeniable evidence that would lead to their convictions, a claim they would later find out was untrue.
- Both interrogations "turned to physical abuse," and Simon and another cop choked one of the alleged witnesses, according to court records. One of the interrogations lasted six hours, and Simon allegedly threatened to frame two suspects or they'd be implicated in the murder, according to court records. She wrote up the statements and told them to sign the papers.
- During an interrogation, Simon called Johnson a racial slur and told him any jury in America would convict him of killing a white woman, according to Johnson. Simon added that she was under pressure from then-Mayor Dennis Archer to close the case and didn't care if he was innocent, according to one of Johnson's affidavits. He said Simon didn't investigate his alibis and she responded that "it didn't matter because the mayor was her boss and her boss was on them and they were going to charge me with the murder whether I was innocent or not." Johnson, who had a baby on the way, said he "begged" Simon "not to do this to me." "Ms. Simon then asked me how far I had gone in school," Johnson recalled. "I told her I had gone through 10th grade. She then called me a 'stupid [n-word]' and repeated that I needed to confess to this crime that I did not do."
- Simon claimed she had plenty of evidence against him to get a jury to convict him, threatened to take away his son, and promised to set him free if he confessed, he says. "She presented herself as a prosecutor," Peterson says. "She said she was willing to help me if I helped myself. She said if I agree to sign a statement, I could go home and face lesser charges. She had already convinced me that she had already arrested me and charged me with murder." During an interrogation, police are barred from making promises about charges since those decisions fall under the prosecutor's authority. "I was ready to get out of there, and I was willing to do anything," he recalls. Peterson says Simon wrote the statement and told him to sign it. According to the statement, Peterson wrestled the victim with a gun and shot him in the back twice. Peterson was charged with murder and immediately incarcerated.

51. The Detroit Metro Times Article goes on to describe the release of certain defendants from incarceration and their subsequent recovery of millions of dollars in damages arising from their civil claims against the City of Detroit and Ms. Simon, for the abuse they

sustained arising out of the illegal, coerced, and wrongful confessions, convictions, and incarcerations.

52. Immediately after describing this egregious misconduct and the resulting massive civil penalties, the author then begins a new subheading entitled, “The Reid technique,” in which he extensively relies upon and repeats what he had been told by Trainum, who is prominently mentioned in the article and whom he describes as a “former longtime homicide detective in Washington, D.C. and an expert and consultant on interrogations and confessions.”

53. In the “Reid technique” section, the author writes that “[Trainum] says Simon uses a controversial method of interrogation known to create false confessions. Called the ‘Reid Technique,’ the method is aimed at increasing suspects’ anxiety by creating a high-pressure environment, such as confining them to a room for hours and saying they are going to spend the rest of their lives in prison.”

54. Trainum’s statements are false, which he knew at the time he made them. Ms. Simon was not using the Reid Technique. The methods undertaken by Ms. Simon are not part of the Reid Technique. The Reid Technique does not provide for the physical abuse of suspects, confining them in small rooms, telling them they will spend life in prison, falsely promising leniency, or denying them any of their rights.

55. The author further quotes Trainum and repeats his statements about the Reid Technique: “‘The suspects are presented with a situation where they feel like they are going to get screwed,’ Trainum tells the *Metro Times*. ‘They are being guaranteed that they are going to be convicted by an authority figure. Then they start talking about leniency and say the judge will like it much better if they confess. They’ll say, ‘If you take responsibility, they are going to go much lighter on you.’ It’s a forced choice.’.”

56. None of this is true. The Reid Technique does not involve or condone promises of leniency, threatening suspects with physical harm or inevitable consequences, denial of rights, denial of physical needs, etc. Trainum knew this as demonstrated by the Reid Investigator Tips that he had read and learned by attending the Reid training program.

57. Immediately after these quotes, the author relies on what he had been told by Trainum and states that the Reid Technique has been banned in several European countries, describes the Reid Technique as a “manipulative” tool to “extract a confession,” and again quotes Trainum in stating that, “[t]o reduce false confessions, Trainum says the U.S. needs to abolish the Reid Technique.”

58. The Reid Technique has not been banned “in several European countries.” Rather, several countries prohibit investigators from misrepresenting case evidence to suspects.

59. Trainum communicated with the author shortly before the publication of the Detroit Metro Times Article, made statements of alleged fact about the Reid Technique in words that are repeated or substantially similar to those used in the Article, and did so with the expectation that the statements would be published and circulated. Trainum’s statements falsely charge that the incidents of misconduct by Barbara Simon and others described in the article are part of the Reid Technique. The wrongful conduct described in the Detroit Metro Times Article is not part of the Reid Technique and is expressly not condoned by Reid in its textbooks, training materials, seminars, and other materials, and Trainum knew this.

60. On January 17, 2024, the Cascade Article was published. The article describes the infamous case of Amanda Knox, who was wrongly convicted of murdering her roommate while studying abroad in Italy, and was subjected to a 53-hour interrogation by officers who ultimately coerced her to make false statements that were the basis of her conviction.

61. The article describes improper police conduct, including but not limited to the following excerpt:

Knox described her 53-hour, five-day interrogation in Italy where officers claimed to have evidence incriminating her in the murder of her roommate, Meredith Kercher. Knox, at the time a University of Washington student studying abroad, says police deception led her to make false statements and was the crux of her murder conviction, which was later reversed on appeal.

62. The author then relies on what she had been told by Trainum shortly before the publication of the article, and states “that virtually every law enforcement agency uses the Reid Technique,” in which “Officers may urge suspects to confess by making unauthorized promises of leniency for doing so, such as a lighter sentence.” Trainum knew this was not true.

63. Trainum’s statements to the author were repeated or were substantially similar to those stated in the article. Trainum’s statements, however, are false. The Reid Technique does not include, nor does Reid condone, offering a subject promises of leniency for confessing.

64. Trainum’s implication that the officers who questioned Amanda Knox for a 53-hour period were utilizing the Reid Technique is also false, as excessively long interrogations is not part of the Reid Technique and is not a permissible practice when utilizing the Reid Technique.

65. Trainum’s statements that are reflected in the Detroit Metro Times Article and the Cascade Article attempt to assign blame for what occurred in the cases described in those articles. Besides the police officers and prosecutors, Trainum also blames Reid for being the proponent of coercive tactics that were used by those officers and prosecutors in eliciting coerced and wrongful confessions. In the articles, Trainum falsely published statements contending that obtaining coerced confessions, confining them without justification, making false promises of leniency, long hours of questioning without food, etc., is synonymous with the Reid Technique.

66. Trainum knew that the abusive interrogation measures used against the suspects outlined in the Detroit Metro Times Article and against Amanda Knox outlined in the Cascade Article were not condoned by Reid nor permitted by the Reid Technique.

67. None of the articles, books, seminars, links, or any other document or information accessed by Trainum or readily available to Trainum identified the Reid Technique as condoning excessively long interrogations, coercive conduct, promises of leniency, striking or assaulting subjects, depriving them of their rights, depriving them of physical needs, etc.

68. At the very least, Trainum recklessly disregarded the truth of the false statements he made to the reporters in the Detroit Metro Times Article and Cascade Article regarding Reid and the Reid Technique. Even the most basic search would have revealed that the Reid Technique does not condone and prohibits excessively long interrogations, coercive conduct, striking or assaulting subjects, depriving them of their rights or physical needs, making promises of leniency or making threats of harm or inevitable consequences.

69. Trainum knew that the statements he made to the reporters that were published in the Detroit Metro Times Article and Cascade Article were false.

70. Despite this knowledge, Trainum made the false statements anyway, stating that Barbara Simon used the Reid Technique and equating the Reid Technique with the egregious and improper conduct described in the articles, including locking suspects in rooms for hours, making promises of leniency, physically attacking suspects, denying them their rights, etc.

71. Trainum intended for his statements to assign blame to Reid for the abusive interrogations, coerced confessions, wrongful convictions, and imprisonments of the defendants described in the Detroit Metro Times Article and the Cascade Article.

72. In specifically identifying Reid and the Reid Technique by name, Trainum willfully and intentionally targeted Reid, inflicting commercial and reputational harm on Reid.

73. The Detroit Metro Times Article and Cascade Article are readily available to be viewed worldwide, including on the internet. The articles have been viewed by members of law enforcement, private security, and educational institutions, among others. Reid's customers and target audience include the same groups.

74. Reid has been substantially harmed by Trainum's defamatory statements as to Reid's business, profession, and products.

75. Reid has already fielded questions and negative feedback regarding the criticism of the Reid Technique and false comments about the Reid Technique in the Detroit Metro Times Article and Cascade Article.

76. Reid's programming at its seminars and trainings have been altered because of misrepresentations regarding the Reid Technique.

77. Reid has also expended substantial time and resources to create marketing materials, such as articles and blog posts, which rebut the false statements and conclusions made about the Reid Technique, including those false comments made by Trainum.

78. On April 9, 2024, Reid published an article on its website entitled "Responding to a False Confession Expert in Your Case," addressing the misrepresentations made by purported "experts" regarding the Reid Technique, such as the comments published by Trainum.

79. The false statements by Trainum have impaired Reid's reputation and standing in the business community and have discouraged customers and clients from utilizing Reid or purchasing Reid's training packages. The defamatory statements have caused Reid a loss of revenue and profits.

80. On October 15 and 30, 2024, counsel for Reid sent correspondence to Trainum, informing him that he had defamed and disparaged Reid by his statements to the reporters published in the Detroit Metro Times Article and Cascade Article, and alerting him to the falsity or reckless disregard for the truth as to his statements about Reid and the Reid Technique. The letter requested that Trainum cease and desist from making further false disparaging statements about the Reid Technique, and issue an unequivocal written retraction of all of the false and defamatory statements he has made regarding the Reid Technique.

81. Trainum responded to the letter but did not agree to make an unequivocal retraction of his false statements regarding the Reid Technique.

82. The Detroit Metro Times Article and Cascade Article remain available and readily accessible worldwide.

83. Reid has sustained damages and will continue to sustain damages so long as the Detroit Metro Times Article and Cascade Article and the defamatory and disparaging statements therein remain available.

COUNT I
(Defamation *Per Se*)

84. Reid hereby reasserts and re-alleges paragraphs 1 through 83 as though fully set forth herein.

85. Trainum has made false, defamatory statements of fact about Reid that were published in the Detroit Metro Times Article and Cascade Article, including statements that the Reid Technique includes, and that Reid condones, improper interrogation tactics including, but not limited to, locking suspects in small rooms for hours, denying suspects access to attorneys and a phone call, confining suspects without arrest warrants or legal justification, physically abusing and choking suspects, threatening witnesses that false crimes will be pursued against them if they did

not incriminate suspects, promising to set suspects free if they confessed to crimes, promising that a suspect would be subject to lesser charges if they signed false confessions, excessively long interrogations, drafting false confessions without input from the suspect and demanding they sign them, etc.

86. The conduct Trainum refers and alludes to in his statements is not the Reid Technique. None of the aforementioned conduct is condoned by Reid nor permissible when using the Reid Technique.

87. Trainum knew when he made the statements that they were false, or exercised a reckless disregard for their truth.

88. Trainum's statements are defamatory, as they cause harm to the reputation of Reid, lower Reid in the eyes of the community, and deter customers and clients from associating with Reid.

89. Trainum made an unprivileged publication of the false, defamatory statements when he made those statements to reporters with knowledge that those statements would be published in news articles that would be available to the public.

90. Trainum's false, defamatory statements are defamatory *per se* because they imply that the Reid Technique involves the commission of criminal acts in order to coerce confessions, and also impute a want of integrity in Reid's business, particularly its use of the Reid Technique, and also prejudice Reid and impute a lack of ability in its trade, profession, or business.

91. Trainum has acted with actual malice in publishing the false, defamatory statements.

92. Trainum's conduct proximately caused Reid actual damages.

93. Punitive damages are warranted in an amount sufficient to punish Trainum and to deter him and others from such wrongful conduct.

WHEREFORE, Reid prays for judgment against Trainum and an award of:

- (1) Actual and presumed damages in an amount to be determined at trial, but exceeding \$10,000;
- (2) Punitive damages;
- (3) For such other and further relief as the Court deems just and equitable.

COUNT II
(Defamation *Per Quod*)

94. Reid hereby reasserts and re-alleges paragraphs 1 through 83 as though fully set forth herein.

95. Trainum has made false, defamatory statements of fact about Reid that were published in the Detroit Metro Times Article and Cascade Article, including statements that the Reid Technique includes, and that Reid condones, improper interrogation tactics including, but not limited to, locking suspects in small rooms for hours, denying suspects access to attorneys and a phone call, confining suspects without arrest warrants or legal justification, physically abusing and choking suspects, threatening witnesses that false crimes will be pursued against them if they did not incriminate suspects, promising to set suspects free if they confessed to crimes, promising that a suspect would be subject to lesser charges if they signed false confessions, excessively long interrogations, drafting false confessions without input from the suspect and demanding they sign them, etc.

96. The conduct Trainum refers and alludes to in his statements is not the Reid Technique. None of the aforementioned conduct is condoned by Reid nor permissible when using the Reid Technique.

97. Trainum knew when he made the statements that they were false, or exercised a reckless disregard for their truth.

98. Trainum's statements are defamatory, as they cause harm to the reputation of Reid, lower Reid in the eyes of the community, and deter customers and clients from associating with Reid.

99. Trainum made an unprivileged publication of the false, defamatory statements when he made those statements to reporters with knowledge that those statements would be published in news articles that would be available to the public.

100. Reid has suffered substantial damages as a result of Trainum's defamatory conduct.

101. At its seminars and programs, Reid has already fielded questions and negative feedback regarding the criticism of the Reid Technique and false comments about the Reid Technique in the Detroit Metro Times Article and Cascade Article.

102. Reid has also expended substantial time and resources to create marketing materials, such as articles and blog posts, which rebut the false statements and conclusions made about the Reid Technique.

103. Reid's programming at its seminars and trainings has been altered because of misrepresentations made regarding the Reid Technique.

104. The false statements by Trainum have impaired Reid's reputation and standing in the business community and have discouraged customers and clients from utilizing Reid or purchasing Reid's training packages. The defamatory statements have caused Reid a loss of revenue and profits.

105. Trainum has acted with actual malice in publishing the false, defamatory statements.

106. Trainum's conduct proximately caused Reid actual damages.

107. Punitive damages are warranted in an amount sufficient to punish him and to deter him and others from such wrongful conduct.

WHEREFORE, Reid prays for judgment against Trainum and an award of:

- (1) Actual damages in an amount to be determined at trial, but exceeding \$10,000;
- (2) Punitive damages;
- (3) For such other and further relief as the Court deems just and equitable.

COUNT III
(Injurious Falsehood / Commercial Disparagement)

108. Reid hereby reasserts and re-alleges paragraphs 1 through 83 as though fully set forth herein.

109. Trainum made false and unprivileged statements that disparage and demean the quality of the Reid Technique, a product and service that Reid markets, sells, and teaches to its customers.

110. Reid has been and continues to be harmed by Trainum's disparagement of the Reid Technique, which conduct has proximately caused Reid actual damages.

111. At its seminars and programs, Reid has already fielded questions and negative feedback regarding the criticism of the Reid Technique and false and disparaging comments about the Reid Technique in the Detroit Metro Times Article and Cascade Article.

112. Reid has also expended substantial time and resources to create marketing materials, such as articles and blog posts, which rebut the false statements and conclusions made about the Reid Technique.

113. Reid's programming at its seminars and trainings has been altered because of misrepresentations made regarding the Reid Technique.

114. The false and disparaging statements by Trainum have impaired Reid's reputation and standing in the business community and have discouraged customers and clients from utilizing Reid or purchasing Reid's training packages. The disparaging statements have caused Reid a loss of revenue and profits.

115. Trainum has acted with actual malice in publishing the false, disparaging statements.

116. Punitive damages are warranted in an amount sufficient to punish him and to deter him and others from such wrongful conduct.

WHEREFORE, Reid prays for judgment against Trainum and an award of:

- (1) Actual damages in an amount to be determined at trial, but exceeding \$10,000;
- (2) Punitive damages; and
- (3) For such other and further relief as the Court deems just and equitable.

JURY DEMAND

Plaintiff, by and through undersigned counsel, respectfully requests a trial by jury of all facts and issues in this matter.

Dated: December 18, 2024

Respectfully submitted,

COZEN O'CONNOR

/s/ Deanna H. Clayton

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EXHIBIT A



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A Detroit detective terrorized young men into making false confessions. Some are still behind bars.

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The Closer: Part I

By [Steve Neavling](#)

Jul 24, 2024 at 6:00 am





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Mark Craighead and Lamarr Monson were exonerated after it was found that Detective Barbara Simon used deceptive and coercive interrogation techniques on them.

Steve Neavling

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Part I of a series about wrongful convictions in Detroit. Part II: “Activists call for a review of all cases tied to a Detroit detective who terrorized young men to get false confessions.”



The day Mark Craighead lost his freedom for a murder he couldn't have committed, he just wanted to come home and get some rest. He was tired and hungry.

But when he arrived at his home in Detroit on that warm, sunny evening in June 2000, two detectives were waiting on his porch and demanded he come downtown for questioning about his friend's murder three years earlier.

Chole Pruett, 26, was found fatally shot inside his apartment in Detroit. His 1996 Chevy Tahoe was set ablaze behind an elementary school in Redford Township.

Craighead had to work at 5 a.m. the following day at a Chrysler plant. But the detectives, despite not having an arrest warrant, insisted he had no choice.

Craighead, who had no criminal record and coached youth football, had already been interviewed twice by Detroit police, and each time they were satisfied with his answers. But this time was different.

Waiting at police headquarters downtown was Detective Barbara Simon, an aggressive interrogator who spent years waging psychological warfare on young Black men accused of murder. In the 1990s and early 2000s, she engaged in investigative misconduct, illegally held suspects without a warrant, denied them access to an attorney or phone call, threatened them, and made false promises

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of leniency, judges and prosecutors would later determine. Suspects who refused to talk without an attorney were confined to jail cells infested with cockroaches, rats, and other vermin.

Her tactics led to false confessions and fabricated witness statements.

As Craighead rode in the rear of a squad car wearing shorts and a tank top, he had no idea what he was up against. He wasn't allowed to call an attorney or make a phone call, according to affidavits and a subsequent lawsuit.

When they arrived at police headquarters at 1300 Beaubien, Craighead says he was confined for hours to a four-foot by four-foot locked room with a desk and steel grates on the window.

He was left alone with a growing migraine headache and nothing to eat or drink. When he pounded on the door and demanded to be let out, Simon told him to "sit down and shut up," Craighead says.

Without a lawyer present, Craighead had no plans to answer questions.

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But Simon, who was known as "the closer" for obtaining confessions, had another plan that worked with countless other suspects: Frighten him and wear him down.

When Craighead sat face to face with Simon, he repeatedly refused to answer questions. Simon claimed she had evidence linking him to the murder. Police took him to different rooms and left him alone for hours.

After 1 a.m., more than seven hours after he was taken into custody without a warrant, a lawyer, or a phone call, Simon told Craighead he would be released and still make it to work for his 5 a.m. shift if he agreed to take a polygraph. If he didn't, he would remain in custody, Simon told him, according to court records.

Knowing the fallibility of polygraphs, Craighead took a risk and agreed. He just wanted to go home. Simon escorted him to another building, where he was strapped into a polygraph machine.

"She gave me no choice," Craighead said, according to the affidavit. "I would lose my job."

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After about an hour of questions, Simon told Craighead he failed the polygraph, a conclusion that was later contradicted by another test. Falsely claiming the polygraph was admissible in court, Simon leaned in and said, "Your wife is going

to find a new husband and your kids are going to call somebody else daddy if you don't tell me what you did because you're going to jail for the rest of your life without parole," Craighead recalled in a deposition.

After he refused to confess to a murder that evidence would later show he didn't commit, Simon placed Craighead in handcuffs and fingerprinted him. When asked if he could go home as promised, Craighead says Simon laughed at him.

After 4 a.m., Craighead was placed in a cold jail cell with no blanket or pillow. The only place to sit was a wooden bench with screws poking out. Mice and cockroaches scurried about, he says.

At least he had a chance to use a restroom for the first time since he arrived more than eight hours earlier.

"I was kind of scared and terrified," Craighead recalled in a deposition.

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At 11 a.m., a detective escorted Craighead back to the tiny interrogation room where he had sat for hours alone the night before. The officer rebuffed Craighead's request for an attorney, phone call, and medicine for his migraine, he says.



Simon walked in and also denied his requests, according to Craighead.

"We got you," Craighead recalled Simon telling him. "We know that you shot Chole, and we can prove it."

As Craighead would later find out, the police had no evidence linking him to the murder.

To Craighead's surprise, Simon presented him with a detailed narrative about what went down on the night of Pruett's murder in July 1997: He and Craighead got into a fight. Pruett pulled out a gun, and the pair struggled for control of it. The gun went off. Pruett died.

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The alleged confession, which Simon handwrote, was contradicted by forensic evidence, which showed Pruett was shot four times in the back execution-style from a distance of at least two feet.

In her interview with Craighead, Simon insisted the shooting was an "accident" and said, "You don't seem like the kind of person that would kill or rob your best friend, so you must have had a reason," according to court records.

Simon handed him the "confession." If he signed it, she promised the first-degree murder charges would be reduced, and he could go home, Craighead recalled.

Broken down, scared, and disoriented, Craighead signed the paper — a decision that would cost him seven years in prison.

"I signed it to avoid going to prison for the rest of my life," Craighead said during a deposition.

He had two children, ages 2 and 4.

Although Craighead and his attorney argued the confession was fabricated and coerced and that his rights were violated, a judge allowed prosecutors to use the written statement as the primary evidence against him, and he was convicted of manslaughter in 2002.

As the jury read the verdict, Craighead broke down in tears.

"I was crying," he recalls. "I got hoodwinked. I hadn't seen the light of day since they arrested me on my porch. It was traumatic."

He wouldn't be a free man until 2009, and it would take another 12 years until he was exonerated.



Steve Neavling

Suspects and witnesses were rounded up and interrogated at the then-headquarters of the Detroit Police Department at 1300 Beaubien in downtown. The building was used by DPD until 2013.

Locked up and lied to

Craighead is among four Black men who have been exonerated of murder convictions after their attorneys showed that Simon, who is also Black, used deceptive and coercive interrogation techniques. A fifth Black man, who falsely confessed after being unlawfully imprisoned, was freed before his murder trial because DNA evidence showed he wasn't the killer.

All five sued Simon and the city, and three of them have been settled so far at a cost to taxpayers of more than \$16 million.

The two other lawsuits, including one by Craighead, are still wending their way through federal court and likely will cost the city millions more. Because the city is self-insured, Detroit must cover the costs of settlements and attorneys, diverting crucial resources away from essential public services.

Simon worked in the Homicide Division for about 20 years before she retired in 2010. Shortly after, then-Attorney General Mike Cox hired Simon as an investigator. She retired in August 2021.

A six-month *Metro Times* investigation, which included a review of thousands of pages of court documents and dozens of interviews with exonerees, inmates, defense attorneys, interrogation experts, private investigators, and law enforcement officials, paints a troubling picture of Simon and the prosecutors, police leaders, and judges who could have stopped her. Simon used aggressive, illegal, and sometimes violent interrogation techniques on suspects and witnesses, according to affidavits, court transcripts, and multiple lawsuits.

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Here's what we found, according to those documents:

- Suspects were routinely locked in small rooms for hours if they refused to talk and were denied access to attorneys and a phone call. In each of the cases, Simon had no arrest warrants to legally confine the suspects and witnesses.
- Simon falsely promised suspects, some of whom were teenagers, that they could go home if they signed confessions that she wrote.
- Simon illegally presented herself as a prosecutor who had authorization to file charges and falsely promised leniency if suspects signed statements admitting guilt.
- In one case, Simon called a suspect a racial slur and told him any jury in America would convict him of killing a white woman.

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- While testifying at trial and during depositions, Simon often claimed she couldn't recall basic information about the interrogations.
- She threatened to frame witnesses for murder or other crimes if they didn't incriminate suspects who turned out to be innocent. Those witnesses later recanted.

Although the exonerations have shown that Simon resorted to psychological torment to elicit false confessions and fabricated witness statements, countless other suspects who were interrogated by the detective are still behind bars. During her career, Simon said she interrogated "hundreds" of suspects.

Metro Times tracked down eight other inmates who emphatically claim they were falsely convicted because of Simon's interrogation tactics. Many of them were teenagers when they were convicted.

Attorneys and private investigators who have worked on the Simon cases believe many more innocent people are behind bars because of the detective's interrogation tactics.

"There certainly are still innocent people in prison because of Simon," David Moran, co-founder and a lead counsel at the Michigan Innocence Clinic, tells *Metro Times*. "There are likely a bunch."

No accountability or justice

Despite what defense attorneys say was a clear and alarming pattern of Simon resorting to abusive, illegal, and deceptive tactics to get guilty verdicts, the exonerees and those still in prison have faced stiff resistance from judges and the Wayne County Prosecutor's Office. Time and time again, judges turned down appeals, and prosecutors fought to keep the men in prison, despite later admitting some of the defendants were innocent.

"The prosecutors will file an appeal, and they drag it through the appellate court for two to four years," Steve Crane, a private investigator who helped get three innocent prisoners released, tells *Metro Times*. "They don't want to accept a loss at any cost. It's disgusting, and it's frustrating."

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Those still in prison say they're withering away behind bars because judges and prosecutors won't consider their cases.

Their stories are strikingly similar to those who were exonerated. For up to eight hours, they were forced to undergo aggressive interrogations or were placed in a locked room without a warrant, food, or phone calls. They were falsely – and illegally – promised freedom if they confessed. And they were told there was undeniable evidence that would lead to their convictions, a claim they would later find out was untrue.

In each of the cases, Simon was one of the lead investigators. And she wasn't just any detective. When Detroit police had trouble getting witnesses or suspects to talk, they often depended on Simon, who had an unusual – and many would say suspicious – record of obtaining confessions, albeit ones that had been repeatedly recanted or contradicted.

Defense attorneys have repeatedly said Simon had a history of ignoring or withholding evidence that suggested a suspect was innocent. She also falsely testified during murder trials. In one case, Simon testified that the defendant fatally stabbed the victim, which lined up with what turned out to be a coerced, false confession. The autopsy revealed the victim was beaten to death.

The stories behind the convictions are symptomatic of a dark, troubling, and often lawless time for Detroit's homicide division. During a multiple-year investigation by the U.S. Department of Justice that began in December 2000, federal investigators found that homicide detectives trampled on the constitutional rights of suspects and witnesses for decades to get confessions. According to the DOJ, the department had a history of subjecting suspects and witnesses to false arrests, illegal detentions, and abusive interrogations. Despite what was at stake, the detectives weren't properly trained, and bad cops were rarely disciplined, the DOJ concluded.

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In 2003, to avoid a massive civil rights lawsuit claiming suspects and witnesses endured false arrests, unlawful detentions, fabricated confessions, excessive force, and unconstitutional conditions of confinement, the Detroit Police Department agreed to DOJ oversight in 2003. Because of the harsh interrogation tactics, DPD agreed in 2006 to videotape interrogations of all suspects in crimes that carry a maximum penalty of life in prison.

After 13 years of federal government scrutiny, the DOJ finally ended its oversight, but only after DPD agreed to sweeping changes in a consent decree to overhaul its arrest, interrogation, and detention policies. Detectives could no longer round up witnesses and force them to answer questions at police precincts and headquarters.

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By then, the damage done during that time is impossible to measure. But what's clear is that lives were destroyed, and many more innocent people are likely behind bars for crimes they didn't commit, attorneys and private investigators say.

At no point since then have prosecutors or police tried to reexamine the cases during this troubling time.

"The Detroit Homicide Division was a trainwreck. It was completely out of control in the 1990s and early 2000s," Moran says. "You have a police department that for a decade or more was rogue. There's no other way to describe it. It's undeniable."

In 1997, three years before the DOJ's investigation, the head of DPD's Homicide Division, Joan Ghougoian, was accused of illegally obtaining murder confessions by falsely promising suspects they could go home. Monica Childs, a homicide detective at the time, blew the whistle on Ghougoian and was reassigned to another department. Childs alleged in a lawsuit against the department that Ghougoian attacked, cursed, bullied, and ignored her when she tried to prevent illegally obtained murder confessions from being used.

At the time, Simon was working in the Homicide Division.

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Although she is by no means the only Detroit homicide detective to be accused of eliciting false confessions and witness statements during that time, the volume of allegations and the resulting exonerations make Simon stand out in a department plagued by accusations of misconduct.

Despite the attention the whistleblower lawsuit and DOJ investigation brought to the police department, Simon continued to illegally obtain confessions, according to lawsuits, affidavits, and depositions.

'A stupid [n-word]'

On Mother's Day in 1999, Lisa Kindred was getting inside her family van with her three children when a lone gunman rushed up and shot her in the chest on Bewick Street on the city's east side. To save her children, the 35-year-old Roseville woman drove away and pulled into a gas station to ask for help. She fell out of the car and was later pronounced dead at a hospital. Her children huddled in the back seat, screaming and crying.

The children, ages 10 days to 8 years old, were uninjured.

Within hours, police rounded up two alleged witnesses, both of whom were heavily intoxicated on drugs and alcohol, according to a lawsuit that was later filed. One was a 16-year-old who was illiterate and dropped out of high school. The other had mental health issues and heard voices.

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Both interrogations "turned to physical abuse," and Simon and another cop choked one of the alleged witnesses, according to court records. One of the interrogations lasted six hours, and Simon allegedly threatened to frame two suspects or they'd be implicated in the murder, according to court records. She wrote up the statements and told them to sign the papers.

Afraid they'd be charged, the pair signed the statements, leading to the arrests of Justly Johnson, 24, and Kendrick Scott, 20, on the day of the shooting.

During an interrogation, Simon called Johnson a racial slur and told him any jury in America would convict him of killing a white woman, according to Johnson. Simon added that she was under pressure from then-Mayor Dennis Archer to close the case and didn't care if he was innocent, according to one of Johnson's affidavits.

He said Simon didn't investigate his alibis and she responded that "it didn't matter because the mayor was her boss and her boss was on them and they were going to charge me with the murder whether I was innocent or not."

Johnson, who had a baby on the way, said he "begged" Simon "not to do this to me."

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"Ms. Simon then asked me how far I had gone in school," Johnson recalled. "I told her I had gone through 10th grade. She then called me a 'stupid [n-word]' and repeated that I needed to confess to this crime that I did not do."

Simon repeated the slur and that a jury was going to convict a Black man of killing a white woman, even if he didn't commit the crime.

"At that point I broke down in tears, begged investigator Simon for my life and continued to protest my innocence," Johnson said. "Investigator Simon then stormed out of the room."



In January 2000, Johnson was convicted of murder, assault with intent to commit robbery, and felony use of a firearm. He was sentenced to life in prison without the possibility of parole.

Scott was convicted of the same charges in May 2000 and was also sentenced to life without parole.



Michigan Department of Corrections

Kendrick Scott.

Johnson and Scott never gave up on getting out of prison and proving their innocence.

In 2009, Scott Lewis, an investigative reporter in Detroit, began reviewing the case. Two years later, he sent a letter to the victim's son, Charmous Skinner Jr., who at the time of the shooting was 8 years old. He was in the front seat when his mother was shot and said he'd never forget the shooter's face. He described the gunman as being in his mid-30s with a heavy beard and very large nose, neither of which matched the description of Johnson or Scott. He also said the shooter was alone.

Lewis contacted the Michigan Innocence Clinic, which had recently taken on the case. Law students and a supervising attorney from the clinic interviewed Skinner and showed him photographs of Johnson and Scott. Neither of them was the gunman, he said. Skinner said he was "a hundred percent" positive.

Even though Skinner had seen the killer, police never interviewed him.

Despite the new evidence, the clinic couldn't get a judge to look at the case.

Wayne County Circuit Judge Prentis Edwards denied a motion for relief from judgment in 2011, without even holding a hearing. In 2013, Wayne County Circuit Judge James Callahan also denied the motion without a hearing, and the Michigan Court of Appeals declined to grant the defense permission to appeal.

Finally, in 2014, the Michigan Supreme Court ordered the cases to be remanded to circuit court for a joint hearing to determine whether Scott and Johnson were entitled to a new trial.

During the hearing, one of the alleged witnesses said he had falsely implicated Johnson and Scott and that police "whooped" him during the interrogation. A cousin of the other alleged witness, who died in 2008, said her cousin admitted to her that he lied to investigators because he was afraid of being charged.

“At that point I broke down in tears, begged investigator Simon for my life and continued to protest my innocence,” Johnson said.

“Investigator Simon then stormed out of the room.”

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Defense attorneys also provided reports that showed the victim's husband, Will Kindred, had been involved in "a series of violent domestic incidents" with his wife. At one point, he even threatened to kill her whole family, according to the records. On at least two occasions, police confiscated .22-caliber weapons from the husband after two of the alleged domestic violence incidents.

The weapon used in the murder was a .22-caliber gun.

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Nevertheless, the judge denied a motion for a new trial in August 2015, concluding that Kindred was likely murdered as part of a planned contract killing that involved Scott and Johnson.

After the Michigan Court of Appeals upheld the ruling, the Michigan Supreme Court finally ordered new trials for Johnson and Scott in July 2018.

On Nov. 28, 2018, the Wayne County Prosecutor's Office dismissed the charges, and Scott and Johnson were free men for the first time in 18 years.

Johnson and Scott filed separate lawsuits in U.S. District Court against Simon and another Detroit cop, Catherine Adams, claiming they coerced two witnesses into falsely implicating them in the murder and engaged in "deliberate and knowing fabrication of evidence."



In November 2022, the city of Detroit settled the lawsuits, agreeing to pay Johnson and Scott \$8 million each.

Johnson's attorney, Wolfgang Mueller, says lawsuits and media exposure are the most effective ways to prevent police departments and prosecutors from putting innocent people in prison.

"Publicity and lawsuits help improve the system," Mueller tells *Metro Times*. "You have to hit people in the pocketbook. It's when they get hit in the pocketbook that they make changes. When this stuff comes out of the dark, then change can be made. We as a society won't tolerate it if we know about it. It's just that for so long people didn't know about it."

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Coercive tactics

In February 2000, Nathan Peterson found himself face to face with Simon, accused of fatally shooting a man. Moments earlier, he says, he was riding in the rear of a police car with a cameraman.

Like the others, Peterson, who was 23 at the time, says he was isolated in a room for hours before Simon began threatening him.

"During the interrogation, she was using this cameraman as a tool to try to threaten to expose me to the media as a murderer," he tells *Metro Times*. "She says if I didn't agree to what she said, she was going to embarrass me and portray me as a murderer. ... I was thinking of my family. I didn't want my mom to get embarrassed."

Simon claimed she had plenty of evidence against him to get a jury to convict him, threatened to take away his son, and promised to set him free if he confessed, he says.

"She presented herself as a prosecutor," Peterson says. "She said she was willing to help me if I helped myself. She said if I agree to sign a statement, I could go home and face lesser charges. She had already convinced me that she had already arrested me and charged me with murder."

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During an interrogation, police are barred from making promises about charges since those decisions fall under the prosecutor's authority.

"I was ready to get out of there, and I was willing to do anything," he recalls.

Peterson says Simon wrote the statement and told him to sign it. According to the statement, Peterson wrestled the victim with a gun and shot him in the back twice.



Peterson was charged with murder and immediately incarcerated.

His first trial ended in a hung jury in July 2001.

Peterson says police and prosecutors changed the narrative of the shooting during the second trial, and he was convicted.

"My thing with Simon, she knew I didn't do what she said I did," Peterson says.

At a hearing before the trial, Simon initially denied there was a cameraman but changed her story when Peterson's attorney said they had a witness. They tried to get a copy of the video footage but never got it.



Michigan Department of Corrections

Nathan Peterson.

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Under oath, Simon insisted she didn't use any form of persuasion to get Peterson to sign the confession. Simon also insisted she couldn't recall any details of the interrogation, a claim she repeatedly made under oath in other cases.

Peterson says he doesn't believe Simon thought he was guilty.



"Their only concern was just closing the case," he says. "That's all she was concerned about. They weren't concerned whether I was innocent or not. They virtually kidnapped me off the street and did what they wanted with me."

Peterson remains in prison and has been unable to convince courts or prosecutors to review his case.

The Reid technique

James L. Trainum, a former longtime homicide detective in Washington, D.C., and an expert and consultant on interrogations and confessions, says Simon's tactics were psychologically coercive and could easily lead to false confessions.

He says Simon uses a controversial method of interrogation known to create false confessions. Called the "Reid technique," the method is aimed at increasing suspects' anxiety by creating a high-pressure environment, such as confining them to a room for hours and saying they are going to spend the rest of their lives in prison. The interrogator then presents evidence — real or invented — to suggest that police already have proof of the suspects' guilt. The technique was developed by former Chicago cop and polygraph expert John E. Reid in the 1950s.

To elicit a confession, the interrogator provides explanations that frame the suspect's actions as justifiable or excusable, even though the interrogator knows the statement will lead to charges. A prime example is getting suspects to say they killed someone by accident.

The idea is to make the suspect believe that confessing is the easiest way out.

The problem is, experts say, the technique is inherently manipulative and can foster confirmation bias in investigators and overwhelm suspects to such a degree that they believe lying is better than telling the truth.

Years of research and numerous exonerations have demonstrated that the Reid technique can easily result in false confessions.

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"The suspects are presented with a situation where they feel like they are going to get screwed," Trainum tells *Metro Times*. "They are being guaranteed that they are going to be convicted by an authority figure. Then they start talking about leniency and say the judge will like it much better if they confess. They'll say, 'If you take responsibility, they are going to go much lighter on you.' It's a forced choice."

Trainum adds, "What the interrogation process is doing is limiting your options. They are able to lie to you about the evidence. All of that puts you in a vice."

The method has been banned in several European countries. In Canada, Provincial Court Judge Mike Dinkel ruled in 2012 that "stripped of its bare essentials, the Reid technique is a guilt-presumptive, confrontational,



psychologically manipulative procedure whose purpose is to extract a confession."

One of the largest police consulting firms in the U.S., Wicklander-Zulawski & Associates, announced in 2017 that it stopped training detectives in the Reid technique, which it had taught since 1984. The technique was being misused and prompting false confessions, the firm said.

"Confrontation is not an effective way of getting truthful information," Wicklander-Zulawski & Associates President and CEO Shane Sturman said at the time. "Rather than primarily seeking a confession, it's an important goal for investigators to find the truth ethically through a respectful, non-confrontational approach."

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In 2021, Illinois and Oregon barred police from lying to minors. The U.S. House is considering a bill that would render statements made during interrogations inadmissible if a court determines the officer deliberately used deceptive tactics, such as fabricating evidence or making unauthorized promises of leniency.

To reduce false confessions, Trainum says the U.S. needs to abolish the Reid technique.



Of the more than 3,550 exonerations nationwide, about 13% involved false confessions, according to the National Registry of Exonerations. The most famous case is known as the Central Park Five. It involved five Black and Latino teenagers wrongfully convicted of raping a jogger in New York City's Central Park in 1989, only to be exonerated in 2002 after another individual confessed and DNA evidence confirmed his guilt.

More than half of those exonerated are Black. In fact, innocent Black people are seven times more likely to be wrongfully convicted of murder than innocent white people, a reflection of the persistent biases in the criminal justice system, according to a 2022 report from the registry.

To juries, confessions are highly incriminating and they alone can lead to convictions, Trainum and other experts say.

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"A false confession trumps all other evidence, and it still does in a lot of cases because people say, 'I wouldn't have confessed, so I don't see why they would have,'" Trainum says. "Even today when it comes to exonerations, you can have DNA evidence and people will still fight it and say they confessed."

Trainum believes false confessions are more common than statistics suggest because they "are the hardest cases to get exonerated."

Another problem, he says, is that police departments in the U.S. don't tend to invest enough in training detectives to interrogate suspects, leaving the accused in unqualified hands.

In a deposition in Craighead's lawsuit in January 2023, Simon said she went to "several classes" to learn how to take witness statements and remembered "maybe once going to an outside seminar" on interrogations. She admitted she never received training by the Michigan State Police or the FBI, two agencies that typically provide courses on interrogations.

She also said she couldn't remember ever talking with prosecutors about the constitutional rights of suspects.

Nevertheless, she estimated she conducted "hundreds" of interrogations during her roughly 20 years in the Homicide Division.

Lawsuits filed against Simon also pointed out that she failed to ensure the confessions were factual. Had she bothered to verify the statements from the exonerees and others, some of the confessions would have been thrown out and could have prevented innocent people from going to prison, according to the lawsuits.

The confessions also omitted basic information that would verify whether the suspect was truthful about committing a crime. While questioning Craighead, for example, Simon didn't bother to ask basic questions, like what kind of gun he used, when he arrived at the murder scene, and which part of the victim's body he shot.

Since it turned out that Craighead wasn't the shooter, he wouldn't have been able to answer the questions truthfully.

When asked by Craighead's attorney Mueller whether she "thought it'd be important" to ask him about the type of gun he used, Simon called the question "stupid."

Undeterred, Mueller asked, "Does it sound reasonable to you, that a detective investigating a homicide, and there's a gun, would want to know what kind of gun?"

"Yes. Yes," Simon responded.

Michigan has safeguards in place that are intended to protect defendants who were coerced into giving false confessions. In what is called a "Walker hearing," judges are responsible for determining the voluntariness and admissibility of a defendant's confession before the trial. It is a crucial safeguard meant to ensure that any confession used in court was made without coercion, undue influence, or violation of the defendant's rights.

However, judges have been reluctant to throw out confessions, even when there is compelling evidence that the confessions were not voluntary. That's because judges are quick to side with prosecutors and police, even when detectives like

Simon have demonstrated a pattern of eliciting false confessions and violating defendants' constitutional rights, legal experts and defense attorneys say.

'It's akin to slavery'

In 1996, a year before Craighead's friend was murdered, Lamarr Monson was accused of fatally stabbing a runaway 12-year-old girl at a drug house on Detroit's west side. Like Craighead, Monson had no criminal record, was interrogated for hours by Simon, and was denied access to a phone and a lawyer, according to court records.

Monson, who was 24 at the time, was convicted of murder and sentenced to 30 to 50 years in prison based on a false confession that was later contradicted by evidence that should have been presented at his trial.

Monson had a 6-year-old daughter at the time. She would be an adult by the time he was exonerated.

"When you are innocent of a crime and put in prison, it's the same emotional feeling of being kidnapped and taken from your family," Monson tells *Metro Times*. "It's akin to slavery."

After more than 20 years behind bars, Monson was finally exonerated in August 2017, in large part because Wayne County prosecutors believed the "confession" was coerced. Simon was also accused of providing prosecutors with false information about crucial physical evidence and withholding inculpatory evidence.

At the trial, Simon testified that the girl, Christina Brown, died from multiple stab wounds, a claim that fit the narrative in the false confession but contradicted the autopsy that found the victim died of blunt force trauma to the skull and brain. Simon later said her false testimony was an "honest mistake."

"For her to sit there and create false narratives to convict someone of a crime, you have to be a wicked person," Monson says. "She was destroying lives. She was sabotaging justice and has willingly done this regularly."

Monson still vividly recalls the afternoon of Jan. 20, 1996, the day he walked into an abandoned apartment where he had sold drugs and found Brown sprawled out on the bathroom floor, lying in a pool of blood and gasping for breath. Her head was swollen.

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"She raised her hands and tried to say my name," Monson recalls. "I told her I was going to get help. I was banging on doors, trying to call 911. I went to my sister's house [two blocks away] and told the operator there was a girl in need of medical attention."

Monson says he sprinted back to the bathroom, covered Brown in a blanket, and propped her up so she wouldn't choke on her blood. He also began chest compressions.

Brown was later pronounced dead at a nearby hospital.

Two other people at the apartment did nothing to help, Monson says.

Police ordered Monson and the two others to get into a squad car, where they were taken to police headquarters.

Simon denied Monson his right to use a phone or contact an attorney and questioned him for more than four hours, according to court records. Simon told him he could call his parents if he signed a statement that claimed he had sex with Brown, an allegation he vehemently denies and says Simon fabricated to "dirty me up" and "make me look like a monster."

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Monson was forced to spend the night in jail and barely slept. The next morning, without having anything to eat, he was promised he could call his parents and go home if he signed a confession, according to his lawsuit.

Like in Craighead's case, Monson was told he would spend the rest of his life in prison unless he signed a statement that claimed the killing was accidental and that he got into a physical confrontation with the victim. According to the alleged confession, Monson accidentally stabbed Brown in the neck with a knife she had been holding.

Never mind that Brown actually died of blunt force trauma, presumably from being beaten with the top of a toilet tank.

Police either failed to get fingerprints from the knife and the toilet lid or they never disclosed the findings. If they had, they would have discovered that the fingerprints didn't belong to Monson and in fact belonged to Robert "Raymond" Lewis, who was also at the house and questioned by police.

In 2012, Lewis's ex-girlfriend told police that Lewis bought drugs from Brown on the morning she was killed and that he returned "covered in blood." He said he "had to kill that bitch" because she had scratched him, according to his ex-girlfriend.

Police didn't focus on Lewis at the time because he had incriminated Monson.

It would take another five years after that statement for Monson to be exonerated, in no small part because the prosecutor's office continued to insist he was guilty.

While he was in jail, Monson's family spent \$10,000 on an attorney who brought him no closer to getting him free. Without any money left, Monson taught himself how to file his own motions and appeals. He wanted to get fingerprints

from the weapons used in the murder, but each court rebuffed him.

Nearly 15 years after he was sentenced to prison, Monson had all but given up. He felt demoralized and helpless.

"God blessed this circumstance," Monson says. "I took my hands off this and said, 'I did all I can.'"

Finally, in about 2011, the Michigan Innocence Clinic agreed to take Monson's case and began the arduous task of fighting to get the weapons fingerprinted. At each step, the Wayne County Prosecutor's Office defended the handling of the case and argued Monson was guilty.

Then in September 2016, a state court ordered police to analyze the top of the toilet tank, a basic step that should have been taken 19 years earlier. The results were eye-opening: Two of the fingerprints belonged to Lewis, and none of them matched Monson's. The knife later went missing, making it impossible to analyze during the appeals process.

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It was also discovered that police failed to analyze fingerprint and blood samples from the victim's clothing, the knife, and male clothing on the floor.

With the new evidence and an affidavit from Lewis's girlfriend, a court finally granted Monson's motion for a new trial on Jan. 30, 2017.

Rather than trying to convince a jury that Monson was guilty in the face of the new evidence, the prosecutor's office dismissed the case on Aug. 25, 2017, and Monson was exonerated and finally became a free man.

In a statement at the time, the prosecutor's office indicated that Monson's confession may have been coerced.

"Due to the destruction of evidence, issues surrounding the way the police obtained Monson's confession and the passage of time, we are unable to re-try this case," Wayne County Prosecutor Kym Worthy said. "For similar reasons we are not able to charge anyone else in connection with the murder of Christina."

Worthy also admonished the police department for failing to keep evidence that could exonerate an innocent person.

"The failure of the DPD to retain critical evidence potentially threatens the very foundation of the criminal justice system and the faith placed in it by the people we protect," Worthy said, adding that she and others met with then-DPD Chief James Craig to raise the issue of the destruction of evidence in capital cases. The meeting resulted in Craig agreeing to a joint workgroup to develop an evidence retention policy.

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Despite evidence that Lewis may be the real killer, he was never charged. Two investigators for the prosecutor's office traveled to Pittsburgh to interview him, and he admitted he lived in the same apartment as the victim and bought drugs from her. But, according to the prosecutor's office, he was "in poor physical health and denied any involvement in the death of Christina Brown."

In February 2018, Monson filed a lawsuit against the city and Simon, along with several other officers. The case is still in court and headed for a trial in October.

"Now the chickens are coming home to roost," Monson says.

All these years later, Monson is still in disbelief.

"I still can't believe this happened," Monson says. "They will willingly frame an innocent person and will not accept any responsibility for doing so. It's a slap in the face."

Monson says it stings even more that a Black woman played a major role in his wrongful imprisonment.

"For a Black woman to not understand your plight as a Black man, and for her to be in a position to make things fair for you, she picked the side that abuses you and takes advantage of you, instead of seeking out the truth," Monson says. "It's incomprehensible that a Black woman would go to that extent to lock a young Black man in prison."

In a written statement, DPD declined to comment on Simon's tactics but said it "expects every member to follow the rules and regulations of the Department."

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Since the 1990s and early 2000s, DPD said it "has implemented measures including video recording of interrogations, audits and inspections to ensure members are acting in accordance with policy and that there is supervisory review."

A spokesman added, "We have high standards for every member of our Department, especially those who have sworn to protect, serve and respect the constitutional rights of all."

This story continues next week in Part II: "Activists call for a review of all cases tied to a Detroit detective who terrorized young men to get false confessions."

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Activists call for a review of all cases tied to a Detroit detective who terrorized young men to get false confessions

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EXHIBIT B

POLITICS**Amanda Knox testifies in Olympia for stricter interrogation laws**

In support of a bill that would void interview statements if a court finds deceptive police tactics, Knox described her 53-hour questioning in Italy.

by [Scarlet Hansen](#) / January 17, 2024



Amanda Knox and the Washington state capitol, where she testified on Jan. 8.

Amanda Knox, a Washingtonian who was wrongly convicted of murder in Italy, shared her firsthand experience with police deception while testifying before a Washington House committee in support of a bill that would target deceptive tactics in police interrogations.

[House Bill 1062](#), introduced in 2023, would make statements given during interrogations inadmissible if a court finds the officer intentionally used deceptive tactics such as lying about available evidence or making unauthorized statements about leniency. The bill would not apply to situations where a suspect is not in custody, such as sting operations.

In her testimony before the House Community, Safety, Justice and Reentry committee on Jan. 8, Knox described her 53-hour, five-day interrogation in Italy where officers claimed to have evidence incriminating her in the murder of her roommate, Meredith Kercher. Knox, at the time a University of Washington student studying abroad, says police deception led her to make false statements and was the crux of her murder conviction, which was later reversed on appeal.

“This issue is the greatest issue for me when it comes to resolving issues of wrongful convictions,” Knox said in her testimony. “I believe that if I had not been lied to by the police, none of this would have happened.”

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The Innocence Project, a nonprofit focused on preventing and rectifying wrongful convictions, highlights false confessions' significant role in this issue. Of the 375 DNA exonerations nationwide, [29% involved a false confession](#). This isn't surprising given that jurors believe both true and false confessions [around 88% of the time](#), according to a West Virginia University Study.

Because deceptive techniques during interrogations can push people to make false statements, supporters say this bill is needed to prevent wrongful convictions, increase trust between law enforcement and the public, and promote public safety.

“This is a matter of fairness ... too often innocent people are being arrested and convicted, and if somebody is innocent and spending time in jail, the person that is guilty is still in our community,” prime sponsor Rep. Strom Peterson, D-Edmonds, said during the hearing.

A 1969 U.S. Supreme Court case, *Frazier v. Cupp*, paved the way for routine use of police deception, as the justices ruled police can lie during interrogations. James Trainum, a former detective with the Washington, D.C., police department who currently consults on wrongful-conviction cases, told Crosscut that virtually every law enforcement agency uses the Reid technique, which utilizes police deception and was developed by [John E. Reid in the 1940s](#).

Next: [The Washington Legislature kicks off. Here's what to watch](#)

Trainum said the Reid technique involves tactics such as the false evidence ploy, in which officers coerce confessions by telling suspects they already have proof of their guilt. Officers may also urge suspects to confess by making unauthorized promises of leniency for doing so, such as a lighter sentence. Both tactics are addressed by House Bill 1062.

Trainum himself was trained to use the Reid technique. He says he started to doubt the use of deception by officers during interrogations after he got his own false confession while working as a homicide detective.

Trainum says the problem with the Reid technique is that it works too well, resulting in false confessions, unreliable information, and ultimately wrongful convictions: “[These tactics] are designed to get confirmation of what the detective believes to be true, and not information.”

Trainum calls the false evidence ploy the most problematic of the Reid tactics. Studies have shown officers lie about evidence in about [30% of custodial interrogations](#), making this tactic extremely common.

“Every single unreliable or false confession case that I’ve ever reviewed has always, always had some sort of false evidence ploy involved in it, every single one,” Trainum said.

Next: [Six measures Washington conservatives are pushing on 2024 ballots](#)

Ted Bradford, who was wrongly convicted of a Yakima sexual assault in 1996 when he was 22, illustrates the dangers of the false evidence ploy. Testifying beside Amanda Knox at the Jan. 8 hearing, Bradford told legislators how police lied to him during his nine-and-a-half-hour interrogation, telling him they had DNA evidence that would link him to the crime and that he might as well confess.

“It was just a full day ... of constant badgering, accusations, it was just a horrible experience to go through,” Bradford said in his testimony.

Bradford said he knew he was innocent, but felt that confessing was the only way out of the interrogation. Thinking that the DNA evidence police claimed to have would rule him out as a suspect, Bradford confessed that he “probably” committed the crime. When the DNA samples turned out to be inconclusive, police and prosecutors still used Bradford’s statement. He was convicted of first-degree rape and first-degree kidnapping and sentenced to 10 years in prison, which he served in their entirety.

Following Bradford's release to community custody in 2006, DNA evidence submitted by the [Washington Innocence Project](#) was analyzed using advanced techniques not available at the time of Bradford’s trial. The results proved Bradford’s innocence, and he became Washington’s first DNA exoneration in 2010.

“I think my case and my experience illustrates perfectly why this bill is needed,” Bradford said in his testimony.

Opponents of the bill, including James McMahan, policy director of the Washington Association of Sheriffs and Police Chiefs, argue that police deception serves a necessary function.

Next: [Cap-and-trade, climate change return to the 2024 WA Legislature](#)

“Sometimes we have to lie to people to get them to tell the truth,” McMahan said in a public hearing. “That’s just an unfortunate reality of law enforcement.”

Some experts say police deception has become obsolete due to the advent of new interrogation methods. According to Trainum, the High Value Detainee Interrogation Group, created by President Barack Obama in 2009, has developed methods that result in more reliable confessions and fewer false confessions without police deception.

McMahan’s comment was surprising to both Rep. Peterson and co-sponsor Rep. Tarra Simmons, who both say trust is necessary to strengthen relationships between law enforcement and communities and to promote police accountability.

“It was really hard to hear him say that and to admit it like that,” said Rep. Simmons, the first formerly incarcerated Washington state legislator. “If we can’t trust our government to behave appropriately, then I don’t feel like we’re living up to the ideals of our country.”

Opponents of HB 1062 also argue that the proposal isn’t necessary. McMahan said case law, judges’ decisions that set examples for future similar cases, already addresses this issue.

Trainum says case law can’t fully address this issue. Although precedent is legally binding, judges can disregard it if they feel it does not apply to the case being decided, known as distinguishing a case. Often case law refers to extremely outrageous cases, according to Trainum, making it easier for judges to distinguish their case from precedent, and ignore it.

“The reason that this law is being proposed is because case law and the application of it is not being effective,” Trainum said. “You only put regulations in place if there’s a problem.”

Next: [Poll: Washington voters want to spend more — while cutting taxes](#)

Laws in other states, such as Illinois, Oregon, Utah and California, prohibit police deception. However, these states restrict its application only to juveniles, a population considered extremely vulnerable to its use. But experts say everyone is susceptible to police deception under the right conditions.

“The propensity to falsely confess is simply human, and it happens everywhere,” Lara Zarowsky, executive director of the Washington Innocence Project, said during the public hearing.

If passed, this bill would likely make Washington the first state to ban police deception on adults, building on past police reform legislation and paving the way for other states to follow suit.

House Bill 1062 is scheduled for a committee vote on Jan. 18.

“This is a national issue, but Washington has the opportunity right now to be a leader on it,” Rep. Simmons said.

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TOPICS: [washington legislature](#)

About the Authors & Contributors

Scarlet Hansen

Scarlet Hansen is a student journalist at the University of Washington and Crosscut's 2024 legislative intern.

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH

INFORMATION SHEET

JOHN E. REID AND ASSOCIATES, INC.
Plaintiff(s)

Case Number: _____

vs

Date: December 18, 2024

JAMES L. TRAINUM
Defendant(s)

One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Deanna H. Clayton	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff
Firm Name: Cozen O'Connor	<input type="checkbox"/> Self (Pro Se)
Telephone No.: (202) 463-2526 DC Bar No.: 90024632	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ Exceeding \$10,000 Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>		
CONTRACT <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Breach of Warranty <input type="checkbox"/> Condo/Homeowner Assn. Fees <input type="checkbox"/> Contract Enforcement <input type="checkbox"/> Negotiable Instrument	COLLECTION/INS. SUB <input type="checkbox"/> Debt Collection <input type="checkbox"/> Insurance Subrogation <input type="checkbox"/> Motion/Application for Judgment by Confession <input type="checkbox"/> Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Discrimination <input type="checkbox"/> Wage Claim <input type="checkbox"/> Whistle Blower <input type="checkbox"/> Wrongful Termination
REAL PROPERTY <input type="checkbox"/> Condo/Homeowner Assn. Foreclosure <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Drug Related Nuisance Abatement	<input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Interpleader	<input type="checkbox"/> Other <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance
ADMINISTRATIVE PROCEEDINGS <input type="checkbox"/> Administrative Search Warrant <input type="checkbox"/> App. for Entry of Jgt. Defaulted Compensation Benefits <input type="checkbox"/> Enter Administrative Order as Judgment <input type="checkbox"/> Libel of Information <input type="checkbox"/> Master Meter <input type="checkbox"/> Petition Other	<input type="checkbox"/> Release Mechanics Lien <input type="checkbox"/> Request for Subpoena MALPRACTICE <input type="checkbox"/> Medical – Other <input type="checkbox"/> Wrongful Death	<input type="checkbox"/> FRIENDLY SUIT <input type="checkbox"/> HOUSING CODE REGULATIONS <input type="checkbox"/> QUI TAM <input type="checkbox"/> STRUCTURED SETTLEMENTS <input type="checkbox"/> AGENCY APPEAL <input type="checkbox"/> Dangerous Animal Determination <input type="checkbox"/> DCPS Residency Appeal <input type="checkbox"/> Merit Personnel Act (OEA) <input type="checkbox"/> Merit Personnel Act (OHR) <input type="checkbox"/> Other Agency Appeal
<input type="checkbox"/> APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT		

Information Sheet, Continued

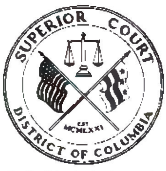
<p>CIVIL ASSET FORFEITURE</p> <p><input type="checkbox"/> Currency</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> Real Property</p> <p><input type="checkbox"/> Vehicle</p> <p>NAME CHANGE/VITAL RECORD AMENDMENT</p> <p><input type="checkbox"/> Birth Certificate Amendment</p> <p><input type="checkbox"/> Death Certificate Amendment</p> <p><input type="checkbox"/> Gender Amendment</p> <p><input type="checkbox"/> Name Change</p>	<p>TORT</p> <p><input type="checkbox"/> Abuse of Process</p> <p><input type="checkbox"/> Assault/Battery</p> <p><input type="checkbox"/> Conversion</p> <p><input type="checkbox"/> False Arrest/Malicious Prosecution</p> <p><input checked="" type="checkbox"/> Libel/Slander/Defamation</p> <p><input type="checkbox"/> Personal Injury</p> <p><input type="checkbox"/> Toxic Mass</p> <p><input type="checkbox"/> Wrongful Death (Non-Medical Malpractice)</p>	
<p>GENERAL CIVIL</p> <p><input type="checkbox"/> Accounting</p> <p><input type="checkbox"/> Deceit (Misrepresentation)</p> <p><input type="checkbox"/> Fraud</p> <p><input type="checkbox"/> Invasion of Privacy</p> <p><input type="checkbox"/> Lead Paint</p> <p><input type="checkbox"/> Legal Malpractice</p> <p><input type="checkbox"/> Motion/Application Regarding Arbitration Award</p> <p><input type="checkbox"/> Other - General Civil</p>	<p><input type="checkbox"/> Product Liability</p> <p><input type="checkbox"/> Request for Liquidation</p> <p><input type="checkbox"/> Writ of Replevin</p> <p><input type="checkbox"/> Wrongful Eviction</p> <p>CIVIL I/COMPLEX CIVIL</p> <p><input type="checkbox"/> Asbestos</p> <p>MORTGAGE FORECLOSURE</p> <p><input type="checkbox"/> Non-Residential</p> <p><input type="checkbox"/> Residential</p>	<p>STATUTORY CLAIM</p> <p><input type="checkbox"/> Anti - SLAPP</p> <p><input type="checkbox"/> Consumer Protection Act</p> <p><input type="checkbox"/> Exploitation of Vulnerable Adult</p> <p><input type="checkbox"/> Freedom of Information Act (FOIA)</p> <p><input type="checkbox"/> Other</p> <p>TAX SALE FORECLOSURE</p> <p><input type="checkbox"/> Tax Sale Annual</p> <p><input type="checkbox"/> Tax Sale Bid Off</p>
<p>VEHICLE</p> <p><input type="checkbox"/> Personal Injury</p> <p><input type="checkbox"/> Property Damage</p> <p><input type="checkbox"/> TRAFFIC ADJUDICATION APPEAL</p> <p><input type="checkbox"/> REQUEST FOR FOREIGN JUDGMENT</p>		

Deana Clayton

Filer/Attorney's Signature

12/18/24

Date



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

JOHN E. REID AND ASSOCIATES, INC.

Plaintiff

vs.

Case Number 2024-CAB-007957

JAMES L. TRAINUM

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Deanna H. Clayton

Clerk of the Court

Name of Plaintiff's Attorney

Cozen O'Connor, 2001 M St. NW, Suite 500

Address
Washington, DC 20036

(202) 463-2526

Telephone

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828로 전화주세요. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

By _____

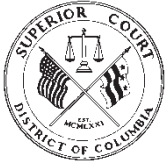
Date _____



IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
 Veá al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

 Nombre del abogado del Demandante

Por: _____
 Subsecretario

 Dirección

Fecha _____

 Teléfono

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original



**Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov**

Case Number: 2024-CAB-007957

Case Style: John E. Reid and Associates, Inc. v. James L. Trainum

INITIAL ORDER

Initial Hearing Date: Friday, 03/21/2025	Initial Hearing Time: 9:30 AM	Courtroom Location: Remote Courtroom 212
Please see attached instructions for remote participation.		
Your case is assigned to Associate Judge Yvonne Williams.		

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("Super. Ct. Civ. R.") 40-1, it is hereby ORDERED as follows:

- 1) This case is assigned to the judge and calendar designated above. All future filings in this case shall bear the calendar number and judge's name along with the case number in the caption.
- 2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of the summons, the complaint, and this Initial Order. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4.
- 3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).
- 4) At the time stated above, all counsel and unrepresented parties shall participate in a hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients before the hearing whether the clients are agreeable to binding or non-binding arbitration. This order is the only notice that parties and counsel will receive concerning this hearing.
- 5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference once, with the consent of all parties, to either of the two succeeding days when the calendar is called. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date. No other continuance will be granted except upon motion for good cause shown.
- 6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Milton C. Lee, Jr.

To Join by Computer, Tablet, or Smartphone:

- 1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb212

Meeting ID: 129 440 9070

- 2) When you are ready, click “Join Meeting”.
- 3) You will be placed in the lobby until the courtroom clerk gives you access to the hearing.

Or to Join by Phone:

- 1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)
- 2) Enter the Webex Meeting ID listed above followed by “##”

Resources and Contact Information:

- 1) For best practices on how to participate in Webex Meetings, click here <https://www.webex.com/learn/best-practices.html>.
- 2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.
- 3) For case questions, call the Civil Actions Branch Clerk’s Office at 202-879-1133.
- 4) To change your method of hearing participation, visit www.dccourts.gov/hearing-information for instructions and forms.

ACCESSIBILITY AND LANGUAGE ACCESS

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call 202-879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office listed for your case. For more information, visit <https://www.dccourts.gov/language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría de su caso.

Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። የቃል ወይም የጽሑፍ ትርጓሜ ለመጠየቅ እባክዎን በመዝገብዎ የተዘረዘረውን የጸሀፊ ቢሮ (ክለርክ'ስ ኦፊስ) ያናግሩ። ለተጨማሪ መረጃ <https://www.dccourts.gov/language-access> ይጎብኙ።

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Tips for Attending Remote Hearings - Civil Division

Your court hearing may be held remotely. This means that you will participate by phone or by video conference instead of coming to the courthouse. Here are some tips on how to prepare.

How do I know if I have a remote hearing?


The Court will contact you to tell you that your hearing is remote. They may contact you by sending you an email, letter in the mail, or by calling you.



How do I take part in a remote hearing?

The Court will give you step-by-step instructions on how to take part in the remote hearing.

If you lose your written notice, call the Civil Actions Clerk's Office for instructions at:

 202-879-1133

Is there anything that I should do before the day of the hearing?

- Let the court know immediately if you cannot join a hearing because you do not have a phone or computer.




Civil Actions Clerk's Office: 202-879-1133

- You may want to contact an attorney for legal help.
- You can also find the list of legal services providers at www.dccourts.gov/services/represent-yourself by clicking on the link that says, "List of Legal Service Providers for Those Seeking an Attorney or Legal Advice".
- Evidence: if you want the judge to review photos or documents, ask the judge how to submit your evidence.
- Witnesses: tell the judge if you want a witness to testify at your hearing.
- Accommodations & Language Access: let the court know if you need an interpreter or other accommodation for your hearing.

Tips for the Hearing



- Join the hearing a few minutes early!
- Charge your computer or phone and make sure you have enough minutes to join the call. Find a private and quiet space. If possible, be alone in a room during the hearing. Try to limit distractions as much as possible. If others are in the room with you, ask if they can be quiet during the hearing.
- Mute your microphone when you are not talking. Mute all sounds on your phone or computer.
- Say your name before you speak so the record is clear. Be prepared to identify your role in the hearing (e.g., observer, plaintiff, defendant, witness, etc.). 
- Speak slowly and clearly so everyone hears what you are saying.
- Pause before speaking in case there is a lag. Use a headset or headphones if you can. This will free up your hands and sound better.
- Try not to talk over anyone else. Only one person can speak at a time. If you talk while someone else is talking, the judge will not be able to hear you.
- Have all your documents for the hearing in front of you. Have a pen and paper to take notes.
- If you are not ready for your hearing or want to speak with an attorney, you can ask the judge to postpone your hearing for another date.
- If your sound or video freezes during the hearing, use the chat feature or call the Clerk's Office to let them know that you are having technical issues.

Special Tips for Video Hearings



[\(Click here for more information\)](#)

- Download the court's hearing software, WebEx, in advance and do a test run! The Court will provide you with a WebEx link in advance of the hearing.
- Set up the camera at eye level. If you are using your phone, prop it up so you can look at it without holding it.
- Look at the camera when you speak and avoid moving around on the video.
- Wear what you would normally wear to court.
- Sit in a well-lit room with no bright lights behind you.
- If possible, find a blank wall to sit in front of. Remember the judge will be able to see everything on your screen, so pick a location that is not distracting.



District of Columbia Courts



Tips for Using DC Courts Remote

The DC Courts have **remote hearing sites** available in various locations in the community to help persons who may not have computer devices or internet service at home to participate in scheduled remote hearings. The Courts are committed to enhancing access to justice for all.

There are six remote access sites throughout the community which will operate: **Monday – Friday, 8:30 am – 4:00 pm.**

The remote site locations are:

<p>Remote Site - 1 Balance and Restorative Justice Center 1215 South Capitol Street, SW Washington, DC 20003</p>
<p>Remote Site - 2 Balance and Restorative Justice Center 1110 V Street, SE Washington, DC 20020</p>
<p>Remote Site - 3 Balance and Restorative Justice Center 118 Q Street, NE Washington, DC 20002</p>



<p>Remote Site - 4 Balance and Restorative Justice Center 920 Rhode Island Avenue, NE Washington, DC 20018</p>
<p>Remote Site - 5 Reeves Center 2000 14th Street, NW, 2nd Floor Community Room Washington, DC 20009</p>
<p>Remote Site - 6 Reeves Center 2000 14th Street, NW, Suite 300N Office of the Tenant Advocate Washington, DC 20009 <i>*** No walk-ins at this location***</i></p>

If you want to use a remote site location for your hearing, call **202-879-1900** or email DCCourtsRemoteSites@dcsc.gov at least **24 hours before your hearing to reserve a remote access computer station**. If you require special accommodations such as an interpreter for your hearing, please call **202-879-1900 at least 24 hours in advance of your hearing so the Courts can make arrangements**.

You should bring the following items when you come to your scheduled site location

1. Your **case number** and any **hyperlinks** provided by the Courts for your scheduled hearing.
2. Any documents you need for the hearing (evidence), including exhibits, receipts, photos, contracts, etc.
3. Materials for notetaking, including pen and paper.

***Safety and security measures are in place at the remote sites.**

Contact information to schedule your remote access computer station:

Call: **202-879-1900**

Email: DCCourtsRemoteSites@dcsc.gov



Tribunales del Distrito de Columbia

Consejos para usar los sitios de audiencia remota de los Tribunales de DC



Los Tribunales de DC disponen de **sitios de audiencia remota** en distintos centros de la comunidad para ayudar a que las personas que no tienen dispositivos informáticos o servicio de Internet en su casa puedan participar en audiencias remotas programadas. Los Tribunales honran el compromiso de mejorar el acceso de toda la población a la justicia.

En toda la comunidad hay seis sitios de acceso remoto que funcionarán de **lunes a viernes, de 8:30 am a 4:00 pm.**

Los centros de acceso remoto son:

<p>Sitio Remoto - 1 Balance and Restorative Justice Center 1215 South Capitol Street, SW Washington, DC 20003</p>
<p>Sitio Remoto - 2 Balance and Restorative Justice Center 1110 V Street, SE Washington, DC 20020</p>
<p>Sitio Remoto - 3 Balance and Restorative Justice Center 118 Q Street, NE Washington, DC 20002</p>



<p>Sitio Remoto - 4 Balance and Restorative Justice Center 920 Rhode Island Avenue, NE Washington, DC 20018</p>
<p>Sitio Remoto - 5 Reeves Center 2000 14th Street, NW, 2nd Floor Community Room Washington, DC 20009</p>
<p>Sitio Remoto - 6 Reeves Center 2000 14th Street, NW, Suite 300N Office of the Tenant Advocate Washington, DC 20009 <i>*No se puede entrar sin cita previa*</i></p>

Si desea usar un sitio remoto para su audiencia, llame al **202-879-1900** o envíe un mensaje de correo electrónico a DCCourtsRemoteSites@dcsc.gov **al menos 24 horas antes de la audiencia, para reservar una estación de computadora de acceso remoto.** Si necesita adaptaciones especiales, como un intérprete para la audiencia, llame al **202-879-1900 al menos 24 horas antes de la audiencia para que los Tribunales puedan hacer los arreglos necesarios.**

Cuando concurra al sitio programado debe llevar los siguientes artículos

1. Su **número de caso** y todos los **hipervínculos** que le hayan proporcionado los Tribunales para la audiencia programada.
2. Cualquier documento que necesite para la audiencia (prueba), incluidos documentos probatorios, recibos, fotos, contratos, etc.
3. Materiales para tomar nota, como papel y lápiz.

***Los sitios de acceso remoto cuentan con medidas de seguridad y protección.**

Información de contacto para programar su estación de computadora de acceso remoto:

Teléfono: **202-879-1900**

Correo electrónico: DCCourtsRemoteSites@dcsc.gov