



BROOKLINE POLICE DEPARTMENT

Office of Professional Responsibility

SUPT MARK P. MORGAN
ACTING CHIEF OF POLICE

LT. PAUL R. CAMPBELL
Office of Professional Responsibility

To: Superintendent Mark Morgan

From: Lieutenant Paul Campbell

Date: February 1, 2021

Subject: Lieutenant Paul Cullinane – Adeniyi Ijanusi – Sanctuary – IA# 2020-7

Sir:

On December 18, 2020 I received an email which contained information regarding an allegation against Lieutenant Paul Cullinane. The allegation is related to an incident that occurred at Sanctuary Medicinals, which is a marijuana establishment located at 1351 Beacon Street in Brookline. The incident occurred on August 31, 2020, and was later submitted to Lieutenant Cullinane to be investigated. Lieutenant Cullinane submitted a 7 page report on this incident two weeks later, on September 14, 2020 (report added to file). An allegation about Lieutenant Cullinane and this report has since been made by Mr. Adeniyi Ijanusi, who is a former security officer for Sanctuary Medicinals. Mr. Ijanusi has complained that Lieutenant Cullinane lied in his report related to the August 31, 2020 incident. The nature of the complaint is spelled out in a December 7, 2020 email Mr. Ijanusi wrote to Lieutenant Cullinane. That email is reproduced in its entirety here:

Paul Cullinane

I would say I am disappointed in your actions as a officer of the law who is bounded by oath to tell the truth but I would be lying. As a member of the Brookline minority population and community it is well known and documented that your department is known to be racist and bias, especially you who is known to have issue with black males in the position of authority. Which is what I Witnessed when you visited sanctuary medicinal. You wouldn't talk to me as the security lead to give you the tour and run down of our operations (most protocols which I designed) from security perspective but would take the from my white surbodinate, disgraceful but expected from you. Now you probably thought I wouldn't have gotten a copy of your report dated September 14 2020, which are filled with lies about me and a complete cover up for you buddy which is the director of security at sanctuary medicinal.



1 what policy did I violate. Funny how you mentioned I spoke to the manager Steve and marketing director Dave kimmel both of which are management and you found that both who are management employees of SM who were informed by the non management staff did not violate the same policy. Also I need you to provide proof you found during your funny investigation that non management employees were trained on the Sm policy I violated because obviously you are recommending they train employees on what to do which clearly shows that it was never done

2 I specifically told you in the email I sent you not to involved my name and remain anonymous but yet you did exactly what I asked you not to do without my consent. Not only did you do so you intentionally threw me under the bus by finding guilty of violating SM policy, your report has led to my job being compromised. Your report cost me my job just wanted you to know that, which from your lying and cover up on your report was intentional.

3 I wonder why when there is a video you adding pictures to your reports and funny some of those pictures were not timed stamped as required by ccc regulations(talk about a violation in the report itself)

4 I need you to show me when and where I told you a diversion took place. I did not mention it in my only email to you. We never spoke on the phone so i will like to know where. Your report confirmed minors were on the premises. In your report you also said they opened the bags which means at any time they(who ever they are in your report) including the minor touching the bag is a violation of ccc regulations The point was no police detail on site, had minors loitering on premises which could have been avoided if the police details were present and if you had done your job rather than try to cover Up by throwing me under the bus we would not be here.

You remind me of the reasons why people like me lose confidence and trust in the police . I keep running into the poster child for bad policing . If you lied about this report I wonder how many lies you have told in your other reports. Kindly fix the lies about me in your reports by correcting all wrongful statement made about me (especially stating I violated which cost me my job) I cannot afford my name, job reputation tarnished because of some falsified report. Refusal to do so is an acknowledgement of my alleged wrong doing and I will be taking all legal avenues and resources available to me. This is not going to be the usual narrative of lying on the black guy and getting away with it. Do not call me or reach me unless your report has been corrected to state the true events that transpired August 31st 2020 which I would like a copy of since as you stated my named has been mentioned out there

Ade

I have reviewed the September 14th report by Lieutenant Cullinane. I was also provided a copy of the video of the August 31, 2020 incident by Sanctuary Medicinals General Manager Jamie Cevelo, who sent me an email link to the video content. The video shows the following: At approximately 5:24 PM a vehicle pulled into the Sanctuary parking lot, occupied by a man and a woman. The male is later identified as [REDACTED] [REDACTED] (22 years old) and the female is identified as [REDACTED] [REDACTED] (20 years old). Both parties exit the vehicle, and Mr. [REDACTED] eventually enters Sanctuary and purchases marijuana products. Ms. [REDACTED] does not enter the premises and can be seen on the security cameras around the front of the store with a few other people. At 5:52:35 PM Mr. [REDACTED] is seen exiting through the side door of Sanctuary with a paper bag in his hand, which



appears to be marijuana product he had just purchased from Sanctuary. He walks to the front of store area where he engages with a small group of people, which includes Ms. [REDACTED] Mr. [REDACTED] is seen speaking with members of the group, but he appears to retain possession of the bag at all times. At 5:54:16 PM Mr. [REDACTED] is seen walking down the alleyway toward the parking lot where his vehicle is parked. Ms. [REDACTED] had walked in that direction a few seconds prior and reached the parking lot before Mr. [REDACTED]. Another female from the group, later identified by Lieutenant Cullinane as [REDACTED] (20 years old) is also seen in the parking lot wearing a backpack and doing something on her phone. When Mr. [REDACTED] arrives at the parking lot he is seen holding the paper bag, and he then opens the bag and looks into it to view the contents. Mr. [REDACTED] appears to reach into the bag and pulls something out with his right hand and then turns and gestures toward Ms. [REDACTED] with the bag. Ms. [REDACTED] does not take the bag from Mr. [REDACTED] and at this point Mr. [REDACTED] turns and walks to his vehicle, opens the passenger side door, and places the bag in the vehicle. Mr. [REDACTED] appears to still have the item he had removed from the bag in his hand as he does this. At 5:54:50 PM, Ms. [REDACTED] is then seen reaching into the passenger side of the vehicle and removing the bag Mr. [REDACTED] had just placed in the vehicle. She then reaches into the bag twice and appears to remove items (given the distance of the camera angle it is not clear if she removes one item or two, but it appears to be two). Mr. [REDACTED] is standing with Ms. [REDACTED] when this occurs, but he does not do anything in furtherance of Ms. [REDACTED] taking possession of the bag or its contents. Mr. [REDACTED] then walks around the vehicle to the driver's side and places an item on the roof of the vehicle, while Ms. [REDACTED] tosses the bag into the passenger side of the vehicle, while still appearing to have an item in her hand. Ms. [REDACTED] then walks over to Mr. [REDACTED] side of the vehicle and they both appear to be fidgeting with items in their hands. From the video it is not clear to me what they are doing, although I do not agree with the statement by Mr. Ijanusi that either party appears to "roll up." Based on what can be seen I do not believe either party is "rolling" any product into a marijuana cigarette. To the contrary it appears as though they are struggling with the product, almost as if they are attempting to open something and having difficulty doing it. Ms. [REDACTED] then walks back to the passenger side of the vehicle, at which point she places the item she was holding back in the vehicle. She then walks back over to the driver's side of the vehicle and briefly picks up the item that Mr. [REDACTED] had placed on the roof, and she then places the item back down on the roof. Mr. [REDACTED] then takes the item and puts it inside the vehicle. Both Mr. [REDACTED] and Ms. [REDACTED] then walk through the alleyway toward Beacon Street, at which point Mr. Ijanusi can be seen exiting through the side door to come speak with them (5:56:58 PM). Mr. Ijanusi has a brief conversation with them as they walk toward Beacon Street, where they then meet up with the rest of the group. Mr. Ijanusi returns to Sanctuary and Mr. [REDACTED] and Ms. [REDACTED] remain outside (5:57:30 PM). They then return to their vehicle and drive away at approximately 6:19 PM.

In addition to Mr. [REDACTED] it does appear that two other men from the group on Beacon Street made purchases at Sanctuary. At approximately 6:12:43 PM, a male from the group (later identified as [REDACTED] [REDACTED] makes a purchase from Sanctuary. While he is at the counter, a 3rd male from the group (identified as [REDACTED] [REDACTED] age 22) also makes a purchase. These purchases are completed and Mr. [REDACTED] and Mr. [REDACTED] then exit through the side door at approximately 6:20 PM. The men then walk toward Beacon Street where they are seen turning left and walking westbound. The video file does not show where they walked, but it was reported to me by Lieutenant Cullinane that these men walked to their vehicle on Beacon Street and drove away. Although there do not appear to be any allegations connected with these purchases, they are included here for



completeness as they occurred during the same timeline as some of the events that have led to this investigation.

In the September 14, 2020 report on this incident by Lieutenant Cullinane, his conclusions are as follows (page 7 of Lt. Cullinane report):

1. He observed no diversion of marijuana to anyone under age 21
2. He observed no public consumption of marijuana
3. He observed no security log entries for the date in question
4. Lieutenant Cullinane also recommended that Sanctuary take steps to ensure that their policies and regulations were being followed.

Although I agree with the conclusions drawn by Lieutenant Cullinane, I will comment that conclusion #1 is a difficult matter to definitively decide. The cannabis industry is relatively new, and in large part operates pursuant to the Code of Massachusetts Regulations, 935 CMR 500. Because the industry is so new, there has not yet been a body of litigation to specifically define what constitutes a violation and what does not. As part of this investigation, I have done research as well as interviewed people connected with Sanctuary Medicinals. In Lieutenant Cullinane's report he concluded that he observed no "diversion" of marijuana to anyone under age 21. Although the word "diversion" is used in various locations in cannabis documents and regulations, there does not appear to be a precise definition of what that word means or how it is defined in the context of the marijuana industry. As such it is difficult to say what specifically qualifies as a "diversion" and what does not. When I interviewed Mr. Kimmel and Ms. Cevelo, they both acknowledge that there does not seem to be a clear definition of diversion, but they generally understood the word to refer to a circumstance where a person buys marijuana and then gives that marijuana to be used by someone else who cannot lawfully purchase it, or for someone who may resell the product. Absent some specific guidance from state statute or a regulatory agency, I interpret the term "diversion" of marijuana to a person under 21 to mean procuring marijuana products for another person who is under the age of 21. Others may suggest a different definition, but absent some guidance from the legislature or the courts, the best we can do is to use a reasonable interpretation of the word based on what is believed to have been the intent of the legislation and regulations. As I interpret the meaning of the word diversion in the context of the marijuana industry, I agree with Lieutenant Cullinane that the evidence does not support a finding that a "diversion" occurred based on what is seen on the video. There does appear to be a brief instance of Ms. [REDACTED] "possessing" marijuana, which at most would be a civil infraction for which no criminal penalty could possibly attach. But it is important to note that when Ms. [REDACTED] takes possession of the product she does so by reaching into the vehicle and taking possession of it, and is not handed the product by Mr. [REDACTED]. Furthermore, after she handles the product Ms. [REDACTED] is seen returning the product to the vehicle to the same place where Mr. [REDACTED] had put it originally. In his email to Lieutenant Cullinane Mr. Ijanusi alleges that he saw that Mr. [REDACTED] "hands the bag to the young lady and proceeds to roll up in the parking lot." This is not what occurred. Ms. [REDACTED] took the bag out of the car, and further the video does not appear to show Mr. [REDACTED] "rolling up" as claimed by Mr. Ijanusi. Given the distance and the video quality, Mr. Ijanusi may have seen Mr. [REDACTED] in the parking lot and mistakenly wondered if he may be "rolling up," however a closer look at the video shows fairly conclusively that he was not doing this. The interaction where Mr. Ijanusi had claimed that Mr. [REDACTED] had handed the bag to Ms. [REDACTED] is



very clear however and not something that could have been misunderstood by Mr. Ijanusi. The video shows definitively that it did not happen.

As to conclusions two and three by Lieutenant Cullinane, there is no evidence of any public consumption by anyone connected with this incident. I believe this to be understood by all parties, and I do not believe Mr. Ijanusi has alleged that there was any public consumption. I did also review the security logs for Sanctuary Medicinals, and as Lieutenant Cullinane noted there is no notation related to any incidents on August 31, 2020. As to conclusion #4, Lieutenant Cullinane has recommended that Sanctuary take steps to ensure that their policies are followed, which appears to be reasonable advice for Sanctuary or any other business. This is not a recommendation of sanctions, nor is it a claim that the company has not undergone any kind of training in the past. But as I pointed out above, this is a company operating in a new community in a relatively new industry, it is natural that there will be times when training is appropriate. There is certainly no misconduct by a Police Lieutenant to recommend that a company do training to make sure they operate in line with their policies.

As part of my investigation I attempted to interview Mr. Ijanusi. I emailed Mr. Ijanusi on two occasions, and in response to my second email I received a reply. Based on the email reply I was uncertain as to Mr. Ijanusi's willingness to participate in this investigation. The participation of Mr. Ijanusi is important because although he has made the allegation that Lieutenant Cullinane has lied in his report, to date I am unaware of any specific statement(s) in Lieutenant Cullinane's report that are alleged to be lies. The allegations by Mr. Ijanusi are general in nature, he refers to Lieutenant Cullinane's report by saying, *"If you lied about this report I wonder how many lies you have told in your other reports. Kindly fix the lies about me in your reports by correcting all wrongful statement made about me (especially stating I violated which cost me my job) I cannot afford my name, job reputation tarnished because of some falsified report."* He does not identify what these "lies" are and having read the report and viewed the video, I do not see any false statements by Lieutenant Cullinane. It is something that I would like to ask Mr. Ijanusi to clarify for me, but to this point he has not been willing to participate in this process. When he responded to my email he sent a list of 12 questions that he wanted me to answer before he would decide if he will participate. The email he sent is quoted below (received on December 29, 2020 at 8:20 AM):

Sir,

As much as I will like a conversation with you, on the issue regarding your e-mail, I am not comfortable based on all my past experiences with officers from the BPD who have discriminated and targeted me. Their actions have affected my livelihood as well as my reputation and character. I have a few questions regarding your requested conversation.

- 1. What is the investigation procedures prior to the hearing?*
- 2. Why is a lieutenant investigating someone of same rank? Shouldn't it be someone in a superior position?*
- 3. How can I have confidence and know that this is a good faith investigation with transparency?*



4. *I will like to know who asked you to contact me regarding this investigation?*
5. *I would like Donelle O' Neil (included in Lt. Cullianne's report) present at the zoom interview.*
6. *Please confirm that I can have my legal counsel there with me?*
7. *What is the purpose of this investigation and how long will this take? Do you plan on calling witnesses including those employed by Sanctuary? (Please note that the witnesses employed by Sanctuary in Lt Cullianne's police report lied in that report.)*
8. *If I should disagree with the investigation outcome, is there an appeal process and what does it entail?*
9. *Can the meeting be recorded and a transcript made?*
10. *I want to confirm that I will have an opportunity to mention What is false about both Lt. Cullianne's report on sanctuary medicinal (dated 14 sept 2020 17 sept 2020). Do you have video evidence (parking lot, frontview, front door, lobby, main floor, bathroom) from 5.24pm--6.19pm, to show the actual event of August 31st as to what Lt culianne says happened. The 9 photos on Lt. Cullianne's report only shows a 9 secs still frame from a 54 minute video and his explanation of events. That report is not a legal report by CCC and state regulations because some of those pictures are not timed stamped as required by CCC and state regulation (dispensary must be 24/7 365 days with no blind spots must be under timed stamped surveillance). how come non timed stamped pictures in Lt culianne report are from the same camera as the time stamped one in the same report, and why does some of those pictures not have time stamped on them n some do from the same camera. Just a few of many of what i have to mention and ask about Lt culiane report*
- 11 *why was no police detail present on site that day required by the HCA and who approved or decided on withdrawing the police detail during business hours (not an isolated event that day).*
12. *Can I record this through my facebook live, or is there a written policy against doing so?*

Regards,

Ade

Upon receiving this email from Mr. Ijanusi I responded with the following email (sent December 29, 2020 at 9:21 AM):

Sir:

Thank you for responding.

I was asked to investigate this matter by the Acting Chief of Police, and the purpose of my investigation is to ascertain if there was any misconduct by Lieutenant Cullinane. From what I have read it appears you have stated that Lieutenant Cullinane has lied in his report. Just so there is no misunderstanding, my role here is to investigate misconduct allegations related to police department employees only; I do not investigate actions by outside agencies. Actions taken or not



taken by Sanctuary are outside the scope of my review, as is the decision regarding whether or not a detail officer should be hired at that location. I am acting on behalf of the Chief of Police and my report will go directly to the Chief. I do not have any objection to the interview being recorded, but it would be improper for an open investigation to be broadcast publically. To do that could have the effect of tainting any other witnesses that may exist. I do not have a problem with someone else being present in the interview, whether it is Donelle or an attorney, however it is important to understand that they would not be allowed to answer any questions as none of them were present and so they are not direct witnesses to anything that has occurred. But I know some people feel more comfortable when they have someone else present with them, and that is not a problem.

In your response (item #1) you asked about “the investigation procedures prior to the hearing,” I am unsure what this means. It is simply my role to investigate if there was misconduct by Lieutenant Cullinane. I am unaware of any hearing that is scheduled, and if there is one this investigation is not connected with that. My role is the conduct of Lieutenant Cullinane only. If there are other matters or hearing scheduled, those are separate and I have no knowledge of them.

As to item #10 where you wrote about having the opportunity to speak about what is false in the report, the answer is yes and this is the primary reason that I want to talk to you. I am aware of the allegation that Lieutenant Cullinane has lied, however I am not aware of which statements in his report you are specifically referring to. It is my hope that you will identify what specifically he lied about to assist me in investigating this. I do have the video, as well as Lieutenant Cullinane’s report dated September 14th (you also referenced something from September 17th but I’m not certain what you are referring to?). You also mentioned something about a CCC and state regulation regarding photos being timestamped and I am unsure what that refers to as I am unaware of a regulation requiring all photos included in a report to be timestamped. But the timestamp issue aside I am also trying to understand if there is an allegation that somehow those photos were tampered with or do not fairly and accurately represent what occurred?

Please let me know if you are willing to speak with me, or perhaps in the alternative if you decline to speak with me if you are willing to respond to my questions and provide information over email. I am still able to investigate cases without the participation of the complainant, but in my experience if the complainant declines to participate in the investigation those cases are much more difficult to prove.

Thank you

As of the time of this report, Mr. Ijanusi has made no further contact with me and provided no further information regarding this investigation.

Although it is not entirely clear to me exactly what is being suggested/alleged, there seems to be a suggestion that Lieutenant Cullinane may have in some way tampered with or manipulated the security video, and/or that he inappropriately included screenshots in his report that are not timestamped. I have interviewed Lieutenant Cullinane on this topic and he has stated that any suggestion that he tampered with or inappropriately altered any audio/video evidence is a false claim. He stated that he would never do this, and further that he is a technology novice and does not have the know-how to alter any such files. I have reviewed the video of this incident, which is located on a Google Drive and came to me from Sanctuary Medicinal (it did not come from



Lieutenant Cullinane, and he would have no way to alter the copy in my possession). The video is the same video Lieutenant Cullinane viewed, and there does not seem to be anything that was tampered with or used inappropriately. Furthermore, I am not aware of any specific claim that there has been any alteration of the video file that is mentioned in Lieutenant Cullinane's report. There are ten screenshots taken from the security footage that have been included in Lieutenant Cullinane's report, and of those ten only six of them have timestamps. Four of the screenshots do not have timestamps. Of the photos that do not have timestamps, two were close up photos of the faces of people in the area of the incident, and these were used for comparison purposes with photos taken from social media to confirm the identity of the people in the photos. In that scenario, the issue of a timestamp to show the exact instant it was taken appears to be irrelevant. There is no question the photos are taken during the course of events that led to this investigation, and I'm unable to identify any significance of the exact minute/second that the photo was snapped. The other two screenshots that do not bear timestamps show photos of two individuals greeting each other in the alleyway. I asked Lieutenant Cullinane why these screenshots do not have timestamps, to which he told me that when he was taking the screenshots, he inadvertently cropped too much of the top of the image, and as such the timestamp was not included in the photo. This occurred as he was zooming in on the subjects in the photo so they would appear less distant and be easier to view. He said that these two photos were included to show that the people on the video were known to each other, and the exact time of this interaction was not particularly relevant. I have reviewed the video and taken my own screenshots of the photos in the alleyway, and included them below. In my photos I did not use the zoom feature, and as a result my screenshots appear to be more distant than the photos in Lieutenant Cullinane's report. You will note that my screenshots include a timestamp on the top of the photo, as well as a notation on the bottom left corner that this photo came from the "Side Exterior(1)" camera. The timestamp notwithstanding, the photos I included depict the same image as Lieutenant Cullinane's photos and have not been altered in any way.



Photos submitted by Lieutenant Paul Cullinane in his report



Screenshots taken by Lieutenant Paul Campbell as part of this investigation



While I do believe that including the time stamp is generally a better practice, the absence of a time stamp in these photos does not render them deceptive or in some way improper. The photos were included to show that the two people in the pictures know each other, which the photos clearly do demonstrate. The exact time of these photos is not particularly important, especially where the general time frame is already known based on other video/photos. If the timing of the photos was off by a few minutes in either direction, it would have no impact on the information gained by the inclusion of these photos, namely that the parties know each other. There could well be other cases where the exact time that something occurs is an important piece of information, but that is not the case here. In these photos the viewer can clearly see two people walk up to each other and hug, and from this information a strong conclusion is drawn that the parties already know each other. Under these circumstances I don't see how it would be important to know the exact second that this hug occurred.

In his email, Mr. Ijanusi has alleged that the lack of a timestamp is in some way not lawful and a violation of state regulations and a violation of Cannabis Control Commission Standards. Specifically, what was written is (included above but also reproduced here):



“That report is not a legal report by CCC and state regulations because some of those pictures are not timed stamped as required by CCC and state regulation (dispensary must be 24/7 365 days with no blind spots must be under timed stamped surveillance). how come non timed stamped pictures in Lt culianne report are from the same camera as the time stamped one in the same report, and why does some of those pictures not have time stamped on them n some do from the same camera. Just a few of many of what i have to mention and ask about Lt culiane report”

I have done research on this claim by Mr. Ijanusi and do not believe he has an accurate understanding of the law or regulations on this point. Lieutenant Cullinane does not work for the Cannabis Control Commission nor is he employed in the cannabis industry. As such, even if the Cannabis Control Commission did have a regulation as claimed by Mr. Ijanusi, it would not apply to Lieutenant Cullinane. But a review of the Code of Massachusetts Regulations on this topic shows that the regulations make no mention regarding the inclusion of timestamps in photos included in investigative reports. There are several areas in the CMRs where the Cannabis Control Commission requires date/time stamps on security videos, but that regulation applies to the business that is selling marijuana and their security equipment, not a police lieutenant doing an investigation. An example of such a regulation is below:

935 CMR 500.110(5)(7)

Security and Alarm Requirements for Marijuana Establishments Operating Enclosed Areas.

(a) A Marijuana Establishment located, in whole or in part, in a building, Greenhouse or other Enclosed Area shall have an adequate security system to prevent and detect diversion, theft or loss of Marijuana or unauthorized intrusion, utilizing commercial grade equipment which shall, at a minimum, include:

7. *A date and time stamp embedded in all recordings, which shall be synchronized and set correctly at all times and shall not significantly obscure the picture* (emphasis added)

There is nothing in the above regulation that would require any screenshots used in an investigative report by a police lieutenant to also include timestamps. This is not to suggest that including the timestamp wouldn't be a good practice, because it does provide additional information regarding the photo being included in the report. But what Mr. Ijanusi has suggested is that what Lieutenant Cullinane has done is in some way unlawful or deceptive or otherwise falls short of a mandatory state regulation. Mr. Ijanusi does not identify any law or regulation that states this, and I am unable to find anything in the law or regulations to support his allegation. This claim appears to be without merit.

Another allegation made by Mr. Ijanusi is that he suggests that Lieutenant Cullinane has a “buddy” who is the director of security at Sanctuary, and that his report is a “complete cover up” for the director of security. Mr. Ijanusi wrote:

“Now you probably thought I wouldn't have gotten a copy of your report dated September 14 2020, which are filled with lies about me and a complete cover up for you buddy which is the director of security at sanctuary medicinal.”



The director of security for Sanctuary Medicinals is a man named Michael Allen. I asked Lieutenant Cullinane about him and their relationship. Lieutenant Cullinane said that he had never met anyone from Sanctuary Medicinals prior to their beginning their business venture in Brookline. He does not know Mr. Allen well and does not consider him his “buddy.” He said that he has met Mr. Allen twice, both times were before Sanctuary opened in Brookline. He has not seen him since and does not understand why it has been suggested they are “buddies.” I followed up with Mr. Allen and spoke with him on the phone on this topic as well. He confirms what Lieutenant Cullinane has said, he recalled meeting Lieutenant Cullinane but aside from meeting him early on in the business venture he does not know Lieutenant Cullinane nor are they friends. It is also noteworthy that when I asked Lieutenant Cullinane for cell phone numbers for members of Sanctuary employees that I may need to speak to, he was able to quickly provide me the telephone numbers for General Manager Jamie Cevelo and Director of Business Development David Kimmel. But for Mr. Allen he did not have a telephone number for him and needed to go searching through some of his Sanctuary Medicinals paperwork to locate that phone number. The suggestion that they are “buddies” and that Lieutenant Cullinane engaged in a coverup because of his relationship with Mr. Allen is not supported by any evidence.

In addition to items discussed above in this report, there are two issues that became known to me that I believe should be mentioned. Although they are not directly within my purview, this information does have some connection with the items I looked into and I think warrant brief mention. These are discussed below:

One item that has come to light since I began this investigation related to the allegation by Mr. Ijanusi that Lieutenant Cullinane has lied about him in his report and that this led directly to him being fired from his job (statement in email was that this report “cost me my job”). When I interviewed Ms. Cevelo, she advised me that Mr. Ijanusi was terminated from his job for conduct that is completely unrelated to the report by Lieutenant Cullinane. Because the personnel decisions by Sanctuary are beyond the scope of my investigation, I did not inquire into the merits of the decision to terminate Mr. Ijanusi. However, what I did learn from Ms. Cevelo was the following: Mr. Ijanusi was hired for the position of Security Lead, which is a security supervisor position. He began work on approximately July 24, 2020. During the month of August, Mr. Ijanusi informed the company that he would need to take two weeks off, and the company decided to grant this time to Mr. Ijanusi despite the fact that he had only worked for them for a few weeks and not yet accrued any earned time off. Mr. Ijanusi’s requested time off was set to begin on September 1, 2020, which coincidentally was the day after the August 31st incident that led to the investigation by Lieutenant Cullinane. Lieutenant Cullinane’s investigative report regarding the August 31st incident was submitted on September 14th. Mr. Ijanusi was scheduled to return to work from his two-week hiatus that upcoming week, which began on Monday September 14th. Ms. Cevelo said that the schedule for the week beginning September 14th was completed and Mr. Ijanusi was on the schedule and expected to return to work on September 16th (Ms. Cevelo was not looking at records during our conversation and speaking from memory, so the exact return date may not be accurate. But this was her memory during our meeting). Ms. Cevelo stated that after the schedule was produced and the work week was approaching, they were notified by Mr. Ijanusi that he would be taking another week off before he was going to return to work. Ms. Cevelo said that Mr. Ijanusi did not request this time off, but rather he simply informed them that he would be taking a third week off. She said that such a late request for time off is not in compliance with their policies, nor is it appropriate for staff to simply notify them that they are taking time off but rather they must first



request this time off and then wait to see if this request is approved. She also alluded to staffing issues that occur when an employee leaves work for three weeks, which affect the operation of the business as well as the scheduling of other employees who will need to fill in on assignments that they were not expecting to need to cover. Ms. Cevalo also particularly noted that an employee who has only worked for the company for five weeks is not entitled to take three weeks off. She said that members of her supervisory staff contacted Mr. Ijanusi, but they had difficulty getting him to respond to their messages. His lack of communication concerned them, combined with his failing to follow policy regarding time off requests. She said that they scheduled a meeting to discuss these issues and the company was going to undertake an investigation into potential policy violations regarding this matter, and they sent a message to Mr. Ijanusi telling him to appear for this meeting. She said that Mr. Ijanusi did not show up for this meeting. As a result of this, Mr. Ijanusi was placed on administrative leave and sent a formal letter advising him of this. Mr. Ijanusi never worked for the company again, although he was not officially terminated at this time. She said the following month they needed to revoke Mr. Ijanusi's access and notify the Cannabis Control Commission of this revocation. During this process it is required that they answer whether or not the employee has been terminated, and she said that this was the first time they had officially considered Mr. Ijanusi terminated. I explained to Ms. Cevalo that it has been claimed that the reason Mr. Ijanusi no longer works for Sanctuary was because of the findings of Lieutenant Cullinane's report, to which Ms. Cevalo responded by that this had nothing to do with it.

There is one other item that arose during the course of this investigation that I believe should be mentioned. I did not investigate this matter as it is beyond the scope of my role here, which was to investigate the actions of Lieutenant Cullinane. During my conversation with Ms. Cevalo, she expressed some concern regarding the actions of Donelle O'Neal. Mr. O'Neal is a Town Meeting Member and a member of the Advisory Committee. As such he has the ability to influence both policy and funding within the town. Ms. Cevalo said that Mr. O'Neal has injected himself into Sanctuary's business in a way that she believes is not proper. Ms. Cevalo stated that Mr. O'Neal has involved himself in their business since their opening, and said that he sent them a number of people who he wanted Sanctuary to hire for employment. She said that the company hired each of the people that Mr. O'Neal sent to them. She expressed that she is aware that given the nature of marijuana, they are aware that their business is under a microscope, and as such they endeavor to go above and beyond to do whatever they can to work well in the community. This also involves taking action if there are areas where they fall short in the performance of any of their responsibilities. Ms. Cevalo informed me that one of the employees sent to Sanctuary by Mr. O'Neal had done something that was not in compliance with their policies (she did not specify what this was, and I did not inquire). As a result of this, the employee was spoken to and issued a reprimand. Ms. Cevalo stated that at some point over the next few days she received a message from Mr. O'Neal directing her that she should remove this reprimand from the employee's file. Ms. Cevalo was surprised to receive a message like this and informed me that she did not think something like this is appropriate. She stated that she does not report to Mr. O'Neal, and appeared frustrated that someone from the outside would be trying to impose upon them how to run this private business. Mr. O'Neal has also spoken publicly and requested the Select Board to get involved in this case. In addition to this, as part of my investigation I requested emails from Lieutenant Cullinane related to this case. I received a number of emails, including one email chain that contained a message from Donelle O'Neal to Lieutenant Cullinane. In this exchange, Mr. O'Neal appeared to be questioning why Lieutenant Cullinane had not forwarded a copy of the Sanctuary security video footage to him to review. The exact text of this email is as follows:



From: Donelle O'Neal <donelle617@gmail.com>
Sent: Tuesday, September 22, 2020 9:10 PM
To: Paul Cullinane <pcullinane@brooklinema.gov>
Subject: Fwd: CMAC Meeting Materials: Tuesday 9/21/2020
*Too many blind spots. Why didn't you send this to me?
Now I'd like to see the full video footage.
I've known you a long time.
~Donelle S. O'Neal Sr.*

Mr. O'Neal was not present for anything related to this case. He is not a witness and had no connection with the investigation. He seems to have a strong opinion as to how this case should be resolved, but to my knowledge has not seen the evidence. The questioning of a police lieutenant as to why he has not shared with him, a private citizen, this security footage, is confusing. This footage does not belong to Lieutenant Cullinane, and the sharing of this security footage to anyone who is not a necessary party to the case without permission would be inappropriate. There are some very good reasons why a private company like Sanctuary may not want it publicly known how their security system works and what camera angles their system provides. It is well known that the marijuana industry involves large amounts of cash, more so than other businesses. Safety and security are a very real concern in this industry. Lieutenant Cullinane declined to produce a copy of the security video to Mr. O'Neal. This was the correct decision. There is a particular awkwardness regarding a request like this by Mr. O'Neal, who is on the Advisory Committee's Public Safety Subcommittee that makes recommendations regarding the police department budget and funding. Mr. O'Neal has been involved in the community for many years and I do not know what his motive is here, beyond the fact that he has made it clear that Mr. Ijanusi is a neighbor of his and that he wants to help him. I am including these facts in this paragraph because I had concerns that if I did not include them in my report after learning this information, that it may appear to some that I was intentionally withholding this information.

On December 31, 2020 I received an email from Mr. O'Neal. The email was brief and he requested that I call him. I believed that Mr. O'Neal may be calling to assist with scheduling an interview with Mr. Ijanusi (Mr. Ijanusi had mentioned in his email that he would like Mr. O'Neal included) and I called him at approximately 5:30 PM. Based on our conversation it appeared that Mr. O'Neal has been in contact with Mr. Ijanusi regarding the case but he was not calling to set up an appointment for me to speak with him. I am aware that Mr. O'Neal has echoed the claims by Mr. Ijanusi regarding Lieutenant Cullinane and dishonesty and so I attempted to get clarification from him as to what specifically was being alleged as untruthful regarding Lieutenant Cullinane's report. Mr. O'Neal went on to claim that the failure to include the time stamp on the photos was one example, and he reiterated what is also alleged by Mr. Ijanusi with regard to the CCC regulations requiring that video security footage be date/time stamped. I explained to Mr. O'Neal that in this case Sanctuary is meeting that requirement, and that there is nothing in those regulations that would apply to Lieutenant Cullinane's use of a screenshot in a police report. Mr. O'Neal did not appear to accept this. I asked him numerous times if there was something in the report submitted by Lieutenant Cullinane that was untrue, to which he did not respond to directly but rather mentioned items that are not in Lieutenant Cullinane's report (he mentioned a security log and suggested that some information was not being disclosed to the town, and also wanted to discuss the issue of detail officers not being hired and how this impacted the host community



agreement). I explained to Mr. O’Neal several times that my role in this matter is to investigate the allegations that Lieutenant Cullinane lied in his report, and that I am not looking into the host agreement or whether or not there are detail officers being hired or if there is a need for detail officers at this location. Mr. O’Neal was of the opinion that this case is bigger than just what I was looking into. I explained again my role and what I was investigating. I explained that I was having difficulty in locating any lies in the report submitted by Lieutenant Cullinane and pointed out that as I was speaking with him, I was having difficulty getting him to point out any lies in the report as well. At one point during the conversation (when I expressed to Mr. O’Neal that I was having trouble locating any lies as alleged in this case), he suggested that I was not investigating with integrity by saying, “yeah, that’s about what I expected from you.” To my knowledge Mr. O’Neal has never had any connection with an internal affairs matter that I have investigated and has no direct knowledge of my work. During this conversation I did explain to Mr. O’Neal that the reason for the timestamp not being on the photos was that Lieutenant Cullinane had zoomed in on the photo and mistakenly cropped out the timestamp. I informed him that this appeared to be inadvertent, and asked him if he believed there was anything deceptive or misleading in the photo that was facilitated by the missing timestamp. Mr. O’Neal questioned that this was accurate and pointed out that it had been months since the incident had occurred and if this truly was the explanation asked why he only learning of this now? I informed Mr. O’Neal that just because the information had not been explained to him personally (Mr. O’Neal) prior to this conversation, does not mean that Lieutenant Cullinane had not reported this information through the proper channels when the issue was raised.

Early on in the above conversation with Mr. O’Neal, he reminded me that he is both on the Advisory Committee and the Public Safety Subcommittee of the Advisory Committee. Mr. O’Neal knows I am already aware of this fact as this is something he had told me in a prior conversation. The context of mentioning the statement about being on the Public Safety Subcommittee involved the issue of the presence of police details at Sanctuary and he told me that as a member of the subcommittee it is his role to make sure that he oversees what is going on. It was very clear that there were aspects of the Sanctuary operation that he did not agree with, and he suggested at one point that David Kimmel may have intervened in the documenting of an internal security log by directing Mr. Ijanusi not to log the August 31st incident that led to this investigation. He originally accused both Lieutenant Cullinane and Mr. Kimmel of doing this, to which I reminded him that Lieutenant Cullinane has no role in the internal security logs at Sanctuary and who fills them out. Mr. O’Neal offered no evidence of involvement by Lieutenant Cullinane, and on three separate occasions during our conversation I specifically mentioned this accusation to Mr. O’Neal, at which point he retracted the allegation. The security logs are a log that is maintained by Sanctuary security personnel. It is a log of any incidents that they deem suspicious or otherwise worthy of note. During my conversation with Ms. Cevelo, she had noted that this log had not been filled out properly on August 31st, and informed me that it was Mr. Ijanusi who had been responsible for filling it out, and that he had neglected to do so. She said that the manager on duty had been spoken to about this failure by Mr. Ijanusi, because as the manager he should have made sure that Mr. Ijanusi had followed the proper procedure. There is no evidence to suggest that Lieutenant Cullinane was present for any of this or had any connection with the log not being filled pursuant to Sanctuary policy. There was also no evidence provided that Mr. Kimmel was either present at Sanctuary on this day (he does not work at the Brookline location) or had anything to do with this. In addition to this allegation against Mr. Kimmel, Mr. O’Neal made other allegations that Sanctuary is not meeting their obligations to the town, and further claimed that Lieutenant



Cullinane is covering for them. Similar to the allegation that Lieutenant Cullinane “lied” in his report, I am unable to ascertain exactly what it is that Lieutenant Cullinane is accused of doing that is “covering up” for Sanctuary Medicinals. When it became clear that I did not see evidence to support some of the generalized claims being made by Mr. O’Neal, he abruptly (but politely) terminated the call.

I have been a Brookline Police Officer for more than 22 years, and I have been assigned to the Office of Professional Responsibility for almost 10 years (June 2021 will complete my 10th year). During those ten years I have investigated a number of cases that were high profile and in the public eye. I have also investigated cases that have been unknown publicly but known within Town Hall. Throughout those years, I have never had a member of the Advisory Committee (or Public Safety Subcommittee) contact me during an active investigation and attempt to convince me of what the evidence in the case shows. As I noted above in my report, Mr. O’Neal is not a witness to any of the events of this case. Yet during my discussion with Mr. O’Neal, it was made very clear to me what he thinks of the evidence and how he thinks this investigation should turn out (despite his acknowledging that he has not seen the video of the incident). I advised Mr. O’Neal simply that my report would reflect the truth. During our conversation Mr. O’Neal made no statement to me that there would be any negative consequences for me personally if my investigation did not come out the way he wanted, nor did he suggest that it would affect his position related to budget items involving the police department. But his statement that he was becoming involved in this case because of his role in local government is not something that rang fully true to me. And in my opinion his attempt to inject himself into an active investigation and sway the outcome as he has done here is not appropriate.

Prior to the conclusion of my phone call with Mr. O’Neal I expressed to him that it would be helpful for me to be able to interview Mr. Ijanusi so I could understand the specifics of his allegations. Mr. O’Neal told me that he and Mr. Ijanusi had spoken and that I should expect an email from soon. As of the time of this report, Mr. Ijanusi has made no further contact with me.

Conclusion

The evidence does not support a finding of misconduct by Lieutenant Cullinane in his handling of this case. Allegations that he lied in his investigation appear to be without merit. There is also no evidence to support the claim that Lieutenant Cullinane is friends with anyone from Sanctuary, or that a friendly relationship may have somehow affected the direction of his investigation. Although Mr. Ijanusi has made this allegation in one of his emails, he has offered no facts and made no attempt to substantiate this claim. As I wrote above, I have tried to get Mr. Ijanusi to participate in this process in the hopes that he might provide me with some specifics regarding his allegations. As also noted above he was not willing to speak with me, nor did he provide any additional information over email.

A copy of this report will be retained in my office. I recommend the matter be closed.

Update:

On January 4, 2021 at 6:03 PM I received an email from Mr. Ijanusi. At the time the email was received, the above report had been written and submitted to Superintendent Morgan. The new email contained additional information as well as new allegations against Lieutenant Cullinane.



The email also included a copy of a September 17, 2020 report by Lieutenant Cullinane to Superintendent Morgan, which described three issues at Sanctuary Medicinals. The email by Mr. Ijanusi alleges improprieties related to this September 17th report by Lieutenant Cullinane, and also reiterates the allegations made regarding the August 31st incident discussed above. He also identifies some specific items the September 14th report that he alleges are lies by Lieutenant Cullinane. Some of these allegations are already addressed above, while others are new allegations. The full email is a little more than 2 pages long and as such it does not make sense to include the entire message here. The email has been added to the file. The email begins by making several allegations regarding the September 17th report.

The first allegation is that Lieutenant Cullinane improperly described two incidents in his September 17th report as “sales transaction errors” when in fact Mr. Ijanusi states that one of the incidents was an actual theft of products by a customer. The email states that the customer grabbed the bag of product and was told that his payment had been declined, and he then said “fuck you” to the sales lead and walked out the door with the product. Mr. Ijanusi’s allegation relates to the description of this incident in Lieutenant Cullinane’s report. Mr. Ijanusi writes, “saying that theft which is a major incident report under MA CCC regulation was a sale error is a lie. Saying that no CMR violation occurred in this case is a lie and a violation of CMR in itself...”

I reviewed Lieutenant Cullinane’s report on this matter. Mr. Ijanusi has been selective in what he chose to point out from Lieutenant Cullinane’s report. The report identifies “Sales Transaction/Errors” and points out that a policy was not followed, but the report also specifically identifies that this failure resulted in a customer leaving without paying. The exact language from the report states:

Sales Transaction/Errors-On August 4, and August 5, 2020, Sanctuary Sales Representatives failed to follow their internal policy regarding the sale of products to customers. On both occasions, Sales Representatives transferred the products to customers prior to the debit card transactions being completed. This resulted in customers leaving the dispensary without payment being made.

I spoke with Lieutenant Cullinane regarding the case referenced by Mr. Ijanusi, particularly regarding the listing of this issue as a sales error. The incident involved a man who made a purchase and provided a debit/credit card for payment. The product was provided to the man, and after the man had the product in his possession it was realized that the payment had not processed properly. Sanctuary employees spoke with the man and advised him of this, but the man was not willing to submit his card again, claiming that he believed he would be double charged. The man then left with the product. Lieutenant Cullinane said that Sanctuary is not supposed to produce the product to the customer until after payment has been made. For that reason, Lieutenant Cullinane included in his report that their internal policy had not been followed, and that this had allowed the incident to occur. There was no attempt to hide this incident, and in fact Lieutenant Cullinane specifically stated in his report that the man left without payment being made.

The second allegation related to the September 17th report by Lieutenant Cullinane relates to “public consumption” Mr. Ijanusi claims that Lieutenant Cullinane stated in his report that there was only one incident of public consumption at Sanctuary Medicinal. The claim is that there were other issues of public consumption, and specifically notes a Sanctuary security log entry from



August 20, 2020 that lists a case of “public consumption” (no further details provided on this incident in the log). Mr. Ijanusi also notes that there is an entry dated August 24, 2020 which references a prior issue with public consumption, although the details of that prior incident are not specified. Mr. Ijanusi writes that Lieutenant Cullinane, “stating that it only happened once is a LIE.” He goes on to quote Lieutenant Cullinane’s report, “Sanctuary Security should have called Police when the alleged illegal activity was suspected instead of making directed [sic] contact with the individual-as stated in Business Plan [or wherever].” Mr. Ijanusi goes on to write that Lieutenant Cullinane, “never stated the security who happens to be white, failed to call the cops and violated company like he did he my report. Only further shows his discrimination against and targeting of me.

I have reviewed the report referenced by Mr. Ijanusi. Nowhere in this report does Lieutenant Cullinane state that issues of public consumption happened “only once” as Mr. Ijanusi claims. Lieutenant Cullinane wrote in his report that he was reporting on some issues that had arisen since Sanctuary Medicinals had opened, and specified that he was reporting on, “three issues in particular.” Lieutenant Cullinane did not claim that his report was an all-inclusive list of everything that had occurred at Sanctuary, nor does he submit reports on every single incident that occurs at Sanctuary. Mr. Ijanusi’s allegation that Lieutenant Cullinane “stated that it only happened once” is unsupported and appears to be untrue. In his email Mr. Ijanusi also alleged that Lieutenant Cullinane didn’t report that security failed to call the police, and further claims that this shows “discrimination” and “targeting” of Mr. Ijanusi by Lieutenant Cullinane. This claim by Mr. Ijanusi is confusing. In his own email Mr. Ijanusi specifically quotes Lieutenant Cullinane’s report as stating, “Sanctuary Security should have called the police” in regard to this incident. The allegation that Lieutenant Cullinane failed to report that security didn’t call the police is simply untrue. The language in Lieutenant Cullinane’s September 17th report is similar to his September 14th report involving Mr. Ijanusi, where he wrote “it appears that Security Staff failed to follow a policy outlined in the Business Plan, which technically could be a violation of the Host Community Agreement.” He then went on to write, “if the plan was adhered to and the police were called, this entire matter may have been resolved in a more timely fashion.” In both cases, Lieutenant Cullinane reported that Sanctuary staff should have called the police. It is unclear to me why Mr. Ijanusi alleges that this did not happen.

Mr. Ijanusi also makes a number of claims about the operations of Sanctuary Medicinals. He reports that a customer was allowed access to Sanctuary using a digital ID on his phone, and he also states that he (Mr. Ijanusi) did not have a proper Cannabis Control Commission registration card while he was employed at Sanctuary. Mr. Ijanusi says that there was a safety and locks violation involving the rear door at Sanctuary, and further reports that customers have been seen opening bags on premises, which he states is a violation of 935 CMR 500 (Note: I do not believe this is an accurate understanding of the law. All marijuana products are individually sealed in child-proof packaging and then placed in a brown paper bag for the customer to carry the merchandise out of the store. I am unable to locate anything in 935 CMR 500 that makes it unlawful to open the brown paper bag to view the sealed contents inside). These are items that would be more properly before the Cannabis Control Commission as opposed to Lieutenant Cullinane. For example it is not part of Lieutenant Cullinane’s duties to do building checks at Sanctuary and inspect the locks on their doors, nor is he the person responsible to issue and/or verify the individual ID cards for all of the staff at Sanctuary. If Mr. Ijanusi believes there are violations such as this, he may report them to the Cannabis Control Commission for their review.



Mr. Ijanusi also reports that a marijuana sale was made after 8 PM, which would be a licensing violation as Sanctuary is licensed to sell marijuana only up until 8 PM. I interviewed Lieutenant Cullinane regarding this. The incident occurred on August 10, 2020, although Lieutenant Cullinane was not aware of this at that time. The matter was ultimately brought to his attention after Chief Diversity Officer Lloyd Gellineau forwarded an email to Superintendent Morgan about this incident. The email from CDO Gellineau was an email thread which included a message from Mr. Ijanusi (dated December 15, 2020) where he mentioned the August 10th incident and also asked that the Sanctuary Medicinals license to operate not be renewed. Upon receiving this email from CDO Gellineau, Superintendent Morgan forwarded the matter to Lieutenant Cullinane for investigation. Lieutenant Cullinane's investigation showed that a woman was inside the store and being waited on at the cash register at 7:57:38 PM, however her transaction was not completed until 8:01 PM. She then left the store. Lieutenant Cullinane also reported that the woman had entered the dispensary at 7:56 PM, and noted that the license through the town states that customers are not to enter the premises beginning 15 minutes before the closing hour. Lieutenant Cullinane documented these items in a report and submitted it to Superintendent Morgan for review and also the Town Planning Department for whatever action they deem appropriate. In his email Mr. Ijanusi suggests that Lieutenant Cullinane did not report this matter as part of a cover-up. There is no evidence to support this.

Mr. Ijanusi has raised the issue of the absence of a police detail on a day in late August. He raises the procedural issue that he wishes to know why there was no police detail assigned, and states that police details may not be cancelled unless a written request is sent to the Town Administrator and that there must be at least two weeks prior notice. Mr. Ijanusi appears to be referring to the Host Community Agreement, which states that the company shall have a police officer on-site to direct traffic in and out of the premises. The agreement goes on to say that the company may, with a minimum of two weeks' notice, apply to waive this requirement, and that this may be waived by the Chief of Police or his designee after review of traffic operations at the site. In this particular case, Sanctuary made no request to eliminate the police detail. Lieutenant Cullinane observed over a period of several weeks that foot traffic was very low at Sanctuary. He said that Sanctuary is capable of servicing 210 orders per hour under Covid-19 conditions, but that actual volume had been averaging 300 or fewer orders per day (customer volume less than 15% of capacity). Based on this and his personal observations it was his opinion that a police detail was not necessary. He also noted that there were traffic details around Brookline that were going unfilled, while a detail officer was being hired to work at Sanctuary at a location where they were not needed. He contacted Maria Morelli from the Planning Department and they discussed this, and he advised her that he did not believe a detail officer was necessary at this location given their current customer volume. Ms. Morelli advised him that she believed the police department could make that decision if they felt public safety did not require a police detail. Lieutenant Cullinane brought this issue to Superintendent Morgan and they considered the need to continue a police detail at Sanctuary. In their analysis of this issue they considered the fact that there was a separate police detail assigned nearby, so in the event of an incident an officer would be able to respond quickly to the area. Based on the evaluation of the above data, the decision was made that a detail officer at Sanctuary Medicinals was not necessary. The police detail assignment has since been restored, and a detail officer remains assigned to Sanctuary as of the time of this report.

In Mr. Ijanusi's email he makes two additional claims that Lieutenant Cullinane included lies in one of his reports. He claims that Lieutenant Cullinane lied when he took statements from two



management staff members at Sanctuary and included them in his report. In this instance, Mr. Ijanusi does not claim that Lieutenant Cullinane was the one who lied, but rather alleges that the statements as given to Lieutenant Cullinane were not true. It seems to be his position that because other witnesses gave statements that Mr. Ijanusi disputes, that the decision by Lieutenant Cullinane to include these interviews in his report constitutes a lie on the part of Lieutenant Cullinane. This is simply untrue. This is not an allegation that Lieutenant Cullinane made false statements. Further, there is no evidence that the statements given to Lieutenant Cullinane are false. There is also no evidence that Lieutenant Cullinane had any reason to believe that either of these statements were false. This is not a bona fide allegation of lying by Lieutenant Cullinane being made by Mr. Ijanusi.

Upon receiving a formal complaint from Mr. Ijanusi on this matter, I made an additional request to interview him. Mr. Ijanusi did not respond to my request.

Conclusion

The evidence does not support a finding of misconduct against Lieutenant Cullinane related to any of the allegations. The complaint has been documented. I recommend the matter be closed.

Allegation: Untruthfulness
Complaint Classification: Class A
Recommended Finding: Unfounded

Allegation: Bias Based Policing
Complaint Classification: Class A
Recommended Finding: Unfounded

Allegation: Unsatisfactory Job Performance
Complaint Classification: Class B
Recommended Finding: Unfounded

Respectfully submitted,



Lieutenant Paul Campbell
Office of Professional Responsibility

