

PSU COMPLAINT

Complainant: Tamika Palmer
Date of Birth: 9/11/76
Address: P.O. Box 161538
Louisville, KY 40256
Email: tpalm0911@yahoo.com
Location: Louisville
Date: January, February & March 2020
Involved: Mike Campbell
Description: See below

To the LMPD Professional Standard Unit,

I am initiating a complaint against officer Michael Campbell in relation to his conduct associated with the death of my daughter, Breonna Taylor, and the surrounding investigation. The basis for my Complaint, along with the standards which were violated, are described herein.

INTRODUCTION

Mike Campbell, in early 2020, was a member of Place Based Investigation squad. He was also present at Breonna's home when she was killed. He engaged in several actions which were in violation of LMPD policies and procedures. These included, but were not limited to, participating in obtaining a search warrant which he knew contained materially false information; failing to activate his body camera or otherwise turn in body camera footage; tampering with an active crime scene; performing deficient surveillance; failing to separate himself from others at the scene of an officer involved shooting; actively engaging in the canvassing of a crime scene in which he was a participant in the events surrounding the homicide; knowingly providing untruthful information to

investigators; failing to provide material information regarding officer conduct in unlawful use of force and crime scene tampering.

Officer Campbell's actions and omissions were reckless, deliberate and in complete disregard for the rights and safety of citizens, the code of ethics and integrity and the rules promulgated by your department to assure that policing is performed in a manner that prioritizes human life.

BACKGROUND

In January of 2020, Mike Campbell was on the Place Based Investigation squad. He was directly involved in the investigation into 2424 Elliott Avenue, Jamarcus Glover, Adrian Walker and the alleged drug dealing associated with the three.

The search warrants obtained by PBI were collective efforts of each member of the squad, including Campbell. On February 17, 2020 a search warrant was obtained by PBI. The warrant authorized GPS tracking, a pen register, text messaging records, call history cell tower locations and detailed subscriber information from Sprint.¹ The warrant was in relation to cell phone number 502-457-4235. As probable cause for the warrant, PBI asserted that this was Jamarcus Glover's number, despite no corroboration through a confidential informant or even by simply having someone call the number to confirm it was his. Instead, the squad asserted that Jamarcus Glover had made an in-person Complaint to LMPD on February 15 regarding a vehicle which was impounded and searched, and that Glover reported his number to be 502-457-4235. The squad produced no record of this Complaint.

¹ Sprint Warrant

In actuality, the number on the February 17 warrant belonged to my daughter. This was the number to her personal cell phone. Calling the number would have confirmed it. These detectives knew or should have known that this was her number. The detectives knew it was registered to her:

“502-457-4235 is registered to a Breonna Taylor of 3003 Springfield Drive #4 of Louisville, Ky. Affiant has received information that Breanna Taylor may be the suspected girlfriend of Jamarcus Glover. Affiant realizes that it is not uncommon for drug traffickers to use phone numbers under different names to avoid detection from law enforcement.”

These detectives do not identify any basis for stating that my daughter was the girlfriend of Jamarcus Glover. The reality is that the two were not even speaking at this time. They were not speaking at all, let alone dating, from a date prior to this until the time she was killed.

PBI also made the following knowingly false statement in the February 17 search warrant affidavit:

“Affiant verified through a US Postal inspector that Jamarcus Glover has been receiving packages at 3003 Springfield Drive #4.”

This assertion is this statement was completely false and the same was made aware to PBI. As a result of the warrant, PBI was able to perform tracking of Breonna’s communications and locations. This was never reflected within the case file, likely due to the fact that Breonna (and her phone) would have been consistently located at her place of employment and her home on Springfield Drive. Communications with Jamarcus Glover were non-existent between obtaining this warrant and Breonna’s death; the two were not in a relationship and the Sprint phone records for Breonna’s phone confirm that there were no communications between the two on the phone.

On February 21, 2020 PBI obtained another search warrant in relation to what they identified as Jamarcus Glover’s phone.² They went to a new judge, obtaining a warrant to track a

² February 21 warrant

different phone number. In the affidavit for this warrant, unlike the one for Breonna's phone, the detectives stated that they had a confidential informant call the number and confirm it belonged to Jamarcus Glover. The fact that these detectives sought a new warrant for a new number of Jamarcus Glover merely four days after obtaining a warrant for Breonna's phone (stating that it was Jamarcus's) calls the integrity of the February 17 warrant into question.

PBI had no basis or probable cause to obtain a warrant to track my daughter's phone. This was an invasion of her privacy, was unlawful and, at a minimum, should have been revoked on February 21 when it became obvious to detectives that Jamarcus had a different phone. Instead, it appears that PBI continued to monitor her unlawfully up until the time she was killed.

There are no records indicating that, at any time prior to when Breonna was killed by police officers, PBI advised the Court issuing the warrant that they had erred in identifying 502-457-4235 in the February 17 affidavit as Jamarcus Glover's phone number. There are no records indicating that PBI had the warrant rescinded, or otherwise stopped tracking Breonna's phone, prior to her death.

In tracking the phone, it should have been obvious that Breonna was located at work full-time and that she was neither present with Jamarcus nor speaking with him. Breonna's location should have also confirmed that she and Jamarcus were not together at all from the time of the February warrant until the time she was killed. However, PBI advised a judge and fellow LMPD members in March 2020 that Breonna was suspected to be Jamarcus Glover's girlfriend, that she was suspected to be holding drugs and money for Jamarcus Glover and that Jamarcus Glover was believed to sleep at Breonna's at night. PBI did not advise the judge and fellow LMPD members that Breonna's phone had been tracked and confirmed that she was not communicating with

Glover, that Glover was not staying with her and that there was nothing to suggest that Glover was storing money or drugs with her.

Leading up to March 12, PBI drafted at least six no-knock search warrants, which initially intended to execute simultaneously, as part of their investigation into Jamarcus Glover.³ Three of the six warrants were for neighboring properties on Elliott Ave. These properties were identified as a suspected trap house and two vacant adjacent properties where narcotics, firearms and/or money could be stored. The fourth warrant was for another suspected trap house, which was a property around the corner on Muhammad Ali. Blvd. The fifth warrant was for a residence on Cathe Dykstra Way, which is approximately 5 miles from Elliott Ave.⁴ This residence belonged to Kiera Bradley, who PBI knew is the mother of Jamarcus Glover's daughter. PBI had actually identified Bradley as an additional target of the investigation in early February, citing her as a "drug trafficker" who was being investigated for both trafficking and money laundering.⁵ Within the draft of the warrant for Bradley's residence, the detectives stated:

*"3414 Cathe Dykstra is the **main residence for Jamarcus Glover** and (he) does not claim this as his residence in order to avoid detection from law enforcement. Affiant believes that Mr. Glover might keep narcotics and/or proceeds from narcotics for safe keeping at this location."*⁶

The sixth warrant was for Breonna's home on Springfield Dr., which was ten miles away in the southern end of Louisville. PBI, despite knowing that Glover stayed at Cathe Dykstra, proceeded to advise other CID members and SWAT members that Glover "laid his head" at Breonna's home. This was blatantly untrue. Furthermore, PBI did not proceed with obtaining a

³ Email to SWAT with search warrant drafts

⁴ Draft warrant for Cathe Dykstra

⁵ Grand jury subpoena for Bradley's bank records

⁶ Notably, the same detectives swearing to the truth of the information in this draft warrant also advised that they believed Jamarcus resided at Breonna's home and kept narcotics and cash at Breonna's home.

warrant for Cathe Dykstra, despite detectives actually confirming that Glover stayed there as his primary residence leading up to March 12, 2020. This was never conveyed to many of the CID members on March 12, who were never advised that Bradley, rather than Breonna, was identified by PBI as a drug trafficker, money launderer and central to Jamarcus Glover's operation.

It certainly appears as if PBI was able to get Bradley to cooperate with the investigation into Glover, and in turn remove her as a target of search warrants. It appears that PBI ignored evidence from Breonna's cell phone showing no relationship to the investigation, and instead relied upon self-serving statements of Bradley to implicate Breonna without any legitimate basis for the same,

When SWAT members reviewed PBI's plans and draft search warrants, they rejected them. SWAT members recognized that simultaneous search warrants are unsafe and that the risks associated with the numerous warrants outweighed any benefits. SWAT members left the meeting with an understanding that the individual warrants would be executed on a series of different nights, beginning with the Elliott Ave. addresses.

On March 12, PBI proceeded with obtaining the no-knock search warrants for Elliott Ave., W. Muhammad Ali Blvd. and Springfield (Breonna's home). Meanwhile, the transcripts for PBI detectives also indicate that they obtained their spring firearms qualifications on the same date. This appears to be blatantly false.

Like the warrant for Breonna's cell phone, the affidavit presented to obtain the search warrant for Breonna's home was knowingly falsified. Like the cell phone warrant, it alleged as the basis for probable cause that a US Postal Inspector verified Jamarcus Glover was receiving packages at the address.⁷ Following Breonna's death, the postal inspector steadfastly denied the

⁷ Search Warrant

sworn assertion in the search warrant affidavit. Furthermore, Shively Police detectives have since confirmed that at least two of the officers who participated in raiding Breonna's home, John Mattingly and Mike Nobles, were specifically advised in January and February that no packages addressed to the target were going to Breonna's home.⁸ It appears that Campbell, Mattingly and Nobles all knew on March 12 that they were assigned to raid a home under the guise of a search warrant which had been knowingly falsified. Despite this, Campbell did nothing to stop it.

It is unclear why detectives did not proceed with obtaining a search warrant for Cathe Dykstra, yet continued to obtain one for Breonna's. Jamarcus was living on Cathe Dykstra and was physically present at Cathe Dykstra on March 12. Meanwhile, Breonna had not seen or spoken with Jamarcus within the month leading up to her death. Campbell knew this and did nothing to reconcile this issue.

Campbell knew that a no-knock warrant mandated execution by SWAT. Despite this, Campbell's squad obtained a no-knock warrant for Breonna's home without ever advising SWAT. On March 12, SWAT was never advised that a no-knock search warrant had been requested and obtained for Breonna's home.⁹

On the evening of March 12, Campbell was allegedly the VO for the Springfield warrant. His surveillance, however, was incredibly wrong. He failed to identify the presence of Kenneth Walker at Breonna's. He failed to provide the officers with a proper configuration of the home. In fact, the officers on scene were unaware of whether there were exists to Breonna's home well after Breonna was killed. Officers on scene even believed that the patio door to Apartment 3 (Breonna lived in Apartment 4) was actually a part of Breonna's home.

⁸ Excerpts of interviews from Mike Kuzma and Tony Salyers

⁹ Interviews of SWAT members Massey, Casse and Burns

To this date, nobody has identified who the Lead Detective was assigned to Springfield. However, it was perhaps Campbell, given that it was a PBI investigation and he was the only PBI member identified at Springfield. Meany called for the EMS staging at Springfield, but he apparently was not on scene for the warrant execution.

Campbell's account of the events leading up to the warrant execution are off base and demonstrate a complete lack of knowledge of the surrounding, larger scale investigation. Campbell specifically states in his interview that he believed Breonna Taylor and Jamarcus Glover were at her home together. If this is truly the case, then he was oblivious to radio communications which set forth that Glover was identified across town an hour prior and that he was specifically identified at Elliott Ave. prior to Springfield being raided. Jamarcus was confirmed to be leaving Kiera Bradley's on March 12. CID members specifically observed Jamarcus arrive at Elliott well prior to the time that Breonna's home was raided. If Campbell was never made aware of this information, then it was due to Meany's failure to coordinate the operation. If part of the reason Breonna's home was raided was due to the belief of Campbell that Jamarcus was in the home, then this was a complete lack of competence.

One constant with the PBI squad is their usage of body cameras. Citations confirm that the squad always activates their body cameras during law enforcement actions, including residential search warrants. On March 12/13, documents confirm that PBI members activated their body cameras at Elliott. Dozens of documents confirm that they activated their cameras on prior interactions associated with this investigation as well. Despite this, Campbell claims that he did not have a body camera on March 12/13 while at Breonna's. This is either a blatant violation of policy, or it is dishonest. An audit trail of Campbell's camera should be obtained and it should be identified whether he had recorded footage on March 12/13 and, if not, who authorized him to

proceed without a body camera. Given that Campbell was performing surveillance, it should also be determined what technology was utilized and whether it included video recording. According to CID SOP's, 'prior to serving the search warrant, the lead detective may request assistance from the Technical Operations Team with videotaping the location, **unless exigent circumstances exist.**' **No exigent circumstances have been identified by Campbell or others as to why there would not have been videotaping of Breonna's.**

Following the shooting and the apprehension of Kenneth Walker, Campbell does not separate himself from those who were involved or from the scene. There were nearly a hundred officers on scene who were not involved, yet Campbell proceeds to canvass for neighbors, speak with other involved officers and walk throughout the crime scene. As a veteran officer, Campbell knew this was not permitted and that it was a gross violation of policies.

Campbell, when turning in his firearm for round counts, did not have a full magazine in addition to a round in the chamber. This is incredibly uncommon for officers, nearly all of whom will tell you that they begin with a full mag plus one in the chamber.

Campbell's statement to PIU also contains knowingly false information. He states that multiple gunshots come at them from inside the apartment. This is completely false. When asked to specify how many shots came from inside, he states:

It was just a lot of gunfire. I can't give you a number for sure. It seemed like more than five gunshots I heard. It was a lot of gunfire and I'm sure some of it was returning fire, so I couldn't determine the difference.

As the door popped open rounds were coming through.

Campbell gives a version of the events which completely omitted that he and other officers fell to the ground over each other. This was a material omission. And Campbell specifically states:

It was Breonna Taylor and Jamarcus Glover, I believe, were supposed to be in the apartment.

This is either a blatant lie, or a complete disregard for the facts of the investigation. Untruthfulness or gross incompetence. Campbell had been assigned to watch Breonna's apartment for more than two hours prior to the raid. Glover had been identified. But if Campbell was operating under the belief that Glover was at Breonna's, then he is responsible for the actions taken in proceeding with that warrant and the way it was handled.

CONCLUSION

The actions and inactions of Mike Campbell are unacceptable, intolerable and contributing factors to Breonna's death and the deficient investigation thereafter. LMPD should sustain these substantial violations of policy and impose severe consequences.

Respectfully Submitted,

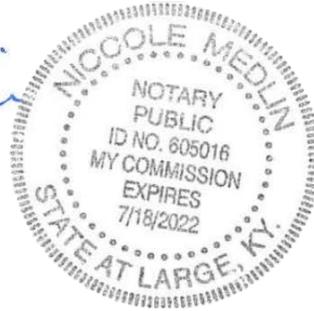
Tamika Palmer

Tamika Palmer

Date: March 8, 2021

Witness Signature: *Louise Baker*

Notary: *Nicole Medlin*



VIOLATIONS (NON-EXHAUSTIVE)

5.1.5 TRUTHFULNESS/UNTRUTHFULNESS

Members are required to be honest and truthful in all matters related to their scope of employment and operations of the department. Untruthfulness is prohibited and may warrant termination. This includes

- Making a false, misleading, or untrue oral or written statement, report, record, and/or communication
- Failing to accurately report all facts pertaining to an investigation;

8.1 SEARCH WARRANTS

An affidavit supporting the application for a search warrant is required. The accuracy of the affidavit is vital to the validity of the search warrant; therefore, officers should verify that the information is as complete, accurate, and specific as possible.

3.9.1 COMMUNICATIONS POLICY

It is the policy of the Louisville Metro Police Department (LMPD) to support continuous communication, coordination, and cooperation between all levels of the department. This may be accomplished through either oral or written types of communication. Communication flows both upward, and downward, through the appropriate chain of command, and laterally between bureaus, divisions, sections, units, platoons, officers, and other personnel.

4.31 WEARABLE VIDEO SYSTEM (WVS)/BODY-WORN CAMERA (BWC)

The Louisville Metro Police Department (LMPD) has adopted the use of wearable, on-officer cameras to further the mission of the department and enhance service to the community by **accurately documenting events, actions, conditions**, and statements made during citizen encounters, traffic stops, arrests, and other incidents in order to promote officer and public safety.

The LMPD has adopted the use of the WVS to accomplish the following objectives:

- **Enhance officer safety.**
- **Document statements and events** during the course of an incident.
- **Enhance the officer's ability to document statements and actions for both internal reporting requirements and for court preparation/presentation.**
- **Preserve visual and audio information for use in current and future investigations.**

- Provide an impartial measurement for self-critique and field evaluation during officer training.
- **Enhance the public's trust by preserving factual representations of officer-citizen interactions in the form of video and audio recordings, strengthening departmental transparency, and reducing complaints.**
- **Allow for the supervisory review of officer-citizen contacts, critical incidents, and other police operations.**

WVS equipment is the responsibility of the individual officer to whom it is assigned.

The WVS shall be used to record **all calls for service and law enforcement activities/encounters** (e.g. arrests, citations, stops, pursuits, Code 3 operations/responses, searches, seizures, interviews, identifications, use of force incidents, collisions, transports, **warrants**, etc.).

Officers will also **immediately activate their WVS in recording mode prior to engaging in all law enforcement activities or encounters**. Officers will verify that their WVS is functioning in recording mode by listening for the audible tone and/or checking the visible light indicator.

During their tour of duty, or while engaged in uniformed law enforcement-related **secondary employment**, officers shall maintain their WVS in a constant state of operational readiness. The WVS shall be used to record all calls for service and law enforcement activities/encounters (e.g. arrests, citations, stops, pursuits, Code 3 operations/responses, searches, seizures, interviews, identifications, use of force incidents, collisions, transports, warrants, etc.).

Officers shall not erase, destroy, alter, or tamper with recordings.

8.12.4 PROCEDURES FOR OFFICERS INVOLVED (KACP 1.12)

Officers involved in use of force actions or motor vehicle collisions, which result in death or serious physical injury, will immediately be placed on administrative leave or administrative reassignment, pending an administrative investigation (refer to SOP 2.5) (KACP 10.2a). Each officer involved will be **assigned an escort officer at the scene** by his/her commanding officer. The escort officer should be a Peer Support Team (PST) member, departmental chaplain, or commanding officer, when possible. The escort officer should not have been involved in the critical incident and should **remain with the officer throughout the entire initial investigation**.

The escort officer is responsible for:

- Explaining the investigative process to the officer involved.
- Assisting the officer in contacting his/her private attorney, friends, or family members, as requested.

- Transporting the officer to the PIU office, when requested by the PIU Commander or investigators.
- Verifying that the officer is isolated from all non-essential individuals for the remainder of the initial investigation.
- Transporting the officer home at the conclusion of the initial investigation.

The PIU will secure Mobile Video System (MVS) footage and Wearable Video System (WVS) footage belonging to involved and responding officers.