

| | 2:28:35 | First reference to a suspect description was made by CSPD "White male with ROTC uniform, burgundy shirt" |
|-------|---|--|
| | 2:29:06 | Deputy Peterson asks if they know where the shooter is and Officer Perry transmits, they are " entering the building in front of the 13 building, building 14, 17K4 and myself are entering." |
| | 2:29:09 | Coral Springs PD School Resource Officer Tim Burton arrived with his rifle and assumed cover behind a tree |
| 8:00 | 2:29:38 | CSPD 1st to approach building #120 |
| | 2:30:11 | No one has identified the suspect via radio, and no one knows where he is per BSO radio transmissions |
| 9:51 | 2:31:29 | CSPD leads the approach to building #120 |
| | 2:31:39 BSO Dispatch timestamp | Deputy Peterson: "We're in total lock down right now nobody's leaving the school. Everybody's in lockdown." |
| 11:08 | 2:32:46 | CSPD Mazzei leads entry of 8 officers into west side of building #120 |
| | 2:33:48 | Coral Springs PD Sgt. Bruce Kozlowski and Officer Rich Best arrived at the scene and ran south to Deputy Peterson's location. Deputy Peterson advised Best, "Shots fired. The shooter is on the second or third floor." |
| | 2:35:03 | Officers received a report that shooter is on the north side parking lot. Stand by for a description They do not have a description. |
| | 2:36:29 | CSPD officers (approximately 12) are observed entering the first floor form the east door. There are two BSO deputies (Deputy Jermaine Johnson and Deputy Carbocci) with this team. |
| | 2:39:50 | Coral Springs and BSO were working off of different channels. "We need to know what channel they are working off of so we can patch." Sierra 11: "We are like working two separate operations until we do that." |
| | 2:41:46 | Deputy Peterson was on his school radio talking with Assistant Principal Morford as Morford and Greenleaf were reviewing the surveillance video and was in the process of attempting to track the suspect, not knowing at that time that the video was 20 minutes behind |
| | 2:50:00- 2:52:10 | Cruz enters Walmart, leaves Walmart |
| | 2:25:10 | Officers do not yet realize that what they are seeing on school videos is not in real time but in fact is 20 minutes behind and the shooter is long gone. |



| | "They are monitoring the subject right now. He went from the third floor to the second floorthird to the second floor. He may have a gas mask on now. Standby for further. They are |
|---------|---|
| * | monitoring him on camera right now." |
| | Unknown: "What building?" |
| | 7Kilo1 (Rossman): "Subject is now back on the second floor. He was on the third and back now on the second. We are in the 120 Building." |
| 2:57:03 | Deputy Peterson and AP Morford were conversing via radio about tracking Cruz through Building 12 (Law Enforcement Response p253) (per LER John Suess timeline) |
| 2:59:09 | It is believed that Deputy Peterson advised CSPD that Cruz fled building 12 without his gun (Law Enforcement Response p258) (per LER John Suess timeline) |
| 3:02:20 | "Yes, sir, they are following him, but <u>it's about a 20-minute</u> <u>delay</u> . They are following him on video on the camera leaving the building running south." By this time, suspect Cruz is at McDonald's. |
| 3:40:00 | Cruz was detained at 4700 Wyndham Lakes Drive, 2.1 miles from shooting scene. |

Note that "building 1200" and "building #12" are used interchangeably within all documents and both refer to the building where the shooting took place.



APPENDIX B

List of 10 School Shootings with at Least 3 Killed and 3 Wounded Between April 1999 and November 2018

Between 1999 and 2021 there have been several school shootings where students or teachers were killed by gunfire. In most cases, these shootings were conducted by a lone male shooter where he shot and killed students or teachers and in most cases the shooter then disengaged and ran off or committed suicide.

Peterson Report - 2.21.22

Final Audit Report

2022-02-21

Created:

2022-02-21

By:

Eagle HR (hr@eaglesg.com)

Status:

Signed

Transaction ID:

CBJCHBCAABAAo09uFGsLmFvxCoL6uHCN0gtl7HQ4AvVJ

"Peterson Report - 2.21.22" History

- Document created by Eagle HR (hr@eaglesg.com) 2022-02-21 6:30:12 PM GMT- IP address: 174.79.184.220
- Document emailed to Philip P. Hayden (phayden@eaglesecuritygroup.com) for signature 2022-02-21 6:32:47 PM GMT
- Email viewed by Philip P. Hayden (phayden@eaglesecuritygroup.com) 2022-02-21 6:48:20 PM GMT- IP address: 173.72.175.76
- Document e-signed by Philip P. Hayden (phayden@eaglesecuritygroup.com)

 Signature Date: 2022-02-21 6:49:04 PM GMT Time Source: server- IP address: 173.72.175.76
- Agreement completed. 2022-02-21 - 6:49:04 PM GMT





Eagle Security Group, Inc.

1380 Central Park Boulevard, Suite 202 Fredericksburg, VA 22401 Phone: 540-548-4080 Fax: 540-301-1396 www.eaglesecuritygroup.com

CURRICULUM VITAE - PHILIP HAYDEN, Ed.D.

SUMMARY

During his 26 years as an Agent with the Federal Bureau of Investigation (FBI), Dr. Philip Hayden, while serving in the FBI's Chicago and New York offices, was involved in criminal investigations, organized crime, and foreign counterintelligence. In addition to serving as a Special Agent in those offices, he became a program manager and tactical instructor at the FBI Academy in Quantico, Virginia. Dr. Hayden was involved in writing dozens of lesson plans and assisted in developing the SWAT manual and tactical lesson plans. In addition, he provided hands-on training to his fellow FBI Special Agents in the SWAT program, Violent Crimes Task Forces, and new and senior agents' training. He led training courses and developed curricula to prepare thousands of federal agents, military, and police officers worldwide on specific FBI techniques and procedures in order to help them better prepare to perform in a more efficient and safe manner. Dr. Hayden, as the lead instructor, provided training to over 6,000 federal, state, city, and local police officers throughout the United States and an additional 4,000 police officers worldwide on several concepts, to include the principles of arrest techniques, use of force, firearms, planning concepts, felony vehicle stops, high-risk entries, and investigative techniques. This training incorporated the concept and tactics for dealing with life-threatening issues that impact safety and survival. This program, which was designed, developed, and implemented by Dr. Hayden, is called the Law Enforcement Training for Safety and Survival (LETSS). Twenty years later, it is still being taught within the FBI.

With a Doctorate in Education, Dr. Hayden has built upon his extensive education and experience to become a consultant and court-certified expert witness, providing testimony in federal, state, county, and district courts in criminal and civil cases for both plaintiff and defense matters. Areas in which he has testified include: Use of Force; Appropriateness of Law Enforcement Training; High-Risk Arrest Procedures; Use of Electronic Control Devices; SWAT and Sniper Utilization; Tactical Training; Firearms; Rappelling; and the Tactical and Survival Mindset. He also served as a keynote and motivational speaker for a variety of groups while still a Special Agent in the FBI and later as a law enforcement consultant.

Dr. Hayden was featured in a made-for-TV documentary on the survival mindset for police officers, *Inside the FBI: Surviving the Street*, Printz Production, distributed by Chevron Publishing.

EXPERIENCE - PRIVATE SECTOR

2019 - present 1999 - present Consultant and Expert Witness, Eagle Security Group, Fredericksburg, Virginia
Consultant and Expert Witness, Philip Hayden & Associates, Inc., Fredericksburg, Virginia

Delivered expert testimony in deposition and trial in federal, state, county, and district courts in both criminal and civil cases for the Plaintiff and Defense. Court-certified over fifty times as an Expert Witness in the areas of *Use of Force; Police Tactics for Making Arrests; SWAT Operations; Law Enforcement Training; and Mental Mindset during High-Risk Situations*. Certified by the Force Science Institute on the mix of human dynamics involved in the complicated, confusing, and controversial uses of force by police and is one of the original Board Members for the Force Science Institute. Certified as a Litigation





Specialist conferred by the Americans for Effective Law Enforcement (AELE).

Provided consultation services for multiple agencies. Conducted security assessments for organizations, including *USA Today*, United States Agriculture, and several international companies in Sweden, Venezuela, Colombia, Peru, Paraguay, and Argentina. Designed security analysis programs and developed crisis management exercises for large corporations, such as Communication Resource, Inc. and Kroll and Associates; developed behavior-modification techniques designed to enhance performance for high-level executives at McKinsey and Company; handled body armor product development and sales as a consultant and representative for Safeboard Body Armor Company; and provided research and design for Volvo's North American prototype police vehicle as its senior consultant and product design specialist.

2006 - 2015

Concepts and Tactics for Survival, Inc., Fredericksburg, Virginia

2006 - present

International Training and Assistance, Inc., Fredericksburg, Virginia

As founder, CEO, and President of these two companies, provides local, national, and international police training for U.S. Law Enforcement Officers (LEOs); the prison system in North Carolina; and LEOs in Kansas, Texas, Florida, and California. Instructs LEOs internationally in Canada, Sweden, Finland, Ukraine, Nigeria, and throughout Latin America.

EXPERIENCE & ASSIGNMENTS - THE FEDERAL BUREAU OF INVESTIGATION

1992 - 1999

Supervisory Special Agent, Program Manager for the Law Enforcement Training for Safety and Survival Sub-Unit, FBI Academy, Quantico, Virginia

Designed, developed, and implemented the Law Enforcement Training for Safety and Survival (LETSS) program, which set the stage to teach law enforcement officers how to conduct arrests with potentially violent subjects in a way that enhances the officer's safety and the safety of other innocent persons, as well as the subject.

Conducted LETSS training for over 6,000 federal, state, city, and local police officers throughout the United States and to an additional 4,000 police officers and military personnel worldwide. Created and instituted the Tactical Instructor Program for the FBI that trained over 350 FBI Agents and police tactical instructors throughout the United States, Canada, and Sweden. These tactical instructors were strategically placed in every FBI field office throughout the United States, Canada, and Sweden in order to continue the LETSS program that the FBI Director and top FBI officials promoted. The LETSS program was instituted in 1992 by Dr. Hayden and is still in use today. This program has trained over 20,000 law enforcement officers worldwide and was hailed by FBI Director, Louis Freeh, and other assistant directors of the FBI as one of the best tactical programs ever developed within the FBI.

Served as a member of the FBI's Shooting Review Group, which was comprised of senior managers and executives charged with reviewing all FBI incidents where a firearm was



discharged, to include both intentional shootings and accidental/negligent discharges. Conducted detailed analyses of these incidents to ensure the application of force or handling of the firearm was in alignment with FBI policies and procedures to include the Deadly Force Policy.

1990 - 1992 Supervisory Special Agent, Program Manager for the Tactical Instructor Program for New Agent Training, FBI Academy, Quantico, Virginia

Developed the tactical training curricula for New Agent training and personally taught over 500 new agents on the principles of arrest techniques, firearms, planning concepts, and investigative techniques. This program continues to this day.

1983 - 1990 Supervisory Special Agent, Special Operations and Research Unit (SOARU), FBI Academy, Quantico, Virginia

Primary instructor for SWAT, Tactical Firearms, and Sniper programs and instrumental in writing over 20 tactical lesson plans for SWAT personnel. Instructed over 65 SWAT training programs throughout the U.S. Created and instituted the Tactical Air Operations (TAO) and Rappel Master Programs for SWAT personnel and provided instruction for over 1,500 FBI and local law enforcement SWAT personnel. Designed the training curricula for SWAT tactical and rescue rappelling and helicopter tactical operations, to include insertions via helicopter and rappelling.

1973 - 1983 Special Agent, FBI in New York and Chicago

Responsible for investigations and conducting arrests in criminal matters, organized crime, and foreign counterintelligence. Participated in hundreds of arrests of violent and non-violent criminals as both a criminal investigator and a SWAT-certified Special Agent. Certified by the FBI as an instructor in tactical concepts for law enforcement officers, firearms, and defensive tactics. Provided training to FBI Agents in the New York office and local law enforcement organizations. Assigned to select teams in Special Weapons and Tactics (SWAT), crisis management, sniper, rappelling, helicopter tactical operations, hostage negotiations, and bomb investigations as a field agent. Certified as an FBI pilot-incommand for fixed-winged aircraft.

MILITARY EXPERIENCE

1964 - 1968 United States Army

Dr. Hayden entered the U.S. Army as a Private in 1964, attended non- commissioned officer's school, and was promoted to Sergeant E-5. Eighteen months later, he was commissioned as a 2nd Lieutenant in the Infantry. In 1966, he was assigned to the 173rd Airborne Brigade and sent to Vietnam. In 1967, he was seriously wounded; and in 1968, he was medically retired with the rank of Captain. He received training in infantry and demolitions, as well as survival, sniper, airborne, ranger, pathfinder, and jungle schools. Dr. Hayden was awarded the Purple Heart, Vietnamese Cross of Gallantry, Conspicuous Service



Cross, Army Commendation for Valor and Bronze Star for Valor, and the Distinguished Service Cross (DSC), which is awarded for extraordinary heroism.

CONSULTANT and EXPERT WITNESS EXPERIENCE

- <u>United States Attorney's Offices</u> in New York City and the Western District of New York, New York; District of New Jersey; Washington, D.C.; El Paso, Texas; Portland, Oregon; Alexandria, Virginia; and Eastern District of Pennsylvania
- <u>State, County and City Attorneys' Offices</u> for the cities of Lafayette, Louisiana; Miami Dade and Sarasota, Florida; Wilmington, Delaware; and Dallas, Texas
- County Attorney's Office for Prince George's County, Maryland
- City Attorney's Office for Trumbull, Connecticut
- <u>Defense and Plaintiff Attorneys</u> in Birmingham and Montgomery, Alabama; Denver, Colorado; Tampa, Florida; Kansas City, Kansas; New Orleans and Shreveport, Louisiana; Baltimore, Maryland; Southaven, Mississippi; Las Vegas, Nevada; Austin and Pasadena, Texas; Richmond and Salem, Virginia; Washington, D.C.; and the Swedish Defense Ministry in Stockholm, Sweden

ARTICLES WRITTEN FOR THE FBI

- Redesigning the Curriculum of a Survival Awareness Course for Law Enforcement Officers
- An Evaluation of the Adequacy of Basic Training for the Safe Apprehension of Dangerous Criminals by Violent Crimes Task Forces
- A Comparison of Personality Factors of Law Enforcement Officers Related to Safely Executing Arrest Warrants
- Development of a Curriculum for Teaching the FBI Deadly Force Policy to All Federal Violent Crimes Task Forces
- Development of a Training Program for Teaching FBI Task Force Members How to Properly Prepare for Conducting High-Risk Arrests
- Comparison of the Performance of Three Types of Ammunition for Use by the Federal Bureau of Investigation

VIDEOS PRODUCED FOR THE FBI

Spear-headed the production of videos that were used in FBI training classes related to Approaching an Entry Point; Clearing Stairways; Conventional Room Entry; Planning an Arrest or Search Warrant; Techniques Outside an Entry Point; Clearing a Hallway; Felony Vehicle Stops; Ballistic Shields; and Conducting High-Risk Searches and Arrest Warrants.



LESSON PLANS DESIGNED, DEVELOPED, and IMPLEMENTED FOR THE FBI'S VIOLENT CRIMES TASK FORCES

Instrumental in the design, development, and implementation of the following FBI lesson plans:

- Making Arrests and Handling Subjects
- Preparation for Arrest and Search Warrants
- Site Surveys
- Law Enforcement Operation Order for Arrest and Search Plans
- Approaching an Entry Point
- Conventional Room Entry
- Techniques for Room Clearing
- Procedures, and Equipment for Room Clearing
- Clearing Hallways
- Interior Movement: Stairways, Attics, Roofs, and Crawl Spaces
- Vehicle Stops
- Quick Entries
- Use of Ballistic Shields in Entries and Vehicle Clearing
- Mechanical Breaching
- Tactical Air Operations
- Rappel Master Instructor

FORMAL EDUCATION

| 1997 | DOCTORATE OF EDUCATION (Ed.D.) – Adult Education |
|------|---|
| | Nova Southeastern University |
| 1980 | MASTER OF SCIENCE (MS) – Accounting |
| | Adelphi University |
| 1972 | BACHELOR OF SCIENCE (BS) – Business Administration/Accounting |
| | Adelphi University |

CERTIFICATIONS

| 2014 | Certified by the Force Science Institute on the mix of human dynamics involved in the complicated, confusing, and controversial uses of force by police |
|------|---|
| 2010 | Certified Litigation Specialist conferred by the Americans for Effective Law Enforcement |
| 2010 | Electronic Control Device (ECD) Forensic Analyst conferred by the Institute for the Prevention of In-Custody Deaths, Inc. |



PROFESSIONAL ASSOCIATIONS

- Federal Bureau of Investigation Agents Association
- International Association of Chiefs of Police
- International Society of Law Enforcement Trainers
- Tactical Officers Association
- International Society of the 173rd Airborne Brigade
- Member of the Society of Former FBI Agents (2001 present)
- National Advisory Board, Force Science Research Center, Minnesota State University (May 2002 present)
 - Reviewed policy, procedures, and research regarding police use of force during arrest procedures, vehicle stops, etc.
- New Jersey State Law Enforcement Officers Association
- Private Investigator, Certified by the Commonwealth of Virginia, Department of Criminal Justice Services (1999)
- Seccredo Inc. International (January 1999-2009)
 - Board Member, Consultant and Security Specialist
 - Conducted security, leadership, and management seminars for European corporations

EAGLE

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Fredericksburg, Via 22401
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Fax: 540-301-1396
www.eaglesecuritygroup.com

July 15, 2019

Christopher J. Stearns, Esq.
Johnson, Anselmo, Murdoch,
Burke, Piper & Hochman, P.A.
2455 E. Sunrise Boulevard, Suite 1000
Fort Lauderdale, Florida 33304

Re: Agreement/Contract for the Scot Peterson Case

Dear Mr. Stearns,

This letter will serve to confirm that you have retained Eagle Security Group/Dr. Philip Hayden to provide Expert consultation and testimony in the above-referenced matter.

Scope of Service: The Expert will review and analyze materials and documents provided by the client and, upon request, provide a verbal or written report of opinions to the client. The attorney/client agrees to provide all information, documents and materials reasonably available or requested as discovery rules permit at least 60 days prior to any examination, report, deposition or trial. This will provide adequate opportunity for review unless other specific arrangements are agreed upon. You and your law firm will determine the scope of work to be performed by Dr. Hayden as well as the need for any written report, travel or court appearances.

Retention and Retainer Fee: The parties agree that Eagle Security Group/Dr. Philip Hayden will only be considered to be retained by the client after this contract has been mutually executed and the client has tendered an advance retainer of \$6,000.00, half of which is non-refundable. This advance is not intended to be an estimate of the total cost of the engagement, as it is not possible to estimate precise fees required to complete this matter.

Payment terms: Services of the Expert will be billed at a rate of \$350 per hour for all work including but not limited to record review, research, analysis, calculations, conference calls, report writing, preparation time, travel and testimony. All hours will be billed against the retainer. Once 80% of the retainer has been expended, an additional retainer of \$10,000 will be requested to work against and is due within ten (10) calendar days of the request. All invoices must be paid in full prior to reports being issued or testimony services provided. A 10% late fee will be added to any bill that remains unpaid after 90 calendar days. When services are no longer required, the unused balance of the retainer will be returned to the client within 10 calendar days of a written request.

Travel Time: All travel time will be billed at \$350.00 per hour with a minimum of six hours. The time which exceeds six hours will be billed in 15-minute increments. Travel time will be calculated upon leaving Fredericksburg, Virginia, until arrival at attorney's office or hotel at the designated location. A maximum of eight hours travel time per day will be charged within the 48 contiguous states. Travel outside this region will be agreed upon prior to travel. Travel expenses include but are not limited to economy plus airfare, lodging, ground transportation, and meals will be cost reimbursable.

Eagle (Tax ID # 04-3621441)



Reports: A written report will be prepared only upon request and any reports or data prepared by the Expert in connection with this engagement will be submitted solely to you unless you or the court should so direct or require.

Depositions and Trials: A fee of \$350.00 per hour, with a minimum of six hours, will be charged for being deposed or testifying at trial. After six hours, time will be charged in 15-minute increments. Should testimony be required at deposition or trial, fees for time the Expert is asked to reserve for testifying along with estimated preparation time for that testimony must be paid in full five (5) calendar days prior to the time reserved for the scheduled testimony. If a scheduled deposition or trial is cancelled less than 10 calendar days prior to such event, regardless of reason, a cancellation fee of ten (10) hours will occur.

Stand-by Time: Stand-by time will be invoiced at \$350.00 per hour. Stand-by time will be calculated for any time Dr. Hayden is requested to be waiting at a site, away from his office, such as waiting to testify in trial or any other services the client has requested of him which is not included in this contract.

Right to Withdraw from Case: The Expert shall have the right to withdraw from the case, without liability if the client violates any of their duties including, but not limited to, unprofessional conduct, business ethics violation, and non-payment. Likewise, the client also has the right to terminate services with the Expert at any time and for any reason.

Please confirm your agreement to the foregoing terms and conditions by signing this retainer agreement below and returning to Eagle Security Group along with the initial \$6,000 retainer and materials for review.

Matthew V. Nisley Date 7/15/2019

Matthew Nisley, President

Date 7/15/2019

Philip P. Hayden Ed. D. Consultant/Expert Witness

Date Client Printed Name & Signature

Marjory Stoneman Douglas Cases Scot Peterson Matter Case No.: CACE-19-80000

Documents Reviewed by Dr. Phil Hayden as of February 21, 2022

Depositions:

- Israel, Scott (February 25, 2021)
- Levy, Arik (March 25, 2021)
- Medina, Andrew (February 25, 2019)
- Peterson, Scot (February 26, 2019)
- Samaroo, Samuel (March 25, 2021)
- Scott, Zachary (July 22, 2021)
- Strange, Dr. Deryn Exhibits Only

Background and Investigative Documents:

- 1. Complaint Control Forms and Employee Notifications
 - Deputy Goolsby Notification.pdf
 - Deputy Kratz Notification.pdf
 - Deputy Perry Notification.pdf
 - Deputy Peterson Notification Resignation.pdf
 - Personnel Complaint Control Form Rev. Feb 15, 2019.pdf
 - RAA Deputy Eason Notification.pdf
 - RAA Deputy Stambaugh Notification.pdf
 - RAA Sergeant Miller Notification.pdf
- 2. Investigative Action Report Carrillo-Razi
 - 2018-0040 Investigative Report.pdf
- 3. MSD DLE and Civilian Reports and Statements
 - BSO Communications and Information Tech Statements
 - o BSO Comm Bosket, Trikia
 - o BSO Comm- Dibernado, Marysol
 - o BSO Comm- Mitchell, Kevin
 - o BSO Comm Mize, Angela
- 4. MSD Commission Reports
 - 2019 MSD Public Safety Commission Report (Final)
 - Draft MSD Commission Report
 - Law Enforcement Response John Suess
 - MSD Commission Report Deputies who Heard Gunshot Report
- 5. MSD Commission Animation of Shooting
- 6. MSD BSO/Coral Springs PD/Fire Audio and 911 Timelines and Dispatch
 - BSO Dispatch and 911 Calls



- CSPD 911 Calls
- CSPD Fire Department Dispatch
- MSD CAD and Incident Details 1802-000525 526 and 527
- MSD Coral Springs PD Dispatch Audio and Transcription
- MSD Timelines
- 7. BSO Training Active Shooter Lesson Plans, Etc.
 - Combat Life Saver Lesson Plan March 2015
 - M01-497 Critical Incident Response Training for Supervisors October 2015
 - M01-513 Response to Active Killer (updated 2018)
 - M01-538 DLE Active Killer CTE Lesson Plan
 - M04-290 Leadership and Decision Making
 - M05-054 Rapid Response to an Active Shooter
 - Peterson Training File Active Shooter RTF (Train the Trainer)
- 8. BSO Active Shooter Policies
 - 01-11. Command and Control Final 07-21-2014
 - 17-01. Body Worn Cameras
 - Active Shooter SOP 3-28-2016
 - DLE SOP 4 37 Active Shooter Col Cvr (OPS Ord 18-14)
 - DLE SOP 4 37 Active Shooter Highlighted (OPS Ord 18-14)
 - Parkland District Active Shooter Plan Sergeant Miller
- 9. Civil Depos Medina and Peterson
 - 2018-0040 A-Index
 - Andrew Medina
 - Scot Peterson
 - 2019-05-22-IA2018-0040-Brian Miller Interview
 - DPS Final Disposition Arthur Perry
 - DPS Final Disposition Brian Goolsby
 - DPS Final Disposition Michael Kratz
 - Final Disposition and Termination Form Brian Miller
- 10. Garrity Statement and Associated Documents Sergeant Miller
 - 2019-04-01-IA2018-0040-Sergeant Miller-7154 (Audio)
 - Deputy Miller Digital Transfer
 - IA2018-0040-Sergeant Miller Interview
 - Sergeant Miller Index and Doc March 12, 2019
- 11. Garrity Statement and Associated Documents Deputy Eason
 - 2019-03-28-IA2018-0040-Deputy Eason-7154.wma (Audio)
 - Deputy Eason Digital Transfer
 - Deputy Eason Garrity Index and Docs
 - IA2018-0040-Deputy Eason-7154
- 12. Garrity Statement and Associated Documents Deputy Stambaugh
 - 2019-03-28-IA2018-0040-Deputy Stambaugh-7154 (Audio)
 - Deputy Stambaugh Digital Transfer
 - Deputy Stambaugh Garrity Index and Docs
 - IA2018-0040-Deputy Stambaugh-7154
- 13. Garrity Statement and Associated Documents Deputy Kratz

- 2019-03-28-IA2018-0040-Deputy Kratz-7154 (Audio)
- Deputy Kratz Digital Transfer
- Kratz Garrity Index Documents
- IA2018-0040-Deputy Kratz-7154
- 14. Garrity Statement and Associated Documents Deputy Goolsby
 - 2019-03-20-IA2018-0040-Deputy Goolsby-7154 (Audio)
 - Deputy Goolsby Digital Transfer
 - Garrity Index Disclosure Garrity Warning Deputy Goolsby
 - IA2018-0040-Deputy Goolsby-7154
- 15. Garrity Statement and Associated Documents Deputy Perry
 - 2019-03-26-IA2018-0040-Deputy Perry-7154 (Audio)
 - Deputy Perry Digital Transfer
 - Garrity Indices Garrity Warning Disclosure
 - IA2018-0040-Deputy Perry-7154

Other Materials Reviewed:

- Broward County Sheriff's Office Investigative Report
- Eagle Retainer Agreement
- Media Articles and Research
- Notice of Deposition for Dr. Philip Hayden
- Peterson, Scot BSO Personnel Complaint Control Form
- Peterson, Scot Timeline
- Photo of Cruz in Long Hallway
- Photos of Marjory Stoneman Douglas Building #12
- Pinellas County PowerPoint Presentation
- Site Visits, August 3, 2021, and November 4, 2021
- Video Cameras in Building 12, reviewed November 4, 2021
- Zoom Interview of Scot Peterson, October 28, 2021

Marjory Stoneman Douglas Cases Scot Peterson Matter Case No.: CACE-19-80000

MATERIALS FROM MY OWN RESOURCES

- 1. IACP Training Key 398 Reasonable and Unreasonable Fear in Police Encounters
- 2. IACP Training Key 399 The Dynamics of Fear in Critical Incidents
- 3. Firearms Training Manual, U.S. Department of Justice, Federal Bureau of Investigation
- 4. Text: Winning the Stress Challenge, Nick Hall, Ph.D. (2001)
- 5. Text: Orchestrating the Mind and Body, Nicholas Hall, Ph.D. (1998)
- 6. Text: Behave, The Biology of Humans at Our Best and Worst, Robert M. Sapolsky, Ph.D. (2018)
- 7. Text: A Clinical Guide to the Treatment of the Human Stress Response, George S. Everly, Jr., Ph.D. (1989)



Dr. Philip Hayden

A LISTING OF OTHER CASES IN WHICH I HAVE TESTIFIED IN TRIAL OR DEPOSITION IN THE PAST FOUR YEARS

Expert Witness Testimony in Court and Grand Jury as of 2/14/2022:

- 11/16/21 Grand Jury Investigation into the events of February 24, 2021 (Four officers Use of Force). Suffolk County District Attorney' Office, Suffolk County, New York. Assistant District Attorney Carey Ng
- 10/18/19 State of Louisiana v. Grover Cannon: 1st JDC nos. 334302 & 334303, Section 4, LPDB File no. 15-CA-0244
- 8/28/19 State of Mississippi vs. Todd Gregory Edmonds, City of Southaven, Southaven Municipal Court, Incident No: 201600070083, Case Number CR2017-0150JMD
- 8/21/18 Dallas, Texas, S.O. #17-045812, Death of Jordan Javon Edwards, Murder, Texas Penal Code Sec. 19.02 (b), (1&2)

Expert Witness Testimony in Depositions as of 2/14/2022:

- 2/8/22 United States District Court for the Eastern District of Virginia, Derrick D. Rountree, v. Aaron Nkrumah Christie, case no. 2:20cv644
- 12/18/20 Dallas, Texas, Odell Edwards, et. al. v. Roy Oliver, et. al, for cause No. 3:17-CV-01208-M
- 6/17/20 United States District Court for the District of New Jersey, Civil Action NO: 15-cv-3215-ES-JAD, Leonard Capra vs Officer John Knapp Detective Alexander et. al

