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## Motion in Limine to Exclude Expert Testimony of Gregg McCrary

Terry H. Gilbert  
*Attorney for Sheppard Estate*

George H. Carr  
*Attorney for Sheppard Estate*

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1999 DEC 21 1:27

IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

ALAN J. DAVIS, Special Administrator  
of the Estate of  
SAMUEL H. SHEPPARD

Plaintiff

vs.

STATE OF OHIO

Defendant

) Judge Ronald Suster

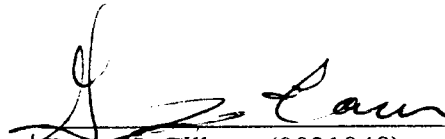
) Case No. 312322

) MOTION IN LIMINE  
) TO EXCLUDE EXPERT  
) TESTIMONY OF  
) GREGG MCCRARY

) Rule 104(A) Hearing Requested  
)

Plaintiff hereby moves this Court for an Order striking Gregg McCrary as a potential expert witness and to preclude the Defendant, State of Ohio, from offering any testimony from him. The reasons and authorities for granting this motion are set forth fully in the attached brief in support, which is hereby incorporated by reference.

Respectfully submitted,



George H. Carr (0069372)

1700 Standard Building

1370 Ontario Street

Cleveland, OH 44113

(216) 241-1430

*Attorneys for Plaintiff*

## **Brief In Support**

### **I. Background**

Recently, Plaintiff has received notice that the State intends to introduce the testimony of Gregg McCrary, a retired FBI investigator, and seek to qualify him as an "expert" witness. Because Mr. McCrary lacks the qualifications of an expert witness, his testimony should be excluded.

### **II. Law and Argument**

Ohio R.Evid. 702 governs the admissibility of expert opinion testimony in Ohio. The Ohio Supreme Court has ruled that scientific or technical evidence is "subject to a judicial analysis for prejudice" under Ohio R.Evid. 403, *State v. Pierce*, 64 Ohio St. 3d 490, 497, 597 N.E.2d 107, 112 (1992). In determining the admissibility of purported "expert" testimony, a trial court must examine the methods used by a proffered expert witness in reaching any conclusions, and the conclusions themselves, in balancing "the probativeness, materiality, and reliability of the evidence against the risk of misleading or confusing the jury or unfairly prejudicing the [adverse party]." *Id.* at 496, 597 N.E.2d at 112, *quoting* CASE NOTE, *UNITED STATES V. TWO BULLS: EIGHTH CIRCUIT ADDRESSES ADMISSIBILITY OF FORENSIC DNA EVIDENCE* (1991), 37 Loyola L.Rev. 173, 177.

This approach requires a trial court to critically examine a proffered expert witness' credentials and the methodology underlying the opinions reached by the witness, in order to prevent the jury from being misled or confused by expert testimony. Here, the State's proffered expert witness does not have adequate credentials to render opinion testimony regarding the issues in his report, and the conclusions in his report are unreliable.

#### **A. Credentials and Qualifications**

Ohio R.Evid. 702(B) requires that a witness be "qualified as an expert by specialized knowledge, skill, experience, training, or education regarding the subject matter of the testimony."

Here, Mr. McCrary's professional qualifications relate to criminal investigation, not any recognized field of analytical criminology. As reflected in his *curriculum vitae*, attached as Exhibit A, Mr. McCrary has a Bachelor of Fine Arts degree, and a Master of Arts in "Psychological Services." He adduces that he "has been a consultant to law enforcement agencies" during his long career. However, a review of his list of actual services rendered reveals that he has testified only once in a United States court, at a "hearing" in Massachusetts in 1996. While his "specialized knowledge, skill, experience, training, or education" may qualify him as a consultant in the course of criminal investigation, nothing in his background qualifies him to present opinion testimony to a jury regarding "behavioral criminology," his purported field of expertise.

Mr. McCrary renders opinions in at least three recognized scientific fields. Criminology is a social science that deals with the collection and interpretation of crime-related statistics. Criminalistics is a field of forensic science dealing with the analysis of physical evidence relating to crime. Victimology is a sociological specialty dealing with statistical analysis of crime patterns and the likely victims of various crimes.

However, Mr. McCrary possesses no "specialized knowledge, skill, experience, training, or education" in any of these fields. Nothing in his background reveals any training in these fields, and he does not state that he has ever testified as an expert witness in any of these fields.

In reality, Mr. McCrary's expertise seems to be in the novel scientific field of "behavioral criminology." No reference is made to any training in this area, or even to any standard treatises or commonly accepted theories central to this field. Therefore, pursuant to this court's duty to exclude testimony of purported experts which could prove misleading or confusing to the jury, Mr. McCrary should be prevented from testifying, as he does not possess adequate credentials or proof of

"specialized knowledge, skill, experience, training, or education regarding the subject matter of the testimony," as required by Ohio R.Evid. 702(B).

B. Reliability of Methods and Conclusions

Mr. McCrary's testimony should also be excluded because of his failure to satisfy the requirements of Ohio R.Evid. 702(C) that testimony be "based on reliable scientific, technical, or other specialized information."

In evaluating the reliability of scientific evidence, several factors are to be considered: (1) whether the theory or technique has been tested, (2) whether it has been subjected to peer review, (3) whether there is a known potential rate of error, and (4) whether the methodology has gained general acceptance. Although these factors may aid in determining reliability, the inquiry is flexible. The focus is "solely on principles and methodology, not on the conclusions that they generate."

*Miller v. Bike Athletic Co.*, 80 Ohio St. 3d 607, 611-612, 687 N.E.2d 735, 740 (1998), *quoting Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993) (citations omitted).

Nothing in Mr. McCrary's report can satisfy this standard of scientific reliability. His theories are not peer reviewed or published to a general community of "behavioral criminologists;" in fact, his *curriculum vitae* does not reveal a single published article or theory. Although "while peer review may be helpful, is it not absolutely necessary for an opinion to be admissible," *Miller, supra*, at 613, 687 N.E.2d at 741, the lack of peer review should be considered by this Court as weighing heavily against reliability. Similarly, without publication or peer review, an error rate cannot be derived, and tests cannot be conducted. Thus, Mr. McCrary's testimony is not "scientific" for purposes of Ohio R.Evid. 702(C).

Therefore, Mr. McCrary's testimony must be considered "technical or other specialized information" under Ohio R.Evid. 702(C). Even this non-scientific testimony must be scrutinized for reliability prior to its admissibility. *State v. Stowers*, 81 Ohio St. 3d 260, 262, 690 N.E.2d 881, 883

(1998). Only "[r]elevant evidence based on valid principles will satisfy the threshold reliability standard for the admission of expert testimony." *State v. Nemeth*, 82 Ohio St. 3d 202, 211, 694 N.E.2d 1332, 1339 (1998). Therefore, this court must prevent the admission of any testimony not satisfying this fundamental requirement.

Key questions for resolution by the trial court include: whether the reasoning or methodology can be or has been tested; whether the theory or technique has been subjected to peer review and publication; considerations of the known or potential rate of error and the existence and maintenance of standards controlling the technique's operation; and, finally, considerations of whether the methods or techniques have gained "general acceptance" should be considered.

*State v. Clark*, 101 Ohio App. 3d 389, 415, 655 N.E.2d 795 (1995).

Mr. McCrary's testimony is exactly the sort of purported expert testimony this threshold admissibility requirement was designed to prevent. Without reference to any "valid principles" from which he draws his conclusions, he opines that various elements of Dr. Sam Sheppard's alibi are inconsistent, and that various elements of the crime scene are inconsistent with various other theories of how the murder of Mrs. Sheppard was perpetrated, and are instead consistent with a "staged domestic homicide."

Mr. McCrary does not reach these conclusions through any recognized field of science. Criminology and victimology are statistical sciences, based on the statistical likelihoods of criminal activity within a given population. These sciences are only investigative tools, because no statistical analysis can be applied to a population sample of one; in other words, statistical analysis can be relevant in determining the most likely perpetrator of a crime during an investigation, but cannot be scientifically applied to determining the actual facts in an individual murder.

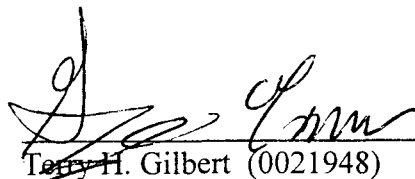
Mr. McCrary's theories and conclusions have not been tested; he has not pulished them, or subjected them to any other method of peer review; his technique cannot be quantified into any

meaningful calculation of errors or false positives; and his field, "behavioral criminology," is not generally recognized by the appropriate community. Thus, Mr. McCrary's testimony is not "reliable," as "scientific, technical, or other specialized knowledge" that would be helpful to the trier of fact.

### III. Conclusion

Because of the lack of scientific, technical, or specialized knowledge possessed by Mr. McCrary, he should not be permitted to testify, based on his lack of qualifications. Furthermore, the conclusions he reaches are not "reliable" within the meaning of Ohio R.Evid. 702(C). Therefore, this Court should enter an order *in limine* preventing his testimony at trial, as irrelevant and more prejudicial than probative.

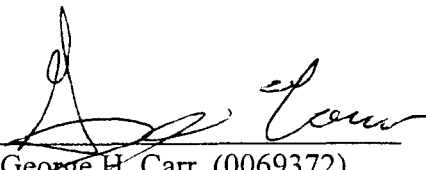
Respectfully submitted,



Terry H. Gilbert (0021948)  
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1700 Standard Building  
1370 Ontario Street  
Cleveland, OH 44113  
(216) 241-1430  
***Attorneys for Plaintiff***

**Certificate of Service**

The undersigned certifies that the foregoing Motion *in limine* to Exclude Expert Testimony of Gregg McCrary has been served on William Mason, Prosecuting Attorney, Justice Center, 9th Floor, 1200 Ontario Street, Cleveland, Ohio 44113 on this 21<sup>st</sup> day of December, 1999.

  
George H. Carr (0069372)  
*Attorney for Plaintiff*





## BEHAVIORAL CRIMINOLOGY *International*

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**GREGG O. MCCRARY**  
SUPERVISORY SPECIAL AGENT  
F.B.I. (RETIRED)

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SUITE 213-1  
FREDERICKSBURG, VIRGINIA 22401

**GREGG O. MCCRARY**  
**SUPERVISORY SPECIAL AGENT (RETIRED)**  
**FEDERAL BUREAU OF INVESTIGATION**  
**NATIONAL CENTER FOR THE ANALYSIS OF VIOLENT CRIME**  
**FBI ACADEMY QUANTICO, VIRGINIA, USA**

### **EDUCATION**

Bachelor of Fine Arts Degree, Ithaca College, Ithaca New York, 1967  
Graduate studies, Criminal Justice, Long Island University 1975-1976  
Additional Graduate studies at University of Virginia 1989-1990  
Master of Arts in Psychological Services, Marymount University Arlington, VA 1992

### **EMPLOYMENT**

Federal Bureau of Investigation, Special Agent (1969-1994)  
Threat Assessment Group (1995-1997)  
Behavioral Criminology International (1998-Present)

- Independent Contractor for:
  - Park Dietz and Associates, Newport Beach, CA
  - Threat Assessment Group, Newport Beach, CA
  - Environmental Criminology Research Inc., Vancouver, BC

### **SPECIALIZED TRAINING**

FBI In-Service Training:

Selective Operations Seminar (1978)  
Drug Enforcement Administration Training (1979)  
Labor Racketeering (1980)  
Special Weapons and Tactics (1980)  
Expert Firearms and Defensive Tactics Instructors School (1981)  
Crisis Management (1981)  
White Collar Crime/Fraud (1982)  
Profile/NCAVC Coordinator (1985)  
Narcotics Raid Planning (1986)  
Advanced Profile/NCAVC Coordinator (1987)  
Criminal Sexuality Instructor (1987)  
Arson Investigation (1988)

Advanced Criminal Sexuality Instructor (1991)  
Advanced Violent Crime Investigators Seminar (1992)

### **OTHER TRAINING**

Black Belt Instructor Shorinjii Kempo (1984)  
Basic Forensic Pathology  
Armed Forces Institute of Pathology (1988)  
Reid School of Interview and Interrogation (1988)  
Advanced Forensic Pathology  
Armed Forces Institute of Pathology (1988)  
Scientific Content Analysis by Avinom Sapir Rockville, MD (1991)  
International Conference on Violent Crime, Barrie, Ontario Canada (September 1999)

### **MAJOR PRESENTATIONS**

Charles O. Bick College  
Toronto, Ontario Canada 1986

State University College at Brockport, NY (1987)

Five State Peace Officers Association  
Woodward, Oklahoma October 12-14, 1988

Bureau of Criminal Apprehension  
St. Paul, Minnesota February 6-8, 1989

Harvard Associates of Police Science  
University of Maryland Medical School  
Chief Medical Examiner's Office  
Baltimore, MD 1989

First Annual Governors' Conference on Violent Crime  
Myrtle Beach, South Carolina  
May 18, 1989

International Criminal Investigation and Training Program (ICITAP)  
Criminal Investigative Analysis  
Belize, Central America  
Principal Instructor August 18-26, 1989

University of Virginia  
Institute of Psychiatry and the Law  
Featured Speaker 1989

Gregg O. McCrary  
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Metropolitan Toronto Police  
Criminal Sexuality Seminar  
Principal Instructor 1990

Colorado Association of Sex Crime Investigators  
Glenwood Springs, Colorado  
Principal Instructor May 15-18, 1990

Ontario Police College  
Alymer, Ontario  
Criminal Sexuality Seminar  
Principal Instructor  
May 21-24, 1990

Southeastern Association of Criminal Investigators  
Criminal Sexuality Seminar  
Principal Instructor  
Tampa, Florida September 15-20, 1990

Seattle, Washington  
Olympia, Washington  
Yakima, Washington  
May 6-10, 1991

Featured Speaker at Homicide Symposium,  
Crime Scene Analysts Conference and King  
County Police Sex Crime Investigators Training.

New York City Police  
Advanced Homicide Detective Training  
Featured Speaker May 1991  
New York, NY

FBI National Academy Retraining Seminar  
Violent Crime  
Rochester, New York June 23-26, 1991

Marymount University  
Psy Chi National Honor Society for Psychology  
Guest Lecturer "Inside the Violent Mind".  
Arlington, VA - October 1, 1991

FBI National Academy European Chapter  
Violent Crime Investigation  
Brussels, Belgium November 1992

Gregg O. McCrary  
Page 4

First International Symposium on Criminal Investigative Analysis  
Principal Instructor and Coordinator  
Vienna, Austria - October 1993

Policia Judiciare  
National Police Academy of Portugal  
Investigating Violent Crime  
Principal Instructor  
Lisbon, Portugal - November 1993

Cuerpo Nacional De Policia  
National Police Academy of Spain  
Investigating Violent Crime  
Principal Instructor  
Avila, Spain - December, 1993

Hungarian National Police  
Investigating Violent Crime  
Principal Instructor  
Budapest, Hungary - June 1994

French National Police  
Investigating Violent Crime  
Principal Instructor  
Paris, France - June 1994

California District Attorney's Association  
10th Annual Homicide Symposium  
San Diego, California  
January 1995

Defense Research Institute  
Premise Liability re Violent Crimes  
Boston, Massachusetts  
May 25-26, 1995

Pacific Coast Labor Law Conference  
Seattle, Washington  
Workplace Violence Prevention  
June 7-9, 1995

Grand Rounds  
University of Virginia Medical School  
Charlottesville, Virginia  
November 8, 1995

Gregg O. McCrary  
Page 5

Center for the Study of the Mind and Human Interaction  
University of Virginia  
Charlottesville, Virginia - January 17, 1996

Defense Research Institute  
Premises Liability for Violent Crimes  
San Diego, California  
March 27-29, 1996

Association of Trial Lawyers of America  
Premises Liability for Violent Crimes  
Mega Seminar  
Las Vegas, Nevada  
February 1997

Defense Research Institute  
Premises Liability for Violent Crimes  
New Orleans, Louisiana  
April 10-11, 1997

FBI National Academy  
International Retraining Symposium  
Burlington, Ontario Canada  
July 14 - 15, 1997

Northeastern Association of Forensic Scientists  
White Plains, New York  
October 17, 1997

Employers Reinsurance Corporation  
Violent Crime Seminar  
San Francisco, CA  
Oct. 27, 1997

Atlanta Apartment Association  
Premises Liability - Violent Crime Seminar  
Atlanta, Georgia  
May 20, 1998

"The Violent Mind"  
Nova Southeastern University  
(APA accredited)  
Ft. Lauderdale, Florida  
June 20 - 21, 1998

Association of Trial Lawyers of America  
Inadequate Security Litigation Group  
National Convention  
Washington, D.C. - July 13, 1998

Institute of Continuing Legal Education in Georgia  
Premises Liability-Violent Crime Seminar  
Atlanta, Georgia - November 5, 1998

Annual Claims Exposition & Conference  
Premises Liability - Violent Crime Presentation  
St. Louis, Missouri - November 13, 1998

Eastern Analytical Symposium  
Criminal Profiling  
Somerset, New Jersey - November 18, 1998

American Academy of Forensic Sciences  
Panel Member  
Suicide and Equivocal Death Investigations  
Orlando, Florida - February 15, 1999

Nova Southeastern University  
The Violent Mind (APA Accredited)  
Orlando, Florida - February 27-28, 1999  
Miami, Florida - May 15-16, 1999

## **OPERATIONAL SUPPORT OF MAJOR INVESTIGATIONS**

Agent McCrary has been a consultant to law enforcement agencies both nationally and internationally in over 1000 cases involving sexual homicide, serial murder, rape, arson, child abduction, child molestation, threat assessments and other violent crimes.

October 24, 1987 On-site consultation, Toronto, Canada re the homicide of Margaret McWilliams

November 9-11, 1988 On-site consultation, Little rock, Arkansas re the abduction of infant Christopher Michael Jones from a hospital.

November 21-23, 1989 On-site consultation, Toronto, Canada, re "The Scarborough Rapist"

January 12, 1989 On-site consultation with the Massachusetts State Police, New Bedford, Mass. re serial murder of prostitutes.

February 7, 1989 On-site consultation, prosecutive strategy re John William Doughty (kidnapping and attempted murder) St. Paul, Minnesota

April 26, 1989 On-site New Bedford, Massachusetts re serial killing of prostitutes.

April 27, 1989 On-site consultation re sexually sadistic rapist; Waterford, Connecticut

November 3-8, 1989 On-site consultation with Royal Bahamian Police re a serial murder investigation

November 12-18, 1989 ICITAP presentation and case consultation in San Jose, Costa Rica.

December 13-15, and 27-29, 1989 On-site consultation re serial killings of prostitutes, Rochester, New York.

December 26, 1989 On-site Consultation re mass murder of Harris Family, Ithaca, NY

September 4-6, 1990 Newark, New Jersey Multi-agency meeting re Eric Napoletano serial murder investigation.

January 9-11, 1991 Suffolk County New York Police, Kathy Woods Homicide

April 22-23, 1991 Multi-jurisdictional task force re Peter Stark, suspected serial killer, Province of Ontario, Canada

August 27-29, 1991 Phoenix, Arizona re the murders of nine individuals in a Buddhist Temple.

September 24-26, 1991 Greenville South Carolina State Organization of Victim's Assistance Multi-State Conference and case consultation with SLED re serial rapist.

October 16-22, 1991 Vancouver, BC On-site consultation re a series of sexual homicides.

November 5-8, 1991 Charleston, SC consultation re a series of rapes (The North Charleston Rapist).

March 18, 1992 - April 3, 1992 On-site consultation re murder of FBI Agent Stanley Ronquist - Kansas City

May - June of 1992

At Morristown, New Jersey re kidnapping of Sidney J. Reso, President of Exxon International

August 1992 Dr. Ernst Geiger and Magistrate Thomas Mueller, Vienna Austria re serial murder investigation (Signature Crime Analysis).

October 1992 Leslie Mahaffey, Kristen French homicides - Project Green Ribbon - St. Catharines, Ontario Canada.

November 1992, at Brussels Belgium and Amsterdam for FBINA presentation and case consultation re serial child molester.

March-April 1993 - At Waco, Texas re Branch Davidian standoff

May 1993 - At Vienna, Austria with Dr. Geiger and Thomas Mueller re three additional homicide cases

November 1993 - At Lisbon, Portugal re a serial murder investigation

December 1993 - At Avila, Madrid and Barcelona, Spain re unsolved homicide investigations

December 1993 - At Babenhausen, Germany re abduction and sexual homicide of a two-year-old female.

March 1994 - In Florida and Alabama re Frank Potts serial murder investigation

March of 1994 - In Mexico City assisting Mexican authorities re assassination of Presidential Candidate Colosio

June 1994 - At Graz Austria - provided expert testimony re Jack Unterweger, Serial Murderer.

June 1994 - At Budapest, Hungary re unsolved homicides with Hungarian National Police and Budapest Homicide

June 1994 - At Paris, France re unsolved homicides

September 1995 - At Morristown, New Jersey re Nicholas Muscio homicide investigation

January of 1996 - At Somerville, Massachusetts re Edward O'Brien homicide investigation

April of 1997 - Testified in homicide hearing for Edward O'Brien in Massachusetts

May of 1998 - At Ventameglia and San Remo Italy re on-going serial murder Investigation

July 29, 1998 - At University of Virginia, Institute of Psychiatry, Law and Public Policy, re serial murder investigation in Perth, Australia (Macro Task Force)

November, 1998 - At New Scotland Yard, London England re a series of rapes and a serial homicide investigation.

September, 1999 - At Barre, Ontario Canada with an Australian Multi-Agency Task force investigation a series of sexually sadistic homicides committed by a group of offenders.

#### **PUBLICATIONS:**

Contributing author to *The Crime Classification Manual* Macmillan Inc. 1992



A Typology of Interpersonal Stalking, Co-authored with Dr. Ann Burgess and others; published in the Journal of Interpersonal Violence - December 1996. Sage Publications.

#### **PROFESSIONAL AFFILIATIONS:**

Member of Editorial Review Board for Aggression and Violence a Professional Journal  
Member of the American Society for Industrial Security (ASIS)  
Member of the Association of Threat Assessment Professionals (ATAP)  
Member of the American College of Forensic Examiners (ACFE)  
Member of the American Society of Criminology (ASC)  
Member of the British Society of Criminology (BSC)  
Member of the Society for Former Special Agents of the FBI  
Charter Member of the International Homicide Investigators Association (IHIA)

#### **PUBLIC RECOGNITION OF AGENT McCRARY'S EXPERTISE:**

- 1) Noted British Criminologist and author Colin Wilson dedicated his 1990 book, "The Serial Killers" to Agent McCrary.
- 2) Agent McCrary's work in violent crime was featured in the Emmy nominated documentary "Mind of a Serial Killer" which was produced by NOVA for the Public Broadcasting system (PBS) in 1992.
- 3) Agent McCrary's work in an international serial murder investigation was highlighted in the documentary "A Stranger Murder" produced by the British Broadcasting Corporation (BBC) in conjunction with the Arts and Entertainment Network (A&E) in 1995.
- 4) Agent McCrary's expertise was featured in a documentary produced for Japanese National Television by FUJI Television Productions in 1995 entitled, "The Nonfiction Approach to Serial Killers".
- 5) Agent McCrary's expertise was featured in a documentary titled "Born to Kill" produced for Discovery Magazine and aired nationally on the Discovery Channel in 1998.
- 6) Agent McCrary's expertise in violent crime investigations was featured in a French documentary produced by Sciences et Avenir and French National Television in 1998.

Agent McCrary has worked with numerous victims groups throughout the United States and has served as a member of the national advisory board for Parents of Murdered Children.

Agent McCrary has provided expert commentary for such media organizations as NBC, ABC, CBS, Cable News Network (CNN), The Discovery Channel, 60 Minutes, NBC

Dateline, 48 Hours, Larry King Live, BBC London, RTL Television in Germany and other programs both nationally and internationally. He has provided expert opinions to various members of the print media including The New York Times, The Washington Post, and The Toronto Star. He currently serves as a crime consultant for NBC Network and appears on the Today Show and the NBC Nightly News.

### **FBI ASSIGNMENTS**

FBI Academy, Quantico, Va. 1988-1994  
Behavioral Science Unit  
Critical Incident Response Group

#### *Types of Crimes:*

- Threatening Communications and Extortions
- Product Tampering
- Sexual Homicide
- Serial Murder
- Mass Murder
- Serial Rape
- Stalking
- Homicide
- Arson
- Sex Crimes
- White Collar Crime
- Foreign Counterintelligence
- Kidnapping and Abduction
- Bank Robbery
- Organized Crime
- Drug Trafficking

#### *Services:*

- Criminal Investigative Analysis (Including Profiling)
- Assessments of Dangerousness
- Interview and Interrogation Techniques
- Expert Testimony
- Training and Research
- Investigative Strategy
- Personality Assessments

### **Buffalo Field Division, 1977-1988**

- White Collar Crime
- Foreign Counterintelligence
- Threats and Extortions
- Kidnapping and Abduction

Special Weapons and Tactics  
Bank Robbery  
Homicide  
Organized Crime  
Hijacking  
Drug Trafficking  
Expert Firearms and Defensive Tactics Instructor  
Special Weapons and Tactics Team Leader

New York City Field Division, 1971-1977

Foreign Counterintelligence  
Organized Crime  
Bank Robbery  
Homicide  
Hijacking  
Threats and Extortions  
Kidnapping and Abduction  
Loan Sharking and Gambling

Detroit Field Division, 1970-71

Bank Robbery  
Kidnapping and Abduction  
Homicide  
Threats and Extortion  
Hijacking