

WHISTLEBLOWING AND THE POLICE

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Introduction

Most Americans are familiar with whistleblowers, people who go public with information about corruption, fraud and abuse in their own organizations.² Whistleblowers are often seen on the nightly news and discussed in the morning newspapers. In December 2002, three whistleblowers were named *Time* magazine's "Persons of the Year."³ Whistleblowers have been the subject of *The New Yorker* cartoons,⁴ Hollywood films,⁵ and children's stories.⁶

Although there are many whistleblowers in the United States, some of whom are publicly praised, whistleblowing is not an easy endeavor. There are almost always dire consequences to whistleblowers, to their careers, and to their personal lives as a result of their actions.⁷ Some organizations make whistleblowing very difficult, and therefore, less probable.⁸ The police department is one of these organizations. In this paper I will argue that the character of the police department not only makes whistleblowing less likely to occur, it ironically makes it even more necessary. In addition, I will

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² Whistleblowing is a distinct form of dissent consisting of four elements: (1) the person acting must be a member or former member of the organization at issue; (2) his information must be about nontrivial wrongdoing in that organization; (3) he must intend to expose the wrongdoing; and (4) he must act in a way that makes the information public.

³ Lacayo, Richard, Ripley, Amanda: "Persons of the Year," *Time* (December 30/ January 6, 2002) pp. 32-33.

⁴ Johnson Roberta Ann, *Whistleblowing: When It Works – And Why* 15, 19 (Lynne Rienner Publishers 2003)

⁵ The most well-known whistleblower movies are the 1973 film, "Serpico," the 1984 film, "Silkwood," the 1986 film, "Marie," and the 1999 film, "The Insider."

⁶ Gary Zingher, *Snitching*, School Library Media Activities Monthly January 2001, at 40. The ethical ramifications of snitching were also the theme in an episode of the 1950s television series, "Leave It to Beaver." *Leave It To Beaver* (ABC television broadcast, April 8, 1961).

⁷ Staff of Senate Subcomm. on Administrative Practice and Procedure of the Committee on the Judiciary, 98th Cong., *Examining the Role of Whistleblowers in the Administrative Process: Hearings Before the Subcommittee on Administrative Practice and Procedure of the Committee on the Judiciary* (November 14, 1983); Glazer, Myron Peretz & Penina Migdal Glazer, *The Whistleblowers* (Basic Books, Inc. 1989); Alford, C. Fred, *Whistleblowers' Broken Lives and Organizational Power*, (Cornell University Press 2001); Weisband, Edward & Thomas M. Franck, *resignation in Protest*, (Grossman Publishers 1975); Nader, Ralph et al., *Whistleblowing: The Report on the Conference of Professional Responsibility* (Grossman Publishers 1972); Michael Frome, *Blowing the Whistle on Waste*, Center Magazine, November-December 1978, at 50; Louis Clarke, *The Sound of Professional Suicide*, Barrister 5, Summer 1978.

⁸ Miceli, Marcia P., Near, Janet P.: *Blowing the Whistle: The Organizational and Legal Implications for Companies and Employees* (New York: Lexington books 1992) p. 187.

demonstrate that resistance from police departments and their retaliation against whistleblowers costs them and the public dearly.

The Character of Police Departments

Police departments display common organizational features.⁹ Daily, police officers in the field exercise autonomy and their own judgment without supervision and much oversight.¹⁰ The many quick judgment calls police officers are required to make are a matter of “art, not science” because of the often dangerous and confusing nature of the situations that officers face.¹¹ Dealing with a wide range of incidents, where “no two days work are ever the same,”¹² the patrol officer, either alone or with a partner, “must impose authority on people who are unpredictable, apprehensive, and often hostile.”¹³ “The number of different duties which a police officer may be called upon to perform is almost endless.”¹⁴

“Most of the time when an officer on patrol is summoned ... he or she can expect to encounter a situation in which great discretion must be exercised over matters of the utmost importance (life-and-death, honor and dishonor) involving frightened, drunk, quarrelsome, confused, angry, injured, evasive, or violent people.”¹⁵ Thus, when police officers “take charge” and try to restore order, they alone, have to decide who is telling the truth, who started the encounter, who is the victim, and who is the perpetrator. This is an organizational characteristic common to police work.¹⁶ The job is “unusually demanding and dangerous.”¹⁷

Lack of supervision is an important characteristic of this extraordinary exercise of autonomy. The discretion of police officers exercised on the streets is virtually free of control by superiors at the station house. And since, as James Q. Wilson suggests, “police work does not leave a paper trail,” patrol officers can use discretion “without worrying that each and every act will be reviewed.”¹⁸ The activities leading to their judgment calls often involve “a long, subtle, low-visibility process of interviewing victims, observing people, and questioning suspects,” all “in the absence of a supervisor.”¹⁹

Because management does not see any of this street corner activity or “output,” they do not know if a police officer spent the afternoon on a long and lazy break or if he spent it befriending youth and creating good police-community relations. Management may attempt to control police activities (output) by requiring increased record keeping

⁹ Wilson, James Q., *Bureaucracy: What Government Agencies Do and Why They Do It* 36-38 (Basic Books, Inc. 1989).

¹⁰ *Id.* at 37.

¹¹ *Id.*

¹² Ainsworth, Peter B., *Psychology and Policing in a Changing World* 146 (John Wiley & Sons 1995).

¹³ Wilson, *supra* note 9, at 37.

¹⁴ Ainsworth, *supra* note 12, at 146.

¹⁵ Wilson, *supra* note 9, at 37.

¹⁶ See generally James Q. Wilson, *Varieties of Police Behavior: The Management of Law and Order in Eight Communities* (Harvard University Press 1978) (exploring police behavior in eight American communities: Albany, Amsterdam, Brighton, Nassau County, Newburgh and Syracuse, New York, Oakland, California, and Highland Park, Illinois.)

¹⁷ Janny Scott, *Violence Born of the Group*, L.A. Times, March 28, 1991, at A26.

¹⁸ Wilson, *supra* note 9 at 41.

¹⁹ *Id.* at 327.

to measure police officers' productivity. This could mean requiring that they prepare more written reports, requiring that they issue more traffic tickets, or even that they make more arrests for "on view" offenses.²⁰ By requiring documentation, managers try to compensate for not being able to actually observe the "output" produced by their officers. Police officers sometimes resist, and always resent, the demands of management for more documentation. For the officers, it represents meaningless paperwork compared to their "real work." However, management's documentation requirements are reflective of how powerless management is in controlling police officers who work autonomously and unsupervised on the street.

To be sure, many police officers seem to understand the larger implications of their actions. William Ker Muir captures the moral underpinning of police work in his book *Police: Streetcorner Politicians*.²¹ Some of the Oakland, California police officers he studied developed their own moral benchmarks and a moral philosophy that helped them with their daily judgment calls.²² However, the officers' actions are most informed by their peer group.²³ For the patrol officer, group norms "control the quality and quantity of work itself."²⁴

"That groups develop and attempt to enforce norms about appropriate behavior is well documented."²⁵ This is particularly true in police work where, from day one, rookie cops experience peer group socialization. "Forget what you learned in the police academy,' veteran partners or sergeants will tell them. 'I'll show you what police work is really all about.'"²⁶ As retired Minneapolis police chief Anthony Bouza describes it, "the internal culture impinges importantly on new entrants."²⁷

According to Marcia P. Miceli and Janet P. Near, groups are particularly powerful when focal members are highly dependent on them, because they are "credible," they "provide... information," and "tasks are interdependent."²⁸ Police officers are dependent on their peers and they look to their peers for the information and guidance they need to succeed. The peer group provides on-the-job training. Officers tend to respond to values communicated in daily action "rather than from written policy."²⁹ The group norm defines what they should and should not do. The norms may even define right and wrong differently than a group member may believe in isolation.³⁰

The nature of police work also helps to define the group. Police bond "through the emotional glue of shared dangers" and because their "universe" so dramatically separates them from "civilians."³¹ One of the most respected tenets of the group is loyalty.

²⁰ *Id.* at 170.

²¹ Muir, William Ker Jr., *Police: Streetcorner Politicians* 189-224 (The University of Chicago Press 1977).

²² *Id.* at 263.

²³ Munro, Jim L., *Administrative Behavior and Police Organizations* 92-94 (W.H. Anderson Co. 1974).

²⁴ *Id.* at 92.

²⁵ Micelli, Marcia P. & Janet P. Near, *Blowing the Whistle* 144 (Lexington Books 1992)

²⁶ Wilson, *supra* note 9 at 32.

²⁷ Bouza, Chief Anthony V. (Ret.), *The Police Mystique* 52 (Plenum Press 1990)

²⁸ Miceli & Near, *supra* note 25, at 144.

²⁹ Bouza, *supra* note 27 at 49.

³⁰ Miceli & Near, *supra* note 25, at 144.

³¹ Bouza, Chief Anthony V. (Ret.), *Police Unbound* 202 (Prometheus Books 2001).

Loyalty is exacted with a code of honor that requires officers not to “snitch on,” “rat out,” or turn in other officers.³² A former police chief refers to it as a “veil of silence surrounding police agencies,”³³ and it has been more commonly referred to as the “Blue Wall.” The police officers’ respect for and loyalty toward their peer group encourages them to abide by the code of honor and to heed the obligation of silence. As Miceli and Near point out, “Group norms may interact with the power of the group to enforce norms.”³⁴ This Blue Wall of silence makes whistleblowing even more unlikely for police. In 1999, De Lacy Davis, a whistleblower from the East Orange, New Jersey police department, said that his department’s Blue Wall still remains alive even after millions saw his exposé of excessive police brutality featured on a television broadcast of “Nightline.” “The [Blue] Wall is not crumbling,” he said at the time, “It is just that some truth is able to seep through the bricks...”³⁵

Bribery, Excessive Force, and Unequal Treatment

Reported cases suggest that police whistleblowers are motivated to act because of a range of wrongful practices including the following three prominent examples: 1) using public office for private gain (bribery); 2) using excessive force; and 3) treating minority community members unequally to the non-minority members. Evidence of these problems is present in many police departments.

Using Public Office for Private Gain

Without doubt, the most publicized example of systemic police bribery is the New York police department in the 1960s and early 1970s. Plainclothes officer Frank Serpico, the most famous police whistleblower, alerted the public to the bribery. He exposed the practice of police officers using their positions to extract money and gifts. The story emphasizing his courage was popularized in the 1973 Hollywood film, “Serpico,” starring Al Pacino.

New York Police Detective Third Grade Frank Serpico was unique, according to his biographer Peter Maas. “He was the first officer in the history of the Police Department who not only reported corruption in its ranks, but voluntarily, on his own, stepped forward to testify about it in court.”³⁶

Serpico’s personal experience with the widespread police practice of using public office for private gain began when he received an unmarked envelope with \$300 in it from another officer. “It’s from Jewish Max,” the officer said, referring to a well-known gambler in the neighborhood.³⁷ Serpico brought the envelope to Captain Philip Foran, who was connected to the Department’s Chief Inspector’s Investigating Unit (CIU). To Serpico’s surprise, Foran warned him that if he went to the Commissioner, it would go

³² Muir, *supra* note 21.

³³ Bouza, *supra* note 27, at 47.

³⁴ Miceli & Near, *supra* note 25, at 144.

³⁵ Peter Noel, *Against the Blue Wall*, The Village Voice, July 14-20, 1999, at 21.

³⁶ Mass, Peter, *Serpico* 10-11 (Viking Press 1973).

³⁷ *Id.* at 128.

to a grand jury, word would leak out and “By the time it’s all over,’ he said, they’ll find you face down in the East River.”³⁸

Even without using the envelope with its damning contents as evidence, Serpico was able to provide information about rampant police corruption to a grand jury. But the grand jury did not reach beyond the street police to cast blame upon their supervisors, captains, lieutenants and the Chief for either being involved or for ignoring what was happening around them. Frank Serpico eventually took his story to reporter David Burnham of *The New York Times* with fellow whistleblower David Durk and two other officers. The meeting took place over two years after Serpico first brought the unmarked envelope to Captain Foran. The systemic nature of the police corruption still had not been addressed. The press changed that.

Starting on April 25, 1970, and for weeks afterwards, the police corruption story made New York front page news and ignited action by Mayor John Lindsay as well as by the NYPD. The scandal shook the city. The newspapers told of “gambling bosses, pimps, drug dealers and business people systematically paying officers and supervisors for protection or favors, and of the police and City Hall brass failing to act on ... evidence.”³⁹

New York was by no means unique in its experience of systemic corruption. Around the time this scandal was breaking, 30 police officers in New Orleans were charged with bribery and conspiracy to protect organized gambling and vice; in Seattle, 100 officers, including the assistant chief of police, were involved in a shakedown system; and in Boston, Washington D.C., and Chicago, a nationally funded study revealed that one out of every five officers “was observed in a criminal violation *even though they knew they were being watched*.”⁴⁰ In addition, Atlanta, Baltimore, San Francisco, Philadelphia, Newark, Louisville, Reno, Kansas City, Detroit, Reading, and Albany also experienced police department corruption scandals.⁴¹

Although there have been officers in other cities who have testified about corrupt police practices, Frank Serpico’s name has become synonymous with whistleblowing. The corrupt practice he confronted was bribery. It was pervasive in pattern and practice and was a problem that was systemwide. It took a prestigious investigative commission (the Knapp Commission), a cooperative mayor’s office, and daily exposure of the problem on the front pages of *The New York Times* to break the pattern of wrongdoing and indifference.

Use of Excessive Force

Another serious abuse of police power is excessive use of force. Appropriate use of force can, in many cases, be very difficult to discern, especially since the line that separates brave from brutal is thin. “[I]n the police world, the bravest are often the most brutal” and they are the ones most admired by other police officers.⁴² The cops “who

³⁸ *Id.* at 134-135.

³⁹ Joseph P. Fried, *Following Up*, N.Y. Times, May 27, 2001, at A31.

⁴⁰ Maas, *supra* note 36, at 140-141.

⁴¹ *Id.* at 140.

⁴² Bouza, *supra* note 31, at 18.

make the most collars and get the most action on the street, often have records marked by troubling signposts of brutality, ... citation records, and medals for heroism.”⁴³

Nevertheless, however difficult it may be to define excessive force, many surveys of police departments across the country reveal that there is a problem with the amount of force that some officers use. In May 2000, the National Institute of Justice, an agency in the U.S. Department of Justice, published research findings related to the use of force. The report “Police Attitudes Toward Abuse of Authority: Findings from a National Study,” was based on a survey of 925 randomly selected American police officers in 121 departments.⁴⁴

The survey revealed that nearly 22 percent of police respondents reported that officers in their departments (sometimes, often, or always) were using more force than necessary.⁴⁵ The report also referred to an Illinois study that found that 20 percent of police officers said they observed police using considerably more force than necessary, and an Ohio study that found that 13 percent of police officers reported that they had observed police using considerably more force than necessary.⁴⁶ In its published findings, the National Institute of Justice also reported on older studies. A re-examination of 1977 national data involving 5,688 cases revealed that police used improper force in 38 percent of encounters that involved force. Similarly, a re-examination of 1967 data based on 1,565 cases revealed that police used excessive force in 35 percent of those police encounters that involved force.⁴⁷

Differential Treatment of Minorities

A third kind of misuse of power by police relates to the differential treatment of citizens. The same National Institute of Justice report found a wide difference of opinion on how equally citizens are treated. When surveyed, the police said that unequal treatment was a problem that depended on race. As to whether police officers were more likely to use physical force against blacks and other minorities than they used against whites in similar situations, 5.1 percent of white officers believed there was such unequal treatment; 57.1 percent of black officers believed there was unequal treatment; and 12.4 percent of other minority officers believed there was such unequal treatment.⁴⁸ On occasion, minority police officers have come forward as whistleblowers, sometimes in groups, to expose differential police treatment to journalists eager to inform the public. However, most of the time, police respect the code of silence.

Addressing the Problem

How do police officers think the problem of corruption and abuse of power should be addressed by police departments? Overwhelmingly, surveyed officers seemed

⁴³ *Id.* at 19.

⁴⁴ David Weisburd et al., *Police Attitudes Towards Abuse of Authority: Findings from a National Study*, Nat'l Inst. Of Justice Research in Brief (U.S. Dept. of Justice Office of Justice Programs, Washington, D.C.), May 2000, at 1., available at <http://www.ncjrs.gov/pdffiles1/nij/181312.pdf>.

⁴⁵ *Id.* at 3.

⁴⁶ *Id.* at 2.

⁴⁷ *Id.* at 2, 3.

⁴⁸ *Id.* at 8, 9.

to believe that the answer lay in good supervision. In National Institute of Justice focus groups, 90 percent thought first-line supervisors might be critical and “effective role models” for reducing the inappropriate behavior and 55 percent “agreed that most abuse could be stopped with more effective methods of supervision.”⁴⁹

The use of effective supervision to prevent and stop inappropriate and dangerous police behavior would seem like an attractive and obvious solution. However, to depend upon supervision to reduce abuse may be naive in light of the fundamental organizational characteristics of police departments. As already described, policing is characterized by its autonomy and a lack of supervision.

Supervision and oversight, therefore, would not be a realistic and reliable solution to the problem of police abuse. Supervisors generally cannot see the abuse and, therefore, they cannot correct abuse. Usually, fellow officers are the only witnesses present. As such, the responsibility should fall on the officer witness’ shoulders to come forward to report the wrongdoing. But here again, the character of police departments prevents this from happening. As described earlier, police officers are highly dependent on and loyal to their peers. Officers are expected to remain silent.

Even those troubled by what they see remain silent. Although 80 percent of officers surveyed said that they did not accept the “code of silence,”⁵⁰ 61 percent said that police officers “do not always report even serious violations by fellow officers.”⁵¹ The National Institute of Justice Research suggests that the “culture of silence ... continually plague[s] the reform of American policing.” Indeed, of those surveyed, 24.9 percent thought whistleblowing was not worth it; 67.4 percent said whistleblowers were likely to be “given a cold shoulder;” and 52.3 percent did not think it unusual for police officers to “turn a blind eye.”⁵²

Retaliation

Penalties for whistleblowers can be harsh. As Bouza describes it, “the full force of the agency, formal and informal, is brought to bear on the ‘snitcher’”⁵³ “Rats are scorned, shunned, excluded, condemned, harassed, and almost invariably, cast out. No back-up for them. They literally find cheese in their lockers.”⁵⁴ Case after case offer evidence of harsh retaliation.

For example, in 1998, in Washington, D.C., five police whistleblowers testified at a special Council Committee hearing investigating alleged police misconduct regarding the retaliation they experienced after exposing illegal and improper action. The police officers “who complain about supervisors or publicly criticize departments,” *The Washington Post* reported, “end up on a ‘hit list’ that can result in unwanted transfers, a dock in pay, unfavorable assignments and other retaliatory measures.” Evidence that supports the fact that police assignments were affected by whistleblowing is that the 7th

⁴⁹ *Id.* at 6.

⁵⁰ *Id.* at 3.

⁵¹ *Id.* at 3, 5.

⁵² *Id.* at 3, 5, 11.

⁵³ Bouza, *supra* note 27, at 50.

⁵⁴ Bouza, *supra* note 31, at 18.

police district in southeast Washington is known as the “dumping ground” for “problem officers.”⁵⁵

In the early 1990s, in New York City, the mayor convened the Mollen Commission to investigate police corruption. After cooperating with the Commission, police detective Jeffrey Baird, an Internal Affairs investigator with NYPD, experienced a range of retaliation. For example, he was sent obscene materials to his house, his workstation was vandalized, he was denied promotion,⁵⁶ and he received threats to his life.⁵⁷

In Pomona, California, in 1995, police officer Jed Arno Blair alleged that other officers stole money and planted drugs on suspects. His allegations eventually led to the firing of three officers. (Two were reinstated.) Blair himself suffered retaliation for coming forward. He specifically described his colleagues stealing his equipment, interfering with his radio calls, threatening to kill him and his family, and scrawling the word “rat” on his locker. He said “his locker was spat in and wired shut with a coat hanger ... his shirts were dumped in a urinal and soda was poured into his patrol car.” Blair’s “complaints were ignored and he was transferred to the very task force he exposed.” “The day the three officers were dismissed,” his wife, he said, “got a phone call warning that her husband might come home with broken legs” and that they wanted to get rid of the whole family.⁵⁸

Also in California, in August 2000, more than 40 current and former Los Angeles police officers filed a class-action lawsuit alleging that they had been retaliated against because they had reported police wrongdoing. The officers believed they were victims of retaliation for “reporting incidence of excessive force, hostile work environment issues and other forms of police misconduct.” The retaliation included “personnel complaints, undesirable job assignments, demotions and terminations.” Many said they were forced out of the police department “because they reported police abuses to their supervisors.” The attorney representing the police officers suggested that “these good cops fear their own administration and management more than the criminals on the street.” He said that managers “secretly passed along confidential information about a whistle-blower’s [sic] background to other managers to perpetuate the harassment of the employee. The practice was known as a ‘phone jacket.’”⁵⁹

The Costs of Retaliation

The police practice of informally or officially punishing whistleblowers has a great negative impact upon society. It impacts the police because their unwillingness to support whistleblowers means they lose their best source of information on corrupt practices.⁶⁰ Fellow police officers, as we have seen, are usually the only witnesses to

⁵⁵ Cheryl W. Thompson, *D.C. Police Officers Complain of Retaliation; Five Tell Council Committee of Docked Pay, Bad Assignments for Speaking Out*, Washington Post, February 27, 1998, at B1.

⁵⁶ Michael Cooper, *New Plan to Protect Whistle-Blowers*, N.Y. Times, November 26, 1998, at B4.

⁵⁷ Jaime Adame, *Police Whistleblowers*, Gotham Gazette, at <http://www.gothamgazette.com/article/crime/20040602/4/995> (June 2004).

⁵⁸ Richard Winton, *Police Whistle-Blower’s Suit Reinstated*, L.A. Times, March 23, 2000, at B3.

⁵⁹ Matt Lait & Scott Glover, *LAPD Sued By Whistle-Blowers*, L.A. Times, August 25, 2000, at B1.

⁶⁰ The New York Knapp Commission in 1968, as a result of the police corruption scandals, offered some key recommendations including, “creating a system of field associates in which officers voluntarily and

wrongful behavior. Discouraging them from acting responsibly and from coming forward promotes wrongdoing and further supports the wrongdoers.

In addition, a strong argument can be made that it is in the self-interest of police departments to accommodate police whistleblowers. Whistleblowers allow problems to be detected and addressed *in-house*. But if whistleblower concerns are not heard, the problems may fester, grow, and explode into a scandal. By default, it will be left to outsiders, like grand juries, special commissions, investigative reporters, and irate citizens to expose and address police abuse while publicly embarrassing the departments. And in our complex world, even drug dealers can play the role of the “irate citizen” and cause a scandal. In 1986, according to David Durk, corrupt police officers stole money and drugs from drug dealers. The drug dealers complained to their probation officers about the theft and their complaint triggered a grand-jury investigation of police wrongdoing.⁶¹

Society at large also pays a price for police whistleblower retaliation. Although wrongful behavior is not the norm in policing, nevertheless, the department pattern of ignoring the message of dangerous and illegal police practice and punishing the messenger who reports it increases danger to the larger community. It leaves the wrongdoers unchanged and unchecked. This has serious implications when we are asked to trust the police to protect our safety and to preserve our rights and our property.

In the fall of 2000, 70 police officers in the Los Angeles Rampart Division were under investigation by federal and state prosecutors for serious wrongdoing. They were accused of police misconduct “ranging from planting evidence to shooting unarmed innocent people.” But only a handful could be charged because the officers who knew of the dangerous activities were not coming forward. What was the most serious cost to the community? The bad apples continued policing unscathed.⁶²

There is an additional social cost. The pattern of retaliation encourages police officers who have been whistleblowers and have experienced retaliation to use the courts and councils to collect compensation for the harm it has done to them. This is not an argument against such settlements. Many whistleblowers should be compensated. They have had their lives ruined and their careers destroyed all because they were public servants who acted responsibly.

In the mid-1990s, New Jersey police officer Richard Rivera, “ignited the largest police corruption investigation in New Jersey history.” It resulted in indictments of 34 people in West New York, 22 of them, including the police chief, pled guilty. Mr. Rivera began the process with a call to the FBI. He assisted in the investigation for 18 months by wearing a body wire and posing as a corrupt cop. When his role was exposed, he was threatened, had to move many times, and was dismissed from his job. In 1998, he sued the town of West New York for \$17 million in damages and for his job back.⁶³

confidentially report on suspected wrongdoing in their precincts.” Martin Gottlieb, *13 Police Suspensions: Lessons of '68*, N.Y. Times, September 25, 1986, at B4.

⁶¹ Robert O. Boorstein, *Ex-Officer Calls Corruption on Police Force Wide-Spread*, N.Y. Times, October 6, 1986, at B2. In another article, this case was characterized differently and the police department itself was credited with uncovering the corruption. See Gottlieb, *supra* note 60.

⁶² Charles Feldman, *Officer Breaks LAPD's 'Code of Silence'*, CNN, at www.cnn.com/2000/LAW/09/20/LAPD.robby/ (September 21, 2000).

⁶³ Alan Feuer, *Outcasts at the Blue Wall: Virtue Is Cold Comfort for Police Who Inform on Peers*, N.Y. Times, December 30, 1998, at B1.

