

Paul D. Linnée, ENP

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PROFESSIONAL EXPERIENCE:

2008: Awarded "Life Member" status by the Association of Public Safety Communications Officers (APCO)

2005 to present: Principal in my own firm (*Emergency Communications Strategies*) engaging in consulting services to:

- ▶ County and city governments dealing primarily with issues surrounding the organization, management, funding, governance and potential consolidation of 911 dispatch centers, as well as the planning and acquisition of large, regional shared trunked radio systems.

- ▶ The legal community, as an expert witness in cases where analysis, timeline and decision reconstructions are required in litigation flowing from the processing and dispatch of 911 calls and related issues.

1996 to 2005: Consulting Services Director/co-owner GeoComm Corporation:

Overall management and expertise, sales and project coordination work, serving as Managing Consultant on numerous large wired and wireless Enhanced 911 and public safety communications projects for a firm with 80+ employees and \$6,000,000+ in annual sales.

1997: Awarded 9-1-1 Emergency Number Professional ("ENP") certification: By the National Emergency Number Association (NENA) after completing an exhaustive testing process and receiving the highest score. Subsequently qualified for ENP Certification renewal in 2002 and 2007, and awarded ENP-R (retired) status in 2010..

1996 to now: Consultant, Emergency Communications and 911 Incident Issues:

Service to a variety of clients on design and implementation of Enhanced 911 and public safety radio systems. Clients included GeoComm Corp. of St. Cloud, MN (a 911/radio and GIS mapping consulting firm of which I later became part-owner); Douglas Co. NE (Omaha); St. Clair Co. IL (East St. Louis); State of Virginia Wireless 911 Board, for whom I am managed an 18 county wireless 911 implementation project; MCImetro (*MCI's local competitive dial tone arm*) and Winstar Telecommunications for whom I did E911 network design engineering and political/operational interface for integration of their local loop service to existing E911 networks.

1994-96: Telident, Minneapolis, MN: Director, Industry Relations: Manage industry relations for a \$2 million emerging technologies company specializing in telecommunications and data services for the Enhanced 911 and public safety communications marketplace, including CAD, Law Enforcement and Fire Records, Jail Management, Digital Video Imaging and a broad range of Private Safety Telecommunications products and services directed at the PBX and Centrex user market. Solely responsible for development, market research, advertising and vertical marketing of a new subscription service for simultaneous broadcast voice & pager notification.

1985-1994: City of Minneapolis, MN: Director, Emergency Communications (911):

Department head status in city government, providing overall management and direction to the \$4.3 million annual budget Department of Emergency Communications providing 911 call answering, police and fire dispatching for the entire city of 400,000, handling 800,000 calls for service per year and dispatching 450,000 police, fire and EMS events annually. Supervised 100+ staff and 13 subordinate managers. Designed and implemented major CAD (Computer Aided Dispatch) system, 800 MHz. trunked radio, 220 device Mobile Data Terminal (MDT) System. Elected and re-elected as Chair of Metro 911 Telephone Board's Operations Committee. Primary initiator of Twin Cities Regional 800 MHz. trunked radio system task force, whose work resulted in the implementation in 2000 of the largest integrated local governmental trunked radio system in the USA, known as the Minnesota Metro system.

1975-1985: Richfield, MN, Public Safety Dep't. Director, Administrative Services

Division head in 100 member full service public safety organization with police, fire, emergency preparedness and inspections divisions. Overall responsibility for budget, physical plant, purchasing, city-wide communications, data processing, 911 system design and acquisition, dispatching and records. Designed and implemented a rudimentary CAD and records system as early 1978. Major involvement in design and implementation of total Metro E911 system in 1982.

1973-1975: MN Governor's Crime Commission. Team Leader, Police Planning:

Leader of a 4 person Police Planning Team which solicited and then reviewed and monitored grant applications

and funded projects for \$4 million in annual federal Law Enforcement Assistance Administration (LEAA) grants.

1970-1973: Burnsville, MN, Public Safety Dep't. Police & Fire Supervisor I: Police patrol officer and firefighter in fully consolidated suburban public safety department until 1972 when promoted to Police Sergeant and Fire Captain. General police and fire response and supervisory duties. Implemented Minnesota's first full time Crime Prevention Officer position.

EDUCATION: Graduated University of Minnesota, B.A. (Journalism & Communications), 1970 Licensed and certified (State of MN) as a Police Officer from 1970 to retirement in 1994.

PROFESSIONAL ACTIVITIES: 38 year "Life Member" and former officer of Minnesota and International A.P.C.O. (public safety communications professional association). Member, APCO's National 911 Committee; President (3 terms) of the MN Chapter of NENA (National 911 group). Member of a variety of other public safety organizations.

SKILLS AND STRENGTHS: Experienced and successful sales experience to local government. Experienced and successful consulting management of large land-mobile communications system projects for local and regional governments:

- Consultant to **Scott County, IA (Davenport & environs)** on long range radio system plan development.
- Consultant to Cook Co. (**Chicago**) **IL** on local government interoperable communications planning
- Lead Consultant to Lubbock County, (**Lubbock**) **TX** on study of merging 5 911 dispatch centers.
- Lead Consultant to Stark County, (**Canton**) **OH** on study of merging 11 police, fire and 911 dispatch centers.
- Lead Consultant to Montgomery Co. (**Dayton**) **OH** on study of merging seventeen 911 dispatch centers.
- Lead Consultant to City of **Atlanta**/Fulton County GA 911 on a 911 dispatch consolidation study
- Lead Consultant to **Omaha**/Douglas Co. NE \$19 million 20 channel digital, P25 trunked radio system
- Lead Consultant to St. Clair County, IL (East St. Louis) on a 10 site, P25 digital trunked radio system as well as the implementation of the USA's 1st Wireless Enhanced 9-1-1 (Phase 2) system.
- Managing Consultant to Anoka Co. MN on a 9 site, 10 channel add-on to Minnesota Metro radio system
- Lead Consultant to **Washington Parish, LA** 911 district on merging of three 911 dispatch centers.
- Managing Consultant to St. Cloud/Stearns Co. MN on a 5 channel 3 site add on to the MN Metro system
- Lead Consultant to Mid America Regional Council (**Kansas City** regional planning agency) for Assessment of Public Safety Communications Interoperability and Recommendations.
- Lead Consultant on 911 dispatch merger studies for **Merced** and **Tulare Counties in California**.
- Lead Consultant: **St. Louis Co., MO** on pre-planning \$85 million county-wide 700 MHz trunked radio system.
- Lead Consultant, **Long Beach, CA** studying the merger of separate police & fire 911 centers and operations.
- Lead Consultant: **State of Minnesota**, Conduct assessment and prepare report on performance of regional 800 MHz trunked radio system during 8/1/2007 Interstate 35W freeway bridge collapse incident.

Well developed "public process" facilitation skills geared at enabling non technical public entity user groups to understand the technologies and public policy aspects of such technologies as shared, regional voice and/or data radio systems, and to be effective participants in their planning and implementation. Also, experienced in research into and testimony on complex legal matters relating to the electronic and procedural processing of emergency communications dispatch events. Well received public speaker, presenter and instructor, considerable court testimony experience. Widely published author of numerous articles in professional journals. (APCO Bulletin, NENA News, 911 Magazine, Dispatch Monthly, etc.) Also author of widely sold (in public safety circles) book **"ICK! I Hate Technical Stuff"** which is renowned for explaining highly technical public safety communications issues and technologies to "lay" audiences.

Relevant litigation experience for Paul Linnee:

Lugo v. New York City (*For plaintiff*): Alleged improper response by NYC EMS service to a 911 call for a medical emergency

Porche v. City of Chicago (*For plaintiff*): Alleged improper 911 call processing by the Chicago PD resulting in a delayed response and homicide death of child

Dedman v. Gibraltar Insurance, *(For defense)*: Case involved 911 calls and related dispatch activities surrounding a freeway crash fatality of a Metro Nashville, TN police officer

Regensberg v. City of Albuquerque, NM, *(For plaintiff)*: Regarding delayed police response to a double homicide/suicide

Wilson v. City of Jersey City, NJ, *(For plaintiff)*: Delayed police response to a triple homicide/attempted murder

Donovan v. Bureau Co. IL 911 Board, *(For defense)* Involved assisting in defense of allegations that failure of radio paging equipment procured by 911 Board resulted in the death of fire fighter

Mevers v. City of Los Angeles, CA *(For plaintiff)*: Involved failure to dispatch an ambulance to fatal drug overdose

Wilson v. City of Memphis, TN, *(For plaintiff)*: Involved no dispatch of an ambulance, resulting in the death of a child

Rice v. Collins Communications, Comm Tech and Campbell County, WY *(For plaintiff)*: Involved installation and maintenance failures in radio paging system for fire departments

Thomas v. Bell South, et al *(For plaintiff)*: Involved allegations of improper implementation of Enhanced 911 and rural addressing in Cameron Parish, LA, resulting in a delayed ambulance response and fatality

Boyd, Young & Young v. Nicholas & Clay Counties, WV 911, *(For defense)*: Allegations of delayed police response to shooting(s)

Crudup v. WGK and Intrado Inc. *(For plaintiff)*: Alleged failed EMS response due to improper addressing & 911 call routing in suburban Jackson, MS.

Munich v. Skagit County WA 911, *(For plaintiff)*: Alleged delayed police response to shooting in progress resulting in homicide.

Carvalho v. Pawtucket, RI: *(For plaintiff)*: Alleged that local fire dispatch made errors resulting in dispatching EMS to wrong location, resulting in fatality.

Lichaw v. City of Chicago, IL et al, *(For plaintiff)*: Involves rebuttal expert testimony in complex six-fatality, high-rise fire in downtown Chicago office building relating to performance of fire department communications center and staff

Nicolet v. Alton, IL, *(For plaintiff)*: Involves delayed EMS dispatch

Johnson v. Town of Vail, CO, *(For defense)*: Allegations of Federal civil rights violation flowing from entry on premise by police following a 9-1-1 “hang-up” call

McQuarrie v. Town of Bristol, CT, *(For defense)*: Involves assisting defense of city police department against allegations of improper processing of medical emergency 911 call

Livengood v. Preston County WV 911, *(For defense)*: Involves assisting defense of County 911 agency against allegations relating to delayed response to a verbal dispute that escalated to a shooting and homicide

Garcia v. Flagstaff PD and State of Arizona: *(For plaintiff)*: Involves allegations of improper police procedure in reporting police shooting and summoning EMS assistance.

Phillips v. Northwest Dispatch PA: *(For Plaintiff)*: Involves allegations of civil rights violation by 911 center and one of its employees resulting in a triple homicide committed by 911 dispatcher

Hopkins v. Town of Clinton CT: *(For plaintiff)*: Involves allegations of 911 dispatcher misconduct for encouraging or permitting an off duty volunteer fire-fighter who had called 911 to pursue a hit and run car that struck him, allegedly resulting in a crash of the hit and run car seriously injuring three parties, all occupants of the car, one of which is Hopkins.

Smiley v. Liberty County, GA: *(For plaintiff)*: Alleged that 911 dispatcher gave bad or inadequate medical advice to 911 caller.

Johnson v. Plant City, FL: *(For defense)*: Involves defending the city against allegations that they mishandled a wireless 911 call from a car trunk and the caller subsequently died (homicide).

Gebo v. Town of Old Saybrook, CT: *(For plaintiff)*: Alleged that ambulance was not dispatched despite 911 call.

Lain v. Metro 911, Charleston WV: *(For defense)*: Alleged that ambulance response was delayed due to dispatch errors.

Bonfil v. City of Phoenix, AZ: *(For plaintiff)*: Alleged that improper police pursuit was causal factor in fatal crash.

Cereceres v. Maricopa Co. AZ Sheriff: *(For plaintiff)*: Alleged that improper police pursuit was causal factor in fatal crash.

Ahmad v. State of AZ, City of Chandler, et al: *(For plaintiff)*: Alleged that improper police pursuit of a bank robber (and radio communications employed or not employed therein) resulted in fatal crash.

Hinds County, MS v. Motorola Solutions, Inc.: *(For the plaintiff)*: Alleged that Motorola had permitted unauthorized access by other governmental agencies to a radio system owned and operated by Hinds County but provided and maintained by Motorola.

Reger v. Putnam County, WV: *(For defense)*: Alleged that 911 errors in radio dispatching caused delayed response to medical emergency.

Taber et al v. Town of Burrillville RI, et al: *(For Plaintiff)*: Alleged that equipment failures in radio dispatching (paging) of two volunteer fire departments by the Town’s police department led to death due to delayed response.

Baker/Schwartz v. Gwinnett County GA: *(For plaintiff)*: Alleged that improper dispatching by County police department caused for improper police response resulting in shooting death of 2 victims.

Moreno v. Brownsville, TX: *(For plaintiff)*: Alleged that police dispatcher falsified information in a radio dispatch to police cars resulting in a “SWAT” stand-off and the killing of an innocent person.

Sheehan v. North Haven, CT: *(For plaintiff)*: Alleged the police department committed errors in their dispatching of the local fire department to a fatal house fire.

Johnson v. Monongalia Co. WV: *(For plaintiff)*: Alleged that county 911 dispatchers failed in their duty to a caller by misleading the caller (who was reporting a shortness of breath situation, which resulted in a fatality) into believing that an ambulance was on the way, when one was not, among other alleged errors and procedural violations.

Powers v. Hardin County & Radcliff, KY: *(For plaintiff)* Alleged that County 911 operator and city police dispatcher made errors in handling and dispatching medical emergency call resulting in a fatality.

Hester v. Maricopa County AZ: *(For plaintiff)*: Alleged that pursuing deputy sheriffs engaged in reckless activity. My role is in the analysis of radio communications and establishing a timeline.

Sidell v. Comcast (Palm Beach County, FL): *(For plaintiff)*: Alleged that Comcast telephone service “O” (Operator) failed in her duty to properly connect an emergency call dialed to “0” to the proper local dispatch center and in failing to pass on the actual address from where the subscriber was calling, resulting in a fatality.

United States v. Robbins Criminal narcotics case in Cedar Rapids, IA: *(For defense)* Interpret the data associated with a land-line Enhanced 9-1-1 call’s Automatic Location Information (ALI) to determine if there existed probable cause to support a police response to a residence, when the E911 caller’s “class of service” was displayed in the ALI as business.

Tellez et al v. Canadian National Railroad, Illinois Central Railroad & Chicago Central & Pacific Railway, *(For defendants)*. Alleged that railroads engaged in negligent practices in receiving and reacting to information received from local emergency services in Illinois in which a water-on-the-tracks or washout situation had occurred on their track following a heavy rainstorm, resulting in a derailment with a fatality.

Mallory v. McDowell County, WV *(For the defense)*. Alleged that County 911 dispatchers erred in their handling of an assault call they passed on to the State Police, in which the initial caller was killed.

Coleman v. Orland Park (IL) Fire District, *(For the defense)* Alleged that dispatch center was negligent in processing and assigning a medical emergency call to an ambulance.

Numerous (12) Plaintiffs v. State of Washington and Skagit County WA 911 *(For the plaintiff)*. Alleged that County 911 dispatch staff erred in processing the assignment of a Deputy Sheriff to a mental health incident which resulted in the Deputy being killed and 7 other victims being killed as well, plus several other persons injured by deranged subject who allegedly should already have been in custody of the State. (Commonly referred to as the Isaac Zamora case).

Thompson v. Torrance County, New Mexico *(For the defense)*. Alleged that County 911 dispatcher mishandled a 911 call reporting a naked woman and naked baby walking along a desolate highway at 3:30 a.m. on a cold night. Call was passed on to State Police handling and then did not find the woman/child that night. Woman was later found naked but alive, child was found even later dead in the high desert.

Fitzgerald v. Teton Counties in Wyoming & Idaho: *(For the plaintiff)*. Alleged that two County Sheriff’s 911 centers mishandled calls from the cell phone of a lost skier in the Teton Basin ski area, thereby denying the caller the opportunity to be located by rescue teams, and the caller died.

Carrasco v City of Glendale, AZ: *(For the defense)*. Alleged that city 911 dispatchers in Glendale and abutting Phoenix made errors in deciding that a set of stop lights at a given shared intersection were the responsibility of Maricopa County and neither city, meaning that non-functioning stop lights went un-repaired, and a fatal collision occurred.

Moore v Shields & City of Philadelphia, PA: *(For the plaintiff)*: Alleged that dispatch errors caused for police officer to respond and react improperly resulting in the non-fatal shooting of resident in a home.

Barnett v City of Atlanta, GA: *(For the plaintiff)*: Alleged that dispatch errors in responding to a medical emergency in a school caused for responding Fire/EMS units to be inappropriately canceled.

Evans v Alabama Power Co: *(For the Plaintiff)* Alleged that defendant failed to respond in a timely and proper manner to a notification from emergency services that their services were needed at a personal injury auto accident, with said delay resulting in a death.

Rates and Fees:

- For communications consulting projects, fees subject to negotiation.
- For Expert Witness research, report preparation and testimony: \$225 per hour or \$1,500 per day (whichever is less), plus any travel expenses.