



DISCRIMINATION AND HARASSMENT SOLUTIONS LLC

June 3, 2026

INVESTIGATION OF ALLEGATIONS OF MISCONDUCT BY ROBERT PISTONE, JR. AND STEPHEN DOHERTY FINDINGS OF FACT AND CONCLUSIONS

I. SCOPE OF INVESTIGATION AND SUMMARY OF ALLEGATIONS AND DEFENSES

On or about October 8, 2025, and October 10, 2025, Haverhill Mayor Melinda Barrett received complaints concerning the conduct of former Haverhill Police (“HPD”) Chief Robert Pistone, Jr., and Deputy Chief Stephen Doherty. (Exhibit 1) Most of the complaints stem from the alleged mishandling of the much-publicized incident involving Francis Gigliotti, who died during an HPD arrest attempt on July 11, 2025 (“the Gigliotti incident”).¹ Thereafter, the seven HPD officers involved in the arrest were placed on paid administrative leave while the Essex County District Attorney’s Office investigated the incident. On September 5, 2025, the State Medical Examiner determined that Mr. Gigliotti’s death was a “homicide” caused by “cardiac dysrhythmia in a person with acute intoxication due to the combined effects of cocaine and ethanol while being restrained ... by police.” (Exhibit 1) This finding heightened concerns that the seven officers might face criminal charges for excessive force.² On January 27, 2026, the Essex County DA’s Office announced that it concluded that officers acted in accordance with training and in the interest of public safety, with no criminality found in their actions.

On September 26, 2025, Katelyn Tully, one of the seven HPD police officers on leave, died unexpectedly at her home. [REDACTED]

[REDACTED] Her death caused significant grief within the HPD and fueled complaints concerning the leadership of Chief Pistone and Deputy Chief Doherty. These complaints included allegations that Chief Pistone and the Deputy Chief: (1) lacked support/empathy for the suspended officers; (2) falsely claimed that the Mayor and/or DA precluded them from making statements in support of the officers involved in the Gigliotti incident; (3) retaliated against officers for challenging their decisions; and (4) made inappropriate and/or offensive comments to the officers. [REDACTED]

[REDACTED] (Exhibits 1 and 68)

¹ Video of the Gigliotti arrest is linked to Exhibit 1. It depicts Mr. Gigliotti acting erratically and weaving on foot through traffic before HPD officers restrained him at the entrance of Bradford Seafood on Winter Street. Shortly thereafter, Mr. Gigliotti became unresponsive and later died.

² The seven officers involved in the Gigliotti incident have not been charged and have returned to work. (Interview of S. Doherty)

Chief Pistone recently resigned from the HPD, effective October 9, 2025, and has since stated, through counsel, that he will not participate in this investigation. (Exhibit 2) Deputy Chief Doherty is currently on paid administrative leave (Exhibit 39) and has participated in this investigation. Deputy Chief Doherty contends that, if the misconduct complained of occurred, it was carried out by Chief Pistone, his superior, and that he denies any personal violative conduct. (Interview of S. Doherty)

On or about October 10, 2025, the City of Haverhill retained Discrimination and Harassment Solutions, LLC to determine whether former Chief Pistone and/or Deputy Chief Doherty violated the policies and procedures of the City and/or the HPD. (Exhibits 66 and 68)

II. EVIDENCE CONSIDERED⁵

A. WITNESSES INTERVIEWED:

[REDACTED]

⁵ All witnesses and evidence were accessible for this investigation. All witness interviews were recorded and preserved. 555 CMR 1:01(3)(d)

⁶ During the course of this investigation, Wayne Tracy was named Acting Chief of the HPD.

B. DOCUMENTS RELIED UPON:

Exhibit 1	Timeline of Events and Allegations
Exhibit 2	Letter from Chief Pistone's Counsel Regarding his Testimony
Exhibit 3	[REDACTED]
Exhibit 4	[REDACTED]
Exhibit 5	[REDACTED]
Exhibit 6	[REDACTED]
Exhibit 7	[REDACTED]
Exhibit 8	[REDACTED]
Exhibit 9	Confirmation of Deleted Posts
Exhibit 10	[REDACTED]
Exhibit 11	Press Release from HPD Patrolman's Association
Exhibit 12	Patrolman's Association Approval of "Anonymous Letter"
Exhibit 13	Continuation of Exhibit 12 (Second Page)
Exhibit 14	"Anonymous letter" 1 of 4
Exhibit 15	"Anonymous letter" 2 of 4
Exhibit 16	"Anonymous letter" 3 of 4
Exhibit 17	"Anonymous letter" 4 of 4
Exhibit 18	Missed Call from Chief Pistone (10.6.25 @ 5:06 PM)
Exhibit 19	Outgoing Call Chief Pistone (10.6.25 @ 5:10 PM)
Exhibit 20	Missed Call from Chief Pistone (10.6.25 @ 6:30 PM)
Exhibit 21	Text Exchange with Chief Pistone
Exhibit 22	Administrative Leave Letter to Chief Pistone (10.9.25)
Exhibit 23	Attachment A to Superior Officers Group Contract (Drug Policy)
Exhibit 24	Attachment B to Superior Officers Group Contract (Injured-on-Duty Policy)
Exhibit 25	Attachment C to Superior Officers Group Contract (Parental Leave Policy)
Exhibit 26	Amendment to Chief Pistone's Contract (Vacation Days) (9.6.25)
Exhibit 27	Memorandum of Agreement Chief Pistone's Contract (Extension) (4.11.24)
Exhibit 28	Employment Contract of Chief Pistone (8.3.21)
Exhibit 29	[REDACTED]
Exhibit 30	Memorandum of Agreement DC Doherty's Contract (Extension) (4.9.24)
Exhibit 31	Employment Contract of DC Doherty (8.24.21)
Exhibit 32	Employment Contract of DC Doherty (5.6.21)
Exhibit 33	[REDACTED]
Exhibit 34	Email of Capt. Pistone Regarding Officer Wellness Position (6.7.21)
Exhibit 35	Job Description for Officer Wellness Position (6.10.21)
Exhibit 36	Email Regarding Officer Wellness Position (1.6.22)
Exhibit 37	Memorandum of Agreement with Patrol Association
Exhibit 38	[REDACTED]
Exhibit 39	Administrative Leave Letter to DC Doherty (10.10.25)
Exhibit 40	[REDACTED]

Exhibit 41	[REDACTED]
Exhibit 42	Labor Agreement with Patrolman's Association
Exhibit 43	Memorandum of Agreement with Patrolman's Association (undated)
Exhibit 44	HPD Officer Wage Scale (undated)
Exhibit 45	HPD Officer Wage Scale (undated)
Exhibit 46	HPD Officer Wage Scale (undated)
Exhibit 47	HPD Officer Wage Scale (undated)
Exhibit 48	Labor Contract of Superior Officers (2025-28)
Exhibit 49	[REDACTED]
Exhibit 50	Blue Team Chain Routing (8.21)
Exhibit 51	Cell Phone Text Records of DC Doherty
Exhibit 52	Screenshot of Calls (10.7.25)
Exhibit 53	Screenshot of Call with Chief Pistone (10.7.25)
Exhibit 54	Records from DC Doherty's Phone
Exhibit 55	Texts between Chief Pistone and DC Doherty
Exhibit 56	Texts of Chief Pistone
Exhibit 57	Texts of Chief Pistone Regarding Pride Month 1 of 2
Exhibit 58	Texts of Chief Pistone Regarding Pride Month 2 of 2
Exhibit 59	IACP Conference Receipts
Exhibit 60	[REDACTED]
Exhibit 61	[REDACTED]
Exhibit 62	[REDACTED]
Exhibit 63	HPD Policy and Procedure 22.2.3 (Health and Wellness)
Exhibit 64	Patrolman's Association Endorsement of Wayne Tracy for Chief
Exhibit 65	Patrolman's Association Press Release Regarding Gigliotti Incident
Exhibit 66	Affidavit of Mayor Barrett (11.4.25)
Exhibit 67	Mayor Barrett's Letter to HPD Regarding Katelyn Tully's Death
Exhibit 68	Labor Counsel's Announcement Regarding This Investigation (10.27.25)
Exhibit 69	"Anonymous Letter" Sent from voicesofthebadge@proton.me
Exhibit 70	HPD Rules and Regulations Manual (5.28.24)
Exhibit 71	Second Email from voicesofthebadge@proton.me
Exhibit 72	[REDACTED]
Exhibit 73	[REDACTED]
Exhibit 74	HPD Job Description for Health & Wellness Director
Exhibit 75	HPD Anti-Harassment and Discrimination Policy
Exhibit 76	[REDACTED]
Exhibit 77	[REDACTED]

III. RELEVANT POLICIES

We value honesty and integrity⁷

We expect the members of the Haverhill Police Department to have the strength of character, maintain exemplary conduct, and carry out their duties with high moral and ethical standards.

Rule 102 - Unbecoming Conduct⁸

Members of the Police Department shall conduct themselves at all times, both on and off duty, in such a manner as to reflect most favorably on the Department. Unbecoming conduct shall include that which brings the Department into disrepute or reflects discredit upon the individual as a member of the Police Department, or which impairs the operation or efficiency of the Department or the individual. The actions of a police officer that have a reasonable relationship to his/her job performance and/or image and reputation of the police department include, but are not limited to the following:

- a. Criminal conduct, even where the officer has not been convicted of a crime.
- b. Dishonesty in word or deed.
- c. Fighting, arguing or disrespecting any officer or other sworn or civilian member of the police department both on and off duty.
- d. Verbal tantrums while on duty.
- e. Any off-duty misconduct, which directly affects job performance or credibility.
- f. Violations of radio procedure.
- g. Sexual misconduct, particularly while on duty.
- h. Any activity that has a tendency to destroy public respect for municipal employees and confidence in the operation of the police department.
- i. No member shall criticize any other member, except in the line of duty, (constructive criticism - Superior to subordinate). Constructive criticism from superior to subordinate should be conducted in private whenever possible.
- j. No member shall maliciously gossip about any member, any order, policy, procedure, investigation or event that should remain police information, nor shall a member discredit, lower or cause to injure the morale of the personnel of the department or any individual division within the department.

⁷ From: Haverhill Police Department Organizational Values. (Exhibit 70)

⁸ From: Rules and Regulations Manual 26.1.1. (Exhibit 70)

- k. All members shall arrange their personal financial affairs that creditors and collection agents will not have to make use of the office of the Chief of Police for purpose of making collections.
- l. No member will borrow from any other member any money, security, or property, or obtain a guarantee of credit.
- m. No member shall seek the influence or intervention of any person outside the police department for purposes of personal preferment, advantage, transfer, or advancement within the police department.

Rule 103 - Immoral Conduct

Officers shall maintain a level of moral conduct in their personal and business affairs. Officers shall not participate in any incident involving moral turpitude, which impairs their ability to perform as law enforcement officers or causes the Department to be brought into disrepute.

Rule 118 – Insubordination

Members of the Police Department shall promptly obey any lawful orders of a superior officer. This will include orders relayed from a superior officer by any member of the police department. Members shall not commit any other act or omission contrary to good order or discipline....

Rule 126 - Personal Appearance

Members of the Haverhill Police Department, while on duty, shall wear uniforms or other clothing in accordance with the policies and procedures, except when acting under proper and specific orders from a superior officer. Members on duty shall maintain a neat, well-groomed appearance in accordance with the Policies and Procedures. All articles of clothing shall conform to departmental uniform regulations.

Rule 131 - Processing Property and Evidence

Property or evidence, which has been discovered, gathered, or received in connection with departmental responsibilities, will be processed in accordance with established Department procedures. Members of the Police Department shall not convert to their own use, manufacture, conceal, falsify, destroy, remove, tamper with, or withhold any property or evidence in connection with an investigation or other police action, except in accordance with established Department procedure....

Rule 136 – Truthfulness

Upon the order of the Chief of Police, the Chief's designate, or a superior officer, members of the Police Department shall fully and truthfully answer all questions specifically directed and narrowly relating to the performance of official duties or fitness for office which may be asked of them. In cases in which a member of the Police Department is not allowed by provisions of the Policies and Procedures to divulge facts within their knowledge, said member will decline to speak on the subject. A willful omission may be considered an act of untruthfulness.

Rule 143 – Courtesy

Members of the Department shall be courteous to the public. Members shall be tactful in the performance of their duties; shall control their tempers and exercise the utmost patience and discretion; and shall not engage in argumentative discussions, even in the face of extreme provocation. In the performance of their duties, members shall not use coarse, violent, profane, offensive, or insolent language or gestures and shall not express any prejudice concerning race, sex, age, religion, politics, national origin, lifestyle, or similar characteristics.

Rule 148 - Public Statement and Appearance

Members of the Police Department shall not publicly criticize or ridicule the Department, its policies, or other members by speech, writing, or other expression where such speech, writing or other expression is defamatory, obscene, unlawful, undermines the effectiveness of the Department, interferes with the maintenance of discipline, or is made with reckless disregard for truth or falsity. Members of the Police Department shall not address public gatherings, appear on radio or television, prepare any articles for publication, act as correspondents to a newspaper or a periodical, release or divulge investigative information or any matters of the Department while holding themselves out as representing the Department in such matters without approval of the Chief of Police. Members may lecture on police or other related subjects only with prior approval of the Chief of Police.

Rule 160 - Sexual or Racial Harassment

Members and employees shall not engage in any conduct, whether written, verbal or physical, which constitutes either sexual or racial harassment of any other member or employee of the police department.⁹

IV. FINDINGS AND CONCLUSIONS

Having considered all the evidence and drawing the appropriate inferences therefrom, based on a preponderance of the evidence, I make the following findings of fact and conclusions:

⁹ A more detailed definition of harassment is contained in the Department's Anti-Harassment and Discrimination policy. (Exhibit 75)

A. FINDINGS:

1. Robert Pistone, Jr., served as Chief of Police for the City of Haverhill. He was placed on administrative leave on October 9, 2025 (Exhibit 22), following complaints of misconduct reported to Mayor Barrett. (Exhibit 1) He has since resigned from his position and has not participated in this investigation. (Exhibit 2)
2. Stephen Doherty is the Deputy Chief of Police for the City of Haverhill. As Deputy Chief, he reported directly to Chief Pistone. He was placed on administrative leave on October 10, 2025, following complaints of misconduct that Mayor Barrett received. (Exhibits 1 and 39) The Deputy Chief participated in this investigation and was interviewed.
3. Katelyn Tully was one of the seven HPD officers placed on administrative leave following the Gigliotti incident. She died unexpectedly at her home on September 26, 2025. (Exhibit 1) Her funeral occurred on Friday, October 3, 2025. (Exhibit 1)
4. On October 8 and 10, 2025, the Mayor received a variety of complaints from HPD members against Chief Pistone and Deputy Chief Stephen Doherty. (Exhibit 1) Most of these complaints alleged misconduct related to the Gigliotti incident and Ofc. Tully's death. In short, the complainants alleged that the Chief and the Deputy Chief did not do enough to support the arresting officers, including Ofc. Tully. However, some of the complaints, such as the purported use of inappropriate language, were more general and predated the Gigliotti incident. (Exhibits 1 and 68)
5. On or about October 10, 2025, the City of Haverhill retained Discrimination and Harassment Solutions, LLC to determine whether former Chief Pistone and/or Deputy Chief Doherty violated the City's and/or the HPD's policies and procedures. (Exhibits 1, 66, and 68) After some back-and-forth between this investigator and Chief Pistone's attorney, the attorney decided not to appear for an interview. Chief Pistone's decision not to cooperate was made after his resignation from the HPD. (Exhibit 2)

B. CONCLUSIONS:

1. To shield himself from negative blowback, Chief Pistone falsely reported that important decisions regarding the Gigliotti incident were made by Mayor Barrett (and thus beyond his control). He did this on at least three occasions:

- (a) Chief Pistone told many HPD employees that the decision to withhold public comment on the Gigliotti incident was made by the Mayor. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] Deputy Chief Doherty reports that “the captains” asked him and Chief Pistone to issue a statement about the Gigliotti incident, and that Chief Pistone responded by saying that the Mayor, the Mayor’s attorney, and the DA instructed Chief Pistone not to do so.¹² (Interview of S. Doherty) [REDACTED]

However, Mayor Barrett never issued any such order. She avers that “[a]t no time did I instruct Chief Pistone and/or Deputy Chief Doherty *not* [italics in original] to issue a public statement regarding the Gigliotti matter. Instead, I accepted Chief Pistone’s recommendation that the Department and the City should provide very limited statements given that the matter was under investigation.” (Exhibit 66) The Mayor’s account is credible, given that it is uncontroverted by any of the witnesses. In fact, many of the witnesses are satisfied (and in some cases disappointed) that Chief Pistone lied about the Mayor’s “directive.” [REDACTED]

Other witnesses opined that Chief Pistone had a general reputation for untruthfulness. [REDACTED] agreed that the Chief could be untruthful, [REDACTED]: Chief Pistone is "untruthful," and [REDACTED] heard concerns about the Chief's credibility since he left.)

Chief Pistone's attempt to blame the Mayor for his decision to withhold a public statement about the Gigliotti incident violated several Department policies. He violated Rule 102(b), which precludes "dishonesty in word or deed." His activity "has a tendency to destroy public respect for municipal employees [namely, the Mayor's office] and the confidence in the operation of the police department [namely, the Department's reputation for honesty]." See Rule 102(h). He also violated the HPD's Organizational Value for "honesty and integrity" which expressly "expect[s]" all members of the HPD to "carry out their duties with high moral and ethical standards."¹⁴ (Exhibit 70)

- (b) Next, Chief Pistone told [REDACTED] that the Mayor had directed Chief Pistone to reduce the overtime of the seven officers on administrative leave from 8 hours/week to 4 hours/week. [REDACTED] Similarly, [REDACTED] reported that Chief Pistone

Personnel/Confidential

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Deputy Chief Doherty recalls Chief Pistone saying that he got his “pp slapped” for granting the seven officers’ overtime and thus “scaled it back.” (Interview of S. Doherty)

However, Mayor Barrett swore that “[a]t no time did I instruct Chief Pistone and/or Deputy Chief Doherty to reduce the overtime pay (or not permit overtime pay) to the officers involved in the Gigliotti matter. In fact, I was unaware that the overtime payments were reduced and discovered this only after [REDACTED] after Officer Tully’s death, told me. I confronted the Chief, and he indicated that he reduced the payment because the medical examiner determined the Gigliotti death was ruled a homicide.” (Exhibit 66) The Mayor’s account is credible, given that (1) it is uncontroverted by any of the witnesses; and [REDACTED] reported that when they met with the Mayor (before she signed her affidavit), the Mayor provided the same explanation [REDACTED] Further, multiple witnesses agree that Chief Pistone lied about the matter. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] Deputy Chief Doherty believed that the Mayor ordered a reduction in overtime but now knows this is not true. He describes Chief Pistone’s lie as “a betrayal.” (Interview of S. Doherty)

Chief Pistone’s attempt to blame the Mayor for his decision to reduce the overtime for the seven officers violated Rule 102(b), which precludes “dishonesty in word or deed.” His lie “has a tendency to destroy public respect for municipal employees [namely, the Mayor’s office] and the confidence in the operation of the police department [namely, the Department reputation for honesty].” See Rule 102(h). He also violated the HPD’s Organizational Value for “honesty and integrity” which “expect[s]” all members of the HPD to “carry out their duties with high moral and ethical standards.” (Exhibit 70)

(c) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Chief Pistone's attempt to blame the Mayor and the HR Director for [REDACTED] violated Rule 102(b), which precludes "dishonesty in word or deed." His dishonesty "has a tendency to destroy public respect for municipal employees [namely, the Mayor's office and the HR Department] and the confidence in the operation of the police department [namely, the Department reputation for honesty]." See Rule 102(h). He also violated the HPD's Organizational Value of "honesty and integrity" which expressly "expect[s]" all members of the HPD to "carry out their duties with high moral and ethical standards." (Exhibit 70)

2. Deputy Chief Doherty often used derogatory language when speaking about the patrol officers. He complained to [REDACTED] that the police officers were "idiots," and he dismissed their conduct by saying "fuck them." He rhetorically asked [REDACTED] "What are you stupid?" According to [REDACTED], the Deputy Chief's use of such language was "not unusual." [REDACTED] reported that the Deputy Chief would call people in the Department "dumb" and "stupid." [REDACTED] reported that Deputy Chief Doherty referred to groups of officers as "retards." [REDACTED] reported that he has been called a "retard" and "stupid" by the Deputy Chief. [REDACTED]

[REDACTED]

[REDACTED] opined that the Deputy Chief's behavior is "humiliating and degrading" toward officers. [REDACTED]

[REDACTED] has not heard the Deputy Chief use the word "retard," but [REDACTED] agrees that he has used "insulting and derogatory words" to describe the officers. [REDACTED] [REDACTED] has heard the Deputy Chief make "derogatory comments" about the officers.

[REDACTED]

[REDACTED]

[REDACTED]

Deputy Chief Doherty's defenses are not compelling. First, he disputes that his conduct was as shocking as alleged. [REDACTED] [REDACTED] He admits he became "elevated" and could have used "expletives," but denies using the word "retard" or the f-word because he does not "use language like that." (Interview of S. Doherty) This is not credible since the statement is both (1) internally incompatible (i.e., he may have used expletives but does not use the word "retard" or the f-word); and (2) inconsistent with the testimony of many others in the Department. At least four coworkers reported that he used the word "retard" in a belittling manner.¹⁹ [REDACTED]

[REDACTED] This is at most a qualified denial, and not a satisfying response, especially because he goes on to say that he would have remembered using this word (if indeed he had) shortly after reporting that he has limited memory of the event. (Interview of S. Doherty)

Secondly, Deputy Chief Doherty contends that he has "changed over time" when "maybe I was loud." (Interview of S. Doherty) This is not credible. The incident that prompted the Deputy Chief to [REDACTED] Furthermore, none of the witnesses described this self-proclaimed change in character [REDACTED] and some described the Deputy Chief's penchant for foul language in the present tense, even though he is on administrative leave. [REDACTED]

The Deputy Chief's conduct violated the Department's Organizational Value, which provides that the HPD expects all members of the Department to "carry out their duties with high moral and ethical standards." (Exhibit 70) His "verbal tantrums" in the office are "unbecoming." See Rule 102(d). Furthermore, his comments exceed the purview of permissible "constructive criticism" permitted by Rule 102(i). While the record is replete with evidence that Deputy Chief Doherty's inappropriate comments were frequent and intended to humiliate officers, I do not find that his conduct meets the definition of harassment as set forth in Exhibit 75. Although the Deputy Chief's conduct "unreasonably" interfered with employee work performance by "creating an intimidating, hostile, humiliating or offensive work environment," his harassment is not "based on" one of the protected categories listed in the policy (e.g., race, age, religion, disability, or gender identification).

3. Whether Chief Pistone and Deputy Chief Doherty should have done more to support the seven officers involved in the Gigliotti incident reflects on their professional judgment and was not a policy violation per se; accordingly, an assessment of the decisions made in this regard is best reserved for City officials.²² Nevertheless, the evidence shows that across all levels of the HPD, the overwhelming opinion favored public acknowledgment of support for the officers.

Whatever shortcomings are attributable to Chief Pistone (and, to a lesser degree, Deputy Chief Doherty) represent lapses in professional judgment, not policy violations. The Deputy Chief's opinion that the Chief believed he was acting in the best interests of the Department is at least plausible.

4. The evidence is insufficient to substantiate policy violations in the other complaints. They, too, are either questions of professional judgment or beyond the purview of this investigation. [REDACTED]

While multiple witnesses credibly opine that Chief Pistone's punishment in these incidents was excessive and motivated by personal dislike, these allegations are inherently difficult to prove. In each of these incidents, the officer did something wrong (or at least potentially wrong) that warranted at least some corrective action or investigation, and many have already been investigated. Accordingly, while it is certainly possible, and perhaps probable, that Chief Pistone engaged in some form of retaliation against officers who challenged his authority, I cannot make this finding by a preponderance of the evidence.

²² It is beyond the scope of this investigation (and my expertise) to opine whether the conduct and/or inaction of Chief Pistone or the Deputy Chief caused or contributed to the death of Ofc. Tully.

²³ Curiously, Deputy Chief Doherty denies that he thought the matter should be put before a grand jury. In fact, he contends that the HPD should have issued a statement supporting the seven officers and, if the Chief had done so, “it could have helped things.” (Interview of S. Doherty) Although the Deputy Chief’s denial is dubious, there is no evidence that the Deputy Chief was aware that the Chief’s representation that a statement was forbidden by the Mayor was a lie.

²⁴ In a text message to Deputy Chief Doherty on September 2, 2025, Chief Pistone referred to his command staff as “disrespectful fucks for not answering [him]” and for this he would deny them overtime. (Exhibit 55)

[REDACTED]

[REDACTED]

6. Lastly, multiple officers reported that Al Donovan, who sometimes conducted investigations for the HPD, is a friend of Deputy Chief Doherty [REDACTED], and at least one employee expressed concern about his "independence" [REDACTED]. Importantly, no one expressly accused Mr. Donovan of impropriety; however, the City might, going forward, inquire into this relationship with the Department and whether it presents a conflict of interest.

If I can provide you with any additional information, please feel free to contact me.

Very truly yours,

Regina M. Ryan

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