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BRYANT YURIAR and DEREK ERNEST  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11 CHRISTOPHER WILLIAMS,  
12 Plaintiff,  
13 v.

CASE NO. 2:19-cv-5929-ODW-AFM

14 CITY OF LONG BEACH,  
SERGEANT RAY ALEXANDER,  
15 individually and as a peace officer,  
OFFICER DEDIER REYES,  
16 individually and as a peace officer,  
OFFICER BRYANT YURIAR,  
17 individually and as a peace officer,  
SERGEANT DEREK ERNEST,  
18 individually and as a peace officer, and  
DOES 1-10,  
19 Defendants.

**DECLARATION OF  
COMMANDER DARREN LANCE**

Assigned to Hon. Otis D. Wright, II,  
Courtroom "5D"

Trial: 01/11/22

20  
21 **DECLARATION OF COMMANDER DARREN LANCE**

22 I, Commander Darren Lance, declare:

23 1. I am currently employed as a Commander with the City of Long Beach  
24 Police Department and have been a sworn peace officer with the Long Beach Police  
25 Department since 2002. I am currently the Commander over the Internal Affairs  
26 Unit at the City of Long Beach Police Department. Prior to being promoted to  
27 Commander, I was assigned as the Internal Affairs Lieutenant in February 2018,  
28

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1 where I managed the Division and provided training to supervisory staff on both  
2 internal affairs and use of force investigations.

3 2. I make this Declaration in support of Defendants' Response to  
4 Plaintiff's Supplemental Brief in Opposition to Defendants' Motion to Defendants'  
5 Motion in Limine No. 1 and in support of Plaintiff's Motion in Limine No. 5 and  
6 Defendants' Opposition to Plaintiff's Motion for Sanctions Regarding Suppression of  
7 Material Evidence. I have personal knowledge of the facts set forth herein, and if  
8 called upon as a witness to testify thereto, I could competently and truthfully do so.

9 3. On February 22, 2018, an Internal Affairs Administrative Investigation  
10 was opened into an incident involving Defendant Dedier Reyes and another LBPD  
11 officer arising out of an incident dated February 15, 2018, which is unrelated to the  
12 Christopher Williams matter.

13 4. On April 25, 2018, Internal Affairs referred the matter for a criminal  
14 investigation by the Long Beach Police Department, and the criminal investigation  
15 was opened. Accordingly, the Internal Affairs Administrative Investigation was  
16 tolled (suspended) on April 25, 2018, pending the Long Beach Police Department's  
17 criminal investigation into the incident, because a criminal investigation takes  
18 precedence over an Internal Affairs investigation. An internal Administrative  
19 Investigation investigates and makes a preliminary determination of whether Long  
20 Beach Police Department policy was violated, and proposed recommendations for  
21 discipline, if any.

22 5. On December 3, 2021, Officer Reyes was arrested and charged by the  
23 Los Angeles County District Attorneys' Office. The Long Beach Police Department  
24 does not make recommendations to the District Attorneys' Office concerning  
25 whether to prosecute its officers, but turns over its investigative files for the District  
26 Attorney to decide whether to prosecute.

27 6. The stay of the Internal Affairs Administrative Investigation was lifted  
28 after Officer Reyes' arrest and the investigation was no longer being tolled. As of the


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1 date of this declaration, no proposed findings or recommendations have been made  
2 in the Reyes Administrative Investigation arising from the February 15, 2018  
3 incident.

4 7. I am aware that in September 2019, after this lawsuit was filed, Internal  
5 Affairs ran a report for Officer Reyes' Internal Affairs history in connection with  
6 discovery in this lawsuit, which was subsequently produced by the Office of the  
7 City Attorney to the Plaintiff's counsel in this matter on September 26, 2019. As the  
8 Internal Administrative Investigation was tolled at that time, when the report was  
9 run for Officer Reyes' Internal Affairs history, the tolled IA Administrative  
10 Investigation did not appear on Officer Reyes' Internal Affairs History Report,  
11 which was an inadvertent function of the Long Beach Police Department's reporting  
12 program. However, other types of investigations, such as pending Citizen  
13 Complaints or reportable Use of Force incidents do appear on the Internal Affairs  
14 history when a report is run. Accordingly, the Officer's Internal Affairs history  
15 appeared to be complete when such a report is run, but tolled Administrative  
16 Investigations did not appear. Since Internal Affairs learned in December 2021, that  
17 the tolled Administrative Investigation that opened on February 22, 2018 did not  
18 appear on Officer Reyes' Internal Affairs History, we have taken steps to change this  
19 reporting function so that this does not occur again.

20 I declare under penalty of perjury under the laws of the United States of  
21 America that the foregoing is true and correct.

22 Executed on December 15, 2021, at Long Beach, California.

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25   
26 Commander Darren Lance  
27  
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