

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

WOBURN DISTRICT COURT  
DOCKET NO. 2018 INQ 001

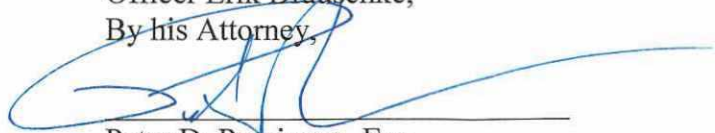
IN RE: INQUEST INTO THE DEATH OF ALAN GREENOUGH  
IN READING, MA, ON FEBRUARY 3, 2018

**PROPOSED TESTIMONY OF CHARLES M. DICHIARA**

Now comes Officer Erik Drauschke, an involved party in the above-captioned matter, and hereby requests that this Court allow him to present the testimony of Charles M. DiChiara. Mr. DiChiara is a police officer in the City of Waltham and was not involved in the incident as issue. However, Mr. DiChiara is a certified "Master Instructor" in Use of Force and Defensive Tactics and has been qualified as an expert witness in those areas in both state and federal courts. He is expected to testify about how Massachusetts police officers are trained to approach and react to use of force situations, the use of force model and "totality triangle", the *Graham v. Connor* objective reasonableness standard as well as the "suicide by cop" phenomenon. He is also expected to be posed hypothetical scenario(s) by counsel and asked to offer his opinion. Mr. DiChiara's curriculum vitae is attached hereto.

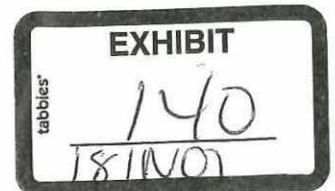
Respectfully submitted,

Officer Erik Drauschke,  
By his Attorney,



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Dorchester, MA 02122  
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DATED: March 25, 2019



**Charles Michael DiChiara**

183 Robbins Street

Waltham, MA 02453

339-222-8305

**PROFESSIONAL EXPERIENCE**

**2015-Present**

**Training Officer**

**City of Waltham, MA Police Department**

1997 – Present

**PATROLMAN**

City of Waltham, MA Police Department

1994- 1997

**DETECTIVE**

North Andover, MA Police Department

1990- 1994

**PATROLMAN**

North Andover, MA Police Department

1988- 1990

**RESERVE POLICE OFFICER**

North Andover, MA Police Department

**EDUCATION**

1990- Present

**SPECIALIZED TRAINING**

2000 hours of advanced training

1999

**SPRINGFIELD COLLEGE**

Bachelor of Science Degree in Criminal Justice

1990

**TOPSFIELD REGIONAL POLICE ACADEMY**

37<sup>th</sup> Municipal Police Officer Class

1988

**NORTHEAST REGIONAL POLICE INSTITUTE**

1986- 1988

**SALEM STATE COLLEGE**

1975- 1986

**NORTH ANDOVER PUBLIC SCHOOLS**



### *Instructor Biography*

Officer Charles M. DiChiara has been a Police Officer for the past 30 years. He currently works for the City of Waltham Police Department and is the Training Officer/Coordinator for the Police Department, after spending 26 years working nights in the Patrol Division.

For the past 27 years, Off. DiChiara has also been assigned to the NEMLEC SWAT Team, a multi-jurisdictional tactical team that is responsible for responding to critical incidents within the 61 cities and towns in the Greater Boston and Northeast region of Massachusetts. He has been involved in over 600 SWAT missions and is currently a member of the Alpha/Primary Entry Team, as well as the Training Cadre. Off. DiChiara received the George L. Hanna Award for Bravery from the State of Massachusetts in 2006 for his role in a hostage crisis in which multiple shots were fired. He also received a city citation for his role in apprehending a suicidal male armed with a shotgun. He recently received a Resolution from the City of Waltham for his role in the Boston Marathon incident, as well as his role in the apprehension of both terror suspects during the Watertown event in 2013.

Off. DiChiara is a state and nationally certified Instructor-Trainer in the areas of Firearms, Defensive Tactics, Use of Force, Physical Fitness, Active Shooter Resolution and Verbal Defense and Influence. He holds the ranking of Master Instructor in the commonwealth, as well as being a Master Instructor for both Taser International and the Monadnock-Safariland Training Group.

In 2011, Off. DiChiara received the distinction of being nominated for Master/International Instructor by the Monadnock-Safariland Training Group. After training with officers from Switzerland and the U.K., he became the 113<sup>th</sup> Master Instructor, out of the 52,000 instructors worldwide and the 3500 Advanced Instructors. In 2018 Off. DiChiara was promoted to the Advisory Board for the Safariland Training Group.

He has been training police officers since 1999 and has trained in excess of 10,000 police officers as well as 1000 law enforcement instructors across the country. He has trained the Columbian National Police, as well as officers from Canada, Switzerland and England.

Off. DiChiara is a member of the Defensive Tactics Executive Board for the state and is a court qualified expert witness in Defensive Tactics, Police Use of Force, and police standards and practices. He has been qualified as an expert in District and State Superior Court, as well as Federally in United States District Court. In 2015 Off. DiChiara was identified as one of four SME's (Subject Matter Experts) in police use of force for the Commonwealth of Massachusetts. In 2014 he assisted with the update and rewrite of the Defensive Tactics Manual for the state, and in 2018 he assisted with revamping the MPTC's Basic Recruit Academy Training Program, in the areas of Use of Force and Arrest and Control. He is currently the Lead Defensive Tactics and a Firearms Instructor at Lowell, Boylston, Randolph and Methuen Police Academies. He has been the guest speaker at numerous police academy graduations.

## **Expert Opinion of Charles M. DiChiara**

### **I. Qualifications**

*I am currently the Training Officer/Coordinator for the City of Waltham Police Department, as well as an Instructor-Trainer for the Municipal Police Training Committee. I have been a police officer for over 30 years and I am currently the Lead Defensive Tactics Instructor and Use of Force Instructor, as well as a Firearms Instructor at the Lowell, Randolph, Boylston and Haverhill-Methuen Police Academies. I have trained thousands of police officers, including MA Police Chiefs, and Supervisors in the areas pertaining to Police Use of Force, Deadly Force, Patrol Procedures, Officer Survival, Electronic Weapons, Less Lethal Force and Verbal Defense and Influence. I have been identified as a Subject Matter Expert within the Commonwealth of Massachusetts and currently sit on the Executive Board for the Defensive Tactics Committee. During the past 20 years I have acted as a Field Training Officer for the department, training new officers, as well as being in charge of in-service training for veteran police officers. I am currently employed as an independent consultant and expert witness in police use of force and have reviewed numerous cases involving police use of force, and deadly force. I have also reviewed cases involving police misconduct, for both Plaintiffs and Defense, and reviewed cases involving police tactics to determine if they were consistent with law, department policies and police training. Within the Commonwealth of Massachusetts I am currently a court qualified expert witness in District, Superior and United States District Court. Within the past four years, I have testified in the following cases: United States of America vs Shawn Coughlin (docket #12-CR-10328-NMG) and Andrew Bochart vs City of Lowell, United States District Court of Massachusetts Civil Action 13-CV-11753-FDS. Also within the past four years, I have written expert opinions in the following cases: 1) Commonwealth vs Joseph O'Brien, Taunton District Court (docket #14-TA-01384) 2) Joseph Belcufine vs Shrewsbury Officers Ryan Chartrand and Christopher Boudreau (civil action docket #U.S.D.C. C.A.4:14-CV-40032 TSH) 3) John Humphrey vs Town of Spencer Officer Todd Laporte (civil action docket #U.S.D.C. C.A. 4:14-CV-41027 TSH) 4) Christina Gracia individually, as a Personal Representative of the Estate of Malcolm Gracia vs City of New Bedford Police Department (civil action docket #1573-CV-00467) 5) Dana Berger vs Webster Police Officer Patrick Perry and Town of Webster, MA (civil action United States District Court #4:15-CV-40087) 6) Marianne Diaz vs City of Worcester, MA Police Department SWAT Team (civil action United States District Court #16-CV-40039-TSH and 7) Cambridge Police Department incident #18002308 (Selorm Ohene incident) for review by Cambridge Police Department Division of Professional Standards and police review board. I most recently have written an expert opinion then testified at deposition and trial in United States District Court in the case Carla Sheffield (Personal Representative of the Estate of Burrell Ramsey-White) vs Boston Police Officers Mathew Pieroway and Joel Resil, United States District Court No 15-cv-14747-NMG.*