

EXHIBIT

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**UNITED STATES OF AMERICA
IN THE DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ERNEST FLAGG, as Next Friend of
JONATHAN BOND, a minor,

Case No.: 05-CV-74253
Hon. Gerald Rosen

Plaintiff,

-vs-

**AFFIDAVIT OF LT.
ALVIN BOWMAN**

CITY OF DETROIT, a municipal corporation;
DETROIT POLICE CHIEF ELLA BULLY-
CUMMINGS; DEPUTY DETROIT POLICE
CHIEF CARA BEST; JOHN DOE POLICE
OFFICERS 1 - 20; ASST. DEPUTY POLICE
CHIEF HAROLD CURETON; COMMANDER
CRAIG SCHWARTZ; POLICE LT. BILLY
JACKSON; MAYOR KWAME M. KILPATRICK,
CHRISTINE BEATTY, jointly and severally

Defendants.

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AFFIDAVIT OF ALVIN BOWMAN

THE UNDERSIGNED AFFIANT, HAVING BEEN FIRST DULY SWORN, HEREBY DEPOSES AND STATES THE FOLLOWING:

1. My name is Alvin Donald Bowman.
2. I am a former lieutenant with the Detroit Police Department and served with the Detroit Police Department for over thirty-one years.
3. In November of 2003, I was assigned to the homicide division of the Detroit Police Department, and in particular to Squad 8 and was in charge of the entire Squad.
4. Squad 8 was assigned the Tamara Greene homicide file. Sgt. Marion Stevenson was the lead investigator on that file up to the time it was transferred to the Cold Case Squad less than one year later.
5. I read the reports contained within the case file. I read the witness statements, the preliminary information from the on-scene investigation, and the various preliminary complaint reports. I looked at the morgue photographs and the morgue report. I found that Ms. Greene had been shot approximately 18 times with a .40 caliber weapon, the kind of weapon that is issued to members of the Detroit Police Department and it appeared to me that it was an overkill of this woman.
6. I was also aware that despite the number of shots that were fired into Ms. Greene's vehicle, her passenger was able to get out of the vehicle and, though shot, was not killed.
7. Based on my investigation of the case and knowledge of the file, the shooter was the passenger in a white Trailblazer. After killing Ms. Greene, the vehicle circled back around and had an opportunity to shoot the passenger, who by then had exited the

- vehicle. Despite having a clear shot at the passenger the shooter did not fire any further shots at the passenger.
8. Based on my investigation of the case and knowledge of the file, my training and my years of experience, and the fact that the shooter chose not to kill the passenger after having a clear opportunity to do so, I believe that Ms. Greene was the target of a contract killing.
 9. Based on the number of shots that struck Ms. Greene, it appeared to me that the shooter had training consistent with the training received by law enforcement officers.
 10. Based on my investigation of the case and knowledge of the file, my training and my years of experience, I suspected that the shooter was a law enforcement officer, and more specifically, a Detroit Police Department officer.
 11. I was aware at the time that Ms. Greene was a licensed exotic dancer who went by the stage name of "Strawberry."
 12. Throughout the course of the investigation, I was aware of the rumors that Ms. Greene was one of the strippers alleged to have performed at a wild party widely suspected to have occurred at the Manoogian Mansion approximately six months before her death.
 13. The focus of our investigation was to solve Ms. Greene's murder not to investigate the Manoogian Mansion party. However, because of the persistent and pervasive rumors concerning her appearance at that party and rumored assault by the Mayor's wife, Carlita Kilpatrick, my investigation required my Squad to follow up and investigate those rumors.

14. In the course of our investigation, I learned from the Michigan State Police that they possessed a telephone record linking Ms. Greene to high-ranking City employees not long before her murder.
15. I also learned that Tamara Greene danced for and was employed by an associate of Mayor Kilpatrick.
16. As we proceeded in this investigation, every witness that I encountered regarding this case, and every witness that members of my Squad contacted on this case felt threatened and intimidated against coming forward on this case and testifying. Specifically, they feared retaliation by those close to the Mayor, individuals such as the Mayor's Executive Protection Unit Police Officers Lorenzo Jones and Mike Martin.
17. On information and belief, Jones was a high school football buddy of Mayor Kilpatrick.
18. On information and belief, Officer Martin was a close friend of Jones. Both EPU Officers came out of the 2nd Precinct, which was widely viewed by those in the Detroit Police Department as the "Wild Wild West."
19. It was widely believed by those in the Detroit Police Department that both Jones and Martin had great influence with Mayor Kilpatrick, that they essentially had authority to do virtually anything they chose without fear of repercussions, and that where they were concerned, there was no chain of command. For example, even though he never exceeded the rank of Police Officer, Officer Jones had *de facto* control over the Executive Protection Unit, despite the fact that at all relevant times, lieutenants and sergeants have also been assigned to the Executive Protection Unit.

20. From the start, this homicide investigation was treated differently than any other homicide investigated by the department.
21. First of all, the file commanded an unexplainable amount of attention from then Chief of Police Jerry Oliver, and later from his successor, Chief Ella Bully-Cummings. Both of these individuals answered to the Mayor and his Chief of Staff Christine Beatty.
22. Regarding Chief Oliver, on numerous occasions, he requested the file be sent to his office for his review.
23. On each occasion, the file was returned to Squad 8 with reports missing from the file.
24. After she replaced Chief Oliver, Chief Ella Bully-Cummings called me into her office, along with Executive Deputy Chief Harold Cureton, Cmdr. Craig Schwartz, and Lt. Billy Jackson.
25. At this meeting, she indicated that she was aware of the connection between the Tamara Greene investigation and the Mayor. She also stated due to the nature and sensitivity of this case, that this case was not to be discussed outside of her office. In fact, she required the file to be placed away in safekeeping and not to be discussed openly with anybody.
26. At that point Harold Cureton, who held the number two position in the Detroit Police Department at the time, asked "Why can't this shit just go away?"
27. I explained to them that while we were not there to investigate any rumors of a wild party involving the Mayor; that we had a duty, a responsibility and an obligation to bring closure to this female's death and to investigate it properly and thoroughly, even

if that meant chasing rumors to the Manoogian Mansion, Mayor Kilpatrick and those close to him.

28. Nonetheless, Lt. Billy Jackson took the file and put it in a combination locked safe. I did not have the combination to that safe.
29. One of my Squad members, Sgt. Marion Stevenson told me that her case notes on the Tamara Greene murder investigation were erased from her computer hard drive. Further, she stated that her zip storage files disappeared from a locked cabinet inside the police department. She further informed me that she learned this was the work of City IT personnel. I also learned that they seized my computer after my transfer.
30. All of my Squad members feared that they may lose their jobs and even feared for their physical safety if they continued to investigate the case. One example of intimidation came during my lawsuit against the Mayor, Chief Bully-Cummings, Christine Beatty and the City of Detroit in the Wayne County Circuit Court in a case captioned ALVIN D. BOWMAN -v- ELLA BULLY-CUMMINGS, Chief of Police, CHRISTINE BEATTY, Chief of Staff, KWAME KILPATRICK, Mayor, City of Detroit and The CITY OF DETROIT, and assigned case number 04-411909-NZ. I gave a deposition on May 19, 2005. My home was broken into precisely during the time that I was attending my deposition. The circumstances and timing of the home invasion lead me to suspect that the invader knew when I would be gone and when I would return.
31. Another example of intimidation was reported to me by Sgt. Stevenson. According to Ms. Stevenson, since this civil action brought by the family of Tamara Greene began

- getting press attention approximately two months ago, she has received several unexplained police responses to her home.
32. My meeting with Chief Bully-Cummings occurred on a Wednesday during my vacation, so when I left Chief Bully-Cummings' office, I did not return until the following Monday.
33. When I returned, Lt. Billy Jackson told me that the Tamara Greene investigation had been transferred to Cold Case. When I asked him why, he told me that I had been asking too many questions about the Strawberry case.
34. At the time, the Tamara Greene investigation did not meet the criteria for transfer to the Cold Case Squad because it was less than a year old and was being actively investigated. To be a "cold case" the investigation must be at least two years old under the policies and practices that were in place at the Detroit Police Department at that time.
35. I believe that Chief Ella Bully-Cummings, Executive Deputy Chief Harold Cureton and Cmdr. Craig Schwartz ordered that the file be transferred to Cold Case in order to prevent my Squad and me from investigating anything that may call for or otherwise relate to anything having to do with the Manoogian Mansion party.
36. I then discussed the Tamara Greene Case with Sgt. Odell Godbold, head of the Cold Case Squad and asked him if he knew he had the murder case. He responded that that case is a "hot potato" and that "we're not going to investigate this case." He then explained that he feared retribution because of Ms. Greene's connection with the Manoogian Mansion. He also told me his nephew had a sexual relationship with Tamara Greene.

37. Shortly thereafter, I was transferred out of homicide to the 2nd Precinct, working the desk midnights in a uniform. Again I asked Lt. Billy Jackson why, and again he told me it was because I asked too many questions about the Tamara Greene Case.
38. I tried to get an explanation for my transfer. Eventually, Deputy Chief Cara Best told me that I was being transferred because in a report, I allegedly misspelled the word "homicide."
39. The officers on my Squad would have vigorously investigated the case if it had no ties or connections or rumors or allegations of a nexus to the party, to the Mayor, or his acquaintances. My Squad would have solved Ms. Greene's murder but for the interference by Mayor Kilpatrick, Christine Beatty, Chief Ella Bully-Cummings, Former Chief Jerry Oliver, Cara Best, Commander Schwartz and Harold Cureton.
40. The members of my Squad and I were aware or otherwise believed that Gary Brown was fired because Mayor Kilpatrick and his Chief of Staff Christine Beatty did not want there to be an investigation of the Manoogian Mansion party.
41. The members of my Squad and I were aware or otherwise believed that the file was given to Cold Case and that I was transferred because neither Mayor Kilpatrick nor his Chief of Staff Christine Beatty wanted there to be an investigation of the Manoogian Mansion party. My Squad and I were also of the opinion that Chief Ella Bully-Cummings, and Harold Cureton reported directly to Mayor Kilpatrick and/or his Chief of Staff Christine Beatty about the Greene homicide investigation and that they believed that the Tamara Greene homicide investigation would have overlapped with an investigation of the Manoogian Mansion party.

42. I filed suit for retaliation against the Mayor, Chief Bully-Cummings, Christine Beatty and the City of Detroit in the Wayne County Circuit Court in a case captioned ALVIN D. BOWMAN -v- ELLA BULLY-CUMMINGS, Chief of Police, CHRISTINE BEATTY, Chief of Staff, KWAME KILPATRICK, Mayor, City of Detroit and The CITY OF DETROIT, and assigned case number 04-411909-NZ. Ultimately, the case went to jury trial and the jury returned a verdict in my favor, ruling that I was retaliated against by the City in connection with my investigation of the murder of Tamara Greene.
43. As of the date of my deposition in that case, which occurred on May 19, 2005, I believe that the Mayor, Chief Bully-Cummings, Christine Beatty, and Jerry Oliver made it impossible to investigate, let alone solve the murder of Tamara Greene; they disposed of reports that were contained in the homicide file, and retaliated against anyone that dared investigate anything having to do with the Manoogian Mansion party, even if it involved the death of this young girl, Tamara Greene.
44. The Mayor, Chief Bully-Cummings, Christine Beatty, and Jerry Oliver created a culture of fear and intimidation that not only scared off investigators and made them fear for the jobs and safety, but also scared off witnesses; witnesses who heard the rumors of Ms. Greene dancing at the party, saw what happened to Ms. Greene, learned of the retaliation against police officers who tried to investigate, and believed that if the good cops couldn't protect themselves, that they certainly could not protect the witnesses.
45. I am a mentally competent legal adult and can testify to these facts if called upon to do so.

FURTHER, THE AFFIANT SAYETH NOT.

Alvin Bowman
ALVIN DONALD BOWMAN

Subscribed and sworn to before me
this 29 day of February, 2008.

Lee Ann Rutila
Notary public LEE ANN RUTILA
Notary public, State of Michigan, County of OAKLAND.
My commission expires: 10/18/2014
Acting in the County of Wayne

