

Court Security Issues 2010

Jennifer Scott

Abstract

Since the 9/11 attack on our soil, protecting our nation's courts, from the Federal level to the local courts, has been an on-going exercise in patience and persistence. While all would agree that protection of our basic civil liberties should be done with an open pocketbook; court security is one of the first things to be cut when budgets are reduced. Information concerning the current state of protection available to our local courts, and the changes that have occurred to the unit since 9/11, as well as in response to the recent recession, was compiled through anonymous surveys from sheriff's offices from 47 of the 66 counties in the State of Florida. The results of this survey provides a snapshot in time of the current state of our courts security and importantly, an idea of the ground that will need to be crossed in order to protect the judicial system in an effective manner.

Literature Review

In addition to the increase in awareness of our security issues since 9/11, security of our nation's courts and the judges within them has resulted in new security measures being taken, and modifications of existing laws. An example of this was recently discussed in an article titled, "Threats to federal judges and prosecutors have more than doubled in the past six years" (Associated Press, 2010). In this article, it discusses a report issued by the Justice Department that discovered that "Between 2003 and 2008, the number of threats and inappropriate communications jumped from 592 to 1,278. The government defines "inappropriate communications" as messages that aren't explicitly threatening but worrisome enough to require further investigation" (Associated Press, 2010). An example of a modification to an existing law, such as H.R. 1130: Judicial Disclosure Responsibility Act, restricts disclosure of personal information about family members of judges whose revelation might endanger them, and extends through 2009 the authority of the Judicial Conference to redact certain personal information of judges from financial disclosure reports (110th Congress: Judicial Disclosure Responsibility Act, 2007).

In Maine, budget cuts have reduced the level of court security to the point that the metal detectors are not turned on, simply because the court officials cannot afford to staff an officer to run them. (Lavoie, 2010) This type of behavior as a response to budget shortfalls is not only found in Maine; in Massachusetts, "vacant court officer jobs haven't been filled in the last 15 months, and the courts stopped using about 30 temporary workers who filled in for officers out sick or on vacation. The reductions have delayed hearings because officers are shuffled around to different courtrooms." (Lavoie, 2010)

Another example of a disturbing response to a lack of funding was found in a larger court, as urban areas are more likely to be effected by budget shortcomings.

“In Birmingham, Alabama, Judge Suzanne Childers keeps a silver .38 caliber Smith & Wesson under her bench after county officials let her two courtroom deputies go because of a budget shortfall.” “I feel like I need some kind of protection, both for me, my staff and the general public,” said Childers, who often has angry people battling over divorce or child custody issues in her courtroom. “I don’t want to be in a situation where I’m on the bench and I’m a sitting duck.” (Lavoie, 2010)

Other examples described in the article include a situation that recently occurred, in Las Vegas, where, “A man who lost a lawsuit over his Social Security benefits opened fire in a federal courthouse; killing a security guard and wounding a U.S. Marshal. After the shooting, authorities announced a nationwide review of federal courthouse security.” (Lavoie, 2010)

In 2005, an inmate being escorted to his rape trial in Atlanta stole a deputy’s gun, shot and killed a judge, sheriff’s deputy and court stenographer, and later, an off-duty federal agent. That shooting led some courts to add security cameras, install panic buttons for judges, clerks and security officers, and increase training. (Lavoie, 2010)

In an article written by Kari Hailey, called “Guns, Courts, and Civil Liberties; the author describes how her father, a district court judge for the Northeast Central Judicial District of North Dakota, was shot in his courtroom in May, 1992. According to the daughter, as her father presided over a child support hearing, the respondent became enraged, pulled out a .357 magnum pistol, and aimed at her father’s head at point-blank range. Fortunately, her father stood quickly and the bullet entered his abdomen, resulting in extensive damage, shredding his digestive track and nicking his spinal column. Her father survived the attack, however continues to experience serious physical consequences from the shooting. (Hailey, 2003)

Smaller jurisdictions have serious issues with court security as well. “A former prison nurse helped her husband escape Tuesday by fatally shooting a correctional officer who was escorting him outside a county courthouse.” (Associated Press, 2005) Jennifer Hyatte had been fired from her job at a prison in Tiptonville because of her relationship with George Hyatte, a state official told The Knoxville News Sentinel. She worked for a state contractor, Correctional Medical Services. The pair had met and married while George Hyatte, 37, was behind bars for armed robbery and other charges. The career criminal later would plead guilty to first-degree murder in the 2005 fatal shooting of guard Wayne “Cotton” Morgan, 56; attempted first-degree murder in the wounding of guard Larry “Porky” Harris, and felony escape. In a deal with prosecutors, he agreed to be incarcerated for the rest of his life. His wife, Jennifer Hyatte, a former prison nurse who met and married Hyatte behind bars, received the same sentence after pleading guilty to similar charges in 2007. (Mansfield, 2009) As a result of this, “Roane County Courthouse Shooting Spurs Sally Port Construction”. According to Roane County Sheriff Jack Stockton, the August 2005 murder of Corrections Officer Wayne “Cotton” Morgan was “an awakening for all law enforcement locally.” A new sally port has been built at the Roane County courthouse, and transporting prisoners has become safer for law enforcement officers. Officer can now pull into the secured garage, lower the metal doors and escort the

prisoner to the courtroom. The new security measure limits face-to-face contact between prisoners and the public. Officer Morgan's son said his family is grateful the sally port was built and hopes it saves lives. However, they are saddened it took a tragedy to bring attention to the need. (Sharp, 2009) Interview is located here: <http://www.wbir.com/video/default.aspx?bctid=38546548001>

Federal courthouses are included in the discussion; "A man who walked into the federal courthouse in downtown Seattle today carrying a hand grenade was shot and killed, police said." Police said he walked into the building shortly before noon. The man, dressed in camouflage gear, also wore a backpack attached to his chest, but the chief said it did not appear the backpack held any explosives. The man did not go through any security checkpoint and was just inside the building lobby. He was shot by Seattle police. (Green, 2005)

"Even courthouse designed for safety can be compromised" Monday mornings' courthouse shooting served as a reminder of just how elusive a goal it can be to design a perfectly secure building. The George Federal Building in downtown Las Vegas was the first such facility in the nation be designed to standards to withstand the kind of lethal blast that buckled the Alfred P. Murrah Federal Building in Oklahoma City in 1995. But little can be done; it seems, to stop a lone gunman from entering a lobby and, before reaching the security measures, opening fire. That's what happened Monday when a gunman, apparently angry over Social Security benefits, fired his gun just inside the courthouse lobby, killing a security officer and wounding a marshal before fleeing and being shot dead across the street. (Kanigher, 2010)

"Nevada to study courthouse safety in wake of shooting", Nevada Supreme Court Justice Ron Parraguirre said today that the state judiciary will examine courthouse security throughout the state in response to Monday's deadly shooting at the Lloyd SD. George Federal Courthouse in downtown Las Vegas. "We have seen what can occur and we need to be sure we can protect our judges, court staff and citizens," he said. "A Court Security Task Force was created several years ago to address the issue and we have made significant strides despite our fiscal limitations." (Kanigher S. , 2010) The shooting prompted by a gunman just inside the entrance to the courthouse cost the life of court security officer Stan Cooper and wounded Deputy U.S. Marshal Richard J. Gardner. The gunman, Johnny Lee Wicks, also was killed. Parraguirre said security is of particular concern in rural areas that have aging courthouses. "Even in the states' most populous counties, the courts struggle every day to provide adequate protections for those who work in and visit the facilities," he said. (Kanigher S. , 2010)

"Federal authorities will conduct a nationwide review of courthouse security after a gunman killed a courthouse officer and wounded a deputy marshal in Las Vegas, a senior official said Wednesday." (Press, 2010) "Michael Prout, a security official with the U.S. Marshals Service, told the Associated Press his agency will scrutinize safety measures at more than 400 federal facilities around the country. Prout said many federal courthouses and other buildings do not have the kind of modern security checkpoints in place at the Las Vegas Building. Authorities say Johnny Lee Wicks, who was angry over losing a lawsuit protesting a cut to his Social

Security benefits, opened fire with a shotgun Monday after walking up to the security checkpoint at the courthouse entrance.” (Press, 2010)

Even in 1997, Court Security and the Transportation of Prisoners, was a topic of a research study by the National Sheriff’s Association. (Jeremy Travis, Director, 1997). Information was gathered from interviews and questionnaires administered to court security, probation, parole, and sheriff’s personnel nationwide; a review of existing research literature and reports of some of the violent incidents that occurred in courts over the past two decades; and input from the Project Advisory Board, Staff Review Committee, practitioners, experts in the field, and other criminal justice organizations. (Jeremy Travis, Director, 1997)

Method

It is my intention to conduct a survey of the 66 sheriff’s offices in the State of Florida, using an internet survey method; in an attempt to determine if the status of the court security division in these sheriff’s offices has changed since 9/11, as well as any change due to the current recession and budget constraints. The results that I wish to find include: the ratio of court security officer to judge, depending on the type of court case, if the officers are armed, and with what, and if they rely on unpaid volunteers. I am also asking if the court security officers need to conduct the transportation for the court proceedings, and if the judges are armed in the courtroom. I will conduct the survey by sending an email notification and request to the various sheriffs’ offices and will ask for participation in the survey. I have also included the fact that the responses are confidential, and I am not asking for any identification of the agency that is providing the answers. In addition, I will analyze all of the responses, and remove any mention of individual agencies. Even with these factors in place, I am not confident that all the answers will be provided, due to confidentiality and security reasons, but I feel that many of the agencies will participate. The date the surveys will become available will be March, 2010, and I will stop collecting responses in May, 2010.

Results

The results of my findings indicate that Court Security has been affected by 9/11; that effort has been made to strengthen and improve on resources available to protect the courthouses, however, due to budget restrictions, positions that have become vacant are not always being filled, and the courts are having to make due with limited resources and staffing or have had to make changes in staffing; such as replacing a full-time officer with a part-time officer, or relying on volunteers and civilians to fill in deficits.

In Question #2, “Are your Court Services Officers armed in the courtroom? If no, explain why” This questions elicited the highest yes response, with 95.7%, or 45 out of 47, stating that they did have the Court Services Officers armed in the courtroom. In relation to this, Question #3, “Do you have non-certified personnel (paid or unpaid) providing security in a courtroom?” had a response of 26.1% stating yes, and 73.9% responding no, with some additional clarifications to the responses. Examples of the clarifications include: “They are not certified LEO’s. The civilian

position of Court Support Officer (CSO) was created to save money (lower salary/benefits) achieved by pairing a CSO with an armed deputy. If we were going to train and arm them, we would use deputies.” “Officers assigned to the Judge are but officers working inmates are not” and “We have civilian bailiffs assigned to the courtrooms. Armed deputies patrol the judicial complex, and are available for calls.”

Discussion:

In this survey, I found that agencies on average, dedicated a large portion of staff to court security, with 17.9% of those surveyed having over 31 members assigned to the unit. Surprisingly, 33.3% of those surveyed had five or fewer members. The explanations of why the numbers were of no set pattern as to staffing ratios, based on additional information offered was in conjunction with the number of courts, judges, and the affordability of having additional staff.

Question #4, “Are law enforcement officers that are appearing in court for work-related obligations allowed to remain armed in the courthouse? If no, explain why” also garner a large amount of response, as well as a large amount of additional information in the responses. In the responses, 84.8%, or 39 agencies, responded “yes”, and 15.2%, or 7 agencies, replied “no”, with one agency skipping the question. In this case, to explain the question, when an officer is appearing in court, while on-duty, and appearing for a work-related, non-personal court obligation, 39 of the agencies who participated in the survey allow the wearing of duty weapons. Seven of the agencies are not allowed, resulting in unarmed officers in the courthouse. In an active shooter situation, you would like to see more officers on scene, armed. In this case, if you are not a bailiff, you would have to go and retrieve your firearms from a lock box, delaying the possible response to an event. I found this interesting, as officers are allowed to carry their firearms anywhere else while on duty, and in many cases, are expected to carry their weapon while off-duty. The reason for the disparity include being limited by judicial order, that in a few circuits, the Chief Judge of the Circuit has deemed that the only officers wearing firearms in court shall be those assigned to him. While there have been a few cases where the individual order have been changed or overturned, in all cases, the wearing of firearms while in court on personal obligations is forbidden, as well as the wearing of firearms while in plain clothes.

In an interesting parallel, Question #7, “Are you aware of any of the judges arming themselves?”, 71.7%, or 33 of the agencies responding, indicated that they were aware of judges arming themselves, with 28.3% or 13 agencies, responding no. One agency skipped the question.

Question #8, “Since 09-11, have you implemented any increases in security to the courthouse, such as adding additional personnel or changing any aspect of the courthouse?” 78.7%, or 37 agencies, replied, yes, with 21.3% or 10 agencies replying “no”. Additional answers to this question held to the same general responses stating the increased use of scanners, both hand-held and booth, metal detectors, X-Ray machines, cameras, and upgrades or review of procedures. In addition, this is where volunteers are used as a supplement to staff as an observer.

Also, there appears to be some issue in one county, where the Clerk of Court has not provided any security on their own.

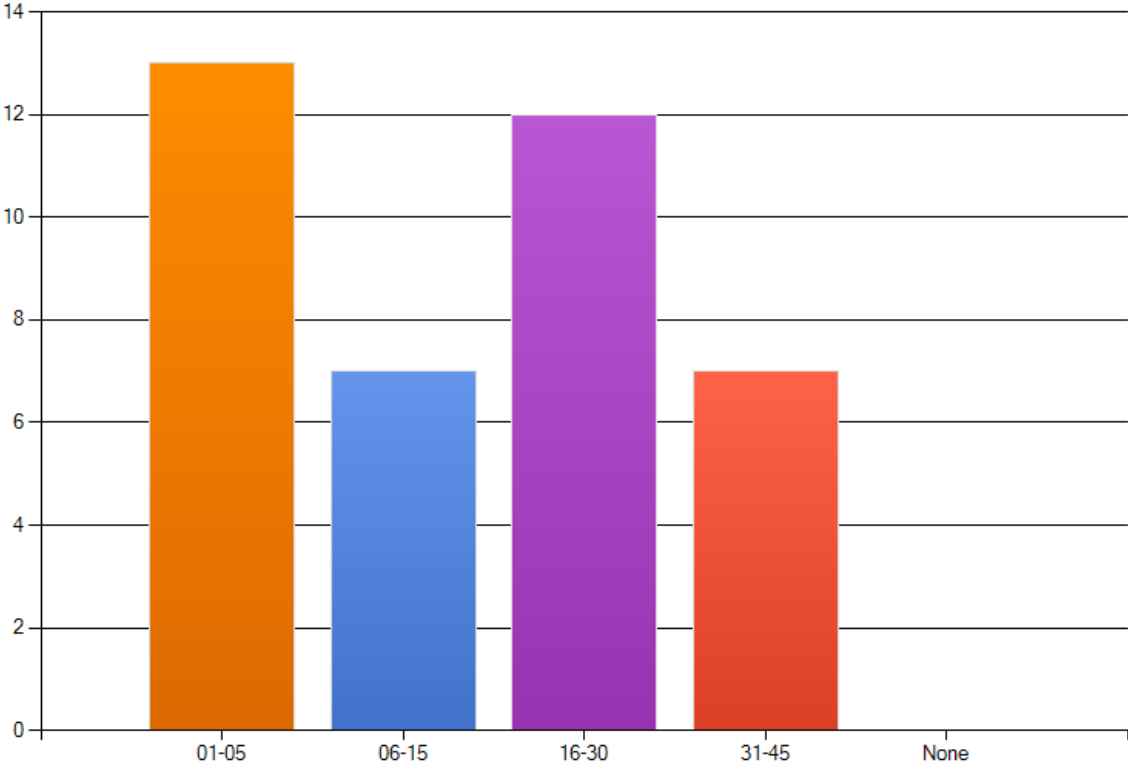
While changes have been made, or at least an increase in awareness of security needs since 9/11, the budget and its new restrictions have had some effect on court security. In Question #9, "Have you lost any positions due to budget restrictions? How many?" 69.6% indicated no, or 32 agencies, while 30.4% or 14 agencies indicated yes, with one agency skipping the question. It is ironic that while we are experiencing a heightened awareness of what can go wrong and the inherent risks of protecting our court system, that the limitations of the budget do not allow our agencies to keep the staffing levels that they have achieved, and have reduced or eliminated some positions.

Recommendations:

Based on the results of the survey, it is my recommendation that Court Security remain a priority, and that efforts be made to reduce the negative effects of budget cuts to the unit. It is important to not lose any ground that we have earned, by giving up security, training, and experience in order to cut the budget.

Question #1

How many certified law enforcement officers do you currently have assigned to the Courts?



Information	Response percent	Response count
01 to 05	33.30%	13
06 to 15	17.90%	7
13 to 30	30.80%	12
31 to 45	17.90%	7
None	0.00%	0

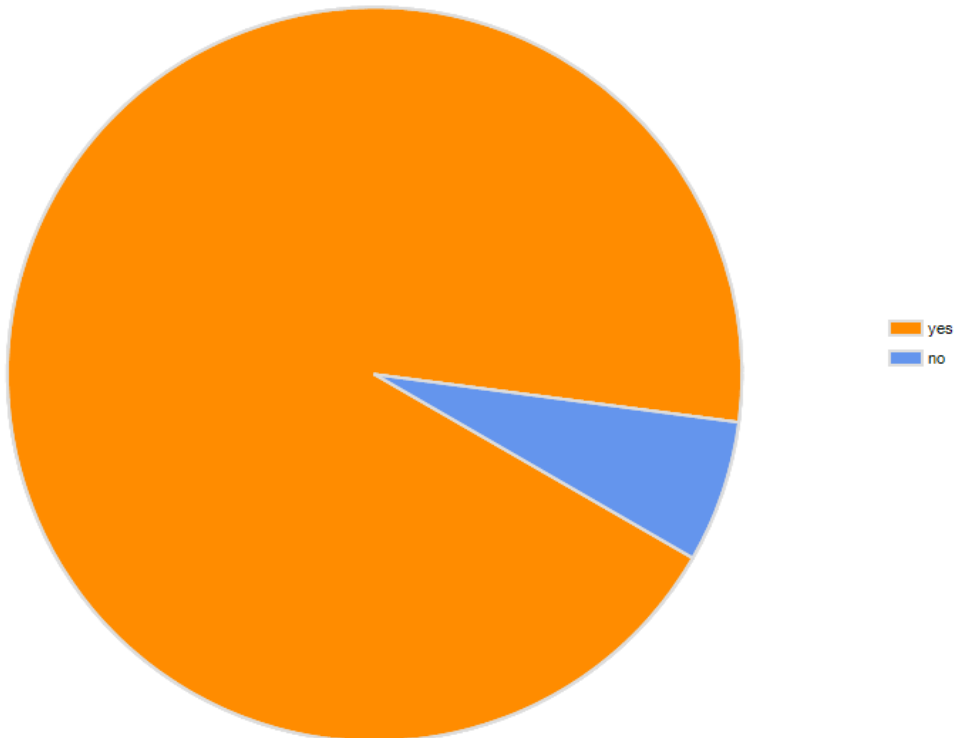
Other: 10
 Answered Question: 39
 Skipped Question: 8

Other Responses for Question #1:

- 1) 59 certified law enforcement officers. This number reflects all law enforcement services provided at three courthouses (Adult Criminal, Juvenile and Civil Courthouses).
- 2) 60
- 3) DNA Clerk Camera Monitor
- 4) Total of 16 for courts and intake
- 5) 5 sworn certified law enforcement officers & 1 sworn certified corrections officer
- 6) 65
- 7) 60
- 8) 45-50
- 9) 50 full-time certified, 7 Part-time Certified
- 10) 164

Question #

Are your Court Services Officers armed in the courtroom? If no, explain why.



Response Percent/Count:

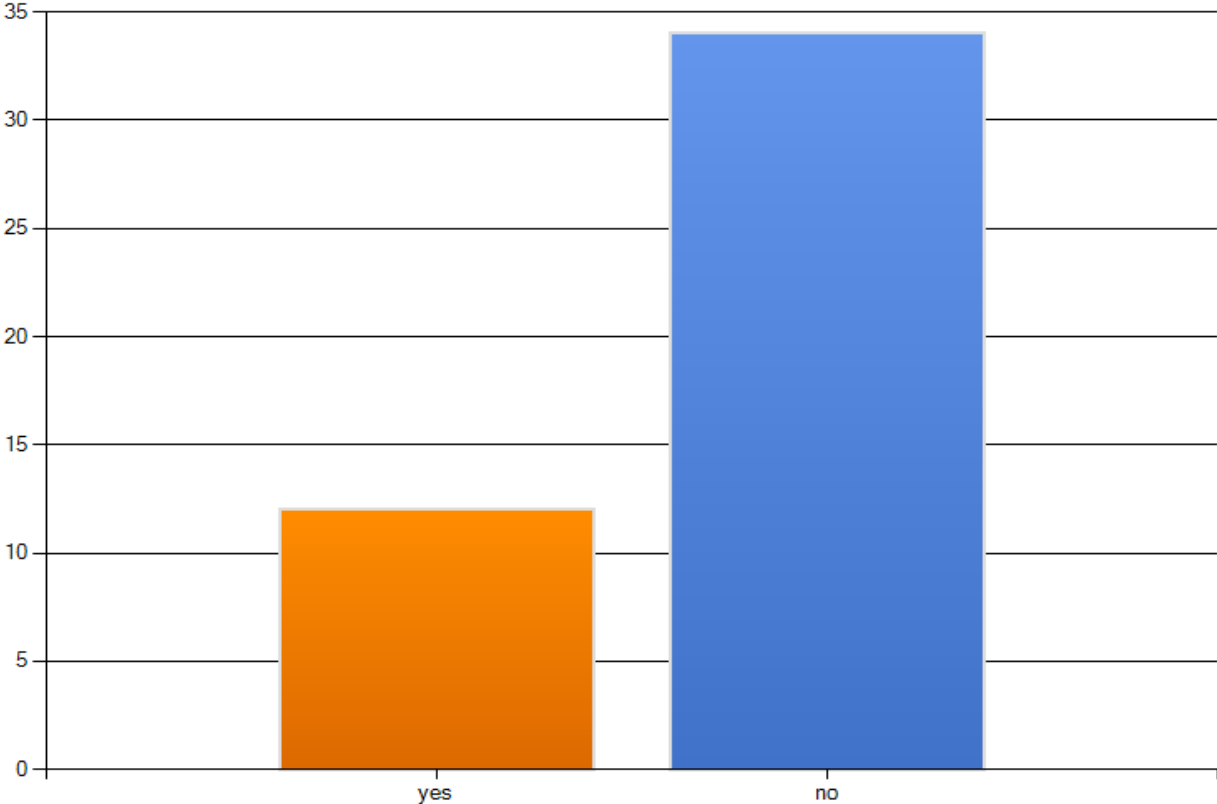
Information	Response percent	Response count
Yes	95.70%	45
no	6.40%	3
Other:		3
Answered Question:		47
Skipped Question:		0

Other responses for Question #2:

- 1) They are not certified LEO's. The civilian position of Court Support Officer (CSO) was created to save money (lower salary/benefits) achieved by pairing a CSO with an armed deputy. If we were going to train and arm them, we would use deputies.
- 2) Officers assigned to the Judge are but officers working inmates are not.
- 3) We have civilian bailiffs assigned to the courtrooms. Armed deputies patrol the judicial complex, and are available for calls.

Question #3

Do you have non-certified personnel (paid or unpaid) providing security in a courtroom?



Response/Percent Count:

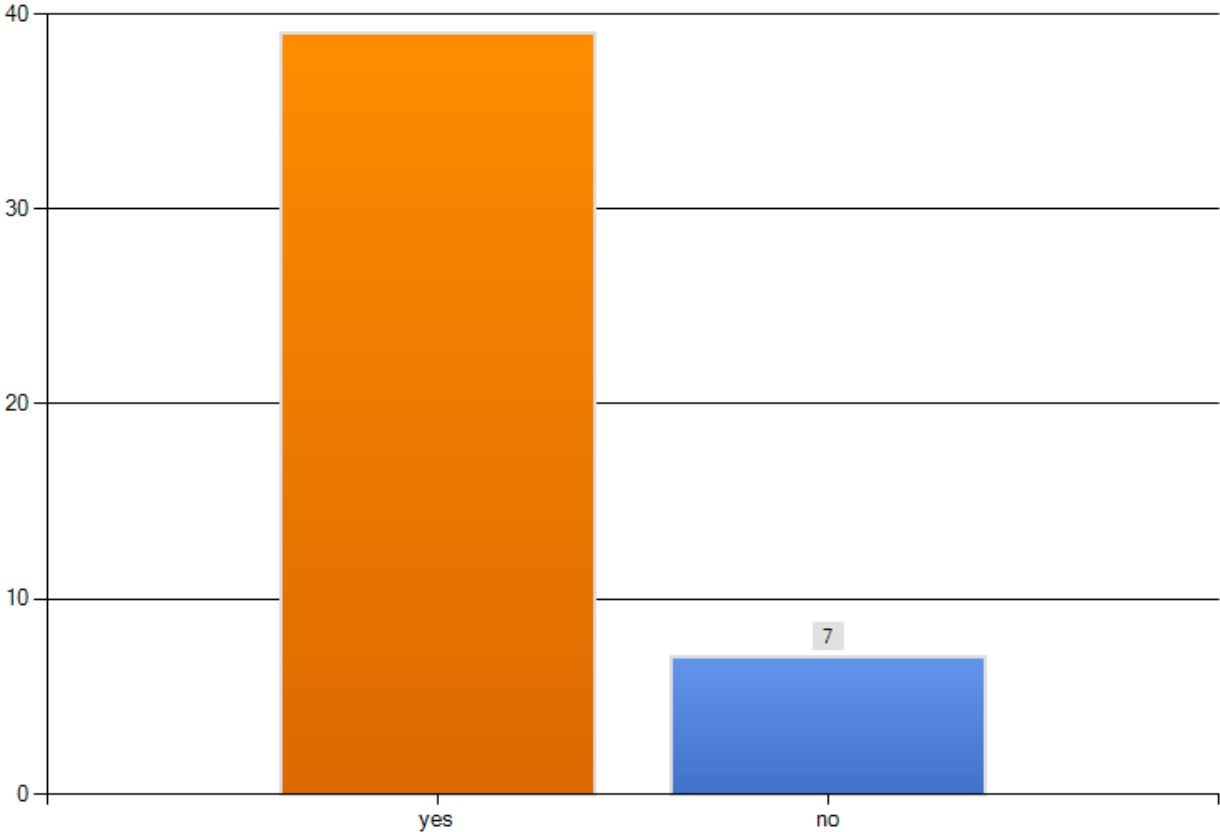
Information	Response percent	Response count
Yes	26.10%	12
No	73.90%	34
Other:		9
Answered Question:		46
Skipped Question:		1

Other responses for Question #3

- 1) Our bailiff is non-certified
- 2) Volunteers to assist Certified Bailiffs.
- 3) Assigned to the jury.
- 4) We utilize civilian "on-call" court assistants to help in courtrooms with non-law enforcement duties.
- 5) Civilian Bailiffs' (paid)
- 6) Civilian bailiffs are assigned to provide information and to check walk0ins as they enter the courtrooms, security application is limited.
- 7) CSO's are paired with a deputy sheriff. Most often CSO's work at the entrances operating screening equipment, or monitoring security cameras.
- 8) They assist certified officers and are used in Magistrate Courts.
- 9) However, we do use non-certified to assist certified deputies at the controlled access point to help with the X-Ray machine and putting items through the metal detector.

Question #4

Are law enforcement officers that are appearing in court for work- related obligations allowed to remain armed in the courthouse? If no, explain why.



Response/Percent Count:

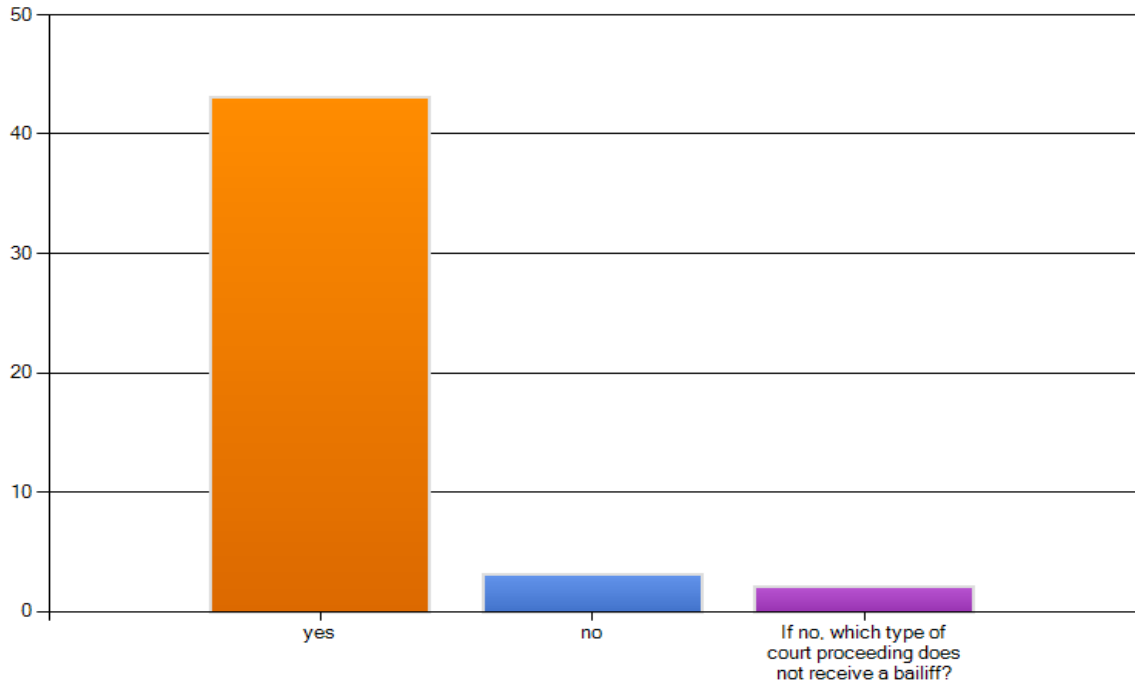
Information	Response percent	Response count
Yes	84.80%	39
No	15.20%	7
Other:		14
Answered Question:		46
Skipped Question:		1

Other responses for Question #4:

- 1) Trying to get approval for uniformed officers to remain armed when entering the courthouse.
- 2) They must be in uniform
- 3) Security reasons
- 4) Uniformed only
- 5) Only on official business. Officers on personal business must be unarmed.
- 6) Unless requested by the Judge
- 7) Only if they are wearing a clearly marked uniform and are on official business. All other LEO's in plain clothes (including our own) are required to check their weapons at the entrance.
- 8) The courtroom environment is the responsibility of the Judge. In our county, the Judges here only allow the Bailiff's to be armed.
- 9) Court Order.
- 10) Our Chief Judge did a survey of court related incidents and found that 98% (or so) were physical confrontations rather than armed. We have requested a review of that order and it is currently being looked at and possibly re-written. It is the "once in a life time" incident (active shooter) that we have to be prepared for as much as being prepared for the numerous physical confrontations that we already deal with.
- 11) Uniformed Law Enforcement personnel with valid identification on their person.
- 12) Per the Chief Judges order, only X County assigned officers are allowed to remain armed in the courthouse.
- 13) Administrative Order by the Chief Judge
- 14) Uniformed officers only.

Question #5

Do you provide security (bailiffs) in all court proceedings? If no, which type of court proceeding does not receive a bailiff?



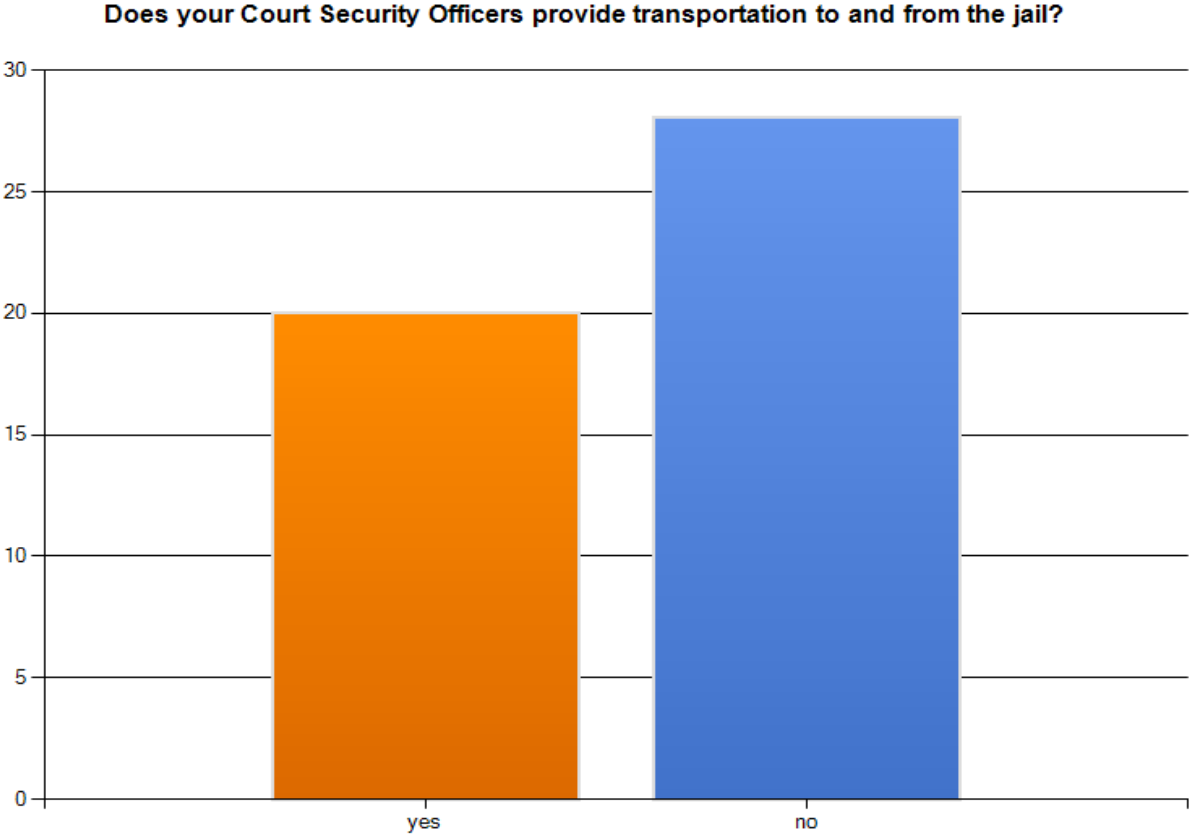
Response/Percent Count:

Information	Response percent	Response count
Yes	91.50%	43
No	6.40%	3
If no, why?	4.30%	2
Other:		5
Answered Question:		47
Skipped Question:		0

Other responses Question #5:

- 1) We currently have one remaining bailiff in our Court Services Division. We require certified law enforcement officers within each court proceeding.
- 2) Some mediation hearings do not require a bailiff.
- 3) Mostly yes, man-power permitting.
- 4) We do not attend Code Enforcement hearings. This may change only as a case by case basis. Not required by statute.
- 5) Civil hearings are staffed only as requested per sitting Judge, all others are staffed fully.

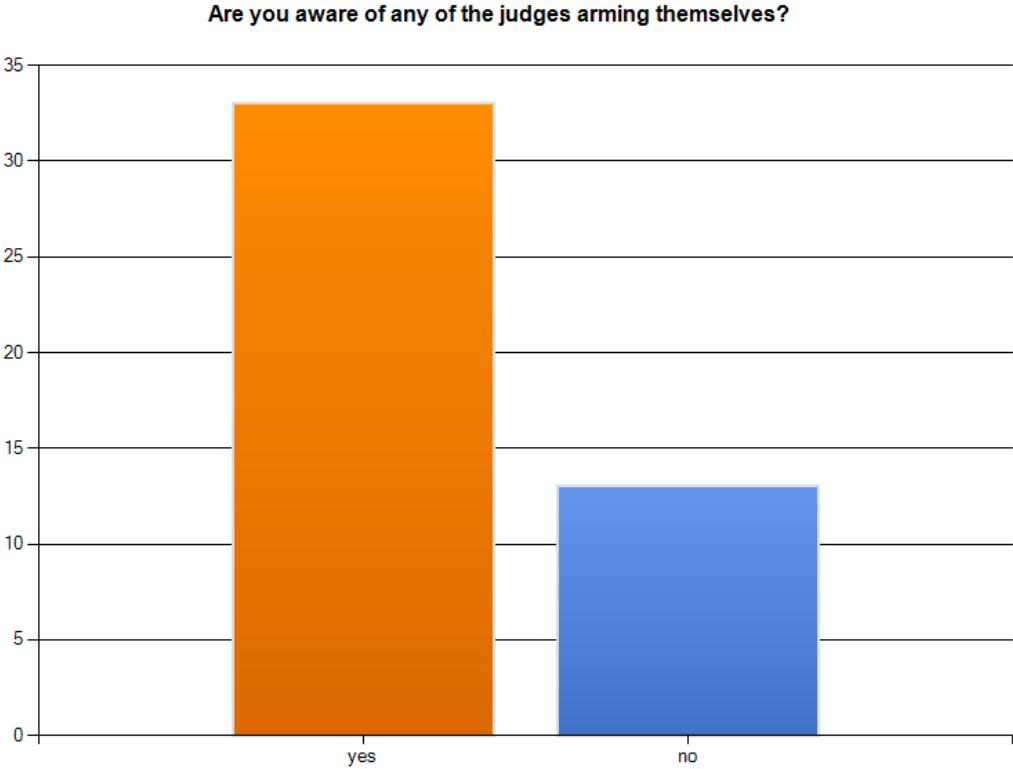
Question #6



Response Percent/Count:

Information	Response percent	Response count
Yes	42.60%	20
No	59.60%	28
Other:		0
Answered Question:		47
Skipped Question:		0

Question #7

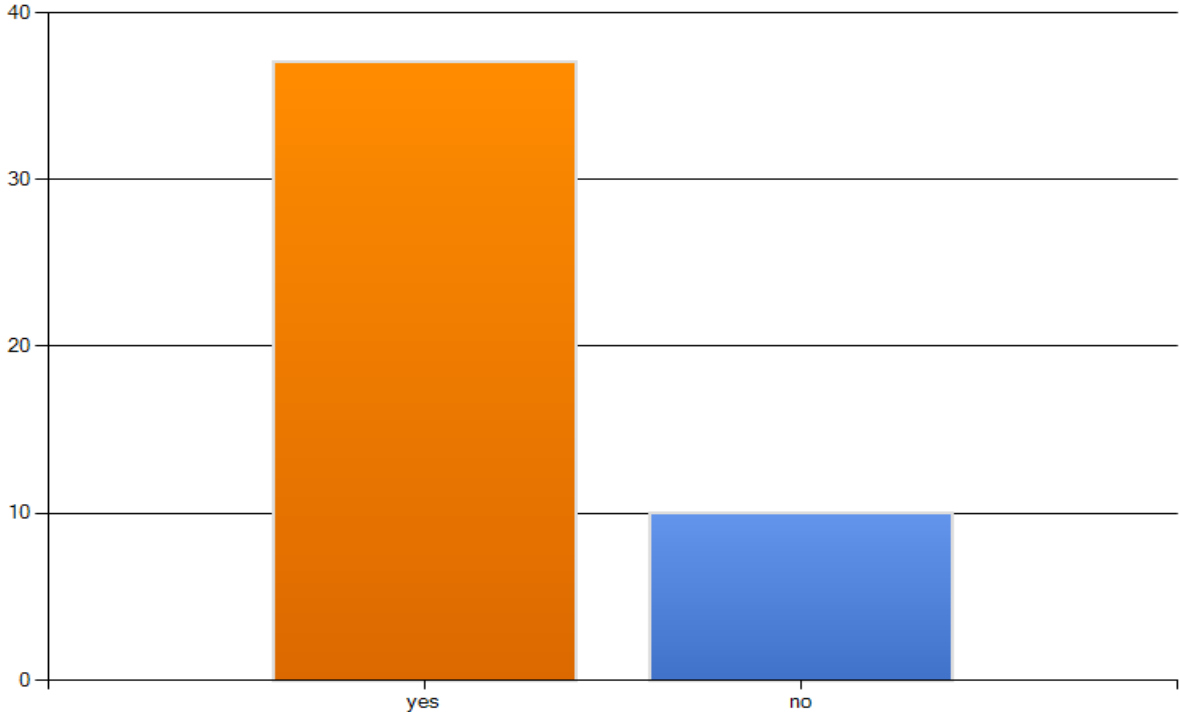


Response Percent/Count:

Information	Response percent	Response count
Yes	71.70%	33
No	28.30%	13
Other:		0
Answered Question:		46
Skipped Question:		1

Question #8

Since 09-11, have you implemented any increases in security to the courthouse, such as adding additional personnel or changing any aspect of the courthouse?



Response Percent/Count:

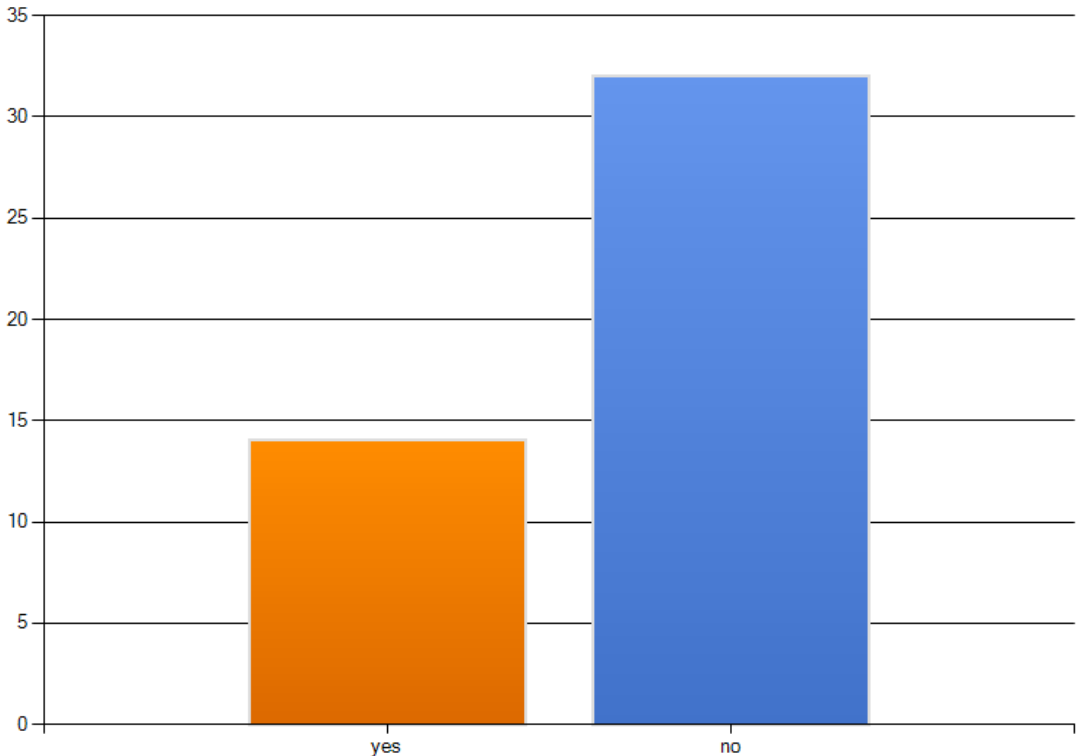
Information	Response percent	Response count
Yes	78.70%	37
No	21.30%	10
Other:		16
Answered Question:		47
Skipped Question:		0

Other responses for Question #8:

- 1) Hand-held scanners, booth scanners, and a video surveillance system.
- 2) Upgrade to outside security and some new procedures.
- 3) Cameras at all entrances, Metal detector, X-ray machine.
- 4) Limited access and security passes. No fluids of any kind and stricter regulations on items that can be brought in by civilians and employees.
- 5) We have started using volunteers to supplement staff. They do not take a position away, they just help.
- 6) Upgraded the duress system from signal going to a monitor to wireless radio signal that goes to each officers radio with voice prompted indicating which office has a problem.
- 7) Tighter rules, increased awareness training.
- 8) Clerk of Court has not provided any security at all.
- 9) X-ray machine, Metal detector & Security entrance officer.
- 10) Entry into the courthouse is screened by Courthouse security who works for the Department of Corrections. This group answers to the County Manager, not the Sheriff.
- 11) Improved camera systems, Judges secured parking area, equipped main entrances with ballistic panels for protection, install concrete structures to prevent a vehicle from driving in the main entrance, computer card entry systems (prox card), employee ID cards displayed.
- 12) The security check points have been relocated from the entrances to the courtrooms to the two entry/exit points within the main lobby.
- 13) Added personnel, metal detectors, X-Ray machines and hand wand. Made one "CAP" Controlled Access Point for all visitors. One point of entry for all employees.
- 14) Better equipment and X-Ray all hand carried items.
- 15) No extra personnel have been added, but security procedures have been tightened.
- 16) Place all certified deputies in the courthouses.

Question #9

Have you lost any positions due to budget restrictions? How many?



Response Percent/Response Count:

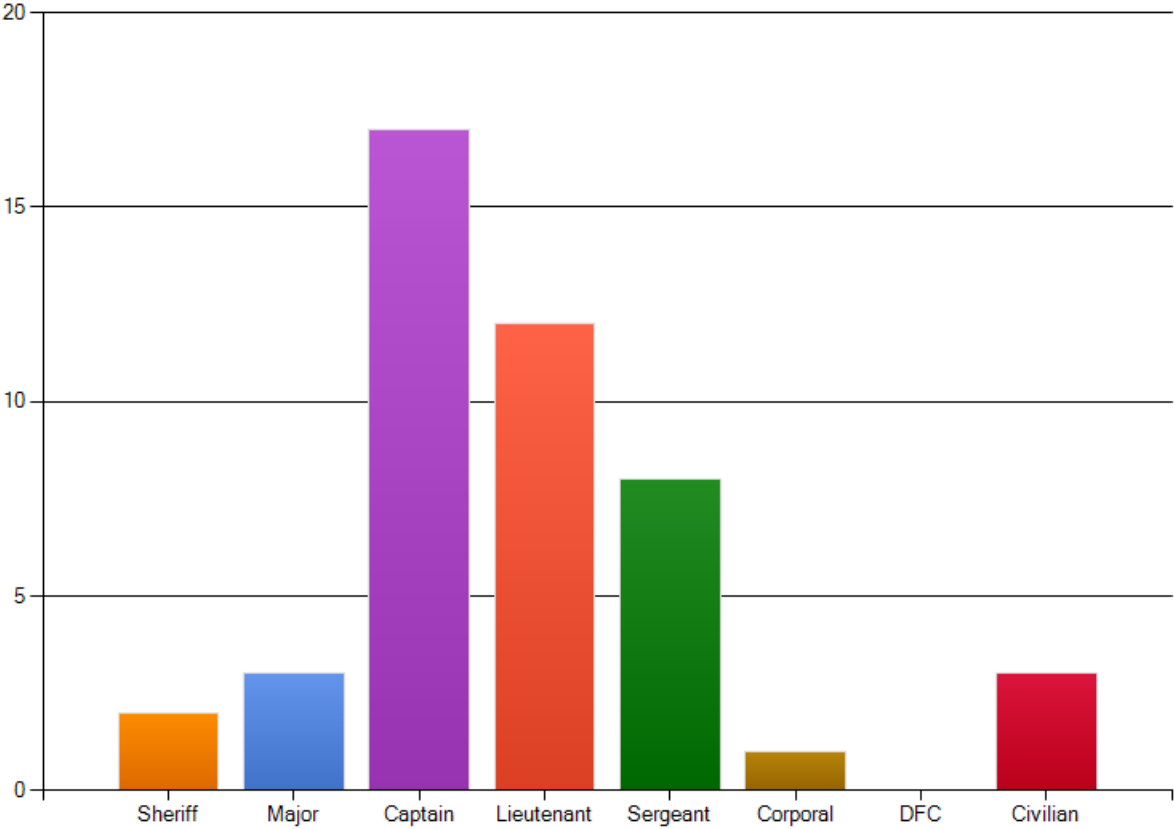
Information	Response percent	Response count
Yes	30.40%	14
No	69.60%	32
Other:		18
Answered Question:		46
Skipped Question:		1

Other responses for Question #9:

- 1) I can't say that we lost any positions, but we may not have gotten some new positions due to budget restrictions.
- 2) 5
- 3) 2 full-time and 3 part-time
- 4) 4
- 5) 5
- 6) One position has not been refilled after it was vacated.
- 7) One
- 8) 5 position
- 9) We have had to increase due to additional Judges in the past couple of years. In some cases we have had to pull units from our Warrants Unit to cover court proceedings. We have not added any personnel this year.
- 10) Two in the last 5 years regarding Bailiffs although we have two Detention Deputies assigned to courthouse full time. They transport inmates between the Jail and the courthouse which is across the parking lot, and adjoined by an enclosed walkway. In addition, they operate the holding cells during court sessions. The detention deputies are armed and we do utilize them for other court functions (supplement bailiffs) as needed and when possible within the building.
- 11) 6
- 12) 2, but we have added 1 part-time within the last 2 weeks
- 13) But that is a good possibility this year.
- 14) We opened a new 9 story Judicial Center, May 2008. We moved from a 2-story Courthouse with two off-site courtrooms. We initially needed to go from 44 deputies/employees to 84. After numerous talks and re-evaluating personnel, we opened the new courthouse with 63 deputies and non-certified employees.
- 15) Two
- 16) Not yet
- 17) 1 bailiff and 1 civilian

Question #10

What is the rank of the person who is completing this survey?



Response Percent/Count:

Information	Response percent	Response count
Sheriff	4.30%	2
Major	6.50%	3
Captain	37.00%	17
Lieutenant	26.10%	12
Sergeant	17.40%	8
Corporal	2.20%	1
DFC	0.00%	0
Civilian	6.50%	3

Jennifer Scott has been with the Charlotte County Sheriff's Office since 1990. She has worked in Communications as a dispatcher for Law Enforcement and Fire/EMS, and has worked in the Civil Division since 1994. Jennifer is currently the Courts/Legal Administrator, and oversees the Civil Division, Court Security Unit, Domestic Violence Unit, and the Court Liaison. Jennifer graduated from Lynn University with a bachelor's degree in Criminal Justice, and two minors, one in Emergency and Disaster Management and one in Psychology.

References:

110th Congress: Judicial Disclosure Responsibility Act. (2007). *H.R. 1130: Judicial Disclosure Responsibility Act*. Retrieved February 8, 2010, from GovTrack.us:
<http://govtrack.us/congress/bill.xpd?bill=h110-1130&tab=summary>

Associated Press. (2010, January 4). *Judges, prosecutors see threats double- Justice Department's inspector general also finds many aren't reported*. Retrieved February 8, 2010, from MSNBC.com:
http://www.msnbc.msn.com/id/34687454/ns/us_news-crime_and_courts/

Associated Press. (2005, August 9). *Officer Killed in Tenn. Courthouse Shooting*. Retrieved February 22, 2010, from FOX News: http://www.foxnews.com/printer_friendly_story/0,3566,165199,00.html

Green, S. J. (2005, June 20). *Man fatally shot at federal courthouse in Seattle*. Retrieved February 4, 2010, from The Seattle Times:
http://seattletimes.nwsourc.com/localnews/2002342068_webshooting20.html

Hainey, K. (2003, July). *Guns, Courts, and Civil Liberties. Bench & Bar of Minnesota- Official Publication of the Minnesota State Bar Association*, 60 (6), pp. 1-

Jeremy Travis, Director. (1997). *Court Security and the Transportation of Prisoners. National Institute of Justice Research Preview*, 1.

Kanigher, S. (2010, January 5). *Even courthouse designed for safety can be compromised*. Retrieved February 4, 2010, from Las Vegas Sun: <http://www.lasvegassun.com/news/jan/05/even-courthouse-designed-safety-can-be-compromised.com>

Kanigher, S. (2010, January 7). *Nevada to study courthouse safety in wake of shooting*. Retrieved February 4, 2010, from Las Vegas Sun: <http://www.lasvegassun.com/news/2010/jan/07/state-study-courthouse-safety-across-nevada/>

Lavoie, D. (2010, January 11). *Budget Cuts Force Tough Choices with Court Security*. Retrieved February 3, 2010, from LawOfficer.com: http://www.lawofficer.com/news-and-articles/news/2010/01/budget_cuts_force

Mansfield, D. (2009, March 10). *Tenn. man pleads guilty in courthouse shooting, guards death*. Retrieved February 22, 2010, from PoliceOne.com News:
http://www.policeone.com/pc_print.asp?vid=1794970

Press, A. (2010, January 7). *Feds to review courthouse security nationwide*. Retrieved January 22, 2010, from Policeone.com News: http://www.policeone.com/pc_print.asp?vid=0987058

Sharp, S. (2009, August 21). *Roane Courthouse shooting spurs sally port construction*. Retrieved February 22, 2010, from WBIR.com: <http://www.wbit.com/news/local/story.spx?storyid=96678>