

PREA INVESTIGATOR CERTIFICATION

COMPLETED PREA INVESTIGATION PACKAGE

Full SHIELD Framework Sample: S - H - I - E - L - D

FICTIONAL COMPLETED CASE FILE

PREA Case	PRDC-PREA-26-044
Related Police Case	PPD-26-0917
Facility	Pine Ridge Detention Center (fictional)
Alleged Victim	Daniel Reyes, Inmate #458217
Alleged Perpetrator	Terrence Cole, Inmate #391044
Allegation	Coerced oral sexual contact, three occurrences over approximately one month
Investigator	Det. Sarah Bennett #228
Final Administrative Finding	SUBSTANTIATED
Case Closed	December 15, 2026

This is a completed sample investigator package, not a practice exercise. It demonstrates one defensible way to organize a PREA investigation through all six SHIELD lanes. It is not a federally mandated form set and must be adapted to agency policy, state law, prosecutor direction, and local records requirements.

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TAB 1 - ADMINISTRATIVE COVER SHEET / EXECUTIVE SUMMARY

On September 9, 2026, inmate Daniel Reyes reported that inmate Terrence Cole coerced him into performing oral sex on three occasions, approximately August 11, August 24, and September 7, 2026. Reyes stated the conduct arose from an approximately \$80 commissary debt and that Cole used implied threats to compel compliance. The alleged conduct occurred inside a utility/storage alcove adjacent to the B-2 dayroom.

Camera B2-CAM-04 covered the corridor and alcove entrance but not the interior. Video for all three dates showed Reyes and Cole entering and leaving the area during periods generally consistent with Reyes's account. The footage did not depict sexual activity. Two witnesses provided circumstantial information. Andre Lewis observed the parties near the alcove on September 7 and described Reyes as unusually quiet afterward. Michael Soto knew of the commissary debt and heard Cole tell Reyes, "You still owe me. I'm going to collect." Neither witnessed sexual activity.

Cole acknowledged the debt and the private meetings but denied sexual contact, stating the alcove was used for prohibited commissary transactions. After the complete investigation and individualized credibility assessment, the allegation was administratively substantiated under the agency's assumed preponderance standard for this fictional sample. Potentially criminal conduct was referred for independent review.

TAB 2 - PRELIMINARY INCIDENT REPORT

Agency	Pine Ridge Police Department (fictional)
Report No.	PPD-26-0917
Reporting Officer	Officer James M. Carter #417
Date/Time	09/09/2026, 1438 hours
Location	Pine Ridge Detention Center, B-2 Pod
Disposition	Referred for PREA / criminal follow-up

Narrative

On September 9, 2026, at approximately 1438 hours, I responded to Pine Ridge Detention Center regarding a reported sexual assault involving two inmates. Sgt. Melissa Grant advised that Daniel Reyes disclosed that Terrence Cole forced him to perform oral sex on multiple occasions. Reyes and Cole had already been separated.

Reyes stated the acts occurred on or about August 11, August 24, and September 7 inside a utility alcove adjacent to B-2. Reyes stated he owed Cole approximately \$80 in commissary and that Cole told him, "You're going to pay me one way or another." Reyes said he feared physical assault if he refused. Reyes identified Andre Lewis and Michael Soto as potential witnesses but stated neither saw the sexual acts.

Medical personnel were notified. Camera B2-CAM-04 was identified as covering the corridor and entrance, and preservation was requested. Detailed investigative questioning was deferred to the specially trained investigator to reduce unnecessary repetitive interviewing. The case was referred to Det. Sarah Bennett #228.

TAB 3 - INVESTIGATOR ASSIGNMENT / CASE INITIATION

Assigned	09/09/2026, 1605 hours
Investigator	Det. Sarah Bennett #228
Initial Classification	Alleged inmate-on-inmate sexual abuse
Immediate Priorities	Safety, separation, medical access, retaliation protection, time-sensitive evidence preservation
Criminal Potential	Yes

Initiation Note

I reviewed the preliminary report, confirmed separation, and opened PRDC-PREA-26-044. No credibility or disposition determination was made at initiation. Objectives included developing the full chronology, preserving direct and circumstantial evidence, interviewing all relevant persons, testing alternative explanations, reviewing prior complaints involving Cole, assessing staff action or failure to act, determining an administrative finding, and coordinating criminal referral as appropriate.

S - SECURE AND SEPARATE

S-1 Secure / Separate Action Plan - COMPLETED

Initial Risk	HIGH
Victim Safety	Reyes removed from contact with Cole; non-punitive protective housing/classification review initiated
Accused Housing	Cole moved to separate housing
No Contact	Direct and indirect contact prohibited pending review
Medical	Notified 09/09/26; assessment completed
Behavioral Health	Confidential follow-up offered and accepted
Evidence Control	Alcove identified; video preservation immediately initiated
Information Control	Witness identities and allegation details restricted to need-to-know

S-2 Retaliation Monitoring Plan - COMPLETED

Monitoring Start	09/09/2026
Monitored Person	Daniel Reyes; witness status also reviewed
Responsible Official	Lt. Karen Holt
Indicators	Threats, intimidation, assault, property/commissary interference, disciplinary/housing/program changes, indirect
Duration	90-day monitoring completed; extension not indicated
Outcome	No verified retaliation identified
Closed	12/08/2026

H - HEAR AND CLASSIFY

H-1 Neutral Initial Contact Documentation - COMPLETED

Source	Verbal disclosure by Reyes
Core Allegation	Cole coerced Reyes into performing oral sex on three occasions
Dates	08/11, 08/24, 09/07/2026
Location	B-2 utility/storage alcove
Potential Witnesses	Andre Lewis; Michael Soto
Immediate Unknowns	What occurred inside alcove, precise coercive conduct, corroborating records, staff awareness, prior similar com

H-2 Classification Decision + Rationale - COMPLETED

Classification	Inmate-on-inmate sexual abuse allegation
Conduct	Mouth-to-penis contact
Consent/Coercion	Reyes alleges nonvoluntary compliance due to implied threat/fear of assault
Rationale	If established, alleged conduct meets PREA inmate-on-inmate sexual abuse definition
Finding at this Stage	None

H-3 Routing / Coordination Note - COMPLETED

Administrative Investigation	Opened
Criminal Coordination	Potential criminal offense flagged for referral
Medical / Mental Health	Completed
Classification / Housing	Safety review completed
PREA / Command	Required notifications completed

I - IDENTIFY RISK AND PRESERVE EVIDENCE

I-1 Evidence Preservation Plan - COMPLETED

Category	Evidence / Action
Video	B2-CAM-04 all three dates; adjacent camera availability checked
Scene	Alcove photographed/diagrammed; blind spot documented
Records	Housing, movement, commissary, post/rounds, classification
Communications	Available phone/tablet records queried
Medical	Post-report assessment obtained
Prior Complaints	Cole's prior PREA complaint history reviewed
Interviews	Victim, witnesses, staff, accused

I-2 Video / Digital Retention and Review - COMPLETED

Date	Observed	Meaning
08/11	Reyes enters 1942; Cole 1943; Cole exits 1950; Reyes 1951	Presence, sequence, opportunity only
08/24	Cole enters 2014; Reyes 2016; Reyes exits 2024; Cole 2025	Repeated private meeting; no view inside
09/07	Converse 1907; Reyes enters 1909; Cole 1910; Cole exits 1918; Reyes 1919	Reyes 1919 corroboration; no sexual act visible

Evidence limitation: Video does not establish sexual contact, consent, nonconsent, or coercion. It corroborates presence, timing, sequence, and opportunity.

I-3 Chain-of-Custody Log - COMPLETED

Item	Description	Collected / Stored
001	B2-CAM-04 08/11 video	09/09, Bennett; Digital Evidence Vault
002	B2-CAM-04 08/24 video	09/09, Bennett; Digital Evidence Vault
003	B2-CAM-04 09/07 video	09/09, Bennett; Digital Evidence Vault
004	Reyes commissary history	09/10; case exhibit
005	Cole commissary history	09/10; case exhibit
006	Housing/movement logs	09/10; case exhibit
007	Medical assessment	Restricted exhibit
008	Scene photos/diagram	Digital Evidence Vault
009	Post/rounds logs	Case exhibit

E - EXAMINE THROUGH STRUCTURED INQUIRY

E-1 Interview Sequencing Map - COMPLETED

Order	Person / Step	Purpose
1	Daniel Reyes	Full independent victim account
2	Andre Lewis	Test Sept. 7 observations
3	Michael Soto	Test debt and collection language
4	Housing staff	Access, rounds, supervision, prior concerns
5	Evidence reconciliation	Compare statements with video/records
6	Terrence Cole	Obtain independent accused account
7	Follow-up	Resolve material conflicts

E-2 Interview Plan - COMPLETED

Victim	Chronology; coercive words/actions; ability to refuse; debt; delay; threats; evidence/witnesses
Witnesses	Personal observations only; exact words; relationship/bias; limits of knowledge
Accused	Relationship; debt; reason for three private meetings; threats; sexual contact; fabrication theory
Staff	Access controls; rounds; blind spot; interactions; prior concerns; post-order compliance
Strategy	Preserve independent recollection; withhold unnecessary evidence details until independent accounts obtained

E-3 Question Bank - COMPLETED

Reyes: Tell me what happened from the beginning. What did Cole say or do that made you believe you had to comply? Describe each occurrence separately. Why did you wait to report? Who or what could confirm any portion of your account?

Lewis/Soto: Describe only what you personally saw or heard. What exact words were used? What did you believe they meant at the time? What did you not observe?

Cole: Describe your relationship with Reyes. Why were you together privately on each date? What was the debt? Did sexual contact occur? Did you threaten or pressure him? Why do you believe the allegation was made?

E-4 Timeline Worksheet - COMPLETED

Date	Event	Source
Late July	Reyes begins borrowing commissary	Both parties; records
08/11	First alleged occurrence	Reyes; video opportunity
08/24	Second alleged occurrence	Reyes; video opportunity
~09/01	"You still owe me. I'm going to collect."	Soto
09/07	Third alleged occurrence	Reyes; video; Lewis
09/09	Disclosure / initial response	PPD/facility records
09/10-18	Interviews/evidence collection	Case file

COMPLETED INTERVIEW REPORTS

Daniel Reyes - Alleged Victim

Reyes stated he began borrowing commissary from Cole in July and owed approximately \$80 by early August. On August 11, Cole demanded payment. When Reyes said he could not pay, Cole allegedly stated, "You're going to pay me one way or another," directed him to the alcove, and instructed him to perform oral sex. Reyes said he complied because he feared assault. He described similar incidents on August 24 and September 7. He denied consensual sexual activity and stated fear and embarrassment caused the reporting delay. He acknowledged the debt and that neither identified witness saw the sexual acts.

Andre Lewis - Witness

Lewis saw Cole speaking seriously with Reyes on September 7, saw Reyes walk toward the alcove and Cole follow, and later described Reyes as "shook up," meaning quiet, avoiding eye contact, and returning directly to his bunk. Lewis did not witness sexual activity and received no disclosure that evening.

Michael Soto - Witness

Soto knew Reyes owed Cole commissary. About one week before September 7, Soto heard Cole tell Reyes, "You still owe me. I'm going to collect." Soto interpreted the statement as commissary-related. He did not witness sexual activity and had no independent knowledge of sexual contact.

Terrence Cole - Accused

Cole denied all sexual contact and coercion. He admitted the debt relationship and private meetings on dates generally matching the video. Cole stated the alcove was used for prohibited commissary transactions away from staff and said, "That's where we handled business." He denied threatening Reyes and claimed Reyes fabricated the allegation to avoid repayment.

L - LINK AND TEST THE EVIDENCE

L-1 Evidence Linkage Matrix - COMPLETED

Proposition	Supporting	Contrary / Limiting	Assessment
Private meetings occurred	Video; both parties	None material	Established
Debt existed	Both parties; records; Soto	Exact amount varies slightly	Established
Sexual contact occurred	Reyes; repeated private opportunity	Cole denies; no eyewitness/interior video	Disputed, circumstantially supported
Contact was coerced	Reyes; debt leverage; collection language	Cole denies; Soto interpreted language as debt collection	Disputed, supported by totality
Fabrication motive	Cole alleges debt avoidance	No independent proof; Reyes admits debt	Possible, not established
Meetings were only commissary	Cole denies sexual contact	No independent proof this explains all encounters	Plausible alternative, not fully corroborated

L-2 Corroboration / Contradiction Analysis - COMPLETED

Reyes's account was corroborated in limited but material respects: the parties' repeated presence at the identified location, the debt relationship, collection pressure, and circumstances surrounding the September 7 encounter. None of those items independently proves sexual contact. Cole's denial directly conflicts with Reyes on the central issue. Cole's alternative commissary explanation is plausible and was retained as a competing hypothesis rather than dismissed.

L-3 Individualized Credibility Assessment - COMPLETED

Reyes: materially consistent core account; dates/location substantially match video; admits unfavorable debt conduct; delay explained; no direct eyewitness/video of act; possible debt-related motive considered.

Cole: admits observable facts and debt; consistently denies sexual contact; gives plausible alternative explanation; explanation not independently established as sole purpose of all three encounters.

Lewis: limits statement to personal observations; does not claim to see sexual activity; no developed motive to fabricate.

Soto: corroborates debt and collection statement while explicitly giving a nonsexual interpretation; no developed motive to fabricate.

L-4 Evidentiary Gaps / Alternative Explanation Review - COMPLETED

Gap / Alternative	Investigative Treatment
No interior camera	Documented as material limitation; no inference that video depicts assault
No eyewitness to sexual act	Documented; witness evidence treated as circumstantial
No dispositive biological evidence	Documented; absence not treated as proof of falsity
Delayed report	Reason explored and documented; not used automatically against credibility
Cole's commissary explanation	Compared against repeated pattern, records, witnesses, and Reyes's account
Potential fabrication motive	Considered; no independent evidence established fabrication

L-Lane Conclusion

The evidence does not produce direct visual or eyewitness proof of the sexual acts. It does, however, produce a coherent circumstantial structure that materially corroborates portions of Reyes's account while leaving the central act disputed. The case therefore turns on the weight of the total evidence under the applicable administrative standard, not on any single piece of evidence.

D - DETERMINE FINDINGS AND DOCUMENT

D-1 Administrative Finding / Closure Checklist - COMPLETED

Allegation	Cole coerced Reyes into performing oral sex on three occasions
Administrative Standard	Preponderance of the evidence
Finding	SUBSTANTIATED
Finding Date	10/05/2026
Investigator	Det. Sarah Bennett #228
Supervisor	Lt. Karen Holt #104

Finding Rationale

The allegation was substantiated for administrative purposes based on the totality of evidence. Reyes gave a materially consistent account identifying three dates, one location, the debt relationship, and alleged coercive conduct. Surveillance independently confirmed repeated private encounters at the exact location on all three dates and substantially matched his timing and sequence. Both parties confirmed the debt. Soto independently corroborated collection pressure. Lewis independently corroborated circumstances surrounding the third encounter and Reyes's post-event demeanor.

Cole's denial and alternative explanation were considered. The investigation also documented the absence of an eyewitness to sexual contact, the lack of interior video, the absence of dispositive biological evidence, and the delayed report. After weighing both supporting and limiting evidence, the investigator determined it was more likely than not that the alleged coerced sexual contact occurred. This administrative finding is not a criminal guilt determination.

D-2 Notifications / Referral Log - COMPLETED

Action	Date	Result
Victim outcome notification	10/06/26	Reyes privately informed allegation was substantiated
Criminal referral	10/06/26	Complete file forwarded for independent prosecutor/investigative review
PREA/Command notification	10/05-06/26	Required internal notifications completed
Classification safety review	Ongoing through closure	Continued separation/safety needs reviewed
Retaliation monitoring	09/09-12/08	90 days completed; no verified retaliation

D-3 Audit-Ready File Index - COMPLETED

#	File Component	Status
1	Initial report / referral	Complete
2	S-1 Secure/Separate	Complete
3	S-2 Retaliation monitoring	Complete
4	H-1/H-2/H-3 documentation	Complete
5	I-1/I-2/I-3 evidence documentation	Complete
6	E-1/E-2/E-3/E-4 inquiry documentation	Complete
7	Victim / witness / accused interviews	Complete
8	L-1/L-2/L-3/L-4 evidence analysis	Complete
9	D-1 findings	Complete

#	File Component	Status
10	D-2 notifications/referral	Complete
11	D-4 corrective action notes	Complete
12	Supervisory closure	Complete

D-4 Corrective Action Notes - COMPLETED

No evidence established deliberate staff facilitation. Review identified a facility vulnerability: repeated inmate access to an unmonitored alcove. Recommended corrective actions included restricting unauthorized access, evaluating camera positioning consistent with privacy requirements, reinforcing supervision expectations, and including the location in facility vulnerability reviews.

SUPERVISORY REVIEW / CASE CLOSURE

Required Interviews	Complete
Evidence Preservation / Review	Complete
Prior Complaint Review	Complete
Individualized Credibility	Complete
Staff Action / Failure-to-Act Review	Complete
Administrative Finding	Substantiated
Criminal Referral	Complete
Victim Notification	Complete
Retaliation Monitoring	Complete
Corrective Action Referral	Complete
Final Closure	12/15/2026

Supervisor Closure Note

I reviewed the initial report, all SHIELD lane documentation, interview reports, evidence and chain-of-custody records, linkage and credibility analyses, administrative finding, criminal referral, victim notification, retaliation monitoring, corrective action notes, and file index. The fictional sample file is administratively complete and closed.

Lt. Karen Holt #104

Electronically signed 12/15/2026

PREA STANDARDS REFERENCE NOTES

Reference	Application in Sample
28 C.F.R. § 115.71	Prompt, thorough, objective investigation; evidence collection; electronic monitoring; interviews; prior complaints; individualized credibility;
28 C.F.R. § 115.72	Administrative evidentiary standard may not exceed preponderance.
28 C.F.R. § 115.67	Retaliation protection and monitoring incorporated.
28 C.F.R. § 115.73	Victim notified whether allegation was substantiated, unsubstantiated, or unfounded.

This sample is a training/reference model, not a substitute for agency policy, legal advice, state criminal procedure, prosecutor direction, collective bargaining requirements, or local records rules.

END OF COMPLETED SAMPLE CASE FILE