

Missing The Mark: Evaluating Reality Television's Controversial Relationship with Policing in the United States

Kailee Lloyd

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Missing the Mark: Evaluating Reality Television’s Controversial Relationship with Policing in the United States

*Kailee Lloyd**

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INTRODUCTION

Police-centered entertainment has been a staple in American culture for decades. When thinking about this type of media, for many, the hit television show *COPS* first comes to mind. Since its premiere on FOX in 1989, *COPS* has been instrumental in shaping the modern-day image and perception of policing in the United States. For the first time, the show allowed viewers around the world to gain a behind the scenes view into the world of law enforcement on duty as if they were on scene with them. Audiences were able to gain a front row seat to calls, chases, and arrests, quickly becoming captivated with the premise. The show garnered massive success in the years to follow. *COPS* soon developed a cult

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following around the world and inspired a plethora of similar shows with other agencies and in various locations.¹

In addition to its acclaim, however, *COPS* and its successors faced pushback as the world and the criminal justice system evolved. The shows have also been met with heavy criticism, with calls to cancel these shows revving up in 2020 in light of the Black Lives Matter protests around the country.² When *COPS* was pulled off the air and streaming services, several other networks followed suit, including A&E Network's cancellation of *LivePD*.³ In the midst of these debates, *LivePD*'s own on-camera incidents came to light, particularly the death of Javier Ambler during the show's partnership with the Williamson County Sheriff's Department in Texas. As a result, the show was yanked from production, and Texas introduced and enacted a new law prohibiting partnership between law enforcement and media for the purpose of filming reality television programming, ultimately putting an end to the creation of this style of show in the state.⁴

The recent Texas legislation raises several questions. Does reality television truly have a place in policing? How much regulation is permissible? Who stands to benefit from the partnership between law enforcement and media? Does the government have authority to prevent media from airing certain content? This Article attempts to address the budding disconnect in the reception of using interactions with police for the purposes of creating live television programs as well as the pros and cons of its use. Moreover, this Article aims to evaluate whether it is possible to walk the line between allowing producers to publicize their chosen content and protecting the integrity and safety of people involved in these encounters. In addition to the constitutional issues raised by both sides, a lack of a set standard throughout the country can be a concern moving forward. This Article will evaluate cases, legislation, and real-life encounters to understand the impact on those involved in these processes and suggest potential solutions.

1. "*Cops*" Makes TV Debut, HIST. CHANNEL, <https://www.history.com/this-day-in-history/cops-makes-tv-debut> [<https://perma.cc/UZX7-7J67>] (last visited Mar. 9, 2024).

2. Laurie Ouellette, *Cancelling Cops*, FILM Q (June 17, 2020), <https://filmquarterly.org/2020/06/17/cancelling-cops/> [<https://perma.cc/VAH2-HTRF>].

3. Allyson Chiu, '*Cops*' Hooked Viewers and Angered Critics for Decades. Now It's Canceled Amid Protests Over Police Brutality, WASH. POST (June 10, 2020 7:33 AM), <https://www.washingtonpost.com/nation/2020/06/10/cops-tv-reality-cancel/> [<https://perma.cc/AC4J-KX52>].

4. TEX. GOV'T CODE ANN. § 614.232 (West 2021).

Part I explores the historical evolution of the partnership between law enforcement agencies and television networks, from its promising start and rise in popularity to its eventual decline, which led to the cancellation of many modern programs. Further, Part I evaluates cases and notable incidents that shaped the legislation and standards for both reality television and the criminal justice system.

Part II analyzes the advantages and disadvantages of the reality television genre as well as constitutional concerns raised by both supporters and critics to its applicability in policing. Part II also attempts to address the concerns of distortion and misrepresentation of both law enforcement and the communities in which they operate. Finally, it analyzes the balance needed between the media's First Amendment protections and the right of subjects during these encounters.

Part III examines Texas's solution in detail to determine if it is accomplishing its intended outcome. This section also analyzes whether the Texas model can be adopted by other states or Congress. Part III also addresses other potential solutions to understand how to properly evaluate First Amendment concerns. Finally, it considers alternative solutions and approaches that may be more feasible.

I. BACKGROUND

COPS first premiered on FOX in early 1989 and quickly saw success with audiences. Created by John Langley and Malcom Barbour, the goal of the show was to allow a look into the "reality" of police work in different departments around the country, including not only their time on duty but also their personal lives.⁵ By the time the show met its 2020 cancellation, *COPS* was insanely popular with audiences, setting a trend for both police-based media and reality television as a whole: Prior to its cancellation, *COPS* aired over 1,000 episodes, filmed in 140 U.S. cities, and inspired a plethora of spin-off shows.⁶ What made *COPS* so unique at the time was its reintroduction of the media ride-along: a documentary style where journalists or camera crews accompany law enforcement into the field.⁷ With the popularity of *COPS*, there was a resurgence of the media ride-along.⁸ Through the partnership, viewers were allowed an even

5. "Cops" Makes TV Debut, *supra* note 1.

6. *Id.*

7. Hannah Shay Chanoine, *Clarifying the Joint Action Test for Media Actors When Law Enforcement Violates the Fourth Amendment*, 104 COLUM. L. REV. 1356 (2004).

8. Robert M. O'Neil, *Ride-Alongs, Paparazzi, and Other Media Threats to Privacy*, 33 U. RICH. L. REV. 1167 (2000).

closer look, existing as a “fly on the wall,” as if they were present with the officers. By utilizing this style, both parties benefit. The show is relatively cheap and easy to make. Filming does not require elaborate sets, lighting, or the cost of big-budget actors. Law enforcement as a whole (and individual departments) gain publicity and convey a positive narrative for public perception; the networks publicize the police encounters, ride the wave of popularity of the genre, and garner viewers and profits.⁹

COPS and the media ride-along were not spotless in terms of controversy. In 1999, the Supreme Court ruled on two cases factually centered around interactions between law enforcement, media, and a criminal suspect: *Wilson v. Layne* and *Hanlon v. Berger*.¹⁰ In *Wilson v. Layne*, the Court addressed a case involving the United States Marshals Service and local sheriff’s deputies, who while executing a search warrant, allowed representatives from a newspaper to accompany them inside the home.¹¹ In addressing the issue of the warrant not including the “ride-along”, the Court noted that “certainly the presence of reporters inside the home was not related to the objectives of the authorized intrusion ... [and] the reporters were not present for any reason related for police entry into the home”¹² Therefore, the media’s entrance into the private home during the search was a violation of constitutional rights protected under the Fourth Amendment.¹³ Chief Justice Rehnquist cautioned: “the *Washington Post* reporters in the ... [suspects'] home were working on a story for their own purposes. They were not present for the purpose of protecting the officers, much less the [suspects].”¹⁴

The Supreme Court additionally granted certiorari in *Hanlon v. Berger*, a case involving United States Fish and Wildlife Service special agents conducting a search of property in Montana accompanied by a crew from CNN.¹⁵ Respondents sued for damages under *Bivens v. Six Unknown Fed. Narcotics Agents*, the basis for damages against officers for constitutional violations, alleging that the aforementioned conduct violated the Fourth Amendment.¹⁶ The Court held that bringing

9. *Id.*

10. *See* *Wilson v. Layne*, 526 U.S. 603 (1999); *Hanlon v. Berger*, 526 U.S. 808 (1999).

11. *Wilson*, 526 U.S. at 605.

12. *Id.* at 1698.

13. *Id.*

14. *Id.* at 1699.

15. *Hanlon v. Berger*, 526 U.S. 808 (1999).

16. *Id.*

representatives from the media on a search was a Constitutional violation.¹⁷

In 2020, there was a major push toward police reform following the death of George Floyd after a police officer in Minnesota knelt on Floyd's neck while he was handcuffed.¹⁸ Additionally, protests erupted around the country calling for an end to shows seen as propaganda, also referred to as "copaganda." Shortly thereafter, Paramount Network announced they had no plans for *COPS* to return for a 33rd season, and A&E Network cancelled *LivePD*.¹⁹

During the filming of the latter, Javier Ambler was killed during a confrontation with the Williamson County Sherriff's Department in Texas. A lawsuit filed against Williamson County alleged that a deputy utilized his Taser multiple times and placed a knee on Ambler's back, inhibiting his breathing. Ambler died shortly thereafter, and his death was deemed a homicide by the Travis County medical examiner.²⁰ The lawsuit also noted that *LivePD* camera crews filmed Ambler's arrest and his interactions with Williamson County Sherriff's Department. The footage, however, was not found, and Sherriff Robert Chody was indicted for "destroying evidence related to Ambler's case including the video recordings made by LivePD."²¹

As a result, legislation was introduced in Texas seeking to ban further partnerships between law enforcement agencies and networks, and it was ultimately passed and signed by Governor Greg Abbott.²² Under Texas's new law, also known as Javier Ambler's law, "a law enforcement agency may not authorize a person to accompany and film a police officer acting in the line of duty for the purpose of producing a reality television program."²³ The law further elaborated through in its definition section, § 614.231, that:

(1) "Law enforcement agency" means an agency of this state or a political subdivision of this state that employs peace officers other than game wardens.

(2) "Reality television program" means a nonfictional television program that features the same live subjects over the course of

17. *Id.*

18. Chiu, *supra* note 3.

19. *Id.*

20. Ambler v. Williamson Cty., No. 1-20-CV-1068-LY, 2021 U.S. Dist. LEXIS 35905, at *3-4 (W.D. Tex. 2021).

21. *Id.*

22. TEX. GOV'T CODE ANN. § 614.232 (West 2023).

23. *Id.*

more than one episode primarily for entertainment purposes, but does not include reporting on a matter of public concern by a journalist as defined by Article 38.11, Code of Criminal Procedure.²⁴

This new legislation sparked new debate into whether other states should follow Texas's lead and end reality television cop shows within the United States. Critics firmly argue that the negatives on the individuals featured and the greater public that exist are far too plentiful to ignore. Supporters argue that filming and airing these programs promotes accountability and proper "naming and shaming" of those who commit crime in the United States. Part II of this paper will attempt to address who exactly benefits from the airing of these programs and conversely, who is being harmed as a result thereof.

II. ANALYSIS

When reality television enters the world of law enforcement, the line between reality and fiction becomes thin. At every step of the production, outside influence and biases could impact the process. Several issues exist in the perpetuation of this style of media, with the major concern being the privacy violation of suspects and promotion of misinformation regarding law enforcement and the communities they patrol.

In evaluating the method and use of the media ride-along moving forward, there are several questions. Should this type of show be allowed? If yes, in what capacity? If no, how should regulations be implemented? Who truly benefits from the continued use of this medium? When evaluating the complicated relationship between law enforcement and reality television, it is crucial to protect the suspect's rights without infringing on the First Amendment right of free press.

A. Concerns Regarding the Suspect and the Media

Each episode of *COPS* begins with a disclaimer that all suspects are presumed innocent. However, frequent television exposure of police interactions, especially on a highly viewed, long-run program like *COPS*, can perpetuate negative public perception. Encounters featured on the show are immortalized forever, showcased on reruns and other platforms, subjecting suspects to the perpetual court of public opinion. Further legal proceedings are rarely, if ever, mentioned or included in the program.

24. *Id.* at § 614.231.

Even then, regardless of the outcome, friends, family, and millions of people around the globe have seen the encounter and reached their own conclusions. Consent forms are frequently mentioned in regard to filming, but information surrounding them is hazy, at best. Unlike law enforcement who has some power to filter what makes the final cut, suspects on these shows are not afforded the same power. This raises concerns regarding a suspect's right to privacy as well as right of publicity. The right of publicity encompasses an individual's right to "control the commercial use of his or her identity."²⁵ There is currently no federal law surrounding the right of publicity, but states rely on prior case law and their own statutes.²⁶ The production of *COPS* and similar shows must be profitable for networks; otherwise, they would not have continued to produce and revive the shows even with controversy. One must consider the rights of the suspects depicted on the program and whether they consented, or were even able to consent, to the airing of the material worldwide.

The Supreme Court first evaluated privacy cases relating to the police and media partnership in 1999 in *Wilson v. Layne* and *Hanlon v. Berger*.²⁷ Both cases involved law enforcement agencies who, while in the process of executing search warrants, were accompanied by media crews. Both cases addressed the warrant subjects' rights afforded under the Fourth Amendment, which protects against unreasonable searches and seizures.²⁸ The Court in both cases found that the "ride-alongs" violated the constitutional rights of the subjects protected under the Fourth Amendment of the United States Constitution.²⁹ However, television networks continued to work around these new restrictions following the Supreme Court cases, namely through focus on traffic stops rather than into the suspect's home.

Another case regarding the airing of content gained by the "media ride-along" is *Best v. Berard*. The case involved a television program called *Female Forces*, a show operating similarly to *COPS* but focused solely on female officers.³⁰ The episode featuring Ms. Best showcased her completing a field sobriety test, as well as her face, her voice, and a close up on the officer's computer which contained her personal information.³¹ Ultimately, the district court found that Best had no privacy interest in the

25. MCCARTHY ON TRADEMARKS AND UNFAIR COMPETITION § 28:1 (5th ed. 2023).

26. *Id.*

27. *See Wilson*, 526 U.S. 603; *Hanlon*, 526 U.S. 808.

28. *See Wilson*, 526 U.S. 603; *Hanlon*, 526 U.S. 808; U.S. CONST. amend. IV.

29. *See Wilson*, 526 U.S. 603; *Hanlon*, 526 U.S. 808.

30. *Best v. Berard*, 837 F. Supp. 2d 933, 936 (N.D. Ill. 2011).

31. *Id.* at 937.

information that was shown on the episode of *Female Forces*.³² Further, the district court agreed with the network that the information conveyed was truthful and a matter of public concern, stating that the community had a vested interest in knowing about individuals and arrests in their area. Preventing the media from airing the content would ultimately be a violation of the First Amendment.³³

When discussing any type of media regulation, the rights guaranteed under the First Amendment should first be considered, particularly whether the government is abridging the freedoms of speech or press.³⁴ Media censorship is a slippery slope that courts are not willing (or able) to go down.

A potential benefit to the ride-along is the ability to hold officers accountable for their actions. Arguably, the same result could be obtained through the use of body camera footage, as required by police departments throughout the country. The Court in *Wilson v. Layne* rejected the argument that publication of material obtained through the media's accompaniment of officers served any purpose of ". . .publicizing the government's efforts to 'combat crime, and facilitate accurate reporting on law enforcement activities.'"³⁵

One major concern is that the media cannot be held liable for civil rights or constitutional violations like officers and their departments can be because 42 U.S.C. § 1983 does not apply to private individuals.³⁶ Claims can be brought against government officials under § 1983 which states:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress...³⁷

While acting under color of state law, police officers are subject to lawsuits under § 1983 for constitutional right violations. However,

32. *Id.* at 938.

33. *Best*, 776 F. Supp. 2d at 758.

34. U.S. CONST. amend. XIV.

35. *Wilson*, 526 U.S. at 612 .

36. 42 U.S.C. § 1983.

37. *Id.*

although the media can be viewed as working with the police, the public is not afforded the same methods to pursue remedies against this non-government entity, even where complicit in the government agent's unconstitutional act.

B. Other Concerns

Television is undoubtedly a powerful mode of communication. The broadcast of policing as “reality” could influence and skew public perception of law enforcement and the communities they interact with. Reality-television policing sets out to “[encourage] the viewer to identify with police, while distancing the viewer from other individuals who are portrayed.”³⁸ According to Mary Beth Oliver, a professor at Pennsylvania State University, “years of study shows that many people like the show because they enjoy the basic storytelling concept: a hero, a villain and ultimate justice ... [, and] there's a tendency for people to enjoy the process of comparing themselves to others who are worse off or who are made to look unintelligent or made to look silly”³⁹

In addition to the discrepancies surrounding crime, these shows oftentimes do not accurately represent real-world statistics, showcasing minority communities in a negative light. *COPS* remained selective of the groups they showcased, often disproportionately focusing on minority and poorer neighborhoods. The producers of a podcast titled “*Running From Cops*” watched nearly 1,000 episodes, gathering data and compiling statistics regarding what was featured.⁴⁰ Upon evaluating 90,000 data points compared to the FBI's Uniform Crime Reporting, they found that what was shown on television as “reality” was grossly inaccurate.⁴¹ Drug related crimes made up 35% of what was featured on *COPS* compared to 13% of crimes in the real world.⁴² Further, the arrest rate jumped to as high as 95% by Season 30 which was not reflective of any department in the

38. AARON DOYLE, *ARRESTING IMAGES: CRIME AND POLICING IN FRONT OF THE TELEVISION CAMERA*, at 42, (2003).

39. Claire Osborn & Tony Plohetski, *'Live PD' Says It Destroyed Video of Javier Ambler II's Death During 2019 Texas Police Stop.*, USA TODAY (June 23, 2020 3:38 PM), <https://www.usatoday.com/story/news/investigations/2020/06/10/live-pd-destroyed-video-police-killing-javier-ambler-ii-2019/5332903002/> [<https://perma.cc/ZS96-E65Z>].

40. Meredith Blake, *Cops: End of Watch*, LA TIMES, https://enews.paper.latimes.com/infinity/article_share.aspx?guid=74e13eb9-1bc4-4d89-ac4f-bfd84434e8c [<https://perma.cc/KWQ3-DXJ9>] (last visited Mar. 9, 2024).

41. *Id.*

42. *Id.*

United States.⁴³ Further, *COPS* appears to depict an unrealistic representation of *who* is committing these crimes.

As seen previously, despite utilizing the term “reality,” what is shown on television is often not reflective of real-world policing. During its tenure, *COPS*’s style maintained a “simple unambiguous narrative structure, pumped up action, heroic police protagonists, high arrest rate, and illusion of police certainty.”⁴⁴ Viewers of these programs, from the casual watcher to the avid fan, “may have little to no first-hand experience with crime and police.”⁴⁵ The viewer may not be able to differentiate fact from fiction and could see these programs as a true and accurate depiction of law enforcement as well as crime in the real world around them.⁴⁶ Representation of these programs as anything other than purely entertainment is dangerous. According to Gray Cavendar, a criminologist at Arizona State University, people who watch *COPS* are likely to hold the view that “there’s more crime than there actually is[,] . . . that black people commit more than they do[,] . . . and that police are better at catching perpetrators than they are.”⁴⁷

Further, turning police encounters with the public into entertainment adds the additional t.v. network requirement to maintain viewership and ratings. The idea that both the department and agency are able to shape and craft the final product before it airs to the viewer is particularly dangerous. The need to be accurate and reflective of real-world policing is frequently overshadowed by the need to maintain the show’s entertainment factor, guaranteeing continue interest and funding. It’s obvious that a department would value public perception, and these shows would not be possible if the network was unable to secure partnerships with law enforcement. Ultimately, both sides have incentive to keep the other happy.

The Marshall Project, a nonprofit news organization, evaluated several departments who partnered with *LivePD* and the show’s process for sorting and choosing footage for the program.⁴⁸ Often, clips deemed unworthy were discarded. In the investigation, they discovered that the

43. *Id.*

44. *Id.*

45. Theodore O. Prosise & Ann Johnson, *Law Enforcement and Crime on Cops and World’s Wildest Police Videos: Anecdotal Form and the Justification of Racial Profiling*, 68(1) WESTERN J. OF COMM’N 72, 73 (2004).

46. *Id.*

47. Tim Stelloh, *Bad Boys: How Cops Became the Most Polarizing Reality TV Show in America*, THE MARSHALL PROJ., (JAN. 22, 2018, 6:00 AM) <https://www.themarshallproject.org/2018/01/22/bad-boys> [<https://perma.cc/M66A-A7FU>].

48. *Id.*

show allowed agencies to request elimination of footage both before and after the program aired.⁴⁹ Howard Rosenberg of the *Los Angeles Times* stated, “[t]he collusion potential is enormous, with ‘reality’ series airing nothing they believe puts their partner subjects in a bad light. Doing so would cut off access. No access, no show.”⁵⁰

In an investigation into the Williamson County Sheriff’s Department—the previously mentioned department at the focus of the Javier Ambler case—the *Austin-American Statesman* found that car chases and use-of-force encounters increased since the department’s partnership with A&E Network for the filming of *LivePD*.⁵¹ The *Statesman* reported that they were told by several former detectives within the department that they had been instructed to rush investigations and warrants in order to make more interesting arrests for the LivePD cameras.⁵² Officers are carefully selected to be broadcast and may behave differently when placed behind a camera.⁵³ Ultimately, there exists no way to conduct checks and balances into human action to determine what is “real” or not. Mike Gleason, who was elected Sheriff of Williamson County following Robert Chody’s indictment, stated that, “it’s human nature to get a little western, you’re now concentrating on making good TV and not concentrating on protecting the civil rights of your community and your oath.”⁵⁴

49. Carly Aspinwall & Sachi McClendon, *Did “Live PD” Let Police Censor Footage?*, THE MARSHALL PROJ. (July 1, 2020, 5:00 AM), <https://www.the-marshallproject.org/2020/07/01/did-live-pd-let-police-censor-footage> [<https://perma.cc/TLZ8-SRYV>].

50. Howard Rosenberg, *High Court Gives Series Dose of Reality*, LOS ANGELES TIMES (May 26, 1999, 12:00 AM) <https://www.latimes.com/archives/la-xpm-1999-may-26-ca-40966-story.html> [<https://perma.cc/4EJ5-6S2J>].

51. Tony Plohetski, *Proposed ‘Javier Ambler Law’ Would Ban Reality TV and Police Partnerships*, AUSTIN AMERICAN-STATESMAN (Dec. 18, 2020, 9:55 AM), <https://www.statesman.com/story/news/2020/12/11/texas-police-brutality-javier-ambler-law-would-ban-live-pd-type-reality-show-deals/6508122002/> [<https://perma.cc/U2P7-FB3R>].

52. *Id.*

53. Robert A. Lawson & Kerianne Lawson, *Good Cops, Bad Cops, Whatcha Gonna Do?*, 31 J. OF PRIV. ENTER. 85, 87, 93 (2016).

54. Brittany Ford & Jordan Bontke, *New Williamson Co. Sheriff Reacts To Bill That Would Ban Police Contracts With Reality TV*, CBS AUSTIN (Nov. 10, 2020, 7:19 PM), <https://cbsaustin.com/news/local/new-williamson-co-sheriff-reacts-to-bill-that-would-ban-police-contracts-with-reality-tv> [<https://perma.cc/BPQ2-EVTA>].

III. PROPOSAL

The important question to ask is what should be done moving forward. Texas has implemented measures that have permanently halted the filming of this type of program, which raises the question of whether the rest of the United States should follow. Supporters of this type of show argue that they provide a real life look into law enforcement, which holds officers accountable, but the shows that have aired to date have a troubled history that leans the other direction. There are two options moving forward: either the laissez-faire option that has been utilized up until this point, or a path toward regulation like what Texas has implemented.

A great political divide exists in the United States, which heavily impacts the possibility for bipartisan legislation. Admittedly, a comprehensive legislative end to these shows would be time consuming to pass and to implement. However, steps need to be taken to ensure a proper balance between the media's rights and the rights of the individual, especially privacy. The use of body cameras would allow for more accountability without introducing real arrests as a storyline. This solution would provide more regulation and uniform clarity to ensure safety and protection of the freedoms of both the network and those involved in police encounters.

Cop shows, both reality-based and fictional, are unlikely to go away anytime soon. However, if the production of these programs is not the only way to achieve the desired goal of police accountability, then what is its purpose other than to make money for the t.v. network? The cost of the show's profitability is often paid by a sharp invasion into a suspect's privacy, making a spectacle out of those who are unfortunate enough to be stopped by an officer and ride-along.

CONCLUSION

Despite its many controversies, there is no question that the partnership between law enforcement and reality television remains a popular and profitable one. Despite controversy and prior cancellation, *COPS* found a new network to air its 34th season.⁵⁵ Additionally, even public backlash has done little to dissuade the loyal viewers from returning. *COPS* was nominated for an Emmy in both 1993 and 1994, the

55. See *All New COPS Season 34 Begins September 30th, 2022 on Fox Nation*, COPS.COM, <https://www.cops.com> [<https://perma.cc/475B-QWTF>].

years following the beating of Rodney King by the Los Angeles Police Department and the subsequent protests against law enforcement.⁵⁶

On paper, the reasoning for starting and continuing to maintain these shows sounds like a good idea: accountability, respect for law enforcement, and deterrence of crime. However, as it currently stands, the negative consequences outweigh the benefits. These shows walk a thin line between reality and entertainment at the cost of real people. The Court even addressed this in *Wilson v. Layne*, holding the benefits for police of positive publicity were “simply not enough... to justify the ride-along intrusion into a private home. . .”⁵⁷

The best solution would be to place a barrier to the partnership between law enforcement and reality television to allow officers to focus on properly policing the communities they serve. Barriers would not prevent the recording of law enforcement or the ability to properly hold them accountable. They would simply prevent a spectacle from being made of policing and the criminal justice system by those looking to only make a profit. The United States’s political climate may not allow for such a drastic change. At the very least, there is a need for more transparency by television shows of a police department’s ordinary course of action and education of police officers to ensure they safeguard the public’s constitutional rights.

56. See *COPS’ Awards and Nominations*, EMMYS, <https://www.emmys.com/shows/cops> [<https://perma.cc/NJC5-A53S>].

57. *Wilson*, 526 U.S. at 613.