

EXHIBIT 31

IV 2383392

WITNESS INTERVIEW

██████████ ██████████

██████████ Today's date is July 21st, 2016, and the time is approximately 1452 hours and this is a witness interview with ██████████ ██████████ regarding case number IV2383392. This is a telephone interview and my name is Sergeant ██████████ ██████████ I'm assigned to the Los Angeles County Sheriff's Department Internal Affairs Bureau and my last name is spelled ██████████. And Ms. ██████████ if you could please introduce yourself, first and last, and then spell your last name for me.

██████████ My name is ██████████ ██████████ my last name is ██████████.

██████████ All right, and I am conducting an administrative investigation related to Deputy Sheriff ██████████ ██████████ Do you know ██████████ ██████████

██████████ Yes.

██████████ And how do you know her?

██████████ She's been a very close friend of mine for over 10 years, I used to live next door to her.

██████████ And did the two of you attend high school together or school of some sort?

██████████ High school, yes.

██████████ And what I need to speak to you about is a, an incident between her and a boyfriend, are, are you familiar with a boyfriend of, of ██████████ that is named, his name is Caren Mandoyan?

██████████ Yeah, she used to call him Carl but yeah.

██████████ Carl? Okay.

██████████ Yeah, it's probably 'cause... a lot of people called him Carl.

██████████ All right, and how many times have you been around him?

██████████ A handful, maybe, you know, three or four times.

██████████ And I wanted to ask you specifically about a particular incident, and this would've been an incident where maybe you and ██████████ were at a restaurant and then Mr. Mandoyan showed up at some point, and I was wondering if you, if that sounds familiar to you and if you could tell me about that.

██████████ I believe you are referring to, gosh, spring of the year before last, before they split up.

██████████ This, this would've roughly been in, around September of 2014.

██████████ Okay, yeah, that would be about right, it was like late, summer, early fall, I had gone out to visit her in El Segundo, near where she was living at the time, and we were supposed to have a girl's day, and he had, he had been talking to her and, and come by when I first got there at her house, and then we were going out, he was supposed to be meeting friends, and later on he showed up at the restaurant where we were.

██████████ And what, what happened while you were at the restaurant? Was it just the three of you?

██████████ Yeah, it was just the three of us.

██████████ And if you could just kind of tell me, you know, a little bit about what was going, what, what restaurant was it, first off?

██████████ It was Rock & Brew, it's like a kind of brewery/restaurant place near the beach down there.

██████████ And approximately how long were you there?

██████████ Well we had been there for, I don't know, maybe a half an hour before he showed up. And he knew where we were gonna be before he came there, so it was kind of a surprise when he showed up there, like, he had called her when he was already heading over and, and she told me, oh, I guess he's gonna come by, but I don't think he's gonna stay too long.

██████████ Okay.

██████████ Yeah, 'cause it was supposed to be, you know, kind of our time, he wasn't supposed to be there or anything.

██████████ And what time of the day would this have been?

██████████ This was early evening, maybe like five o'clock.

██████████ And were the three of you drinking alcohol that night?

██████████ Well, yeah, we each had a beer or two, well, I had one, I think ██████████ had one or two, and, and, and Caren had, had two or three, I think. I don't know, we were all, we, we were sitting there for a couple hours by the time we left.

██████████ And did anything unique or anything happen while you were at the Rock & Brew between ██████████ and Carl?

██████████ There was some tension, you know, we were all kind of hanging out and he was, he was talking to us, but you know, there was kind of some notable tension there because, you know, she kind of asked him a couple times, well, I thought you were going to meet your friends, why did you blow off your friends, you know. You know, we can see each other later-kind of thing, and, and he was like, well, I didn't feel like going and, and he just, you know, kept staying and kept staying, and at one point they got up from the table and, and went out, out to the, like, parking lot area to have a cigarette and talk privately away from me. I'm not sure exactly what happened then, but they came back and she seemed even more agitated about the situation at the time.

██████████ And did, after they had that talk, how much longer do you think the three of you stayed at the, the Rock & Brew?

██████████ Not too much longer, maybe 20, 30 minutes, we, you know, finished our drinks and got the check and walked back to ██████████ ██████████ apartment.

██████████ Did you, did the, did all three of you walk back to her apartment?

██████████ Yes.

██████████ And what happened when you got back to the apartment?

██████████ You know, the whole walk back was kind of, I don't know, he was, he seemed a little bit intoxicated. I didn't think he'd had too much to drink, but he seemed a little bit like he had, you know, had a little bit too much and was kind of being annoying and we got back to the apartment and, and, and they were, you know, on edge and kind of bickering a bit. We got back up there and I was supposed to have hung out for a while, but you know, it was obvious that there was just more going on with, with them at the time and it was, you know, kind of an uncomfortable situation for me, so after they were kind of arguing back and forth and they went, they went in her bedroom for a few minutes and were arguing and she came back out and I, I told her that, you know, I wasn't, you know, that I was just gonna head home. I was getting tired and, and she, you know,

she's like, are you sure, you know, you can stay if you want, I can get him to leave and like, no, you guys obviously need to talk and something's going on so, you know, just call me and let me know everything's okay and, and she, you know, we're good friends so we always check in with each other especially after a long drive, let her know, you know, that I get home safe and stuff like that. So it just, I don't know, just it seemed like there was, he was mad about something and, and she was irritated that he had kind of stepped in on our time and, and, you know, it seemed like it was gonna be kind of a typical, you know, couple fights.

██████████ And how long would you say that you were at the apartment before you left?

██████████ Not too long, maybe, maybe 20 minutes or so. I was kind of waiting for her to come back out so I could say goodbye and make my exit, but she walked me down to my car and he stood up at the top of her stairs right outside her front door and watched us walk to her car. So he could like see what we were doing and listen to what we were saying, and, and was kind of, you know, hollering at her from up there.

██████████ Do, do you remember what he was saying?

██████████ I, honestly, don't remember, it's been quite a while. I, I think it was just kind of a matter of, you know, something to gist of like he was concerned with, that we were down there talking shit about him and it's like, we're just saying goodbye, like, she'll be up in a minute-kind of thing, and, you know, he just, he wasn't liking it too much.

██████████ Was there ever any conversation about him trying to look at ██████████ cell phone?

██████████ That was something that she had told me previously, that she had had instances where he had, you know, gone through her phone or, you know, wanted to see her emails and, you know, was suspicious of her, you know, talking to her other people, that he had kind of a jealous attitude.

██████████ Did, did she ever tell you anything about her, about him telling her not to lock, like talk to friends or coworkers or cousins or other family members, anything to that effect?

██████████ There was a couple times when she had kind of told me about when they were fighting that, you know, he was, he would make a point of telling her not to say things to people they worked with 'cause he was, you know, he didn't want her, you know, he didn't want her talking crap about him or saying things about him to anyone behind his back 'cause, you know, he

didn't want her to make him look bad, you know, because they know a lot of the same people are in the Department.

Are you aware of any, any incident that occurred between them after you left that night?

I know what she told me after the fact.

What did she tell you?

Well, I, I tried to call her to let her know that I got home safe, that's normally what we do, and I couldn't get ahold of her, and finally I got a text and it was something to the effect of, you know, I'm sorry if, if he made, you know, if Caren made you uncomfortable. You know, I, I hope he didn't ruin, you know, I'm sorry he ruined our girl time and I said, oh, you know, it's no problem. I mean, you know, obviously, you guys needed to talk and it's fine. Well I got a call from her later on that night telling me that that wasn't her, that he had taken off with her cell phone and she asked me what I texted because he tried to say to her that, that I complained to her and that, that I said something negative about him, and, and the situation, and, and he, and I told her, I said, no, I didn't, I said, I said, no, it's fine, you guys just obviously needed to talk it seemed a little tense, and, you know, apparently after I left, they had gotten into a bigger fight and it, you know, it reached a point where she had, you know, it had gotten semi-physical and she had kicked him out and he took her cell phone in the process and left with it in his car so he could go through it, and that was when I texted him, or texted her, not knowing he had it.

And so just as, as, as you understood it that night, when you texted what you thought was [REDACTED] it was actually...

It was actually Caren.

And then what did [REDACTED] tell you specifically about, you had mentioned some physical activity between the two of them, what, what was that activity that she told you about?

That, that they, they got in a bigger fight and were shouting at each other and, and she shut the bedroom door and locked him out and he tried to make his way through the bedroom door, and kicked, you know, a partial hole in the bedroom door, you know, that was after, you know, they had kind of tussled and she, he had torn her jeans, and, you know, she was telling him to get, you know, get into the bedroom and lock him out, I think that was at the, that was the point when he took her cell phone and stuff and, and left. I don't exactly remember how it reached that point, I just remember there was a lot of accusations going around that, you know, he

was accusing her of like not wanting him there because we were supposed to be meeting somebody and, and that, you know, that, you know, she was cheating or talking to somebody else or, and he wanted to know what she was telling me about him and, and, you know, there was just a, a lot of demands that he was making on her at the time that, you know, she was refusing to, you know, accusations that she was refusing to answer to him, 'cause she thought he was being ridiculous and she told him, so....

██████████ Did, did she mention anything about him attempting to either choke her or punch her or anything like that?

██████████ I, I think that happened after he came back, 'cause she tried to chase him down when he took off with her phone and walked, so she went back to the apartment and later on he came back and, and I think that that was the point when, when that happened, because she did tell me, and she, she had actually, I saw her not too long after that and I had seen she had a little bit of a bruise. You know, she, she told me that, you know, he had just kind of gone, like, just super mad and just throwing accusations at her and, and then, but then wanted to try to, I don't know, kiss her or make up with her or what, but she was, she was fighting him off and, and that's when he put his hands on her and put his hand around her neck and was, you know, I mean, obviously, he's, he overpowered her and, and, you know, it's, she ended up breaking free and I'm not sure exactly how, but got him out of the apartment and locked him out but, you know, that wasn't the only time where he had, had pushed her boundaries against her wishes, as far as like access to her home, so after that, she was just kind of afraid about trying to keep him out of there, and keeping her doors and windows locked, things like that 'cause she called me all upset that, you know, that, you know, he, they had gotten to, really gotten into it this time and, and that he had put his hands on her and, and she had to kick him out and, and, you know, told him that she didn't want to see him and, and, you know, I told her that she needed to do something about it. I told her that, you know, that that wasn't right, that she should call the police and file a report. And she didn't want to do that immediately at that time because she was worried about both of their positions, you know, being in law enforcement.

██████████ Did, you had mentioned that after you left, that you had texted what you thought was ██████████ Obviously, to ██████████ phone, correct?

██████████ Yeah, I texted ██████████ phone...

██████████ And then...

██████████ I didn't know, I thought she had it.

██████████ And then you had mentioned that later that night you actually spoke to her, correct?

██████████ Yes.

██████████ How, how much later do you think that was?

██████████ Well, I spoke to her, well, I spoke to her and found out that she, that he had had her phone and I think not too much later after that, like, maybe, like, a couple hours after I had texted her.

██████████ And, go ahead.

██████████ She, she had an old cell phone that was still working she didn't use much, I think she had ended up calling me from that phone. And, and kind of asked me if, if I had gotten a call from her phone or, or if, you know, if I had texted her and I told her, yes, I texted you that I got home, this and that, and that's how I found out that she didn't have her regular phone at that time.

██████████ And then you had mentioned that you saw her a couple days after this incident?

██████████ Yeah, it was, it was a couple days, a few days, 'cause we were supposed to be meeting up again and, and I saw her for an afternoon.

██████████ And then you said something about bruising, what, what did you see?

██████████ She had a little bit of purplish bruising on the side of her neck.

██████████ And did you see anything else?

██████████ She showed me the hole in her bedroom door.

██████████ What, what, had that hole been there when you were there earlier?

██████████ Not that I had ever seen.

██████████ And how, what did she tell you about the bruising that you saw, how she received it or did she give you any details about that?

██████████ Yeah, she, I mean, she told me that, that that night, after I had left, that they had gotten in a fight and when he had taken off with her, her phone, and, and, you know, that he had, that Caren had done it, that he had put his hands on her and she kind of got in a struggle with him and at, that's,

you know, when she locked herself in the bedroom is when he kicked, you know, tried to kick in through the door and made a, you know, a hole in one side of the door.

██████████ Did, did, did ██████████ ever send you any photographs or videos or any audio recordings, anything like that, about things that she was documenting related to what was going on between the two of them?

██████████ She didn't send them to me, but she told me about them.

██████████ That, that she was making them or, I mean, what did she tell you?

██████████ She, she told me, 'cause when I told her that she needed to do something about protecting herself from him, if that's the kind of person he was gonna be, she said she took pictures and, you know, told him that if, you know, if he ever came around again that, you know, she would use the pictures, you know, and file a report.

██████████ Did, did she ever show you the pictures or she just told you about them?

██████████ She told me about the pictures.

██████████ And did she ever tell you about anything about videos that she made or anything like that?

██████████ She told me about a video she made of another incident when he tried to break in to her apartment through the bathroom window, and there was, he was, you know, screaming at her and trying to get in and, 'cause he knew the bathroom window didn't latch, and was trying to climb in through it and knocking things down, and throwing shampoo bottles, at her as she was yelling at him to, you know, to get the hell out and she videoed it, because he wouldn't go away, and told him that she was gonna call the cops. Meanwhile, I think that's, at that time, a neighbor or somebody had, had called the, the cops or, called her about calling the cops because they heard the commotion.

██████████ Did, did, did you ever witness, were you ever present and witnessed any physical things between the two of them?

██████████ I never, personally, witnessed any, like, physical assault or altercation between the two of them.

██████████ Did, let's see. Is there anything maybe I haven't asked you that, that you're aware of, that is in relation to, obviously, the things that we've been talking about, things that I would be looking into?

[REDACTED] I can tell you that, I mean, I did witness that he had a very jealous personality when it came to her, that, you know, he had, I mean, I didn't spend a lot of time around the two of them directly, it was, it was most, most of what I know is coming from my friend, who, you know, I became concerned about what she was telling me, but I know that even after the physical incident, that you have been asking about that he showed, he kept showing up at her apartment, that he, you know, made threats about how if she did anything, that he'd ruin her career and he'd make sure everyone in the Department knew that, knew that she was a slut and, you know, that he knew people up high and that he would, and he would make sure that her career wouldn't go any, anywhere, and he'd ruin her, and, you know, he kept showing up at her apartment for months.

[REDACTED] After they broke up?

[REDACTED] (Talking over). Yeah, after they broke up.

[REDACTED] And, all right, is, is there anything else that you think would be of interest that you can recall about this?

[REDACTED] I mean, I know I can't speak directly to specific incidents but I can tell you I know my friend this isn't something that she would, that she took lightly in filing a report, first of all, and second of all, that, you know, it's not something that she would exaggerate or make up. And I know the kind of person she is, she is, you know, she's a strong person, she prefers to handle things on her own, so the fact that she felt threatened, fear enough to finally do something about it and take legal action, I take very seriously and I would, you know, I became very worried for her safety and the fact that she felt like she wasn't safe in her own home.

[REDACTED] And you had mentioned earlier, a couple times, that you had told her that she needed to report this stuff, you know, you know, closer to the time of when things had happened, and what was her response to her, to you when you would tell her that?

[REDACTED] That she was terrified of making things worse if she did file something. She was afraid that he would escalate things if she did file, because threatening his job he would've taken so seriously, that she really thought that, you know, if she could handle things on her own and that he would, you know, eventually give up and go away, but when, and, and she didn't want to smear either one of their needs if she could avoid it, you know? If, it's a, it's kind of a small world within, within a Department, and people talk, and she didn't want to, you know, become them to talk about them so just between that and just being afraid that, you know, he, he got wind she was filing something, that it would make the situation worse, not better, because she was afraid that, you know, as a police officer, and someone

who, who carries a gun and, and things like that, that, you know, he could get any, that he could get around the regular type of protections, and, you know, she just didn't think it would help she thought it would make things worse, so for a long time, she just tried to deal with it in hopes that he would go away and that the threat of her having evidence was gonna be enough to keep him away and get back on, you know, the right path and staying away from her.

██████████ All right, is there anything else as, as we conclude?

██████████ Not that I can think of.

██████████ I show the time as, let me take a look at the clock here, 1519 hours, and that's gonna conclude the interview.

██████████ Okay.

End of interview.