

# EXHIBIT 37

BEFORE THE CIVIL SERVICE COMMISSION  
OF THE COUNTY OF LOS ANGELES  
JOSEPH SCULLY, HEARING OFFICER

IN THE MATTER OF THE DISCHARGE, )  
EFFECTIVE SEPTEMBER 14, 2016, OF: )  
CAREN MANDOYAN, ) CASE NO. 16-276  
APPELLANT, )  
FROM THE POSITION OF DEPUTY )  
SHERIFF, LOS ANGELES COUNTY )  
SHERIFF'S DEPARTMENT OF, )  
RESPONDENT. )

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TRANSCRIPT OF PROCEEDINGS  
Los Angeles, California  
Monday, July 24, 2017

Reported by:  
EILEEN ELDRIDGE  
HEARING REPORTER

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APPELLANT, )  
FROM THE POSITION OF DEPUTY )  
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SHERIFF'S DEPARTMENT, )  
RESPONDENT. )

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Transcript of Proceedings, taken at  
500 West Temple Street, Los Angeles, California,  
Room 522-B, beginning at 9:00 a.m. and ending  
at 4:30 p.m., on Monday, July 24, 2017,  
heard before Joseph Scully, Hearing Officer,  
reported by Eileen Eldridge, Hearing Reporter.

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APPEARANCES:

For the Respondent:

SHERIFF'S DEPARTMENT  
BY: CHRISTINE ROAM  
4900 South Eastern Avenue  
Suite 101  
Commerce, California 90040

[REDACTED]

For the Appellant:

ATTORNEY & COUNSELOR AT LAW  
BY: MICHAEL A. GOLDFEDER  
MICHAEL A. GOLDFEDER  
6th Floor  
El Segundo, California 90245

[REDACTED]

Also present: PETER M. BOLLINGER

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I N D E X

OPENING STATEMENT

	<u>PAGE</u>	<u>LINE</u>
MS. ROAM	41	20
MR. GOLDFEDER	50	8

DEPARTMENT'S WITNESSES:

	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
[REDACTED]	69 177	192	242	245
[REDACTED]	120	141	162	
[REDACTED]	168	170		

APPELLANT'S WITNESSES:

<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
- NONE OFFERED -			

E X H I B I T S

DEPARTMENT'S EXHIBITS:

MARKED FOR IDENTIFICATION

RECEIVED IN EVIDENCE

- 1 - Disposition Worksheet  
dated August 12, 2016  
(7 pages)
- 2 - Letter of Intent  
Dated August 15, 2016  
(16 pages)
- 3 - Letter of Imposition  
Dated September 15,  
2016 (5 pages)

E X H I B I T S (Continued)

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DEPARTMENT'S EXHIBITS:

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- 4 - Investigation 2383392  
Table of Contents and  
Investigative Summary
- 5 - July 20, 2015  
El Segundo P.D.  
P.D. Interview of  
[REDACTED]
- 6 - El Segundo P.D.  
Report #15-1659  
(23 pages)
- 7 - I.A.B. Interview of  
Deputy [REDACTED]  
June 24  
(90 pages)
- 8 - I.A.B. Interview of  
Deputy [REDACTED],  
June 29  
(20 pages)
- 9 - I.A.B. Interview of  
Deputy [REDACTED]  
[REDACTED] June 30,  
[REDACTED] es)
- 10 - I.A.B. Interview of  
Deputy [REDACTED]  
[REDACTED] e 30,  
[REDACTED] ges)
- 11 - I.A.B. Interview of  
Deputy [REDACTED]  
June 30  
(6 pages)
- 12 - I.A.B. Interview of  
Deputy [REDACTED]  
June 30  
(7 pages)

E X H I B I T S (Continued)

DEPARTMENT'S  
EXHIBITS:

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IN EVIDENCE

- 13 - I.A.B. Interview of  
Deputy Ryan Danowitz,  
July 6, 2016  
(4 pages)
- 14 - I.A.B. Interview of  
[REDACTED] July 13,  
[REDACTED] es)
- 15 - I.A.B. Interview of  
[REDACTED]  
(18 pages)
- 16 - I.A.B. Interview of  
[REDACTED]  
(10 pages)
- 17 - REDACTED Caren Mandoyan  
I.A.B. Interview,  
July 14, 2016,  
(99 pages)
- 18 - Mandoyan I.A.B.  
Interview UNREDACTED,  
Pages 85-99
- 19 - Deputy [REDACTED] Interview  
Exhibit [REDACTED] os  
(11 pages)
- 20 - June 3, 2015 [REDACTED]  
Text (3 pages)
- 21 - Restraining Order  
Documents
- 22 - Mandoyan/[REDACTED]  
Facebook [REDACTED]  
May 22, 2015, (1 page)

E X H I B I T S (Continued)

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DEPARTMENT'S  
EXHIBITS:

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IN EVIDENCE

- 23 - Guidelines for Discipline
- 24 - Penal Code Sections 273.5, 594, 602 and 459
- 25 - Investigation 2383392 Addendum documents
- 26 - UNREDACTED [REDACTED] I.A.B. inte [REDACTED] of July 28, 2016
- 27 - Ms. [REDACTED] e-mails of Vide [REDACTED] Voice Recording
- 28 - Transcript of Mandoyan/[REDACTED] Phone Conversat [REDACTED]
- 29 - D.V.D. of Audio and Audio Recordings
- 30 - C.D. of Audio Recording



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E X H I B I T S (Continued)

<u>APPELLANT'S EXHIBITS:</u>	<u>MARKED FOR IDENTIFICATION</u>	<u>RECEIVED IN EVIDENCE</u>
50 - One-page Phone Records	194	
51 - Property Receipt		
52 - Five-page Document		



1 helps me to keep it straight if I know at that 50 and  
2 above is from the Appellant and below that is the  
3 Department.

4 I don't think you're going to have more than 20  
5 extra beyond the 30; right?

6 MS. ROAM: I don't anticipate that.

7 HEARING OFFICER SCULLY: And I don't mind letters  
8 either, except I've had situations where he have  
9 Exhibit A, AA and AAA and BBB and so on, then it's, like,  
10 you know, wouldn't it just be easier to use a number?


11 MR. GOLDFEDER: That's fine. I'll start with 50  
12 then. Thank you.

13 HEARING OFFICER SCULLY: All right.

14 Sir, raise your right hand.

15

16

17   
18 having previously been duly sworn by the Hearing Officer,  
19 was examined and testified as follows:

20 HEARING OFFICER SCULLY: Thank you. State and  
21 spell your name, please.

22 THE WITNESS: Lieutenant 

23 

24 HEARING OFFICER SCULLY: Thank you. Go ahead.

25 MS. ROAM: Thank you, sir.

///

1 DIRECT EXAMINATION

2 BY MS. ROAM:

3 Q Good morning, Lieutenant [REDACTED]

4 A Good morning.

5 Q You are currently employed by the Sheriff's  
6 Department; is that correct?

7 A That's correct.

8 Q How long have you been so employed?

9 A 27-plus years.

10 Q Okay. And how long have you been a lieutenant?

11 A Three months.

12 Q And so I want to take you back to November  
13 of 2015.

14 What was your rank and assignment at that time?

15 A November of 2015 I was assigned to the L.A.  
16 County Sheriff's Department Internal Affairs Bureau and I  
17 was a sergeant.

18 Q Okay. And as of November of 2015, how long had  
19 you been assigned to Internal Affairs Bureau?

20 A I worked at Internal Affairs Bureau on two  
21 different occasions. The first occasion was for two years  
22 and then on the second occasion, November of 2015, would  
23 have been approximately other year and a half, 14 months.  
24 Something like that.

25 Q Can you tell us what your duties as an I.A.B.

1 investigator were?

2 A To conduct administrative investigations related  
3 to policy violation for the Department.

4 Q Okay. And were you, in fact, assigned to  
5 investigate this case involving Caren Mandoyan?

6 A I was.

7 Q And do you know when you received that  
8 assignment?

9 A It was sometime in November of 2015. I don't  
10 recall a specific date.

11 Q Okay. And once you were assigned the  
12 investigation -- well, let me back up.

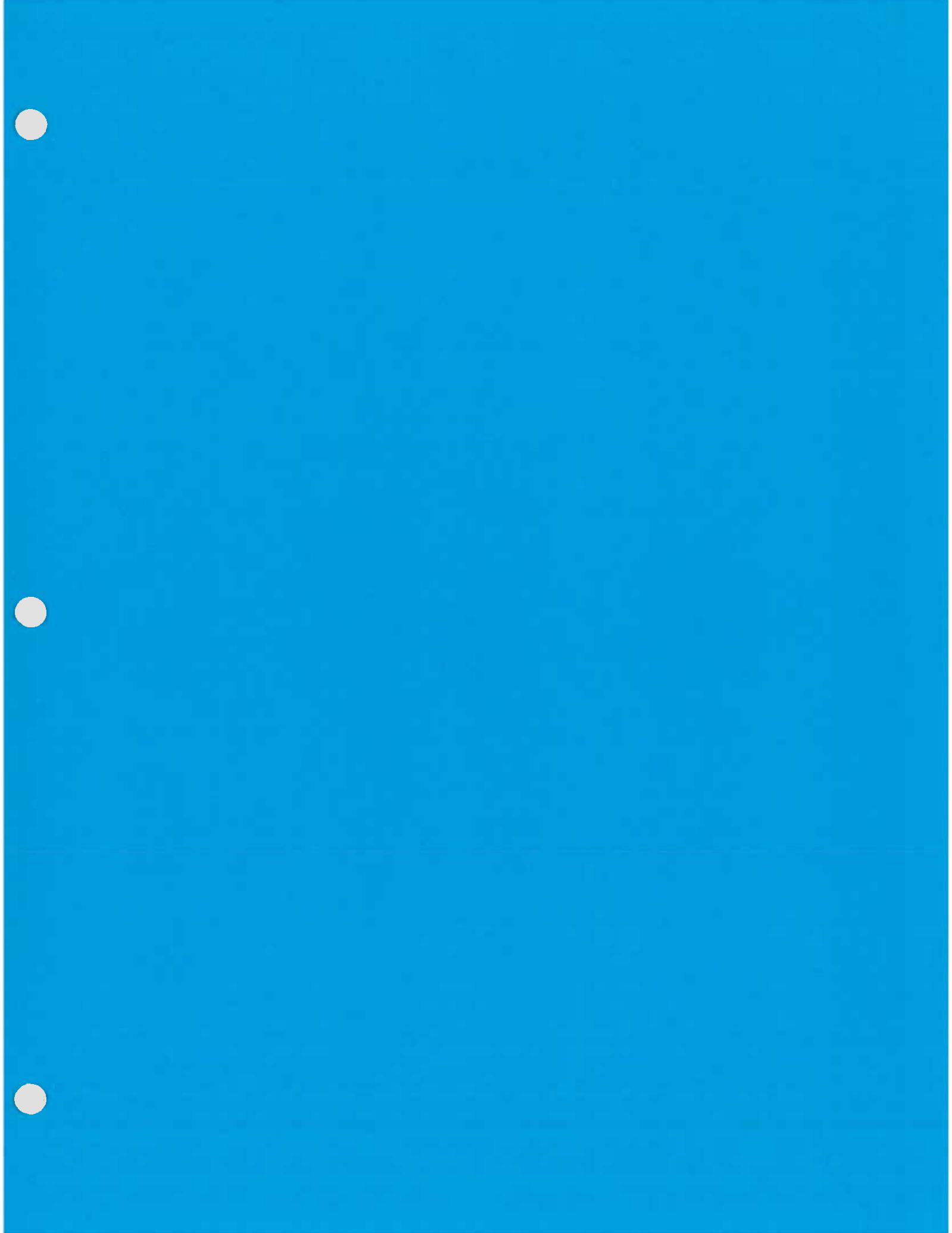
13 At the time you were assigned the investigation,  
14 were you told anything?

15 A No.

16 Q Okay. And so once you received the assignment,  
17 what did you do?

18 A In this case, I was assigned what is considered a  
19 completed criminal monitor. And it has a file of the  
20 pertinent document that were collected during the criminal  
21 monitor phase of the investigation. When I received it,  
22 it was an active administrator investigation.

23 So I reviewed the contents of the completed  
24 criminal monitor and just reviewed it. I attempted to  
25 interview witnesses and then began the investigation.



1 your convenience. All right. So we have  
2 Lieutenant [REDACTED] back, but we're going to take a  
3 witness out of order; right?

4 MS. ROAM: Please.

5 HEARING OFFICER SCULLY: Okay. So who is that  
6 witness?

7 MS. ROAM: The Department's next witness is  
8 [REDACTED]

9 HEARING OFFICER SCULLY: Okay. Is that  
10 Ms. [REDACTED] present? Step up to the chair, please. Raise  
11 your right hand, please.

12  
13 [REDACTED]  
14 called as a witness, and having been first duly sworn by  
15 the Hearing Officer, was examined and testified as  
16 follows:

17 HEARING OFFICER SCULLY: Thank you.

18 THE REPORTER: You're going to have to keep your  
19 voice up.

20 HEARING OFFICER SCULLY: Can I have you state and  
21 spell your name for the court reporter and do remember  
22 that everybody needs to hear you here pretty clearly, so  
23 there's no doubt about what you're saying.

24 THE WITNESS: Okay. My name is [REDACTED]  
25 spelled [REDACTED]

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HEARING OFFICER SCULLY: Thank you.

THE WITNESS: You're welcome.

DIRECT EXAMINATION

BY MS. ROAM:

Q Good afternoon, Ms. [REDACTED] You were interviewed as part of an administrative investigation involving Deputy [REDACTED] and Caren Mandoyan; is that correct?

A Yes.

Q Keep your voice up so that everyone can hear you, okay?

A Okay.

Q Do you recall who interviewed you?

A Yes. Detective [REDACTED]

HEARING OFFICER SCULLY: Who? Who?

THE WITNESS: Detective [REDACTED]

HEARING OFFICER SCULLY: Thank you.

BY MS. ROAM:

Q And how was that interview conducted?

A Over the phone.

Q Okay. During the interview, Ms. [REDACTED] were you truthful?

A Yes.

Q Now, there's a big binder in front of you there, and I'm going to ask you if you would turn to Exhibit 14,



1 the tab on the side.

2 A Okay.

3 Q And go ahead and take a look at that document.

4 Do you recognize it?

5 A Yes, I do.

6 Q And what is this document?

7 A It appears to be the typed up document of my  
8 phone interview with Detective [REDACTED]

9 Q Okay. Have you had occasion to see it prior to  
10 today?

11 A Yes, I have.

12 Q And did it appear to be accurate?

13 A Yes.

14 Q Okay. Now, Ms. [REDACTED] I want to ask you, how do  
15 you know [REDACTED]

16 A She's my cousin.

17 Q How would you describe your relationship with  
18 [REDACTED]

19 A Very close.

20 Q And do you know the Appellant in this case,  
21 Caren Mandoyan?

22 A Not to a great extent; but, yes, I do. I met him  
23 on a couple of occasions.

24 Q Okay. And can you tell me how -- do you know  
25 what the Appellant and [REDACTED] relationship was?

1           A    Boyfriend and girlfriend.

2           Q    Okay.  When did you first meet the Appellant?

3           A    I would not know a specific date.  It was over at  
4 her El Segundo apartment, and I wouldn't be able to recall  
5 an exact date.

6           Q    Okay.  Do you recall her moving into the  
7 apartment?

8           A    I did have a telephone conversation with her with  
9 when she was moving into the apartment, but I wasn't there  
10 with her when she moved in.

11          Q    Okay.  In relation to when she moved in, do  
12 you -- does that help give you reference as to when you  
13 might have first met the Appellant?

14          A    I met him after she moved in.

15          Q    Okay.  Tell me how you met the Appellant?

16          A    We were hanging out.  I would go and spend the  
17 weekend at my cousin's just to catch up.  We grew up  
18 together.  And he came over.

19          Q    Okay.  And how many times would you estimate this  
20 happened where you went to hang with [REDACTED] and the  
21 Appellant would show up?

22          A    Nine times out of ten.

23          Q    Okay.  I'm asking about how many times did you go  
24 over that you recall.

25          A    Instances where he showed up, or just me going

1 over?

2 Q Just you going over.

3 A I would say seven, eight times.

4 Q And when you would go over you indicated that the  
5 Appellant would show up; is that correct?

6 A That's correct.

7 Q Okay. Was this planned where he would get  
8 together with you?

9 A No. Not to my knowledge.

10 Q Okay. So tell me the circumstances around him  
11 coming to the apartment.

12 A Circumstances being I was there to spend time  
13 with my cousin, her phone would constantly go off getting  
14 text messages, phone calls and Mr. Mandoyan, he would,  
15 eventually, show up. As far as their discussion as to why  
16 he wanted to come over and felt the need to be there, I  
17 don't know.

18 Q Okay. Did [REDACTED] ever tell as to whether she  
19 invited him?

20 A It was made very clear that he was not invited.

21 Q And when you say it was made clear, did she make  
22 it clear to him when he showed up?

23 A With words, no.

24 Q Okay. Describe it for me, please.

25 A It was more of her mannerisms, irritated. She

1 would look at me mouth the words "I'm sorry," because it  
2 was every single time I would go over there he would have  
3 to be there.

4 Q Okay. And did you have occasion to observe the  
5 two of them interact?

6 A Yes.

7 Q How would you characterize their relationship?

8 A Unhealthy at best.

9 Q Okay. And describe it for me. Why did you  
10 conclude it was unhealthy?

11 A There would be instances where I would be there  
12 with her in her apartment or a restaurant, we would go out  
13 to eat, anywhere, he would make comments soft enough in  
14 her ear so that I could not hear them. And my cousin,  
15 from the reaction on her face, they were not positive  
16 comments. He made her extremely uncomfortable.

17 Q Do you recall, Ms. [REDACTED] moving into that  
18 apartment in around 2014?

19 MR. GOLDFEDER: Objection. [REDACTED] moved into the  
20 apartment?

21 MS. ROAM: I'm sorry. Thank you.

22 BY MS. ROAM:

23 Q Let me re-ask that question.

24 Do you recall [REDACTED] moving into her El Segundo  
25 apartment around April of 2014?

1           A    That sounds about right. I couldn't be sure, but  
2   that sounds about right.

3           Q    Okay. And so you mentioned that there were times  
4   you were there to spend time with her and he would show  
5   up?

6           A    Yes.

7           Q    Did you observe anything peculiar during those  
8   incidents?

9           A    Aside from him making those quiet comments in her  
10   ears, and there was one occasion we were sitting on the  
11   couch watching T.V., it was later at night. "We" being me  
12   and my cousin, were on the couch.

13                    She was all the way to the left to where the arm  
14   of the couch was and Mr. Mandoyan was still there, and me  
15   and [REDACTED] kept looking at each other. When is he going to  
16   leave? This is, obviously, our time to spend together.  
17   And he crouched down on the side of the couch and sat  
18   there and watch T.V. with us for 15, 20 minutes before he  
19   finally left.

20           Q    Do you know how long the Appellant and your  
21   cousin dated?

22           A    I don't know exactly. I would have to make a  
23   guesstimate.

24           Q    Can you give us your best estimate based on what  
25   you knew?

1 HEARING OFFICER SCULLY: Well, I think she said  
2 she would have to make a guesstimate. So I take that  
3 means -- her answer was, "I don't know. I would have to  
4 guess."

5 I mean, is there a foundation for even asking her  
6 what her estimate is?

7 MS. ROAM: No, sir.

8 HEARING OFFICER SCULLY: Okay.

9 MS. ROAM: I'll withdraw.

10 HEARING OFFICER SCULLY: I don't think she knows.

11 MS. ROAM: Okay.

12 BY MS. ROAM:

13 Q Now, were you aware that [REDACTED] had a surveillance  
14 camera in her apartment?

15 A Yes.

16 Q What did you know about that?

17 A What I knew about the surveillance camera was  
18 that she had come home one day. She vacuums her carpet in  
19 a particular way to a striped pattern. That's just how  
20 she is.

21 She noticed footprints coming from one of the  
22 windows onto the carpet that she had just vacuumed. So  
23 that is what prompted her to put the camera up. She was  
24 concerned, so she had put the surveillance camera up.

25 Q Okay. And did you ever become aware whether or

1 not the Appellant had access to that surveillance feed?

2 A No.

3 HEARING OFFICER SCULLY: So, I'm sorry. I'm  
4 going to clarify your answer. You didn't become aware of  
5 that fact one way or another?

6 THE WITNESS: Well, it's hard to say. He claims  
7 he didn't know. I don't know if factually if he did or  
8 not. So I don't know how to answer that. If he  
9 actually --

10 HEARING OFFICER SCULLY: I wasn't sure if she was  
11 saying, no, he didn't have access. Or, no, she never  
12 became aware if he did or not.

13 MS. ROAM: Thank you.

14 HEARING OFFICER SCULLY: Could you just clarify  
15 that, what she's saying?

16 MS. ROAM: Okay.

17 HEARING OFFICER SCULLY: Is this the same  
18 surveillance camera we heard testimony about earlier?

19 MS. ROAM: That's correct.

20 BY MS. ROAM:

21 Q And let me just ask you, Ms. [REDACTED] where was  
22 this camera located?

23 A It was on the very right-upper corner to the  
24 T.V., all the to the right corner.

25 HEARING OFFICER SCULLY: So just -- you don't

1 know if Mr. Mandoyan knew about the camera, do you know  
2 that.

3 THE WITNESS: He knew about it, yes.

4 HEARING OFFICER SCULLY: Did he have anything to  
5 do with installing it?

6 A That I don't know.

7 BY MS. ROAM:

8 Q Were you ever over at [REDACTED] house where  
9 something about the camera came up?

10 A Yes.

11 Q Tell us about that?

12 A [REDACTED] and myself were sitting on the couch  
13 watching T.V., having a conversation, her cell phone went  
14 off, it was Mr. Mandoyan. I couldn't make out what he was  
15 hearing, but it was at a volume that I could definitely  
16 hear it wasn't a normal tone coming over the phone, so I  
17 took it that he was yelling. She got off the phone and  
18 told me he had heard what we were talking about because he  
19 was listening in through the camera, and that he's  
20 watching us.

21 Q How did that affect [REDACTED]

22 A We were both very disturbed and shaken up by  
23 that. It was a very uncomfortable feeling.

24 Q Do you recall when that was?

25 A I don't. I don't remember.



1 BY MS. ROAM:

2 Q Ms. [REDACTED] did [REDACTED] ever tell you that tell  
3 Appellant told her not to talk to you?

4 A Yes.

5 Q And can you tell us what -- can you tell us about  
6 that?

7 A She had mentioned it briefly and then stated that  
8 he was uncomfortable with her talking to me. "What are  
9 you guys talking about? I don't understand why you need  
10 to talk so much, why are you going out drinking? Why are  
11 you doing this; why are you doing that."

12 He just didn't want to have me spending time with  
13 my cousin.

14 Q Did [REDACTED] ever tell you if he examined her  
15 telephone?

16 A Yes.

17 Q What did she tell you?

18 A That he would go through her phone, looking  
19 through her call logs, see who she was speaking to, would  
20 delete things, if he didn't like it, out of the phone on a  
21 constant basis.

22 Q I'm sorry, you said?

23 A On a constant basis.

24 Q Now, Ms. [REDACTED] did you ever go on a ride-along  
25 with [REDACTED] when she was working at West Hollywood Station?

1 Q Tell us what you saw?

2 A As far as, physically, meeting up that night, we  
3 met up to eat. And they had their conversation, ate and  
4 that was pretty much the extent of it.

5 Q Okay. Did the Appellant show up any other time  
6 during the shift?

7 A Not physically, no.

8 Q Okay. Tell me what you mean by "not physically"?

9 A Her phone was going off constantly, again, with  
10 the texting and the phone calls asking her where she was  
11 at. Are you taking a call? What call are you on? Did  
12 you go to the briefing? Any and all questions the entire  
13 time.

14 Q Now, did you ever -- did [REDACTED] ever tell you  
15 about an incident where the Appellant physically assaulted  
16 her?

17 A Very vaguely.

18 Q Okay. What did she tell you?

19 A That he had assaulted her; that her clothes were  
20 torn in the process, and that she was hurt. She did not  
21 go into detail with me as far as her injuries.

22 Q And in relationship to when this happened, do you  
23 know when she told you?

24 A I don't. I don't remember.

25 Q Okay. Do you know if [REDACTED] ever tried to break

1 up the Appellant?

2 A To any knowledge, yes. She told me she tried  
3 several times.

4 Q Do you know over what period of time she  
5 attempted to break up with him?

6 A No. I don't remember specifically.

7 Q Okay. And did she tell you why it took so long  
8 to break up with him?

9 A She wanted to try and make a peaceful exit out of  
10 the relationship and not have it become, as she would put  
11 it, opening up Pandora's box to make a complaint. She  
12 didn't want to have to deal with anything that would come  
13 after that.

14 So she was trying to just slowly back away from  
15 the relationship and that wasn't working, so she tried to  
16 politely tell him, "Stop calling me. Stop coming over."  
17 And that did not work.

18 Q Okay. Did -- during the time that she attempted  
19 to break up with him, did they ever get back together?

20 A I believe so.

21 Q Do you know why?

22 A I don't. I have no clue.

23 Q Now, did [REDACTED] ever send you any recordings of  
24 any incidents between her and the Appellant?

25 A Yes.

1 Q Why?

2 A She felt unsafe. Her job was being threatened.  
3 He was making threats to her. She was in fear of her  
4 safety.

5 Q Do you recall when [REDACTED] sent you recordings?

6 A I believe it was in November and  
7 December of 2014, '15. I don't recall.

8 Q Okay. Did you review the items that she sent  
9 you?

10 A I did.

11 Q How did she send them to you?

12 A Directly from her phone.

13 Q And do you recall what she sent you?

14 A She sent me one long audio recording and two  
15 video recordings of him attempting to enter her house in  
16 broad daylight, and one that I believe was at nighttime  
17 and I hear her stating that he was crawling into the front  
18 window.

19 Q Okay. In that binder in front of you, I'm going  
20 to ask you turn to Department's Exhibit 27, please.

21 A Okay.

22 Q And, Ms. [REDACTED] when I spoke to you on the  
23 phone, did I ask you to forward any e-mails that [REDACTED] had  
24 sent you?

25 A Yes.

1 HEARING OFFICER SCULLY: If it's relevant, we can  
2 go forward with it. Okay. If you want to withdraw it.  
3 BY MS. ROAM:  
4 Q Ms. [REDACTED] did you have concerns about what was  
5 going on -- what you observed to be happening between  
6 Appellant and Ms. [REDACTED]  
7 A Yes.  
8 Q And what were your concerns?  
9 A Her safety.  
10 Q And why did you have concerns for her safety?  
11 A Because if she felt the need to put a security  
12 camera up in her home where she has never felt the need to  
13 do that before.  
14 Q Okay. Was there anything else that you made you  
15 concerned for her safety?  
16 A Hearing the recordings.  
17 Q Did [REDACTED] ever tell you whether she was in fear  
18 for her safety from Mandoyan?  
19 A Yes.  
20 Q What did she tell you?  
21 A That she was in fear for her safety.  
22 Q Did you make any observations -- did you see  
23 anything that made you believe that [REDACTED] was in fear for  
24 her safety?  
25 A Besides putting up her camera, changing her

1 e-mail, changing her phone number, in moving several  
2 times, anything she could.

3 Q Okay.

4 MS. ROAM: I have no further questions on direct.

5 HEARING OFFICER SCULLY: Just give me a second, I  
6 want to --

7 MR. GOLDFEDER: Sure. No problem.

8 HEARING OFFICER SCULLY: Okay. Go ahead, please.

9 MR. GOLDFEDER: Thank you.

10

11

CROSS-EXAMINATION.

12

BY MR. GOLDFEDER:

13

Q Good afternoon, Ms. [REDACTED]

14

A Good afternoon.

15

Q You interviewed on July 13, 2016, with

16

Lieutenant [REDACTED]

17

Do you remember that interview?

18

A Yes, I do.

19

Q Okay. After that interview, when was the next

20

contact you had with anybody from the Sheriff's Department

21

about this matter?

22

A I believe that would be in December.

23

Q And when was that?

24

A I would have to look at my phone.

25

Q Give me an approximate. Within the last week,

1 system?

2 A No. I don't have knowledge of it.

3 Q Okay. Did she ever tell you what the brand name  
4 of it was?

5 A No.

6 Q Did she ever show you how it worked?

7 A No.

8 Q What did she say she was in fear of as far as her  
9 safety on the job?

10 A She was in fear that he would somehow have  
11 connections, which he claimed to have, to affect her job,  
12 sent her out on extra calls, threatened her job.

13 Q To your knowledge did any of this happen based  
14 upon your conversation with [REDACTED]

15 A To my knowledge, no.

16 Q Okay. So she told you things that, at some  
17 juncture, you found out never happened or never took  
18 place?

19 A I don't know if those things took place or not.

20 Q Well, did she ever tell you she had extra work or  
21 things to do during her shift because of Caren Mandoyan?

22 A No. We never had a follow-up conversation on  
23 that.

24 Q Were you curious about whether or not any of this  
25 stuff happened?

1 A I was. But at the time it was better for me to  
2 know -- I didn't want to know at the time.

3 Q So you had no way of knowing if any of things  
4 that [REDACTED] told you about these threats at work were  
5 actually true?

6 A No.

7 Q Okay. So other than any statements made do by  
8 [REDACTED] that's the sole source of your knowledge  
9 about any work-related threats or difficulties?

10 A That and the voice recording.

11 Q Okay. And the voice recording, that was sent to  
12 you by [REDACTED] do you remember approximately when?

13 A No. I don't remember.

14 Q Did you ask [REDACTED] her purpose in  
15 calling -- strike that.

16 Did she say she called Deputy Mandoyan?

17 A I do not know who initiated the phone call.

18 Q Okay. Was that phone call recording, the  
19 totality of the call, or recording or at some juncture  
20 into the call?

21 A That I don't know.

22 Q Okay. So he is frequently over at her apartment;  
23 correct?

24 A Correct.

25 Q And did [REDACTED] ever tell you that she



1 invited him to come over to her apartment?

2 A Yes.

3 Q Okay. Tell me where she moved after -- what  
4 moves did she make that you testified to here that you  
5 told us today?

6 A Physical address moves.

7 Q Do you know if she got evicted from her apartment  
8 in El Segundo?

9 A I'm sorry? I didn't hear that.

10 Q Do you know if she was evicted from her apartment  
11 in El Segundo?

12 A I do not know that.

13 Q Okay. So you don't have any understanding as to  
14 the reason why she left that premises?

15 A She left because she wanted to ensure her safety  
16 and she didn't want him repeatedly coming over.

17 Q When you say "she didn't want him repeatedly  
18 coming over," but you don't know how many days a week he  
19 was actually staying at that location, do you?

20 A No.

21 Q And you don't know if [REDACTED] was not paying  
22 her rent at that location and asked to leave either, do  
23 you?

24 A No. I don't know that.

25 Q Okay. So you don't have any idea for reason for

1 her leaving that particular location as far as any recent  
2 difficulties or problems at some time?

3 A No. I was told it was for safety reasons.

4 Q And that was told to you by [REDACTED]

5 A Correct.

6 Q Did you ever report any of these concerns that  
7 [REDACTED] was relating to you to any law enforcement  
8 agency?

9 A No.

10 Q Okay. And so the two of you are very close?

11 A Yes.

12 Q Okay. Based upon what she was telling you, that  
13 caused you to be concerned for her safety?

14 A Yes.

15 Q Okay. But the four or five times during the  
16 presence of her and Deputy Mandoyan, did you see anything  
17 that caused you to call the police on either of those four  
18 or five occasions you were with them?

19 A No.

20 Q And at the point in time when you were on  
21 ride-along and Mr. Mandoyan was there not wearing his  
22 uniform for lunch or dinner, did you contact anyone at the  
23 Sheriff's Department or tell them at the end of your  
24 ride-along that [REDACTED] wasn't safe?

25 A No.

1 HEARING OFFICER SCULLY: Okay. Was he yelling or  
2 is this just strong emotion?  
3 THE WITNESS: Yelling. He was yelling.  
4 HEARING OFFICER SCULLY: What did you hear?  
5 THE WITNESS: Not a lot. She went off into her  
6 bedroom. So I didn't hear specifics, but they were  
7 yelling.  
8 HEARING OFFICER SCULLY: Oh, okay. So you  
9 couldn't hear what they were talking about?  
10 THE WITNESS: No. Not what she was saying, no.  
11 HEARING OFFICER SCULLY: That was one occasion?  
12 THE WITNESS: (Inaudible response.)  
13 HEARING OFFICER SCULLY: "Yes"?  
14 THE WITNESS: Yes.  
15 HEARING OFFICER SCULLY: Okay. But the business  
16 about and he just constantly keep tabs on her and very  
17 controlling, that's based on what Ms. [REDACTED] told you, not  
18 what you personally observed.  
19 THE WITNESS: I did personally his texting and  
20 calling when I would be with her every time.  
21 HEARING OFFICER SCULLY: Okay. But you also said  
22 on the ride-along she's texting him; right?  
23 THE WITNESS: Yes. They were in communication,  
24 yes.  
25 HEARING OFFICER SCULLY: So in your

1 characterizing it as him harassing her, but on the other  
2 hand, she's texting him too, isn't she?

3 THE WITNESS: Right. Because if she didn't  
4 respond, it would just get worse. He would keep texting  
5 and keep calling until she would answer.

6 HEARING OFFICER SCULLY: Okay. Any redirect?

7 MS. ROAM: Yes.

8

9

REDIRECT EXAMINATION

10 BY MS. ROAM:

11 Q Ms. [REDACTED] on cross-examination, counsel asked  
12 whether or not [REDACTED] reported her concerns to any  
13 law enforcement agency.

14 Do you recall that question?

15 A Yes.

16 Q Do you know why [REDACTED] didn't report her  
17 concerns?

18 HEARING OFFICER SCULLY: Again, are you asking,  
19 did [REDACTED] tell you or did she have her own -- had  
20 you figured it out in your own mind after thinking about  
21 this for a while.

22 MS. ROAM: Thank you.

23 HEARING OFFICER SCULLY: We need to make sure we  
24 understand what's the basis of her answer in.

25 MS. ROAM: Yes. Thank you.

1 BY MS. ROAM:

2 Q Ms. [REDACTED] did you ever tell [REDACTED] she  
3 should report this to the police?

4 A Yes.

5 Q And what did she say to you?

6 A She did not want to. She was in fear of  
7 retaliation and what he would do and what would happen.

8 Q Did she tell you, specifically, what she was  
9 afraid he might he do?

10 A Affect her job in a negative way or come after  
11 her physically.

12 Q Thank you. And I realize that I did not go all  
13 the way through the exhibit with you, so I want you to  
14 turn back to Exhibit 27.

15 A Okay.

16 Q Now, you've testified that you don't recall when  
17 [REDACTED] sent you recording of the phone conversation; is  
18 that correct?

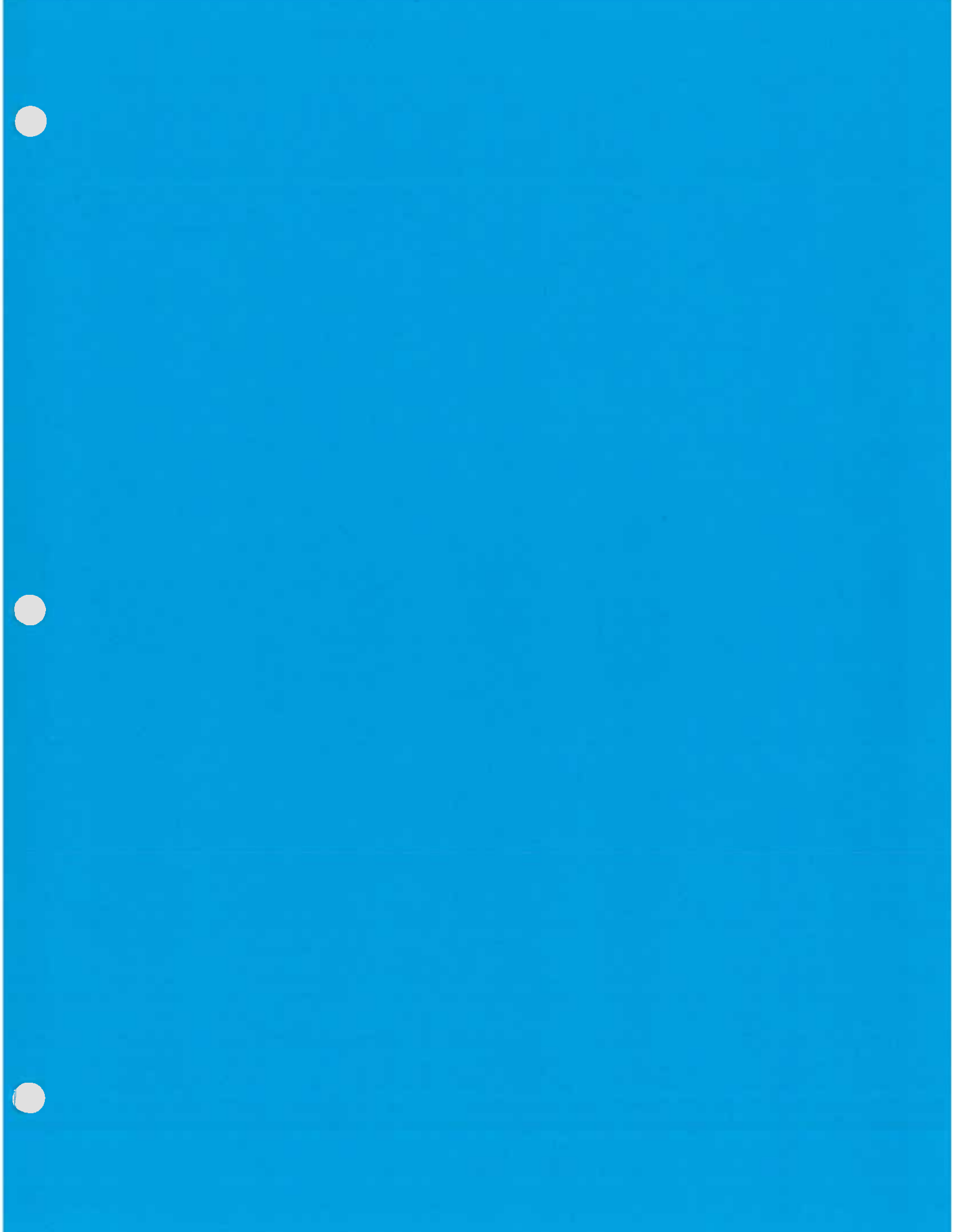
19 A Correct.

20 Q Does this e-mail refresh your recollection as to  
21 when it would have been?

22 A Yes.

23 Q Okay. And when was that?

24 A It's dated July 17, 2017. That's when I sent it  
25 to you. The original date would be December 11, 2013.



1 So as far as this text, you do not know who sent  
2 it?

3 THE WITNESS: No, sir.

4 HEARING OFFICER SCULLY: All right. Any other  
5 questions for Sergeant [REDACTED]

6 MS. ROAM: None. Thank you.

7 HEARING OFFICER SCULLY: Okay. Thank you for  
8 coming in. Appreciate your cooperation. We're taking a  
9 break now.

10 (A recess was taken.)

11 HEARING OFFICER SCULLY: Eileen, let's go on the  
12 record.

13 Lieutenant [REDACTED] you are still under oath.  
14 We're going to resume your direct examination. Do you  
15 understand that?

16 THE WITNESS: I do.

17 HEARING OFFICER SCULLY: Thank you.

18 Go ahead.

19 MS. ROAM: Thank you, sir.

20

21 DIRECT EXAMINATION (Continued)

22 BY MS. ROAM:

23 Q Lieutenant [REDACTED] I want to talk to you now  
24 about the videos of the nighttime incident at  
25 [REDACTED] apartment.

1 quick moment here.

2 HEARING OFFICER SCULLY: Thank you.

3 BY MR. GOLDFEDER:

4 Q Now, when a police agency takes in a firearm from  
5 anyone, is that documented as part of property that's  
6 booked into safekeeping at that particular unit or police  
7 agency?

8 A Yes. That would be common practice.

9 Q Okay. And after July 10, 2015, was it your  
10 understanding that Deputy Mandoyan was represented by  
11 counsel at that juncture?

12 A On what date?

13 Q After he was relieved of duty?

14 A Yeah. I believe there was a change of hands a  
15 couple times with his legal representation.

16 Q Okay. So it's your understanding that he was  
17 represented by an attorney or various attorneys at that  
18 juncture?

19 A Yes.

20 Q Okay. Do you know -- strike that.

21 Were you personally contacted by any attorney for  
22 Deputy Mandoyan after he was served with the restraining  
23 order from El Segundo Police Department?

24 A Well, that event occurred in July. I was  
25 assigned the case in November. I know that sometime in



1 January, Attorney Audra Call called just for an estimation  
2 of when I would be interviewing Deputy Mandoyan.

3 Q Okay. So would it be correct to say that between  
4 the time you first heard from this Attorney Audra Call and  
5 the time that the additional firearms were turned into the  
6 El Segundo Police Department on July 22, 2015, you don't  
7 have any personal knowledge of what any of  
8 Deputy Mandoyan's attorneys would have contacted in  
9 relation to the restraining order?

10 A No.

11 Q Okay.

12 A I know two different attorneys were mentioned by  
13 name, but I couldn't give the specifics of legal issues.

14 HEARING OFFICER SCULLY: Mr. Goldfeder, we're  
15 going to have to take our afternoon break now, so we're  
16 going to take a 15-minute break and then we'll resume at  
17 3:15. We're off the record.

18 (A recess was taken.)

19 HEARING OFFICER SCULLY: Let's go back on the  
20 record.

21 Mr. Goldfeder, please continue.

22 MR. GOLDFEDER: Thank you, Your Honor.

23 BY MR. GOLDFEDER:

24 Q So, Sergeant [REDACTED] let me ask you a question  
25 in regard to deputy sheriff equipment.