

EXHIBIT 41



COUNTY OF LOS ANGELES OFFICE OF INSPECTOR GENERAL

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March 5, 2019

To: Authorized Representative of the Los Angeles Sheriff's Department

The Office of Inspector General is conducting a review of the *ad hoc* discipline re-evaluation process in the case of Caren Mandoyan under Internal Affairs Bureau case number IV 2383392 (Mandoyan case).

Thank you for your help with the following questions. A response within ten (10) working days of this request is very much appreciated.

1. How was the Mandoyan case selected as the first case for re-evaluation?
2. Why was the Mandoyan case re-evaluated before the Department had drafted and/or implemented a policy outlining the Truth and Reconciliation process?
3. Why was the re-evaluation of the Mandoyan case initiated before the hearing date on Deputy Mandoyan's writ of mandate that was calendared for January 31, 2019?
4. Sheriff Villanueva stated that he gave the Mandoyan case to then Commander Steven Gross for re-evaluation during the first week of his administration. What was the date on which the Sheriff formally assigned the Mandoyan case to then Commander Gross for re-evaluation?
5. How was the assignment of the Mandoyan case to then Commander Gross memorialized? Please provide a copy of the assignment.
6. Who assigned Lt. Roberta Granek to produce the December 13, 2018 correspondence to Acting Chief Gross with the subject heading of "*Analysis of Administrative Investigation IV 2383392 – Deputies Caren Mandoyan and Amber Taylor*" (Granek Memorandum)?
7. What guidance and/or instructions were given to Lt. Granek, or any involved members of the Professional Standards Division, as to the preparation of the Granek Memorandum?
8. What was the deadline by which time Lt. Granek was expected to submit the memorandum to Chief Gross? Who gave Lt. Granek (or her team) the deadline?

9. Please identify all persons that assisted Lt. Granek in the preparation of the December 13, 2018 Granek Memorandum and include a description of what they contributed to the process of creating the Granek Memorandum.
10. Other than the materials identified in the first paragraph of the December 13, 2018 Granek Memorandum, please list any additional materials reviewed in the preparation of the December 13, 2018 Granek Memorandum.
11. Please describe any further investigation conducted during the preparation of the Granek Memorandum, identifying any new documents created and listing the employees that conducted the further investigation.
12. After the Granek Memorandum was completed, what actions related to the Mandoyan case were taken by the Department prior to the *ad hoc* Truth and Reconciliation Panel meeting on December 21, 2018?
13. How were the members of the *ad hoc* Truth and Reconciliation Panel selected?
14. Who selected the members of the *ad hoc* Truth and Reconciliation Panel?
15. In addition to the *ad hoc* Truth and Reconciliation Panel members, were any other current and/or former Department members involved in the re-evaluation or the selection of the Mandoyan case for re-evaluation?
16. In addition to the *ad hoc* Truth and Reconciliation Panel members, were any other current and/or former Department members asked to be involved in the re-evaluation of the Mandoyan case?
17. When were the *ad hoc* Truth and Reconciliation Panel members notified that they would be on the Panel?
18. When were the *ad hoc* Truth and Reconciliation Panel members notified that the Mandoyan case, in particular, had been selected for discipline re-evaluation?
19. How were the *ad hoc* Truth and Reconciliation Panel members notified that the Mandoyan case, in particular, had been selected for discipline re-evaluation?
20. Please describe the guidance and/or instructions given to the *ad hoc* Truth and Reconciliation Panel members on how to proceed with the re-evaluation of the Mandoyan case?
21. Who provided the *ad hoc* Truth and Reconciliation Panel members with guidance and/or instructions on how to proceed with the re-evaluation of the Mandoyan case?
22. When the *ad hoc* Truth and Reconciliation Panel convened on December 21, 2018, where did it meet?
23. What guidance was provided to the *ad hoc* Truth and Reconciliation Panel as to how to conduct the meeting and the process(es) to be followed in re-evaluating the Mandoyan case?
24. Please describe the process(es) followed during the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting.

25. Please list all the materials that the *ad hoc* Truth and Reconciliation Panel used in preparation for and during the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting.
26. How did the December 21, 2018 *ad hoc* Truth and Reconciliation Panel consider Deputy Mandoyan's possible membership in the Lennox/South Los Angeles Station "Reapers" clique, as reported by Deputy Taylor, in its re-evaluation of the Mandoyan case?
27. Who assisted the *ad hoc* Truth and Reconciliation Panel members in preparing for the December 21, 2018 Truth and Reconciliation Panel meeting? Please list all individuals that helped the *ad hoc* Truth and Reconciliation Panel members prepare for the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting.
28. How long did the *ad hoc* Truth and Reconciliation Panel meet on December 21, 2018?
29. What was the standard of proof the *ad hoc* Truth and Reconciliation Panel used in its re-evaluation of the Mandoyan case?
30. What notes and/or minutes were taken at the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting? Please provide any notes/minutes memorializing the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting.
31. Please list all persons present and the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting.
32. What were the results of the vote taken during December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting regarding the re-evaluation of the Mandoyan case?
33. Who was the ultimate decision maker at the December 21, 2018 *ad hoc* Truth and Reconciliation Panel meeting?
34. Who assigned Chief Elizer Vera to produce the December 27, 2018 correspondence to Sheriff Alex Villanueva with the subject heading of "Truth and Reconciliation Panel Review of IAB IV#2383392, Deputy Caren Mondoyan (*sic*) Matter" (Vera Memorandum)?
35. Please identify all persons that assisted Chief Vera in the preparation of the December 27, 2018 Vera Memorandum, identifying the persons by name and describing what they contributed to the process of creating the Vera Memorandum.
36. Please list all materials reviewed in the preparation of the December 27, 2018 Vera Memorandum.
37. Please describe any further investigation conducted during the preparation of the Vera Memorandum, identifying any new documents created and listing the persons that conducted the further investigation.
38. Sheriff Villanueva has stated that an outside attorney had been retained to advise on the Mandoyan case.
 - (a) Who was the outside attorney[s] retained by the Department for the Mandoyan case?
 - (b) When was the attorney[s] retained?

- (c) What services were provided by this attorney[s]?
 - (d) On what dates were these services provided?
 - (e) How was the outside attorney[s] paid for his/her services?
 - (f) What input, comment, and/or advice did the outside attorney[s] provide with respect to the Mandoyan case?
39. Did the outside attorney[s] provide any input, comments, and/or advice about the settlement agreement or settlement negotiations? If so, what was the input, comment and/or advice provided?
40. What is the current status of the Truth and Reconciliation policy?
41. What is the current status of the Truth and Reconciliation discipline re-evaluation process?
42. Sheriff Villanueva has stated that there are at least six other cases that he would like to see go through a discipline re-evaluation process.
- (a) What are the names of the six cases?
 - (b) Have any of the six cases referred to by the Sheriff been reviewed by the Department?