

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 COUNTY OF ORANGE (CENTRAL JUSTICE CENTER)
3 Case No. 30-2024-01394359-CU-OE-CJC

4 _____ x
5 ROSS BYER, an individual, :
6 Plaintiff, :
7 v. :
8 CITY OF LA PALMA, a public :
9 entity; and DOES 1 through :
10 Defendants. :
11 _____ x

12
13 VIDEO-RECORDED DEPOSITION OF JAY KYOO CHOI
14 (CONDUCTED REMOTELY VIA VIDEOCONFERENCING)

15 August 4, 2025

16 10:15 a.m. PST

17
18
19
20
21
22
23 Reported remotely by Anne Torreano,
24 California CSR No. 10520, Certified Stenographic
25 Reporter.

1 me, and we'll stop the deposition.

2 Okay?

3 A. Okay.

4 Q. You're currently employed by La Palma?

10:20:50 5 A. Yes.

6 Q. And are you currently employed as a police
7 officer?

8 A. Yes.

9 Q. When were you hired?

10:20:59 10 A. I was hired, I believe, March of 2022.

11 Q. Okay. Have you ever been deposed before?

12 A. Yes.

13 Q. When?

14 A. When I was working in the City of Baldwin
10:21:17 15 Park.

16 Q. Okay. And what was the -- was that the
17 only time you were deposed?

18 A. Yes.

19 Q. Okay. And what was that deposition in
10:21:35 20 regard to? Was it a case you were a party to, or
21 were you a witness?

22 A. I was a witness.

23 Q. Okay. And what kind of case was it?

24 A. It was a -- it was a case involving a
10:21:55 25 death.

1 A. Yes.

2 Q. Okay. Do you recall anything else he said
3 about that? Like how he said being proactive would
4 relate to Sgt. Koh?

10:28:04 5 A. That he -- from what I remember, to be
6 proactive by going out there, making arrests, and
7 conducting traffic stops.

8 Q. Okay. Do you recall anything else that
9 Ofc. Lopino said about Sgt. Koh?

10:28:22 10 A. No. Those were the two key points that I
11 specifically remember.

12 Q. Okay. Do you recall any other officer in
13 La Palma ever making comments to you about Sgt. Koh
14 and him being, you know, difficult to work with or
10:28:41 15 unfair?

16 A. No.

17 Q. Have you ever learned that a private
18 citizen had made a complaint against Sgt. Koh?

19 A. No.

10:28:55 20 Q. What is -- what's your nationality?

21 A. I am Korean-American.

22 Q. How long have you been a police officer?

23 A. For about ten years.

24 Q. Okay. And you said you started with
10:29:21 25 La Palma in about March of 2022. So where did you

1 work before that?

2 A. I worked for Baldwin Park.

3 Q. Okay.

4 A. And prior to that I worked in the City of
10:29:40 5 Imperial.

6 Q. Okay. And during -- did you give me an
7 estimate of the years you worked for Baldwin Park?

8 A. Yes, from, I believe, 2019 to 2022.

9 Q. Okay. And then the years that you worked
10:29:58 10 for City of Imperial?

11 A. Yes.

12 Q. When was that? What years would that have
13 been?

14 A. That would have been 2016 --

10:30:08 15 Q. Okay.

16 A. -- to 2019.

17 Q. Okay. And did you go through your police
18 academy while you were employed with the City of
19 Imperial?

10:30:23 20 A. No. I was self-sponsored.

21 Q. Okay. Do you know what the years were that
22 you did your police academy training?

23 A. Yes, it was from 2014 -- I believe from
24 August of -- August 2014 to May of 2015.

10:30:57 25 Q. And after you completed the police academy,

1 document was produced by the City, and this reflects
2 traffic stops that you made between May 31st,
3 2022 --

4 A. This is my traffic stops?

10:43:00

5 Q. Yes.

6 -- and June 8th, 2023. You've never seen
7 this document before?

8 A. No.

9 Q. Okay. Now, you said -- so you were hired
10:43:15 10 in March of 2022; correct?

11 A. Yes.

12 Q. So by June, do you recall whether you were
13 on solo patrol yet by June of 2022?

14 A. I don't recall.

10:43:34 15 Q. Okay. You said your training lasted --
16 what was it? Three or four months? I can't
17 remember what you said.

18 A. Yeah, approximately four months.

19 Q. Okay. So it might have been a little bit
10:43:43 20 after June. Do you know if you were on solo patrol
21 by July?

22 A. I believe I was.

23 Q. Okay. And in early -- well, early on when
24 you started solo patrol, do you recall if you were
10:44:15 25 patrolling Beat 1 or Beat 2 when you first went out

1 officer.

2 Q. Okay. Do you recall as soon as you started
3 doing solo patrol that you always patrolled Beat 2?

4 A. Most -- yes. Majority of the times, yes.

10:46:09 5 Q. Okay. And that was even as soon as you got
6 off of your training?

7 A. Yes.

8 Q. Did anyone at the La Palma Police
9 Department tell you that the number of stops that
10:46:39 10 you making in 2022 or 2023 was somehow insufficient
11 or low?

12 A. No.

13 Q. And in 2022 and 2023, no one at La Palma
14 ever told you that you needed to increase the number
10:47:00 15 of stops you were making; correct?

16 A. Yes, that's correct.

17 Q. And in 2022 and 2023, no one ever told you
18 at La Palma that you needed to be more proactive;
19 correct?

10:47:20 20 A. Yes, that's correct.

21 Q. Do you recall what your overall scores were
22 on your performance evaluations in 2022 and 2023?

23 A. I believe at that time I was very
24 proactive. I had a good evaluation due to leading
10:47:59 25 traffic stops, arrests, and all the categories.

1 Q. And so is it your recollection that the
2 reviews -- how many reviews did you receive from
3 Sgt. Koh?

4 A. I believe one.

10:48:20 5 Q. Okay. And that review, you believe, was
6 positive?

7 A. Yes.

8 Q. Do you recall if it was "meets
9 expectations" or "exceeds expectations"?

10:48:33 10 A. I believe some were exceed and some were
11 just meets the expectation.

12 Q. Do you recall if it was -- do you recall
13 what the overall score was?

14 A. Overall I know that I -- I just remember
10:48:49 15 being pretty good.

16 Q. Okay. I'm going to show you another
17 document.

18 A. Sure.

19 Q. This document's being marked Exhibit 15.

10:49:09 20 (PLAINTIFF'S EXHIBIT 15 MARKED.)

21 BY ATTORNEY PETRONELLI:

22 Q. And same with the other -- with the other
23 exhibit. Just take a look at it, and then this one
24 you can let me know if you recognize this.

10:49:28 25 A. Okay.

1 Q. Okay. If I told you that he started his
2 solo patrol on September 1st, 2022, does that
3 sound -- does that refresh your recollection?

4 A. I'm not good with timelines, but I believe
5 so. Around that time.

10:55:45

6 Q. Okay. Now, if we look at the first page --
7 now, I don't know if you'd like -- if you'd like,
8 what I can do is drop this into the chat so that you
9 can pull it up on your screen.

10:56:31

10 A. Okay.

11 Q. I'd like you to look at this document and
12 confirm for me that on this first page, there's 54
13 stops between May 31st, 2022, and August 29th, 2022.

14 You want me to drop it in the chat so you
15 can pull it up on your screen? And if you'd like
16 to, we could also take a break if you want to look
17 at it off the record.

10:57:00

18 ATTORNEY COHEN: Excuse me. Are you asking
19 him to just count?

10:57:10

20 ATTORNEY PETRONELLI: Yeah, I'm asking him
21 to confirm that the number of stops here, there's 54
22 stops.

23 ATTORNEY COHEN: I'm going to object to
24 this. He's never seen this document before. He
25 didn't create the document. His name is not on the

10:57:20

1 in supervising Ross?

2 ATTORNEY COHEN: Just objection. Compound
3 and vague. Are you asking did Byer tell him he
4 complained? Did someone else tell him that Byer
11:15:53 5 complained?

6 BY ATTORNEY PETRONELLI:

7 Q. I'm asking if you ever heard that, if you
8 ever heard that Ross Byer reported or complained to
9 one of the captains about Sgt. Koh.

11:16:06 10 A. No, not that I recall.

11 Q. Did you ever -- did you ever learn that at
12 some point Ofc. Byer complained to the human
13 resources department at La Palma about Sgt. Koh?

14 A. No.

11:16:28 15 Q. In the -- whether it was during the time
16 when Ofc. Byer was there or after he left the
17 department, do you recall anyone from human
18 resources contacting you to ask you questions
19 concerning issues that were raised about Sgt. Koh?

11:17:05 20 A. No.

21 Q. Do you recall whether it was during the
22 time that Ofc. Byer worked there or after he left
23 the department if anyone within the police
24 department came to you and asked you questions
11:17:21 25 concerning issues that had been raised about

1 Sgt. Koh with respect to discrimination?

2 A. No.

3 Q. Did anyone at the police department ever
4 ask you questions during the time that Ofc. Byer was
11:17:37 5 there or after he left about whether there had been
6 directives from Sgt. Koh to engage in racial
7 profiling of citizens?

8 A. No.

9 Q. Did anyone from human resources ever
11:17:52 10 contact you during the time that Ofc. Byer worked
11 there or thereafter to ask you questions about
12 whether or not you had heard or learned of any
13 directives to engage in racial profiling in the La
14 Palma Police Department?

11:18:07 15 A. No.

16 Q. Can you give me an estimate of how long it
17 was that you and Ross were shift partners?

18 A. To the best of my knowledge, two to four
19 months.

11:18:31 20 Q. Is that an estimate?

21 A. Yeah.

22 Q. Okay. And during that time, that two to
23 four months when you worked with Ofc. Byer, did you
24 form an opinion about whether or not Ofc. Byer was
11:18:49 25 performing well or not well as a police officer?

1 ATTORNEY COHEN: Objection. Lack of
2 foundation. He's not an expert. He's a fact
3 witness. There's no basis for him to provide an
4 opinion about anything.

11:19:03

5 ATTORNEY PETRONELLI: Well, I disagree.
6 BY ATTORNEY PETRONELLI:

7 Q. You can answer the question.

11:19:22

8 A. I enjoyed working with Ofc. Byer, and
9 Ofc. Byer being a new officer, he was still in the
10 learning stage of police work, so I did not have
11 either a positive or a negative opinion about
12 Ofc. Byer when it comes to police work.

13 Q. Gotcha.

11:19:43

14 And you -- did you understand that
15 Ofc. Byer, he was -- you had a lot more experience
16 than him in prior departments?

17 A. Yes.

18 Q. You'd been an officer a lot longer than he
19 had; correct?

11:19:54

20 A. Yes.

21 Q. And you said you enjoyed working with
22 Ofc. Byer as shift partner; correct?

23 A. Yes.

24 Q. And why do you say that?

11:20:07

25 A. It's hard to say, but there are officers

1 that -- he did have a good attitude. He was very
2 easy to work with. So that in itself is a good
3 thing as a beat partner.

11:20:30

4 Q. And at some point, did you learn that he
5 was resigning?

6 A. No.

7 Q. Okay. Well, at some point, did you learn
8 that he was no longer going to be working with the
9 La Palma Police Department?

11:20:40

10 A. Yes.

11 Q. And when you heard that, did you have any
12 feelings one way or another about that?

13 ATTORNEY COHEN: Objection. Lack of
14 relevance of his feelings.

11:20:54

15 BY ATTORNEY PETRONELLI:

16 Q. Go ahead.

17 A. It was -- for me it was sad. I was sad
18 because I worked with him for quite a while, and we
19 built a good relationship. Me and him were about
20 the same age, and I believe as -- just aside from
21 being police officers, we connected as a person.

11:21:11

22 Q. Did -- hold on one second.

23 Okay. I'm going to show you another
24 document. This is going to be marked Exhibit 11.

11:22:25

25 (PLAINTIFF'S EXHIBIT 11 MARKED.)

1 BY ATTORNEY PETRONELLI:

2 Q. Are you able to see that on your screen?

3 A. Yes.

4 Q. Okay. And I'm just going to scroll through
11:22:38 5 this document. It's just a two-page document. It's
6 Bates-stamped City's R RTP 1-0607 through 0608.

7 Do you recall ever seeing this document?

8 A. No.

9 Q. And I think you previously said that no one
11:23:07 10 at La Palma ever asked you any questions about
11 concerns that Ofc. Byer had raised with human
12 resources about Sgt. Koh; correct?

13 A. Yes.

14 Q. So Crystal Wilkerson, you never spoke with
11:23:25 15 her?

16 A. No.

17 Q. Okay. About Sgt. Koh?

18 A. No.

19 Q. Okay. Or about any of the concerns
11:23:32 20 Ofc. Byer had raised; correct?

21 A. Yes.

22 ATTORNEY COHEN: Objection. Lack of
23 foundation as to concerns raised. I'm not sure he's
24 testified to concerns raised.

11:23:43 25 BY ATTORNEY PETRONELLI:

1 Q. Yeah, I'm just asking if Crystal Wilkerson
2 or anyone in human resources ever informed you that
3 Ofc. Byer had raised some issues with human
4 resources about Sgt. Koh and ask you questions.

11:24:01

5 A. No.

6 Q. The -- if you look at the highlighted
7 portion on the first page and -- well, actually,
8 starting with the nonhighlighted portion, it says,
9 "Employee stated six month of tenure was good. Next
10 six month was under the direction of Sgt. Koh and
11 working with Ofc. Choi, who was also a newly hired
12 officer and a witness to all interactions with
13 supervisor."

11:24:27

14 Do you see that?

11:24:38

15 A. Yes.

16 Q. Do you -- and then you said you thought it
17 was two to four months that you were partners with
18 Ofc. Byer. Could it have been six months, to your
19 recollection, or you believe it was the two to four?

11:24:51

20 A. It could have been -- it could have been --
21 I believe it was four due to the fact that we have
22 the shift change every four months.

23 Q. Okay. What is that? What's a shift
24 change?

11:25:11

25 A. So let's say, for example, if me and Ross

1 started shift together as beat partners, we'll be
2 assigned to that shift for four months before it
3 gets changed to a different four months.

11:25:39

4 Q. Okay. And what happens when you -- when
5 you were -- had a shift change at that four-month
6 mark? Did you change supervisors as well?

7 A. Yes.

8 Q. Okay. So is that your recollection, that
9 you only reported to Sgt. Koh for four months?

11:25:51

10 A. From my recollection, yes.

11 Q. Okay. Now, going back to this document,
12 Exhibit 11, if you look, it's the next highlighted
13 section, and it's under -- it is the third bullet
14 point in under the dark bullet point, and it says,

11:26:15

15 "Byer stated that Koh treats him differently than
16 Ofc. Choi."

17 You see that?

18 A. Yes.

11:26:26

19 Q. In your observation in the time that you
20 and Ofc. Byer reported to Sgt. Koh, did you observe
21 that Sgt. Koh treated you differently than he
22 treated Ofc. Byer?

23 ATTORNEY COHEN: Objection. Vague as to
24 nature of treatment.

11:26:42

25 But you can answer if you understand what

1 he's asking.

2 THE WITNESS: Differently? I don't -- I
3 don't know if there's any difference other than
4 negatively or positively. I'm not really sure
11:27:00 5 differently. Yeah, Sgt. Koh has the same
6 expectations whether you're new or whether you have
7 experience. Differently? In that sense, I'd say
8 no.

9 BY ATTORNEY PETRONELLI:

11:27:17 10 Q. Okay. The next bullet point down that's
11 highlighted, it says, "Openly bragging to Ofc. Choi
12 about dumping calls on Byer."

13 Do you recall during the time that you
14 worked with Ofc. Byer and reported to Sgt. Koh that
11:27:49 15 Sgt. Koh would go out and conduct traffic stops and
16 then assign those stops to an officer that was on
17 patrol?

18 A. Yes.

19 Q. Okay. And do you recall those being
11:28:03 20 referred to within the department as "sergeant
21 specials"?

22 A. Yes.

23 Q. And during the time that you worked with
24 Ofc. Byer for La Palma and reported to Sgt. Koh, do
11:28:15 25 you recall Sgt. Koh ever telling you that he was

1 assigning sergeant specials to Ofc. Byer?

2 A. No.

3 Q. Okay. You don't recall him ever saying
4 that to you?

11:28:30 5 A. No.

6 Q. Okay. Do you ever recall Sgt. Koh bragging
7 to you about dumping stops on Ofc. Byer?

8 A. No.

9 Q. Were there ever times when Sgt. Koh
11:28:59 10 conducted a traffic stop or a sergeant special, as
11 they're referred to, and assigned it to Ofc. Byer,
12 and you offered to take the stop for Byer, but Koh
13 would not allow you to do it?

14 A. Yes.

11:29:21 15 Q. Okay. What do you recall about that?

16 A. Well, first off, the sergeant special with
17 Sgt. Koh, he has done that to myself and all the
18 officers throughout our department. In saying that,
19 since Ofc. Byer was new, like, I would voluntarily
11:30:00 20 ask Sgt. Koh if I could just handle this call. And
21 I would just volunteer and ask Sgt. Koh, and I
22 believe there is a time where he didn't allow me to
23 do that.

24 Q. Okay. What do you recall about that
11:30:23 25 situation?

1 A. I don't remember exactly what call it was,
2 but it was during a traffic stop, and I had
3 volunteered once or twice -- I believe one time
4 where I did volunteer that I would handle the call.

11:30:40

5 Q. Okay.

6 A. And Sgt. Koh had denied my request.

7 Q. Okay. And is the reason that you offered
8 to take that call is because Byer was conducting an
9 arrest?

11:30:55

10 A. I don't remember that.

11 Q. Okay.

12 A. I don't remember.

13 Q. Do you recall why you offered to take the
14 call?

11:31:00

15 A. To be honest, I wanted the stat.

16 Q. What does that mean?

17 A. I wanted to get another arrest on my
18 record.

19 Q. Gotcha. Okay.

11:31:13

20 And when he told you no about taking that
21 stop, do you recall if that was in person or over
22 the radio? How was it communicated to you?

23 A. I believe it was in person.

24 Q. Okay. And in the time that you and Ross

11:31:34

25 Byer were shift partners and reported to Sgt. Koh,

1 did you recall whether or not Sgt. Koh assigned more
2 sergeant specials to you or whether he assigned more
3 to Ofc. Byer?

11:31:58 4 A. It was Ofc. Byer, and the fact of the
5 matter was that I was out there making a lot of
6 arrests, conducting a lot of traffic stops.

7 Q. And I'm just trying to get it clear -- a
8 clear record.

9 So it's your -- in your observation --

11:32:15 10 A. Yes.

11 Q. -- in the time that you worked with
12 Ofc. Byer and reported to Sgt. Koh --

13 A. Yes.

14 Q. -- it was your observation that Sgt. Koh
11:32:25 15 assigned more sergeant specials to Ofc. Byer than to
16 yourself; correct?

17 A. I can't recall how many, but yes.

18 Q. Okay. Can you give me an estimate of how
19 many sergeant specials Sgt. Koh assigned to you in
11:32:42 20 the time that you reported to him?

21 A. Five or more.

22 Q. Okay. Can you recall in the -- and again,
23 an estimate is fine. Can you give me an estimate of
24 how many sergeant specials you recall him giving to
11:33:09 25 Ofc. Byer?

1 ATTORNEY COHEN: Objection. Calls for
2 speculation, lack of foundation.

3 You can answer if you know.

4 THE WITNESS: I don't remember. I don't
11:33:18 5 recall.

6 BY ATTORNEY PETRONELLI:

7 Q. Okay. Do you recall if it was -- I mean,
8 how much more frequently you would -- or Ofc. Byer
9 would get assigned sergeant specials? Would it --
11:33:27 10 you know, he would assign, you know, 50 percent less
11 to you, or would he assign, you know, three times as
12 more to Ofc. Byer?

13 And I don't want you to guess, but if you
14 can give me an estimate, I'd like to know if you
11:33:45 15 have an estimate.

16 ATTORNEY COHEN: Objection. Asked and
17 answered, calls for speculation.

18 You can answer.

19 THE WITNESS: Definitely -- I can't give
11:33:53 20 you an estimate of how many, how many percent, but
21 definitely more than myself. More than me.

22 BY ATTORNEY PETRONELLI:

23 Q. Okay. And was that true throughout the
24 entire time that you and Ofc. Byer reported to
11:34:11 25 Sgt. Koh?

1 A. Yes.

2 Q. Now, going back to this Exhibit 11, still
3 on the first page, the next highlight down it says,
4 "Byer talked to Capt. Amend at least three times
11:34:56 5 about issues he felt he was having with Sgt. Koh."

6 Do you see that?

7 A. Yes.

8 Q. Did you ever learn that Ofc. Byer had
9 spoken with Capt. Amend regarding concerns he had
11:35:06 10 about Sgt. Koh?

11 A. No.

12 Q. Do you ever recall learning about a
13 statement that Sgt. Koh had allegedly made regarding
14 an all-Korean police department or an all-Korean
11:35:25 15 shift?

16 A. No.

17 Q. You never heard anything about that,
18 whether it was from Ross Byer or anyone else?

19 A. No.

11:35:32 20 Q. If you could -- on the last page, the
21 second page of this document, Exhibit 11, this final
22 bullet point, if you could read this to yourself and
23 let me know when you're finished.

24 A. Yeah, do you want me to read it aloud?

11:35:51 25 Q. No, read it to yourself.

1 June 28th, 2023, to Crystal Wilkerson.

2 Do you know who Crystal Wilkerson is?

3 A. Yes.

4 Q. And who is she?

11:40:12 5 A. Our human resource employee.

6 Q. Is there anyone else who works in human
7 resources at La Palma that you're aware of besides
8 Crystal Wilkerson?

9 A. No.

11:40:23 10 Q. And Crystal Wilkerson is -- her husband was
11 Capt. Wilkerson; correct? Or is Capt. Wilkerson?

12 A. Yes.

13 Q. During this time period, June of 2023, do
14 you recall what position her husband was working in
11:40:54 15 the La Palma Police Department?

16 A. June -- June of 2023. I believe as a
17 captain.

18 Q. Okay. And how many captains were there in
19 the La Palma Police Department during that time?

11:41:18 20 A. Two.

21 Q. Who was the other captain?

22 A. I believe it was Capt. Guerrero. Oh, no.
23 I'm sorry. It was Capt. Amend.

24 Q. Okay. And who was chief during this time?

11:41:34 25 A. I believe it was Chief Kim.

1 Q. What is Crystal Wilkerson's husband --
2 what's his first name?

3 A. Ron.

11:42:12

4 Q. And at some point was Ron Wilkerson the
5 chief of the La Palma Police Department?

6 A. Yes.

7 Q. When?

8 A. I believe it was towards the end of 2023.

9 Q. Okay. How long was he chief for?

11:42:33

10 A. Approximately a year.

11 Q. And after that, did he retire?

12 A. Yes.

13 Q. When did he retire?

11:42:58

14 A. I believe like mid of 2024, like May or
15 June.

16 Can you give me one second? I need to plug
17 in. My battery's running out. Just give me about
18 three seconds. Is that okay?

19 Q. Yeah.

11:43:11

20 A. All right. Thanks.

21 Okay.

22 Q. Going back to this Exhibit 12 --

23 A. Yes.

11:43:48

24 Q. -- on the second page -- it's the third
25 paragraph down. It's highlighted on.

1 incidents following Ross Byer leaving the
2 department?

3 A. No.

4 Q. Are you aware of any investigation the
11:47:43 5 police department did or any other department did
6 into any concerns Ross Byer raised with them?

7 A. No.

8 Q. Do you ever talk to Ofc. Ron Lopino still?

9 A. No.

11:48:20 10 Q. When was the last time you spoke with him?

11 A. I've seen him two or three times at Orange
12 County Jail when I was transporting an arrestee.

13 Q. Okay. During the -- during your time at
14 La Palma, do you recall working with a police
11:48:48 15 officer named Ofc. Goble?

16 A. Yes.

17 Q. Okay. Did you ever work with him --

18 A. Yes.

19 Q. -- on the same shift?

11:49:03 20 And when?

21 A. It was for -- he was never a shift partner
22 with me, but whenever I would work overtime, I would
23 work with him. I worked with him a couple times.

24 Q. Okay. Did you ever hear that Ofc. Goble
11:49:27 25 had complained about Sgt. Koh to one of the

1 when you contact people.

2 Q. Okay. And do you recall anything else that
3 Sgt. Koh told you, you know, when you were assigned
4 to his shift about his expectations? Do you recall
01:21:59 5 anything that he said?

6 A. Nothing in particular other than just go
7 out there and be proactive, conduct traffic stops,
8 be visible.

9 Q. Okay. So I'd like for you -- have you
01:23:30 10 personally ever thought, heard, or learned of
11 something negative about Ofc. Byer in terms of his
12 performance for La Palma?

13 ATTORNEY COHEN: Objection. Compound.
14 Thought, heard, learned.

01:23:53 15 BY ATTORNEY PETRONELLI:

16 Q. Have you yourself ever thought anything
17 negative about Ofc. Byer in terms of his performance
18 as an officer?

19 ATTORNEY COHEN: Asked and answered.

01:24:07 20 Go ahead. I think you answered the
21 question, but go ahead.

22 THE WITNESS: Not that I could think of. I
23 got along very well with Ofc. Byer. I don't
24 remember an issue -- I don't remember an issue with
01:24:25 25 Ofc. Byer or having negative conversations with him

1 or anything like that about police work or anything
2 like that.

3 BY ATTORNEY PETRONELLI:

01:24:38

4 Q. Have you ever heard others talk negatively
5 about Ofc. Byer or his performance for the La Palma
6 Police Department?

7 A. No.

01:24:53

8 Q. Okay. And have you ever learned of
9 anything negative about Ofc. Byer in terms of his
10 performance for the La Palma Police Department?

11 A. The only thing that I heard was -- I don't
12 remember exactly who had told me, but I believe he
13 was -- he was involved in a traffic collision, and
14 he -- I believe he fell asleep during duty.

01:25:29

15 Q. Okay.

16 A. And --

17 Q. Go ahead.

18 A. Yeah, and that was it. I have never seen
19 it.

01:25:36

20 Q. And do you recall who told you those
21 things?

01:25:52

22 A. No. I just overheard. I'm not a big
23 talker at the department. They know that I'm not a
24 talker, so they don't really talk to me at all. So
25 I just overhear things, but I don't remember exactly

REPORTER'S CERTIFICATE

I, Anne Torreano, Certified Shorthand
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ANNE M. TORREANO, CSR No. 10520