

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE (CENTRAL JUSTICE CENTER)

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ROSS BYER, an individual,	)	Case No: 30-2024-01394359-
	)	CU-OE-CJC
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
CITY OF LA PALMA, a public	)	
entity; and DOES 1 through	)	
100, inclusive,	)	
	)	
Defendants.	)	

REMOTE DEPOSITION OF

CRYSTAL L. WILKERSON,

California commencing at 1:03 P.M. PDT on
TUESDAY, MARCH 18, 2025, before LILIANA RODRIGUEZ,
Certified Shorthand Reporter 13783, in and for the State
of California.

1 A. Yes.

2 Q. Is there any reason that you feel like you can't
3 give your best testimony today?

4 A. No.

01:09 5 Q. If you feel like at any point during today you
6 can't give your best testimony anymore, just let me know
7 so we can stop the deposition. I don't want your
8 testimony if there's some reason that -- you know,
9 something happens today that you can't give your best
01:10 10 testimony, tell me and we'll stop. Okay?

11 A. Sounds good.

12 Q. Are you currently employed by La Palma?

13 A. Yes.

14 Q. And what's your current position?

01:10 15 A. Human resources analyst.

16 Q. Okay. And do you have a -- like, a human
17 resources manager or director that you report to?

18 A. Correct.

19 Q. And who is that?

01:10 20 A. My director is Ryan Hallett. He's the assistant
21 city manager.

22 Q. Does he have an HR title, or is it just city
23 manager?

24 A. It's assistant city manager.

01:10 25 Q. Okay. And so he -- does he essentially act as

1 the -- like, the highest ranking HR employee?

2 A. Yes.

3 Q. Okay. And other than meeting with your attorney,
4 did you do anything else to prepare for today's
01:11 5 deposition, like talk to anybody or view any documents?

6 A. The only thing I viewed was the conversation that
7 I had that I took notes on when I met with Mr. Byer.

8 Q. Okay. And was that -- do you remember if that
9 was the document that you typed up, or was it, like, an
01:11 10 e-mail between and you Ross?

11 A. It was the one that I typed up.

12 Q. Okay. Other than that, did you -- did you review
13 any other documents in preparation for today?

14 A. No, sir.

01:11 15 Q. And did you talk with anybody other than your
16 attorneys about your deposition today?

17 A. No, sir.

18 Q. And the notes that you -- that you took during
19 that meeting with Mr. Byer, did you -- where did you
01:12 20 view those? Where did you access the ones that you
21 looked at? Was it on your computer?

22 A. Yeah. They were in my electronic file.

23 Q. Okay. And is there anything else in that -- in
24 that same file specific to Mr. Byer?

01:12 25 A. No.

1 I'm just asking if you have any understanding as
2 to when the City of La Palma should or does investigate
3 human resources-type issues?

4 A. Yeah. I don't know. Sorry.

01:35 5 Q. Okay. That's okay.

6 Do you -- let me ask -- let me ask generally
7 about that -- of the notes I know that you said you
8 looked at of that meeting that you had with Ross Byer.

9 Do you recall those notes we talked about
01:36 10 earlier?

11 A. Yeah.

12 Q. Okay. So after those notes were taken, is it
13 accurate to say that you're not aware of any
14 investigation that the City of La Palma did to
01:36 15 investigate those issues that Mr. Byer raised with you
16 in that meeting?

17 A. Correct. I have no idea.

18 Q. You have no idea. Okay.

19 But you're not aware of any investigation that
01:36 20 was done, correct?

21 A. Correct.

22 Q. And following -- involved in that meeting was
23 yourself and Ryan Hallett, correct?

24 A. No.

01:37 25 Q. Who was in that meeting with you and Mr. Byer?

1 A. Joseph Cisneros. He's our assistant to city
2 manager at that time.

3 Q. Okay. So was he -- was -- was he assistant to
4 the city manager or was he assistant city manager?

01:37 5 A. Assistant to the city manager.

6 Q. Okay. Okay. At that time was Ryan Hallett still
7 assistant city manager?

8 A. I believe Ryan at that time was the
9 administrative services director.

01:37 10 Q. Okay. Who --

11 A. But he -- I'm sorry, Christian. He was always in
12 that role. It was just a title change.

13 Q. Just a title change. Okay.

14 So is it fair to say that during that time period
01:37 15 when you have this meeting with Mr. Byer that Ryan
16 Hallett was still the person that you reported to in HR?

17 A. Yes, sir.

18 Q. Okay. So after that meeting that you had with
19 Mr. Byer where you took those notes, did you pass those
01:38 20 notes along to Ryan Hallett?

21 A. Yes.

22 Q. If you -- okay.

23 And do -- what, if anything, did Mr. Hallett do
24 with those -- those notes, if you know?

01:38 25 A. I don't know.

1 Q. Okay. So is it true to say that then after you
2 turned those notes from that meeting with Mr. Byer over
3 to Mr. Hallett that you never heard anything about -- or
4 he never followed up with you about what occurred in
01:38 5 that meeting; is that accurate?

6 A. Yeah. I don't recall him getting back to me on
7 the situation.

8 Q. Okay. And is it -- is it accurate that you're
9 not aware of him ever discussing the situation with
01:38 10 Mr. Byer?

11 A. I have no idea if Ryan has or not.

12 Q. Okay. And you have no idea if he discussed it
13 with anyone at the police department, correct?

14 A. Yes. I don't know if he talked to management
01:39 15 over there.

16 Q. Okay. Have you ever heard of a citizen, not an
17 employee but a private citizen, filing a complaint
18 against a police officer in La Palma?

19 A. I have no idea. It hasn't come over my desk.

01:39 20 Q. Okay. So it -- so you have never -- you never
21 heard of something like that.

22 A. It hasn't come to me, no.

23 Q. Okay. And you -- and even in your role -- so
24 what I'm asking is your personal knowledge, right? So
01:39 25 if you learned about it, like, by reading it in the

1 A. I don't remember when all of this started
2 happening. I want to say a couple years maybe.

3 Q. Couple years ago from now?

4 A. From today, yeah.

01:46 5 Q. Okay. Okay. That's fine.

6 And do you recall that part of what -- well, you
7 recall that he complained about Sergeant Koh, correct?

8 A. Yes.

9 Q. And he complained that Sergeant Koh had
01:46 10 instructed him to engage in what Mr. Byer believed to be
11 racial profiling, correct?

12 A. Yes.

13 Q. First he told you that he had previously
14 complained about that to Captain Jesse Amend, correct?

01:46 15 A. Yes.

16 Q. Okay. And he told you that Koh had instructed
17 him -- oh. My mistake. You can strike that.

18 And do you recall that after that meeting you had
19 with Mr. Byer where you took those notes that he sent
01:47 20 you an e-mail several weeks later with additional
21 details about his complaints?

22 A. Yeah. I vaguely remember that.

23 Q. Okay. Do you recall what, if anything, you did
24 after you received that e-mail?

01:47 25 A. Yes. All the information was given to my boss to

1 further investigate.

2 Q. Okay.

3 MR. PETRONELLI: Can we go ahead and take a --
4 can we take a five-minute break real quick?

01:47 5 MS. COHEN: Sure.

6 MR. PETRONELLI: Off the record. Sorry. It's
7 only because I have a -- there's a gardener at the
8 building right now, and they're doing leaf blowing, so
9 I'm hoping if I give them a few minutes they'll stop.
01:47 10 So we'll be back in -- let's call it --

11 MS. COHEN: We all have that problem.

12 MR. PETRONELLI: Let's call it like 1:55.

13 MS. COHEN: Okay.

14 MR. PETRONELLI: All right. Thank you.

01:47 15 THE VIDEOGRAPHER: We are now off the record.

16 The time is 1:47 p.m. Pacific time.

17 (Off the record.)

18 THE VIDEOGRAPHER: We are now on the record. The
19 time is 1:55 p.m. Pacific time.

01:55 20 BY MR. PETRONELLI:

21 Q. All right. Okay. I'm going to show you an
22 exhibit. These exhibits are going to be out of order,
23 just so the court reporter knows. I'm going to show you
24 a document that is being marked Exhibit 11.

01:56 25 (Exhibit 11 marked.)

1 as a result of that meeting with Mr. Byer?

2 A. Yes, sir.

3 Q. Okay. And did you write those notes by hand and
4 later type them up, or did you actually type them up as
01:57 5 you sat there in the meeting?

6 A. I later typed them up. I wrote them by hand.

7 Q. Did you keep copies of the handwritten notes?

8 A. No, I did not.

9 Q. Did anyone else take notes during that meeting?

01:58 10 A. No.

11 Q. Okay. And do you recall approximately how long
12 that meeting lasted?

13 A. At least an hour.

14 Q. Okay. And other than what you wrote down, do you
01:58 15 recall anything that you discussed in that meeting that
16 you remember not writing down?

17 A. No. I don't recall anything else.

18 Q. Okay. And after -- after this meeting with
19 Mr. Byer on June 8, 2023, you said that you -- after you
01:59 20 typed them up, you sent these notes on to Ryan Hallett,
21 the assistant city manager?

22 A. Yes.

23 Q. And other than sending him the notes, did you
24 have any conversations with Mr. Hallett with regard to
01:59 25 that meeting you had with Mr. Byer on June 8, 2023?

1 A. No, sir.

2 Q. Did -- do you recall him ever asking for more
3 information from you with regard to your meeting with
4 Mr. Byer?

01:59 5 A. No.

6 Q. Okay. So is it fair to say that after you sent
7 these notes from your meeting with Mr. Byer on June 8,
8 2023, to Mr. Ryan Hallett that you never heard anything
9 else again with regard to that -- the concerns that
02:00 10 Mr. Byer raised in that meeting?

11 A. Correct.

12 Q. And you're not aware of the City -- anyone in the
13 City investigating it; is that correct?

14 A. Correct.

02:00 15 Q. And you're not aware of whether Ryan Hallett did
16 any investigation with regard to Mr. Byer's concerns,
17 correct?

18 A. Correct.

19 Q. And you're not aware whether anyone at the police
02:00 20 department did any investigation, correct?

21 A. Correct.

22 Q. And -- and I think I already know the answer to
23 this, but I need to ask.

24 And you yourself, you didn't personally do any
02:00 25 investigation into the issues that Mr. Byer raised on

1 June 8, 2023, correct?

2 A. No.

3 Q. I'm sorry. Is that -- that's correct that you
4 did not do any investigation?

02:01 5 A. Oh. Sorry. No, I did not do any investigations.

6 Q. Okay. So based on your training in human
7 resources and your certification, did you have any
8 belief as to whether or not the concerns that Mr. Byer
9 raised with you in that meeting on June 8, 2023, should
02:01 10 be investigated?

11 A. I don't know if they should have been
12 investigated. I did have concerns with some of the
13 comments that he made, so I made sure that my boss knew
14 that there were concerns that Mr. Byer had.

02:02 15 Q. What were those comments that you believe that
16 you needed -- and I don't remember -- I can't recall
17 what you said.

18 You said some of the comments that you believed
19 should be reported to your manager? Is that what you
02:02 20 said?

21 A. Well, I think all of Mr. Byer's concerns needed
22 to be looked at, and if Ryan felt there was validity in
23 investigating, then he would have.

24 Q. Gotcha.

02:02 25 And were there -- what -- were there certain

1 (Exhibit 12 marked.)

2 BY MR. PETRONELLI:

3 Q. And let me know when you're able to see it.

4 Can you see it on your screen?

02:06 5 A. Yes, sir.

6 Q. And do you recognize this? Previously we -- I
7 asked you if you recall receiving an e-mail from
8 Mr. Byer after your in-person meeting where you took the
9 notes.

02:06 10 Does this document appear to be that e-mail?

11 A. Yeah. That looks familiar.

12 Q. Okay. And you never -- you never respond to --
13 responded to this e-mail that you recall, correct?

14 A. Not that I recall.

02:06 15 Q. And as you -- do you recall whether or not you
16 sent this e-mail that he sent you on June 28, 2023,
17 which is Exhibit 12, whether you ever sent this on to
18 Ryan Hallett?

19 A. I'm sure that I sent it to Ryan. I wouldn't have
02:07 20 kept it in just my possession.

21 Q. Okay. And do you recall if Mr. Hallett ever
22 responded to you about the contents of this e-mail?

23 A. No. I don't recall.

24 Q. And -- and after this e-mail was sent -- this was
02:07 25 sent on June 28, 2023. We previously looked at your

1 meeting that was on June 8th of 2023. So now after this
2 e-mail was sent 20 days after the meeting and -- do you
3 have any understanding as to whether or not the City did
4 anything after this e-mail was forwarded to Mr. Hallett
02:07 5 to investigate the concerns raised in this e-mail?

6 A. So I already responded that, yes, I gave this
7 information to Ryan, but I don't know if Ryan did any
8 follow-up after receiving the e-mail from me.

9 Q. Yes. So I think that you -- I previously asked
02:08 10 you whether or not you were aware of any -- the City --
11 anyone at the City did anything to investigate the
12 concerns raised by Mr. Byer on June 8, 2023. This
13 e-mail, I know it covers some things, but there's
14 also -- this is typed up by Mr. Byer. The notes were
02:08 15 typed up by yourself.

16 So I'm just asking whether or not you know -- I
17 know you previously answered about the things you put in
18 your handwritten notes. Now I'm asking, are you aware
19 of anything that anyone at the City did to investigate
02:08 20 the concerns raised in this e-mail dated June 28, 2023?

21 A. I'm sorry, Christian. I'm just not following
22 what your question is to this e-mail.

23 Q. Okay. Do you remember when I previously asked if
24 you -- if you were aware of the City investigating
02:09 25 anything that you had discussed with Ross on June 8,

1 2023?

2 A. Yes.

3 Q. So now I'm asking if you're aware if the City did
4 anything to investigate the things that Ross put in this
02:09 5 e-mail on June 28, 2023. Like, if there was, like --

6 A. Yes.

7 Q. Sorry. Go ahead.

8 A. I'm not -- I'm not aware of the City
9 investigating any of these matters either.

02:09 10 Q. Okay. And is it fair to say that as you sit here
11 today you don't recall if Ryan Hallett responded to this
12 e-mail that you believe you forwarded him; is that
13 correct?

14 A. Correct. I don't know if he responded to the
02:09 15 e-mail.

16 Q. Okay. Are you aware of whether or not
17 Mr. Hallett ever spoke with Mr. Byer?

18 A. I am not aware if they had a conversation.

19 Q. At any time.

02:10 20 A. Correct.

21 Q. Okay. Have you ever seen the La Palma police
22 officers policy manual?

23 A. No. I don't have a copy of that.

24 Q. Okay. And you've never -- you've never seen any
02:11 25 portion of it that you're aware of?

1 A. Correct.

2 Q. Okay. Other than that understanding, do you have
3 any other understanding as to what the policies or
4 procedures are of La Palma regarding when to investigate
02:31 5 employees' complaints about retaliation or
6 discrimination?

7 A. No. Those are -- those are processed by Ryan
8 Hallett and solely through Ryan Hallett.

9 Q. Okay. And you're not aware of anyone else at the
02:31 10 City who makes decisions about what complaints to
11 investigate and what complaints not to investigate?

12 A. No. I'm not aware of anybody else.

13 Q. Okay. I'm going to show you a document being
14 marked Exhibit 13. Same thing with the other exhibits.
02:32 15 If you can just take a look at it and let me know if you
16 recognize it.

17 And for purposes of identification, it's being
18 marks -- or it is marked Byer 0077.

19 And let me know when you're able to see it on
02:32 20 your screen, if you could.

21 (Exhibit 13 marked.)

22 BY MR. PETRONELLI:

23 Q. Do you see that document?

24 A. Yes.

02:32 25 Q. Okay. And it's blank at the top, and it's just a

1 short e-mail, two sentences. And it appears to be from
2 Ross Byer to yourself on October 25, 2023, and it's --
3 he's following up on the e-mail that he had previously
4 sent you.

02:32 5 Do you recall receiving this?

6 A. I don't recall receiving this.

7 Q. Do you -- and so is it fair to say that you don't
8 recall responding back to Mr. Byer in this e-mail?

9 A. I wouldn't have responded because I don't recall
02:33 10 receiving that e-mail from him.

11 Q. And is it -- is it -- is it also true that you
12 don't recall sending -- or forwarding this e-mail on to
13 Ryan Hallett or anyone else at La Palma?

14 A. Correct.

02:33 15 Q. In connection -- well, were you ever asked to
16 conduct a search of your e-mails to -- or strike that.

17 Did you ever conduct a search of your e-mails to
18 find correspondence with Mr. Byer after June 8th of
19 2023?

02:33 20 A. Yes.

21 Q. And you didn't find -- the e-mail we just looked
22 at you did not find in those e-mails?

23 A. That did not come up in the search.

24 Q. And what about any e-mails between yourself and
02:34 25 Ryan Hallett, did any of those e-mails come up?

1 objection to asking her for a legal conclusion or expert
2 conclusion or opinion.

3 MR. PETRONELLI: Sure.

4 BY MR. PETRONELLI:

03:13 5 Q. I'm just -- and, again, I'm not asking what the
6 law is on it. I'm just asking if you have an
7 understanding of if police officers are allowed to do
8 that. That's -- that's more my question.

9 So do you have an understanding as to whether or
03:13 10 not police officers are allowed to racially profiling --
11 profile citizens?

12 A. I have no idea.

13 Q. Okay. After -- so we just talked about the
14 racial profiling issue that Mr. Byer raised. I'm asking
03:14 15 now about I think what you referred to before, which was
16 his concerns that he raised in June of 2023 related to
17 what he perceived as discrimination in the police
18 department.

19 After -- do you have a recollection of that, his
03:14 20 concerns he raised with regard to discrimination?

21 A. Yes.

22 Q. Okay. And we talked about those several times
23 today. I'm not going to go back over them. But were --
24 after Mr. Byer -- or Officer Byer reported to you that
03:14 25 he believed there was discrimination happening within

1 the La Palma Police Department, did that cause you
2 concern?

3 A. Of course.

4 Q. And did you think that that was something that
03:15 5 should be investigated, his allegations of
6 discrimination?

7 A. I definitely believe we should look into it.

8 Q. But that wasn't your decision, correct?

9 A. That was not my decision.

03:15 10 Q. Okay. But had that been -- had you had the
11 authority to make that decision, it's something that you
12 believe should have been investigated?

13 MS. COHEN: Objection. Calls for speculation.

14 You can answer.

03:15 15 THE WITNESS: If I was of the authority to make
16 that type of decision, yes, I would look into it.

17 BY MR. PETRONELLI:

18 Q. And what is -- how would you look into it? Would
19 you talk to other officers in the department?

03:15 20 MS. COHEN: Objection. Calls for speculation.
21 Lack of foundation. Incomplete hypothetical.

22 MR. PETRONELLI: Strike that.

23 BY MR. PETRONELLI:

24 Q. Have you ever -- have you ever learned of a
03:15 25 situation where the City of La Palma has been sued for

1 Q. During the June 8, 2023, exit interview meeting
2 you had with Officer Byer, do you recall whether he told
3 you during that meeting why he was resigning?

4 A. I don't recall if he told me exact. I think
03:21 5 he -- I think what -- I think he just asked me if he
6 could meet with human resources, and then that's when we
7 met.

8 Q. And in that meeting you don't recall whether or
9 not Mr. Byer said that he was resigning because of what
03:21 10 he viewed as discrimination in the police department?

11 A. No. He had a -- he had that list of reasons that
12 were in my notes of why he was leaving the department.

13 Q. Okay. So it's your recollection that he was
14 leaving the department, resigning, because of all the
03:21 15 things that you guys went over and you documented in
16 your notes of that June 8, 2023, meeting, correct?

17 A. Yes, sir.

18 Q. Okay. Did you have any other understanding as to
19 why he was resigning from the La Palma Police
03:21 20 Department?

21 A. Those were my only reasons.

22 Q. Any -- the only reasons that you came to learn as
23 a result of your meeting with Mr. Byer?

24 A. Correct.

03:22 25 MR. PETRONELLI: Okay. I have nothing else.

CERTIFICATE OF REPORTER

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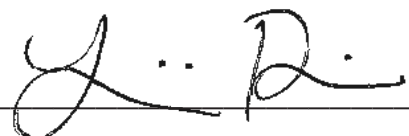
I, the undersigned, a Certified Shorthand Reporter, licensed by the State of California, being empowered to administer oaths and affirmations remotely pursuant to Section 2093(b) of the Code of Civil Procedure, do hereby certify:

That the foregoing proceedings were taken remotely before me at the time and place herein set forth; that any witness in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney or any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

DATED: March 31, 2025


Liliana Rodriguez, CSR No. 13783