
**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
)
Plaintiff,)
)
vs.) Case No. BC 718027
)
)
FREETOWN HOLDINGS COMPANY,)
a California Corporation; ABDUL)
JAMAL SHERIFF, an individual and)
DOES 1 through 50, inclusive,)
)
Defendants.)
)

**DEPOSITION OF
JEDD LEVIN**

DATE: June 10, 2019

REPORTER: Carol Mitchell

LOCATION: 3250 Wilshire Boulevard
Suite 1500
Los Angeles, California 90010



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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
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Plaintiffs,) CASE NO.
) BC718027
V.)
)
FREETOWN HOLDINGS COMPANY, a)
California Corporation; ABDUL)
JAMAL SHERIFF, an individual)
and DOES 1 through 50,)
inclusive,)
)
Defendants.)
)

DEPOSITION OF JEDD LEVIN

LOS ANGELES, CALIFORNIA

JUNE 10, 2019

1 Appearances

2 For the Plaintiff:

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-and-
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19
20 DEPOSITION OF JEDD LEVIN, taken at Emmanuel
Nwabuzor, APC, 3250 Wilshire Boulevard, Suite 1500,
22 Los Angeles, California on Monday, June 10, 2019, at
23 1:59 p.m. before Carol L. Mitchell, Certified
24 Shorthand Reporter, in and for the State of
25 California.

1	I N D E X
2	WITNESS: JEDD LEVIN
3	
4	EXAMINATION
5	By Mr. Nwabuzor
6	E X H I B I T S
7	(None marked for identification.)
8	INFORMATION REQUESTED:
9	(None.)
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LOS ANGELES, CALIFORNIA;
MONDAY, JUNE 10, 2019; 1:59 P.M.

JEDD LEVIN,

having been first duly sworn, testifies as follows:

EXAMINATION

BY MR. NWABUZOR:

Q Good afternoon, Officer.

A Good afternoon.

Q Okay. I don't think we've met before.

A No.

Q My name is Emmanuel Nwabuzor, and my office represents the Hollywood Liquor store and the owner. And as you are aware, there's a lawsuit involved abatement of nuisance. And that is what we are here to talk about here, to the extent that you are involved in the investigation.

Do you understand?

A Yes.

Q Okay. You've just been sworn to tell the truth. I believe that you have testified in court previously on several occasions; correct?

A Yes.

Q And have you been involved in any depositions, something similar to what we are doing here today?

A Yes.

1 Q Okay. On how many occasions?

2 A Maybe a handful. Not terribly many.

3 Q Say, under 10?

4 A Under 10, yes.

5 Q So, I am going to ask you, based on your
6 experience with those depositions, you know the
7 preliminary statement that we made we call it
8 admonition? You know, if it's okay, with the consent
9 of your counsel, if you can waive it or do you need me
10 to go through it?

11 MR. AGUILERA: We can -- we can waive.

12 BY MR. NWABUZOR:

13 Q Okay. Thank you, Officer.

14 MS. ROBERTSON: And before we begin, can we
15 just agree to the same stipulation where if
16 Mr. Aguilera objects to the form of the question, I'll
17 join -- the People will join in that objection.

18 MR. NWABUZOR: That's fair.

19 MS. ROBERTSON: So I don't have to repeat
20 myself.

21 MR. NWABUZOR: And so it can be faster. All
22 right.

23 BY MR. NWABUZOR:

24 Q I show that you have been an officer with the
25 LAPD for 22 years?

1 A Yes, sir.

2 Q Okay. And you are also assigned to work in
3 the Southwest Division; correct?

4 A Yes.

5 Q And part of your job assignment covers the
6 area of West Adam Boulevard and around Longwood
7 Avenue; correct?

8 A Yes.

9 Q Okay. Which is east of La Brea and Adams
10 Boulevard; correct?

11 A Yes.

12 Q Okay. And how long have you been so assigned
13 to work in the area?

14 A Um, I've been assigned to the Southwest
15 Division a little more than three years.

16 Q Okay. Did you know the former owners of
17 Holiday Liquor?

18 A No.

19 Q Did you know the -- the current owners of
20 Holiday Liquor?

21 A No.

22 Q Have you ever met with him?

23 A No.

24 Q Have you ever spoken to him?

25 A No.

1 Q Did you ever feel any need to meet with him?

2 A No.

3 Q Why is that?

4 MR. AGUILERA: Objection. Calls for
5 speculation. But you can answer.

6 THE WITNESS: Because I'm an undercover police
7 officer, and I don't typically introduce myself to the
8 public.

9 BY MR. NWABUZOR:

10 Q All right. So, is part of your assignment the
11 prevention of criminal activities?

12 A Yes.

13 Q Okay. And how do you do that if, for
14 instance, the owner of the store where the activity
15 occurs is not aware?

16 MR. AGUILERA: Objection. Vague, calls for
17 speculation. You can answer if you understand.

18 THE WITNESS: I don't. Can you rephrase the
19 question, please?

20 BY MR. NWABUZOR:

21 Q Okay. My question is this: If part of your
22 duty as an investigator is to prevent the commission
23 of crime -- correct -- how do you do that if, in this
24 instance, the owner of Holiday Liquor is not aware of
25 your activities in the area?

1 MR. AGUILERA: Same objections. You can
2 answer if you understand.

3 THE WITNESS: Well, I understand. But
4 prevention is one portion of what my duties and
5 responsibilities are. So, I can't predict crime, but
6 I do -- the majority is enforcement efforts.

7 BY MR. NWABUZOR:

8 Q Okay. You answered my question partially. Is
9 that -- the primary purpose of law enforcement is the
10 prevention of crime to the extent they are able to;
11 correct?

12 A It is one of them.

13 MS. ROBERTSON: Objection. Vague.

14 BY MR. NWABUZOR:

15 Q Sorry. Can you repeat your answer?

16 A I just said it is one of the -- the goals of
17 law enforcement.

18 Q Okay. Do you know Officer Ana Maria Mejia?

19 A Yes.

20 Q Have you ever discussed the issues at Holiday
21 Liquors with her?

22 A Yes.

23 Q Okay. Do you know the area that she covers?
24 By the way, Officer Mejia is the SLO for the area;
25 correct?

1 A Yes.

2 Q Was she a SLO during the time that you were
3 assigned to this part of the neighborhood?

4 A I mean, over the last -- I don't -- sometimes
5 the Senior Lead Officers change their areas, but I
6 know that at some point while I was assigned the
7 Southwest Division she was the Senior Lead Officer for
8 that area.

9 Q And where does that area cover?

10 A I don't know. Specifically, I don't know.

11 Q Okay. I show you here that based on your
12 background, you specialize in the area of
13 narcotics-related assignments, including possession
14 for sales and sales of narcotics; correct?

15 A Yes.

16 Q And also you -- you have experience in the
17 abatement of nuisance actions; correct?

18 A Yes.

19 Q Okay. How long have you had such experience?

20 A I was assigned to Detective Support and Vice
21 Division, working the Nuisance Abatement Unit, for
22 approximately two years.

23 Q Okay. Two years. Would that be from 2017 to
24 present?

25 A No. Presently, I work southwest narcotics and

1 have so for the last three years.

2 This was my assignment prior to my current
3 assignment.

4 Q Okay. So, when did the assignment in the
5 Western Boulevard involving Holiday Liquor terminate?

6 MS. ROBERTSON: Objection. Vague.

7 THE WITNESS: I'm not completely sure what
8 you're asking.

9 BY MR. NWABUZOR:

10 Q Are you still working as a narcotics officer
11 in the area where Holiday Liquor is located?

12 A Yes, I am.

13 Q Okay. I'm sorry. I talk very soft, and I
14 speak with an accent which is a double whammy,
15 especially because of her. She is the principal here.

16 You -- you stated that you are responsible for
17 formulating and implementing long-term nuisance
18 abatement strategies?

19 A I -- I -- that was my previous assignment.
20 It's not my current assignment.

21 Q Okay. But at least you are familiar with
22 that?

23 A Yes, I am.

24 Q Okay. And how -- what are your duties as far
25 as the abatement of nuisance is concerned?

1 MR. AGUILERA: At what point in time?

2 BY MR. NWABUZOR:

3 Q At the time that -- between the period of 2014
4 to 2018.

5 A Well, as far as my abatement duties,
6 specifically to abatement only applied when I was in
7 that assignment. I'm not currently in that
8 assignment.

9 Q Okay.

10 A So it was -- it was approximately four and
11 five years ago when I was in that assignment.

12 Q Okay.

13 A At which time my sole function was abatements.

14 Q What is your current function?

15 A I'm a narcotics detective, supervisor for the
16 narcotics enforcement detail at Southwest station.

17 Q Okay. Have you -- so you -- you have worked
18 on the abatement of other liquor stores?

19 A Yes.

20 Q Okay. What -- which was the last one you
21 worked on, if you recall?

22 A The -- I don't. I don't remember the specific
23 store.

24 Q Where was the last one -- the last time you
25 worked on abatement of liquor store?

1 A On a liquor store? Four or five years ago.

2 Q But you don't remember the one?

3 A No.

4 Q Did it involve a lawsuit, to your knowledge?

5 A I don't -- if it did, it -- I wasn't ever
6 called on it.

7 Q Okay. What typically would you require or
8 would you suggest to reduce criminal activities in --
9 nuisance in an area?

10 MR. AGUILERA: Objection. Calls for
11 speculation, vague. You can answer.

12 THE WITNESS: It would really -- I mean, each
13 location that I dealt with had a different set of
14 circumstances. And my abatements included liquor
15 stores, ABC locations, nightclubs, restaurants,
16 doughnut shops, massage parlors. So, it was a
17 different enforcement strategy with everything we did
18 because there was different problems with everything
19 we did.

20 So, you know, I would look at whatever the
21 individual location was, um, and after traditional
22 enforcement means have failed, then I would be
23 assigned to see if we could come up with other ways
24 to, you know, abate the problem of the location, the
25 nuisance activity.

1 So, it really just depended on what the major
2 nuisance-causing activity was at the location.

3 BY MR. NWABUZOR:

4 Q To your knowledge, did the traditional
5 enforcement strategies fail at the location of Holiday
6 Liquor?

7 A I don't know.

8 Q Okay. Would you typically require the
9 management of, say, the liquor store to take certain
10 measures to curb nuisance activity in the area?

11 MR. AGUILERA: Objection. Vague, calls for
12 speculation. But you can answer.

13 THE WITNESS: Are you referring to my current
14 assignment or when I was working nuisance abatement?

15 MR. NWABUZOR: When you were working nuisance
16 abatement.

17 MR. AGUILERA: Same objections.

18 THE WITNESS: At some point in time when I was
19 working abatements there, there was a meeting with
20 either the property owner and/or the business owner.

21 BY MR. NWABUZOR:

22 Q Okay. On this particular occasion, did you
23 ever have any meeting with the business owner?

24 MR. AGUILERA: Referring to Holiday Liquor?

25 MR. NWABUZOR: Holiday Liquor, yes.

1 THE WITNESS: No, sir. Because I'm not doing
2 abatement.

3 BY MR. NWABUZOR:

4 Q As a narcotics officers, do you also make
5 recommendation as to how a problematic store can be
6 corrected?

7 MR. AGUILERA: Objection. Vague. You can
8 answer.

9 THE WITNESS: Recommendations to who?

10 BY MR. NWABUZOR:

11 Q To either the owners, or to whomever, as to
12 how the criminal activity are alleged in the areas can
13 be reduced?

14 A No.

15 Q When you worked as an abatement officer,
16 right, in order to curb the nuisance activity, would
17 you recommend hiring state-licensed armed security
18 guard?

19 A That --

20 MR. AGUILERA: Objection. Calls for
21 speculation. You can answer.

22 THE WITNESS: That has been a recommendation
23 at certain locations in the past if I had felt that
24 that was one of the appropriate measures to take.

25 / / /

1 BY MR. NWABUZOR:

2 Q And what would be the purpose of that?

3 MR. AGUILERA: Let me just caution you,
4 Officer. The objection is it could possibly invade a
5 pending criminal investigation. You're more aware
6 than I. As long as you're not violating a privilege
7 of a current -- of an ongoing investigation or
8 something like that, you're free to answer.

9 THE WITNESS: Okay. And I'm only speaking of
10 prior investigations that have been resolved.

11 When I have recommended security guards in the
12 past, it -- for one, it has provided the presence of
13 an armed security guard or a security guard which a
14 lot of time deters folks that do nuisance activity
15 from even being in the area.

16 And additionally, you know, security officers
17 -- you know, paid, professional, licensed security
18 officers at the, you know, instruction of the property
19 owner or property business owner -- will actually help
20 people that are hanging in the area that shouldn't be
21 or doing illegal activity on the sidewalks.

22 You know, they'll shoe them away or sometimes
23 they're the person that actually will call the police
24 instead of the property owner because they were there
25 in realtime. Um, they're often a good conduit between

1 uniformed police officers and the business because,
2 you know, they usually know everything that's going
3 on. The uniformed officer is the person to kind of go
4 to.

5 BY MR. NWABUZOR:

6 Q And would you also recommend installing a
7 mental -- remotely-monitorable high-resolution
8 cameras?

9 A I have.

10 Q What is the purpose of that?

11 A Well, with the nuisance property, typically
12 there's crimes that occur. Um, and a lot of times
13 those crimes occur because there is no surveillance
14 cameras that could help aid in the arrest of the
15 person that commits a crime.

16 So, in essence, you -- persons will use or
17 pick certain areas to commit crimes because they know
18 that they're not being recorded or, if they are being
19 recorded, that it's not usable evidence.

20 Q And so, essentially, if it's a crime of
21 opportunity, there's no way of finding out who
22 committed the crime?

23 MR. AGUILERA: Objection. Vague. You can
24 answer.

25 THE WITNESS: I don't understand that

1 question.

2 BY MR. NWABUZOR:

3 Q So, the essence of the camera is to at least
4 act as a form of deterrence to a potential criminal
5 that they could be arrested by looking at the monitor
6 or finding out who committed that crime; correct?

7 A Yes.

8 Q And have you also requested or recommended the
9 sales of single-use alcohol to cease?

10 A Yes.

11 Q Okay. What is the purpose of that?

12 A Typically, locations that sell single-serve --
13 or you know, single cans, single cigarettes -- those
14 type of cheaper products -- tend to draw people
15 with -- with less, you know, money in their pocket.
16 And they just want a beer. They can't afford to buy a
17 six-pack of beer. And typically those folks will
18 purchase a single and drink it on the sidewalk, drink
19 it in the car, in the parking lot and not take it to
20 their residence to drink it in a legal fashion.

21 And it's just one -- it is a deterrent to keep
22 folks that are more likely to stay around the area to
23 not stay around the area.

24 Q So, it's a form of economic deterrence to
25 those people; correct?

1 MR. AGUILERA: Objection. Vague. You can
2 answer.

3 THE WITNESS: Partially.

4 BY MR. NWABUZOR:

5 Q Okay. And do you have any treasure as to the
6 amount that you would consider inexpensive for the
7 single-serving container of alcohol?

8 MR. AGUILERA: Objection. Vague.

9 THE WITNESS: No, I don't.

10 BY MR. NWABUZOR:

11 Q For instance, you are aware that some stores
12 sell single-service beer, like IPA's, I think that's
13 what they call them. Are those the type of things
14 that you try curb by --

15 MS. ROBERTSON: Objection. Vague.

16 BY MR. NWABUZOR:

17 Q You may answer.

18 A If -- if you're referring to like expensive
19 microbrewery-type of beers and single servings?

20 Q Yes.

21 A No. Single servings in themselves are not
22 something that I have ever deterred in itself. It's
23 only when it is accompanied by nuisance activity at a
24 location that I believe that that is one of the
25 contributors to it. I wouldn't go to -- you know, a

1 BevMo where there is no problems and ask them not to
2 sell single beers.

3 Q Okay. So, actually that is my understanding
4 is that other activities contribute to the
5 recommendation that a single-service alcohol not be
6 sold; correct?

7 For instance, if there is drug activity in the
8 area, prostitution in the area and homelessness in the
9 area, would those be factors that you consider?

10 MS. ROBERTSON: Objection. Vague and
11 compound.

12 THE WITNESS: I believe I understand what
13 you're asking. And what I'm actually saying -- and
14 maybe I didn't -- it came out backwards, the way I
15 said it --

16 MR. AGUILERA: Hold on. If -- if you're going
17 to provide an answer, then state first what you
18 understand the question to be.

19 THE WITNESS: I -- it sounds as though you're
20 asking me if those activities that you listed
21 contributed to the single service or single serving of
22 beers. Like, those folks are -- are there causing the
23 place to sell single beers. Is that what you're
24 asking?

25 / / /

1 BY MR. NWABUZOR:

2 Q Those -- folks tend to buy single-service
3 beer?

4 A Yeah. I would say that's accurate.

5 Q Okay. And would you also recommend changing
6 of hours of operation?

7 A Yes, I have.

8 Q Okay. And typically what would you recommend?

9 A Again, it really depended on what the specific
10 problem was for a location. If -- if -- for example,
11 when I was working some locations in Hollywood that
12 were either ABC locations or liquor stores, if
13 their -- majority of their nuisance activity occurred,
14 say, after midnight because people left nightclubs and
15 came to that place to get a beer or alcohol, and that
16 problem existed from like, say, midnight to 3 o'clock
17 in the morning, I would recommend that place close at
18 midnight so that they didn't -- the time they had
19 their nuisance activity, they wouldn't be open and,
20 therefore, the people wouldn't be there, gathering,
21 causing the activity.

22 Q Okay. And would you also recommend
23 improvement on the lighting in the area?

24 A Yes.

25 Q Okay. How about a removal of signage from

1 windows?

2 A Yes.

3 Q What type of signage would you recommend
4 removing?

5 A Um, it really depends on the storefront and
6 the amount of glass. But it's always the rule of
7 thumb that I would present to business owners that as
8 a police car drives by the location and they looked at
9 it, they should be able to see the activity that's
10 going on inside the location.

11 When it's completely covered with
12 advertisement and other posters and signs like that,
13 it doesn't afford an officer on the street to see
14 what's going on. And that is both protection for the
15 business of, say, they're being robbed, an officer
16 driving by wouldn't see that happening, and also it
17 would deter folks from conducting illegal activity
18 within it because most of the time, in my experience,
19 if officers drive by and can't see what's going on
20 inside, the person that is doing illegal activity or
21 nuisance activity could go inside so they can't be
22 seen from the street.

23 Q In essence, all this recommendation, from my
24 understanding of your testimony, is to protect the
25 business owners and also the community members in the

1 area; correct?

2 A No. Well, indirectly. The majority of what I
3 would recommend would be to end or curb nuisance
4 activity. Which, the result of the ending of the
5 nuisance activity would make it a better, safer
6 location for persons that live in the area and for the
7 business owner as well in the long run.

8 Q Okay. And the -- based on your experience
9 working around the west side neighborhood,
10 specifically with respect to Holiday Liquor, have you
11 had any problems with the signage on the windows?

12 MS. ROBERTSON: Objection. Vague.

13 THE WITNESS: I would say yes.

14 BY MR. NWABUZOR:

15 Q What problem have you had?

16 A Um --

17 MR. AGUILERA: Well, I'm going to caution you
18 not to divulge anything that may be the subject of an
19 ongoing criminal investigation.

20 THE WITNESS: Um, I have, in the past, had a
21 narcotics transaction occur within the store and I
22 could not see the activity because of signage in the
23 window.

24 BY MR. NWABUZOR:

25 Q What type of signage do you have in the window

1 that has prevented you from seeing what's going on
2 inside?

3 A It's typically advertisement for beers and --
4 and alcohol and different products. That type of
5 thing.

6 I can't -- I don't specifically know what's up
7 there at that time or was up there right now.

8 Q Okay. Has there, to your knowledge, been any
9 recommendation to the management of that store to
10 remove the signage that prevents law enforcement
11 officers from having a sense to what is transpiring
12 inside the store?

13 MR. AGUILERA: Objection. Calls for
14 speculation. You can answer.

15 THE WITNESS: I don't know. I don't know.
16 BY MR. NWABUZOR:

17 Q Who would know?

18 MR. AGUILERA: Objection. Calls for
19 speculation. You can answer.

20 THE WITNESS: I don't know.
21 BY MR. NWABUZOR:

22 Q The reason I'm asking is it is important for
23 your law enforcement purposes to have a sense of
24 investigation -- I just want to find out whether
25 anyone from the police department had requested the

1 removal of signage.

2 A I don't know.

3 Q Would that be something that you would
4 recommend to your senior officers?

5 MS. ROBERTSON: Objection. Vague.

6 THE WITNESS: Are you referring to the Senior
7 Lead Officers?

8 MR. NWABUZOR: Yes.

9 THE WITNESS: Um, honestly, if asked, I will
10 give them suggestions that have worked for me at, you
11 know, previous locations.

12 But I don't -- I don't go to -- I don't
13 specifically go to anybody to make recommendations
14 on -- on abatement type issues.

15 BY MR. NWABUZOR:

16 Q When was the last time you inspected Holiday
17 Liquor?

18 A Inspected?

19 MS. ROBERTSON: Vague.

20 BY MR. NWABUZOR:

21 Q I mean, by inspection, I mean surveillance.
22 I'm not asking you to disclose the type or purpose of
23 surveillance. But taking a look at, just to make sure
24 your testimony today is accurate as to the condition
25 of the store. So that's what I'm asking you.

1 A Okay. So, just so I understand, by
2 "inspection," you don't necessarily mean going in and
3 doing an --

4 Q No?

5 A -- alcohol beverage check where I'm looking
6 inside the store?

7 Q No. Because that's not your duty; right?

8 A That's right.

9 Q Yeah.

10 A If you're asking -- are you asking me the last
11 time I conducted the surveillance in the area around
12 the liquor store?

13 Q Correct.

14 A Um, last Thursday, I think.

15 Q Last Thursday. Okay. When you looked -- when
16 you did the surveillance last Thursday, did you see
17 any signage on the store?

18 A I don't recall.

19 Q Beginning from January of this year to the
20 present, have you seen any signage on this store?

21 A I did do -- I don't recall for sure.

22 Q Going back to January 2018 to December 2018,
23 have you seen any signage on this store?

24 A I don't recall.

25 Q Okay. So, you don't have any information as

1 to whether or not, in the past three years, there have
2 been signage issues as far as the law enforcement
3 activities are concerned?

4 MS. ROBERTSON: Objection.

5 MR. AGUILERA: Objection. Vague.

6 MS. ROBERTSON: And argumentative.

7 THE WITNESS: The only specific knowledge that
8 I have was my investigation where I was unable to see
9 inside due to whatever was in the window.

10 BY MR. NWABUZOR:

11 Q Are you sure they were -- what -- what was it
12 on the window?

13 A I don't know.

14 Q Can you refer to anything that you saw in the
15 window?

16 A No, I can't. I can only -- I can only say
17 that I have an obstructed view. Whether it was a
18 poster or a display on the inside that was backed
19 against the window, I really don't know. I just know
20 I wasn't able to see inside.

21 Q Would that particular obstruction be contained
22 in your report that contains any of your investigation
23 of the store?

24 A As to the specific item?

25 Q Correct.

1 A No.

2 Q Have you had any lighting issues with respect
3 to Holiday Liquor?

4 MR. AGUILERA: Objection. Vague.

5 THE WITNESS: I have not had any lighting
6 issues.

7 BY MR. NWABUZOR:

8 Q Okay. Do you know what the hours of operation
9 is now for Holiday Liquor?

10 A I do not.

11 Q Okay. What is your understanding as to the
12 hours of operation?

13 MR. AGUILERA: At what point in time?

14 BY MR. NWABUZOR:

15 Q Between January of 2019 to the present.

16 A I have -- I have no clue.

17 Q How about between January 2018 to December
18 2018?

19 A I -- no idea.

20 Q Do you have any information as to whether or
21 not, as of the present moment, Holiday Liquor sells
22 single serving containers of alcohol?

23 A I -- I -- I can't say with any kind of
24 certainty other than I've seen -- no, as far as
25 selling, I have no idea.

1 Q How about serving?

2 A What's that, sir.

3 Q To serve?

4 MR. AGUILERA: Objection. Vague.

5 THE WITNESS: I -- all I can testify to is
6 that I have seen persons on the property, and adjacent
7 to the property, drinking single beers. I don't know
8 where they got them.

9 BY MR. NWABUZOR:

10 Q Okay. Fair enough. And it's my understanding
11 that there is another liquor store which is east of
12 Holiday Liquor, it's called Longs Market.

13 Are you aware of that?

14 A I'm vaguely familiar with it.

15 Q Have you ever done any surveillance activities
16 around Longs Market?

17 A Um, I probably have, but it would have been
18 something where I've followed a car or moving
19 surveillance to that liquor store or somebody went
20 there to purchase and then moved on.

21 But as far as going there to that location to
22 look for narcotics activity, it's nothing I've ever
23 done.

24 Q So, you've never been assigned to monitor that
25 store?

1 A No.

2 Q Okay. And then, I'm also referring to there
3 is a store where alcohol is served at the intersection
4 of La Brea and Adams by the Chevron gas station?

5 A There is a Chevron gas station.

6 Q Yeah. Do you -- are you aware that alcohols
7 or liquors are sold in that store?

8 A I can't say I'm a hundred percent certain.

9 Q Have you ever seen homeless people in the area
10 drinking alcohol in open cans in that -- at that
11 particular location?

12 A No.

13 Q Okay. Do you have any information as to
14 whether or not Holiday Liquor and this management has
15 installed or maintained remotely-monitored
16 high-resolution cameras?

17 A Yes.

18 Q Do you have access to those cameras?

19 A Yes.

20 Q And that is in keeping with your
21 recommendation in abatement cases in other situations;
22 correct?

23 A Yes. But it's -- to be clear, I -- that has
24 nothing to do with me on this one. That's just --

25 Q No. I know. I'm just asking that -- you

1 know, you have a --

2 A It's in line with other recommendations that I
3 have made in the past with other abatement locations.

4 Q Fair enough. And are you aware that Holiday
5 Liquor and its management has hired state-licensed
6 security guard?

7 A I am not aware of that.

8 Q Okay. Have you, between January 2019 to the
9 present, seen any uniformed, armed security guard
10 around the premises of Holiday Liquor?

11 A In -- in -- I can't say specifically from
12 January of this year. But in the time -- in the three
13 years that I've conducted surveillance at the
14 location, I have -- I can say for certain I have on
15 one occasion seen an armed security guard.

16 Q Okay.

17 A Actually, let me rephrase that. A uniformed
18 security guard. I don't know whether or not he was
19 armed.

20 Q Okay. So, and I also want to be clear with
21 that. With respect to individuals that you have seen
22 consuming liquors or alcohol in the sidewalk in the
23 vicinity of Holiday Liquor, you cannot state today
24 that they are actually bought from Holiday Liquor?

25 A I can't say with certainty.

1 Q Okay. Do you have any information as to
2 whether the owners or management of Holiday Liquor are
3 aware of the narcotic activities within the area?

4 MR. AGUILERA: Objection. Vague, calls for
5 speculation. You can answer.

6 THE WITNESS: I have no idea.

7 BY MR. NWABUZOR:

8 Q Have you stated that Holiday Liquor has
9 developed a reputation in the community as a place
10 where illegal drugs are bought and sold?

11 A Yes.

12 Q What is the basis of that information?

13 A Um, well, prior to -- upon my arrival in
14 Southwest Division, a little over three years ago and
15 in joining the narcotics squad of that division, I
16 was, you know, told within the first week of multiple
17 locations throughout the division that are known
18 narcotics sales locations, and that the area around
19 Holiday Liquor was one of them. And since that time,
20 it's when we don't have directed enforcement
21 activity -- and by that, I mean we are just going out,
22 looking for things without a specific -- you know, go
23 to this house, go to this place. The area around
24 Holiday Liquor is a location we go to all the time and
25 see activity all the time.

1 Um, I have also been directed there or asked
2 to go there by the Senior Lead Officer for the area as
3 well as I receive -- I handle all the incoming citizen
4 complaints regarding narcotics activity for our
5 division. So, as I go through them, I have, over the
6 last three years, um, been directed to that area by
7 citizens.

8 Q Okay. And what do you mean that -- do you
9 mean that the liquors -- illegal drugs are bought and
10 sold inside the store? Or in the vicinity of the
11 area?

12 MS. ROBERTSON: Objection. Vague.

13 THE WITNESS: I don't understand the question.

14 BY MR. NWABUZOR:

15 Q When you said that illegal drugs are bought
16 and sold, are you referring to inside the store or
17 outside the store?

18 A Both.

19 Q Both. And to your knowledge, is the store
20 involved in the sale of the illegal drugs?

21 MS. ROBERTSON: Object.

22 MR. AGUILERA: Objection. Vague. You can
23 answer.

24 THE WITNESS: I -- I don't know.

25 / / /

1 BY MR. NWABUZOR:

2 Q Okay. Do you have any information to that
3 effect?

4 A I have never received information that the
5 owners of the business and/or the property were
6 actively involved in the sales of narcotics.

7 Q Okay. And to your information and based on
8 your knowledge, who are the people responsible for
9 these sales of the illegal drugs in the area?

10 MR. AGUILERA: And again, I'll just caution
11 you regarding any ongoing criminal --

12 BY MR. NWABUZOR:

13 Q I'm not asking you specifically for names.
14 I'm not asking you that.

15 Counsel, I want you to understand, I'm not
16 asking for the names, to the extent that they are
17 subject of ongoing criminal investigation. I'm aware
18 of some of the people that you people arrested and
19 prosecuted in the area. So those are of record.

20 So I'm asking you general information based on
21 your training, your experience and your knowledge of
22 the area, the people who are responsible for the
23 illegal sales of drugs?

24 MS. ROBERTSON: Vague as to "responsible."
25 / / /

1 BY MR. NWABUZOR:

2 Q Okay. You can answer.

3 A What I can try and do -- and hopefully this
4 answer the question. That I do understand your
5 question. But there's numerous ways in which
6 narcotics are sold at the street level.

7 The -- I can give you examples of the type of
8 narcotic sales activity I've seen at the location, and
9 that should answer your question. I've seen persons
10 that I believed to be narcotics users loitering in
11 front of the location or adjacent to the location.
12 Oftentimes, those persons will make a phone call or
13 just wait for -- for a narcotics dealer to arrive in a
14 vehicle. That person will arrive in a vehicle and
15 then there will be an exchange -- a narcotics
16 exchange, you know, usually at the window of the car.

17 I've seen the cars parked directly in front of
18 the liquor store. I've seen them parked next to the
19 liquor store. I've seen them park around the corner
20 on Longwood. The one thing that was consistent with
21 all those is the person was waiting for the narcotics,
22 were loitering around the liquor store prior to the
23 sale occurring.

24 I've also seen persons that we call "hooks,"
25 and those are typically narcotics users that will

1 facilitate a narcotics transaction. Um, so if a
2 person is looking to purchase narcotics will come up
3 to one of these hooks that is loitering in front of
4 the store and attempt to purchase narcotics, that
5 person will then facilitate the sale by either calling
6 or flagging down or going to a person that is a dealer
7 of narcotics. They'll get the narcotics, and then in
8 turn they will sell it or give it to the person that
9 originally asked. That person, even though they are a
10 hook, they are also committing the act of narcotics
11 sales.

12 Additionally, I have done undercover
13 investigations that involved the use of informants
14 that have been sent there specifically to that area by
15 myself and/or my team to purchase narcotics. And one
16 of my informants contacted a hook in front of the
17 location. The hook entered inside of the business and
18 purchased narcotics from a person that was inside of
19 the liquor store.

20 Q That is called controlled purchase; right?

21 A Well, if -- that type of investigation is
22 called a controlled buy.

23 Q Controlled buy. Okay.

24 So, would that typically happen at any store?

25 MR. AGUILERA: Objection. Calls for

1 speculation.

2 MS. ROBERTSON: And vague.

3 THE WITNESS: Yeah. I don't understand the
4 question.

5 BY MR. NWABUZOR:

6 Q Okay. The -- you said -- I'm using the
7 example that you have chosen about the hook. On
8 control buy, is that something that can happen at any
9 store?

10 MS. ROBERTSON: Objection. Vague.

11 THE WITNESS: It could.

12 BY MR. NWABUZOR:

13 Q And also, as far as the criminal nuisance
14 activities are concerned, they are not confined to the
15 front of Holiday Liquor; correct?

16 MS. ROBERTSON: Objection. Vague.

17 THE WITNESS: Confined? No, not confined.

18 BY MR. NWABUZOR:

19 Q You also have activities off Longwood and
20 Adams Boulevard; correct?

21 A There is activity that occurred there.

22 Q Okay. And there is activities at the corner
23 of La Brea and Adams Boulevard by the Chevron gas
24 station; correct?

25 A There are accurate -- there are narcotics

1 activities that occur at multiple locations throughout
2 the Southwest Division.

3 Q And in this situation that you describe, for
4 instance, in the controlled buy situation, what is the
5 owner of a business to do under the circumstances to
6 prevent something like that from happening?

7 MR. AGUILERA: Objection. Calls for
8 speculation and incomplete hypothetical. You can
9 answer.

10 THE WITNESS: Well, I mean, it -- it -- part
11 of it is all those suggested improvements to avoid it
12 occurring to begin with. Um, I would encourage a
13 business owner that if illegal activity was occurring
14 inside of their location, would be to call the police,
15 provide the police with the footage of -- the video
16 footage, if there is some, a description, make a crime
17 report and actually become an active participant in --
18 in deterring crime or making an arrest.

19 BY MR. NWABUZOR:

20 Q But, for instance, if they see one who is
21 trespassing, who is a known drug dealer, to call the
22 police; correct?

23 MS. ROBERTSON: Objection. Vague.

24 THE WITNESS: It -- it really depends on the
25 circumstance. I mean, if they -- if -- I wouldn't --

1 I would not necessarily tell someone to call the
2 police if they saw someone that they know in the past
3 has been a drug dealer. Um, I -- but if that person
4 was doing any kind of illegal activity, everything
5 from trespassing to sales of narcotics, yes, I would
6 say they should call the police.

7 BY MR. NWABUZOR:

8 Q And that would be based on the owner's or
9 employee's knowledge of the illegal activities;
10 correct?

11 MR. AGUILERA: Objection. Calls for
12 speculation. You can answer.

13 THE WITNESS: Like I said, it really -- it
14 depends.

15 I mean, you know, I don't expect a business
16 owner or a clerk to be aware of all the crimes that
17 exist on the face of the earth, um, to know and be
18 able to regularly identify and, you know, every time
19 crime that exists, but there are some -- some basic
20 things that I would expect most people to be familiar
21 with and be able to identify or at least it should
22 strike them as suspicious activity.

23 Additionally, there is a set of rules, you
24 know, with every ABC establishment in order to have a
25 license that kind of dictates certain things that may

1 not be a crime otherwise, but may be a violation of
2 that license. I've had a lot of liquor store owners
3 or ABC owners take on enforcement or notification of
4 police when persons are doing something that would
5 compromise their license or the condition of their
6 license.

7 BY MR. NWABUZOR:

8 Q Do you know personally if ABC has been
9 involved in investigation of a Holiday Liquor with
10 respect to the nuisance activities we mentioned?

11 A I have no idea.

12 Q Do you have any information as to whether or
13 not Holiday Liquor has failed any ABC test to be able
14 to keep their license?

15 A I have no idea.

16 Q So the citizens complain to you about the drug
17 activities in the area. Do they typically call you or
18 they call 911 on that channel to you?

19 A Honestly, the way I receive information, it
20 varies.

21 I mean, there's persons that call 911.
22 There's persons that call the non-emergency line.
23 There's persons that make an anonymous complaint to
24 narcotics division and, in turn, narcotics division
25 types up, basically, a form saying, hey, go

investigate this area. That will come to me.

There's Crime Stoppers which is an online -- anonymous way where people can go online and say, you know, whatever the criminal activity going on in an area.

There's persons that will tell their Senior Lead Officer, hey, they're selling drugs in the area. That Senior Lead Officer says, hey, can you go check that.

There's persons that call the City Attorney's Office, the District Attorney's Office, the Captain's Office, and the Chief of Police sometimes.

So, all those different means filter to me, and then we make a determination of what -- what and how we can investigate. So, I get them in all different forms.

Q Has the Councilman for District 10 --

A Councilman?

Q Yeah. For District 10, I think that's
Mr. Wesson.

MR. SHERIFF: Herb Wesson.

BY MR. NWABUZOR:

Q Has anyone from his office called you regarding drug activity in the area?

A I don't recall.

1 Q And to your knowledge, has Mr. Abdul Sheriff
2 -- I can represent to you, he's the owner of the store
3 -- has he reached out to the Southwest Division
4 regarding the drug activity in the area?

5 MR. AGUILERA: Objection. Calls for
6 speculation, no foundation. You can answer.

7 THE WITNESS: I can only state that he has
8 never -- I've never spoken with him.

9 BY MR. NWABUZOR:

10 Q Okay. But to your knowledge, you don't know
11 whether he has reached out to the Southwest Division?

12 A I have no idea.

13 Q And as far as the committee members are
14 concerned, when is the last time you received
15 information about drug activity in the area?

16 MR. AGUILERA: Objection. The committee
17 members?

18 BY MR. NWABUZOR:

19 Q Community members?

20 MR. AGUILERA: Community members.

21 MS. ROBERTSON: And objection. Vague.

22 THE WITNESS: I can't recall at this point.

23 BY MR. NWABUZOR:

24 Q Okay. Between January 2019 to the present,
25 has there been any changes in terms of the frequency

1 of drug activities in the vicinity of the business
2 Holiday Liquor?

3 MR. AGUILERA: Objection. Vague, calls for
4 speculation. You can answer.

5 THE WITNESS: Not in my observation.

6 BY MR. NWABUZOR:

7 Q Okay. Has the activity remained the same?
8 Gone down? Or gone up?

9 MR. AGUILERA: Same objections.

10 THE WITNESS: It appears to me to be the same
11 every time I've gone out there for the last three
12 years.

13 BY MR. NWABUZOR:

14 Q Okay. And the area you cover again, can you
15 give me the -- the area that you see the activities
16 going on?

17 I know you say that from the drug store all
18 the way to Longwood. And does that also include the
19 La Brea area?

20 MR. AGUILERA: Well, objection. I think it
21 misstates his testimony.

22 BY MR. NWABUZOR:

23 Q But you can -- strike that.

24 Can you tell me the area that your
25 investigation has shown you the drug activity have

1 remained the same?

2 MS. ROBERTSON: Objection. Vague.

3 THE WITNESS: Every investigation, almost
4 without exception, that I have done in that general
5 area, one or more of the persons involved have been
6 one time or another in front of the liquor store.

7 The majority of the activity and arrests that
8 I have made, if I've made an arrest that day, have
9 been between the liquor store and Longwood. I have
10 sometimes made it across the street. I have sometimes
11 followed somebody from the gas station. But the
12 majority of the enforcement activity has taken place
13 on that one block -- the half a block, actually.

14 BY MR. NWABUZOR:

15 Q And the half a block is between Longwood and
16 West View?

17 A No. In the front of the liquor store.

18 Q And how many arrests have you made between
19 January 2018 to the present?

20 MS. ROBERTSON: Vague.

21 MR. AGUILERA: Objection. Calls for
22 speculation. You can answer.

23 THE WITNESS: Arrests in total?

24 BY MR. NWABUZOR:

25 Q Yeah.

1 A For anything?

2 Q No. I would say with respect to your current
3 activities which is drug and narcotics enforcement;
4 correct?

5 A Yes. But you're asking me city-wide how many?

6 Q No, no, no. Within the area. We are talking
7 about liquor store -- Holiday Liquor and the vicinity.

8 A Okay. So -- so I understand your question,
9 you're asking me how many arrests my squad or myself
10 have made specifically tied to the area around Holiday
11 Liquor.

12 Q Holiday Liquor store, yeah.

13 MR. AGUILERA: For two years.

14 BY MR. NWABUZOR:

15 Q Yes.

16 A I'm -- I'm roughly estimating a dozen.

17 Q A dozen. How many have you made between
18 January 2019 to the present?

19 A Arrests?

20 Q Yes.

21 A It -- I just -- not all of my investigations
22 result in an immediate arrest. So, there's many times
23 where my investigation starts in that area, but then
24 we'll finish three weeks later in 77th Division.

25 Q Okay.

1 A And it may not make sense to you, but in the
2 course of how we do our investigations, that's
3 sometimes how it happens.

4 Q Okay.

5 A So to -- and I do understand your question,
6 but to go back and say specifically how many arrests
7 have been made in that half a block since January of
8 this year, um, I -- I don't know. I'd have to look at
9 my roster. I don't know offhand.

10 Q And have there been any arrests this year in
11 front of Holiday Liquor, to your knowledge?

12 A I don't -- I'm not sure. I don't believe
13 directly in front of the location, no.

14 MR. AGUILERA: That's for drugs, right, and
15 narcotics?

16 BY MR. NWABUZOR:

17 Q For drug -- the area -- the things that you
18 are assigned to.

19 A Okay.

20 Q To work on in the area. All right.

21 Other than drugs and narcotics, do you cover
22 any other vices in the area?

23 A Yes.

24 Q Like what?

25 A Um, whatever my captain wants me to document

1 as far as vice activity. Um, the vice unit handles
2 those things. Anything that falls under that -- which
3 would be prostitution, alcohol-related, that type of
4 thing -- we don't -- I will -- my squad does not do
5 that. But my captain will ask me to do robbery
6 enforcement. My captain will ask me to do fireworks
7 enforcement. So, I mean, where my main focus and my
8 main job task is narcotics investigations, I will
9 handle anything that is needed by -- if they need a
10 plainclothes unit, we'll do.

11 Q All right. Are you aware of the homelessness
12 issue in the area of Holiday Liquor between January
13 2019 to present?

14 MS. ROBERTSON: Objection. Vague.

15 MR. AGUILERA: Join.

16 MS. ROBERTSON: Sorry.

17 MR. AGUILERA: It's okay.

18 THE WITNESS: No.

19 BY MR. NWABUZOR:

20 Q To your knowledge, have you seen a lot of
21 homeless people loitering in the area of Western
22 Boulevard, between Holiday Liquor and La Brea, from
23 January 2019 to the present?

24 A I -- I can't really answer that question, sir,
25 because I can't make a determination whether somebody

1 is homeless based upon my observations. Unless, of
2 course, I saw tents or something that indicated that
3 person was living in that area. And if you're asking
4 me if someone -- if it appears people are living on
5 the street in that area, I would say no.

6 Q Okay. Have you seen people in tents around
7 the corner of La Brea and Adams between January 2019
8 to present?

9 A No.

10 Q Okay. Have you seen people in tents under the
11 10 freeway, which is north of La Brea and West Adams,
12 between January 2010 -- 2019 to present?

13 A Not to my recollection.

14 Q And have you seen people moving their carts
15 from La Brea Boulevard on Adams, going east of Adams,
16 between January 2019 'til present?

17 A What was the word? Carts?

18 Q Yeah. Carts, shopping carts.

19 A I can't say specifically.

20 Q Okay. Officer Levin, did anyone prevail on
21 you to file any document that will force the closure
22 of Holiday Liquor?

23 A I didn't -- I didn't understand the first word
24 you said.

25 Q Has anyone from either the community, the

1 police, the councilman's office, prevail on you to put
2 documents together that will force the closure of
3 Holiday Liquor?

4 A Oh, no.

5 Q Is it your intention to have Holiday Liquor
6 closed?

7 A Me, personally?

8 Q Yeah.

9 A No.

10 Q In your capacity as a police officer?

11 A No.

12 Q Now, do you think that people who loiter
13 around Holiday Liquor are homeless people?

14 MR. AGUILERA: Objection. Vague, calls for
15 speculation. You can answer.

16 THE WITNESS: Do I think the people that
17 loiter in front of there are homeless?

18 BY MR. NWABUZOR:

19 Q Yes.

20 A No.

21 Q Do you know if some of the people that loiter
22 there are homeless people?

23 A I don't know.

24 Q Okay. Do you know whether some of the people
25 that patronize the drug dealers there are homeless

1 people?

2 A I don't know.

3 Q Do you know whether some of the people that
4 sell drugs in the area -- and by "the area," I mean
5 the vicinity of Holiday Liquor all the way to La
6 Brea -- are homeless people?

7 A That -- that sell the narcotics?

8 Q Yes.

9 A I'm not aware of that.

10 Q Were you assigned to deal specifically with
11 the issue of homelessness within the area?

12 A Homelessness?

13 Q Yes, sir.

14 A No.

15 Q Have any of the community members,
16 neighborhood residents reached out to you on the
17 problems of homelessness within the area?

18 A No.

19 Q How about the problem of prostitution?

20 A No.

21 Q How about the problems of gang?

22 A No. But -- I want to make sure that you do
23 understand what my assignment is with narcotics.

24 If there is a gang or a prostitution problem
25 in the area and that is called in by somebody, it

1 would not come to me. So, I can't say whether the
2 gang unit has received information or the vice unit
3 has received information. But no one has come to the
4 narcotics unit complaining of these things.

5 MR. NWABUZOR: All right. So, what I'm going
6 to do is -- this will be quicker than the last one.
7 I'm going to review my notes, and then I'll come back
8 and wrap up my questioning.

9 So, take about 15-minutes break, 10, 15
10 minutes.

11 (Off the record.)

12 BY MR. NWABUZOR:

13 Q We are back on the record.

14 Officer, you're still under oath; correct?

15 A Yes, sir.

16 Q When you made arrest around the vicinity of
17 Holiday Liquor for drug users, generally the people
18 you arrested, were they homeless people?

19 MR. AGUILERA: Objection. Calls for
20 speculation. You can answer.

21 THE WITNESS: I don't -- I have no idea.

22 BY MR. NWABUZOR:

23 Q How about the drug sellers, the drug dealers?
24 Do you know if they were homeless people?

25 MR. AGUILERA: Same objection.

1 THE WITNESS: I can't say for certainty.

2 There's never been an indicator to me that any of the
3 folks involved in this are homeless.

4 BY MR. NWABUZOR:

5 Q Okay. And who -- there is a person by the
6 name of Detective Reyes. Do you know who that is?

7 MR. AGUILERA: How do you spell the last name?

8 BY MR. NWABUZOR:

9 Q R-e-y-e-s.

10 A I mean, I know several Reyeses in the
11 department, but not -- I don't know who specifically
12 that --

13 Q Who is the head of narcotics department,
14 Southwest Division?

15 A Had -- are you asking me who is?

16 Q Yes.

17 A Jesus Martinez. Jesus Martinez.

18 Q Are you aware of an arrest sometime in 2017
19 involving a drug dealer, goes by the street name Lala?

20 MR. AGUILERA: L-a-l-a?

21 MR. NWABUZOR: Yes.

22 THE WITNESS: I'm familiar with it, yes.

23 BY MR. NWABUZOR:

24 Q Okay. Do you know the person that provided
25 the information that led to the arrest of Lala?

1 A Not off the top of my head, I do not.

2 Q Do you know whether the owner of Holiday
3 Liquor, Mr. Sheriff, led to the arrest of drug dealer
4 Lala?

5 A I have no idea.

6 (Off the record.)

7 | BY MR. NWABUZOR:

8 Q Now, we talked about the video cameras before
9 as one of the measures that we have in deterring drug
10 activities. Now, do you know if there is a camera in
11 the vicinity of the church at the same Holiday Liquor?

12 A I -- I don't know if there's cameras at the
13 church.

14 Q And do you -- so you don't have access to the
15 camera that covers the church area, the intersection
16 of Longwood and -- and Adams Boulevard?

17 A The only cameras that I have access to are the
18 ones -- the Holiday Liquor cameras.

19 Q Okay.

20 A So, if one of those angles covers that
21 intersection, then it's possible.

22 But if you're asking me if I have access to,
23 like, church cameras or somebody else, I don't.

24 Q We have it on record that Mr. Sheriff provided
25 the church with video cameras to cover the area of the

1 church. I wanted to know if you were aware of that.

2 A I -- I have no idea.

3 Q And when you look at the camera that you have
4 access to from Holiday Liquor, does it go as far as
5 the intersection of La Brea and Adams Boulevard?

6 A No.

7 Q Okay. How far does it go, going westbound?

8 A Um, to the best of my recollection, there --
9 there's three exteriors that I have access to that, at
10 best, cover, in a westbound direction, maybe not as
11 far as the corner but just, kind of, a few feet past
12 the edge of the Holiday Liquor building, facing
13 westbound.

14 Q Have you -- has that been an issue in terms of
15 your law enforcement activities as to how far the
16 cameras can go?

17 A No.

18 MR. AGUILERA: Objection. Vague.

19 BY MR. NWABUZOR:

20 Q But you never requested for additional cameras
21 to be installed to enable your view, as far as you
22 can, westbound?

23 A No. I didn't. I've never.

24 Q How about going eastbound?

25 A No.

1 Q Okay. Now, were you requested by the People
2 to sign a declaration regarding your investigation
3 activities with respect to this case?

4 A By the People, you mean the City Attorney's
5 Office?

6 Q Yes.

7 A Yes.

8 Q And you signed it; correct?

9 A Yes.

10 Q With respect to the investigation in December
11 19, 2018 where you had a -- where you had an incident
12 involving a hook that made a drug purchase inside the
13 store, did you ultimately make an arrest?

14 A I believe so, but it wasn't at that day and
15 time or location.

16 Q Okay. So, who did you arrest? The hook or
17 the purchaser?

18 A No. We -- we arrested the seller, the dealer.
19 Not the hook or the purchaser.

20 Q Is that typically the target for you?

21 A Yes.

22 Q And was he prosecuted?

23 A I don't know.

24 Q To your recollection, did the dealer have an
25 address? The one you arrested?

1 A I believe so, I -- I'm not a hundred percent
2 because they kind of -- there's a lot of arrests and a
3 lot of search warrant services. I'm pretty sure that
4 investigation led to a search warrant service at a
5 residence, and then someone was arrested at a
6 residence.

7 Q Have you made any arrests around the vicinity
8 of Longs store?

9 A Of which store?

10 Q Long -- Long Supermarket? Is it Long?

11 MR. SHERIFF: Yes. Longs Market.

12 BY MR. NWABUZOR:

13 Q Longs Market?

14 A Oh, it is the one that's --

15 Q East?

16 A -- east of the location? Not to my
17 recollection.

18 Q Again, how about the store at the corner of La
19 Brea and Adams?

20 A By "store," are you referring to the gas
21 station?

22 Q The gas station; correct.

23 A Um, I don't recall any arrests made at that
24 gas station.

25 Q How about made arrests in the vicinity of

1 Longwood and Adams; correct?

2 A Yes.

3 MR. NWABUZOR: All right. I don't have any
4 other questions. I don't know if Mr. Aguilera has
5 any.

6 MR. AGUILERA: No questions.

7 MR. NWABUZOR: Or you?

8 MS. ROBERTSON: No questions.

9 MR. NWABUZOR: Okay. So we pretty much done.
10 Mr. Aguilera is going to explain to you -- I'm sure
11 you're familiar with that. So, we'll go with the same
12 stipulation as before. Is that agreeable to you?

13 MR. AGUILERA: Let me just ask him about
14 timing. We can go off the record for this.

15 (Off the record.)

16 MR. AGUILERA: So same stipulation?

17 MR. NWABUZOR: Have the same stipulation as
18 the last one.

19 So, thank you, Officer.

20 MS. ROBERTSON: So stipulated.

21 THE REPORTER: And copy order the same?

22 MR. AGUILERA: Yes. Same order.

23 MS. ROBERTSON: Same order.

24 (The following stipulation entered into
25 between counsel at the conclusion of Ana Maria Mejia's

1 deposition, taken June 10, 2019 is incorporated herein
2 as follows:

3 "MR. AGUILERA: Okay. So, what I would
4 propose is that the court reporter forward the
5 transcript to my office, to my attention, and I will
6 see to it that Officer Mejia has an opportunity to
7 review it. And then I will inform you of changes,
8 corrections, anything of that nature.

9 "So tell me your time limits.

10 "MR. NWABUZOR: I need it as quickly as
11 possible because we have to file responsive pleadings.
12 So, can you do that within a week of receipt?

13 "MR. AGUILERA: So, you're going to have it
14 expedited?

15 "MR. NWABUZOR: Yeah.

16 "MR. AGUILERA: So, when will we get this?

17 "THE REPORTER: This is the first I'm hearing
18 of this.

19 "MR. NWABUZOR: We'll need within a week.

20 "THE REPORTER: So, you'll have it within a
21 week.

22 "MR. AGUILERA: Okay. And then how long after
23 I get it are you asking for?

24 "MR. NWABUZOR: You can do it in a week;
25 right?

1 "MR. AGUILERA: So two weeks from today?

2 "MR. NWABUZOR: Yeah.

3 "MR. AGUILERA: Okay. So, if I get it a week
4 from today, are you going to be anywhere, Officer?

5 "THE WITNESS: No.

6 "MR. AGUILERA: Okay. We'll make sure she
7 gets it.

8 "MR. NWABUZOR: Do you think -- I don't know
9 how long it's going to take her to do it. It's my --
10 the pressure is on me.

11 "MR. AGUILERA: The court reporter is going to
12 get it to me in a week.

13 "MR. NWABUZOR: Okay.

14 "MR. AGUILERA: I will get it from Officer
15 Mejia, and we'll inform you in a week, the date I get
16 it, of any corrections and the fact of signature under
17 penalty of perjury; is that okay?

18 "MR. NWABUZOR: Sure. And you maintain
19 custody of --

20 "MR. AGUILERA: Of the original.

21 "MR. NWABUZOR: -- And produce the same at the
22 hearing --

23 "MR. AGUILERA: At the hearing.

24 "MR. NWABUZOR: -- or trial. And if the
25 original is not produced upon reasonable request, then

1 a certified, true copy of the original can be used for
2 all purposes in this case.

3 "MR. AGUILERA: So stipulated.

4 "MS. ROBERTSON: So stipulated.

5 "MR. NWABUZOR: Thank you."

6 (The deposition concluded at 3:21 p.m.)

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1 DECLARATION UNDER PENALTY OF PERJURY
23 I, JEDD LEVIN, do hereby certify under penalty
4 of perjury that I have read the foregoing transcript
5 of my deposition taken June 10, 2019; that I have made
6 such corrections on the errata sheet provided; that my
7 testimony as contained herein, as corrected, is true
8 and correct.9 DATED this _____ day of _____, 20_____ at
10 _____, California.
11
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1617 _____
18 JEDD LEVIN
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1 REPORTER'S CERTIFICATION
23 I, Carol L. Mitchell, CSR No. 12319 for the
4 State of California, do hereby certify:5 That the foregoing witness was by me duly
6 sworn; that the deposition was then taken before me at
7 the time and place herein set forth; that the
8 testimony and proceedings were reported
9 stenographically by me and later transcribed into
10 typewriting under my direction; that the foregoing is
11 a true record of the testimony and proceedings taken
12 at the time.13 IN WITNESS WHEREOF, I have subscribed my name
14 this 17th day of June, 2019.15
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20 CAROL L. MITCHELL, CSR NO. 12319
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