

## EXHIBIT [E31]

### TRANSCRIPT OF PLAINTIFF'S COMPLAINT TO LT. CRAWFORD OF THE IRVINE POLICE DEPARTMENT<sup>1</sup>

JUNE 15, 2022

[(0:02)] Lt. Crawford: Irvine Police. Lt. Crawford.

[(0:04)] Plaintiff: Hi, Lt. Crawford. This is Adam calling you back. Thank you for leaving a message.

[(0:09)] Lt. Crawford: Hi, Adam. How are you?

[(0:10)] Plaintiff: I'm well, thank you. How are you?

[(0:13)] Lt. Crawford: Good. How can I help you tonight?

[(0:15)] Plaintiff: So I'm calling with a bit of a peculiar situation. And I just want to give you some hypotheticals if I could before getting into all the messy details. But how would I go about filing a complaint for deprivation of constitutional rights by a public official?

[(0:36)] Lt. Crawford: Well, we certainly have a complaint process here at the police department. We accept the complaint, in any way, shape, or form that you'd like to make it. Some of the recommendations that I personally like to make for those that choose to file a complaint are to present what occurred in a written format.

We have a pamphlet which provides some information about complaints and also an area where you can write your own narrative about what you would like to highlight as your complaint. I also recommend that people choose to file a complaint sit down and perhaps type something out in a word document or just in a handwritten document. It seems to be the best way for us to accept those and really allow the person to explain what occurred.

[(1:25)] Plaintiff: Okay. So have you ever handled a complaint or do you know if there's a policy at Irvine for handling complaints for deprivation of rights by public officials?

[(1:37)] Lt. Crawford: We have a policy for handling complaints and that is basically that we all accept any complaints that anyone chooses to file. So your topic here might be a little bit unique but the fact that you want to file a complaint is not necessarily unique. We accept complaints all the time.

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<sup>1</sup> NOTE: All efforts have been made to ensure this transcript's accuracy. However, it was created by a third-party transcription company. It is not a verbatim transcript in that 'words' such as "um" and "uh", stuttering, and other 'abnormalities' inconsistent with written speech have been excluded. Because neither the transcriber nor Plaintiff's assistant (who reviewed the transcript for accuracy) were present during the call, there may be slight discrepancies. The actual audio recording should be relied upon for best evidence.

[(2:01)] Plaintiff: So now I'll give you a couple more details. Let's say that I want to make a complaint about both a criminal law violation and deprivation of constitutional rights violation by a judge that was acting on duty, so to speak. But without authority. And that this situation occurred in the courthouse of Santa Ana but when I went to make a complaint to the Santa Ana Police Department, they refused to even accept a complaint.

[(2:41)] Lt. Crawford: I think maybe what you're looking for is a report. And not so much a complaint. It sounds like you're making some allegations that may be a crime occurred, or an incident worthy of documentation may be occurred. A complaint that I'm discussing is a complaint that is about one of our officers or one of our professional staff members. Usually, these complaints come in when someone in the public isn't happy with the service that we provide them. And I'm hearing that maybe some allegations of a crime that may be occurred. Or an incident that you feel like you would like to have documented. Is that correct?

[(3:32)] Plaintiff: Yes. But there are some other nuances like I shared the jurisdictional issues that are going on there, that there are other agencies, like, let's say the city of Santa Ana, that has jurisdiction because the courthouse is in their city. But they are refusing to stop the crime that's being committed on me.

[(3:57)] Lt. Crawford: Well, I can't speak for the city of Santa Ana and their practices, and again I'm not entirely sure what the interaction you had with them entails, but as far as jurisdiction goes your best bet with the courthouse might actually be the Orange County Sheriff's Department.

[(4:17)] Plaintiff: I have the same situation with them.

[(4:20)] Lt. Crawford: Okay. And they refuse to hear your complaint?

[(4:26)] Plaintiff: They did. So I went to the court and I spoke with the sergeant and a deputy there and they both said, "We're not doing anything." So I called their Watch Commander and he said, "I'm scheduling a meeting for you to come to the headquarters. And we'll take a report." Well, they took a report but then they didn't fully, fairly, and impartially investigate it.

So, basically, this crime keeps going on. And they're refusing to protect me and my property from something that the state is doing unlawfully. And I will share with you that I'm a former police officer and Major Fraud and Forgery Investigator so I know exactly what a police...

[(5:17)] Lt. Crawford: What agency?

[(5:18)] Plaintiff: Huntington Beach.

[(5:20)] Lt. Crawford: Okay.

[(5:20)] So I know what a crime and investigation report looks like. So these people aren't doing it. I'm not talking about \$50 or even \$500. I'm talking about close to a million dollars judgment

that this judge did. And actually what's happened is after he did it to me, I found out that this has been a statewide crime spree, if you will, by these judges that's been going on for decades. And many people have been victimized by this and they've gone to the courts, and they've gone to the legislature to say, "Hey, stop. What you're doing is not lawful. And you need to make a change to this." And they're being shut down at every turn.

So what I did is that I went to all of the courts as well and I told them about the illegality of it. And they're refusing to make any changes and they just keep lying and covering it up. And I also went to my State Assemblywoman and senator and they both said that they would investigate it and they have stopped communicating with me.

So I've also, like I said, gone to Santa Ana and the Orange County Sheriff's Department. And I get it that investigating a judge is an anomaly. It's something different. But in my experience, the penal code, like if you just look up 484 which is the basic code for theft. It says whoever shall do any of these things, there is no discernment about whether it's a judge or not.

So my basic thing is that I think the minimum duty that an officer would have would be to take a report and do an investigation. And ultimately if the DA didn't file it, that's on the DA, that's not on the Police Department. These departments seem to be doing little bits and pieces of their duty, but it all seems like they're scared of investigating judges. And so they shut it down.

[(7:48)] Lt. Crawford: Okay. Well, I hear your frustration. I can tell you that this doesn't sound like it involves our jurisdiction, unfortunately. Being it in Santa Ana, and then also having a court system falls into Orange County's responsibility. It does sound like from what you're telling me, a report was taken and they have arranged for you to meet with them. I would maybe recommend seeing that through. And seeing what you learn from that meeting.

[(8:27)] Plaintiff: Oh, that's already happened. It's long gone. Yeah, that's what I'm saying.

[(8:30)] Lt. Crawford: Oh, I thought that was pending.

[(8:33)] Plaintiff: No. That's what I'm saying, is that we ultimately did meet and they took an information report but then didn't do any thorough investigation. And so it just got shut down before anything was really, truly looked into.

[(8:54)] Lt. Crawford: Maybe you should try the DA's office?

[(8:56)] Plaintiff: Yes, I actually did talk to them and they said go to your local Police Department. And have them make a report.

[(9:04)] Lt. Crawford: Okay. You live in our city, is that what I'm assuming...?

[(9:10)] Plaintiff: No, I'm calling you because I have called these other agencies that have ordinary jurisdiction there but they're not doing anything. They're not doing what they have a duty to do. And so, as I see it, and I know we may disagree upon this, the penal codes apply throughout the state and so do the constitutional protection. So I know, again, this is a unique

situation but I don't think that it's legitimate to say, "Hey, well, we're a neighboring city. Even though the other cities may or may not be in dereliction of their duty, we're not going to do anything."

The word exigent circumstances are coming to mind. Because there is an exception to this situation. I mean, it's not like I haven't gone to Santa Ana and the Sheriff's Department yet. I have. And I definitely would be willing to share all of the information that I have about what has transpired there and, you know, evidence that there has been an obvious dereliction of duty. Yeah, I'll leave it at that.

[(10:35)] Lt. Crawford: Okay. Yeah, I don't want to say that, I think what you said was that you're reporting it to us being that we're a neighboring agency, there's an expectation that we somehow intervene and thoroughly investigate this. Is that correct?

[(10:54)] Plaintiff: Yes. Given the fact that I'm making an allegation and I will give you the evidence of it that they are being derelict in their duty to fully, fairly, and impartially investigate both the criminal complaint and the deprivation of rights complaint. And also the fact that because the state has created this injury, they also now have a duty of care to intervene to stop the behavior from going on.

I mean, it's kind of like, this is not an apples-to-apples comparison, but it's gonna be pointing in the direction of what I'm talking about. Like let's say in the George Floyd incident, a judge saw what was going on and said, "Well, oh, sorry. This is the judicial department. I can't order those officers to do anything. They have to deal with it themselves." That's kind of like what I'm saying is going on here.

The executive has a duty to oversee that the law is faithfully executed. And so there is a supervisory responsibility inherent in the duty of the executive branch to make sure that if the judicial branch goes out of line and usurps its authority that there is a check and balance to that. And that's what I'm talking about here. Now the judicial branch has usurped its authority and they're harming me irreparably that the executive branch has to come in and stop the harm.

Because legitimately I can also show you the complaints that I've made to the legislature and other branches of the court, they're not doing anything. And so everybody that I've contacted is just, I don't know what they're doing but let's just say putting their head in the sand or pointing the finger at someone else.

[(12:56)] Lt. Crawford: Yeah, well I'm sorry that that's the feeling that you have. I just want to let you know though that the Irvine Police Department has no jurisdictional boundary over this. It sounds like you've started in the right direction at the Sheriff's Department. It sounds like the things that you're alleging are big. And you might want to consider getting a federal agency involved. But tonight, I don't have really, unfortunately, much to offer you.

[(13:26)] Plaintiff: Okay, so your determination is that even given the circumstances that I gave you, you would not do anything. Is that correct?

[(13:40)] Lt. Crawford: I'm not saying that I won't do anything. I just don't see at this point how the Irvine Police Department would get involved in this matter this time. Because it doesn't involve any of our jurisdictional issues or boundaries. And this is a very large thing that you're alleging, so I recommend you continue to contact the Sheriff's Department and Orange County District Attorney's Office. You've made some allegations about the state and things of that nature. You might want to consider a federal entity. Speak to them. But there's nothing here that I have to offer you, unfortunately, at the Irvine Police Department at this time.

[(14:27)] Plaintiff: Okay. Thank you so much.

[(14:29)] Lt. Crawford: Thank you. Have a good night. Bye-bye.

[(14:31)] Plaintiff: Okay. You, too. Bye-bye.

[END]