

**EXHIBIT A**  
**TO THE DECLARATION OF COURTNEY R. CHAVEZ IN SUPPORT OF**  
**DEFENDANT'S OPPOSITION TO GOVERNMENT'S MOTION TO ADMIT**  
**EVIDENCE**

FD-302 (Rev. 10-6-95)

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/18/2007

On 9/13/2007, Don Haidl was interviewed in Santa Ana, California by the below listed agents who were accompanied by Assistant United States Attorney Brett Sagel. Haidl was accompanied by his attorneys Cathrynne Dale and Mark Byrne. Later in the interview, attorney Dan Nixon arrived and upon his arrival, Byrne departed. Haidl provided the following information:

Haidl began the interview by mentioning that during his 8/13/2007 meeting with Mike Carona, Carona prayed silently before he ate.

Haidl was asked follow up questions regarding a previous statement he made involving a comment made by Carona in the presence of the Placer County Sheriff. Haidl said in 1999-2000, Grech, Carona, and Haidl flew to Sacramento to pick up California Governor Gray Davis, who was accompanied by the Placer County Sheriff. The purpose of the trip was to bring Davis back to Southern California for an event. At one point the party was outside Grech's airplane when Carona made the comment in question. Haidl said it was probable that the pilots of the airplane did not overhear this comment, but Grech may have overheard it.

Haidl was then asked questions regarding Los Angeles County Assistant Sheriff Larry Waldie. Haidl said he met Waldie in 1998, and recalled that Waldie was present at a Carona victory party at Haidl's home on 7/4/1998, but has not spoken to Waldie within the last six years. Haidl has never heard Waldie say anything about being involved with Thai children and Haidl was never present during a conversation in which Waldie bragged about having sex with Thai children. In fact, Waldie seemed to be a family man.

Haidl recalled that in approximately 1999 Waldie wanted a car to give to his daughter as a gift because she was going to college, and he was looking for a deal. Haidl volunteered to help Waldie and found an old Camaro that had a book value of zero. Haidl had a cheap set of tires put on the Camaro and had the car detailed at Nationwide, which cost him a total of approximately \$125.00. Ultimately Waldie's wife picked up the Camaro, which Haidl described as a good running car, safe, but simply had no value.

Investigation on 9/13/2007 at Santa Ana, California

File # [REDACTED] Date dictated \_\_\_\_\_  
 by SA Anthony D. Alston: ada  
SA Steve Berryman (IRS)

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Waldie asked Haidl many times if he could pay for the car, but Haidl told Waldie not to worry about paying, and refused to accept payment. Haidl said Cynthia Diaz knew about Haidl getting this car for Waldie as well.

George Jaramillo told Haidl that Waldie gave this car to an Asian person in a foreign country, but Haidl said he knew for a fact that the car went to Waldie's daughter. Jaramillo also told Haidl that Waldie had a girlfriend in a foreign country.

Haidl said that Waldie once advised him during the period of Greg Haidl's trial to get away from George Jaramillo and Carona. Haidl has no knowledge of Lee Baca or Waldie being involved in anything "shady." Haidl never gave cash to Waldie, or anyone else at Waldie's direction.

The only thing Haidl could recall that involved the LASD was an event that was well publicized involving a person named Zacky who owned Zacky Chicken. Zacky was a Level III Reserve for the Los Angeles Sheriff's Department and was involved in an incident in which he used his peace officer authority inappropriately.

Haidl was then asked follow-up questions regarding individuals paying money to receive OCSD Reserve badges. Haidl mentioned that he had people sign forms which said the badge they were receiving had nothing to do with a political contribution. Haidl said this was just to "cover his ass" because that was exactly what was going on, meaning badges were given in exchange for contributions. When asked for specific people who would verify the exchange of badges for contributions, Haidl suggested the agents contact Neil McAlister, who may be willing to speak with the agents, and to contact McAlister's associates.

Haidl said the person most vocal about giving badges for money was Dennis Assael. Haidl heard that Assael was once promising people OCSD badges in exchange for a \$1,000 contributions at the Big Canyon Country Club in Newport Beach, California. Haidl could not recall who told him this, but said it occurred well into Carona's term in office.

Haidl spoke to Assael a month ago "out of the blue." Assael told Haidl the two should get together and started bragging about closing the sale of his BMW dealership that day. Haidl said

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Assael is clearly a "spy" for Carona and Assael has spoken a couple of times to Peggy Haidl because he lives near her.

Haidl recalled that Assael brought a person into the OCSO Reserves named Tony Fanticola who owned a lot of Jiffy Lube stores. Apparently, Assael and Fanticola have since had a falling out. Haidl knows that Jaramillo bought cars from Assael but does not know about Carona getting anything of value from Assael.

The topic of the interview then turned toward reimbursed campaign contributions. Haidl said Armando Camarena was very involved in reimbursed campaign contributions and even reimbursed others. However, Haidl characterized Camarena as a liar and a thief. Haidl said Camarena has stolen from Haidl's company, Nationwide and has been fired. Haidl said Camarena has also committed bankruptcy fraud.

However, one person that was involved in reimbursed campaign contributions that Haidl said was credible is Dave Nelson. According to Haidl, Nelson has collected checks and reimbursed people with cash given to him by Haidl. Nelson was hired by Haidl in 1981 and lives in the Upland area of Southern California. Nelson is a PSR with the OCSO and the current boss at Nationwide is Greg O'Neil.

Haidl said the people he reimbursed for their contribution were the inner circle of people who got Carona elected as Sheriff and were referred to as "The friends list." Haidl had discussions with Carona and Jaramillo all the time about the roughly 86 people who were on the list. Haidl said it was discussed with Carona who on this list wanted an OCSO badge and who would get one for their support of Carona. Haidl said a portion of the people on this list were reimbursed for their contribution, but a portion of those on the list were not reimbursed. Haidl said a lot of the people on the list did so out of community service.

Haidl said there were many conversations regarding giving an OCSO badge for anyone who gave a \$1,000 contribution. Carona's goal was to get 1,000 reserves, and a \$1,000 contribution per badge. Haidl reasoned that even if only 200 of the 1,000 Reserves were wealthy, each one could get five more \$1,000 contributions to bring the total to one million dollars. With one million dollars, Carona wouldn't be defeated in the next election. This topic was discussed with Carona regularly, and Haidl recalled that often the first words out of Carona's mouth were "is it one of our guys?"

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Furthermore, Haidl discussed with Carona the fact that people whose contribution was reimbursed by Haidl would also be on "The friends list."

Haidl then described to the agents the benefits that he believed would come from being the OCSA Assistant Sheriff. First, Haidl said he was going to get a piece of the Ron Cedillos Jail project, which he has previously discussed. Second, Jaramillo and Carona were "wide open" in terms of their desire to make money. Likewise they were "wide open" in saying that if Haidl were Assistant Sheriff, he would "own" the OCSA. By "owning" the OCSA, Haidl would get a "get out of jail free card" to be used as he wanted. Haidl would also be able to have OCSA Deputies do as he said, and would be able to have people "cut loose" and not charged if they didn't want them to be charged. Haidl understood this to mean that he would have the power to arrest people that Haidl wanted arrested, and this was made clear to Haidl by Carona. Haidl recalled that Carona has said "Any cop can arrest a guilty guy, it takes a smart cop to arrest an innocent guy."

Haidl said nobody is going to write a ticket for an Assistant Sheriff. Haidl said even if you are "2.0" they'll just call your wife to take you home ("2.0" refers to blood alcohol level). Haidl also received an OCSA vehicle with emergency equipment, and he said there was a promise of State and National benefits.

When considering the Assistant Sheriff position, Carona talked about paying Haidl a salary, but Haidl did not want to be paid because he didn't want to be forced to punch a time clock.

Haidl was also motivated to be the Assistant Sheriff by the fact that he believed Carona and Jaramillo could go far in politics and would someday be in control of what Carona called the "State check book." Carona pitched the Assistant Sheriff position to Haidl by telling him he would be second in command of the fifth largest sheriff's department in the country.

Finally, after thinking about it, Haidl felt he may not have enough time to be Assistant Sheriff but Carona wanted Haidl to work two days per week and handle all the business deals which were to benefit Haidl, Jaramillo, and Carona, as well as handle the "rich" people they came in contact with. Haidl said Carona and Jaramillo thought money was going to be "falling from the trees" once they assumed office.

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Haidl recalled that he, Jaramillo, and Carona talked about not taking money while in office, but putting money in a trust or lobbying company and letting the money sit until they could legally take it out after leaving public office. They also talked about Carona getting out of politics for a while and making a huge million dollar salary for a period of time and then getting back into politics.

Once Greg Haidl got into trouble, Carona privately told Haidl they could use Carona's house as an operations center of sorts. Carona said he could carry messages back and forth to Tony Rackaukas (Orange County District Attorney). However, Haidl did not follow-up on Carona's offer because at this point in time he no longer trusted Carona.

Carona did agree that Greg Haidl couldn't go to jail, and Haidl recalled that Jaramillo asked Carona for permission to go talk to Rackaukas and ask him to take a personal look at the Greg Haidl matter and get the case down to juvenile charges or do something. Haidl said that Carona specifically gave Jaramillo permission to talk with Rackaukas, and in Haidl's mind, Carona and Jaramillo were making good on their "get out jail free" promise.

Haidl said that at the beginning of his term as Assistant Sheriff he wanted the job for 100% personal gain to make money. Later, after taking over the Reserve program, Haidl looked at it like he was doing the job for 50% personal gain or to make money and 50% he was doing something good for the community.

Haidl said that when Carona was involved in a discussion about illegal topics, he would say "that's a conversation for the boat" or "that's a conversation we should have at 40,000 feet." Haidl said this meant Carona wanted to be somewhere such as Haidl's boat or airplane where the telephone can't be tapped because he was concerned about the government monitoring his conversations.

Haidl was then asked questions relating to Joe Cavallo and said that he knew Cavallo was involved in bail bond referrals at the time it was occurring. Cavallo complained to Haidl that he had made a lot of money off bail bonds and no one knew his name until he became involved in the Greg Haidl case. Haidl said that Cavallo spoke of the bail bond matter with Jaramillo, but Haidl was never part of a conversation indicating Carona knew what Cavallo was doing with the bail bonds. Haidl said that bail bond referral

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money was never offered as part of a pay down of the loan Haidl made to Jaramillo Hoffman and Associates.

Haidl recalled an occasion when he called a bail bondsman named Ron to assist in posting bail for Greg Haidl the second time Greg needed to get bailed out of custody. Cavallo was upset with Haidl for not using some "Spanish kids" for the bail bond regarding Greg Haidl, and Haidl felt Cavallo was more upset about not getting the bail bond cut than he was concerned about getting Greg Haidl out of custody.

Haidl said he watched bail bond money coming into Cavallo's office and saw Cavallo put the money in a certain drawer. Haidl also recalled that Cavallo once made a comment that he didn't pay taxes on this money.

Haidl said there were a number of times Cavallo was on Ed Grech's boat with prostitutes with Carona and Grech. In fact, Carona himself mentioned the fact that women were on Grech's boat. Haidl said Cavallo has a list of the telephone numbers for prostitutes, but guessed that Grech was the one who got the prostitutes when they were on his boat. Haidl recalled a time when Cavallo was with a prostitute at the Balboa Bay Club, and also said that Cavallo would have prostitutes on his own boat.

According to Haidl, Cavallo would take settlements from clients and either not pay or send them a small check and Carona was aware of this.

Haidl recalled that in approximately 2002 there was a teenage party at Cavallo's home and an OCSA Deputy responded to a call at the party. Upon the Deputies arrival, Cavallo "got in the face" of the Deputy and was handcuffed. Cavallo had his wife, Liz, call Jaramillo and Cavallo was ultimately released. The next day both Jaramillo and Carona were joking about the incident. Haidl said Tom Davis was the Captain of the division in charge of the Deputy at the time.

Haidl also recalled that Cavallo was involved in two physical confrontations at Cavallo's office, in one of these confrontations the Irvine Police Department was called.

Haidl heard from Cavallo that Debbie Carona once called Cavallo about the child of a close friend of Debbie Carona's who was arrested. Apparently, Debbie Carona got the file of this

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child moved to another judge and Debbie Carona needed a lawyer to say he was the child's lawyer and that the judge was going to order the child to get counseling and be released to the OCS. Jaramillo then told Haidl that two Dignitary Protection Deputies went to pick up the child in a county car and brought the child back to Carona's office. Haidl said Cavallo would know the name of the judge involved in this incident. Cavallo told Haidl that this child was a bad kid and Cavallo was mad because he was never paid for his services.

Cavallo also claimed to Haidl that he gave Carona \$10,000 during Carona's first campaign. Haidl said Cavallo probably knew that Haidl was making reimbursed campaign contributions to Carona's campaign.

Haidl mentioned an Egyptian Mortgage Broker, whose name he could not recall, that went to Carona in an effort to press charges against Jaramillo, Lisa Jaramillo, and Cavallo for "hustling" him. This person was interviewed by Carona and told Carona that Cavallo, Jaramillo, and Tom Davis were in his office conspiring about "screwing" Carona.

Haidl recalled an incident which occurred at the Knowlwood's Restaurant during which Jaramillo came to Haidl and gave him a "veiled" threat by saying Cavallo needed more money to work the Greg Haidl case. Jaramillo told Haidl that Cavallo had one proffer session with the "Feds" and if Haidl gave Cavallo money, Cavallo will say there is an attorney-client privilege between he and Haidl. If Haidl did not give the money, Jaramillo said Cavallo would "burn" Haidl. On a separate occasion, Jaramillo told Haidl that Cavallo went to the "Feds" and embellished his story, and told Haidl that Cavallo was not Haidl's friend.

Out of concern that Jaramillo would "run his mouth off" about receiving money from Haidl, Haidl told Carona long ago that if anything came up regarding this subject, they would both claim they exchanged gifts. Haidl said the exchange of gifts idea was discussed "all the time" between Jaramillo, Haidl, and Carona. This is why Carona referred to exchanging gifts during the 8/13/2007 meeting between Haidl and Carona. Haidl said the fact of the matter was that Haidl only received from Carona a "knock-off" tie, a shirt, a table that he valued at \$50.00-\$100.00, and a gun which Haidl suspected Carona received as a gift.

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Carona often used the phrase "give me the win" in the context of people creating a situation where Carona would get the media credit or the "win." Haidl said Carona wanted the "win" on everything because he was an egomaniac and is also paranoid.

Haidl said he was a Level III Reserve at the San Bernardino County Sheriff's Department, and he based some of the ideas he employed at the OCSD PSR program on his experience in San Bernardino. However, Haidl said he did not want the OCSD program to be as "transparent" (referring to the giving of campaign contributions in exchange for a badge) as it was in San Bernardino.

Haidl was asked about the newspaper articles that appeared in May 1999. Haidl said he, Jaramillo, and Carona were on Haidl's boat the day the article came out, and they knew beforehand that it was going to be published. Haidl said that 99% of the article was wrong, but Haidl brought up the subject and explained it fully. Haidl said LASD Deputy Steven Gloyd paid a bounty hunter to shoot up a girlfriends house and it blew a case that Haidl had against a former employee named Bob Mohs, who Haidl claimed stole from him. Haidl said Gloyd basically extorted him before the article came out by telling Haidl he would talk to the newspapers. Haidl said he told Carona about the situation with Gloyd before it was publicized. Although everyone at the time was concerned about bad publicity, Carona did not want Haidl to leave the OCSD.

Haidl summarized the meeting he had with Carona on 8/13/2007 by saying Carona was trying to get Haidl to obstruct justice by telling lies and compare notes to tell these lies. Haidl described this conversation as a "rehearsal dinner." Haidl said that prior to this 8/13/2007 meeting Carona had gone over the "story" they should tell based on what they were hearing. These conversations took place after the federal investigation started, but before Haidl started having consensually recorded meetings with Carona.

Haidl believed that if Carona knew he was cooperating with the government that either he or a Haidl family member would be shot while resisting arrest or found with cocaine in his trunk. Haidl said Carona is that type of person.

Haidl mentioned that a person named Becky Finley who works at the Orange County Fair Board knows about what she and others were told to cover-up an Attorney General investigation at the Fair Board.

Exhibit A

J - 911

**EXHIBIT C**  
**TO THE DECLARATION OF COURTNEY R. CHAVEZ IN SUPPORT OF**  
**DEFENDANT'S OPPOSITION TO GOVERNMENT'S MOTION TO ADMIT**  
**EVIDENCE**

*File copy*

**STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
CALIFORNIA BUREAU OF INVESTIGATION  
9425 Chesapeake Drive  
San Diego, CA. 92123**

**INVESTIGATION REPORT**

<b>Investigation Title:</b> Michael Carona		<b>Investigation Number:</b> [REDACTED]	<b>Case X-Ref:</b>
<b>Investigation Requested by:</b> Senior Assistant Attorney General Gary Schons		<b>Type of Report:</b> Interview	
<b>Case Agent:</b> Barbara Shakowski	<b>Reporting Agent:</b> Barbara Shakowski		<b>Report Number:</b> Fifteen (15)
<b>Type of Crime:</b> 3060 Government Code - Removal from Office		<b>Supervisor:</b> Richard Negrete	<b>Date:</b> April 17, 2006

**SYNOPSIS:**

On April 18, 2006, at 1105 hours, Senior Assistant Attorney General (SAAG) Gary Schons and I, Special Agent (SA) Barbara Shakowski, California Bureau of Investigation, San Diego Regional Office, Investigative Support Team (CBI/SDRO/IST), met with Sandra TRUJILLO [REDACTED] and her attorney, Randy Renick, at Tommy's Restaurant, [REDACTED] California. The purpose of our meeting was to interview Ms. TRUJILLO regarding the sexual harassment complaint she filed against Orange County Sheriff Michael Carona.

**DETAILS:**

Sandra TRUJILLO began working for the Orange County Sheriff's Department in 1997. She left the Department for a period of time and returned in 1999 when she was hired as an Office Technician in the Personnel/Recruiting Division. She worked there for three months and then applied for a Secretary III position with the Department in June or July of 1999. During the oral interview for the position, George JARAMILLO and Human Resource Director, Karen KIDDY, were on the interview panel, however, Ms. TRUJILLO did not know either of them at the time.

She recalled it was later that day, Mr. JARAMILLO requested to speak to Ms. TRUJILLO and she met with him for about an hour. Mr. JARAMILLO offered Ms. TRUJILLO the position as his secretary and talked about his expectations, how he came on board the Department with Sheriff Carona and about Mr. JARAMILLO'S law firm. He explained that he and Sheriff Carona, whom she also met that day, were like brothers and that as his secretary, she should be loyal to three people: Assistant Sheriff Don Haidl, Sheriff Carona and himself. It was Ms. TRUJILLO'S understanding that he was implying it was not necessary to have that same loyalty to the other

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Exhibit C

Michael Carona

Assistant Sheriffs, Douglas Storm, Tim Simon and John "Rocky" Hewitt. Ms. TRUJILLO began her new position in August or September of 1999.

According to Ms. TRUJILLO, Mr. JARAMILLO sexually harassed her. Mr. JARAMILLO would often call her into his office and close the door. (She noted none of the other Assistant Sheriffs did that with the other administrative secretaries and it made her feel uncomfortable.) Once she was in his office, Mr. JARAMILLO would boast about himself, women and the election that Sheriff Carona won. She said he would "hit on her" and show her photographs of women who were nude or wearing very little clothing. Ms. TRUJILLO later learned the identities of the other women in the photographs to be Lisa JARAMILLO, Erica HILL, Debbie WEATROWSKI and Nadia (an employee of the Orange County District Attorney's Office). Ms. TRUJILLO observed that Erica HILL would visit Mr. JARAMILLO weekly and Mr. JARAMILLO would ask Ms. TRUJILLO if she wanted to have a "threesome" with him and Ms. HILL.

Mr. JARAMILLO also talked about a secretary named Brandy and how "hot" he thought she was. Ms. TRUJILLO said he was "flirty" with Brandy and she recalled a time when Mr. JARAMILLO actually played a tape recording in her presence of a voice mail left by a female who called Mr. JARAMILLO, "Tiger." According to Mr. JARAMILLO, the voice was that of Brandy and he told Ms. TRUJILLO he was "going out with her." Ms. TRUJILLO believes Mr. JARAMILLO also played the recording for Tim Simon. Additionally, Mr. JARAMILLO told her about an 18-year-old female named Joanna and how he would like to "get her in bed."

Ms. TRUJILLO stated Mr. JARAMILLO also touched her inappropriately. She explained when she first began working in the administrative office, both Sheriff Carona and Mr. JARAMILLO routinely hugged her. She did not complain because she thought it was just the way they acted. However, Mr. JARAMILLO began to touch her inappropriately by sticking his finger inside her shirt if she was wearing a blouse or putting his hand up her skirt. On one occasion, he bent her over his desk and rubbed up against her. She responded by slapping him and leaving his office. Afterwards he called her and said something similar to, "Oh you're not going to get mad at me, are you?"

Based on the way Mr. JARAMILLO treated Ms. TRUJILLO, she gravitated towards Assistant Sheriff Tim Simon and Rocky Hewitt because she saw how differently they treated the secretaries. Ms. TRUJILLO would confide in Mr. Simon about the way Mr. JARAMILLO treated her and how uncomfortable it made her. In response to their conversations, Mr. Simon said he would talk to Mr. JARAMILLO. He later told Ms. TRUJILLO he advised Mr. JARAMILLO he could not treat her that way. Ms. TRUJILLO also spoke to Rocky Hewitt about Mr. JARAMILLO'S behavior. Mr. Hewitt told her he was sorry the behavior was taking place and that he did not understand Mr. JARAMILLO.

Ultimately, Ms. TRUJILLO spoke to Sheriff Carona about Mr. JARAMILLO'S behavior, the photographs he had shown her, and the fact Ms. TRUJILLO believed Mr. JARAMILLO was sleeping with Erica HILL. Sheriff Carona told her Mr. JARAMILLO was a "sociopath" and said he would talk to him about his behavior.

In August or September of 2000, an anonymous letter was sent to the Personnel Department about Mr. JARAMILLO'S conduct, specifically addressing how he was mistreating Ms. TRUJILLO. Mr. JARAMILLO approached Ms. TRUJILLO and asked her if she wrote the letter, an allegation she

**Michael Carona**

denied. Mr. JARAMILLO told her she needed to "make the letter go away" and advised her she would be getting a call from Human Resources. He told her to tell him when she did.

Ms. TRUJILLO said she received a telephone call from the Captain of Personnel, Tom Twellman, who is a friend of Sheriff Carona. He asked her how she was and told her he and Karen KIDDY would like to take her out to lunch. They subsequently met for lunch at a Chinese restaurant in Santa Ana. Mr. Twellman and Ms. KIDDY told her about the anonymous letter they received discussing the allegations of sexual harassment by Mr. JARAMILLO involving her. Ms. TRUJILLO broke down crying and admitted the information contained in the letter was true (i.e. the sexual pictures, closed door meetings etc.) They told Ms. TRUJILLO in order to investigate the matter, she would need to file a formal complaint herself since the letter had been sent anonymously. Ms. TRUJILLO said she would need time to think about it, since she felt doing so could affect a lot of people.

During this time, Mr. JARAMILLO repeatedly asked Ms. TRUJILLO if Human Resources had contacted her. Although she had already met with Human Resources, she denied ever being contacted. She and Mr. JARAMILLO had ongoing conversations about the matter during which Mr. JARAMILLO offered her a raise, a company car and also told her what to say to "make it go away." Their conversations then shifted to Mr. JARAMILLO threatening to ruin her career if she didn't "make it go away." At one point, Mr. JARAMILLO disclosed he already knew about the meeting and confronted her about why she did not tell him she had already met with them. Ms. TRUJILLO felt Mr. JARAMILLO then began making her job difficult. He began tracking her time, he would dictate when she could take lunch (according to his meeting schedule), would talk about her at meetings and would intentionally not sign documents she gave him.

Approximately two to four weeks after Ms. TRUJILLO became aware of the anonymous letter regarding Mr. JARAMILLO sexually harassing her, she spoke to Sheriff Carona about the letter and Mr. JARAMILLO'S behavior. Sheriff Carona asked her if the activity outlined in the letter was occurring and Ms. TRUJILLO told him it was, adding she just wanted it to go away. Sheriff Carona responded by saying "Fucking George," and he asked Ms. TRUJILLO to give him time to figure out what was going on and to get back to her.

Sometime later, Ms. TRUJILLO had a second meeting with Sheriff Carona regarding the matter. Prior to the second meeting, Ms. TRUJILLO was disturbed to learn from Mr. JARAMILLO that he knew about her first meeting with the Sheriff. During the second meeting, Sheriff Carona informed her Tom Twellman and Karen KIDDY were going to contact her again in order to conduct a recorded interview regarding the sexual harassment allegations. Sheriff Carona told her the only way she could "make this go away" was to "say it didn't happen." Ms. TRUJILLO felt Sheriff Carona was telling her that if she lied and denied the allegations of sexual harassment by Mr. JARAMILLO, the Sheriff would protect her by making the activity stop.

Shortly thereafter, Human Resources contacted Ms. TRUJILLO again and they conducted a recorded interview with her. Ms. TRUJILLO denied the allegations because she was concerned that Tom Twellman, Sheriff Carona and Mr. JARAMILLO were all aware of the information she had previously provided regarding the sexual harassment. It was Ms. TRUJILLO'S belief that both Tom Twellman and Karen KIDDY knew she was not being truthful when she denied the allegations because at the conclusion of the interview, they told her she was brave and provided her with brochures and documents regarding sexual harassment.

**Michael Carona**

After the interview, Ms. TRUJILLO continued to work as Mr. JARAMILLO'S secretary for another year. Mr. JARAMILLO did not have anymore closed door meetings with her, touch her or make any advances again. He did, however, continue to show her sexual photographs. On one occasion, Ms. TRUJILLO removed five or six of the photographs from Mr. JARAMILLO'S briefcase and photocopied them. The photographs were of Erica HILL and Debbie WEATROWSKI. Ms. TRUJILLO said the photocopies were subsequently turned over to the Orange County District Attorney's Office.

When asked about her relationship with Sheriff Carona, Ms. TRUJILLO disclosed they had a sexual relationship, which began in the beginning of 2000, when she first met with the Sheriff to tell him about the problems she was having with Mr. JARAMILLO, (before the anonymous letter regarding Mr. JARAMILLO'S harassment of Ms. TRUJILLO was sent to the Department). The Sheriff's response was "friendly" and included him making advances toward her. According to Ms. TRUJILLO, during that meeting, Sheriff Carona kissed her. Ms. TRUJILLO said she did not know what to do or how to respond to his advances. The second time the Sheriff made advances towards Ms. TRUJILLO was when she went into his office on a business matter, filling in for the Sheriff's secretary, Elaine VASQUEZ. They kissed and the Sheriff placed his hand on her buttocks and led her into his private restroom where they had sex.

Ultimately, Ms. TRUJILLO and the Sheriff had sex on numerous occasions. She estimated they had sex approximately ten times over the course of a year. She recalled having sex in the restroom of his office, in her car at the fair, in his car, and at his house when she dropped off work for him. On one occasion, she met Sheriff Carona in San Francisco while he was there for a conference. She recalled flying up and arriving in the evening. Although he had previously told her she could get her own room, she spent the night in the Sheriff's room at the Argent Hotel and then left the next morning. [The Sheriff's calendar showed that he stayed at the Argent Hotel in San Francisco in connection with a meeting at the administrative office of the courts on the night of Tuesday, June 12, 2001.] Ms. TRUJILLO also recalled meeting with Sheriff Carona in Palm Springs, when he was at a Chief of Police Association conference. [The Sheriff's calendar showed he was in Palm Springs at the Hyatt Regency Hotel April 25-26, 2001, for a Chief's workshop.]

According to Ms. TRUJILLO, there is speculation that a recording exists of dialogue between Ms. TRUJILLO and Sheriff Carona while they were alone in a vehicle. During a trip to San Francisco for the Project 999 bike ride for the Police Officers Memorial, Ms. TRUJILLO volunteered to support officers participating in the ride. [The Sheriff's calendar shows this trip occurred on Friday, May 4, 2001.] While in San Francisco, Ms. TRUJILLO and other volunteers met with Sheriff Carona and his wife, and Mr. JARAMILLO and his wife for dinner. Afterwards, Mrs. CARONA rode with Mr. JARAMILLO and Ms. TRUJILLO rode with Sheriff Carona in his car. The two vehicles got separated and Sheriff Carona and Mr. JARAMILLO were on the telephone with each other to try to locate one another. After their telephone conversation concluded and the Sheriff believed his phone had hung up, he began making advances towards Ms. TRUJILLO. Ms. TRUJILLO later learned from Mr. JARAMILLO that his phone was still on at the time and it recorded the interaction between Sheriff Carona and Ms. TRUJILLO. Although she has not verified the recording exists, if it is true, Mr. JARAMILLO has possession of it.

According to Ms. TRUJILLO, although the sex between she and the Sheriff was consensual, she had concerns about her job if she had told him "no." The Sheriff always presented opportunities for them to be together with a work angle and as a chance for them to talk about Mr. JARAMILLO. The sexual conduct ended (with the exception of one encounter at Mr. Stocks Restaurant) after Ms.

Michael Carona

05-70163-01

TRUJILLO tested for the position of Senior Office Supervisor and accepted a promotion in January 2002, relocating her to the [REDACTED] at the [REDACTED] station.

**REDACTED**

[REDACTED]

Ms. TRUJILLO was also aware of a long-term sexual relationship between Sheriff Carona and Debra HOFFMAN. Ms. TRUJILLO recalls seeing Ms. HOFFMAN visit the Sheriff at his office on a regular basis and learned that Mrs. CARONA caught the two of them having sex at rented office in the city of Orange, "off 17<sup>th</sup> Street," near Master Yee's martial arts studio. (Ms. TRUJILLO believed the office may have been rented by the campaign, the Michael Carona foundation or by Sheriff Carona's friend, Deputy Bud Hood.) According to Ms. TRUJILLO, Sheriff Carona's secretary, Elaine VASQUEZ, called Mrs. CARONA and told her where to find the Sheriff and Ms. HOFFMAN. Mrs. CARONA went to the rented office space and "caught" the two of them. Ms. TRUJILLO said Elaine VASQUEZ told her the Sheriff and Ms. HOFFMAN were having an affair and Ms. VASQUEZ showed Ms. TRUJILLO a photograph Ms. VASQUEZ had taken from Sheriff Carona's office, which depicted Ms. HOFFMAN in a provocative pose.

When asked if she still spoke to Sheriff Carona or Mr. JARAMILLO, Ms. TRUJILLO said she has not talked to Mr. JARAMILLO in years. She did continue to talk to Sheriff Carona after she was promoted until May 2005. Ms. TRUJILLO explained that when the grand jury proceedings were taking place regarding Mr. JARAMILLO, she knew she was going to be interviewed by the District Attorney's Office. Sheriff Carona "coached" her and told her they were going to ask her about her knowledge of Charlie GABBARD, Mr. JARAMILLO and Mr. GABBARD'S company, CHG Safety Technology. Ms. TRUJILLO said while she was still working for Mr. JARAMILLO, a fax came in for Mr. JARAMILLO. The fax was a copy of the contract between Charlie GABBARD and Mr. JARAMILLO and outlined the fees he would be paid and the percentages he would receive over the years. Ms. TRUJILLO provided the Sheriff with a copy of the faxed contract because she was not sure if he knew about it and she was concerned the arrangement was a conflict of interest. Sheriff Carona said he would talk to Mr. JARAMILLO about it.

On January 19, 2005, during a subsequent telephone conversation with the Sheriff, Ms. TRUJILLO asked him how she should respond if the District Attorney asked her about her sexual relationship with him. Sheriff Carona told her to deny anything about their relationship. Sheriff Carona said, "Unless they have an 8 x 10, it never happened" and to "lie, lie and deny." Ms. TRUJILLO specifically recalled the date that conversation took place because it was the evening of employee, Linda SPREINE'S, retirement celebration and the call took place from Sheriff Carona's cell phone [REDACTED] to Ms. TRUJILLO'S cell phone, [REDACTED] [The Sheriff's calendar shows Linda SPREINE'S retirement at the Aliso Viejo Golf Club at 5:00 p.m. on January 19, 2005.]

**REDACTED**

Michael Carona



**REDACTED**

Additionally, Sheriff Carona gave Ms. TRUJILLO two personal gifts sometime between the spring and summer of 2001. One gift was a Tiffany's bracelet and the other was a crystal jewelry box. Although he never gave her a card or written note with the gifts, Ms. TRUJILLO still has the items and the boxes they came in.

**PHYSICAL DESCRIPTIONS:**

None.

**EVIDENCE:**

None.

**ATTACHMENTS:**

None.

Sabina Shakovsk  
Special Agent

4/21/06  
Date

[Signature]  
Special Agent Supervisor

7/26/06  
Date

bs  
S: April 21, 2006



**EXHIBIT F**  
**TO THE DECLARATION OF COURTNEY R. CHAVEZ IN SUPPORT OF**  
**DEFENDANT'S OPPOSITION TO GOVERNMENT'S MOTION TO ADMIT**  
**EVIDENCE**

FD-302 (Rev. 10-6-95)

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 01/02/2008

On 12/27/2007, Sandy Murphy, formerly Sandy Trujillo, came to the offices of the United States Attorney in Santa Ana, California accompanied by her attorney Randy Renick. Besides the below listed agents, Assistant United States Attorneys Ken Julian and Brett Sagel were also present for the interview. Murphy provided the following information:

Murphy is currently a Staff Assistant with the Orange County Sheriff's Department (OCSD), which she considers to be a demotion from her previous position. When Murphy starting cooperating with investigators, Jack Anderson of the OCSD came into her unit and reorganized it. Part of Anderson's reorganization was to reassign Murphy to a new job which paid 50 cents an hour more, but involved lessor duties than her prior position. Upon being reassigned, Murphy received a cake at her "celebration" of her reassignment.

Murphy recalled that Mike Carona once left a message saying that Mike Schroeder was going to call her in order to go through the questions she might be asked regarding her relationship with Carona. However, Murphy said she never actually received a telephone call from Schroeder.

Carona spoke with Murphy regarding George Jaramillo's situation and updated her on Jaramillo's status before he was fired by Carona in 2004. In fact, Murphy said Carona told her he had inside information that Jaramillo was going to be prosecuted before Carona fired him. Carona once told Murphy that he was going to take down Jaramillo after Jaramillo was fully vested in his retirement.

With respect to her previous statements regarding Carona's instruction's to her in reference to the Orange County District Attorney's investigation, Murphy recalled that Carona told her to both "lie and deny" about their relationship. Carona often used repetitive words in his sentences or phrases, which Murphy termed a "Carona-ism." Other "Carona-isms" include "Flat out didn't happen" or "Flat ass didn't happen", "Never ever happened", and "Take it to the grave." All of these phrases were used by Carona with an inference to not being truthful about something. Anyone close to Carona, such as Elaine Vasquez, Jaramillo, Debra

Investigation on 12/27/2007 at Santa Ana, California

File # [REDACTED]  
by SA Anthony D. Alston: ada  
SA Steve Berryman (IRS)

Date dictated \_\_\_\_\_

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Exhibit F

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Continuation of FD-302 of \_\_\_\_\_

On 12/27/2007, Page 2

Hoffman, Don Haidl, Jim Amormino, or Sherry Deshon (sp), would have had to have heard him use these phrases.

Murphy recalled that when Carona called her, which was the day of Lt. Linda Preiny's retirement party, and told her to lie about their relationship, he also said that unless they produce an 8 x 10 glossy of us, it didn't happen. Murphy said Carona used the "8 X 10 glossy" phrase on other occasions as well. Murphy said she had already spoken to the OCDA's office at the time she received this call from Carona.

On this occasion when Carona told her to lie about her relationship with him, Murphy told Carona that other people such as Bud Hood knew about their relationship. Carona replied by telling Murphy that Hood wasn't going to say anything about their relationship. Murphy said she was not going to lie about her affair with Carona, but wanted to avoid being asked the question about it. Murphy has never spoken to Carona about the interview since it occurred.

Carona had a pinhole camera hidden in the ceiling tiles of his office and Bud Hood changed the video tapes from this camera. Carona had an office that was rented in Hood's name. Murphy knew this from messages she overheard between Carona and Hood. Hood did a lot of personal favors for Carona. She mentioned Vasquez, Sherry Deshon (sp) (Carona's former secretary at the Marshal's office), OCSD employees Sgt. Giles, Bill Davis, Jim Horn, Pete Sellars, Joanne Galisky, Anderson, Steve Bishop, Tom Davis, and Tom Twellman as people who would have information about Hood's involvement with Carona.

Murphy said she could not say that Carona told her to lie to federal or state investigators, but Carona told her repeatedly to lie over the course of their relationship.

Murphy recalled that Deshon once told her to never get on Carona's bad side because he would destroy her. Deshon gave Murphy an example of a person who was convicted of embezzlement who was a good friend of Carona's. Apparently, Carona turned his back on this friend and "screwed" him. Murphy said this happened when Carona was the Marshal and Carona did something to fuel the demise of his friend. Murphy thought Carona may have had an investment with his friend, or something to that effect.

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Exhibit F

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Murphy said Geneve Gomez does some fill-in work in the OCSD executive offices.

During the interview, Murphy's attorney, Mr. Renick, advised that at some point Debra Hoffman called him and effectively represented to him that she was representing Carona. Hoffman wanted to find out about the nature of the charges Murphy was to file against Orange County regarding her sexual harassment allegations.

Murphy recalled seeing a fax at the OCSD regarding CHG, and she spoke to Carona about the contents of this fax. This occurred around 2001 before she was transferred to South County in December 2001. Murphy said she brought this topic up with the OCDA as well.

Prior to Joe Cavallo's bail bond issues became public, Carona was "fishing" for information from Murphy about the subject and wanted to know about Cavallo and Tom Davis' involvement in bail bond matters. Murphy said Carona acted as if he knew what was going on with regard to Cavallo and the bail bond issue.

During the point in time that Cavallo was representing Jaramillo, Carona told Murphy that he wanted her to talk to Tom Davis to get Don Haidl to resign from his position as Assistant Sheriff. Carona said he had already spoken to Haidl about resigning, but Haidl wouldn't resign because he didn't want to do that to the OCSD.

The subject of an inadvertent recording of a conversation between Murphy and Carona was discussed. Murphy said she has not actually heard the recording and would like to hear it, but based on what she has been told, the recording accurately reflects the details of what happened. Murphy said she and Carona were in one car, while Carona's wife was in a second car, when Carona and Murphy became lost. At this point the conversation between Murphy and Carona gets inadvertently recorded on a cell phone when Carona started putting his hands down Murphy's pants while they were in the car together.

Murphy recalled that she heard from Robert Hoggman (sp) about an incident involving Jaramillo and Debbie Weatrowski. Hoggman told Murphy that Dep. Bill Drake was involved in a surveillance in Huntington Beach which resulted in Jaramillo getting caught receiving a "blow job" in a car from Weatrowski.

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Exhibit F

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Apparently, a story was manufactured which claimed Jaramillo and Hoffman were representing Weatrowski in a divorce in an effort to cover up the incident. Carona confirmed with Murphy that he saved Jaramillo by coming up with this false story. Carona specifically told Murphy that this was a false story to cover up the incident. Murphy thought Weatrowski also knew about the false story, and Hoffman acknowledged to Murphy that this was a false cover story as well.

Murphy said the only time she was given cash by Carona was to pay for a \$60.00-100.00 limousine ride on one occasion. Generally, Carona paid for meals the two would have with credit cards.

Murphy and Carona had conversations about Greg Haidl's case, but Murphy could not recall the specific details of the conversations. Murphy recalled that Carona knew the Greg Haidl case was hurting him politically.

Carona told Murphy that he got Hoffman and Jaramillo appointed to State boards. Carona said he got Hoffman's husband a job at the OCSD because Hoffman was hurting for money. Carona further told Murphy that he arranged for Hoffman to get a home in Newport Beach. Murphy recalled the references at the OCSD to a person identified by the initials DG. This person was the only one referred to only by initials that she could recall.

With regard to Murphy's claims of being sexually harassed by Jaramillo, she met Carona in Palm Springs to discuss the matter. Initially, Murphy thought Carona was just being nice by speaking with her, and never thought she would have sex with him. Murphy said she did not plan on spending the night with Carona, and didn't even have an overnight bag. After having dinner together, where they briefly spoke of Murphy's sexual harassment claim, the two went to Carona's room and eventually had sex. Murphy said she felt Carona disarmed her, but she did not tie having sex with Carona to her sexual harassment lawsuit.

Murphy said Deshon and Twellman worked around the clock on Carona's first campaign. Deshon said she worked partially on Carona's campaign while she was working or on Marshal's office hours by doing things like sending out letters related to the campaign.

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Exhibit F

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[REDACTED]

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In reference to Murphy's local grand jury testimony, Murphy said she answered the questions asked of her as they pertained to Jaramillo, because that was the way the questions were framed. Murphy said she also answered the questions thinking that she didn't want to go down the road of her sleeping with Carona. Murphy said she did not lie about sleeping with Carona, it was just that the question was asked if she had slept with several OCSD personnel, and by answering no to the way in which it was asked, she was telling the truth.

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Exhibit F