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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FLORENTINA PELAYO,)
individually, and as successor)
in interest to decedent PETRICA)
MUNTEAN,)
)
Plaintiff,)
)
vs.)
)
CITY OF ANAHEIM, KENNETH)
JOHNSON, ALEXANDRIA)
GONZALEZ, DARREN LEE, PETER)
WANN, MICHAEL FLEET, BRENDAN)
THOMAS, HEATHER SCAGLIONE,)
BARTMAN HORN, and DOES 1 through)
10, inclusive,)
)
Defendants.)
_____)

No. 8:19-cv-02318
MCS (ADSx)

DEPOSITION BY ZOOM OF ALEXANDRIA GONZALEZ, taken on
behalf of the Plaintiff, commencing at 3:24 p.m., on
December 16th, 2020, before Michael G. McMorran, CSR
No. 13735.

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I N D E X

WITNESS: Alexandria Gonzalez

EXAMINATION	PAGE
By Mr. Steering	4

E X H I B I T S

EX.	DESCRIPTION	PAGE
202	Officer Safety Bulletin	16
214	Officer Gonzalez's body-worn camera footage	17
242	E-mail dated 04/12/18	14
245	Officer Gonzalez's DA interview transcript	11
279	Series of photographs	26

I N F O R M A T I O N R E Q U E S T E D

None.

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DECEMBER 16TH, 2020; 3:24 P.M.

* * *

ALEXANDRIA GONZALEZ,

having been first duly sworn, was examined and testified as follows:

-oOo-

EXAMINATION

BY MR. STEERING:

Q Hi.

A Hi there.

Q What's your full legal name, please?

A Alexandria Gonzalez.

Q Do you have a middle name?

A Clayton.

Q Clat -- C-l-a-y-t-o-n?

A Yes.

Q Gonzalez. And you're a police officer with Anaheim PD?

A Yes.

Q And how long have you been a police officer with Anaheim PD?

A Just under three years.

Q And is your present rank police officer?

A Yes.

Q And are you assigned to patrol?

1 A Yes.

2 Q And have you been assigned to patrol the
3 entire time you've been with Anaheim PD?

4 A Yes.

5 Q Okay. Okay. Have you reviewed any documents
6 or recordings in preparation for your testimony today?

7 A Yes.

8 Q And what have you reviewed, please?

9 A My DA statement and my body-worn camera.

10 Q Okay. Anything else, ma'am?

11 A No.

12 Q Okay. Have you worked for any police agency
13 other than the Anaheim Police Department?

14 A No.

15 Q Okay. Where did you get your police academy
16 training?

17 A Orange County Sheriff's Academy.

18 Q Okay. At the Orange County Sheriff's Academy,
19 were you trained on the use of a beanbag gun?

20 A Yes.

21 Q And during your tenure with Anaheim PD, have
22 you been trained by Anaheim PD about the use of a
23 beanbag gun?

24 A Yes.

25 Q Was your training with Anaheim PD some kind of

1 class or a briefing or seminar or what was it?

2 MR. JOHNSON: Objection. Overbroad.

3 BY MR. STEERING:

4 Q Pardon me, ma'am? I didn't hear the answer.

5 MR. JOHNSON: Go ahead, Officer Gonzalez.

6 THE WITNESS: It's when we're in the range.

7 BY MR. STEERING:

8 Q Okay. You mean teaching how to shoot the
9 weapon; is that correct?

10 A Yes.

11 Q Did you have a beanbag gun with you on April
12 the 13th, 2018, the day of this incident with
13 Petrica Muntean?

14 A Yes.

15 Q Did you take your beanbag -- well, were you --
16 did you -- not shoot, but did you take your beanbag gun
17 out of the whatever it was held in and walked some
18 distance with it during this April 13th, 2018,
19 incident?

20 MR. JOHNSON: Objection. Vague.

21 THE WITNESS: Can you rephrase the question,
22 please?

23 BY MR. STEERING:

24 Q Did you take the -- your beanbag shotgun from
25 your patrol vehicle on April the 13th, 2018, and walk

1 some distance with it?

2 A No.

3 Q Okay. Did you take your -- did you hold your
4 beanbag shotgun at any time during the February --
5 excuse me.

6 Did you hold your beanbag shotgun at any time
7 during the April 13th, 2018, incident?

8 A No.

9 Q Okay. Are you trained about the standards for
10 the use of a beanbag gun?

11 A Yes.

12 Q And in terms of when an
13 Anaheim Police Department officer is permitted to shoot
14 somebody with a beanbag gun, what is the standard that
15 you're taught at Anaheim PD?

16 MR. JOHNSON: Objection. Overbroad.

17 THE WITNESS: When the subject is a threat.

18 BY MR. STEERING:

19 Q And when you say "a threat," you mean like a
20 threat of physical harm or violence?

21 A Yes.

22 MR. JOHNSON: Objection. Argumentative.

23 BY MR. STEERING:

24 Q I mean, anybody is a threat, right?

25 MR. JOHNSON: Objection. Argumentative.

1 BY MR. STEERING:

2 Q Anybody you come into contact with on the
3 street is a potential threat, right?

4 MR. JOHNSON: Objection. Incomplete
5 hypothetical. Argumentative. Misstates her testimony.

6 BY MR. STEERING:

7 Q He's not telling you not to answer. He's
8 just -- there's no judge here to rule.

9 A Oh, okay.

10 Q There's no judge here to say "Yea" or "Nay" on
11 the objections by Mr. Johnson. Of course they're all
12 frivolous, of course, but . . .

13 MR. JOHNSON: I'm making objections for the
14 record, Officer Gonzalez.

15 BY MR. STEERING:

16 Q Yes. There's no judge here to say "Sustained"
17 or "overruled." So Mr. Johnson is just making
18 objections for -- on a paper transcript. That's all it
19 is.

20 A Okay.

21 Q Unless he tells you not to answer the
22 question, then he wants you to answer the question.
23 But if he tells you not to answer the question, then I
24 guess he doesn't want you to.

25 Okay. So you said you're taught at Anaheim PD

1 that the standard for shooting someone with a beanbag
2 gun is when they present a threat of harm to somebody;
3 is that fair?

4 MR. JOHNSON: Objection. Misstates her
5 testimony. Overbroad.

6 THE WITNESS: There's other circumstances that
7 also go into it with the use of the beanbag shotgun.
8 It's based on, you know, is it reasonable based on the
9 totality of the circumstances, you know, for force to
10 be applied, you know.

11 BY MR. STEERING:

12 Q Okay. Go ahead. I'm sorry.

13 Go ahead. Are you done?

14 A Yeah.

15 Q Okay. Does Anaheim train you, like, more
16 specifically than when the shooting would be reasonable
17 under the circumstances, or are there more specific
18 guidelines that you're aware of --

19 MR. JOHNSON: Objection --

20 BY MR. STEERING:

21 Q -- about --

22 MR. JOHNSON: -- vague.

23 BY MR. STEERING:

24 Q -- about shooting a beanbag gun?

25 MR. JOHNSON: Objection. Lack of foundation.

1 Calls for speculation. Vague. Argumentative.

2 BY MR. STEERING:

3 Q Go ahead.

4 A Can you answer -- or repeat the question?

5 Q Are the standards that you're taught by the
6 Anaheim Police Department for when an
7 Anaheim Police Department police officer can shoot a
8 civilian with a beanbag gun -- are those standards more
9 specific than just when a person that presents a threat
10 of harm to others?

11 MR. JOHNSON: Objection. Incomplete
12 hypothetical. Overbroad. Vague.

13 THE WITNESS: Yeah, there's more. It's to,
14 you know, overcome resistance, you know, to effect an
15 arrest.

16 BY MR. STEERING:

17 Q You mean so, like, if you're trying to
18 handcuff somebody and they're pulling away, you can
19 shoot them with a beanbag gun; is that what that means?

20 A Not necessarily.

21 MR. JOHNSON: Objection. Argumentative.
22 Misstates her testimony.

23 BY MR. STEERING:

24 Q Is that what that means?

25 A Not necessarily.

1 Q Okay. All right. Anyway, let me just have
2 identified -- have you identify a few items for me,
3 please. Okay.

4 I got a little equipment problem here. It's
5 going to take me about a minute to resolve. Please
6 just bear with me.

7 (Off-the-record discussion held.)

8 MR. STEERING: Okay. I'll show you
9 Exhibit 245.

10 (Exhibit 245 was marked.)

11 BY MR. STEERING:

12 Q And it's a 29-page document. It says
13 "Interview of Alexandria Gonzalez on April 13th, 2018
14 at the Anaheim Police Department."

15 Do you remember giving this interview, ma'am?

16 A Yes.

17 Q Okay. Now, I can scroll through -- if you
18 want me to, I can scroll through, like, some of the
19 pages, all of the pages, whatever you want, but I'm
20 trying to get the item authenticated as a transcript of
21 your audio-recorded interview.

22 I don't know at what point you want me to go.
23 I'll just keep on going if you want to.

24 A Oh.

25 Q I just need you to identify the document. The

1 highlight is mine. I put that in there. Okay?

2 A Oh, okay.

3 Q The highlighting? Okay? So I put the
4 highlighting in, but in terms of the document, the
5 underlying document itself, is this the interview --
6 the transcript of your interview of April 13th, 2018?

7 A Yes, it is.

8 Q Okay. Did you -- when you prepared for this
9 deposition, did you have a chance to look at the
10 audio -- or excuse me, listen to the audio and look at
11 the transcript of that audio of this recorded
12 interview?

13 A I have read the transcript.

14 Q Okay. Did the transcript seem accurate to
15 you?

16 A Yes.

17 Q Okay.

18 MR. JOHNSON: Objection. Overbroad.

19 BY MR. STEERING:

20 Q Okay. When you -- when you sat for this
21 interview with Detective Cesar Flores, did you do your
22 best to tell the truth as best as you believed it to
23 be?

24 MR. JOHNSON: Objection. Overbroad.

25 THE WITNESS: Yes.

1 BY MR. STEERING:

2 Q Okay. All right. Now let's see.

3 Now, when you -- do you remember what hours
4 you worked during your shift on April 13th, 2018, the
5 day of the shooting of Petrica Muntean, ma'am?

6 A Yes.

7 Q And what was that -- what shift was that,
8 please?

9 A That shift was Team 7.

10 Q And what hours does Team 7 work? From when to
11 when, please?

12 A On Fridays, it's 06. And then typically it's
13 to 6:30 p.m., but because it was our payback, you work
14 a ten-hour shift. So my specific shift that day was
15 from 06:00 a.m. to 4:00 p.m.

16 Q Were you with a partner that day?

17 A A training officer.

18 Q Okay. So was Johnson your field training
19 officer?

20 A Yes.

21 Q That's Kenneth Johnson?

22 A Yes.

23 Q Okay. And you -- who was driving the patrol
24 car?

25 A I was.

1 Q Okay. And at the beginning of your shift, did
2 you have some kind of briefing that included a mention
3 about an incident the evening before with
4 Petrica Muntean?

5 A Yes.

6 Q Do you remember what the briefing was
7 generally, ma'am?

8 A Yes, it --

9 MR. JOHNSON: Objection. Overbroad.

10 BY MR. STEERING:

11 Q What was it?

12 A They reviewed the e-mail that was sent out.

13 Q Okay. And did you review the e-mail?

14 A Yes, I did.

15 Q Okay.

16 MR. STEERING: Okay. Here's Exhibit 242.

17 (Exhibit 242 was marked.)

18 BY MR. STEERING:

19 Q Can you read -- because I know the letters are
20 kind of small, what's shown in 242, or would you like
21 me to make it bigger?

22 A Yeah, maybe a little bit bigger.

23 Q Now, the whole image isn't in there, but I can
24 move it back and forth.

25 A Okay.

1 Q Just let me know when you want me to shift it.

2 A Do you want me to read this out loud or to
3 myself?

4 Q Whichever way you prefer. But it's probably
5 easier if you just read it to yourself. But just let
6 me know when you want me to move it to the right and
7 back to the left. Okay?

8 A Okay. Can you please move it over? Thank
9 you.

10 Q Let me know when you want me to move it.

11 A Okay. Back left.

12 Q It's okay.

13 A Okay. Thank you. Yeah. Okay. Back left.
14 I've read the e-mail.

15 Q Okay. Is that the e-mail that you got at your
16 briefing at the beginning of your shift on April 13th,
17 2018?

18 A There was a photo.

19 Q Okay. I'm going to bring up the next exhibit.

20 A Oh.

21 Q Which is -- see, you got a very good memory.
22 Better than mine. Let's see.

23 MR. STEERING: Okay. Okay. Now, here's
24 another one. It's -- it says (As read:) Officer
25 Safety Petrica Peter Muntean.

1 And then it talks about an incident that
2 happened on April 12th, 2018. And it's got a picture
3 of him.

4 BY MR. STEERING:

5 Q Is this the one with the picture you were
6 talking about?

7 A Yes.

8 MR. STEERING: It's Exhibit 202.

9 (Exhibit 202 was marked.)

10 BY MR. STEERING:

11 Q Okay. Did anyone say anything to you at
12 either the briefing or otherwise prior to
13 Petrica Muntean getting shot on April 13th, 2018, that
14 the gun that he had on the night before, on the evening
15 of April 12th, 2018, was a fake gun?

16 Did anyone ever say anything like that to you?

17 MR. JOHNSON: Objection. Lack of foundation.

18 Calls for speculation.

19 THE WITNESS: No.

20 BY MR. STEERING:

21 Q And did you hear anyone say anything like that
22 or about that issue during that day, ma'am?

23 THE WITNESS: No.

24 MR. JOHNSON: Objection. Asked and answered.

25 /////

1 BY MR. STEERING:

2 Q Okay.

3 MR. STEERING: Moses, what do I do to turn the
4 sound on on a video?

5 MR. JOHNSON: When you first pull up
6 share-screen, when you look at the bottom, I believe
7 it's left, there's a box you got to check that says
8 "Share Sound."

9 MR. STEERING: Yeah, I see it. I see it.

10 MR. JOHNSON: I think that's the mistake we
11 made in the first depo. Neither one of us remembered
12 to check that.

13 MR. STEERING: Okay. Thank you. Now I know
14 what I missed. Okay. This is going to take -- you can
15 see -- the whole video -- this is your body cam video.
16 The whole video is 22 minutes and eight seconds.

17 So let's -- let me just play it; so you can
18 identify it, and then I'll play it so we can talk about
19 what happened. Okay? So this is Exhibit -- gee whiz,
20 what exhibit is this? Exhibit 214.

21 (Exhibit 214 was marked.)

22 BY MR. STEERING:

23 Q I'll start playing it. All right.

24 I stopped it at one minute, two seconds of the
25 recording.

1 Do you remember Petrica Muntean crying when
2 you and Officer Johnson first approached him, ma'am?

3 MR. JOHNSON: Objection. Lack of foundation.
4 Calls for speculation.

5 THE WITNESS: No.

6 BY MR. STEERING:

7 Q Okay. And did you say anything to Mr. Muntean
8 throughout this entire incident?

9 MR. JOHNSON: Objection. Vague as to time.

10 THE WITNESS: I do say a few words to him.
11 It's a little bit later.

12 BY MR. STEERING:

13 Q Okay. I'm going to pick it up at one minute,
14 two seconds of Exhibit 214.

15 Okay. So I stopped it at a minute and 37
16 seconds. And I heard you say, "We don't want to hurt
17 you, we want to help you." That's what you said,
18 right?

19 A Yes.

20 Q Correct? Okay. Did you -- at the time you
21 made that statement, did you suspect Mr. Muntean of
22 having committed a crime?

23 MR. JOHNSON: Objection. Vague.

24 THE WITNESS: Peter was on PCRS. And the
25 night prior, he had been armed with a gun was what we

1 were told.

2 BY MR. STEERING:

3 Q Okay. So you thought that he was a felon in
4 possession of a firearm?

5 A Yes.

6 Q Okay. Did you suspect him of any other crimes
7 at that time?

8 MR. JOHNSON: Objection. Overbroad.

9 THE WITNESS: No. We -- Officer Johnson had
10 mentioned that he was sitting next to the car that had
11 expired registration and that he wanted to go talk to
12 the subject.

13 BY MR. STEERING:

14 Q Because of the registration? I mean, I'm
15 curious, what does the registration have to do with
16 anything, if anything?

17 A That's what originally brought us to the
18 attention of the subject sitting next to the curb.

19 If you want to ask further questions, it was
20 Officer Johnson who made contact.

21 Q You mean you and Officer Johnson approached
22 Mr. Muntean in the Carl's Jr. parking lot because he
23 was sitting next to a car with an expired tag on it; is
24 that correct?

25 MR. JOHNSON: Objection. Asked and answered.

1 Argumentative.

2 THE WITNESS: Yes, that's originally why we
3 got out of the car to talk to the subject.

4 BY MR. STEERING:

5 Q Had you been to Carl's Jr. earlier that
6 morning?

7 A Yes.

8 Q And that was in regard to a -- Mr. Muntean
9 acting a little strange around the restaurant; is that
10 the case?

11 MR. JOHNSON: Objection. Overbroad.

12 THE WITNESS: It was referenced a trespassing
13 call at the Carl's Jr.

14 BY MR. STEERING:

15 Q Did you respond to the call?

16 A Yes.

17 Q Did you find out -- when you got to the
18 Carl's Jr., did you and/or Officer Johnson speak with
19 someone there to find out what happened?

20 A Yes.

21 Q And who did the speaking? You or
22 Officer Johnson or both of you?

23 A I don't recall.

24 Q Okay. Do you remember what you learned when
25 you went to the Carl's Jr. earlier that morning prior

1 to this encounter that we're looking at with
2 Mr. Muntean?

3 A Yes.

4 Q And what do you recall?

5 A That the subject had -- that was trespassing
6 causing disturbance left the business prior to our
7 arrival.

8 Q Did the man or lady that you spoke with at the
9 Carl's Jr. say what the nature of the disturbance was,
10 ma'am?

11 A I don't recall.

12 Q Did you come away with the impression that
13 Mr. Muntean had committed some crime at Carl's Jr. that
14 morning?

15 MR. JOHNSON: Objection. Asked and answered.

16 THE WITNESS: Can you rephrase it, the
17 question?

18 MR. STEERING: Can I have the reporter read
19 the question back, please?

20 (Record read.)

21 MR. JOHNSON: Same objection.

22 THE WITNESS: No.

23 BY MR. STEERING:

24 Q Okay. And when you drove your patrol vehicle
25 over back to the Carl's Jr., did you drive in that lot

1 to look for Mr. Muntean, or did you drive in that lot
2 just because you were driving around or for some other
3 reason?

4 A We were still in the lot because of the prior
5 trespassing call at the Carl's Jr. We never left the
6 parking lot and then we returned.

7 We were just always in that parking lot.

8 Q You were what in the parking lot?

9 A We were always in the parking lot; so we
10 parked there.

11 Q Oh, always there?

12 A Yeah.

13 Q Okay. I thought you said "08." I was going
14 to say, gee, I'm not familiar with that code. Okay.

15 Sorry. And then we'll pick it up at a minute,
16 37 of your body-worn camera recording.

17 Okay. I stopped it at three minutes and 24
18 seconds. It looks like you're running, is that -- or
19 at least some kind of jogging; is that fair?

20 A Yes.

21 Q Okay. And why are you running?

22 MR. JOHNSON: Objection. Misstates her
23 testimony.

24 BY MR. STEERING:

25 Q Or jogging, whatever you're doing.

1 A To keep pace with the vehicle.

2 Q Were you using the vehicle as cover?

3 A As best as I could.

4 Q Okay. I mean, that's something that officers
5 do, right? I mean, if you think somebody got a gun and
6 you're kind of after them, you may want to be able to
7 duck behind something; is that fair?

8 MR. JOHNSON: Objection. Misstates her
9 testimony.

10 BY MR. STEERING:

11 Q Is that fair, ma'am?

12 A Yes.

13 Q Okay. Pick it up at three minutes and 24
14 seconds.

15 Do you hear the gunshots? I stopped it at
16 four minutes, 47 seconds. Did you hear the gunshots a
17 few seconds before I stopped the video, or the sound of
18 a shot?

19 MR. JOHNSON: Objection. Calls for
20 speculation. Lack of foundation.

21 THE WITNESS: I heard some loud noises.

22 BY MR. STEERING:

23 Q Do you know if that's a beanbag shotgun sound?

24 MR. JOHNSON: Objection. Lack of foundation.

25 Calls for speculation.

1 THE WITNESS: I don't know.

2 BY MR. STEERING:

3 Q Well, when you were traveling along the street
4 in the position shown at four minutes, 47 seconds, did
5 you think that somebody had shot Mr. Muntean with a --
6 any type of beanbag device?

7 MR. JOHNSON: Objection. Lack of foundation.
8 Calls for speculation.

9 THE WITNESS: At this exact time, I didn't
10 recall.

11 BY MR. STEERING:

12 Q You mean you don't recall what you thought at
13 that time?

14 MR. JOHNSON: Objection. Misstates her
15 testimony. Argumentative. Asked and answered.

16 BY MR. STEERING:

17 Q Go ahead.

18 A I don't recall at that exact moment what I was
19 thinking. But later, I did see a less lethal shotgun
20 used.

21 Q Okay. I'll pick it up at four minutes, 47
22 seconds.

23 Now, I stopped it at five minutes, one second.
24 I mean, it sounded like a shot from somebody and then
25 Mr. Muntean screaming.

1 Did it sound that way to you, ma'am?

2 A Yes, it did.

3 Q Okay. Do you know who the officer is directly
4 in front of the camera at five minutes and one seconds?

5 A It appears to be Officer Scaglione.

6 Q Okay. Pick it up at five minutes and one
7 second of Exhibit 214.

8 Okay. I'm going to back it -- I stopped it at
9 five minutes, 21 seconds. I'm just going to back it up
10 a little.

11 I stopped it at five minutes, 21 seconds of
12 the recording. There's an officer standing in front of
13 this white car on the left side of the photograph.

14 Do you have any idea who that officer is?

15 A It appears to be Sergeant Lee.

16 Q Okay. I'll pick it up at five minutes, 21
17 seconds of Exhibit 214.

18 Is that you out of breath at five minutes, 55
19 seconds, ma'am?

20 A Yes.

21 Q Okay. Pick it up at five minutes, 55 seconds.

22 Okay. Anyway, I stopped it at seven minutes,
23 28 seconds; so Exhibit 214, is your body-worn camera
24 recording, ma'am?

25 A During this incident?

1 Q Yes, ma'am.

2 A Yes, it was recording.

3 Q Okay. And let's see what we got here. Okay.

4 MR. STEERING: I'm going to show you
5 Exhibit 279.

6 (Exhibit 279 was marked.)

7 BY MR. STEERING:

8 Q And let me see if I can turn it. Okay. Is
9 that you?

10 A Yes, it is.

11 Q This is Exhibit 279. Okay. I'm just going to
12 show you these photographs. These are all photographs
13 of you and your equipment that you had on you, or with
14 you on April 13th, 2018?

15 A Yes.

16 Q Okay. Did you ever see Petrica Muntean hold
17 or point any gun?

18 A No.

19 Q Would you say that from your encounter with
20 Mr. Muntean at the Carl's Jr. parking lot, that you
21 came to the belief that he does -- he did not know what
22 was going on at the time?

23 MR. JOHNSON: Objection. Lack of foundation.
24 Calls for speculation. Overbroad.

25 THE WITNESS: Can you rephrase that question?

1 BY MR. STEERING:

2 Q From your contact with Petrica Muntean at the
3 Carl's Jr. parking lot on April 13th, 2018, did you
4 come to the belief that he did not know -- that he did
5 not understand what was going on?

6 MR. JOHNSON: Same objections.

7 THE WITNESS: I don't really know what he was
8 thinking or what was going through his head at that
9 time. I'm not him.

10 BY MR. STEERING:

11 Q And then you did -- you rendered emergency
12 medical care to Mr. Muntean?

13 A Yes.

14 Q And did he have a pulse when you were doing
15 that?

16 A I did not personally check for his pulse, but
17 from the body-worn cameras we saw, Officer Johnson
18 mentioned he had a light pulse.

19 Q Okay. And you're trained in -- are you
20 trained in CPR, ma'am?

21 A Yes.

22 Q And did you do something to Mr. Muntean other
23 than CPR? You know, I'm not an emergency medical
24 expert. I'm just trying to see if --

25 MR. JOHNSON: Objection. Vague.

1 BY MR. STEERING:

2 Q Go ahead.

3 A I believe I cut his pants to see if he had any
4 additional wounds on his lower, you know, part of his
5 body.

6 Q Okay.

7 MR. STEERING: I think I'm done. Why don't we
8 just take a few minutes and let me look and see if I'm
9 done with Officer Gonzalez. Okay?

10 MR. JOHNSON: Okay. Let's take a few minutes
11 for a restroom break.

12 MR. STEERING: Okay.

13 MR. JOHNSON: Thank you.

14 (Off the record from 4:09 p.m. to
15 4:13 p.m.)

16 MR. STEERING: I'm done.

17 MR. JOHNSON: Okay. If you're done and we're
18 still going by the federal rules, and, again,
19 Mr. Reporter, I'll need a certified copy.

20 (Proceedings concluded at 4:14 p.m.)

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STATE OF CALIFORNIA)
) SS.
COUNTY OF ORANGE)

I, the undersigned, say that I have read the foregoing deposition, and I declare, under penalty of perjury, that the foregoing is a true and correct transcript of my testimony contained therein.

EXECUTED this _____ day of _____,
20__ at _____, California.

ALEXANDRIA GONZALEZ

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DEPOSITION OFFICER'S CERTIFICATE

STATE OF CALIFORNIA)
) SS.
COUNTY OF ORANGE)

I, Michael McMorran, hereby certify:

I am a duly qualified Certified Shorthand Reporter, in the state of California, holder of Certificate Number CSR 13735 issued by the Court Reporters Board of California and which is in full force and effect. (Fed. R. Civ. P. 28(a)).

I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the witness was first duly sworn by me. (Fed. R. Civ. P. 28(a), 30(f)(1)).

I am not a relative or employee or attorney or counsel of any of the parties, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in this action. (Fed. R. Civ. P. 28).

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition and the foregoing transcript is a

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true record of the testimony given by the witness.
(Fed. R. Civ. P. 30(f)(1)).

Before completion of the deposition, review of
the transcript [X] was [] was not requested. If
requested, any changes made by the deponent (and
provided to the reporter) during the period allowed,
are appended hereto. (Fed. R. Civ. P. 30(e)).

Dated: 12/29/2020



MICHAEL G. MCMORRAN, CSR No. 13735

CORRECTION SHEET

Case: Pelayo vs. City of Anaheim

Deponent: Alexandria Gonzalez

Date: December 16, 2020

PAGE/LINE	ERROR	CORRECTION