SONOMA COUNTY SHERIFF'S OFFICE
INTERNAL AFFAIRS INVESTIGATION
23-C-0001

BACKGROUND SUMMARY

On January 4, 2023, Lieutenant Sean Jones from the Professional Standards Bureau assigned this investigation to Windsor Administrative Sergeant James Percy. When Sgt. Percy was assigned this case, he was provided with a memorandum authored by Windsor Police Department Sergeant Jeff Toney, which outlined a complaint he received. Sgt. Percy was also provided with a copy of crime report (WI2201[redacted]).

Sergeant Toney's Inter-Office Memorandum read:

> *"On Friday 12/30/2022, I was on duty working my assignment as patrol supervisor at the Windsor Police Department. At approximately 1425 hours, Deputy Jordan Puleo contacted me in the sergeant's office and inquired if I had seen the call for service pending for me. I explained I had not, and Puleo told me it was a complaint about him.*
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> *"I asked Deputy Puleo what the complaint was referencing? Deputy Puleo told me it was regarding a domestic violence report he investigated in Windsor a few months ago, where he arrested the female half, and she later sent him photographs. I assumed he was possibly speaking about injury photographs, but I wasn't sure.*
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> *"During this time, I checked I/NetViewer on my work computer while asking Deputy Puleo who the complainant was. I saw the pending call for service was a 10-21 request (**Event # WI2236**[redacted]), and the callers name was [redacted]. I asked Deputy Puleo if he knew what the complaint was about. Deputy Puleo explained [redacted] was the victim, and husband of the arrestee of the domestic violence incident he investigated. He said [redacted] was probably wanting to complain about the photographs his wife had sent him. I asked Deputy Puleo what type of photographs he received, and he told me they were inappropriate photographs.*
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> *"Unsolicited, Deputy Puleo told me he saw [redacted] inside the Windsor Walmart yesterday. He said [redacted] verbally got his attention by asking him if he remembered him, while removing his medical mask to reveal his face. Deputy Puleo said he acknowledged [redacted] and [redacted] angrily told Puleo he knew he received pictures of his wife. [redacted] continued to berate Puleo and they ultimately walked away from each other. Again unsolicited, Puleo told me what he had done was a bad decision, and that he had learned his lesson. When asked, Deputy Puleo told me he received the photographs on his work cell phone, but he had since deleted them. I informed Deputy Puleo that I would be calling [redacted].*
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> *"During a computer search, I located the DV report related to [redacted], documented in case **# WI2201**[redacted]**.** This spousal injury report was investigated by Deputy Puleo on 01/27/2022 at 0839 hours. Deputy Puleo subsequently responded to [redacted]*

[redacted] and contacted the victim, [redacted]. As a result of his investigation, Deputy Puleo arrested [redacted] girlfriend of four years, [redacted], on the charge of 273.5 PC.

*"After reviewing the case I telephoned [redacted]. My entire conversation with [redacted] was captured/recorded on my BWC, which I later marked using the complaint call for service (**Event # WI2236[redacted])** and labeled it Restricted. I later viewed this recording to review for documenting this memo.*

"In summary, [redacted] told me his call today was regarding an officer who thinks it's okay to go to people's houses on a dispute, end up with their numbers and asking them for pictures. He said hopefully something can be done about that. [redacted] said he didn't have high hopes there would be anything done about this. [redacted] spoke about how he initially called the police after being punched in the jaw by his wife. He further mentioned Jordan Puleo was the arresting officer who took his wife to jail. He said Jordan Puleo got his wife's phone number and subsequently began asking her for pictures. [redacted] said he also understands Puleo has a wife himself, and he thinks this was scummy.

"When questioned, [redacted] told me his wife disclosed to him she had sent Deputy Puleo pictures of her. [redacted] said he never saw the photographs because his wife had deleted them, but he knows it's true. [redacted] described the look on Deputy Puleo's face when he saw him yesterday at Walmart and confronted him about the photographs. He said Deputy Puleo acknowledged receiving the photographs. [redacted] said he called Puleo a piece of shit for what he had done, referring to him wearing a badge to protect and serve. [redacted] said Puleo should be fired for what he did.

"When asked to elaborate about the photographs, [redacted] told me Deputy Puleo text messaged his wife, asking her to send "ass pictures" of her. He said he's sure she sent them. [redacted] said his wife and Puleo further talked about meeting up, and Puleo told [redacted] wife he wasn't as available as he may of lead to believe.

[redacted] believes it doesn't matter who initiated the relationship, the fact that Puleo wears a badge, he should be accountable. I informed [redacted] his allegations were serious, and not taken lightly by myself. [redacted] said whether we did anything about this wouldn't matter because he would be "dog shitting" on Puleo every time he sees him in public, and hopefully everyone hears it. [redacted] went on to express that he doesn't feel safe with cops coming to his house anymore.

"When asked, [redacted] said he believes the text messaged photographs were being exchanged in February, or March of 2022. [redacted] ended the conversation by telling me he called because he wanted some one to know about this. He further mentioned he

lives in Windsor, and he's sure he will be seeing Puleo around. He said when he does it will be fun for everyone.

"End of interview.

"On 12/31/2022, Deputy Puleo was on a scheduled day off. I contacted him by telephone at 1122 hours and informed him I needed to meet and retrieve his work cell phone. I asked that he not delete any contents from his work phone. Deputy Puleo informed me he was watching his son who was sleeping, so he couldn't come to WPD. At approximately 1200 hours, I met with Deputy Puleo in the roadway fronting his residence, and he provided me his work cell phone. Deputy Puleo inquired as to what was going to happen. I told him I couldn't speak about the matter, however, I recommended he be honest.

"I placed Deputy Puleo's work cell phone in 'Airplane Mode", powered it off, and placed it inside a manilla envelope. I later secured the envelope inside Chief Raasch's office."

On February 23, 2023,[1] after sitting in on Deputy Puleo's interview with Sgt. Percy, Lt. Jones assigned me to assume responsibility over this investigation.

[1] An underlined date indicates it is a part of my investigation – Sgt. Brent Kidder, Internal Affairs

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COMPLAINT / AUTHORITIES

The purpose of this investigation was to determine whether Deputy Jordan Puleo's alleged conduct occurred and, if it did, whether that conduct violated state law, Sheriff's Office Rules and Regulations, and/or Office-Wide policy, more specifically:

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT, AND RESPONSIBILITY

3. Obey Policies and Procedures: Members shall obey and carry out all lawful Sheriff's Office policies, procedures, and other order whether written or oral. Specifically:

Policy 320.5.4 (c) – Standards of Conduct – Relationships
Policy 320.5.8 (c) – Standards of Conduct - Performance
Policy 320.5.8 (i) – Standards of Conduct – Performance
Policy 701.6 – Personal / County-Owned Communication Devices

INVESTIGATION

On January 4, 2023, Sgt. James Percy sent Deputy Puleo an Internal Affairs investigation notice, advising him of this investigation. Deputy Puleo responded via e-mail confirming he received the notice.

On January 4, 2023, Sgt. Percy reviewed Windsor Police Department crime report WI22[redacted]. After reviewing the crime report, Sgt. Percy determined on January 27, 2022, Deputy Puleo investigated a Domestic Violence incident reported by the complainant in this Internal Affairs investigation, identified as [redacted].

On January 17, 2023, Windsor Police Chief M. Raasch provided Sgt. Percy with Deputy Puleo's Windsor Police Department issued cellular phone. At that time, Sgt. Percy determined the cell phone was locked and needed a passcode. He sent Deputy Puleo an e-mail requesting the passcode. Deputy Puleo replied and provided the passcode.[2]

Sgt. Percy met with Crime Scene Investigations Sergeant Gary Lawson and requested the content of Deputy Puleo's department-issued cell phone be downloaded.

On January 15, 2023, Sgt. Percy called [redacted] to schedule an interview. [redacted] agreed to meet with Sgt. Percy in Sebastopol at approximately 1230 hours. Sgt. Percy and Chief Raasch ultimately conducted a recorded interview with [redacted] in the Sebastopol City Plaza.[3]

On January 19, 2023, Sgt. Percy reviewed the associated BWC footage regarding Windsor Police Department case WI220[redacted]-[redacted].[4] After his review of the BWC footage, Sgt. Percy did not observe any law or policy violations.

On January 23, 2023, Sgt. Lawson returned Deputy Puleo's department issued cell phone to Sgt. Percy, along with a thumb drive containing the downloaded information and/or data.

On February 22, 2023, I met with Sgt. Percy and Lt. Jones regarding this investigation. At that time, Sgt. Percy asked me to sit in with him during his interview with Deputy Puleo, which was scheduled for the following day. In preparation of the interview, we reviewed the audio recording of his interview with [redacted]. Below is a summary of Sgt. Percy's interview with [redacted], which I have reorganized for clarity.

Sgt. Percy's interview with [redacted] took place on February 15, 2023, at approximately 1227 hours in the Town Plaza in Sebastopol, CA. Sgt. Percy confirmed [redacted] consented to him audio recording the interview.

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[2] A copy of Sgt. Percy and Deputy Puleo's email thread regarding the passcode can be found in Exhibits.
[3] A digital recording of [redacted] interview can be found in Exhibits.
[4] Copies of Deputy Puleo's and Deputy McGoon's BWC footage can be found in Exhibits.

Sgt. Percy asked [redacted] if she was familiar with Deputy Puleo. She confirmed she was, and stated Deputy Puleo was the deputy who arrested her over a year ago, due to a domestic charge. She confirmed she had never had any contact with Deputy Puleo prior to her arrest. During the interview, Sgt. Percy confirmed the only number [redacted] had for Deputy Puleo was his work cell phone number, which was [redacted].

Sgt. Percy asked [redacted] how her and Deputy Puleo's interaction went from her being arrested to inappropriate [communication]. She explained Deputy Puleo had given her his business card, which had his work cell phone number on it, while at the jail. She stated she felt like she needed to use the card later, because she needed to figure out what was going on with her daughter. She asked Deputy Puleo if he was able to escort her to her residence in Windsor, so she could get her daughter. She admitted Deputy Puleo was helpful when she spoke to him about her case and regarding her daughter.

After that interaction, [redacted] stated there was some text messing going on between them, which she no longer had saved. [redacted] told Sgt. Percy the text messages started out mild. She indicated Deputy Puleo reached out to her asking how she was doing. The conversation progressed when Deputy Puleo made the first move, by making a comment about her appearance. [redacted] couldn't remember exactly what Deputy Puleo said, but he made a comment about her buttocks, possibly about its size. This was the moment [redacted] identified as when the conversation changed from professional to inappropriate. She stated she had already gone to court, everything was done, so there was no reason for Deputy Puleo to be contacting her.

[redacted] said the conversation with Deputy Puleo continued to progress. She admitted both she and Deputy Puleo were responsible for escalating the conversation to an inappropriate level, but she also stated Deputy Puleo asked her for photographs. [redacted] said there may have been one or two instances where she spontaneously sent Deputy Puleo photographs of herself, but she couldn't recall. Sgt. Percy asked if she and Deputy Puleo were 'sexting' each other. [redacted] stated "essentially", but stated Deputy Puleo never sent her photographs of himself. In all, [redacted] believed she sent Deputy Puleo between 10-15 photographs of herself.

Sgt. Percy asked [redacted] to describe the first time she sent Deputy Puleo a photograph and how that played out. [redacted] explained the first time she sent a photograph to Deputy Puleo, was when he commented on her buttocks and about how nice it looked in the pants she was wearing. He then told her he wanted to see it without pants on. She recalled sending him a photograph of herself wearing underwear.

[redacted] explained Deputy Puleo was always talking about her body and about how beautiful she was. She stated there were plans for the two of them to meet up, but she assumed Deputy Puleo was married because he told her he was not as available as she believed he was. She confirmed she never met with Deputy Puleo in-person.

Sgt. Percy asked [redacted] if Deputy Puleo was on-duty at the time he would communicate with her. Initially, [redacted] stated she had no idea but stated their conversations would carry-on throughout the day. Later, she admitted she was aware of Deputy Puleo's schedule, and she assumed he was on-duty because she recalled communicating with him throughout the day. While she was explaining, she told Sgt. Percy she remembered something.

She was not able to recall the specific date, but she told Sgt. Percy that Deputy Puleo was out of town at a training, possibly in the Walnut Creek area. [redacted] stated Deputy Puleo invited her to drive to Walnut Creek, he indicated he had a hotel room, he told her he was thinking about her, and he asked her to send pictures. [redacted] stated she may still have a photograph she sent Deputy Puleo saved on her phone. Per the audio recording, it appeared she searched her phone looking for the photograph. As she was searching for the photograph, [redacted] told Sgt. Percy she recalled this interaction being the point where she realized this wasn't just a flirtatious conversation where Deputy Puleo just wanted explicit photographs, rather, now Deputy Puleo wanted to meet and have sex. [redacted] found the photograph she was looking for and provided the date February 16, 2022, when Deputy Puleo may have been away at training.

Sgt. Percy asked [redacted] what the photograph depicted. [redacted] responded, "a picture of myself" and then she chuckled. Sgt. Percy asked if [redacted] was comfortable showing him the picture or describing the picture to him. [redacted] said she would describe it, and stated it was a picture of her "bending over", exposing her buttocks, while she was wearing red underwear. When Sgt. Percy asked [redacted] if Deputy Puleo asked her to send him a photograph, she stated, "he asked me to pose specifically this way, so that he could see what I would look like, from that angle". She further recalled Deputy Puleo telling her, "I want to see you bent over, with your cheeks spread", regarding the photograph she sent him. Sgt. Percy asked [redacted] if Deputy Puleo was specific about the other photographs he wanted [redacted] to send him. [redacted] replied "sometimes" and stated she recalled an instance when Deputy Puleo told her he wanted to see her "shake" her buttocks.

Sgt. Percy asked [redacted] about feeling obligated to send Deputy Puleo photographs, based on her previous statements during the interview. [redacted] explained, Deputy Puleo never threatened her and there was no 'quid pro quo' situation; however, she stated because of the vulnerable state she was in, and the positive attention she was receiving from Deputy Puleo, she felt she had an obligation to reciprocate because of the things Deputy Puleo helped her with regarding her case. Earlier in the interview, [redacted] indicated, because of the fact Deputy Puleo was in law enforcement, she felt like she did not have a choice but to send the photographs.

Sgt. Percy asked [redacted] if she was comfortable releasing the photograph(s) she still had to him, for his investigation. She paused and said, "if you so desire". She quickly added she did not want anyone else to see the photographs. Sgt. Percy told her this was an internal investigation that contained very sensitive case files, indicating the photographs would be confidential.

[redacted] told Sgt. Percy her communication with Deputy Puleo began the day after she was arrested. She stated she communicated with Deputy Puleo daily, for approximately a month. She stopped

the communication around the middle-to-end of February [2022], because she started to feel gross and disturbed, and she did not want to have anything to do with it anymore. [redacted] told Sgt. Percy she stopped the communication with Deputy Puleo by just stopping talking to him. [redacted] confirmed she never had any sexual phone conversations with Deputy Puleo, and the only inappropriate communication was via text message.

[redacted] told Sgt. Percy she never wanted this [the complaint] to go this far. She explained it was her fiancé's doing, because she had told him about what happened with Deputy Puleo. She admitted her fiancé did not take her communication with Deputy Puleo very well. [redacted] didn't know what to do to stop her fiancé from taking the measures he had taken. [redacted] admitted she was partially responsible for "pushing and pulling" the communication with Deputy Puleo; however, she believed it was inappropriate for Deputy Puleo to "incite" their communication to morph from professional to inappropriate. She also said she wasn't the type of person to start more problems and possibly have him [Deputy Puleo] lose his job. At the end of the interview, [redacted] reiterated she never wanted an investigation, and she did not want her fiancé to take it this far.

After reviewing [redacted] interview, Sgt. Percy and I reviewed some of the information and data discovered in Deputy Puleo's department-issued cell phone. The review of Deputy Puleo's department-issued cell phone revealed Deputy Puleo may have engaged is similar conduct with another female. Specifically, there was a text message conversation with a contact labeled "Crash" on Deputy Puleo's department-issued cell phone. In this conversation, on March 9, 2022, at approximately 1434 hours, Deputy Puleo wrote, "You wanna send me another pic?". "Crash" responded with, "After I get one from you ;)". The conversation continued over the course of approximately 30 minutes, until "Crash" sent Deputy Puleo a photograph of herself. The photograph appeared to have been taken by "Crash" while using a mirror. The photograph depicted a female, presumably "Crash", with her shirt lifted to her neck, exposing her stomach and breasts, which were contained in a bra. The next two messages from "Crash" were a smiley face emoji and a text that read, "I just took that in the bathroom for you, you're welcome." Deputy Puleo responded, "I feel pretty special. Looks good".

Sgt. Percy sent Deputy Puleo an email with an updated Internal Affairs investigation notice, which broadened the scope of this investigation, to include his conduct regarding "Crash". Deputy Puleo replied via e-mail, which confirmed he had received the updated notice.[5]

Sgt. Percy called Deputy Puleo's attorney, identified as Doug Foley, from Rains, Lucia and Stern law firm. They discussed the updated notice without Sgt. Percy divulging specific information regarding "Crash". Sgt. Percy offered to reschedule the interview, due to the late, updated notice. Foley told Sgt. Percy he needed to speak with Deputy Puleo, and he would call Sgt. Percy back.

[5] A copy of the Updated IA Notice and the associated email acknowledgement can be found in Exhibits.

At approximately 1620 hours, Foley called Sgt. Percy and stated he and Deputy Puleo would continue with the date and time previously scheduled.

On February 23, 2023, Sgt. James Percy and I conducted a recorded interview with Deputy Puleo.[6] The interview took place in conference room 2G at the Sheriff's Main Office. Mr. Foley was present with Deputy Puleo during this interview. Below is a summary of this interview, which I have reorganized for clarity.

Sgt. Percy confirmed Deputy Puleo received notification regarding this investigation and he confirmed he sent both Deputy Puleo and Mr. Foley with an updated notice the day before this interview. Sgt. Percy then confirmed with both Deputy Puleo and Mr. Foley the two of them had ample time to review the updated notice, they were prepared, and they were willing to proceed with this interview. Deputy Puleo responded affirmatively. Mr. Foley responded he believed so. He also stated we may need to take a break at some point during the interview and we are "assuming" Deputy Puleo was prepared.

Deputy Puleo described he had been a patrol deputy for approximately six years. At the time of this interview, Deputy Puleo had recently been re-assigned to the Sheriff's Main Office approximately one month prior, because of the allegations involved in this investigation and for his own safety. In essence, Deputy Puleo told Sgt. Percy he didn't want to run into the complainant in this investigation, while on-duty, at his prior assignment, which was the Windsor Police Department. Sgt. Percy confirmed during January 2022, Deputy Puleo was assigned to the Windsor Police Department, he was assigned a Windsor Police Department cell phone, and his department-issued cell phone number was [redacted].

Sgt. Percy brought Deputy Puleo's attention to a citizen's complaint call for service for a Windsor Police Sergeant on December 30, 2022. Deputy Puleo was aware of the complaint and said he was looking at NetViewer when he saw a call where the caller, identified as [redacted], was requesting a phone call from Sgt. Jeff Toney. Deputy Puleo viewed the call and observed [redacted] wanted to complain about him. Deputy Puleo did not recognize [redacted] name, so he conducted a "DAT" search on [redacted], and he reviewed a reference case number dispatch entered into the call. As a result of his search, he learned [redacted] was the victim of a call he had handled approximately one year prior. Deputy Puleo said it "clicked" for him because he had come across [redacted] the day prior in the [Windsor] Wal-Mart.

Deputy Puleo explained, the day prior, while on-duty, he was in Wal-Mart when [redacted] approached him and said something to the effect of, "hey, remember me…did you like those pictures?". At first, Deputy Puleo was confused during the interaction with [redacted] in Wal-Mart, because he didn't recognize him; however, he soon realized what was going on based on [redacted] questions. Deputy Puleo said there wasn't a big scene in Wal-Mart with [redacted],

[6] A digital recording of Deputy Puleo's interview can be found in Exhibits.

so he didn't think much of the interaction. It wasn't until the following day, when he saw [redacted] was complaining about him, when he thought "oh jeez".

After Deputy Puleo saw the complaint, he told Sgt. Percy he looked through his work phone because he wondered if he still had anything on the phone from a year prior. He found a text thread from "her", who he identified as [redacted]. He stated the thread contained a couple text messages from her and a couple text messages from him. He didn't remember the date of the text thread and stated he didn't have any of their other conversations or photographs on the phone. He said, "for some reason, just basically to, ya know, be done with the whole thing, I deleted that text thread, and I deleted her contact." Sgt. Percy asked Deputy Puleo if he deleted the text thread on the same date the complaint came in. Deputy Puleo stated he wasn't sure, but he thought so.

Sgt. Percy asked Deputy Puleo if he was aware the Sonoma County Sheriff's Office had a policy regarding the use of department-issued devices, such as cell phones. Deputy Puleo stated he was more aware now, and he had never really studied the policy. Sgt. Percy asked when Deputy Puleo became aware of the policy. Deputy Puleo responded this incident brought the policy in question "to light", but he didn't need to study the policy to know there were certain things you don't do with your department phone. Sgt. Percy tried to clarify that Deputy Puleo was aware of the policy prior to this incident. Deputy Puleo chuckled and stated, "ah, yes, just because I, I mean I figured there was, but I've never actually searched for it and read it, I don't think." Before Sgt. Percy could ask another question, Deputy Puleo stated, "well, that's not true" and explained he had read through and acknowledged the policy; however, it wasn't on his radar, otherwise he would not have been so careless. Sgt. Percy asked Deputy Puleo about what his understanding of the policies that govern the use of department-issued devices. Deputy Puleo responded, "don't use them inappropriately, um, you know, use them for work purposes, uh, I mean."

Sgt. Percy discussed the January 27, 2022, incident involving [redacted] with Deputy Puleo. He confirmed the call for service on this date was a Domestic Violence call, which Deputy Puleo recalled and was familiar with. Deputy Puleo confirmed he contacted, arrested, and subsequently booked [redacted] into the Sonoma County Jail, as a result of the Domestic Violence call. Deputy Puleo told Sgt. Percy he did not have any contacts with [redacted] prior to the Domestic Violence incident mentioned above, and he stated his last communication with [redacted] was the text message thread he deleted once he was aware of the complaint call for service directed to Sgt. Toney. Deputy Puleo did not have a specific date when he last had contact with [redacted]; however, he stated it was within a year of the incident where he arrested her. When asked how long he communicated with [redacted], Deputy Puleo stated he didn't want to speculate too much, and said it was a short time frame, approximately a month, possibly a little longer.

Sgt. Percy asked Deputy Puleo who initiated contact after he arrested [redacted]. Deputy Puleo said he didn't think [redacted] had ever been arrested before and was asking questions. He provided [redacted] with his business card, which had his work cell phone number pre-printed on it. Deputy Puleo

explained he had provided his business card to suspects in the past; however, he doesn't provide it to every suspect. He did not recall if [redacted] asked for his business card, if he offered it to her, or anything else specific as to why he provided his business card to [redacted]. When asked about when [redacted] reached out to Deputy Puleo after her arrest, Deputy Puleo could not recall specifically, but stated it was safe to say it was within a week of [redacted] arrest. Deputy Puleo also could not recall the context of the communication when [redacted] first contacted him. Deputy Puleo stated he never met with [redacted] in-person, and he recalled all his communication with [redacted] was via text message.

Sgt. Percy asked Deputy Puleo if his conversations with [redacted] deviated from professional to unprofessional. Deputy Puleo answered, "yes." When asked how, he stated he didn't know how it got to the point, but the communication became flirtatious, and progressed to the point where [redacted] sent him "explicit" and "inappropriate" photographs. He could not recall who initiated, when, or how the conversation transitioned from professional to unprofessional. Deputy Puleo confirmed all his conversations with [redacted] were carried out on his department-issued cell phone, and said it was safe to say his conversations with [redacted] occurred both on- and off-duty. He told Sgt. Percy he mainly used his [work cell] phone while on-duty. Deputy Puleo admitted some of his conversations with [redacted], while on-duty, consisted of content that would be considered inappropriate.

Sgt. Percy asked Deputy Puleo if he requested [redacted] meet him while he was out of town at a training. Deputy Puleo couldn't remember if he asked her to meet him or if he mentioned he was away at a training to [redacted], but he recalled some sort of conversation with [redacted] about him being at a training in San Jose. He stated he was away at two trainings, one in Riverside and one in San Jose. He didn't believe he would have mentioned the Riverside training to [redacted], because it was further away, so he assumed it was the San Jose training. When asked to clarify what he remembered, Deputy Puleo stated he recalled his thought, which was, "that could be interesting, you know?". Sgt. Percy asked Deputy Puleo what the purpose would have been for [redacted] to meet him at the hotel where he was staying while away at training. Deputy Puleo stated it was a "thrill" to see how far it could go. He admitted, regardless of whether he was at work or not, his behavior was "not okay" and "inappropriate", at which point he told Sgt. Percy he was married. He explained he wasn't overtly asking [redacted] to "hook up" or to go have sex, rather he was pushing the limit as to what was appropriate for him. He admitted he went past [the limit] for sure. Deputy Puleo told Sgt. Percy he did not recall ever telling [redacted] he wanted to have sex with her. He also did not recall making a statement to [redacted] about meeting with him, at his hotel, for the purpose of having sex.

Sgt. Percy asked Deputy Puleo if he recalled asking [redacted] to send him photographs of her person to his department-issued cell phone. Deputy Puleo couldn't remember if they were "tip-toeing" around asking for photographs, but stated it was possible he made an explicit request; he just couldn't remember how it came about. Sgt. Percy asked Deputy Puleo if he ever requested [redacted] pose, or position her body in a certain way, in the photographs she sent him. Deputy Puleo did not remember doing so, then stated he remembered certain positions of photographs she sent.

Sgt. Percy asked Deputy Puleo to describe the photographs [redacted] sent him. Deputy Puleo stated he could describe "some" of the photographs. The first photograph he described was [redacted] laying on her stomach, on a bed, with her buttocks in the air and wearing a thong. The second photograph he described was of [redacted], who was topless, sitting on a bathroom counter wearing underwear. Sgt. Percy asked Deputy Puleo if there were more than those two photographs. Deputy Puleo stated he believed so, he didn't think those were the only two, but he did not recall specifics of any other photographs.

Sgt. Percy asked Deputy Puleo if he considered the instances when he and [redacted] had these conversations as 'sexting'. Deputy Puleo said he did not and described the conversation as "inappropriate" and "flirtatious". Sgt. Percy asked Deputy Puleo if there was a particular way the text conversations with [redacted] would begin. Deputy Puleo could not recall anything, but then stated he remembered, when [redacted] sent him the last photograph before he deleted it, he asked her if she had any more "material" for her fans, or something to that effect; admitting he was asking her if she had any more photographs. Sgt. Percy asked Deputy Puleo to clarify what he was looking for when he asked [redacted] for photographs. Deputy Puleo replied he was looking for inappropriate photographs of [redacted], like the photographs he described. Sgt. Percy asked Deputy Puleo if he ever made any promises to [redacted] about her case, or if he ever threatened [redacted] in exchange for the photographs. Deputy Puleo answered he had not for both instances. Sgt. Percy asked if there were instances when [redacted] would contact him to ask about her case. Deputy Puleo stated he did not remember her doing so and stated the main purpose of their conversations was "dumb flirting". He went on to say he did not recall anything professional about their conversations and he did not recall any professional conversation about either a restraining order or child custody transitioning into a flirtatious conversation.

Deputy Puleo stated [redacted] never indicated to him that she was uncomfortable with their communication, she never asked him to stop communicating with her, and he recalled [redacted] initiated their contact because she had his business card, and he did not have her phone number. Deputy Puleo confirmed he did not recall exactly why [redacted] initially contacted him. He went on to say he was sure it didn't start out unprofessional, rather it transitioned from professional to unprofessional. He explained it by providing a hypothetical situation where their communication must have started out like, "hey, thanks for all your help", but he wasn't sure. He did not remember their conversation starting out with [redacted] offering him explicit photographs of herself, rather it got to that point "somehow", he just wasn't able to explain how it happened.

At this point in the interview, I realized Deputy Puleo's statement was inconsistent. I brought to his attention that earlier in the interview he acknowledged there was a transition, but then he stated his communication with [redacted] was strictly for flirting, which caused some confusion for Sgt. Percy and me. Deputy Puleo stated "yeah, no I, yeah", but he then paused. Mr. Foley interjected and stated what Deputy Puleo was getting at was, he just didn't remember the specifics of how "it went there", due to the time that had elapsed. I then confirmed Deputy Puleo's statement that his conversation with [redacted] was strictly flirtatious was inaccurate. Deputy

Puleo changed his statement to, his conversation with [redacted] was "mostly" for flirtatious reasons. Sgt. Percy confirmed Deputy Puleo did not recall any non-flirtatious conversation with [redacted].

Sgt. Percy confirmed with Deputy Puleo that Sgt. Toney contacted him and told him he needed to collect his department-issued cell phone. He also attempted to confirm Sgt. Toney directed Deputy Puleo to not delete any content. Mr. Foley confirmed there were no allegations of insubordination or destroying evidence, to which Sgt. Percy agreed. Deputy Puleo was not able to recall if Sgt. Toney instructed him not to delete any content. He again admitted he did delete the last text thread between him and [redacted], and he deleted [redacted] contact. Sgt. Percy attempted to clarify if Deputy Puleo deleted the text thread before or after Sgt. Toney's directive. Deputy Puleo again stated he did not remember if Sgt. Toney told him not to delete anything, but if he did, Deputy Puleo was pretty sure he had deleted the content prior to Sgt. Toney's directive.

I asked Deputy Puleo if Sgt. Toney asked for the phone on the same day [redacted] complaint was called into Sgt. Toney. Deputy Puleo stated it was not on the same day and stated it was a "few days to a week" after the complaint. Sgt. Percy confirmed Sgt. Toney responded to his house to collect his cell phone.

Sgt. Percy confirmed Deputy Puleo did not have any involvement in [redacted] criminal case, other than arresting her. He then asked Deputy Puleo if he was aware of the Sonoma County Sheriff's Office Policy regarding inappropriate relationships or conduct including contacts sexual in nature with victims, witnesses and suspects in cases being investigated or prosecuted, or as the result of any official contact. Deputy Puleo stated he was not. He stated he could assume but he had never read a policy that stated that. Sgt. Percy asked Deputy Puleo to explain what he meant when he said he could assume. Deputy Puleo explained he was able to identify unprofessional behavior and he admitted his conduct was unprofessional and inappropriate, so whether there was a policy or not, he knew he was being inappropriate and he was not surprised there was a policy containing that specific wording.

Sgt. Percy asked Deputy Puleo if he had ever contacted any other victims, witnesses, or suspects in an unprofessional capacity, specifically utilizing his department-issued cell phone, as a result of an investigation. Deputy Puleo stated he did not believe so. Sgt. Percy then asked Deputy Puleo who "Crash" was in his phone. Deputy Puleo responded, "Hmm, ah, it's a, I was wondering what I had that saved under, um, a female that called in, a hit-and-run that didn't end up being a hit-and-run at Wal-Mart." He explained the female (Crash) asked for his card, which he provided to her, and they began texting. Deputy Puleo did not know when exactly he was texting with "Crash", but believed it was around the same time as when he was communicating with [redacted]. He believed his text conversation(s) with "Crash" occurred after his conversation(s) with [redacted], but he was not positive. Deputy Puleo confirmed he responded in-person when he investigated the traffic collision involving "Crash", but he did not take a report. Sgt. Percy asked Deputy Puleo if he knew "Crash's" name. Deputy Puleo stated he did not.

Deputy Puleo told Sgt. Percy "Crash" contacted him after he provided her with his business card. He explained he didn't specifically recall but believed "Crash" reached out to him via text message, she told him she found him attractive, and she asked if he was single. Deputy Puleo did not recall if this initial text message conversation occurred while he was on-duty or not. He also admitted the only phone he used to communicate with "Crash" was his department-issued cell phone. Deputy Puleo told Sgt. Percy none of his communication with "Crash" was professional, in the sense it never had anything to do with her collision.

Sgt. Percy asked Deputy Puleo if "Crash" ever sent him photographs to his cell phone. Deputy Puleo stated she did, but he could not recall how many. He estimated approximately three but wasn't sure. He was only able to describe one of the photographs "Crash" sent him, which depicted her in the shower, exposing her bare chest. Deputy Puleo did not recall if he ever requested "Crash" send him photographs or not.

During follow-up questioning, I asked Deputy Puleo if he believed his conduct regarding these instances was appropriate. He admitted it was not. I asked him if he was able to explain why he engaged in the conduct. He responded by explaining why he used his work phone. He stated his personal cell phone was connected to his laptop computer at his residence, so he didn't want his wife "to see 'em", indicating he did not want his wife to see either the text messages and/or the photographs he and either [redacted] or "Crash" were exchanging.

I confirmed with Deputy Puleo he couldn't recall if he ever requested [redacted] send him photographs. He replied by telling me other than the last instance, where he asked [redacted] if she had any more "material", he could not remember doing so. I asked him what his intent was when he asked her for "material". He told me his intent was for her to send him another photograph of herself "for some unknown reason, I don't know why I would need a picture or anything." I confirmed he remembered that instance but couldn't remember sending any other requests prior to that. I then asked Deputy Puleo if, during the flirting he was partaking in with [redacted], she could have interpreted his words to mean send him photographs. He replied, "yes." I asked him why he could remember two of the photographs [redacted] sent him, to the point he was able to describe them, but he could not remember the other photographs she sent him. He told me he didn't know, possibly because he liked them more than the others.

Sgt. Percy asked Deputy Puleo if he had any other information he wanted to share regarding this investigation. Deputy Puleo paused, then admitted his conduct was inappropriate, he wasn't upset with anyone other than himself, he stated this was a huge mistake and a lesson he would learn from. He took responsibility for his conduct and stated he was ready to "deal with whatever I need to."

Sgt Percy asked Deputy Puleo if he recalled any other requests, regarding sending photographs, with anyone else besides [redacted] and "Crash". Deputy Puleo stated he did not recall having any other requests.

Mr. Foley confirmed [redacted] never asked Deputy Puleo to stop texting him, nor did Deputy Puleo feel like [redacted] ever sent a text or photograph to Deputy Puleo she didn't want to. He also confirmed Deputy Puleo never coerced [redacted] and he confirmed there was not a "quid pro quo" situation, where Deputy Puleo would help [redacted] with her case in exchange for her sending him photographs.

Mr. Foley then asked Deputy Puleo about deleting the text messages. He asked if Deputy Puleo had deleted the initial text messages prior. Deputy Puleo stated he had because, regardless of work, it was wrong, and he didn't want it on his phone. He also stated he did not have a different reasoning for deleting the text messages after he learned of the complaint, other than he just hoped the entire ordeal was over. Deputy Puleo also confirmed he realized he was not deleting anything from existence and was under the impression deleted text messages could be restored. Mr. Foley did not have any more questions.

Before ending the interview, I confirmed Deputy Puleo was in possession of his phone for the entirety of these instances and he had never given anyone else permission to use his phone.

On February 23, 2023, after Deputy Puleo's interview, Sgt. Percy and I discussed this investigation with Lt. Jones and Sheriff Engram, who happened to enter the Professional Standards office. After hearing the information gathered during the interview, Sheriff Engram ordered Deputy Puleo be placed on Administrative Leave.

I completed the Administrative Leave notification form, I called Deputy Puleo and had him return to the Sheriff's Main Office. I met with Deputy Puleo in the secured parking lot at the Sheriff's Main Office, where I served him with the Administrative Leave form and explained the contents of the form to him. Once Deputy Puleo had an opportunity to review the form, he signed it. I provided him with a copy of the form.[7] I also took possession of his Sheriff's proxy card and his department-issued firearms (pistol and shotgun). I secured the firearms in the Sheriff's Office Armory at the Main Office.

On March 20, 2023, I reviewed the BWC footage associated with Windsor Police Department case number WI220[redacted]. Deputy Puleo had two BWC videos labeled under this case number. Deputy Puleo's BWC video labeled "JP1" consisted of him interacting with [redacted] while taking the initial Domestic Violence report. [redacted] was never seen in this video. Deputy Puleo was professional with [redacted] throughout the entirety of this video.

Deputy Puleo's BWC video labeled "JP2" consisted of him contacting, arresting and transporting [redacted] to the Sonoma County Main Adult Detention Facility. Deputy Puleo was professional in his interactions with [redacted] throughout the entirety of this video.

[7] A copy of Deputy Puleo's Administrative Leave form can be found in Exhibits.

Deputy McGoon's BWC video consisted of him standing by with [redacted] while Deputy Puleo interviewed a potential witness. Deputy McGoon then escorted [redacted] to Deputy Puleo's patrol vehicle, he searched her, he had her sit in the back seat, and he secured her seatbelt. Deputy McGoon was professional in his interactions with [redacted] for the duration of this video.

On March 20, 2023, I used the TLO search database to search the phone number [redacted], which was stored in Deputy Puleo's department-issued cell phone under the contact name "Crash". I found the number was associated with only one person, identified as [redacted]

When reviewing the information from Deputy Puleo's cell phone, I recalled a photograph sent to Deputy Puleo via text message from a different number [redacted] This photograph depicted [redacted] California Driver's License and [redacted] insurance information. The photograph of these two documents were sent to Deputy Puleo on February 26, 2022, at approximately 1218 hours.

I searched the Sonoma County Public Safety Consortium Data Analysis (DAT) database for all events occurring in the Town of Windsor around February 26, 2022, at approximately 1218 hours. I found a call for service on February 26, 2022, at approximately 1150 hours (Event #WI2205[redacted]), which was listed as a hit and run.[8] The caller's name listed in the event details was [redacted].

After reviewing the event, I learned [redacted] called to report someone's vehicle had collided with her vehicle while it was parked in the parking lot. Deputy Puleo was the responding officer. Through the course of his investigation, Deputy Puleo was able to contact the suspect and the call was cleared "RESOLVED" after both parties exchanged contact and insurance information.

On March 23, 2023, Sgt. Dylan Fong and I conducted a recorded interview with [redacted][9] This interview took place at a table in front of The Pharmacy, located at 990 Sonoma Avenue in Santa Rosa, CA. This location was at [redacted] request, as the interview occurred on her lunch break and was away from her place of employment. I have reorganized this interview for clarity.

[redacted] told me she first met Deputy Puleo in February of 2022 because he was the investigating officer of a collision involving her vehicle, which occurred in the parking lot of the Wal-Mart in Windsor. [redacted] told me Deputy Puleo provided his business card to her at the end of his investigation and told her to contact him if she needed any further assistance. [redacted] wasn't sure if Deputy Puleo had provided her with his personal or his department-issued cell phone number, but she assumed it was his work cell phone because the number was printed on his business card.

[8] A printout of Event #: WI2205[redacted] can be found in Exhibits.
[9] A copy of [redacted] interview can be found in Exhibits.

[redacted] admitted, soon after the collision, either later the same day or within a few days after, she reached out to Deputy Puleo first. She sent Deputy Puleo a text message saying, "thank you". [redacted] admitted she may have been inappropriate, but she also asked Deputy Puleo if he was single. Deputy Puleo told [redacted] he was "engaged".

[redacted] told me she and Deputy Puleo communicated consistently for a few weeks. The nature of their conversation included photographs sent between them and plans to meet up a few times; however, those plans never came to fruition. She told me she did not remember any videos exchanged between the two of them.

[redacted] explained she did not remember who sent the first photograph. She stated she remembered sending Deputy Puleo between three and ten photographs. She described approximately five of the photographs were sexually explicit, approximately three of which depicted her bare chest. She told me Deputy Puleo asked her to send him photographs of herself; however, he did not ask every time a photograph was exchanged. There were instances she sent him photographs on her own accord. I asked [redacted] if Deputy Puleo ever asked her to send her photographs depicting a specific body part or asking her to pose in a certain manner. She told me he did not and confirmed Deputy Puleo's request for photographs was more of a general request. I asked [redacted] why she sent Deputy Puleo photographs of herself, some of which were sexually explicit. She told me because she was single, and for attention.

[redacted] remembered Deputy Puleo sending her between three and eight photographs. She recalled at least one of the photographs Deputy Puleo sent her depicted Deputy Puleo in his uniform and she remembered at least one of the photographs depicted his chest; however, that specific photograph did not show his face. She confirmed Deputy Puleo never sent a photograph of his genitalia to her. She told me there were instances where she asked Deputy Puleo to send her photographs and there were instances were Deputy Puleo sent her photographs on his own accord.

[redacted] told me her communication with Deputy Puleo was personal, the communication was "flirtatious", and she considered portions of their communication as 'sexting'. [redacted] told me most of her communication with Deputy Puleo was via text message; however, they did speak on the phone approximately three times. [redacted] confirmed she only had one phone number for Deputy Puleo, which was the only number she used to contact him. She also confirmed she no longer had Deputy Puleo's contact information stored in her phone, which she proved by searching Deputy Puleo's first and last name and showing me the results, showing there was no contact under either "Jordan" or "Puleo".

I asked [redacted] if she knew if Deputy Puleo was on-duty at times when they communicated and/or exchanged photographs with each other. She told me she was certain he was because he would tell her he was at work during their communication. She told me there were times they would communicate for "a few hours" while he was on-duty.

[redacted] told me Deputy Puleo initiated making plans to meet in-person; however, they never actually met in person. The only time she saw Deputy Puleo in-person was at the initial traffic collision at the Windsor Wal-Mart. She estimated Deputy Puleo solicited her to meet with him three or four times during their communication. She described Deputy Puleo would tell her he was getting off work at a certain time and would ask her to meet him at a certain location. I asked [redacted] where they planned on meeting. She told me they planned to meet at each other's vehicle. I asked [redacted] if she had any idea as to what was going to transpire if they met at either of their vehicles. She told me, "Something physical", which she described as "making out".

I asked [redacted] if Deputy Puleo ever expressed wanting a sexual relationship with her. She told me, based on their conversations, she believed Deputy Puleo was sexually attracted to her, so her answer was "yes". She could not recall any specific conversation with Deputy Puleo, where they specifically spoke about meeting up to have sex. Later I asked [redacted] directly if Deputy Puleo ever specifically asked her to meet with him to have sex. She told me he did not. I then asked if Deputy Puleo ever specifically asked her to meet with him to engage in other sex acts. She told me she didn't know how to answer that question, because their conversation was 'sexting' and was flirtatious. She said if she had to guess, she would say "yes". I explained I didn't want her to guess, rather tell me if it were possible, or if she couldn't remember. She told me it was possible.

[redacted] told me it had been over a year since she last communicated with Deputy Puleo. She told me the communication just stopped and she could not recall who stopped their conversation. She wasn't sure of the reason; however, it was her assumption Deputy Puleo's fiancé caught him texting her, which caused him to stop.

[redacted] confirmed other than the initial collision in the Windsor Wal-Mart parking lot, she was not the victim, suspect, reporting party, involved other, defendant or plaintiff in any court case or law enforcement contact.

[redacted] confirmed Deputy Puleo never threatened or promised anything in exchange for her sending the photographs and/or having any communication with him throughout the duration of their communication. [redacted] also confirmed, knowing Deputy Puleo was a peace officer, she never felt threatened, coerced, or forced to send Deputy Puleo any text message or photograph. She described her communication with Deputy Puleo was mutual and consensual.

[redacted] told me she no longer had the text message thread with Deputy Puleo, and she no longer had the photographs she sent Deputy Puleo.

Sgt. Fong asked [redacted] if Deputy Puleo's conduct put the Sheriff's Office "in a bad light". [redacted] believed it did because his conduct was unprofessional, but she was aware it went both ways because she contributed to the messages as well.

Sgt. Fong confirmed [redacted] never felt obligated to send Deputy Puleo photographs because of his position.

Sgt. Fong asked [redacted] if she knew Deputy Puleo was on-duty when he asked her to meet in-person. She believed he was once or twice because she knew he was in the Windsor area, and she knew he worked in Windsor.

[redacted] did not have any other information to add when given the opportunity to add anything else she felt may be important to this investigation.

On March 30, 2023, I completed a review of all the text message threads remaining on Deputy Puleo's department-issued cell phone. After reviewing approximately 151 text message threads remaining on Deputy Puleo's department-issued cell phone, I did not observe any other text message conversations where Deputy Puleo received or solicited any photographs or videos sexual in nature. During this review, I did locate one additional concerning text thread.

This text thread was between Deputy Puleo and a contact listed as "[redacted]" in his phone. The text thread appeared to span two days, between September 2, 2022, and September 3, 2022. Below is a summary of this text thread:

Deputy Puleo began the thread when he text-messaged [redacted] and provided her his cellphone number. He wrote, "Hey [redacted], it's Deputy Puleo (the gentleman). Just wanted to let you know this is my cellphone in case she shows up. I left a voicemail for her". According to the text, the initial purpose of providing his phone number to [redacted] appeared to be professional in nature, because Deputy Puleo mentioned the name '[redacted]' and later he asked [redacted] "Did she get her stuff?".

[redacted] and Deputy Puleo discussed his work schedule and then the conversation began to transition away from professional when they began texting about [redacted] work and Deputy Puleo's past jobs before becoming a deputy sheriff. [redacted] sent text messages about Deputy Puleo being handy and not just being a "pretty face". Deputy Puleo stated he's been told he's good with his hands and told [redacted] he was thinking about starting a "side gig" as a masseuse. During the conversation, they discussed dating, and how hard it was for a woman to find a man. [redacted] agreed, at which point Deputy Puleo told [redacted] he was "off the market" and unavailable, which was too bad because he saw "more and more need for real men".

[redacted] told him to work in a spa, but Deputy Puleo persisted he wanted his new venture to be a side gig. They joked about Deputy Puleo not doing business in Windsor and Deputy Puleo asked [redacted] directly, if she wanted to help him "practice" for his side gig. [redacted] responded with a photo (unable to download). [redacted] invited Deputy Puleo to come in for a beer and told him he and his "comrades" could be her guests. She sent another photograph (unable to download).

On September 3, 2022, [redacted] sent a photograph (unable to download) at approximately 0842 hours. Later in the day, she told Deputy Puleo she was baking cookies, she wanted to bring some to the "station", and they coordinated [redacted] dropping off the cookies.

After receiving the cookies, Deputy Puleo sent a text to [redacted] about how good the cookies were and he told [redacted] "And all do respect, you looked amazing" and "let me know if I can do anything else for you". [redacted] indicated she wasn't dressed up but thanked him for his compliment. Deputy Puleo replied, "You looked nice and cool, but quite attractive. Again, all due* respect".

They discussed each other's hair color and Deputy Puleo's heritage. Deputy Puleo then asked about a tattoo he saw on [redacted] back and he asked if she had any more. She described a lower back tattoo and indicated she wanted them removed. Deputy Puleo told her not to remove them and then asked if he could see them. She told him she had no way to take a picture, to which Deputy Puleo responded he could take it for her. [redacted] hinted she was sure he was very capable. He replied, "I think I could get some good shots." This was the last communication between [redacted] and Deputy Puleo.

On March 30, 2023, I searched [redacted] phone number in the DAT database. I identified her as [redacted]. After further investigation, I found Deputy Puleo was the investigating officer of a disturbance call for service on August 31, 2022 (Event #WI222430006).[10] The reporting party was identified as a [redacted], whose phone number was included in a different text thread with [redacted] and Deputy Puleo on Deputy Puleo's work cellphone. [redacted] reported her roommate "[redacted]" had previously given [redacted] until September 2, 2022 to remove her belongings from [redacted] residence; however, [redacted] threated to throw [redacted] belongings away while [redacted] was at work. Deputy Puleo did not pull a case number and cleared the call as "contacted".

On March 30, 2023, I requested Sgt. Fong, who previously worked in the Sheriff's Office Crime Scene Investigations Unit, review the Axiom download of Deputy Puleo's department-issued cellphone. After his review, he told me there was no other inappropriate content located on Deputy Puleo's cellphone.

On March 30, 2023, I reviewed the Patrol Shift Logs and learned the following regarding Deputy Puleo's shifts:[11]

- March 9, 2022 – Deputy Puleo worked 0600-1600 hours

  I confirmed Deputy Puleo's text message conversation with [redacted] occurred on March 9, 2022, between 1356 hours and 1630 hours, which were hours he was on-duty. Deputy Puleo

[10] A printout of Event #: WI222430006 can be found in Exhibits.
[11] Copies of the Patrol Shift Logs for March 9, 2022, Sept. 2, 2022, and Sept. 3, 2022 can be found in Exhibits.

sent a text message to [redacted] at approximately 1434 hours, where he wrote: "You wanna send me another pic?". He received the photograph from [redacted] at approximately 1509 hours. At approximately 1512 hours, he replied, "I feel pretty special. Looks good".

- September 2, 2022 – Deputy Puleo worked 0600-2200 hours
- September 3, 2022 – Deputy Puleo worked 0600-1600 hours

I confirmed Deputy Puleo's text message conversation with [redacted] occurred on September 2, 2022, between 1120 hours and 1518 hours, which were hours he was on-duty.

Deputy Puleo's text message conversation with [redacted] form September 3, 2022, between 1145 hours and 1348 hours, also occurred while Deputy Puleo was on-duty.

On April 4, 2023, I reviewed Deputy Puleo's Policy Acknowledgement Report.[12] I confirmed Deputy Puleo acknowledged Policy Section 320 – Standards of Conduct, on three separate occasions: May 25, 2019, August 1, 2020, and January 14, 2022. I also confirmed Deputy Puleo acknowledged Policy Section 701 – Personal/County Owned Communication Devices, on May 23, 2019.

On April 5, 2023, I met with CSI Sgt. Gary Lawson to determine if Deputy Puleo deleted any text message threads and/or photographs after being directed not to by Sgt. Toney. Sgt. Lawson explained, the Apple iPhone operating system encrypted deleted data; therefore, there was no way to determine if Deputy Puleo deleted any data after being ordered not to.

On April 18, 2023, I conducted a recorded interview with [redacted].[13] [redacted] agreed to speak with me over the phone, which allowed me to record the interview using the Calabrio Call Recording feature on my desk phone at the Sheriff's Main Office. Below is a summary of my interview with [redacted], which I have reorganized for clarity.

[redacted] told me she recalled Deputy Puleo was the deputy who responded to her residence on August 31, 2022, regarding a dispute with her sub-leased tenant. Prior to this incident, she had never met Deputy Puleo. [redacted] did not recall how Deputy Puleo ended up with her phone number, but she confirmed Deputy Puleo reached out to her via text message. She also confirmed, aside from the times Deputy Puleo responded to her residence to deal with the dispute, her conversations with Deputy Puleo were solely via text message, which she still had saved on her phone.

Later in the interview, I asked [redacted] if Deputy Puleo was professional each time he responded to her residence. She replied they were professional encounters, but she believed Deputy Puleo may have responded to her house in-person "one time too many". She explained, Deputy Puleo responded to her residence approximately three times. She indicated it probably wasn't

[12] A copy of Deputy Puleo's Policy Acknowledgement Report can be found in Exhibits.
[13] A digital recording of [redacted] interview can be found in Exhibits.

necessary for him to respond all three times; however, since she was curious, she didn't mind his response and she told me she found Deputy Puleo very helpful. She confirmed Deputy Puleo did not engage in any conduct similar to his conduct in the text thread while he was in-person.

[redacted] told me her conversations with Deputy Puleo started out professional; however, Deputy Puleo transitioned the conversation to "flirtatious" when he offered [redacted] a massage. [redacted] told me she was a single woman, she was interested in Deputy Puleo, and she got the sense he was interested in her when they met in person. Because of her interest, she was admittedly flirtatious with Deputy Puleo as well.

[redacted] recalled a portion of their conversation where Deputy Puleo indicated he wanted to start a side business as a masseuse, and he asked if she wanted to help him practice. She took what Deputy Puleo said as him hitting on her, and she interpreted his conduct in the sense she believed he wanted to "get physical" and was interested in touching her, though not wanting to start a relationship.

[redacted] recalled baking cookies the following day and explained she had extra. Because Deputy Puleo was helpful, and she was a supporter of law enforcement, she wanted to drop the extra cookies off at the Windsor Police Department. After dropping off the cookies, she recalled the text message conversation where Deputy Puleo told her the cookies were good, he commented on her appearance, and told her she was attractive. She also recalled discussing hair color, heritage, and tattoos via text message with Deputy Puleo.

[redacted] stated Deputy Puleo asked her to send him photographs of her tattoos, but never asked for sexually explicit photographs. She told me she does not send "selfies" and confirmed she never sent Deputy Puleo a photograph of herself. She also told me Deputy Puleo did not send her photographs of himself.

[redacted] told me other than the instances where Deputy Puleo responded to her house and when she dropped off the cookies to the Windsor Police Department, she never met with Deputy Puleo in-person, and he never asked her to meet in person. She was under the impression Deputy Puleo was on-duty when he was text messaging her because she recalled him telling her he would be off work at a certain time.

I asked [redacted] if Deputy Puleo ever indicated he wanted to engage in a sexual relationship with her. She replied, "yes". She explained when Deputy Puleo told her he was "unavailable", but then offered her a massage, she interpreted that as he wanted to start with a massage, then see how far he could take it.

[redacted] stated she was never coerced, threatened, bribed, or felt obligated to engage in the text message conversation with Deputy Puleo, and he never made any promises to her to get her to engage in the text message conversation. [redacted] repeatedly told me it was not uncommon for

her to get hit on. She did take Deputy Puleo's persistence as him hitting on her, but she was not offended by it.

[redacted] told me she only communicated with Deputy Puleo over the course of a few days. Their communication ended when she stopped responding to Deputy Puleo's text message. She confirmed Deputy Puleo never reached back out to her and she never initiated another conversation with him.

I asked [redacted] if Deputy Puleo's conduct, coupled with the fact he was a peace officer, brought any discredit to the Sheriff's Office. She admitted she was probably more understanding than most and stated, "yes and no". She said, Deputy Puleo probably should not be conducting himself the way he did, especially if he was married, but she understood that wasn't a "sheriff-specific" thing. She told me Deputy Puleo's conduct would not dissuade her from calling the Sheriff's Office for any reason and she still had faith in the Sheriff's Office.

After my interview with [redacted] she emailed me the three images from her and Deputy Puleo's text thread, which I was unable to download from Deputy Puleo's work cell phone. I confirmed none of the images were sexually explicit. Two of the images were regarding a local fraternal organizations calendar and a public safety night, the third image was of [redacted] roommate's belongings in [redacted] garage.

On April 19, 2023, I reviewed Deputy Puleo's BWC from the August 31, 2023 incident involving [redacted].[14] During my review, I did not observe any inappropriate or unprofessional conduct from Deputy Puleo.

Based on [redacted] statement that Deputy Puleo responded to her residence approximately three times, I searched for more associated BWC videos generated by Deputy Puleo, regarding his responses to [redacted] residence. I searched from August 31, 2022 to September 5, 2022.

I was able to locate one more video associated with [redacted].[15] The video was recorded on September 2, 2022, and was associated with Event # WI2224[redacted], which was listed as a Civil Standby.[16] After reviewing this video, I determined Deputy Puleo was professional and did not partake in any inappropriate conduct with [redacted] while he was in-person with her.

[14] A copy of Deputy Puleo's BWC Video can be found in Exhibits titled: Dep. Puleo-[redacted] 8-31-22.
[15] A copy of Deputy Puleo's BWC Video can be found in Exhibits titled: Dep. Puleo-[redacted] 9-2-22.
[16] A printout of Event #: WI2224[redacted] can be found in Exhibits.

SONOMA COUNTY SHERIFF'S OFFICE
INTERNAL AFFAIRS INVESTIGATION
23-C-0001

CONCLUSIONS AND FINDINGS



DEPUTY JORDAN PULEO

Date of Hire: 2/21/2017

Last Two Evaluations:

June 30, 2021 – June 30, 2022: Exceeds Standards

June 30, 2020 – June 30, 2021: Exceeds Standards

Regarding the allegation Deputy Puleo established or maintained an inappropriate personal relationship, as a result of an investigation, with a known victim, witness, suspect, or defendant while a case is being investigated or prosecuting, or as a direct result of any official contact, this internal affairs investigation identified three separate instances where Deputy Puleo engaged in this conduct.

The first instance involved [redacted]. Deputy Puleo admitted to arresting [redacted] for Domestic Violence on January 27, 2022. While at the jail, during the booking process, Deputy Puleo provided [redacted] with his business card, which had his department-issued cell phone number printed on it. After [redacted] was released from jail, she initiated contact with Deputy Puleo. At first, the communication between [redacted] and Deputy Puleo was professional; however, the communication transitioned from professional to inappropriate, when, according to [redacted] during their conversations, Deputy Puleo made a comment about her appearance, specifically regarding wanting to see her buttocks without clothes on.

For approximately one month, Deputy Puleo and [redacted] text-messaged each other, often while Deputy Puleo was on-duty. Most of the content of their communication over this time frame was unprofessional and inappropriate. According to [redacted] Deputy Puleo requested [redacted] send him sexually explicit photographs of herself, posed in a certain manner. Deputy Puleo admitted to asking [redacted] for "material", which he intended to be photographs of [redacted] but could not recall asking [redacted] to pose in a particular manner.

While attending an out-of-county training, Deputy Puleo admitted to discussing being out of town, having a hotel room and possibly having [redacted] meet him. During his internal affairs interview, Deputy Puleo denied he intended to have sexual intercourse with [redacted] however, he admitted he was pushing the limit, to see how far he could take it with her.

The second instance involved [redacted]. Deputy Puleo admitted he first contacted [redacted] at the scene of a traffic collision at the Windsor Wal-Mart, where he was the investigating

officer. At the conclusion of this collision investigation, [redacted] asked for Deputy Puleo's business card. Deputy Puleo provided [redacted] with his business card, which had his department-issued cell phone number printed on it.

Sometime after the collision, [redacted] text messaged Deputy Puleo, at which time she asked Deputy Puleo if he was single. From that point on, for approximately two weeks, [redacted] and Deputy Puleo engaged in a consensual but inappropriate text message conversation. During this conversation, [redacted] sent between three and ten photographs, approximately five of which were sexually explicit, to Deputy Puleo's department-issued cell phone. Also, during their communication, Deputy Puleo planned to meet-up with [redacted] in-person; however, those plans never came to fruition.

The third instance involved [redacted], in which Deputy Puleo engaged in a text message conversation after meeting through Deputy Puleo's official capacity as a deputy sheriff. [redacted] was an "involved other" in a disturbance call for service. After clearing the call, Deputy Puleo text messaged [redacted] and provided her with his department-issued cell phone number. For approximately two days, the content of their text message conversation included, aside from being a deputy sheriff, Deputy Puleo discussing wanting to be a masseuse and inquiring if [redacted] would help him "practice". They also discussed dating, Deputy Puleo's heritage, Deputy Puleo told [redacted] she was attractive after she dropped off cookies to the Windsor Police Department, Deputy Puleo asked [redacted] if he could see her tattoos, and he told her he would photograph them for her.

Based on the totality of the circumstances, this investigation revealed Deputy Puleo established an inappropriate relationship with [redacted] who was identified as Deputy Puleo's suspect and arrestee from a Domestic Violence case he investigated, which he maintained for approximately one month. Deputy Puleo established an inappropriate relationship with [redacted] who was identified as a victim in a traffic collision Deputy Puleo investigated, which he maintained for approximately two weeks. Deputy Puleo also established an inappropriate relationship with [redacted] who was identified as an involved other in a civil dispute he investigated. This relationship only lasted for two days; however, the content of the text messages he sent to [redacted] was inappropriate.

For the reasons stated above, the finding for this allegation should be **sustained.**

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT, AND RESPONSIBILITY

3. Obey Policies and Procedures: Members shall obey and carry out all lawful Sheriff's Office policies, procedures, and other order whether written or oral. Specifically:

> **Policy 320.5.4 (c) – Standards of Conduct – Relationships** – Establishing or maintaining an inappropriate personal or financial relationship, as a result of an investigation, with a known victim, witness, suspect, or defendant while a case is being investigated or prosecuted, or as a direct result of any official contact.

Finding: SUSTAINED

During Deputy Puleo's internal affairs interview, while discussing his conduct with [redacted] Deputy Puleo made a statement indicating his conversation with [redacted] was strictly flirtatious. I recognized that statement contradicted a previous statement he made, where he admitted his conversation with [redacted] started out professional, then transitioned to a flirtatious conversation. I confronted Deputy Puleo with this inconsistency, at which point Deputy Puleo began to respond; however, his attorney interjected by saying Deputy Puleo just couldn't remember how the conversation transitioned. Deputy Puleo ultimately changed his statement to, his conversation with [redacted] was "mostly" flirtatious.

After discussing his conduct with [redacted] Sgt. Percy asked Deputy Puleo if he had "communicated with any <u>other</u> suspects, victims, witnesses in an unprofessional…capacity, utilizing your issued cell phone, as a result of your investigation?". Deputy Puleo responded, "I don't believe so."

Sgt. Percy proceeded to ask Deputy Puleo who "Crash" [redacted] was in his phone. Deputy Puleo's response was, "Hmm, ah, it's a, I was wondering what I had that saved under, um, a female that called in, a hit-and-run that didn't end up being a hit-and-run at Wal-Mart."

Deputy Puleo's response was focused on the fact he had forgotten what he had saved [redacted] contact information under, rather than forgetting his entire contact with her. It was apparent, when confronted about [redacted] Deputy Puleo immediately remembered her, and he ultimately admitted to engaging in an inappropriate text message conversation with her as well.

This investigation determined "Crash" was identified as [redacted], who called in a "hit-and-run" when her vehicle was struck in the Wal-Mart parking lot in Windsor. Deputy Puleo was the investigating deputy who responded. Based on the information in the call, [redacted] was in-fact a victim of a hit-and-run; however, Deputy Puleo was able to locate the suspect, who ultimately exchanged information with [redacted] therefore no report was taken. Regardless of whether [redacted] was a "victim" or not, Deputy Puleo established and maintained a relationship with [redacted] to the point he asked for and received sexually explicit photographs from her, and

he was able to establish and maintain that relationship as a result of an investigation and/or through his official contact with [redacted]

After discussing his conduct with [redacted] Deputy Puleo was given another opportunity to disclose if he had engaged in similar conduct with anyone else. Deputy Puleo stated he did not recall engaging in similar conduct with anyone else.

During his interview, even though he was given two opportunities to disclose his interaction with [redacted] Deputy Puleo failed to do so. [redacted] was identified as a third female he met during the course of his duties. This investigation determined [redacted] was at minimum an "involved other", and could arguably have been identified as a suspect, in the disturbance Deputy Puleo investigated between [redacted] and her unofficial roommate. At the conclusion of his investigation involving [redacted] Deputy Puleo engaged in an inappropriate text message conversation with her. Specifically, he asked her if she was willing to help him practice his massage venture, commented on her appearance, told her she was attractive, asked to see her tattoos, and offered to photograph them.

A preponderance of the evidence suggested Deputy Puleo engaged in very similar conduct with [redacted] and [redacted] as he did with [redacted] however, regarding [redacted] he attempted to deny engaging in similar behavior until Sgt. Percy asked him directly. Regarding [redacted] he completely failed to disclose his conduct involving her.

Furthermore, though Deputy Puleo was honest about deleting [redacted] contact and the remaining text thread he had with her, the fact he deleted the thread indicated he attempted to destroy, or at minimum withhold, potentially incriminating evidence.

For these reasons, a preponderance of the evidence from this investigation determined Deputy Puleo gave a false statement and omitted material information to Sgt. Percy, who was acting as a designee of the Sheriff in conjunction with this internal affairs investigation; therefore, the finding should be **sustained**.

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT, AND RESPONSIBILITY

3. **Obey Policies and Procedures:** Members shall obey and carry out all lawful Sheriff's Office policies, procedures, and other order whether written or oral. Specifically:

Policy 320.5.8 (c) – Standards of Conduct – Performance - Failure to participate in, or giving false or misleading statements,

or misrepresenting or omitting material information to a supervisor or other person in a position of authority, in connection with an investigation or in the reporting of any office related business.

Finding: SUSTAINED

This investigation revealed Deputy Puleo's conduct, whether on or off-duty, did bring discredit to the Sheriff's Office. During her interview, [redacted] stated she felt obligated to engage with Deputy Puleo, because of Deputy Puleo's position in law enforcement. [redacted] admitted she felt disgusting after engaging in the conversation with Deputy Puleo and stopped communicating with him. She admitted she was partially responsible for the direction the conversation with Deputy Puleo went; however, she also admitted there was a point when Deputy Puleo had no legitimate reason to be contacting her.

During [redacted] interview, she clearly stated she believed Deputy Puleo's conduct brought discredit to the Sheriff's Office because his conduct was unprofessional, albeit she admitted the conversation was consensual and she took some level of responsibility for the content of their communication.

During [redacted] interview, she stated Deputy Puleo's conduct did not bring discredit to her personally; however, she admitted Deputy Puleo probably shouldn't be conducting himself in the way he did with her. She admitted she was probably more understanding than most.

For the reasons stated above, the finding for this allegation should be **sustained.**

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT, AND RESPONSIBILITY

3. Obey Policies and Procedures: Members shall obey and carry out all lawful Sheriff's Office policies, procedures, and other order whether written or oral. Specifically:

Policy 320.5.8 (i) – Standards of Conduct – Performance - Any act on or off-duty that brings discredit to this office.

Finding: SUSTAINED

There were two specific policy sections applicable to the allegation Deputy Puleo used his department-issued cell phone inappropriately. The first was policy section 701.6(a), which stated in essence, members may not use their devices to conduct personal business while on-duty, except for the purposes of brief personal communications.

During [redacted] interview, she stated she recalled text messaging Deputy Puleo while he was on-duty. During [redacted] interview, she also stated she recalled text messaging Deputy Puleo while he was on-duty, and even stated they would sometimes text message each other for hours while he was at work. During his internal affairs interview, Deputy Puleo admitted he exclusively used his department-owned cell phone to communicate with both [redacted] and [redacted] to conceal his conduct from his wife. Furthermore, he told Sgt. Percy he rarely used his department-issued cell phone while off-duty, which indicated most of his communications with [redacted] and [redacted] took place while he was on-duty.

The second applicable policy section was 701.6(e), which stated in essence, using a personal communication device to harass, threaten, coerce or otherwise engage in inappropriate conduct with a third party was prohibited. This investigation revealed [redacted] and [redacted] engaged in flirtatious conversations and they both sent Deputy Puleo sexually explicit photographs to his department-issued cell phone via text message. This investigation also revealed Deputy Puleo engaged in a third, flirtatious and inappropriate text message conversation with [redacted] in which he discussed him wanting a side job as a masseuse, asking [redacted] if she would help him practice, they discussed the difficulties of dating, they discussed Deputy Puleo's heritage, his hair color, he told [redacted] she was attractive after she dropped off cookies to the Windsor Police Department, he asked if he could see her tattoos, and he told her he would photograph them for her when she told him she couldn't.

There was no apparent professional purpose for either [redacted] or [redacted] to send Deputy Puleo these photographs or partake in the flirtatious conversations they had. Even though Deputy Puleo's conversation with [redacted] started out professional, it quickly transitioned to the point it became flirtatious as well. The facts of this investigation also concluded the conversations Deputy Puleo had with [redacted] and [redacted] occurred while he was on-duty, and those conversations were not only personal conversations, but inappropriate as well. During his IA interview, Deputy Puleo admitted his conduct was inappropriate.

For the reasons stated above, the preponderance of the evidence listed above showed Deputy Puleo violated both policy sections discussed above; therefore, the finding for each section should be **sustained.**

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT, AND RESPONSIBILITY

3. Obey Policies and Procedures: Members shall obey and carry out all lawful Sheriff's Office policies, procedures, and other order whether written or oral. Specifically:

Policy 701.6 – Personal/County-owned Communication Devices

The following protocols shall apply to all PCDs that are carried while on-duty or used to conduct department business.

(a) A PCD may not be used to conduct personal business while on-duty, except for brief personal communications (e.g., informing family of extended hours). Members should not endeavor to limit their use of PCDs to authorized breaktimes unless an emergency exists.

(e) Using PCDs to harass, threaten, coerce, or otherwise engage in inappropriate conduct with any third party is prohibited. Any member having knowledge of such conduct shall promptly notify a supervisor.

Finding: SUSTAINED

RECOMMENDATION:

As a result of this investigation, I learned Sheriff's Dispatch entered specific information into Event # WI2236[redacted], which allowed Deputy Puleo to identify [redacted] as the complainant and determine [redacted] was complaining about him. Based on his ability to determine the complaint was about him, Deputy Puleo was able to review his department-issued cell phone and he admitted to deleting a text thread with Ms. [redacted] before being ordered not to erase anything from his phone and turn it into Sgt. Toney. The text message thread he deleted could have contained potentially incriminating material.

I recommend modifying dispatch's policy and/or procedures when receiving a call for service involving a complaint of Sheriff's Office personnel, to prevent the destruction of evidence in the future.