INTERNAL AFFAIRS INVESTIGATION
17-IA-0005

Sonoma County Sheriff's Office

Internal Investigation Report

INCIDENT TYPE:	DATE OF INCIDENT:	DATE REPORTED:	FILE NUMBER:
Violate State Law— 289.6 (a)(1) PC Standard of Conduct	March 15, 2017	March 15, 2017	17-IA-0005

EMPLOYEE:	DIVISION OR ASSIGNMENT:	WORK LOCATION:
Correctional Deputy Garrett Paulson	Detention Division	MADF

COMPLAINANT:	ADDRESS:
Sonoma County Sheriff's Office	
HOME TELEPHONE:	WORK OR CONTACT TELEPHONE:

SUMMARY OF COMPLAINT:

On March 15, 2017, Correctional Sergeants Grenier and Pitkin interviewed Inmate [redacted] who wanted to report alleged inappropriate behavior between an inmate and a correctional deputy. During the interview, [redacted] advised Sergeants Grenier and Pitkin that on or about March 13, 2017, she observed a correctional deputy (later identified as Correctional Deputy (CD) Garrett Paulson) block the view of cell door R-49, which was occupied by Inmate [redacted], with a storage room door. When the view of the door was blocked, CD Paulson would spend approximately 15 minutes near the door obstructed from the view of others. Inmate [redacted] reported hearing moaning during this time. Inmate [redacted] said this would occur after CD Paulson's partner would leave the module.

Additionally, Inmate [redacted] said CD Paulson appeared to give preferential treatment to Inmate [redacted] and provide her access to things she had never seen a correctional deputy provide to an inmate. CD Paulson also shared personal information with Inmate [redacted] which Inmate [redacted] thought was unusual.

Inmate [redacted] asked Inmate [redacted] about CD Paulson and Inmate [redacted] said CD Paulson was "fine" and made facial gestures suggesting something of a sexual nature occurred between her and CD Paulson. This information was reported to the Detention Division Administration via the chain of command by Sergeant Pitkin.

On March 16, 2017, Domestic Violence/ Sexual Assault Detective Piccinini was assigned to investigate this case.

On March 17, 2017, I was assigned this case by Lieutenant James Naugle to determine if Correctional Deputy Paulson violated Sheriff's Office Rules and Regulations.

DIVISION ASSIGNED:	DATE ASSIGNED:	DATE COMPLETED:
Internal Affairs	March 17, 2017	
INVESTIGATOR: SGT. EDDIE ENGRAM	SUPERVISOR (S) REVIEW: LT. JAMES NAUGLE	

INTERNAL AFFAIRS INVESTIGATION
17-IA-0005

VIOLATION (S):	REVIEWER'S FINDING:	REVIEWER'S FINDING:	REVIEWER'S FINDING:	REVIEWER'S FINDING:
Local, State and Federal Laws	Please Review, make a Finding for each allegation and Electronically Sign in the AIM program prior to tracking it to the next individual listed below.			
Standard of Conduct RULES AND REGULATIONS 5.0., B., 4				
Prohibited Activities On-duty: RULES AND REGULATIONS 5.0., B., 14				
Standard of Conduct RULES AND REGULATIONS 5.0., B., 4				
	Captain Clint Shubel	Captain John Naiman	Captain Mazen Awad	ASH Randall Walker

DISPOSITION:	
SIGNATURE: Sheriff Steve Freitas	DATE:

Background Summary

On March 15, 2017, Correctional Sergeants Grenier and Pitkin interviewed Inmate [redacted] who wanted to report alleged inappropriate behavior between an inmate and a correctional deputy. During the interview, [redacted] advised Sergeants Grenier and Pitkin that on or about March 13, 2017 she observed a correctional deputy (later identified as Correctional Deputy (CD) Garrett Paulson) block the view of cell door R-49, which was occupied by Inmate [redacted], with a storage room door. When the view of the door was blocked, CD Paulson would spend approximately 15 minutes near the door obstructed from the view of others. Inmate [redacted] reported hearing moaning during this time. Inmate [redacted] said this would occur after CD Paulson's partner would leave the module.

Additionally, Inmate [redacted] said CD Paulson appeared to give preferential treatment to Inmate [redacted] and provide her access to things she had never seen a correctional deputy provide to an inmate. CD Paulson also shared personal information with Inmate [redacted] which Inmate [redacted] thought was unusual.

Inmate [redacted] asked Inmate [redacted] about CD Paulson and Inmate [redacted] said CD Paulson was "fine" and made facial gestures suggesting something of a sexual nature occurred between her and CD Paulson. This information was reported to the Detention Division Administration via the chain of command by Sergeant Pitkin.

On March 16, 2017, Domestic Violence/ Sexual Assault Detective Piccinini was assigned to investigate this case.

On March 17, 2017, I was assigned this case by Lieutenant James Naugle to determine if Correctional Deputy Paulson violated Sheriff's Office Rules and Regulations.

Complaint / Authorities

The purpose of this Internal Affairs investigation is to investigate the circumstances surrounding Correctional Deputy Garrett Paulson's conduct/action in regards to his actions and relationship with Inmate [redacted].

RULES AND REGULATIONS REGARDING CONDUCT

5. PROCEDURES

B. DUTIES, CONDUCT AND RESPONSIBILITY

2. Local, State and Federal Laws: Members shall observe, obey and uphold all local, state and federal laws.

Specifically

289.6 (a) (1) PC: an employee or officer of a public entity health facility, or an employee, officer, or agent of a private person or entity that provides a health facility or staff for a health facility under contract with a public entity, who engages in sexual activity with a consenting adult who is confined in a health facility is guilty of a public offense. As used in this paragraph, "health facility" means a health facility as defined in subdivisions (b), (e), (g), (h), and (j) of, and subparagraph (C) of paragraph (2) of subdivision (i) of, Section 1250 of the Health and Safety Code, in which the victim has been confined involuntarily.

(b) As used in this section, the term "public entity" means the state, federal government, a city, a county, a city and county, a joint county jail district, or any entity created as a result of a joint powers agreement between two or more public entities.

(d) As used in this section, "sexual activity" means:

(1) Sexual intercourse.

(2) Sodomy, as defined in subdivision (a) of Section 286.

(3) Oral copulation, as defined in subdivision (a) of Section 288a.

(4) Sexual penetration, as defined in subdivision (k) of Section 289.

(5) The rubbing or touching of the breasts or sexual organs of another, or of oneself in the presence of and with knowledge of another, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of oneself or another.

4. Standard of Conduct: Members shall conduct their private and professional lives in such a manner so as to avoid brining discredit upon the Office.

14. Prohibited Activities On-duty: Members are prohibited from engaging in the following non-exclusive activities while on-duty:

> **n.** Engaging in on-duty sexual relations including, but not limited to sexual intercourse, excessive displays of public affection or other sexual contact.

37. Reporting Illegal Activities or Policy Violations: Members shall report their own actions or transactions, and those of other members, to their manager via chain of command where such actions/transactions may result in criminal prosecution or discipline under this policy.

Investigation

On March 17, 2017,[1] I was asked by Lieutenant James Naugle to conduct this investigation. I was advised the Domestic Violence/ Sexual Assault Unit (DVSA) was completing an investigation against Correctional Deputy (CD) Garrett Paulson regarding possible sexual contact between CD Paulson and Inmate [redacted]. Detective Piccinini completed his investigation and forwarded his investigation to the Sonoma County District Attorney's Office for review. I was asked to delay my own internal investigation until after a charging decision was made by the Sonoma County District Attorney's Office.

On March 17, 2017, Sergeant Berges and Detectives Piccinini and Schmidt interviewed CD Paulson. After the interview CD Paulson was given his IA notice and placed on Administrative Leave.

Based on all the information Detective Piccinini and members of the DVSA Unit collected, they completed a report and sent it to the District Attorney's Office asking that a criminal complaint be filed against CD Paulson.

On March 20, 2017, I received a copy of Detective Piccinini's report. It included copies of all of the recorded interviews completed by DVSA detectives. I had the interviews transcribed. In reviewing the report, I learned the following:

On March 15, 2017, Inmate [redacted] approached Correctional Sergeant Grenier and told him she had witnessed inappropriate behavior by a correctional deputy. Sergeants Grenier and Pitkin interviewed Inmate [redacted] and later wrote the following memorandums[2].

Sergeant Pitkin's Memorandum

> "On March 15, 2017, Sgt. Grenier requested I assist him with an interview of inmate, [redacted], housed in B-Module. He advised me [redacted] was requesting to speak to a Sergeant regarding a staff member and inappropriate behavior she had recently observed while housed in R-Module.
>
> "At approximately 1300 hours, I responded to B-Module and escorted [redacted] to a Contact Visiting booth where Sgt. Grenier met us. Sgt. Grenier introduced us and asked [redacted] what she would like to speak to us about. [redacted] first requested we contact Santa Rosa Police Department Detectives and advise them she wanted to give them information regarding large amounts of "dope" in the Santa Rosa area. We advised her we could contact them and let them know what she was requesting. At the end of the interview she advised us the Santa Rosa area she was speaking of is Hearn and Corby avenues. We advised her we can only make the request and pass on the information.

[1] An underlined date indicates it is a part of my investigation.
[2] Copies of the memorandums can be located in Exhibits.

"[redacted] then advised us that over a two day period at the beginning of this week, while she was housed in R-Module, a young Deputy whose last name began with a "P" was acting "creepy" (Deputy G. Paulson). She described him as taller and thinner with hair shaved on the sides and longer with a wave on top. [redacted] told us she was housed in cell R-48. She told us on day 1, when he was on a round she could hear his boots squeaking around the dayroom and when he would get to cell R-49 the squeaking would stop for longer periods of time before he moved on. She said she got out of bed and began to watch and he would disappear by cell R-49. She said she woke her neighbor in cell R-47, "[redacted]" and told her to watch. She said she wanted to make sure she wasn`t crazy and seeing things. She said it happened again and "[redacted]" saw it too. She said he also takes a long time using his flashlight to make rounds and it is "creepy" how long he looks in a cell. Deputy Paulson was assigned to R-Module on swing shift with Deputy Marlowe as Break One.

"[redacted] stated on Day 2, a "stocky older" Deputy with a mustache and glasses (whose name she could not remember), left for his break. This was Deputy Willis. During that time she said Paulson was on a round and stopped again in front of cell R-49. She said she heard a key sound opening a door or a port and was not sure which. She stated Paulson was in the corner area for approximately 15 minutes and during that time she stated she heard him make a "moaning" sound. She said she got up to go look and she said as she approached her door Paulson popped out from the corner area. She said she believes he heard her shoes. At that same time she stated Deputy Willis was returning from his break. She said she observed the Paulson pop out and shut the door to the storage room that had been opened and blocks the view to the corner area from the desk area.

"[redacted] said both days he was at the cell for a long time during the second shift and while the second Deputy had left for a break.

"[redacted] told us while on out of cell activity she spoke with "[redacted]" housed in R-49. [redacted] said that over the two days the same Deputy gives [redacted] access for things she has never seen here before. She said [redacted] would yell that she wanted to turn the TV channel and he would immediately pop her door so she could do so. [redacted] said she knows [redacted] from the streets and when she spoke to her she made a comment about being let out of her cell and asked her what was "going on" by her cell. [redacted] said [redacted] smiled and made a comment about "him being fine". [redacted] said [redacted] made facial gestures indicating the Deputy had been in the cell doing something of a sexual nature. [redacted] said she knows [redacted] from the streets and commented that "she does those things on the streets too". [redacted] said [redacted] "if you say anything, I will kill you". [redacted] said she then felt sick and not safe in the module. She said she has always felt safe here until this.

"We asked [redacted] if she wanted to press charges against [redacted] for threatening her and she said, "No". She told us she did not want anyone knowing she had talked to us. [redacted] told us she has not told anyone what she observed other than "[redacted]"

since they both observed it together. We asked her if she felt safe in B-Module and she said "yes". We asked her if she wanted to speak to Mental Health Staff and she said "yes". She contracted for her safety. We requested MH Staff Supervisor Benwell respond to Contact Visiting. Benwell spoke with [redacted] and cleared her to be returned to B-Module.

"I returned [redacted] to B-Module and Sgt. Grenier and I advised acting Watch Commander, Lt. Rizzo.

"At approximately 1600 hours, Sgt. Grenier and I escorted [redacted] back to Contact Visiting to conduct a follow-up interview. We advised [redacted] we would be recording our conversation. [redacted] became visibly upset and her body started to shake. She told us she was already uncomfortable with the situation and said she did not want a recording to go back to the Deputy. She told us she had remembered his name and it was Paulson (G. Paulson). We spoke with her about the recording and reassured her there would be no retaliation and the recording would not go to the Deputy. She had tears in her eyes and she said she had no problem speaking with us and answering any follow up questions but she already felt really "creepy" about the whole thing and the recorder made her feel worse. Lt. Rizzo responded and spoke with [redacted] about recording the interview and [redacted] remained adamant she not be recorded. Sgt. Grenier and I continued with the follow up interview with no recording.

"In addition to the above interview [redacted] told us the following:

"Her observation of the interactions between [redacted] and Paulson were the day before yesterday (3/13/17) and the day before that (3/12/17). The time was during the second shift of the day. She stated she remembered Paulson`s name after we took her back from the first interview.

"On 3/12/17, she could hear Deputies boots from her cell bunk when they would walk to conduct a round in the area. At one point she heard the boots stop by the cell past hers. They stopped for approximately 10 minutes and she thought it was "weird" so she got up to look. She could see a small part of Paulson`s back and he was facing [redacted] cell R-49. She said the entire 10 minutes there was no talking. She said he must have heard her and then turned and looked at her then walked away towards the desk.

"On 3/13/17, [redacted] said they had come out for out of cell activity several times during the day. After locking down she heard something and went to her cell door and yelled out to [redacted]. [redacted] came walking out of her cell saying "hey girl" and Paulson was at [redacted] cell door. [redacted] told Paulson she needed to get some tampons. She grabbed tampons and walked back to the cell. As she was going into the cell, [redacted] heard [redacted] mumble to Paulson that they could finish their conversation tomorrow. Paulson closed her cell door. [redacted] said this is

"weird" because she has never seen inmates be allowed out of their cell at their demand so much.

“At some point [redacted] said she heard the boots again and again they stopped. She shares a vent with cell R-47, [redacted], and so she woke [redacted] up and told her they had stopped again. [redacted] said she wanted somebody else to see so she would know she wasn`t crazy. They both went to their cell doors to watch. [redacted] said after approximately 10 minutes Paulson never came out of the cell area. [redacted] said she went back and laid down and heard moaning from that area. She said she thought maybe she was "tripping" so she put stuff in her ears to create ear plugs. She then got up and walked over to her cell window. She said he may have heard her because this time Paulson popped out of the area and shut the janitor closet door that was open. [redacted] said the door opens out and blocks the view of cell R-49 from the dayroom. As he was walking away Deputy Willis walked in with his backpack. She said that is how she knows he was on his break. She had also heard Paulson yell earlier to an inmate that he would take care of something when his partner returned. [redacted] said [redacted] saw everything too.

“During out of cell activity on the second day, [redacted] asked [redacted] in front of other girls what was up with her and "Mr. Hotshit". [redacted] looked at her and said, "Nothing" then walked straight to her and got her alone. [redacted] told [redacted] "Bitch, he is hmmm hmmm and if you say anything to anyone, I will fuck you up". We asked [redacted] if she said she would kill her or fuck her up and [redacted] said [redacted] said fuck you up. [redacted] said the way she was acting indicated there was something of a sexual nature going on like maybe a strip show or she was "getting something". When asked to clarify she said she couldn`t see in the cell but she wasn`t stupid and the whole thing was strange and secretive.

“Later [redacted] told [redacted] she named Paulson "Perve Runner" since [redacted] referred to him as the road runner due to him being in and out of the cell area. [redacted] told [redacted] that wasn`t his name and to change it. [redacted] told [redacted] "he is my runner".

[redacted] said she also observed a long conversation they had when the other Deputy was in the module but she couldn`t remember which day. She said Paulson stood back away from the door and she remembered listening because it was an abnormal conversation. She said it involved personal information that Deputies do not tell inmates. She said [redacted] was asking him if he had a girlfriend and he said he had a girlfriend and they had been together for a while. [redacted] asked Paulson how long he worked there and Paulson told her a couple of years. [redacted] said she has never heard Deputies give out their personal information like that.

[redacted] said [redacted] receives money on the streets for sex. She said in R-Module the mod workers were constantly on [redacted] door. [redacted] said all the traffic in her cell area was annoying. She said she asked [redacted] if one of them was her guy and [redacted] responded with "that`s one of many in here Bitch". [redacted] stated this with the connotation that "bitch" was an accepted term not a derogatory term.

[redacted] added that "[redacted]" in B-Module told her she came from R-Module. [redacted] told [redacted] had brought heroin into the facility at the time of her arrest. [redacted] said [redacted] and the girl that was in R-50 before the one in there now had done all the heroin. [redacted] did not know the other girl`s name. [redacted] said that is why [redacted] told [redacted] she was actually withdrawing now not during the time she was originally booked. [redacted] told [redacted] during this conversation that she had teased [redacted] about Paulson being her boyfriend. [redacted] told us this means other people are seeing what I saw.

"We had medical staff follow up with [redacted] based on a potential withdraw from heroin. Medical staff was advised to not divulge to [redacted] information regarding her possible use of heroin after arrest in this facility.

End of Memorandum

Sergeant Grenier's Memorandum

"On 3/15/2017, I was assigned to work as the Custody Sergeant on day shift at the Main Adult Detention Facility.

"At approximately 1050 hours, I went into B Module to conduct supervisor rounds and walked up to the Deputy`s work station. The module deputy was away from the desk. Inmate [redacted] walked up to the Deputy`s desk and asked to speak with me. [redacted] told me she had information about illegal activity out of custody. [redacted] also told me she witnessed inappropriate behavior by a deputy when she was in R Module and she wanted to tell me about it, but she didn`t want to talk in front of the other inmates.

"At approximately 1315 hours, Sergeant Pitkin brought [redacted] up to contact visiting. Sergeant Pitkin and I interviewed [redacted].

"[redacted] told us she knew about a large amount of drug sales that occurred in the City of Santa Rosa and she wanted to talk to a detective. I told her we would contact a detective on her behalf.

"I asked [redacted] to tell us about what she witnessed in R Module. [redacted] told us the following in summary:

"[redacted] witnessed what she believes is inappropriate conduct by a Correctional Deputy (later identified as Correctional Deputy G. Paulson) on two consecutive days. [redacted] said the incidents occurred on Monday 3/13/17 and Tuesday 3/14/17 during swing shift or Sunday 3/12/17 and Monday 3/13/17 on swing shift. She couldn`t remember the Deputy`s name during the first interview, but is started with the letter, "P." [redacted] described him as white, young, and thin. [redacted] said he had brown hair that was tall and combed back on the top and short on the side.

[redacted] couldn`t remember the name of the other Deputy (Deputy 1) who worked in R Module on the first day, but described him as young.

"[redacted] couldn`t remember the name of the other Deputy (Deputy 2) who worked in R Module on the second day. [redacted] described the Deputy as older and not thin. She said he had a mustache and glasses.
[redacted] said the inappropriate conduct occurred between Deputy Paulson and Inmate [redacted] D#238222 in cell R-49. Cell R-49 is in an alcove.

"[redacted] said she noticed the Deputy was opening [redacted] door several times to change the television, get hot water, etc. [redacted] said she thought it was very unusual.

"On the first day, [redacted] said she heard the sound of boots walking past her door and then the sound stopped. [redacted] said she looked out of her cell window and saw Deputy Paulson leaning on the wall looking towards cell R-49. The janitor`s closet door was open and obscured the view of cell R-49. [redacted] said she told the inmate in cell R-47, [redacted], to look at Deputy Paulson standing in the alcove. After several minutes, Deputy Paulson closed the janitor`s closet door and left.

"On the 2nd day, when Deputy 2 was out of the module on his break, [redacted] heard Deputy Paulson walked over to [redacted] cell. [redacted] said she heard the sound of a lock being opened. [redacted] said the janitor`s closet door was open and it obscured the view of cell R-49. [redacted] said she heard the sound of moaning. [redacted] said she also told [redacted] to look out the window. [redacted] said Deputy Paulson was there for approximately 5-15 minutes. [redacted] said she believes Deputy Paulson heard her make a noise. [redacted] saw Deputy Paulson come out of the alcove. About the same time, Deputy 2 walked back into the module and walked up to the Deputy`s work station. [redacted] said she saw Deputy Paulson come out of the alcove and close the janitor`s closet door.

"[redacted] said she asked [redacted] what happened with Deputy Paulson in front of other inmates when they were on their out of cell activity time. [redacted] said [redacted] pretended to not know what [redacted] was talking about. [redacted] said [redacted] spoke with her alone later during their out of cell activity. [redacted] said if you tell anyone what happened, "I will fuck you up!" [redacted] said they talked about how she found Deputy Paulson attractive and she was smiling. [redacted] said it was obvious to her the relationship between Deputy Paulson and [redacted] was sexual in nature.

"After our first interview, Sergeant Pitkin had Mental Health Staff Benwell speak with [redacted]. [redacted] was returned to B Module after speaking with Mental Health Staff Benwell.

"Sergeant Pitkin and I went and spoke with the Watch Commander Lieutenant Rizzo. We told her about our interview with [redacted].

"At approximately 1615 hours, Sergeant Pitkin brought [redacted] back up to contact visiting for another interview. We attempted to have [redacted] tell us about the incident on an audio recorder. [redacted] refused to let us record her conversation, but she was willing to talk about the incident. [redacted] confirmed the information from the first interview and also told us the following additional information:

"[redacted] said Deputy Paulson was the name of the Deputy that had inappropriate contact with Inmate [redacted]. She said she remembered the name between interviews.

"[redacted] said other inmates would tell [redacted] that her "boyfriend is here" when Deputy Paulson walked into the R-Module.

"[redacted] also said she called Deputy Paulson by the nickname "Perve Runner" because he walked around the module quickly like the cartoon Road Runner, but he was a pervert. [redacted] said she referred to Deputy Paulson as the "Perve Runner" in front of [redacted]. [redacted] became upset and said, "He isn`t the Perve Runner, he is my runner."

End of Memorandum

[redacted]

Inmate [redacted] Interview

On March 16, 2017, Detective Piccinini interviewed Inmate [redacted]. Inmate [redacted] statement to Detective Piccinini was consistent with her statement to Sergeants Grenier and Pitkin.

[redacted]

Inmate [redacted] Interview:

On March 16, 2017, Detective Piccinini interviewed Inmate [redacted]. The following is Detective Piccinini's written report from his interview with Inmate Roth.

"I interviewed [redacted] in the Sonoma county Jail "Contact / Visiting Room" on 03/16/17 at approximately 2108 hours. The interview was recorded and later transferred to a compact disc. The disc was later booked for evidence. [redacted] told me she was booked into the Sonoma County Jail on 03/10/17. While she was in the Sonoma County Jail she was housed in R-Module

cell number 47. I requested [redacted] to draw me a picture of R-Module. I later booked the drawing for evidence. I asked specifically about cells numbered 48, 49, and 50. She questioned why we were talking with her. She stated she was not sure what she actually saw. She stated she was withdrawing from drugs and would be up and down from her bed throughout the night looking out her cell door window. She described the area in question as a hidden area. She said if you were to open the closet door near cell 49 it would block the view of cell 49. I asked her if she knew who was in cell 49 and she said, "[redacted]." She said [redacted] was in cell 48 and a female named [redacted] was in cell 50.

"I asked [redacted] why the closet door would be open. She informed me only C.O.'s have keys to the closet doors. The door is only left open when a mod worker is in the mod. She was under the impression inmates were not even allowed to enter the mod worker closets. [redacted] saw the closet door was left open multiply times when the mod workers were not there. To [redacted] it was unusual for the closets doors to be left open. She believes the doors were open on 03/11 and 3/12. She said C.O. Paulson was the C.O. who opened the closet door.

"[redacted] said sometime after dinner a C.O. went into the closet retrieved a broom from the closet. When he did this he was the only C.O. in the mod. [redacted] identified the C.O. as Correctional Deputy Paulson. Paulson left the door open and did not shut the door until the other C.O. walked into the Mod. This C.O. was later identified as C.O. Marlowe. [redacted] stated she could see into the utility closet but could not see cell number 49 from the angle of her cell. She described Paulson as disappearing several times and "Popping back up" throughout the night. She described Paulson as acting like he was working "Hella hard". [redacted] stated her and [redacted] were taking turns watching out their cell windows because Paulson was acting weird and they would hear cell doors opening, closing, and locking. She described hearing toilets consistently being flushed. She described Paulson as spending a lot of time in the corner of cell 49. She said she knew Paulson and [redacted] flirted a lot more and especially in front of other C.O. `s. She said [redacted] would make statements like "He cares about me or "He is going to put money on my books." [redacted] would say this to an unidentified C.O. in regards to Paulson. [redacted] said it appeared as if [redacted] and Paulson knew each for while based on the way the two were acting towards each other in the unit. [redacted] said Paulson did not appear to provide [redacted] with any extra privileges. [redacted] was unsure if Paulson actually ever put money on her "books". [redacted] stated [redacted] receives monthly checks from the government due to her Native American heritage.

"[redacted] later confronted [redacted] about what was going on between Paulson and her. [redacted] described [redacted] face as becoming flushed and she denied any actions with Paulson. [redacted] stated she never did see Paulson or [redacted] have any physical contact together."

End of Interview

Inmate [redacted] Interview:

On March 16, 2017, Detective Piccinini interviewed Inmate [redacted]. The following is Detective Piccinini's written report from his interview with Inmate [redacted].

"I contacted [redacted] at the Sonoma County Jail in the "Contact / Visiting Room" on 03/16/17 at approximately 2320 hours. I was accompanied by Det. F. Schmidt. I informed [redacted] she was not in trouble.

"[redacted] told me she had warrants for her arrest. She turned herself in on 3/12/17. She was housed in "R- Module" because she was going to withdraw from alcohol and heroin. [redacted] said she was housed in cell number 49 while in "R-mod". I asked her if she knew any of the correctional deputy's names. [redacted] said she remembered some of the correctional deputies while in the R-mod. I asked her, who her favorite correctional deputies were while she was in the unit. She named off two deputies but did not bring up Paulson`s name. She said she constantly yells at the C.O.'s when they walk by her cell. She yells at them in attempt for them to stop and talk to her because she is bored.

"I explained to [redacted] it was the responsibility of the Sheriff`s Office to ensure her safety while she was housed at the Sonoma County Jail. I informed her if she was victimized while housed in the jail that she had rights to an advocate and other services if she was a victim of a sexual assault. She replied, "Ok so we are getting at sexual assault." I informed her we were detectives on the patrol side for the Sheriff`s Office and we investigated domestic violence and sexual assault incidents. [redacted] replied, "Ok so are saying I fucked around with like a C.O. or something." I told [redacted] I was trying to figure out if a "C.O." crossed any lines and took advantage of her. [redacted] began cutting me off saying no. She then said "God people are so fucking stupid." I asked her why she was feeling this way. She said inmates were making rumors because she said Correctional Deputy Paulson was "Hot." [redacted] said she was not a victim of a sexual assault and did not need an advocate. I asked her if she was refusing services because she was in fear, threatened, or anything along those lines and she stated she was not. I told her I was there to help her if she was being victimized. I explained we were willing to assist and protect her if she was victimized. [redacted] again said she was ok. I asked her if she was having an intimate relationship with Paulson. [redacted] said no.

"I informed [redacted] of all the activity logs, door records and OCA records[3]. I also informed her I had the ability to listen to jail phone calls. I informed her I had already talked with several people. I told her I had collected several records. I ensured her she was not in trouble. I was only attempting to determine if the allegation was true or false. [redacted] told me it was not Paulson or any other C.O. She

[3] A copy of these records can be located in Exhibits.

said, "They are pretty professional here." I told her I still had an obligation to investigate the allegation.

“[redacted] began asking how this allegation was reported. She asked if a certain individual had reported the incident. I did not provide her with a direct answer.

“I asked [redacted] if she had a boyfriend and she said yes. She said her boyfriend has been inside the Sonoma County Jail before and he knew most of the C.O.’s. I asked [redacted] she had talked with her boyfriend about C.O. Paulson. [redacted] replied she thought she told her boyfriend that Paulson was attractive.

“I told [redacted] I knew Paulson was spending time with her. She replied they were just talking. The two talked about how he wanted to help people and turn their lives around. He later got [redacted] a bible to help her. She said he was not like other C.O.’s who were not as nice as Paulson. I asked [redacted] why Paulson went into the mod closet. She said he retrieved a bible from the closet for her. I asked her if the door remained open after he retrieved the bible for her. She said Paulson did leave the door open while they talked. She said her port was broken and that was one of the reasons why Paulson opened her door instead of her food port. She was asked how long the door was open for and she said only a few minutes.

“[redacted] began to down play the issue and change the topic by saying if it was a female we would not be investigating the incident. We informed her she was wrong. She then said it was because of who she was and we were blaming her for having a relationship with Paulson. We told [redacted] we were not blaming her. She said well I just don`t want him getting in trouble for something I did. I questioned [redacted] again about how the time the door was open. I also told her it was for two nights in a row. [redacted] replied, "It was not two nights in row." She said you can`t get in trouble for just having a conversation.

“I explained to [redacted] that the records showed her door was open when Paulson was the only C.O. in the unit. I informed her the closet door was open concealing their activity. She replied it does sound bad. I asked her if he took advantage of her she said, "No." I asked her if the two had an intimate relationship and she said, "No." [redacted] then said, "Fucking [redacted] she started this". I asked her who [redacted] was and how she knew [redacted]. [redacted] Knew [redacted] from being in the jail. I asked [redacted] if she could diagram the mod and she did. [redacted] then began naming off people in the mod who were housed around her cell. [redacted] also began explaining how certain people were unable to see what they were doing and the other people in the cells were asleep.

“I asked [redacted] how she thought Paulson was going to do when he took a lie detector test the following day. I informed that, her due to the fact he was an employee of the county, he was required to take lie detector test. [redacted] replied under her breath, "Good luck with that." [redacted] began to become upset and appeared sad. I informed her of the issues I was having about her telling me the

full truth. I also mentioned that I had listened to her conversation on the phone with her boyfriend when she talked about Paulson. She asked if Paulson was going to lose his job.

"I told [redacted] that if Paulson had victimized her under the color of authority or threats, he was going to lose his job. [redacted] again said, "I am not a victim." I asked [redacted] if she was lying to me to protect Paulson if she was scared. She questioned how I knew she was lying. We explained to her the record of the door pops and the duration her door was left open. I asked her if she was lying because she was threatened and asked if she needed extra protection. [redacted] said no I was no threatened I was not touched or victimized. I asked her if she was lying to protect him. She mumbled a response that was not understandable. I asked her why she was protecting him.

"[redacted] said, "I think he is a great guy, I think he is hot and he deserves his job." [redacted] said people put people in situations. People put pressure on people. [redacted] began saying this was going to "Fuck up" everything in her unit. She said she was going to be labeled a snitch because a Sgt. rolled her up. I asked her what she meant by people being pressured. She said she pressured Paulson into opening the door. I asked her if she pushed her body upon him. She stated she pushed up close to Paulson but she never touched him.

"I asked [redacted] if she would be more comfortable if an advocate were present. She asked us what we wanted. She said she did not want to get someone into trouble for something she did. She said, "I don't want him getting fired for something I wanted." [redacted] said she rubbed against Paulson and it was a little "Touchy feely". I told [redacted] to stop giving little pieces of the truth. I told her when she continues to lie it makes it seem like she was abused under the color of authority. She said, "Tell me what he said then." I told her he touched her and touched her butt. I said I knew the two did not have full sex. [redacted] said, He didn't even grab my ass, hmm ok. I just grabbed him a little bit and felt him down real quick. He told her that was inappropriate and he could get fired. She told him she did not care. She was asked if the two kissed. She said she leaned into kiss Paulson and he leaned back because he got scared. [redacted] said most of it was her coming onto him and harassing him.

"[redacted] said it was weird Paulson said he grabbed her hips. She said he never touched her hips because he was standing straight up and down like a board. I asked [redacted] if she was flushing the toilet and laughed. She said she was not flushing her toilet and had no idea what we were talking about.

"When I asked [redacted] about being out for an hour a half on 03/13/17. [redacted] said the unit was out for an hour and half. The door logs eventually matched up with the [redacted] statement. The activity log was off and not accurate. The exact times were not correct from start to finish as well as the length of the OCA time.

[redacted] statements were consistent with the door log report. Paulson did open [redacted] cell door (#49) on 03/12/17 at 1932 hours. On 03/12/17 at 2027hours, [redacted] door was re-secured. On 3/12/17 at 2119 hours [redacted] door was unsecured and at 2212 it was re-secured."

End of Interview

Correctional Deputy Garrett Paulson Interview:



On March 16, 2017, Detective Piccinini interviewed Correctional Deputy Garrett Paulson. The following is Detective Piccinini's written report from his interview with CD Paulson.

"On 03/17/17 Correctional Deputy Paulson was due back to service at 1445 hours, to start the beginning of his work week. Sgt. D. Berges, Detective F. Schmidt and I requested a Lt. Rizzo to bring correctional Deputy Paulson to a private room immediately after his pre shift briefing. We planned on interviewing him a large room located on the first floor of the jail near the back entrance. The back entrance is where most Correctional Deputies enter and exit the jail. The room in question is a large private room. There is one conference style table in the room with approximately ten chairs at the table. There is one large window in the room that faces to the east. From this window you can see people entering and exiting the jail through the back walk way to the back door entrance. The window was equipped with blinds and the blinds were used for privacy. There is only one door to the room. The door has one small window in the door that was covered by paper for privacy. I elected for Paulson to sit closest to the door and on the opposite of the table from Sgt. D. Berges Detective F. Schmidt and myself.

"Prior to Correctional Deputy Paulson entering the room the battery on my digital recorder was showing a low battery. I took a moment to change the battery prior to beginning the interview. As soon as the digital recorder was operating I pushed record and began the interview at approximately 1431 hours. I advised Paulson he was not under arrest and he was free to leave at any time. I informed him where the door was and that it was not locked. I further informed him if he had questions or concerns to ask me. I told Paulson we were there conducting an investigation regarding allegations.

"Paulson told me the following in summary:

"Correctional Deputy Paulson is assigned to swing shifts from 1445 Hours to 2245 hours. His normal days off are Wednesday and Thursdays. He has been employed with the Sonoma County Sheriff's Office for approximately one year. For the current month Paulson has been working in the "R-Module." The month before (February) he was assigned to booking.

“Paulson described R-Module as withdraw module along with "no mix" or people who cannot be housed in general population. R-Modular is a mixed unit with male and female inmates. I requested Paulson to draw a diagram of R-Module. Paulson stated R-Module is two deputy station with approximately fifty inmates. He further stated there are periods in time where a Correctional Deputy would be left alone for approximately a half hour due to covering for break periods.

“Paulson stated he was left alone in the unit for a short period of time between the hours of 1700 and 1900. Paulson described an average day in the module as arriving at approximately 1500 to 1520 hours. The correctional deputies provide the inmates with "OCA" (Out of Cell Activity) until 1700 hours.

“At approximately 1700 hours two module workers will come from J- Module. The mod workers will clean R-Module and help pass out dinner to the inmates. R-Module has a closet the module workers will use. The closet contains the cleaning supplies, clothing, pencils, forms and copies of the Holy Bible. The door to the closet is secured by a keyed door lock. Paulson stated he leaves the door locked however, open for the module worker. The module workers will then return to their cells in J-modular at approximately 1900 hours. The correctional deputies will then began their break periods where the correctional deputy who is assigned to the module will stay in the unit. The assisting correctional deputy will leave the unit to provide break for correctional deputies in other units. The assisting correctional deputy will then return to R-modular after his or her rounds.

“Paulson is required to make "rounds" in the module twice an hour. He stated if a medic comes in there might be more rounds. Paulson described making rounds as checking on each inmate in each cell to ensure their safety and wellbeing. While performing each round, correctional deputies are required to "hit the box" The box is a magnetic keyed box in each section of a module. The correctional deputy has a set of keys to the box. The box is a record of each time a correctional deputy uses his or her key to mark a completion of a round.

“Paulson stated sometimes it is required to make rounds while alone in the unit. Paulson explained that if someone was in distress during his rounds, and if alone, he would request additional resources to the unit as well as a supervisor if necessary. The correctional deputy would wait for assistance before opening the door to the distressed inmate. Paulson said, "It could be the most serious situation in the world where they`re bleeding out of their neck but if you don`t know if they`re gonna decide to come at you cause they actually want to die or whatever so you`re going to wait for other people to cover yourself."

“Paulson stated sometimes he might open a door just to talk to an inmate based on their security level. Correctional deputies have information at their desk providing information on the threat assessment of each inmate.

"Paulson stated that while he was working R- module on 3/12/14, he might have opened a couple doors while he was by himself. He was unable to recall the names of the inmates. He spoke with one male inmate by the name of, "[redacted]". [redacted] was housed in the "C box" of R module. The inmate had hit his emergency button several times. Paulson opened the door to talk with [redacted] regarding his issues of feeling Claustrophobic his cell while going through his withdraws. [redacted] never came out of his cell. Paulson opened his door to speak with him from the threshold of the open door.

"On the same date (3/12/14) Paulson opened another door for a female inmate named, "[redacted]" at approximately 1800 - 1830 hours. Paulson stated [redacted] was let out of her cell to obtain feminine products. He stated [redacted] was only let out of her cell for a few minutes. Paulson stated the feminine products are stored in an out cove between cells within the unit.

"Paulson let [redacted] out of her cell a second time at approximately 1850 hours. Paulson was unable to recall why he let her out. He stated [redacted] had asked him questions but he could not recall, what the questions were. I specifically asked Paulson if anything was "popping out in your mind" he felt would be important to tell us. Paulson replied, "I am just trying to, I am not sure what going on." I asked him what he would think if I told him someone had made an allegation about him and an inmate congregating or hanging out. Paulson stated he would be offended.

"I confronted Paulson about the recorded information I had. I asked Paulson why [redacted] cell door was popped longer than five minutes. He told me he was talking with [redacted] and trying to help turn her life around. Paulson told me he tries to get through to at least one person to stop using drugs. He feels that then would be satisfied with his career. Paulson said he has extended conversations with inmates about how their lifestyle and how they have gotten to certain points in their life. Paulson was asked if he had received any special training or classes. He stated he has not received any special training or classes to provide counseling to inmates.

"I asked Paulson if he knew of a policy or expectations of a correctional deputy in regards to contact with an inmate of the opposite sex while alone in the unit. Paulson was unsure of any policy regarding the topic. I asked if the contact would be frowned upon. Paulson stated he could see it being frowned upon but was not sure. I asked Paulson if the contact was more than just conversation if it would be frowned upon. Paulson answered, "That would be frowned upon, yeah." I asked him if that was something he would have to report. Paulson replied, "Ahh yeah if there was something going on you would probably want to report it."

"I told Paulson it was extremely important to tell the truth during our time together. I asked him what really happened last week (3/12/17) and to just be honest with me.

"Paulson Contact with [redacted]

“Paulson said the inmate we are talking about here [redacted] made some provocative type comments to him. He was asked to explain what the comments were and he questioned what we meant. It was obvious Paulson was struggling with owning the facts and telling the truth of his actions on 03/12/17. His face was becoming flushed colored and his eyes were watering up. Paulson was asked to just be truthful and put it out there so we could move on. Paulson replied, "That`s the part I am struggling with, the moving on part. You don`t know what it`s going to be." "I knew what this was going to be. Because when it happened, I mean almost immediately, I went back and I was like this can`t happen anymore this won`t happen anymore."

“Paulson was asked to explain what had happened. Paulson said [redacted] was making comments to him. He was not sure what exactly the comments were. He said that was his "first mistake" in not stopping her from making the comments towards him. He stated he should have told [redacted] to stop. He stated the comments were in regards to him being attractive. His partner left the module for break. [redacted] called Paulson over to talk to him about an unknown issue. He opened the door to [redacted] cell (#49). Paulson said the two talked. Paulson and [redacted] "had a little contact" and the two kissed. He shut the door and continued to make a round. Paulson stated he began feeling like he was "done and in trouble". Paulson however, returned to [redacted] cell door and she proactively undressed in her cell for Paulson. Paulson watched [redacted] from outside of her cell while she unclothed herself for him. After she undressed for him she dressed and he let her out of her cell again. Paulson said there was no physical contact the second time he let [redacted] out of her cell. Paulson said this incident occurred at approximately 1800 hours.

“Paulson again said there was contact the second he allowed [redacted] out of her cell. He stated, "I didn`t even really understand why I stayed there. Um I already felt like I had fucked up everything anyways. I had already known I had dug myself a hole that I probably was not going to get climbed out of and I didn`t want to dig it any deeper and make it any worse."

“Paulson went over to [redacted] cell. She was originally lying down. The two started talking through the door

“He stated he left the closet door open for the mod workers. He went into the closet to grab something in a "futile attempt to make it not make it look not weird" even though he knew it looked weird. He was leaning on the door jamb of the cell door. [redacted] was still in the cell when she kissed him.

“He was asked to clarify if [redacted] asked for the Bible. Paulson said she did not ask for the Bible. He entered the closet to grab a Bible for [redacted]. It was his way of not looking weird if someone was paying attention.

“Paulson stated that [redacted] had kissed him. He was asked if he kissed [redacted] and he replied, "Yeah." Paulson described the kiss, "was an open mouth kiss with no

tongue involved." Paulson said his right hand was on the door jamb and his other hand was either at his side or holding the door open. Paulson said the two did not converse that much after the kissing. He felt he wanted to get away from the situation and figure out "what was happening". [redacted] was talking to him how she wanted to "take it further." He believed [redacted] was insinuating she wanted to have sex with Paulson in her cell. Paulson stated he rejected her comments. Paulson thought this first incident occurred between the hours of 1800 and 1900 hours.

"Paulson worked in the module the following day and he did his best to stay away and avoid [redacted]. Paulson thought [redacted] tried to communicate with him the following day. I asked Paulson how that went Paulson stated, "You are kinda in a hard spot in corrections." It is difficult because she already had him "by the neck." He said [redacted] wanted him for "one more minute." He told her it was not going to happen and he would continue his rounds.

"Paulson wrote on a piece of paper to [redacted] that the two should not have been talking like they were and it could not continue. Paulson stated he kept the paper and discarded it at home. He stated he discarded the paper at home because he did not want it at the jail. He knew he had already crossed his moral threshold and knew it could not continue. He stated he had not reported the incident to a supervisor, co-worker, friend or family member. Paulson also did not make an attempt to be removed from the unit. He just wanted to get past the incident and made it clear to [redacted] that the behavior was not going to continue. He did not feel he had to make an effort to not work in the R- module.

"I asked him if he had asked [redacted] to undress for him. He replied, "Um I had suggested it before the first time." She asked him why he was leaving after the kiss. He told her he had to make his rounds and she asked him about next time. He asked her, "Well why don`t you just show me something." Paulson said he did not expose himself to [redacted] or masturbate himself while she was undressing for him. Paulson was at [redacted] cell door for approximately 45 seconds.

"Paulson was extremely adamant that he and [redacted] never engaged in of any touching of each other`s genital areas. The two did not engage in oral sex or intercourse. He was continually questioned regarding his involvement in receiving oral sex from [redacted]. Paulson continually denied ever receiving oral sex from [redacted].

"I again asked Paulson to walk me back though the incident on the evening 03/12/17 in attempt to clarify and obtain the true facts in a chronological order. Paulson again told me the following summary:

"Paulson completed a round in the module and walked over to [redacted] cell (#49). Once he was at her cell door she told Paulson to open her door. He told her he was not going to open the door. Prior to Paulson opening the door he went to the mod worker`s closet near [redacted] cell door. He unlocked the door and opened it concealing his location. He then opened [redacted] cell door. The two began to talk.

[redacted] was saying how she wanted to be with Paulson. Paulson had his right hand on the upper part of the door jamb. The two engaged in an open mouth kiss. His right hand stayed on the door jamb. [redacted] began placing her hands on Paulson`s chest. Paulson remembered having his flashlight in his left hand. He put his flashlight away. Paulson stated he probably began touching [redacted] body from her "breast" to her "butt."

“Paulson stopped kissing [redacted]. He "knew it had been too long." Paulson said he had to try to "avoid exposing myself to that." He then went into the closet to get [redacted] the bible. He provided [redacted] with the Bible and shut her cell door, however he left the closet door open with the intention of returning to [redacted] cell door. He was under the impression "she was going to take her clothes off", and he was going to see "her exposed." She had "essentially" asked him to have sex with her in her cell. Paulson suggested to [redacted] she expose her body to him. Paulson stated [redacted] said "Ok" and agreed to expose herself to him. Paulson estimated [redacted] undressed for approximately one minute. After she was nude and had exposed herself to him she dressed herself. Paulson let [redacted] out of her cell so [redacted] could retrieve feminine products. [redacted] was not in need of a feminine product. Paulson stated, "I think that was both our ways of making less weird." [redacted] returned to her cell however the two continued to talk. Paulson was trying to back out of the incident. [redacted] was wanting intercourse from Paulson. She continued to ask Paulson to come into her cell.

“While Paulson was talking with [redacted] she never asked about exchanging phone numbers or establishing a relationship together once she was released from jail. Paulson did tell [redacted], if nothing came from this incident and she could stay "sober for a while" they could try some type of a relationship.

“Paulson was asked if he ever looked up her information. Paulson said he had looked up [redacted] on "Facebook once or twice." He was asked if he had accessed the jail systems to obtain information about her. Paulson said he did look at [redacted] information using "Crim.net." He said he did it before the incident and after the incident because he was interested in her. He said after the incident he blocked [redacted] from his Facebook and Instagram. Paulson said he never specifically looked for her phone number or address. He was looking at her prior case and write ups. He was questioned if he ever tabbed through the phone number or addresses for [redacted]. Paulson said he never looked at the address tab or phone number tab to retain the information. He stated he knew system had a "Click tracker." He said it could show he looked at the phone number and address of [redacted]. He also said he works with other deputies who may have used the computer when he was logged on to the computer system and away from the computer station.

“Paulson said he could remember the incident better if he was able to write the incident. I provided him with a piece paper and pen. Paulson provided a written statement. I later requested Paulson to initial the beginning and end of his

statement and he did. I requested he sign the statement as well and he did. I later booked the written statement[4] for evidence.

"The interview was recorded using a digital recorder. I later transferred the recording to a compact disc and I booked the disc for evidence."

End of Interview

On March 21, 2017, Detective Piccinini received the following memorandum[5] from Correctional Deputy Weger regarding this case.

"On 03/21/17, I was assigned to work in "A" module at the MADF. As the morning progressed Starting Point came into the unit and classes began. There are several new inmates in the unit who were unable to participate in today's class but had to fill out paperwork and once completed, they were instructed to head back to their assigned cells until programs could get them into the computer to account for their programming time.

"While on a round inmate [redacted] flagged me down to ask me a question. I recognized [redacted] from prior in custody experiences and keyed open her cell door to speak with her. [redacted] asked me, "Does C.O. Garrett Paulson still worked here?" [redacted] then insinuated that I knew what was "going on." I told her that I had only heard scuttle butt and had no official knowledge of any incident. I told [redacted] that from what I had heard, it did not look good for Deputy Paulson. [redacted] then told me, "I wish he hadn't said anything, I totally denied everything." I asked [redacted] to explain it from her standpoint.

"[redacted] stated, "[redacted] told on Paulson and said that she ([redacted]) had heard [redacted] stated that she had performed a blow job" (on Paulson.) [redacted] stated that "her cell door was open for over an hour and that the cleaning closet in "R-module was open so that it blocked vision to her cell." [redacted] also told me that [redacted] was her neighbor and was the one who ratted.

"Over the course of the conversation I told [redacted] that I had heard there was a crime report written but U had not seen it. [redacted] seemed genuinely concerned for Paulson and in no way acted like a victim. My perspective was that she genuinely cared for Paulson. She knew details about his personal life such as he was raising a baby. I told [redacted] that it sounded to me like Paulson had stepped over the line, no matter what. I then stated that I had heard there was some petting and kissing between Paulson and [redacted]. [redacted] confirmed that this had happened. I inquired what [redacted] had to do with the incident since I know they had both been moved to "A" module on the same night. [redacted] told me that "Paulson had shined his flashlight into [redacted] cell on numerous occasions for longer than the usual

[4] A copy of this statement can be located in Exhibits.
[5] A copy of this memorandum can be located in Exhibits.

time." She did not elaborate. I ended my conversation with [redacted] and continued on my round.

"As I approached [redacted] door, she also flagged me down. [redacted] stated "I saw you talking to [redacted] and I just had to know? Is Paulson OK? She then stated, "I want it to be known that I did not say anything." I told [redacted] that I had heard it wasn't good for Paulson. [redacted] did not elaborate, but just appeared to want to protect herself. [redacted] did state that "It was going to be weird, being housed in a unit where Paulson's sister worked." It was clear to me that [redacted] believed H. Paulson to be G. Paulson's sister. I told her she had bad information and the two were not related.

"I continued on my rounds and returned to my desk. As it would happen Sergeant Grenier came into the unit on an unscheduled round. I told him that both girls had spoken to me regarding the incident. I also confirmed that I had only heard jail "rumors" about Paulson. I had not seen the report, nor was I at work over the weekend. I honestly did not want to get wrapped up in and IA investigation but know it is my duty to report findings, especially when a co-worker's job is on the line."

End of Memorandum

On March 22, 2017, Detective Piccinini conducted a follow up two follow up interviews with Inmate [redacted]. One interview was conducted at approximately 1810 hours. The second interview was conducted with a Verity advocate present with Inmate [redacted]. The following is Detective Piccinini's written report from his interviews with Inmate [redacted].

[redacted] First Re-Interview

"I contacted [redacted] in contact visiting at approximately 1810 hours. I was accompanied by Det. M. Regan. The interview was recorded using a digital recorder. The recording was later transferred to a compact disc. The disc was later booked for evidence. The following is a summary of the interview:

"[redacted] told me that on 03/22/17 she was almost removed from A-Module. She stated she was speaking in "group." She said she did not say "anything about the incident. I was just feeling some type of way." She said something to a "counselor" about why she was there in A-Module. [redacted] said she did not say the exact reason why she was there, she only "said something." The Sgt. later called and said to have [redacted] "Rolled up and moved to F-Module." [redacted] stated she received a write-up for talking about P.T.S.D.

"[redacted] said she was upset and told the counselor (Denise) why she felt upset about the incident. The counselor then called "Tasc" (Bonnie Lyon). [redacted] said now "Tasc" my not allow her into the program. Correctional Deputy Chavez said [redacted] was talking about the situation, speaking of the "Paulson incident." Moments later [redacted] was being removed from A-Module, but then she received information

from Sgt. Gallaway that he had changed his mind. [redacted] told me she had attempted to contact me on this date (03/22/17) however she received a voicemail stating I was unavailable. She then asked if I had called her a few days prior. I later learned through this interview she was referring to when I requested to speak to her again on 03/19/17. [redacted] refused to speak with me on 03/19/17 regarding this incident.

"I informed [redacted] I was there to talk to her regarding the memo written by Correctional Deputy Weger. [redacted] was upset that the Correctional Deputy "told on her." I informed her she had to due to the level of seriousness of this incident. She then asked if Correctional Deputy Paulson was fired. I informed her I did not know if he was fired as of this time. Per the Sonoma County Sheriff`s Office Prison Rape Elimination Act Policy (P.R.E.A.), I informed [redacted] that Paulson was no longer working in the facility, that Paulson was on administrative leave and that I was requesting the District Attorney`s Office to review my investigation for possible criminal charges. She asked if Paulson was "looking at jail." I told her that it was possible. I explained the importance of the investigation and she asked, "and I can sue. I get to take it to that level." I told her she could.

"I told her I wanted to know what she had lied to me about the first time I had interviewed her. She told me that I had said Paulson admitted what had happened and asked why Paulson was not in jail. I explained to her that Paulson was innocent until proven guilty. She asked me if I was talking with inmate, [redacted]. She asked if I was listening to inmate [redacted] said, "That bitch is mental health. Please don`t listen to anything she says." [redacted] made this comment while she was laughing. I believe this was done in an attempt to cover up or possibly protect Paulson. [redacted] asked, if she was willing to admit things regarding the incident, if she would be placing Paulson under arrest. I educated [redacted] about the process and stated that she was not placing charges on Paulson, however based on my investigation I was filing the case with the District Attorney`s Office.

"I asked [redacted] what she had lied to me about on the evening of 03/17/17. [redacted] admitted she did kiss Paulson. She said, "We touched. That pretty much it." I spoke with her regarding her undressing for him. She admitted to undressing for Paulson while the closet door was open. [redacted] told me Paulson had left a note in her sink during a cell search. She could not remember exactly what the note read. She thought it read, "careful how you are with the `C.O.'s` they will get you." [redacted] took this as a warning from Paulson about her making comments about him in front of other C.O.'s.

"[redacted] said the two continued to communicate through writing notes and showing them through the glass on her door. She was unable to recall what the notes said. I asked [redacted] what day she had received the notes. She was unable to recall exactly what date it was due to her withdrawing from drugs. She did remember one of the notes from Paulson stated he was going to add her on Facebook. [redacted]

said that she could not see the letter that well because it was dark. She thought it said that he would add her on Facebook when she got out if she stayed sober.

"[redacted] asked if she could know what Correctional Deputy Weger wrote about her. I informed her Correctional Deputy Weger wrote, "[redacted] then told me I wish I had not have said anything. I wish I denied everything." [redacted] replied, "I did ha." [redacted] asked if the conversation was going to change her housing while in the Sonoma County Jail. I told her it was not. She said she was scared to tell. I asked her what she was scared about and she said she did not want Paulson to lose his job. She was scared for Paulson and his family. I asked if she was scared for herself. She said she felt awkward in her stomach like a, "Gross feeling." She asked me if it was weird and I told her I did not understand. She said it was like a, "dirty feeling." I again asked her about her scared feeling and she said, "Like wrong." I asked her on whose part and she said, "Both my palms are hella sweaty just thinking about it." I asked her if she wanted an advocate and she asked what an advocate was and the process of getting an advocate. She said she would like to get an advocate. Det. M. Regan contacted Verity Advocate services and requested an advocate for [redacted]. She stated she would like an advocate. She also asked me, "Where do we go with this whole thing?" I told her I was unsure and said we should wait until an advocate arrived.

"I asked her what she meant when she told Deputy Weger that Paulson was spending longer than usual time at the inmate [redacted] cell window. She told me the time Paulson spent outside of [redacted] window was, "Like two seconds longer." [redacted] asked me if I was going to listen to more of her jail phone calls. I told her I was going to listen. She told me she was threatening the camera in the court holding cell while she was waiting for us to arrive to interview her. She said she was threatening she was going to sue the county if she was going to be moved to F-Module. She then said, "I still wanna sue the county in general." I asked her what she was going to sue for and she replied, "Everything. I don`t know. My dad said I should." She asked what I thought, if she had the right, how she went about it and how to get the right connection. I told her I was not going to tell her one way or another I could not advise her. I told her I had never sued anyone and did not know how she could pursue it.

"The interview was stopped while we waited for the arrival of the advocate based on [redacted] request."

[redacted] Re Interview #2

"[redacted] said she was making passes at Paulson. She was telling him he was "gorgeous" and she was attracted to him. She believed on 03/12/17 Paulson popped her door and placed the note in her sink at approximately 1600 hours. I looked through the door pop logs and did not see a door pop for a short period of time on or near 1600 hours.

"I told [redacted] I felt that she had been honest with me however she was not telling me 100 percent of the truth. I asked her if she was trying protect Paulson, [redacted] immediately replied, "yes." She protected him because she did not want him to lose his job.

"I asked [redacted] if she had requested Paulson to open her door on 03/12/17. She said, "Yes." I told her she originally told me she approached Paulson and began rubbing his chest with her hands. She demonstrated to me how Paulson was standing in the threshold of her cell when she began touching him. She leaned into Paulson and he leaned away from her. [redacted] stated Paulson made a statement of, "I am not getting anything out of this." She replied, "Whatever." She began to kiss Paulson and he was kissing her back. [redacted] described the kiss as an open mouth kiss and both their tongues were involved in the kiss. [redacted] seemed disappointed that Paulson said his tongue was not used in the open mouth kiss.

"I asked her if she felt Paulson was displaying emotions and feelings for her other than as an object. [redacted] said she was not sure how Paulson felt about her and that she believed he just found her attractive. [redacted] told me she saw Paulson`s "background" and it was Johnny Cash. She also told me he does not like fishing.

"[redacted] asked me if I had talked with cell 50. I told her I had not and she seemed disappointed. I informed her I did not talk to Ashley in cell 50 because Ashley was having an extremely difficult time withdrawing on the night of the incident and the night of this investigation (03/17/17). [redacted] became upset saying we talked to [redacted]. She accused [redacted] of being crazy. [redacted] then asked me if Paulson thought [redacted] had reported him. She had a sad voice when she asked this. When I told her no it appeared to lighten her mood. I believe [redacted] was continuing to attempt to protect Paulson from the incident on the 12th even though [redacted] continued to corroborate Paulson`s statement with her information.

"I asked [redacted] if she was fearful of Paulson if he learned she had talked to us. She said, "No." I asked [redacted] if she was concerned about her safety or if she was worried about Paulson trying to find her and hurt her in anyway and she said, "No." I asked her why she asked the question. She stated she was curious because she knew the report came from [redacted] about her providing oral sex to Paulson. She did not want this whole thing to become a big situation like it did.

"I later informed [redacted] I believed the two both had feelings for each other. [redacted] told me she could read Paulson and she was very attracted to him. She thought that he was attracted to her too. She stated Paulson risked everything. She stated she knew Paulson "had a baby and a girl and now he is, you know, and it breaks my heart." I told her, from what she had told me, she had an emotional and mental attachment to him and I thought it was possible he felt the same way towards her. She asked me, "How long will he do?" I told her I was unaware of any sentencing.

“[redacted] said she felt responsible for what had happened. I asked her why and she replied, "Because I asked him to." I asked if he agreed and she said, “After a few times of me telling him to." I asked if he told her the entire time if he knew what was going to happen to him if he was caught, and she replied in soft voice, “Yeah he said he was going to get fired.” I asked her if she was asking him to come into her cell so more activities could take place or insinuating they should have sex. She first said no. I asked her if she was in fear of getting in trouble. I told her she was still not going to be in trouble. She then told me she forgot, and that she was actually asking Paulson to come into her cell and have sex with her. Paulson refused to enter the cell any further or have sex with her.

“[redacted] began saying she still believed Paulson never touched her. She said Paulson was acting like a, "stick" and stated he was, "scared." She described both his hands straight down at his sides. She thought Paulson was holding a flashlight in his hand. Then she said, “No he was not holding a flash light because he retrieved a Bible for me from the closet." [redacted] said she asked Paulson if she could get a tampon because she got nervous. I asked her why she was nervous and she replied because her cell door was open. [redacted] said she instructed Paulson to open the closet door because she knew where the cameras were and she knew it would conceal their activity. I asked her if she was again protecting Paulson from his actions and she replied, “No.” She stated she learned from another "C.O." or inmate that the door would conceal the activity to her cell.

“[redacted] refused to talk to me about where or who she received the information from regarding the open closet door.

“I asked her whose idea it was for her to undress. She told me it was Paulson`s idea for her to "give him a show." [redacted] said she agreed to give Paulson a show when he came around for another round. She said Paulson left the closet door open as he left for the round to return for the show.

“I asked [redacted] if she had any concerns about still being housed in the Sonoma County Jail. She told me did not have concerns and asked if she should. I began ask her how long she was going to be in the jail. She asked me if things went bad in the jail or if, "say this gets out can we make a deal?" I told her I do not make deals. She then told me she was going to be in the Sonoma County Jail for a few months. [redacted] was not against the idea of being relocated. [redacted] said her father wants her to sue the county. She said that if Paulson is going to go to jail then she would sue. Again [redacted] demonstrated ways to protect Paulson. Prior to leaving the interview she stated she was not that type of person, indicating she would not sue.”

End of Interview

On March 3, 2016, CD Paulson completed the Sonoma County Sheriff's Office Prison Rape Elimination Act of 2003 training and signed the Training Documentation Form[6].

Sonoma County Sheriff's Office

STEVE FREITAS
Sheriff-Coroner

ROBERT GIORDANO
Assistant Sheriff
Law Enforcement Division

RANDALL WALKER
Assistant Sheriff
Detention Division

Sonoma County Sheriff's Office
PREA Training

Training Documentation Form
2016

The Sonoma County Sheriff's Office, in compliance with the Prison Rape Elimination Act of 2003, mandates zero tolerance toward all forms of sexual abuse, sexual harassment and sexual assault of any inmate in custody. All incidents of sexual abuse that occur in the Sonoma County Detention Facilities shall be thoroughly investigated, documented and reported in accordance with the mandates set forth in the 2003 Prison Rape Elimination Act (PREA) and the Department of Justice National PREA Standards.

MEMBER'S NAME	JOB CLASS
Garrett Paulson	Corrections Deputy I

I have been trained on the PREA training powerpoint presentation. I understand and have discussed any questions/concerns with the presenter(s).

Signature — Date: 3/3/16

[6] A copy of this form can be located in Exhibits.

On 05/22/17, the Sonoma County District Attorney's Office chose not to pursue criminal charges against CD Paulson citing "lack of victim cooperation."

End of Investigation

Conclusions and Findings

The purpose of this Internal Affairs investigation was to investigate the circumstances surrounding Correctional Deputy Garrett Paulson's conduct/action in regards to his actions and relationship with Inmate [redacted].

Employment History:



CD Paulson was hired on March 1, 2016. CC Paulson does not have any Commendation and/or Appreciation. CD Paulson's has not received a performance evaluation as he has only been employed by the Sheriff's Office since March 2016 and has yet to receive his first evaluation. CD Paulson does not have any discipline.

Incident:

On March 15, 2017, Correctional Sergeants Grenier and Pitkin interviewed Inmate [redacted] who wanted to report alleged inappropriate behavior between an inmate and a correctional deputy. During the interview, [redacted] advised Sergeants Grenier and Pitkin that on or about March 13, 2017, she observed a correctional deputy (later identified as Correctional Deputy (CD) Garrett Paulson) block the view of cell door R-49, which was occupied by Inmate [redacted], with a storage room door. When the view of the door was blocked, CD Paulson would spend approximately 15 minutes near the door obstructed from the view of others. Inmate [redacted] reported hearing moaning during this time. Inmate [redacted] said this would occur after CD Paulson's partner would leave the module.

Additionally, Inmate [redacted] said CD Paulson appeared to give preferential treatment to Inmate [redacted] and provide her access to things she had never seen a correctional officer provide to an inmate. CD Paulson also shared personal information with Inmate [redacted] which Inmate [redacted] though was unusual.

Inmate [redacted] asked Inmate [redacted] about CD Paulson and Inmate [redacted] said CD Paulson was "fine" and made facial gestures suggesting something of a sexual nature occurred between her and CD Paulson. This information was reported to the Detention Division Administration via the chain of command by Sergeant Pitkin.

On March 16, 2017, Domestic Violence/ Sexual Assault Detective Piccinini was assigned to investigate this case.

On March 17, 2017, I was assigned this case by Lieutenant James Naugle to determine if Correctional Deputy Paulson violated Sheriff's Office Rules and Regulations.

During a criminal investigation conducted by the Sonoma County Sheriff's Office Domestic Violence/ Sexual Assault Unit, CD Paulson admitted to kissing and touching the breasts and buttocks of an incarcerated inmate and asking her to disrobe for him. In addition CD Paulson did not report his behavior to his supervisor as required by Sheriff's Office policy.

During Detective Piccinini's interview with Inmate [redacted], she admitted to kissing CD Paulson and undressing for him, as well as secretly communicating with him via handwritten notes.

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT AND RESPONSIBILITY

2. Local, State and Federal Laws: Members shall observe, obey and uphold all local, state and federal laws.

Specifically

289.6 (a) (1) PC: An employee or officer of a public entity health facility, or an employee, officer, or agent of a private person or entity that provides a health facility or staff for a health facility under contract with a public entity, who engages in sexual activity with a consenting adult who is confined in a health facility is guilty of a public offense. As used in this paragraph, "health facility" means a health facility as defined in subdivisions (b), (e), (g), (h), and (j) of, and subparagraph (C) of paragraph (2) of subdivision (i) of, Section 1250 of the Health and Safety Code, in which the victim has been confined involuntarily.

(b) As used in this section, the term "public entity" means the state, federal government, a city, a county, a city and county, a joint county jail district, or any entity created as a result of a joint powers agreement between two or more public entities.

(d) As used in this section, "sexual activity" means:

(1) Sexual intercourse.

(2) Sodomy, as defined in subdivision (a) of Section 286.

(3) Oral copulation, as defined in subdivision (a) of Section 288a.

(4) Sexual penetration, as defined in subdivision (k) of Section 289.

(5) The rubbing or touching of the breasts or sexual organs of another, or of oneself in the presence of and with knowledge of another, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of oneself or another.

During his interview with Detective Piccinini, CD Paulson admitted to touching Inmate [redacted] breasts and buttocks. Inmate [redacted] was not forthcoming regarding her contact with CD Paulson and I believe she minimized the extent of her contact with CD Paulson in order to protect him. This belief is furthered by Inmate [redacted] comment to CD Weger, "I wish he hadn't said anything, I totally denied everything."

Though the Sonoma County District Attorney's Office did not charge CD Paulson in this case citing "lack of victim cooperation", the California District Attorney's Association standards for charging a case are "the guilt of a suspect must be proven beyond a reasonable doubt." However, based on CD Paulson's interview with Detective Piccinini as well as his interviews with Inmate [redacted], and the door activity records, I believe probable cause exist for the charge of 289.6 (a)(1) PC.

Additionally the Prison Rape Elimination Act of 2003 (PREA) prohibits Voyeurism. Voyeurism is defined as "An invasion of privacy of an inmate or detainee by staff for reasons unrelated to official duties, such as peering at an inmate who is using a toilet in his or her cell to perform bodily functions; requiring an inmate to expose his or her buttocks, genitals, or breasts; or taking images of all or part of an inmate's body or of an inmate performing bodily functions." CD Paulson and Inmate [redacted] stated she removed her clothing exposing herself to him at his request. PREA and Office policy state alleged consent is not a defense. Therefore, I believe this allegation should be sustained.

Findings: Sustained

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT AND RESPONSIBILITY

4. Standard of Conduct: Members shall conduct their private and professional lives in such a manner so as to avoid brining discredit upon the Office.

During his interview with Detective Piccinini, CD Paulson admitted to touching Inmate [redacted] breasts and buttocks. Inmate [redacted] was not forthcoming regarding her contact with CD Paulson and I believe she minimized the extent of her contact with CD Paulson in order to protect him. This belief is furthered by Inmate [redacted]s comment to CD Weger, "I wish he hadn`t said anything, I totally denied everything."

CD Paulson's actions are a violation of the Prison Rape Elimination Act of 2003. Additionally, the Sonoma County Sheriff's Office Policy Statement states in part "The Sonoma County Sheriff's Office, in compliance with the Prison Rape Elimination Act of 2003, mandates zero tolerance toward all forms of sexual abuse, sexual harassment and sexual assault of any inmate in custody."

CD Paulson's interaction with Inmate [redacted] necessitated a criminal investigation which was forwarded to the Sonoma County District Attorney's Office bringing discredit to the Sonoma County Sheriff's Office. Therefore, I believe this allegation should be sustained.

Findings: Sustained

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT AND RESPONSIBILITY

14. Prohibited Activities On-duty: Members are prohibited from engaging in the following non-exclusive activities while on-duty:

n. Engaging in on-duty sexual relations including, but not limited to sexual intercourse, excessive displays of public affection or other sexual contact.

During his interview with Detective Piccinini, CD Paulson admitted to touching Inmate [redacted] breasts and buttocks. Inmate [redacted] was not forthcoming regarding her contact with CD Paulson and I believe she minimized the extent of her contact with CD Paulson in order to protect him. This is belief is furthered by Inmate [redacted] comment to CD Weger, "I wish he hadn`t said anything, I totally denied everything." CD Paulson's actions are a violation of this policy. Therefore, I believe this allegation should be sustained.

Findings: Sustained

RULES AND REGULATIONS REGARDING CONDUCT

5.0 PROCEDURES

B. DUTIES, CONDUCT AND RESPONSIBILITY

37. Members shall report their own actions or transactions, and those of other members, to their manager via chain of command where such actions/transactions may result in criminal prosecution or discipline under this policy.

Under this Rule and Regulation, CD Paulson was required to report his actions with Inmate [redacted] It was clear by his statement to Detective Piccinini CD Paulson knew his actions violated policy. CD Paulson stated "…I had already known I had dug myself a hole that I probably was not going to get climbed out of and I didn`t want to dig it any deeper and make it any worse."

Though CD Paulson knew his actions with Inmate [redacted] violated Sheriff's Office Policy, he did not report his actions to his supervisor as required. Therefore, I believe this allegation should be sustained.

Findings: Sustained