

STATE OF CALIFORNIA - COUNTY OF LOS ANGELES
SEARCH WARRANT AND AFFIDAVIT
(AFFIDAVIT)

Your affiant, [redacted] swears under oath that the facts expressed by him/her in this Search Warrant and Affidavit and the attached and incorporated Statement of Probable Cause are true and that based thereon he/she has probable cause to believe and does believe that the property and/or person described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the [redacted] requests that the Search Warrant be issued.

HOBBS SEALING REQUESTED: YES [ ] NO [X]
NIGHT SEARCH REQUESTED: YES [ ] NO [X]

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICE OFFICER, OR PEACE OFFICER IN THE COUNTY OF LOS ANGELES: proof by affidavit having been made before me by [redacted] that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 as indicated below by "x" (s) in that it:

- was stolen or embezzled.
was used as the means of committing a felony.
is possessed by a person with the intent to use it as means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery.
tends to show that a felony has been committed or that a particular person has committed a felony.
tends to show that sexual exploitation of a child, in violation of P.C. Section 311.3, has occurred or is occurring.
there is a warrant for the person's arrest;

YOU ARE THEREFORE COMMANDED TO SEARCH: SEE ATTACHMENTS

FOR THE FOLLOWING PROPERTY or PERSON(S): SEE ATTACHMENTS

AND TO SEIZE IT/THEM IF FOUND and bring it forthwith before me, or this court, at the courthouse of this court. This Search Warrant and incorporated Affidavit was sworn to and subscribed before me this 8 day of September 2022 at 12:30 P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

HOBBS SEALING APPROVED: YES [ ] NO [X]
NIGHT SEARCH APPROVED: YES [ ] NO [X]

(Signature of Magistrate)
CRAIG RICHMAN
Judge of the Superior Court of California, County of Los Angeles



As required by Penal Code 1546.1 (d), this warrant describes with particularity, the time period covered (unless the court determines that it is not appropriate to specify a time period because of the circumstances of the investigation), the target accounts, the applications or services covered, and the types of information sought, and further requires that any information unrelated to the objective of the warrant be sealed and not subject to further review without a court order.

As required by Penal Code 1524.3 (c); those item(s) that are within the scope of this warrant will be copied and retained by investigative agents. Investigating agents will then seal any information from the device that is unrelated to the objective of the warrant and will not further review the information absent and order from the Court. If no evidence of criminal activity is discovered relating to the seized property and associated peripherals, the devices(s) will be returned promptly.

Note: Penal Code 1546.2 mandates the the law enforcement agence serving the warrant that includes the production of or access to electronic communication/device information notifies the target of the warrant contemporaneously with the service of the warrant. This mandatory disclosure may be delayed for up to 90 days upon a showing that notification may have an adverse result to the investigation. An "adverse result" means any of the following: (1) danger to the life of physical safety of an individual; (2) flight from prosecution; (3) destruction or tampering with evidence; (4) Intimidation of potential witnesses; or (5) serious jeopardy to an investigation or undue delay of a trial



STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
**SEARCH WARRANT AND AFFIDAVIT**

**YOU ARE THEREFORE COMMANDED TO SEARCH THE FOLLOWING LOCATION:**

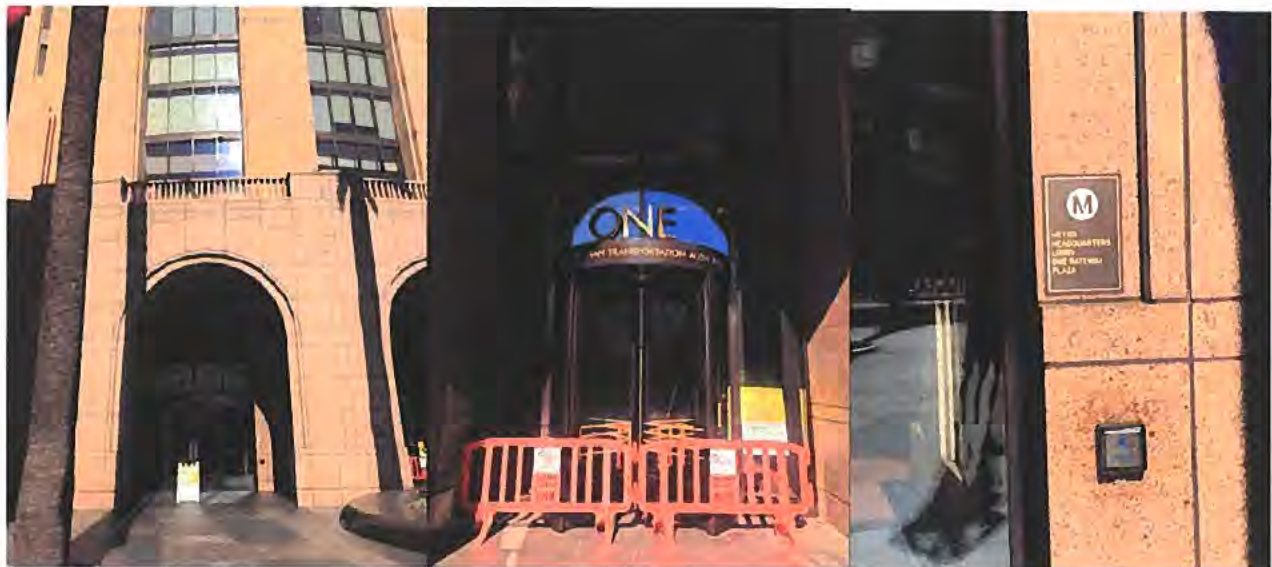
**Los Angeles County Metropolitan Transportation Authority located at:**

**One Gateway Plaza, Los Angeles, CA 90012-2952  
Main Number: 213/922-6000;**

The Metropolitan Transit Authority Headquarters Building (DBA One Gateway Plaza) is a 398 ft. high rise office tower in Los Angeles, California. It is located in Northeastern downtown Los Angeles, east of the railroad tracks from Union Station.

It serves as the main headquarters for the Los Angeles County Metropolitan Transportation Authority.

The building is constructed of a tan colored English stone/brick exterior with a brown trim surrounding its multiple windows. The front door faces to the South. A plaque affixed to the brown granite adjacent to the front glass doors reads "Metro Headquarters Lobby, One Gateway Plaza."



STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
**SEARCH WARRANT AND AFFIDAVIT**

1 **YOU ARE THEREFORE COMMANDED TO SEARCH THE FOLLOWING LOCATION:**

2 **“Peace Over Violence” a non-profit organization located at:**

3 **1541 Wilshire Boulevard, Suite 300. Los Angeles, CA 90017**  
4 **Main Number: 213/955-9090;**

5 Further described as a office space that occupies the entire 3<sup>rd</sup> floor of the “Wilshire Union Plaza” office  
6 building. This building is in the Westlake District of Los Angeles, California.

7 The front of the building faces south and is constructed of a grey stucco and numerous glass windows.  
8 The north, east, and west side of the building are comprised of red brick, and numerous glass windows.  
9 Large numbers “1541” are affixed to the front southeast corner of the building, facing south. The main  
entrance faces East. The numbers “1541” are painted on the glass frame over the East facing double  
glass doors.

10 Although there were no visible business signs displaying “Peace Over Violence” at the location, a  
11 uniformed building security officer confirmed verbally that “Peace Over Violence” is located on the 3<sup>rd</sup>  
12 floor of the building. He further stated the building is currently under renovations, and business signs will  
be added later.

13 The Operations Administration Manager for Peace Over Violence, confirmed 1541 Wilshire Boulevard,  
14 Suite 300. Los Angeles, CA 90017 was the current address of the “Peace Over Violence” Headquarters.





STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
**SEARCH WARRANT AND AFFIDAVIT**

**YOU ARE THEREFORE COMMANDED TO SEARCH THE FOLLOWING LOCATION:**

**Office of the Inspector General (OIG) of the Los Angeles County Metropolitan Transit Authority, located at:**

**818 West 7th Street, 5th floor, Los Angeles, 90017**

The Office of the Inspector General of the Los Angeles County Metropolitan Transit Authority is headquartered on the 5<sup>th</sup> floor of the 12-story Barker Brothers Furniture Company Building.

The building is constructed of a brown stone brick exterior with light terra cotta stonework trim. A brown trim surrounds its multiple windows and glass doors. There is a 3-story tall round arched center front entrance which faces to the North. Large brown numbers that read "818" are affixed, centered above the front glass doors, in the polished wood trim.



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**SEARCH WARRANT AND AFFIDAVIT**

1 **YOU ARE THEREFORE COMMANDED TO SEARCH THE FOLLOWING**  
2 **LOCATION:**

3 **Office of Sheila Kuehl located at:**

4 **821 Kenneth Hahn Hall of Administration**  
5 **500 W. Temple Street. Los Angeles, Ca. 90012**  
6 **Main Number 213/974-3333**

7 The office of Sheila Kuehl is located on the North/East corner of the 8<sup>th</sup> floor of the Kenneth Hahn  
8 Hall of Administration building.

9 The Hall of Administration is a 10-story complex located in downtown Los Angeles. The  
10 building is clad in panels of ceramic veneer with the lower floors featuring polished red granite.  
11 Large gold-colored letters that read "Kenneth Hahn Hall of Administration" are affixed, centered  
12 above the front glass doors. Large gold-colored numbers and letters that read "500 W Temple" are  
13 affixed to the red granite trim facing the Temple Street.

14 The words "Sheila Kuehl Supervisor 3<sup>rd</sup> District" are displayed in gold letters on the glass adjacent  
15 to the front door of office 821.



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**SEARCH WARRANT AND AFFIDAVIT**

1 **YOU ARE THEREFORE COMMANDED TO SEARCH THE FOLLOWING**  
2 **LOCATION:**

3 **Residence of Sheila Kuehl located at:**

4 [REDACTED]

5 Further described as a [REDACTED] two-story family residence, on a [REDACTED] lot,  
6 constructed of [REDACTED]. Affixed on the exterior south facing wall, adjacent to  
7 the front wooden door are the numbers [REDACTED]. There is a secondary sign affixed to a  
8 brown wooden fence along east facing side of the property, which reads [REDACTED] in white  
9 letters. The location has a brownish-red composite roof, with an unattached garage. This  
10 residence is located [REDACTED], Los Angeles County.

11 At the above described location, your Affiant requests permission to search all rooms, attics, safes,  
12 basements and other parts therein, the surrounding grounds, any garages, storage rooms,  
13 containers, and out-buildings of any kind located therein and any common trash containers and  
14 storage areas designed for the use of the specifically described residence, and any vehicles directly  
15 on the property or in the street in front of, nearby or adjacent to the above identified location,  
16 provided that prior to searching said vehicle or vehicles it is confirmed that said vehicle(s) are  
17 registered, legally possessed by an individual residing at the residence or can be specifically  
18 connected to the Suspect.

19 [REDACTED]



STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
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1  
2 **YOU ARE THEREFORE COMMANDED TO SEARCH THE FOLLOWING**  
3 **LOCATION:**

4 **Residence of Patricia Giggans located at:**

5 [REDACTED]

6 Further described as a [REDACTED] two-story family residence, constructed of [REDACTED]  
7 [REDACTED]. Affixed above the west facing light brown wooden door, are the  
8 numbers [REDACTED]. A [REDACTED] the front yard.  
9 The house has a grey composite roof. This residence is located within [REDACTED], Los  
10 Angeles County.

11 At the above described location, your Affiant requests permission to search all rooms, attics, safes,  
12 basements and other parts therein, the surrounding grounds, any garages, storage rooms,  
13 containers, and out-buildings of any kind located therein and any common trash containers and  
14 storage areas designed for the use of the specifically described residence, and any vehicles directly  
15 on the property or in the street in front of, nearby or adjacent to the above identified location,  
16 provided that prior to searching said vehicle or vehicles it is confirmed that said vehicle(s) are  
17 registered, legally possessed by an individual residing at the residence or can be specifically  
18 connected to the Suspect.

19 [REDACTED]

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**FOR THE FOLLOWING PROPERTY:**

1. Any article of personal property tending to establish the identity of persons who have dominion and control over the premises and vehicles to be searched, including all keys to the described location and vehicles, rent receipts, utility bills, telephone bills, addressed mail, purchase receipts, sales receipts, and articles of personal property tending to show ownership of locations and vehicles including, but not limited to vehicle title and vehicle registration. All personal property and documents used as means of identification, including by not limited to driver's licenses, credit cards, passports, social security cards, alien cards, California identifications and photographs relative to the person(s) found at the locations.
2. Any computer hardware which consists of all equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar computer impulses or data. Hardware includes (but is not limited to), any mother-boards, any data-processing devices (such as chips, memory typewriters, and self-contained "laptop" or "notebook" computers); internal and peripheral storage devices (such as fixed disks, external hard disks, floppy disk drives and diskettes, tape drives and tapes, optical storage devices, CDs, DVDs, thumb drives, media cards, and other memory storage devices); peripheral input/output devices (such as keyboards, printers, scanners, plotters, video display monitors, and optical readers; and related communications devices (such as modems, cables and connections, recording equipment, RAM or ROM units, automatic dialers, speed dialers, programmable mechanisms, or parts that can be used to restrict access to computer hardware (such as physical keys and locks).
3. Any computer software which consists of any digital information which can be executed by a computer and any of its related components to direct the way they work, including programs to run operating systems, applications (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communication programs. Software can be stored in electronic, magnetic, optical, or other digital form.
4. Any computer-related documentation described as written, recorded, printed, or electronically stored material, which explains or illustrates how to configure or use computer hardware, software, or other related items.
5. Any computer passwords and other data security devices designed to restrict access to or hide computer software, documentation, or data, consisting of hardware, software, or other programming code. Data security hardware may include encryption devices, chips, and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.
6. Any cellular phones, answering machines, storage devices for answering machines, facsimile machines, used to facilitate the commission of a crime.



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**The forensic examination of any data found on the above mentioned computer/digital related media for the following information:**

**LOS ANGELES COUNTY METROPOLITAN TRANSIT AUTHORITY**

1. Any contracts or agreements, between "Peace Over Violence" and any organization, entity, or office under the control or management of Los Angeles County and/or the Los Angeles County Board of Supervisors, including but not limited to the Los Angeles County Metropolitan Transit Authority, from January 1<sup>st</sup>, 2014, to present, in paper or digital form.
2. Any call logs from the "It's off limits" hotline. Call logs are records that contain data pertaining to inbound and outbound calls, such as the time of the call, phone number, and the date, time, call duration, and contact information (for verification of services only) of persons making the call. No private or personal details regarding the discussions of the calls or type of services provided will be obtained.
3. Any written and voice communications or recordings, including, but not limited to, emails (including emails sent via personal accounts), text messages, online communications, letters, writings, voicemails, voice recordings, digital, audio, or video recordings, between "Peace Over Violence" and the Los Angeles County Metropolitan Transit Authority from January 1<sup>st</sup>, 2014 to present.
4. Any internal evaluations or audits concerning the "It's Off Limits" hotline. Internal evaluations or audits provide unbiased, independent reviews of systems, business organizations, and processes.
5. Any letters, emails (including emails sent via personal accounts), recordings, memos, notes, messages, or other communications between the following persons: Philip Washington, Alex Z. Wiggins, Sheila Ann Kuehl, Patricia Ochiuzzo Giggans, Madeleine Moore, Stephanie LaRue, Glen Becerra, Daniel Rodman, Imelda Hernandez, Bob Green and Jennifer Loew from January 1, 2014 up to and including November 15, 2020.
6. Any surveys conducted by MTA referring to the spike or decline in sexual harassment complaints reported from January 1<sup>st</sup>, 2014 to present.
7. Personnel file belonging to Alex Z. Wiggins, including contact information, discipline records (formal or informal) job applications, performance evaluations, letters of recognition, application for employment, resumes, background investigations, criminal and credit history, training records, and forms that relate to transfers and promotion.
8. Any reports, forms, documents, case notes, investigator notes, interview summaries, credibility assessments, photographs, evidence, and findings. As well as all written and voice communications or recordings, including, but not limited to, emails (including emails sent via personal accounts), text messages, online communications, letters, writings, voicemails, voice recordings, digital, audio, or video recordings referring to any internal administrative investigation conducted by the MTA, involving Peace Over Violence.

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1  
2 **The forensic examination of any data found on the above-mentioned computer/digital  
related media for the following information:**

3 **(PEACE OVER VIOLENCE)**

- 4 1. Any and all contracts or agreements, between "Peace Over Violence" and any organization, entity, or office under the control  
5 or management of Los Angeles County and/or the Los Angeles County Board of Supervisors, including but not limited to the  
Los Angeles County Metropolitan Transit Authority, from January 1, 2014 to present, in paper or digital form.
- 6 2. Any call logs from the "It's off limits" hotline. Call logs are records that contain data pertaining to inbound and outbound calls,  
7 such as the time of the call, phone number, and the date, time, call duration, and contact information (for verification of  
services only) of persons making the call. No private or personal details regarding the identity of the caller, discussions of the  
calls, or type of services provided will be obtained.
- 8 3. Any written and voice communications or recordings, including, but not limited to, emails (including emails sent via personal  
9 accounts), text messages, online communications, letters, writings, voicemails, voice recordings, digital, audio, or video  
recordings, between "Peace Over Violence" and the Los Angeles County Metropolitan Transit Authority from January 1, 2014  
to present.
- 10 4. Any internal evaluations or audits concerning the "It's Off Limits" hotline. Internal evaluations or audits provide unbiased,  
11 independent reviews of systems, business organizations, and processes, particularly those involving the number, frequency,  
duration, and results from incoming calls to the POV hotline, and the effectiveness of the hotline.
- 12 5. Any letters, emails (including emails sent via personal accounts), recordings, memos, notes, messages, or other  
13 communications between the following persons: Phillip Washington, Alex Z. Wiggins, Sheila Ann Kuehl, Patricia  
Ochiuzzo Giggans, Madeleine Moore, Stephanie LaRue, Glen Becerra, Daniel Rodman, Imelda Hernandez, Bob  
14 Green and Jennifer Loew from January 1, 2014, up to and including November 15, 2020.
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STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
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**The forensic examination of any data found on the above-mentioned computer/digital related media for the following information:**

**Office of the Inspector General (OIG) of the Los Angeles County Metropolitan Transit Authority**

1. Any reports, forms, documents, case notes, investigator notes, interview summaries, credibility assessments, photographs, evidence, and findings, as well as all written and voice communications or recordings, letters of complaint, allegations of misconduct in either a criminal or administrative manner, including, but not limited to, emails (including emails sent via personal accounts), text messages, online communications, letters, writings, voicemails, voice recordings, digital, audio, or video recordings referring to any **internal administrative investigation** conducted by the MTA, specifically regarding the negotiating, awarding or denying, of any contracts, bids, communications to or from **LA Metro and Peace Over Violence**, or any other business dealings or communications with **Peace Over Violence**, a non-profit entity.



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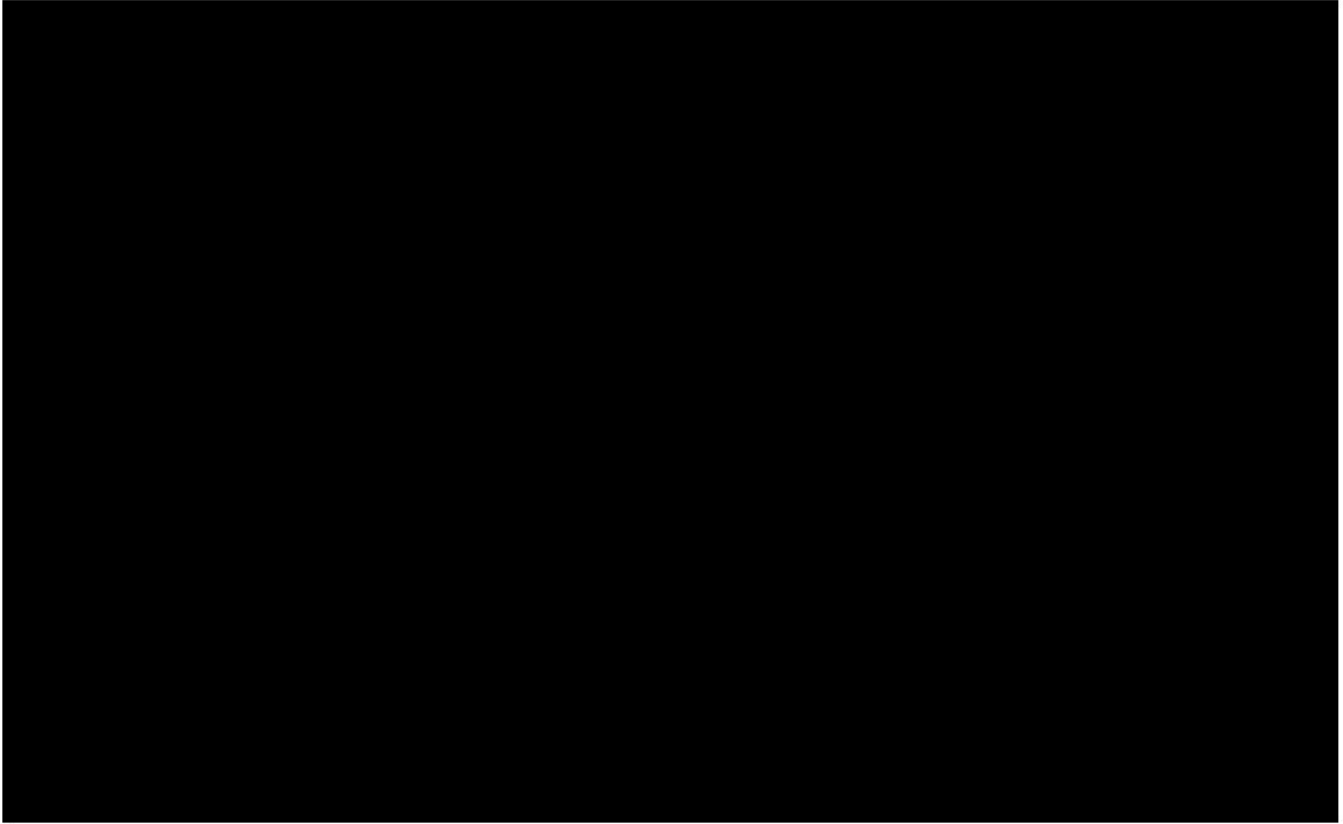
1 **The forensic examination of any data found on the above-mentioned computer/digital**  
2 **related media for the following information:**

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- 4 1. All Electronic mail, Internet browsing histories, cached information, partially deleted files, records, receipts, screen captures,  
5 photographs, logs, printouts, personal identifying information, video images, chat logs, social media communications related  
6 to the Peace Over Violence contract acquisition.
  - 7 2. Any documents, records, programs, or applications tending to demonstrate the actual user(s) of the computers seized.
  - 8 3. Any passwords, password files, test keys, encryption codes or other information necessary to access the Seized Computers,  
9 storage devices or data.
  - 10 4. Any written and voice communications or recordings, including, but not limited to, emails (including emails sent via personal  
11 accounts), text messages, online communications, letters, writings, voicemails, voice recordings, digital, audio, or video  
12 recordings, between "Peace Over Violence" and the Los Angeles County Metropolitan Transit Authority from January 1st,  
13 2014, to present.
  - 14 5. Any letters, emails (including emails sent via personal accounts), recordings, memos, notes, messages, or other  
15 communications between the following persons: Phillip Washington, Alex Z. Wiggins, Sheila Ann Kuehl, Patricia Ochiuzzo  
16 Giggans, Madeleine Moore, Stephanie LaRue, Glen Becerra, Daniel Rodman, Imelda Hernandez, Bob Green and Jennifer  
17 Loew from January 1, 2014, up to present.
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**AFFIANT EXPERTISE**



STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
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4 **Statement of Probable Cause:**

5 Your affiant [REDACTED] is one of the lead detectives assigned to the investigation  
6 currently under review, LASD file #919-00046-2003-441. The case involves an investigation into an  
7 allegation of criminal conduct involving Los Angeles County Board of Supervisor Sheila Ann Kuehl  
8 and 3 “sole source” contracts awarded to a non-profit organization operating under the name “Peace  
9 Over Violence,” (POV).

10 **As previously stated, your affiant is assigned [REDACTED] to the Office of the Undersheriff.  
11 The elected Sheriff of Los Angeles County, Alex Villanueva, has recused himself from this  
12 investigation and has relinquished his authority as Sheriff for this limited purpose, (this  
13 criminal investigation) to the Undersheriff.**

14 This was done to promote transparency and avoid the appearance of impropriety or any future claims  
15 of a tainted or politically motivated inquiry.

16 The website for POV reads, *“Established in 1971 by pioneering feminist activists, Peace Over  
17 Violence is a sexual and domestic violence, intimate partner stalking, child abuse and youth violence  
18 prevention center headquartered in Los Angeles. POV is committed to social service, social change  
19 and social justice. POV’s innovative and comprehensive programs include Emergency, Intervention,  
20 Prevention, Education and Advocacy services and are offered in Los Angeles and the 22 cities within  
21 the West San Gabriel Valley.”*

22 Peace Over Violence has a physical address of 1541 Wilshire Boulevard, Suite 300. Los Angeles, CA  
23 90017 The primary phone number for POV is 213-955-9090. Your affiant is seeking to search this  
24 location for the items sought in this search warrant affidavit.

25 The contract(s) that are the subject of this affidavit were awarded by the Los Angeles County  
26 Metropolitan Transit Authority, (MTA, aka LA MTA, aka LA Metro).

The Los Angeles County Metropolitan Transportation Authority (MTA) is the agency that operates  
public transportation within the greater Los Angeles metropolitan area, including rail, bus, and  
subway lines. It operates the third largest public transportation system in the United States. It has a  
budget of 7.2 billion dollars and receives funds from federal, state, city, and county tax dollars, bonds,  
and fare revenue from riders.

Between the years of 2014-2020, a series of “sole source” contracts were awarded by the MTA to the  
Los Angeles based non-profit organization “Peace Over Violence” totaling over \$890,000.

A sole source contract is a non-competitive procurement that allows a single supplier to fulfill the  
contractual obligations and requirements from, in this case, a public entity / government contractor,  
(MTA).



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2 In federal law, sole source acquisitions are governed by the Federal Acquisition Regulations, part 6  
3 and 13, (FAR).

4 Los Angeles County Code section 2.121 is the body of law that governs the awarding of sole source  
5 contracts by the county, as well as its ancillary agencies or utilities, including the MTA.

6 The MTA website reads as follows: *"In 2015, LA Metro invited Peace Over Violence to partner and  
7 consult with their Communications and Security departments in their efforts to reduce sexual  
8 harassment/assault on public transit. This response was in part due to a survey reporting that 1 in 5  
9 metro riders face unwanted sexual behavior on Metro. They recognized POV's decades of leadership  
10 in the field and trusted expertise in the areas of sexual and domestic violence and emergency  
11 response. POV allowed Metro to use the name of their existing sexual harassment curriculum Off  
12 Limits and informed the message and design development of the initial campaign. Following the  
13 initial success of this collaboration and the high reports of sexual harassment reported in Metro's  
14 How Women Travel survey, we were asked to create a customized sexual harassment hotline for  
15 Metro riders to give an even stronger message that Metro is committed to the safety of their ridership.  
16 This was done through a sole source/no-bid contract initiated internally by LA Metro. The Off Limits  
17 24/7 sexual harassment hotline officially launched in 2017 and continues to run today."*

18 The disputed contracts awarded to POV were to operate a sexual harassment tip-line called the "Off-  
19 limits hotline." The hotline was designed to curb, prevent, and investigate sexual harassment and  
20 assaults occurring on the LA Metro system, by providing an outlet for people to make reports to the  
21 MTA, and ultimately if needed, law enforcement, and receive victim services.

22 **Failures of the "Off-Limits" Hotline:**

23 Fox11 News Los Angeles reported that after a several month-long investigation, they discovered that  
24 an L.A. Metro sexual harassment hotline operated by "Peace Over Violence" is currently costing  
25 taxpayers more than \$8,000 per call. They further established that the Executive Director of "Peace  
26 over Violence" Patricia Giggans is a lifelong friend of (BOS member) Sheila Kuehl. Kuehl currently  
sits on an advisory board for "Peace Over Violence."

A review of call logs, retained for the "Off Limits" hotline, appeared to show more than 1,300 calls to  
the hotline since 2017. As detectives inspected the logs closer, they realized that Peace Over  
Violence (POV) had claimed a successful call for every time the phone rang.

For the first month of the hotline's operation, in January 2017, LA Metro reported the hotline  
received 137 calls, but upon closer inspection, the logs showed every single one of the calls was  
either not applicable, a test, or a hang-up, yet they were still counted in the total.

That trend continued over several years. For example, in October 2019, LA Metro reported that the  
hotline served 27 people for the month, but the true call logs shows that 19 of those calls were hang-  
ups or wrong numbers. Only 8 of the reported 29 calls were legitimate.

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1 Records showed that LA Metro reported 349 calls to the “Off Limits” hotline in 2019, but 260 of  
2 those calls were wrong numbers or hang-ups, 74% of the call volume for the year.

3 In January, before the COVID-19 pandemic, LA Metro reported that the hotline served 18 people for  
4 the month. However, the true call data showed that only two of those calls were about sexual  
5 harassment, related to L.A. Metro.

6 Through August of 2020, records appeared to show that only 13 sexual harassment-related calls had  
7 come into the “Off Limits” hotline for the year. When that number is divided by the cost of the  
8 contract, that low call volume is calculated at costing taxpayers \$8,450 per call.

9 **Government Code 1090 (Conflict of Interest) reads:**

10 *(a) Members of the Legislature, state, county, district, judicial district, and city officers or employees*  
11 *shall not be financially interested in any contract made by them in their official capacity, or by*  
12 *anybody or board of which they are members. Nor shall state, county, district, judicial district, and*  
13 *city officers or employees be purchasers at any sale or vendors at any purchase made by them in their*  
14 *official capacity.*

15 *(b) An individual shall not aid or abet a Member of the Legislature or a state, county, district, judicial*  
16 *district, or city officer or employee in violating subdivision (a).*

17 *(c) As used in this article, “district” means any agency of the state formed pursuant to general law or*  
18 *special act, for the local performance of governmental or proprietary functions within limited*  
19 *boundaries.*

20 The Executive Director of “Peace Over Violence” is **Patricia Ochiuzzo Giggans**.

21 An internet search revealed Patricia Ochiuzzo Giggans is a lifelong close friend of Supervisor Sheila  
22 Kuehl. Communications to and from Giggans, as well as contracts for specific goods or services  
23 further articulated, (in her capacity as the Executive Director of POV) are amongst the items sought in  
24 this affidavit.

25 Patricia Ochiuzzo Giggans married her partner, Ellen Ledley, in a ceremony officiated by (then)  
26 California state Senator Sheila James Kuehl on March 8, 2004

In May of 2004, *The Advocate* (The National Gay and Lesbian News magazine) published an article  
titled “For Better, For Worse, For Us”, authored by Sheila Kuehl.

In the article she (Kuehl) names Patricia Ochiuzzo Giggans as one of her “closest friends in the  
universe”.

An excerpt from the article found online reads:

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1 *Suddenly it was decided: My eight closest friends in the universe--four lesbian couples with whom*  
2 *I've spent birthdays, baby namings, holidays, and, in the case of Torie Osborn, eight happy years a*  
3 *decade or so ago--were (sic) going to San Francisco to get married.*

4 *Jackie and Sharon, Torie and Lyd, Jehan Agrama and Dwora Fried, Patti Giggans and Ellen Ledley,*  
5 *Barrie Levy and Linda Garnets, children and friends, and Patti's sensei--to give rite Buddhist*  
6 *blessing--filled nearly half a plane from Los Angeles.*

7 *At City Hall, County Assessor Mabel Teng--an enthusiastic, supportive public servant who herself*  
8 *performed the city's first same-sex marriage, between Phyllis Lyon and Del Martin--led us through*  
9 *the paperwork*

10 Your affiant found a photograph online depicting Sheila Kuehl and Patricia Giggans taken on election  
11 night at Sheila Kuehl's nomination party. The photograph was posted on "Facebook" by Patricia  
12 Giggans on November 4th, 2014.



16 Another photograph was discovered depicting LA County Board of Supervisor member Sheila Kuehl  
17 and the Executive Director of Peace Over Violence Patti Giggans (pictured alongside her longtime  
18 partner, Ellen Ledley) during an honoring of POV and Patti Giggans for her life of dedication and  
19 activism. The photograph was dated April 28th, 2015.



24 A photograph titled: "LA County Board of Supervisors Sheila Kuehl and Executive Director of Peace  
25 Over Violence Patti Giggans attended the 44th Annual Peace Over Violence Humanitarian Awards at  
26 Dorothy Chandler Pavilion on October 16, 2015, in Los Angeles, California", was found during an  
online search.



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8 According to the “Peace Over Violence” website, **Sheila James Kuehl** (aka Sheila Kuehl aka Sheila  
9 Ann Kuehl) currently holds a position on the advisory board for “Peace Over Violence.”

10 An advisory board is a volunteer group formed to give advice and support to a nonprofit's board of  
11 directors or executive staff. Advisory boards are often established to involve prospective donors,  
12 offering them a forum to give advice as well as donate, fundraise and to provide input on the  
13 organization's work.

14 In addition to being the Executive Director of Peace Over Violence, **Patricia Giggans** is an appointed  
15 member of the Los Angeles Sheriff's Department's Civilian Oversight Commission, (COC). This is a  
16 paid position. The nine members of the Civilian Oversight Commission are appointed by the five  
17 member Los Angeles County Board of Supervisors. **Sheila Kuehl** is one of the five elected members  
18 of the Board of Supervisors. The commission was created pursuant to Los Angeles County Code  
19 3.479 in 2016.

20 The Civilian Oversight Commission is a group of citizens acting in a watchdog / advisory role over  
21 the operations, practices, and policies of the Los Angeles Sheriff's Department. They have been given  
22 power of subpoena and are guided and counseled by the Inspector General of the Sheriff's  
23 Department, Max Gustaf Huntsman, an attorney appointed by the Board of Supervisors.

24 **Patricia Giggans** was appointed personally to the commission by Supervisor **Sheila Kuehl**.

25 According to the LA County. Civilian Oversight Commission biography page, **Patricia Giggans'**  
26 expertise to be on the Commission, which oversees the sheriff's department's policies and practices,  
is a master's degree in “Non-profit Management” and a black belt in Karate.

Of the nine commission appointees, **Patricia Giggans** and Pastor Xavier Thompson (a Mark Ridley  
Thomas appointee) are the only two without any type of law enforcement experience, nor a law  
degree. Pastor Xavier Thompson is a well-respected longtime community faith leader, who can speak  
directly to the community members the LA County Sheriff's Department serves. It remains unknown  
what value **Patricia Giggans** has to offer the community as a paid appointee of the Civilian Oversight  
Commission.



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1 Below is a photo depicting the Civilian Oversight Commission. **Patricia Giggans**, Executive Director  
2 of Peace Over Violence (center), appointed by Supervisor **Sheila Kuehl** (standing right to  
3 Commissioner **Giggans**).



9 Copies of an email chain between Fox TV Los Angeles news reporter Bill Melugin, and LA County  
10 Supervisor's Office Communications Director (3<sup>rd</sup> District) Barbara Osborn, have been retained by  
11 detectives (Attachment A).

12 During this email chain the Communications Director was asked about Sheila Kuehl's Civilian  
13 Oversight Commission appointee Patricia Giggans. Her response:

14 *"Supervisor Kuehl selects her nominees for appointment on one standard: excellence. Patti Giggans  
15 is one of LA County's most respected leaders on violence prevention, the role of law enforcement in  
16 prevention and fighting violence against women. She is a recipient of the California Peace Prize.  
17 Peace Over Violence, the nonprofit she has led for decades, is the preeminent organization working  
18 to end sexual assault and domestic/intimate partner violence in LA County".*

19 *"Over nearly 40 years of collaboration on shared policy priorities and work to end violence against  
20 women, Supervisor Kuehl has had ample opportunity to witness Giggans' leadership, problem-  
21 solving skills and the respect she has garnered from a range of communities. The Supervisor  
22 appointed Giggans to the Civilian Oversight Commission because of her leadership, deep  
23 understanding of the issues, track record and judgment, and evidently the other Commission members  
24 agreed, because they elected Giggans chair of that body. Twice".*

25 *"Any person may give \$1500 in primary elections and another \$1500 in the general. Giggans  
26 supported Supervisor Kuehl's 2014 campaign, as did several thousands of others. Giggans  
contributed \$1500 for her primary campaign and then, six months later, another \$1500 for the  
general election".*

In the email response from Sheila Kuehl's Communication Director, she stated a collaboration on  
shared policy priorities and work, between Sheila Kuehl and Patricia Giggans, for "over nearly 40  
years." She also stated \$3,000 in campaign contributions were donated from Patricia Giggans to  
Sheila Kuehl, confirming a previous relationship, and monetary donations, between the Metro Board  
of Directors member, and the Peace Over Violence Director.

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1 Your affiant has obtained a copy of the Ethics Declaration (Attachment B), signed by Patricia  
2 Giggans, which reads:

3 *The Following questions in Section D below are designed to ensure contractors, subcontractors and*  
4 *Metro, including its employees and Board of Directors, can comply with their obligations to avoid*  
5 *conflicts of interest issues.*

6 *For purposes of this Ethics Declaration, the term "Employee(s)" shall be defined as employees,*  
7 *officers, shareholders, partners, owners, or directors of Declarant Company.*

8 *Question #1:*

9 *In the past 12 months, has any employee been a Metro Board member or Metro employee?*

10 *Question #3*

11 *Is any employee presently a Metro Board member or metro employee?*

12 *Question #6*

13 *In the past 4 years, has any employee or family member of any employee, made any campaign*  
14 *contributions to any present Metro Board member or Metro employee?*

15 Patricia Giggans answered "no" to the above questions.

16 The last section reads:

17 *"I Patricia Giggans, on behalf of Peace Over Violence at which I am employed as Exec Dir/CEO,*  
18 *declare that after having made or caused to be made reasonably diligent investigation regarding the*  
19 *Declarant Company, the foregoing responses, and the explanation on the attached sheet(s), if any, in*  
20 *response to question 10, are correct to the best of my knowledge and belief. Further, I understand*  
21 *that failure to answer the questions in good faith or providing materially false answers may subject*  
22 *Declarant Company to consequences up to and including disqualification of its Bid/Proposal."*

23 The signature at the bottom reads: "*Patricia Giggans*"

24 In fact, Sheila Kuehl is a Metro Board member, and a board member of the Peace Over Violence  
25 advisory board, according to this Ethics Declaration, an obvious conflict of interest.

26 **California Penal Code Section 115 PC: Filing A False Document**

1. Definition and Elements of the Crime

Filing a False Document under California Penal Code Section 115 PC makes it a felony to file any  
forged or false document with a public office.

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1 The statute requires a prosecutor to prove the following elements:

- 2 1. A defendant provided a document for filing, recording or registration with any public office in  
3 California  
4 2. The defendant knew that the document was false or a forgery when he or she filed it AND  
5 3. The document was one that, if genuine, could be legally filed.

6 The term "document" has been interpreted broadly by courts and prosecutors. The statute is most  
7 frequently used to prosecute the filing of false property deeds in connection with real estate fraud  
8 schemes. However, filing a False Document charge can involve almost any document that can be  
9 legally filed in a public office, including bail bonds, probation work referrals, and even fishing  
10 records.

11 **Perjury 118 P.C.**

12 (a) Every person who, having taken an oath that he or she will testify, declare, depose, or certify truly  
13 before any competent tribunal, officer, or person, in any of the cases in which the oath may by law of  
14 the State of California be administered, willfully and contrary to the oath, states as true any material  
15 matter which he or she knows to be false, and every person who testifies, declares, deposes, or  
16 certifies under penalty of perjury in any of the cases in which the testimony, declarations, depositions,  
17 or certification is permitted by law of the State of California under penalty of perjury and willfully  
18 states as true any material matter which he or she knows to be false, is guilty of perjury.

19 Sheila Kuehl is one of the 13 members of the LA Metro Board of Directors, as are the other four  
20 elected supervisors on the Los Angeles County Board of Supervisors.

21 The conduct of Kuehl under this investigation arose as a result of her (dual) duties as an appointed  
22 member of the Los Angeles County Metropolitan Transit Authority, as well as her elected position on  
23 the Los Angeles County Board of Supervisors.

24 The personal relationship between Kuehl and Giggans was one of the factors causing a  
25 "whistleblower" complaint to question whether there may be a conflict of interest, and whether a  
26 singular or numerous "sole source" contract(s) were legally transacted, between LA Metro and "Peace  
Over Violence" using the protocols established in Los Angeles County Code section 2.121(laws that  
govern the county contracting with private businesses).

The original complainant who brought this matter to the attention of the Los Angeles Sheriff's  
Department was [REDACTED], (hereafter referred to as the witness).

The witness is an employee of the MTA and has worked there for over 4 years, as a project manager  
in the law enforcement and security division. The witness has a law degree but is not a practicing  
attorney.

Your affiant has spoken to the witness on several occasions, and she has related the following facts.

Phillip Anthony Washington, MB/1-17-58, was until May of 2021, the CEO of the MTA, (an 11,000-  
member public transportation utility).



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1 The witness said that the MTA is funded by tax dollars, fares, other lesser sources of revenue, as well  
2 as (federal and state) grants. The MTA board of directors is composed of 13 members, one of whom  
3 is always the mayor of the city of Los Angeles, and three of his appointees. The other board members  
4 always include the five elected members of the Los Angeles County Board of Supervisors (BOS). The  
5 remaining four MTA board members are usually selected from within the local government  
community, like elected officials from smaller cities (with an MTA route within its confines) like  
Glendale or Pasadena.

6 The witness stated that CEO Phillip Washington directly skipped the traditional hiring process for  
7 several current MTA employees, including Sandra Solis, Vilma Jones, Alex Z. Wiggins, Jon Gordon,  
8 Patricia Martin, (her husband) Harold Martin, (their daughter) Ashley Martin, and Joyce Burrell  
9 Garcia. Alex Wiggins was the former head of law enforcement and security for the MTA and was a  
direct supervisor for the witness. His communications during the scope of his employment are  
amongst the items sought in this affidavit.

10 The witness indicated that a "sole source contract" (in MTA parlance) is a transaction involving the  
11 MTA hiring an outside vendor for a particular product or service, without the traditionally accepted  
12 practice of accepting bids from a variety of vendors and having a panel or board of people screen the  
bid for the most economical and advantageous entity to contract with.

13 The witness explained that "sole source contracts" are not the normal protocol for purchasing goods  
or services by the MTA and are exceptional in nature.

14 A "sole source contract" is normally accompanied by a document indexed under MTA form number  
15 1.0.9, entitled "*JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION –*  
*JUSTIFICATION FOR EXCEPTION TO FULL AND OPEN COMPETITION*" (Attachment C).

16 Included on this form is a "*description of the supplies or services required, the estimated price, the*  
17 *statutory authority permitting other than full and open competition*", and a check off box section  
18 giving the reader a choice of reasons why the sole source contract is the appropriate choice when it is  
a "service" that is being purchased, as opposed to a product.

19 The document also reads: "*A. For purchases of services use one of the following (check the*  
20 *appropriate citation): The services are available only from a single source based on a unique*  
21 *capability or availability. The property or services are available from one source if one of the*  
*conditions described below is present:*

22 *Unique or Innovative Concept. The offeror (sic) demonstrates a unique or innovative concept or*  
*capability not available from another source.*

23 *Unique or innovative concept means a new, novel, or changed concept, approach, or method that is*  
24 *the product of original thinking, the details of which are kept confidential or are patented or*  
25 *copyrighted and is available to Metro only from one source and has not in the past been available to*  
26 *the Metro from another source."*

The witness provided copies of three MTA contracts, dated 8-1-16, 11-14-17, and 2-5-19.

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1  
2 The 8-1-16 contract is entitled "*JUSTIFICATION FOR EXCEPTION TO FULL AND OPEN*  
3 *COMPETITION*" and is five pages long. It is signed by Alex Z. Wiggins and is indexed under  
4 "Requisition # 18755". This contract awards \$160,000,00 to an organization known as Peace Over  
5 Violence. The name under the organization's title is Patti Occhiuzzo Giggans. A phone number of  
(213)-955-9090 x 103 and the email of [patti@peaceoverviolence.org](mailto:patti@peaceoverviolence.org) is provided on the face page of  
this contract.

6 The service provided for in this contract appears to be a sexual harassment hotline as well as  
7 counseling and outreach assistance to victims of sexual harassment or assault while riding on the  
8 MTA. This particular contract has a breakdown of the positions, salaries, and duties for seven  
employees of Peace over Violence (POV), needed to service this hotline/counseling service.

9 The contract dated 11-14-17 is titled, "*JUSTIFICATION FOR OTHER THAN FULL AND OPEN*  
10 *COMPETITION, JUSTIFICATION FOR EXCEPTION TO FULL AND OPEN COMPETITION*". The  
document is signed by Alex Z. Wiggins and awards \$160,000.00 to Peace Over Violence / Patti  
Occhiuzzo Giggans.

11 Amongst the items sought in this affidavit are various communications and emails to and or from  
12 Alex Z. Wiggins, in his (former) role as chief of the law enforcement and security division at the  
13 MTA.

14 The services provided for this fee indicate "*The hotline will run 24 hours/day, 7 days a week, and be*  
15 *staffed by trained advocates from POV. Additionally, the answering services will dispatch callers*  
16 *(sic) to be trained advocates and provide part-time case management and in person consultation.*  
17 *POV will prepare data and transmit reports to Metro as well*".

18 The contract dated 2-15-19, is eight pages long, and entitled "*JUSTIFICATION FOR OTHER THAN*  
19 *FULL AND OPEN COMPETITION – JUSTIFICATION FOR EXCEPTION TO FULL AND OPEN*  
20 *COMPETITION*". This contract is signed by Alex Z. Wiggins.

21 This contract is for \$496,000.00 for three years of services and like the previous contracts, is awarded  
22 to "Peace Over Violence, Patti Occhiuzzo Giggans", with an address of 1015 Wilshire Blvd. Suite  
23 200, Los Angeles, Ca. 90017, with the same phone number and email address as the previous  
24 contract.

25 At the beginning of 2021 the Peace Over Violence Headquarters were relocated to 1541 Wilshire  
26 Blvd, Suite 300 Los Angeles, Ca. 90017.

Amongst the locations to be searched for the items enumerated in this affidavit are the offices  
operated by POV, located at 1541 Wilshire Blvd., Suite 300, Los Angeles, CA 90017. Your affiant  
has personally confirmed that as of August 2022, this is the active address for Peace Over Violence.

Your affiant believes that the items sought will be located at this location.

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1 The services provided for in this contract appear to be the same as those previously described, with a  
2 bit more detail about the Peace Over Violence organization, its history, and the other “*notable clients*  
3 *and services the POV currently provides and/or has provided in (sic) are: LA County Sheriff’s*  
4 *Department since 2017, Police Department & Hospital Advocacy Line, LA County District Attorney,*  
*LA Times, Pasadena YMCA, and Other rape crisis centers”.*

5 Copies of these three contracts, totaling \$816,000.00, will be attached to this affidavit and marked as  
6 (Attachment D)

7 The Witness stated that it was her opinion, that although there was no legitimate reason for Metro to  
8 outsource such a service to POV in a sole source contract, the contract was pushed forward by CEO  
9 Phillip Washington in order to remain “in good graces” with Supervisor Sheila Kuehl. Besides being  
10 one of the five elected Supervisors managing Los Angeles County governmental operations, Kuehl is  
11 also one of the 14 members of the MTA Board of Directors, overseeing the MTA’s operations. In her  
12 dual capacities as an elected Supervisor and as a member of the MTA board, she is a direct supervisor  
13 of Phillip Washington.

14 Sheila Kuehl is a close lifelong friend of Peace Over Violence Director Patricia Giggans. Although  
15 the program was a complete failure, the contract was extended for 3 additional years without  
16 competitive bid, nor analysis.

17 In 2015, the Witness, who was the project manager at the time, noticed a \$75,000 bill from Peace  
18 Over Violence come across her desk. Having knowledge that no official contract or agreement had  
19 been authorized, she confronted CEO Phillip Washington about the bill.

20 The Witness stated Phillip Washington ordered her to pay the bill. He stated he’d rather not upset any  
21 of Supervisor Sheila Kuehl’s friends, than dispute the veracity of the bill. By friend, the Witness  
22 stated she felt that he was referring to Patricia Giggans (who is not only a dear friend of Supervisor  
23 Kuehl, but also the Director of Peace over Violence). The Witness further stated that Phillip  
24 Washington told her directly, that he would rather pay the \$75,000, so he could later use that to his  
25 advantage when he needed a political favor from Supervisor Sheila Kuehl.

26 The Witness was then ordered by Phillip Washington to pay the bill through the purchase order  
process, which is normally reserved for office supplies. She stated this was done to avoid having the  
members of the LA Metro Board of Directors report campaign contributions they had previously  
received from members of Peace Over Violence.

The witness stated that if the friendship between Supervisor Kuehl and Patricia Giggans was made  
public, or the fact that Supervisor Kuehl received campaign contributions from Patricia Giggans,  
Supervisor Kuehl, by law, would have to recuse herself from any dealings involving monetary  
contracts with Peace Over Violence.

Instead, the bill was paid using the purchase order process. This was done to avoid any chance of an  
auditor noting the large unauthorized payment.

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1 In 2014, Sheila Kuehl was elected to the Los Angeles County Board of Supervisors. Five months into  
2 her first term a sole-source purchase was made using taxpayer money to start the "Off Limits"  
3 marketing campaign. This sole source contract between LA MTA and POV is amongst the items  
4 sought by your affiant. The witness was unable to provide your affiant with a complete copy of this  
document, and it is amongst those sought in this warrant.

5 The witness indicated that it was highly unusual and contrary to normal operating practices within the  
6 MTA for a sole source contract to be awarded for a service or product that is so common and ordinary  
as a sexual assault/harassment hotline.

7 This service is available in a variety of public marketing arenas, and there is nothing unique,  
8 remarkable, or extraordinary about operating a hotline. The witness stated that such a service is not  
9 copyrighted nor exclusive enough to justify a sole source contract, dis-allowing open competitive  
bidding.

10 The witness believes that this (awarding of the sole source contracts in return for campaign donations  
11 and indebtedness to the office holder) is a classic example of "quid pro quo" (favor for a favor)  
arrangement between Patricia Giggans and Sheila Kuehl, which would enrich both of their lives.

12 During a quick internet search your affiant discovered numerous other organizations, within LA  
13 County, that provide a similar service to the "Its Off Limits" hotline. Many of these organizations  
14 provide a sexual harassment hotline for zero cost to taxpayers, none of which were given an  
15 opportunity to enter a competitive bid. By skipping the traditional accepted practice of obtaining bids  
16 from a variety of venders, and entering a "Sole Source" contract, the MTA unnecessarily spent  
hundreds of thousands of taxpayer dollars. Examples of viable organizations include: 1736 Family  
Crisis Center, Jenesse Center, and Project Peacemakers incorporated.

17 Detectives on this case uncovered an email chain between an LA County Metro Project Manager and  
18 Bob Green (LA Metro Chief of Systems Security & Law Enforcement). The email discusses a  
19 conversation between the project manager and Mariam El-menshawi (Director of Victims of Crime  
Resource Center) (Attachment E).

20 The email reads:

21 *"Today I received confirmation from Mariam El-menshawi of the Victims of Crime Resource Center  
22 that they would be able to handle call loads and referrals from officers and victims of sexual  
23 harassment."*

24 *"Their program provides (hotline support and legal assistance 6 days a week: 8am-5pm Monday  
25 through Friday and Saturday 9am to 12pm. As noted in previous interoffice memos, the hotline  
26 services would be at no cost to Metro through the California Office of Emergency Services and cover  
a portfolio of services that include legal help for those seeking restraining order, mental health  
support, support against human trafficking etc."*



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The witness indicated that she believes a part of the reason she was retaliated and harassed at her workplace, (MTA) is because she pointed this conduct out to her supervisors and others, expressing that it was not only immoral and unethical, but almost assuredly a breach of the law.

She believed, and the evidence sought by your affiant **may** prove, that there was a “corrupt agreement” between Kuehl and Giggans to award and receive the sole source contracts in return for campaign donations, political power, and continued opportunities to enrich each other in a variety of other ways.

**Campaign contributions:**

A search of the LA County Register-Recorder website revealed four (4) members of the “Peace Over Violence” Advisory board, including Patricia Giggans, made several campaign contributions to Los Angeles County Board of Supervisor Sheila Kuehl totaling over \$7,000.

Making a personal campaign contribution to a candidate for elected office is of course in and of itself not a crime, however, because a sole source contract was awarded to Peace Over Violence, bypassing the usual protocols for purchasing services by the MTA, the donations can be seen as having been given for payment in return for the future awarding of the “Its Off Limits” contracts. This violates several laws and resembles a “quid pro quo” arrangement between Patti Ochiuzzo Giggans and Supervisor Sheila Kuehl.

Date	Contributor*	Candidate or Officeholder	Schedule (Type)	Amount *
02/04/13	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 01/01/13-06/30/13	\$1,500.00
02/19/13	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 01/01/13-06/30/13	(\$1,500.00)
03/28/13	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 01/01/13-06/30/13	\$1,500.00
06/30/14	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 05/15/14-06/30/14	\$100.00
05/28/14	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 05/15/14-06/30/14	\$200.00
05/12/14	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 03/11/14-05/11/14	\$100.00
04/07/14	Patricia Giggans (Executive Director, Peace Over Violence)	Sheila Kuehl 1355019 - Kuehl For Supervisor 2014	A - Monetary (DIO - Individual) Period: 03/11/14-05/11/14	\$100.00
<b>Total Monetary Contributions (A):</b>				<b>\$7,000.00</b> <small>(Does not include endorsements)</small>
<b>Total Amount Received:</b>				<b>\$7,000.00</b>

Pamela Sue Palmer, SBN 107590, an attorney on the Advisory Board of Peace over Violence also made campaign contributions to **Sheila Kuehl**

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Date	Contributor	Candidate or Officeholder	Schedule (Type)	Amount
01/08/20	Pamela Palmer <small>(Partner, Pepper Hamilton LLP)</small>	John Harabedian <small>1419619 - John Harabedian for Supervisor 2020</small>	A - Monetary <small>(100 - Individual) [Period: 01/01/20-01/31/20]</small>	\$100.00
03/31/14	Pamela Palmer <small>(Attorney, Lathan &amp; Workins LLP) INTERMEDIARY, ActBlue</small>	Sheila Kuehl <small>1355019 - Kuehl For Supervisor 2014</small>	A - Monetary <small>(100 - Individual) [Period: 03/18/14-03/31/14]</small>	\$100.00
03/31/14	Pamela Palmer <small>(Attorney, Lathan &amp; Workins LLP) INTERMEDIARY, ActBlue</small>	Sheila Kuehl <small>1355019 - Kuehl For Supervisor 2014</small>	A - Monetary <small>(100 - Individual) [Period: 03/18/14-03/31/14]</small>	\$50.00
<b>Total Monetary Contributions (A):</b>				<b>\$250.00</b> <small>(does not include utilities id)</small>
<b>Total Amount Received:</b>				<b>\$250.00</b>

Retired California Deputy Attorney General and current member of the Peace over Violence Advisory Board, Elaine F. Tumonis, made the following campaign contributions to Sheila Kuehl.

[Page: 1]

Date	Contributor	Candidate or Officeholder	Schedule (Type)	Amount
07/22/13	Elaine F. Tumonis <small>(Attorney, CA Attorney General's Office)</small>	Sheila Kuehl <small>1355019 - Kuehl For Supervisor 2014</small>	A - Monetary <small>(100 - Individual) [Period: 07/01/13-12/31/13]</small>	\$500.00
09/02/14	Elaine F. Tumonis <small>(Attorney, CA Attorney General's Office)</small>	Sheila Kuehl <small>1355019 - Kuehl For Supervisor 2014</small>	A - Monetary <small>(100 - Individual) [Period: 07/01/14-09/30/14]</small>	\$1,500.00
11/18/15	Elaine F. Tumonis <small>(Attorney, CA Attorney General's Office)</small>	Sheila Kuehl <small>1355019 - Kuehl For Supervisor 2014 Officeholder Account</small>	A - Monetary <small>(100 - Individual) [Period: 07/01/15-12/31/15]</small>	\$250.00
<b>Total Monetary Contributions (A):</b>				<b>\$2,250.00</b> <small>(does not include utilities id)</small>
<b>Total Amount Received:</b>				<b>\$2,250.00</b>

Jehan Agrama also sits on the Advisory board of Peace Over Violence. She made the following contributions:

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Date	Contributor	Candidate or Officeholder	Schedule (Type)	Amount
05/08/14	Jehan Agrama (President, Harmony Gold)	Jim McDonnell 2362923 - McDonnell for LA County Sheriff 2014	A - Monetary (DID - Individual) (Period: 02/18/14 - 09/17/14)	\$100.00
09/26/18	Jehan Agrama (Media Executive, Harmony Gold)	Jeffrey Prang Assessor 1396528 - Jeffrey Prang for Assessor 2018	A - Monetary (DID - Individual) (Period: 09/23/18 - 10/20/18)	\$100.00
09/30/14	Jehan Agrama (media executive, Harmony gold) INTERMEDIAR: Active	Sheila Kuehl 235019 - Kuehl For Supervisor 2014	A - Monetary (DID - Individual) (Period: 07/01/14 - 09/30/14)	\$200.00
10/18/14	Jehan Agrama (media executive, Harmony gold)	Sheila Kuehl 235019 - Kuehl For Supervisor 2014	A - Monetary (DID - Individual) (Period: 10/01/14 - 10/18/14)	(\$200.00)
10/18/14	Jehan Agrama (media executive, Harmony gold) INTERMEDIAR: Active	Sheila Kuehl 235019 - Kuehl For Supervisor 2014	A - Monetary (DID - Individual) (Period: 10/01/14 - 10/18/14)	\$1,500.00
01/28/13	Jehan F. Agrama (Executive, Harmony Gold)	Sheila Kuehl 235019 - Kuehl For Supervisor 2014	A - Monetary (DID - Individual) (Period: 01/01/13 - 04/30/13)	\$1,500.00
02/19/13	Jehan F. Agrama (Executive, Harmony Gold)	Sheila Kuehl 235019 - Kuehl For Supervisor 2014	A - Monetary (DID - Individual) (Period: 01/01/13 - 04/30/13)	(\$1,500.00)
03/04/13	Jehan F. Agrama (Executive, Harmony Gold)	Sheila Kuehl 235019 - Kuehl For Supervisor 2014	A - Monetary (DID - Individual) (Period: 01/01/13 - 04/30/13)	\$1,500.00
<b>Total Monetary Contributions (A):</b>				<b>\$3,200.00</b>
<b>Total Amount Received:</b>				<b>\$3,200.00</b> <small>(does not include unitemized)</small>

Metro Board of Director's Code of Conduct is legislated in the California Public Utility's Code section 130660(a), which states in part: *"Board members or their staff are prohibited from soliciting or accepting any gift from MTA contractors or from persons or entities that have submitted a proposal or bid for an MTA contract"*.

California Government Code section 89502 reads in part, *"...No elected state officer, elected officer of a local government agency, or other individual specified in Section 87200 shall accept any honorarium..."*

California Government Code section 1222 reads, *"Every wilful omission to perform any duty enjoined by law upon any public officer, or person holding any public trust or employment, where no special provision is made for the punishment of such delinquency, is punishable as a misdemeanor"*.

This section is at times referred to as a "Breach of Public Trust" crime. Your affiant believes it is possible that the conduct described within this affidavit particularly that articulated above, may fall within this category.

Amongst the items sought in this affidavit from MTA as well as POV, are any emails, notes, letters, proposals, contracts, or other communications between Patricia Giggans and Sheila Kuehl, as well as other unknown/identified parties at this time concerning the awarding of sole source contract(s) for the sexual assault/harassment hotline to be operated by POV on behalf of the MTA.

Normally a contract would be awarded as a result of competitive bidding. Competitive bidding is a process of issuing a public bid with the intent that vendors will put together their best proposal and compete for a specific project. By law, this process is required for every government agency that issues a bid. Competitive bidding creates a transparent environment that is open and fair.

This essentially means that any vendor, regardless of their company size, annual revenue or other similar factors, will be welcomed to the bidding process and will be given a fair chance as the rest of the competition.



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1  
2 A sole source contract implies that there is only one vendor that can provide the contractual services  
3 needed and that any attempt to obtain bids would only result in one vendor being available to meet the  
4 need.

5 Los Angeles County Code section 2.121 reads in part, "*This Chapter 2.121 shall not apply to the  
6 contracting with private business to perform personal services when:*

7 *1. Authority to contract is expressly provided by statute.*

8 *2. The service cannot be performed adequately or competently or satisfactorily by civil service  
9 employees, and it is impossible to recruit such personnel to perform such service for the period of  
10 time such service is needed by the county.*

11 *3. The service is of an extraordinary professional or technical nature and the services are of a  
12 temporary nature.*

13 *4. The services are needed on a part-time or intermittent basis; or*

14 *5. The contract is for personal services to provide an independent analysis/evaluation, review and/or  
15 audit of an existing or proposed county project, function or program, and there is a need or  
16 contractual obligation to obtain an independent analysis, evaluation, review and/or audit of said  
17 project, function or program.*

18 *This chapter shall not apply to the purchase, lease or acquisition of materials, supplies, furnishings,  
19 equipment, and other personal property".*

20 The county code allows for the purchase of goods or services through three distinct processes,  
21 detailed in code sections 2.121.310.

22 This code section indicates that contracts may be awarded by "*competitive sealed bidding,  
23 competitive negotiation, or non-competitive negotiation*".

24 It is further codified that "*a contract may be made by noncompetitive negotiation only when  
25 competition is not feasible, as determined in writing prior to award by the department recommending  
26 the award of a contract*".

Your affiant is seeking to seize, (as articulated in this affidavit), and believes that Peace Over  
Violence is currently in possession of all contracts or agreements between Peace Over Violence and  
any organization, entity, office, or agency under the control or management of Los Angeles County  
and/or the Los Angeles County Board of Supervisors, and/or the Los Angeles County Metropolitan  
Transit Authority, from January 1, 2014, to present.

Your affiant believes that these items will have evidentiary value in determining culpability, intent, a  
possible corrupt agreement between the parties, and motive in this case. This evidence will also assist  
by displaying a pattern of past conduct as described in California Evidence Code section 1101 (b).

Your affiant believes that by obtaining all call logs from the "It's Off limits" hotline, operated by  
POV, coupled with monthly and annual audits, he will be able to inculcate or exculpate the identified  
parties accused of criminal conduct regarding the expenditure of funds used to initiate and operate the  
hotline.



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1 Also, your affiant believes that by examining these documents, they may in fact provide exculpatory  
2 evidence and would potentially provide a legitimate reason for the yearly renewal by LA MTA of the  
3 "It's Off Limits" contracts to POV.

4 The witness provided your affiant with a copy of an email from Madeleine Moore (Deputy for Special  
5 Projects for Supervisor Sheila Kuehl) dated Friday, February 12<sup>th</sup>, 2016 (Attachment F).

6 The email was addressed to Patti Giggans (Director of Peace Over Violence), Alex Wiggins (Chief of  
7 the law enforcement and security division at the MTA), Stephanie LaRue Burke (Principal  
8 Development Specialist for the MTA), Glen Becerra (MTA Executive Officer of Marketing), and  
9 Daniel Rodman (Transportation Advisor to L.A. Mayor Eric Garcetti).

10 The email starts with "Hi everyone, it was great meeting together a couple weeks ago" and then goes  
11 on to discuss the budget planning for the "It's off Limits" hotline.

12 Based on the information provided within this email, your affiant believes the people listed in this  
13 email have participated in discussions relating to the planning and budgeting of the "It's Off Limits"  
14 hotline.

15 Your affiant is seeking all written and voice communications or recordings, including but not limited  
16 to emails, text messages, online communications, letters, writings, voicemails, and voice recordings,  
17 between Peace Over Violence and Los Angeles Metro from January 1, 2014, to November 15, 2020.

18 Your affiant is also seeking all letters, emails (including emails sent via personal accounts),  
19 recordings, memos, notes, messages, or other communications between the following persons; Philip  
20 Washington, Alex Z. Wiggins, Sheila Ann Kuehl, Patti Ochiuzzo Giggans, Madeleine Moore,  
21 Stephanie LaRue, Glen Becerra, Daniel Rodman, and [REDACTED] from January 1, 2014 up to and  
22 including November 15, 2020, as your affiant believes, it has evidentiary value in determining a past  
23 pattern of conduct as well as intent, in this investigation.

24 The witness provided detectives with an email chain which was originated by the Chief  
25 Administrative Analyst of the Systems Security and Law Enforcement section of the MTA (Imelda  
26 Hernandez). The email was dated March 24<sup>th</sup>, 2020 and was sent to all the directors and managers  
attempting to address new protocols to ensure better tracking and oversight of contracts and purchase  
orders.

The witness stated prior practices of contract purchasing were "sloppy and lacked appropriate  
oversight". She believes these practices led to contracts being inappropriately awarded as political or  
personal favors.

On May 7<sup>th</sup>, 2020, the witness authored an "inter-office memo" addressed to Bob Green Chief of  
Systems Security and Law Enforcement section of the MTA. In the memo she wrote "Moreover, it is  
concerning that Metro engaged in multiple sole source contracts with Peace Over Violence at the  
direction of management and the Board of Directors without disclosing personal relationships and  
when a simple internet search demonstrates that all social services initiatives, including Peace Over  
Violence could have been provided at no cost to the agency."

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1  
2 On May 8<sup>th</sup>, 2020, Bob Green emailed the witness and wrote:

3 “I noted in the last paragraph that you identify potential misconduct. I have forwarded your concerns  
4 in the memo to be investigated”.

5 The witness indicated that she believed Green forwarded the complaint to the Inspector General of the  
6 MTA.

7 Your affiant is seeking any reports, forms, documents, case notes, investigator notes, interview  
8 summaries, credibility assessments, photographs, audio recordings, physical, forensic, testimonial, or  
9 circumstantial evidence, and findings, as well as all written and voice communications or recordings,  
10 including, but not limited to, emails (including emails sent via personal accounts), text messages,  
11 online communications, letters, writings, voicemails, voice recordings, digital, audio, or video  
12 recordings referring to any internal administrative investigation conducted by the MTA, including,  
13 but not limited to, the office of the Inspector General of The Los Angeles County Metropolitan  
14 Transit Authority, involving Peace Over Violence.

15 Office of the Inspector General (OIG) of the Los Angeles County Metropolitan Transit Authority

16 Your affiant is aware that Public Utilities Code section 130051.28 was enacted and allowed for the  
17 Los Angeles County Metropolitan Transit Authority to appoint an Inspector General, hereafter  
18 referred to as OIG, (Office of the Inspector General). All references in this affidavit, unless  
19 otherwise noted, are to the Los Angeles County Metropolitan Transit Authority Office of the  
20 Inspector General, (OIG).

21 The OIG performs oversight of the MTA and conducts investigations and audits. The OIG keeps the  
22 Metro Board and CEO of Los Angeles County fully informed about issues affecting Metro programs,  
23 operations, and opportunities for improvement.

24 The OIG for LA Metro is Attorney Karen Gorman, SBN # 88078, with MTA offices located at 818  
25 West 7 th Street, 5 th floor, Los Angeles, 90017. This location is one of the depositories for the  
26 records and documents sought by your affiant and is described in detail within this affidavit on a page  
entitled, “LOCATION TO BE SEARCHED”.

Despite being an attorney, your affiant does not believe, nor has he found any evidence to the  
contrary, that the LA Metro OIG shares an attorney – client privilege, (as defined in California  
Evidence Code section 954) with her employer, LA Metro, or any of its employees. Her duties and  
job specifications as the LA Metro OIG, do not in any manner delineate that she is giving “legal  
advice or counsel” to her employer, LA Metro.

**To avoid the possibility of violating attorney-client privileges your affiant requests the court to  
assign a special master to accompany the Sheriff’s Department during the execution of this  
search warrant, for the purposes of protecting privileged materials, and assisting in the  
securing of evidence of suspected criminal activity.**

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1 The authority and responsibilities of the LA Metro OIG are specified in Los Angeles MTA  
2 Administrative Code Chapter 2-20. Specifically, section 2-20-020, section B: reads that the OIG is “to  
3 *receive and investigate complaints from any source and proactively conduct investigations*  
*concerning alleged abuse, fraud, or waste of MTA resources”.*

4 Section F reads that the OIG is to “*keep the Board of Directors and MTA management informed of*  
5 *issues and deficiencies relating to compliance with applicable policies, procedures, federal and state*  
6 *laws, regulations and grants, and the need for and the status of, any appropriate corrective action”.*

7 Section H reads that the OIG is to “*coordinate as necessary on criminal matters with law enforcement*  
8 *agencies”.*

9 Chapter 2-20-040 of the MTA Administrative Code reads as follows, “*Confidentiality of Inspector*  
10 *General Investigatory Files. All information compiled by the Inspector General as part of an*  
11 *investigation is confidential and shall be considered an investigatory file under Government Code*  
12 *6254 (f) and shall be subject to release only as set forth therein.”*

13 Your affiant believes that this section (California Government Code 6254 (f)) **does not preclude** the  
14 seizure, pursuant to this warrant, of the records herein enumerated and sought.

15 The evidence sought and requested in this affidavit by your affiant will possibly assist in  
16 corroborating the elements needed to prove the following criminal allegations lodged against (Los  
17 Angeles County Board of Supervisor) Sheila James Kuehl, and (Peace Over Violence Executive  
18 Director) Patricia Ochiuzzo Giggans.

19 Based on the facts documented above, your affiant authored a five-location search warrant, with the  
20 hope of acquiring document evidence that may assist in this investigation.

21 On February 17<sup>th</sup>, 2021, this search warrant was signed by Judge Ronald S. Coen of the Clara  
22 Shortridge Foltz Criminal Justice Center, Los Angeles Superior Court.

23 No items were seized at the time of service. Included within the provided copies of the search  
24 warrant were instructions that the recipient of the warrant must provide (your affiant) Detective Max  
25 Fernandez copies of the requested documents sought, within 5 business days.

26 Due to the existence of an overriding interest that overcomes the right of public access to the  
affidavit, your affiant requested that portions of this search warrant were to be sealed pursuant to  
California rules of court 8.46, and 2.2550. A sealing order was approved and signed by the Judge  
Ronald S. Coen.

February 17, 2021, warrant location # 1- **Metropolitan Transportation Authority Headquarters,**  
- 1 Gateway Plaza, Los Angeles, Ca.

On February 18<sup>th</sup>, 2021, Detective Ruben Ladesma, Sergeant Rafael Rufino, and Lieutenant Andrew  
Meyer responded to the MTA Headquarters and provided Maggie Lancome (Legal representative at  
MTA) with a copy of the search warrant.

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1  
2 February 17, 2021, warrant locations #2, 3, and 4 – **Peace over Violence**

- 3 - 1541 Wilshire Boulevard, Suite 300. Los Angeles, CA 90017  
4 - 1015 Wilshire Boulevard, Suite 200. Los Angeles, CA 90017  
5 - 892 N Fair Oaks Ave. Unit D, Pasadena, CA. 91103

6 On February 18<sup>th</sup>, 2021, Detectives Candice Bivins, Don Chavez, and Brian Judge, responded to the Peace Over Violence Metro Office (1541 Wilshire Blvd. Los Angeles) and contacted Yvette Lozano, who was served with a copy of the search warrant.

7 February 17, 2021, warrant location #5 – **Office of the Inspector General (OIG) of the Los Angeles County Metropolitan Transit Authority**

- 8 - 818 West 7<sup>th</sup> Street, 5<sup>th</sup> floor, Los Angeles, 90017

9 On February 24<sup>th</sup>, 2021, your affiant responded to the Office of Inspector General's downtown Los Angeles office, where he contacted Chief Administration Analyst Thomas Puchalski. Mr. Puchalski received a copy of the search warrant, along with a sealing order, signed by Judge Ronald S. Coen.

10 On February 25<sup>th</sup>, 2021, Attorney Austin Dove (an attorney retained by Patricia Giggans) met with your affiant and delivered a cardboard box containing several copies of printed contracts between Peace Over Violence and several different Los Angeles County entities. Also included were several emails from Patti Giggans and Yvette Lozano's (Chief Program and Operations Officer) accounts.

11 While reviewing the emails provided, it was obvious that numerous emails were missing, due to the large gaps in dates. None of the call logs, nor audits requested were provided.

12 On April 5<sup>th</sup>, 2021, Attorney Robert Dugdale representing MTA, and Attorney Harv Anand representing the LA Metro Office of Inspector General, filed a motion to quash, traverse, and unseal the original search warrant (Case No. BH013505).

13 On June 21<sup>st</sup>, 2022, Judge Eleanor Hunter denied the motions.

14 To this date both MTA and LA Metro Office of Inspector General have not surrendered the articles requested and remain noncompliant to the signed search warrant.

15 The Sheriff's Department has given both entities ample time to comply. Also, with a quickly approaching statute of limitations, your affiant requests the court authorize the Los Angeles County Sheriff's Department and or their representatives to physically search the indicated locations for any computer hardware or the other items articulated in this warrant that may contain the items needed to complete this investigation.

16 Your affiant is also requesting the authorization to conduct a forensic search of the contents of any recovered computer hardware.

17 Board of Supervisor member Sheila Kuehl occupies an office on the 8<sup>th</sup> floor of the Kenneth Hahn Hall of Administration building.



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1  
2 Your Affiant has spent hours upon hours listening to MTA Board meeting agendas and was unable to  
3 locate any record of a single vote conducted by the Board of Directors approving the \$160,000 no bid  
4 purchase in 2016, the \$160,000 renewal of the no-bid purchase order signed in 2018, nor the approval  
5 for a \$494,000 contract signed in 2019.

6 Your Affiant believes that a search of the Sheila Kuehl's office for the items articulated in this  
7 affidavit, may provide answers to when, how, and where these contracts and purchases were  
8 conceived and decided upon.

9 You Affiant request the court authorize the Los Angeles County Sheriff's Department and their  
10 representatives to search the office for the items articulated in this affidavit.

11 On August 19<sup>th</sup> 2022, your Affiant spoke with a security guard assigned to the 8<sup>th</sup> floor of the Kenneth  
12 Hahn Hall of Administration. This guard stated that because of the Covid-19 pandemic, Sheila Kuehl  
13 has not been to her office in over a year. Your Affiant noted and photographed a sign affixed to the  
14 door of Sheila Kuehl's office that reads: *"Thank your for visiting, but our offices are closed. Please  
15 call (213) 974-3333 to speak with a staff member and stay up to date on Covid-19."*



17 The regular meetings of the Board of Supervisors are held every Tuesday at 9:30 a.m. in the Board's  
18 Hearing Room located at 500 West Temple Street, Room 381B, Kenneth Hahn Hall of  
19 Administration in Los Angeles. For the last two years the Board has been working remotely from  
20 home. Meetings are now held virtually via the internet.

21 Due to the above, your affiant requests the court authorize the Los Angeles County Sheriff's  
22 Department and or their representatives search the home of Sheila Kuehl for all the items articulated  
23 in this affidavit, including computer hardware, cell phone(s), and any other electronic media used for  
24 county business. Your affiant is also requesting the authorization to conduct a forensic search of the  
25 contents of any recovered computer hardware.

26 The Los Angeles County Civilian Oversight Commission also has been meeting virtually, while  
working from home. According to the Peace Over Violence website, all employees have been  
working from home.

While examining the emails provided by Peace Over Violence, many of the emails discussing the  
POV/MTA contracts, that are authored by Patricia Giggans state they were sent via iPhone.

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1  
2 Due to the above, your affiant requests the court authorize the Los Angeles County Sheriff's  
3 Department and or their representatives search the home of Patricia Giggans for all computer  
4 hardware, cell phones, or other electronic media as previously articulated. Your affiant is also  
5 requesting the authorization to conduct a forensic search of the contents of any recovered computer  
6 hardware.

**Digital Forensic Examination**

7 Based on training, and experience, your affiant knows that digital files or remnants of such files can  
8 be recovered months or even years after they have been downloaded onto a hard drive or other  
9 storage device, deleted or viewed via the Internet. Digital files downloaded to a storage device can  
10 be stored for years and remains on the storage device until it is overwritten by new data. Therefore,  
11 deleted files, or remnants of deleted files, may reside in free space or slack space-that is, in space on  
12 the storage device that is not currently being used by an active file-for long periods of time before  
13 they are overwritten. In addition, device's operating system may also keep a record of deleted data in  
14 a "swap" or "recovery" file.

15 Based upon knowledge, training and experience, your affiant knows that searching for information  
16 stored in cellular devices often requires that the device be accessed and searched using specialized  
17 programs or tools by a qualified expert in a controlled environment. This is often necessary to ensure  
18 the accuracy and completeness of such data, and to prevent the loss of the data either from accidental  
19 or intentional destruction. Data search processes are designed to recover even "hidden," erased,  
20 compressed, password protected, or encrypted files.

21 Because digital evidence is vulnerable to inadvertent or intentional modification or destruction (both  
22 from external sources or from destructive code imbedded in the system as a "booby trap"), a  
23 controlled environment may be necessary to complete an accurate analysis. In light of these  
24 concerns, your affiant requests the Court's permission to conduct an off-site search of the hardware  
25 for the evidence described and to employ the use of outside experts who will use whatever data  
26 analysis techniques appear necessary to locate and retrieve the evidence described in this warrant  
including EXHIBIT A.

As required by Penal Code§ 1546.1 (d); those items that are within the scope of this warrant will be  
copied and retained by investigative agents. Investigating agents will then seal any information from  
the device that is unrelated to the objective of the warrant (does not fall within the scope of EXHIBIT  
A and will not further review the information absent an order from the Court. If no evidence of  
criminal activity is discovered relating to the seized property and associated peripherals, the device  
will be returned promptly.

Your affiant request that a Search Warrant be issued based upon the facts, for the search including  
EXHIBIT A. Good cause being shown thereof, and the same be brought before this Magistrate or  
retained subject to the order of the court, or any court in which the offense in respect to which the  
property of things taken, triable, pursuant to Section 1536 of the California Penal Code.

**10 day search warrant return requirement.**

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1  
2 Electronic records are commonly accessed and archived electronically on computer systems. Due to  
3 the complexity of these computer systems, it normally takes more than ten days for telephone service  
4 provider employees to fully respond to search warrants for records. Your affiant requests the 10 day  
search warrant return requirement be waived in this case.

5 All material recovered as a result of this search warrant will be securely held by your affiant and  
promptly reported to the court.

6 Your affiant believes that the below listed crimes enumerated in this affidavit may have been  
7 committed by the parties identified thus far:

8 **Bribery of a County Supervisor 165PC:**

9 Every person who gives or offers a bribe to any member of any common council, board of  
10 supervisors, or board of trustees of any county, city and county, city, or public corporation...and  
11 every member of any of the bodies mentioned in this section who receives or offers or agrees to  
receive any bribe...is punishable by imprisonment in the state prison.

12 **Bribery of a Public Officer 67PC:**

13 Every person who gives or offers any bribe to any executive officer in this state, with intent to  
14 influence him in respect to any act, decision, vote, opinion, or other proceeding as such officer, is  
punishable by imprisonment in the state prison.

15 **Fraudulent Claim to a County Officer 72PC:**

16 Every person who, with intent to defraud, presents for allowance or for payment to any state board or  
17 officer, or to any county, city, or district board or officer, authorized to allow or pay the same if  
18 genuine, any false or fraudulent claim, bill, account, voucher, or writing, is punishable either by  
imprisonment in the county jail.

19 **Bribing a County Legislator to Influence a Vote/Decision 86PC:**

20 Every Member of either house of the Legislature, or any member of the legislative body of a city,  
21 county, city and county, school district, or other special district, who asks, receives, or agrees to  
22 receive, any bribe, upon any understanding that his or her official vote, opinion, judgment, or action  
23 shall be influenced thereby, or shall give, in any particular manner, or upon any particular side of any  
24 question or matter upon which he or she may be required to act in his or her official capacity, or  
25 gives, or offers or promises to give, any official vote in consideration that another Member of the  
Legislature, or another member of the legislative body of a city, county, city and county, school  
26 district, or other special district shall give this vote either upon the same or another question, is  
punishable by imprisonment in the state prison.

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1 **Conspiracy to Request or Take a Bribe 182/86 PC:**

2 (a) If two or more persons conspire:

3 (1) To commit any crime.

4 (2) Falsely and maliciously to indict another for any crime, or to procure another to be charged or  
5 arrested for any crime.

6 (3) Falsely to move or maintain any suit, action, or proceeding.

7 (4) To cheat and defraud any person of any property, by any means which are in themselves criminal,  
8 or to obtain money or property by false pretenses or by false promises with fraudulent intent not to  
9 perform those promises.

10 (5) To commit any act injurious to the public health, to public morals, or to pervert or obstruct justice,  
11 or the due administration of the laws.

12 (6) To commit any crime against the person of the President or Vice President of the United States,  
13 the Governor of any state or territory, any United States justice or judge, or the secretary of any of the  
14 executive departments of the United States.

15 **Compounding a Crime 153PC:**

16 Every person who, having knowledge of the actual commission of a crime, takes money or property  
17 of another, or any gratuity or reward, or any engagement, or promise thereof, upon any agreement or  
18 understanding to compound or conceal that crime, or to abstain from any prosecution thereof, or to  
19 withhold any evidence thereof, except in the cases provided for by law, in which crimes may be  
20 compromised by leave of court, is punishable by imprisonment in a county jail.

21 **Theft or Bribery Concerning Programs Receiving Federal Funds, Title 18, US Code, 1341, 1346**

22 Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining  
23 money or property by means of false or fraudulent pretenses, representations, or promises, or to sell,  
24 dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use  
25 any counterfeit or spurious coin, obligation, security, or other article, or anything represented to be or  
26 intimated or held out to be such counterfeit or spurious article, for the purpose of executing such  
scheme or artifice or attempting so to do, places in any post office or authorized depository for mail  
matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or  
causes to be deposited any matter or thing whatever to be sent or delivered by any private or  
commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly  
causes to be delivered by mail or such carrier according to the direction thereon, or at the place at  
which it is directed to be delivered by the person to whom it is addressed, any such matter or thing,  
shall be fined under this title or imprisoned not more than 20 years, or both. If the violation occurs in  
relation to, or involving any benefit authorized, transported, transmitted, transferred, disbursed, or



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1 paid in connection with, a presidentially declared major disaster or emergency (as those terms are  
2 defined in section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42  
3 U.S.C. 5122)), or affects a financial institution, such person shall be fined not more than \$1,000,000  
or imprisoned not more than 30 years, or both.

4 For the purposes of this chapter, the term "scheme or artifice to defraud" includes a scheme or artifice  
5 to deprive another of the intangible right of honest services.

6 **Theft of Public Funds, Title 18, US Code, 461:**

7 Whoever embezzles, steals, purloins, or knowingly converts to his use or the use of another, or  
8 without authority, sells, conveys or disposes of any record, voucher, money, or thing of value of the  
9 United States or of any department or agency thereof, or any property made or being made under  
contract for the United States or any department or agency thereof; or

10 Whoever receives, conceals, or retains the same with intent to convert it to his use or gain, knowing it  
to have been embezzled, stolen, purloined, or converted—

11 Shall be fined under this title or imprisoned not more than ten years, or both; but if the value of such  
12 property in the aggregate, combining amounts from all the counts for which the defendant is  
13 convicted in a single case, does not exceed the sum of \$1,000, he shall be fined under this title or  
imprisoned not more than one year, or both.

14 \*\*\*

15 Your affiant is NOT requesting that "NIGHT-TIME" service be granted for the service of this search  
warrant; however, he wants to advise the court that:

16 Your affiant believes that the examination and seizure of the evidence may take longer than usual,  
17 extending into the restrictive hours legislated under Penal Code section 1533, (7:00 AM to 10:00  
18 PM).

19 It is your affiant's intent to serve this warrant with as minimal an intrusion on the businesses and  
20 personal affairs of the parties as possible. Your affiant intends to serve this warrant with assistance  
from Special Agents from the Federal Bureau of Investigation (FBI).

21 It is your affiant's intent to seek the co-operation of Kuehl, Giggans, and the other parties in  
22 requesting immediate access to the devices articulated in this affidavit to be seized.

23 Your affiant will ask the parties for the passcodes, access codes, or biometric (face or thumbprint)  
24 authorization to access the devices, specifically cell phones, at the time and place of this warrants  
service.

25 If possible, at the time of the service of this warrant, your affiant intends to have specially trained and  
26 equipped technically proficient law enforcement agents from the Los Angeles Sheriff's Department,  
and/or the FBI, present at the locations, who can access the material on the devices and download that  
material to electronic media for later examination.

STATE OF CALIFORNIA - COUNTY OF LOS ANGELES  
**SEARCH WARRANT AND AFFIDAVIT**

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2 If successful in this endeavor, your affiant, with the court's permission, will leave the devices with the  
3 parties to whom they belong after obtaining the materials sought in this warrant.

4 If that co-operation is gained, the seizure of the devices will be for a potential minimal amount of  
5 time, dependent upon the co-operation of the parties involved, and the technical difficulties  
6 encountered in copying / mirroring the materials

7 It is your affiant's intention, if the parties will not co-operate with this request, to seize the devices  
8 and have them examined at a later time, off-site, as previously articulated.

9 Your affiant may seek the assistance of the FBI in the examination of the devices for this purpose.

10 If possible, your affiant is going to ask the witness previously identified in this affidavit, to  
11 accompany Los Angeles Sheriff's detectives and/or FBI agents to the Metro Headquarters location  
12 articulated in this affidavit.

13 The witness had previously indicated to your affiant that she could specifically identify the exact  
14 desktop computers that contain the evidence sought by your affiant.

15 By having the witness do so at the time of the service of this warrant, your affiant feels that the  
16 intrusion on the business affairs of the MTA, will be mitigated, as well as the search can be narrowed  
17 in scope and minimally intrusive on the operations of the entity.

18 Your affiant prays this search warrant be granted to assist in determining if the above-described  
19 crimes have been committed, and if so, by whom.  
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