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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SAMUEL A. PERRONI,)
)
) PLAINIFF,)
) VS.) CASE NO.
) 21STCP00108
)
) ALEX VILLANUEVA,)
)
) DEFENDANT.)
 _____)

ZOOM DEPOSITION OF LOUIS DANOFF

VOLUME 1

FRIDAY, MARCH 26, 2021

2:03 p.m.

MONTEBELLO, CALIFORNIA

REPORTED BY:
KAREN VILICICH,
CSR NO. 7634
JOB NO. 162330

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I N D E X

WITNESS: LOUIS DANOFF

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1 LOS ANGELES, CALIFORNIA;

2 FRIDAY, MARCH 26, 2021, 2:03 p.m.

3

4 THE STENOGRAPHIC REPORTER: Do you solemnly swear
5 that the testimony you may give in the following
6 deposition shall be the truth, the whole truth, and
7 nothing but the truth, so help you God?

8 THE WITNESS: Yes.

9 MS. BIRENBAUM: Mr. Cate, before we get started, I
10 would just like to make an objection on the record and
11 let you move forward. We are going to object to the
12 recording of this Zoom transcript. We are not going to
13 stop the deposition and are going to let you proceed, but
14 we do object to it. We object to any efforts to use it
15 in court as it does not meet the requirements for
16 admissibility under the evidence code and the
17 requirements for a certified videographer.

18 MR. CATE: We understand the objection and if it
19 does turn out that that is what the state of the rules
20 are in California, we won't do anything to try to play
21 this at a court proceeding.

22

23 LOUIS DANOFF,
24 having been previously remotely duly sworn, was examined
25 and testified as follows:

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EXAMINATION

BY MR. CATE:

Q I will now start, go into the deposition itself.

Mr. Danoff, my name is Brandon Cate. I am an attorney with the Arkansas law firm of Quattlebaum, Grooms & Tull. My partner, Vince Chadick, is on the Zoom as well. Our firm is proud to represent Sam Perroni, the plaintiff in this lawsuit, that we have filed against the Los Angeles County Sheriff's Department. Mr. Perroni, you cannot see him, but he is observing the Zoom in a different room here at our law firm.

Mr. Perroni, has filed a lawsuit under the California Public Records Act and this is a deposition in that lawsuit in which I will ask you questions under oath. You must answer the questions unless your attorney instructs you not to answer a particular question.

Although no judge is present, this is a formal legal proceeding, just like testifying in court.

We have a court reporter here, Karen Vilicich, taking down everything that is said during this deposition, just as if we were in a courtroom. And as we just noted, we are also making a Zoom recording of this for our own records.

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1 So let's get started. Would you state your
2 name for the record, please.

3 A Louis Danoff. D-a-n-o-f-f.

4 Q Do you still reside at 301 Avenida De La
5 Merced in Montebello, California?

6 A Yes.

7 Q Do you reside anywhere else?

8 A No.

9 Q Have you ever testified in a deposition?

10 A No.

11 Q Let me give you some rules or ground rules
12 that will help this go more smoothly. Because we have a
13 court reporter here taking down everything that we say,
14 that is said in this Zoom, it's important that we not
15 talk over one another. If you give me a chance to finish
16 my questions, I will do my best to give you an
17 opportunity to finish your answers.

18 A Okay.

19 Q "Uh-huhs" and "huh-huhs" don't take very
20 well on paper. So if you say "uh-huh," I may ask you a
21 follow-up, "Is that a yes or a no?"

22 A That's a yes.

23 Q If you don't understand a question, please
24 let me know that. I'm happy to rephrase or repeat the
25 question, whatever the case may be.

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1 Is that all agreeable?

2 A Yes.

3 Q Are you taking any medication or anything
4 else that would inhibit your ability to recall events?

5 A No.

6 Q Are you taking any medication or anything
7 else that would inhibit your ability to answer
8 truthfully?

9 A No.

10 Q Do you have any medical condition that would
11 inhibit your ability to recall events?

12 A No.

13 Q And do you have any medical condition that
14 would inhibit your ability to answer truthfully?

15 A No.

16 Q If you need to take a break for any reason,
17 let me know. This is not an endurance contest. The only
18 thing I ask is if there is a question on the table, I
19 would ask you to answer that before we go into a break.

20 A Okay.

21 Q And one last thing, I will tell you a brief
22 anecdote, I was in a trial recently and an individual
23 that I had deposed for a number of hours showed up at
24 trial and said he didn't understand anything I had asked
25 him in the deposition because English is not his first

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1 language. And this was a farmer, he lived his entire
2 life in Arkansas.

3 So I asked him, what is his first language.
4 He said it is Pennsylvania Dutch.

5 So because of that experience, I now have
6 added a question to my deposition grounds rules: Is
7 English your first language?

8 A Yes.

9 Q Is English the language spoken in your home?

10 A Yes.

11 Q Thank you for that.

12 You gave a sworn declaration last summer in
13 a prior lawsuit Mr. Perroni filed. As you may recall
14 from giving that declaration, our side considers you a
15 witness because of the book author named Suzanne Finstad
16 identified you in a book as being a person who gave her
17 and her mother access to the quote, unquote murder book
18 concerning the sheriff's department investigation into
19 the death of actress Natalie Wood. We will get into the
20 details of the murder book in a little bit, but when I
21 use the term "murder book," do you have an understanding
22 of what I am talking about?

23 A Yes.

24 Q What is that understanding of what a murder
25 book is at the Los Angeles County Sheriff's Department?

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1 A A murder book is a collection of the
2 investigation reports, photographs, autopsy reports,
3 supplemental attachments that enhance your presentation.
4 Basically it's a collection of materials that you would
5 use if you were going to go forward with a prosecution.

6 Q Thank you for that.

7 A It is basically a grouping of -- this is a
8 grouping of materials that you are using to basically
9 identify the case. There might be more papers, there
10 might be more items, but that would not be a part of your
11 murder book. That would be on your -- that would be in
12 your poor boy or your case file, which would be open to
13 discovery.

14 Q I think I read somewhere that a poor boy is
15 what you all call the manila folders?

16 A The poor boy, yes, it's a brown manila
17 folder, accordion-type, that opens up. They got the long
18 size or the short size, whatever they have on hand that
19 you grab to put your initial case materials in. So when
20 you start a case, you grab a poor boy and you put the
21 file number on it and your victim's name and all the
22 important information on the front. And then you start
23 moving that around when you work your case, that's where
24 you put all your papers. Basically you are collecting
25 your papers from that poor boy that you are eventually

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1 going to put into -- or copies of which you are going to
2 put into your murder book.

3 Q Thank you.

4 We will get into some more details about the
5 murder book in a moment.

6 I first want to mention, Natalie Wood's
7 married name was Natalie Wagner. Would you agree that
8 any of my questions that reference Ms. Wood is also a
9 reference to the person Natalie Wagner?

10 A Yes.

11 Q Ms. Wood died in 1981 so some of my
12 questions will ask you about how things were done at the
13 sheriff's department in 1981. Ms. Finstad wrote in her
14 book that she met with you in November of -- in November,
15 but doesn't indicate the year. It doesn't expressly
16 state the year. We are surmising that she was making a
17 reference to November 2000, could have been November,
18 1999. In any event, some of my questions relate to how
19 things were done at the sheriff's department around the
20 year 1999 or 2000. So I just wanted to alert you to that
21 before we get very far into this.

22 A Okay.

23 Q With that background in place, let me ask
24 you some questions about what you did, if anything, to
25 prepare for today's deposition.

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1 First of all, did you do anything to prepare
2 for this deposition?

3 A I reread what my -- reread the document that
4 I read for the first court appearance for this case.

5 Q Okay. And I know you --

6 A I am reaching up to -- it's -- I forgot the
7 name -- I forgot the word to use, but I made a
8 declaration. That's what it was, I reviewed my
9 declaration.

10 I'm sorry, I don't speak as clearly -- I
11 don't catch the big words like I did before when I was
12 younger.

13 Q You are doing great.

14 A So sometimes -- so there is going to be a
15 lot of handshaking here.

16 Q You are doing great. Take all the time you
17 need to answer however you want to answer.

18 A Okay.

19 Q Beyond reading your prior declaration, did
20 you do anything else to prepare for the deposition?

21 A There was a -- I do have a copy of an e-mail
22 that I had sent to Mr. Perroni in response to his e-mail
23 to -- original e-mail to me in which he had sent some
24 questions and I basically tried to answer them.

25 Q And I have a copy of that as well. We will

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1 talk about that here in a moment.

2 Besides the declaration and a copy of that
3 e-mail, did you do anything else to prepare for today's
4 deposition?

5 A I contacted the homicide bureau to advise
6 them that I had received a subpoena and they put me in
7 touch with County Counsel. And County Counsel, you know,
8 Anna, basically responded as my representative for County
9 Counsel.

10 Q And I know you are represented by counsel,
11 and I don't want to hear anything about communications
12 between you and your counsel. Okay?

13 A Yes.

14 Q Other than your counsel, did you talk to
15 anyone else in preparation for this deposition?

16 A No.

17 Q You made a reference to homicide bureau and
18 I assume that's a reference to the homicide bureau at the
19 sheriff's department?

20 A Yes.

21 Q Did you gather any documents, other than the
22 ones we've already discussed, to prepare for today's
23 deposition?

24 A No.

25 Q Do you keep a file at home regarding

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1 Ms. Wood's death investigation?

2 A I don't have any file of any of that
3 investigation. I have never seen that file.

4 Q Let's talk a little bit about your
5 employment background. I hear you have had a very
6 celebrated career. I want to say you worked for the
7 sheriff's department for almost 35 years?

8 A Yes.

9 Q And I read somewhere that you worked there
10 from 1966 until 2001; is that correct?

11 A As an active deputy, yes.

12 Q Is it true you were an active homicide
13 investigator for about 23 years; is that right?

14 A Yes.

15 Q Among other things, you worked on a gang
16 homicide team for a number of years; correct?

17 A Yes.

18 Q And then after you retired in 2001, you
19 continued in a reserve capacity for about six years; is
20 that correct?

21 A Yes. Yes.

22 Q And then you came back a second time in 2009
23 and worked as some sort of civilian reserve; is that
24 correct?

25 A No, I was not on the reserve when I came

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1 back in 2009, I was a civilian, but I came back to handle
2 a case as the active in-court investigating officer on
3 a -- I guess it was a -- on a Vietnamese case that I got
4 and I worked on when I was working Unsolved.

5 Q What was your position in 1981? Were you a
6 homicide investigator at that time?

7 A Yes.

8 Q What about the year 1999 or 2000, what was
9 your position around those years?

10 A I was working the unsolved team.

11 Q I didn't understand that. I'm sorry.

12 A In the last years that you mentioned, I was
13 working on the unsolved team. It was -- there was about
14 five of us, four or five of us that were assigned to the
15 unsolved team. And I was one of them.

16 Q Okay.

17 A These are all guys that had been around for
18 a long time.

19 Q Okay. At some point, I think you were an
20 instructor at the California Department of Justice's
21 Homicide School; is that true?

22 A Yes.

23 Q Do you remember what years that would have
24 been?

25 A I did that -- I cannot remember -- I don't

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1 remember the year, but I was already working the unsolved
2 team when they did it. L.A.P.D. and L.A.S.D. homicides
3 joined together to put together this presentation for the
4 Department of Justice and I participated in that. I did
5 it for a couple of years into my retirement and then I
6 said I had enough.

7 Q And you may have to help me with this next
8 question, but you worked as -- is the term "librarian" at
9 the sheriff's department?

10 A Yes.

11 Q About when were you the librarian?

12 A I believe in -- I can't remember the dates,
13 but it's in my declaration. But I was working on the
14 gang team, we had a gang team that formed up for 10
15 years, I was one of the OGs, one of the original
16 investigators. In fact, I was the only
17 non-Spanish-speaking investigator from homicide that
18 volunteered for this.

19 They took two of us, me and my partner, Bill
20 McComas, and we basically set up a library system in
21 which we basically built the shelves and came up with a
22 system of recording the cases and basically had three
23 rooms at the old Hall of Justice on the ninth floor, in
24 which we put our library.

25 The reason why we did this is prior to that,

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1 there was no system. The investigators all kept their
2 own files. The only thing that was on file in the bureau
3 was the case memo. There might be a -- there might be a
4 copy of the -- each individual report in the secretarial
5 file and there was a copy of the murder book, if one was
6 done, that was kept. And it was filed either as an
7 unsolved case or as a solved case. That was the only --
8 if you picked up this thing prior to the library and you
9 did not know the investigators, you would have a tough
10 time putting everything together.

11 So with the -- with us putting this library
12 into -- getting it going and then having the guys trust
13 us, we started getting all the cases brought in. We
14 categorized them in an ABC-type, three-by-five card
15 system.

16 Q How many of there were you all working as
17 librarians?

18 A Well, when McComas and I first started out,
19 there were both of us, then we had some help and some
20 outside help setting up the shelves and all that stuff,
21 but we arranged all that stuff. Normally then it came
22 down to me, and then after a short time when it was in
23 place, McComas and I went back to our original unit, we
24 were assigned to the gang team, and we went back to the
25 gang team. And two other investigators, Gunther and

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1 Munoz, two old-timers, they took over the job and one or
2 the other of them maintained the library. And I
3 basically didn't have any contact with the library other
4 than to turn my poor boys in.

5 Q I did not catch those last two names. Could
6 you repeat those names?

7 A Yes, it's Gunther and Munoz, M-u-n-o-z.

8 Once again, those two names are not
9 mentioned in my discovery, G-u-n-t-h-e-r. Gunther.

10 Q So if somebody wanted to check out a murder
11 book from the library, it would be one of those two guys?

12 A No. No. If somebody wanted to check out a
13 library book, let's say an investigator needs it, for
14 whatever reason, the office needs it, they would fill out
15 a 8-by-11 card. They would put down the library number,
16 which they got from our index. They would put down the
17 name and the date. They would hand it in -- in Gunther's
18 case or Munoz's case, they would give it to those guys,
19 they would have a pickup point that they would drop it
20 off. Those guys would go to the library, they will pull
21 that case, and put it on the requesting investigator's
22 desk.

23 The reverse process worked when they were
24 returning it. They would put it in the same place, the
25 pickup point, where we picked up their request, they

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1 would put the poor boy back there, and then it would be
2 refiled on the shelf. And when we refile it, that eight-
3 by-11 card that we had put in its place, will be taken
4 out of the space and the file would go back in.

5 So we had a way of tracing who had it. We
6 traced it basically by an empty file space. If it was
7 full it, it was there, if it wasn't full, there was a
8 card there.

9 Q So would you keep the same card so if
10 somebody else checked out the same file?

11 A You know what, whoever checked out that same
12 file, it wouldn't be the same, no. You picked up a
13 random three-by-five card, it was just a name, you put
14 your name on, whoever was ahead of you was crossed off.
15 It's the bottom names that I am looking at to pull the
16 file. So I did not keep track of how many people went in
17 to look at it, I just was concerned about which file you
18 wanted and my ability to track it down, if I had to.

19 Q This would have been true of the 1999-2000
20 time frame?

21 A Yes. And --

22 Q I am sorry, I did not catch that.

23 A I said yes. Because there was -- your
24 question you asked me about when I was librarian, I told
25 you I was the librarian at the very beginning, then I

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1 went back to the team in -- I cannot remember the date
2 that I went to the unsolved team. But anyways, McComas
3 eventually matriculated to the unsolved team. And he,
4 when he went to the unsolved team, he became the
5 librarian. Shortly thereafter, I went over to the
6 unsolved team when Bill retired. I became the librarian
7 again. So I took over from whenever I went to the
8 unsolved team, you know, to my retirement, or just before
9 my retirement as being the -- the librarian.

10 So I picked it up -- I was the originator.
11 Then I picked it up later in my career when I was on the
12 unsolved team. I took it back.

13 Q Thank you for that explanation.

14 I think you retired in March of 2001?

15 A Yes.

16 Q So you would have been the librarian up
17 until about March 2001?

18 A Yes. There is one other point I will add on
19 that is that towards the end of my -- you know, just
20 prior to my -- Lynn Reader was assigned to be librarian
21 to replace me. And there was an overlap period that Lynn
22 was also a librarian, but basically, I was conducting
23 most of the librarian functions. And Lynn's job, which
24 once again is in my write-up, Lynn's job was to convert
25 the library system -- let me back up.

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1 Homicide -- our record-keeping had evolved
2 tremendously over the 20 years. And we now had a
3 computer system and a lot of -- everything was more
4 computerized. My ABC system, which lasted for 20 years,
5 was -- we were running out of space and it was time for a
6 change. Lynn basically went into the new system,
7 assigned each case a new number, and basically made the
8 conversion to new numbers for the system that I had
9 established, which was terrific for us going into the
10 future.

11 Q Got you.

12 And is Lynn a -- is Lynn Reader, is that a
13 male or a female?

14 A He's a male.

15 Q Did you ever work on the investigation
16 itself into the death of Ms. Wood?

17 A No.

18 Q Do you recall ever handling any paperwork
19 regarding the death of Ms. Wood?

20 MS. BIRENBAUM: Vague and ambiguous.

21 You can answer still.

22 THE WITNESS: I can answer?

23 MS. BIRENBAUM: You can answer. I am just making
24 an objection for the record.

25 THE WITNESS: No.

1 I will give you this, the only thing that I
2 might have done is I might have put that case on the file
3 and filed it in the library. But I really have -- I
4 never looked at it. I have no knowledge of doing that,
5 but it's a possibility that I could have. I never saw
6 any paperwork or anything. I never saw that file.

7 BY MR. CATE:

8 Q And I know I am asking about events that
9 happened a long time ago and I am just asking to the best
10 of your recollection.

11 I take it that the investigation into
12 Ms. Wood's death would have garnered some attention in
13 the sheriff's department as the death of any celebrity
14 probably would have. Did you observe that to be true?

15 MS. BIRENBAUM: It calls for speculation, but you
16 can answer.

17 THE WITNESS: You mean if this is something that
18 became talk within the bureau that we talked about?

19 BY MR. CATE:

20 Q Yes.

21 A That we inquired about?

22 Q Yes.

23 A At the beginning, everybody knew --
24 everybody knew who the -- who it was, what it was, and
25 the basic facts about the case, but -- so we -- we talked

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1 about it, but I never talked about it with any of the
2 investigators. I have never read any of the reports. I
3 never pursued looking at any of the papers. I never saw
4 the file.

5 Q Do you have a copy of your e-mail exchange
6 with Mr. Perroni handy?

7 A Yes, I do.

8 Q It's an e-mail exchange from April of 2020
9 and let's mark this as Exhibit 1 for the record.

10 First of all, the e-mail address on here, is
11 your e-mail address, "ldanoff@charter.net"?

12 A Yes.

13 Q Would that have been your e-mail address in
14 April of 2020?

15 A Yes.

16 Q Do these two pages reflect an e-mail
17 exchange that you had with Mr. Perroni?

18 A Yes.

19 Q Let's talk through some of what you wrote
20 here. First of all, your e-mail refers to the L.A.S.D.,
21 I assume that's a reference to the Los Angeles County
22 Sheriff's Department?

23 A Yes.

24 Q All right. Towards the bottom of page 1,
25 I'm looking at the paragraph that starts with "L.A.S.D.

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1 Homicide Bureau."

2 Do you see that?

3 A Yes.

4 Q Then you wrote, "L.A.S.D. Homicide Bureau
5 handles all death investigations, murder, suicides,
6 suspicious circumstances, workplace, and accidental
7 deaths."

8 Is that a truthful statement as far as you
9 know?

10 A Yes.

11 Q Would that have been true in 1981?

12 A Yes.

13 Q Is your knowledge in making that statement
14 based on your time working for the sheriff's department?

15 A Yes.

16 Q The next paragraph you wrote, "Every murder
17 case is supposed to be booked with reports that detail
18 the investigation to the point where the investigation is
19 handled to conclusion or to the last point wherein it was
20 actively investigated."

21 Is that a truthful statement as far as you
22 know?

23 A That's a truthful statement, but there is a
24 reality point to that also. Not every murder -- not
25 every murder is booked because that's just human error

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1 and time. But if it's going to be presented, if that
2 case is going to be presented, we do -- there will be a
3 murder book.

4 Q That would have been true in 1981 as well?

5 A Yes.

6 Q Do you know if the investigation into
7 Ms. Wood's death had a murder book?

8 A I do not -- I do not know for sure. I do
9 not know personally, but I would assume that it does.

10 Q Later in that same paragraph, you wrote, "Of
11 course, over the years, due to a variety of reasons, not
12 every murder investigated has a murder book on file, but
13 all of the reports generated by a homicide investigator
14 is kept in a separate file maintained by the secretaries
15 in the bureau and every murder and officer-involved
16 call-out has a memo that is maintained by the
17 administrative sergeant of the bureau."

18 Is that also a truthful statement as far as
19 you know?

20 A Yes.

21 Q Would that have been true in 1981?

22 A Yes.

23 Q At the bottom of that first page, that last
24 paragraph, you wrote, "The murder book was originally
25 called a blue book due to the blue cover that is used to

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1 contain the information. In the late 70s, 80s, and 90s,
2 the L.A. County homicide rate exploded and we started to
3 call any investigation that was booked for presentation a
4 murder book out of convenience.

5 "Yes, you are right, there are a lot of
6 investigations that are not murders, but if we book it,
7 it is still called a murder book."

8 Is that a true statement as far as you know?

9 A Yes.

10 MS. BIRENBAUM: I am going to object. It is an
11 incomplete reading of the sentence.

12 MR. CATE: I will finish reading it.

13 Q The last sentence says, "Yes, you are right.
14 There are a lot of investigations that are not murders,
15 but if we book it, it is still called a murder book or
16 shooting book for officer-involved incidents, even if
17 they do not involve a gun."

18 Is that also a true statement as far as you
19 know?

20 A Yes.

21 Q Would all of that have been true in 1981?

22 A Yes.

23 Q On the next page, you list out what is
24 contained in a murder book. Do you see that at the first
25 full paragraph on the second page?

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1 A Yes.

2 Q Let's take that paragraph one item at a
3 time.

4 You first wrote, "A murder book consists of
5 reports by the handling investigators who detail the
6 steps taken in the investigation to support a filing of
7 the charge. The filing -- to support a filing of
8 charges."

9 Is that a true statement as far as you know?

10 A Yes.

11 Q Would that have been true in 1981?

12 A Yes.

13 Q You next list, "Attachments: All supporting
14 reports relating to the investigation, maps, drawings,
15 search warrants, transcripts, et cetera."

16 Is that a true statement as far as you know?

17 A Yes.

18 Q Would that have been true in 1981?

19 A Yes.

20 Q You next list, "Suspect Information:
21 Personal information, photo, criminal history, booking
22 slip, filing information, and arrest warrant if issued."

23 Is that a true statement as far as you know?

24 A Yes.

25 Q Would that have been true in 1981?

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1 A Yes.

2 Q You next list, "Victim Information:
3 Personal information, photo."

4 Is that a true statement as far as you know?

5 A Yes.

6 Q Would that have been true in 1981?

7 A Yes.

8 Q You next list, "Coroner's Report: The
9 packet of reports and drawings provided by the person
10 handling the autopsy."

11 A Yes.

12 Q That's a true statement as far as you know?

13 A Yes, it is, but it would also include the
14 original coroner's deputy that arrived at the scene that
15 transported the body if we have all of his information
16 also. You know, he's the guy that collects the
17 fingernail clippings, he sets up the photographs.

18 Yes, it's not -- it's not just the doctor,
19 you know, who conducts the autopsy, it starts with when
20 the coroner investigator arrives and does his
21 investigation. So the coroner's packet has everything
22 that the coroner's office did.

23 Q Got it. That all would have been true in
24 1981 as well?

25 A Yes.

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1 Q In your experience, in your experience, is
2 it typical that there would have been photographs taken
3 during the autopsy process?

4 A Yes.

5 Q And if there are photographs taken during
6 the autopsy process, would you expect those to be in the
7 murder book as well?

8 A Some investigators do and some investigators
9 don't, but it would be a part of the -- it would
10 definitely be a part of your manila folder, your poor
11 boy.

12 Q So those pictures would make it to the
13 sheriff's department in some fashion?

14 A They would definitely be a part of my file,
15 yes.

16 Q And that's -- would that have also been true
17 in 1981?

18 A Yes.

19 Q You last wrote in that paragraph, and again
20 I'm looking at Exhibit 1, second page, "There is a lot of
21 other information collected during an investigation that
22 is pertinent to the prosecution and discoverable by the
23 defense during a trial. These include, but are not
24 limited to the investigator notebooks, crime scene
25 photos, autopsy photos, subjects developed during the

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1 investigation but eliminated, clues called in and worked
2 to a negative conclusion, et cetera. These items are
3 housed in a manila folder, boxes, or file cabinets,
4 depending upon the scope of the investigation."

5 Is that a truthful statement you typed there
6 as far as you know?

7 A Yes.

8 Q Would that have been true in 1981?

9 A Yes.

10 Q Was there a format for how a murder book was
11 supposed to be organized on its insides?

12 A The format that I presented to you was my
13 personal format. The investigator or the secretary puts
14 it together the way they wanted it. But all my books
15 were put together pretty much the way I have it out there
16 and that's the way I would tag them or put tabs for each
17 section. That's my way.

18 But this information, all this information
19 that I'm talking about, that would be used to prosecute a
20 case, would be in that -- in that murder book.

21 Can I go back one deal with the question
22 that you said about crime scene photos which you covered
23 in my thing?

24 Crime scenes photos might be a part of your
25 murder book, but in most cases, they aren't. They are

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1 part of the poor boy, you know, your poor boy. And both
2 the defense and the prosecution have access to that and
3 will pick out the pictures whatever they want to present
4 as evidence.

5 Q But the base elements, I think you are
6 telling me this is how you organized your murder books,
7 but there could be some variety with different
8 investigators?

9 A Yes. For an example, one example, guy puts
10 together his reports and he has got his patrol reports
11 and he has got his first homicide reports, he has got his
12 lab receipts, he has got his lab reports, and then all of
13 a sudden, he writes -- more information comes in and he
14 has a report. The book has already been started, they
15 just throw that in the back.

16 With my system, all the reports are
17 together. So you just go to the report section and you
18 can read the whole thing without jumping through a whole
19 bunch of hoops to get someplace. You get the whole
20 story.

21 Q Got you.

22 So the things that you typed out in this
23 e-mail to Mr. Perroni, you would expect to see that in
24 any murder book, though the order could be different
25 depending on the investigator?

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1 A Yes. Hold on for one second.

2 MR. CATE: Let's go off the record.

3 (Exhibit 1 marked for identification.)

4 (Recess taken.)

5 MR. CATE: Back on the record.

6 Q Tell me about the -- where was the library
7 first located when you all set it up in the early 1980s?

8 A Early 1980s, we were located up in the Hall
9 of Justice in Downtown L.A., I think between Broadway and
10 Spring Street, Temple, and the freeway. And we were up
11 on the eighth floor. I think there was one room on the
12 ninth floor.

13 No, homicide bureau was on the eighth floor,
14 the library was on the ninth floor. There was one other
15 room that might have been on the 10th floor.

16 Q At some point, there was an earthquake and
17 the building was condemned and you all had to move the
18 library; right?

19 A Yes.

20 Q By the time we get to 1999 and 2000, where
21 was the library? It was in a gym or something?

22 A Okay. I was -- I had already taken the
23 library back and was running a library when that move
24 occurred. So I oversaw the move from the Hall of Justice
25 to the Eastern Avenue facility, which is now our academy,

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1 I think.

2 Anyways, there was the Eastern Avenue
3 facility that the original sheriff's department academy
4 was located at. I think it's back there now again. And
5 they have a jail there and over the years, we had --
6 there was a gym that was there. In the old days, the
7 gymnasium was used for recruit training classes. And
8 when we moved from the Hall of Justice, we moved into
9 that gymnasium, which is on the Eastern Avenue facility,
10 just south of where the jail facility is located.

11 There are other county businesses on the
12 hill there, but this particular one is sheriff. I think
13 sheriff automotive also has a facility up there. Fire
14 department has a facility up there. Their headquarters
15 is up there.

16 Q How much of the library -- how much space in
17 the gym did the library take up?

18 A It took up the southern half of the library.

19 Q Southern half of the gym?

20 A Southern half of the gymnasium. Actually,
21 the whole part of that gymnasium, if you cut the gym part
22 in half, the library took up half, and we also had the
23 southern half, the remaining southern half of that
24 building. So --

25 Q Go ahead.

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1 A You go ahead.

2 Q If someone wanted to come in and check out a
3 murder book, would they be allowed to leave the premises
4 with it?

5 A Only on very specific circumstances. Let me
6 put it this way: Let's say an investigator really needs
7 the murder book, like right now, it can't wait until
8 tomorrow. He drives up -- you know, the separation
9 between where Biscailuz Center is, the Eastern Avenue
10 facility, Biscailuz Center, and where the sheriff's
11 homicide is located in the City of Commerce is
12 approximately five year -- five miles. Five years.

13 So anyways, he would drive up, I will go in
14 there and get his file, hand it to him, and he could walk
15 out with it, because he has filled out the paperwork, I
16 am ready to go. I am just accommodating him.

17 If I wasn't available, because I do work
18 cases, if I wasn't available, they would either call
19 ahead and the property custodian would get it for him or
20 somebody -- somebody from the office would make the run
21 up there and pick it up for him. Usually --

22 Q Go ahead.

23 A Usually it was me. Usually things didn't
24 happen -- usually people did not have to have things that
25 fast.

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1 Q Okay. So I take it that it would be more
2 customary if somebody was checking out a murder book,
3 they would look at it on-site there at the gym; is that
4 what you are saying?

5 A No, they wouldn't look at it -- if somebody
6 was checking out a murder book, they would either -- they
7 would probably call me ahead and I will fill out the card
8 for them, pull the murder book, and they will come by and
9 pick it up.

10 If I wasn't there and they had the key or
11 they went in there with the custodian, they might go into
12 the library and pull their spot, pull their case because,
13 you know, it was easy to find. So, you know, but that
14 would be the only time anybody else would be in there.

15 Q Okay.

16 A In other words, for most -- for 99 percent
17 of the time, I would know would who be in there because I
18 would be there.

19 Q If somebody wanted to review a murder book
20 there on-site at the gymnasium, were there facilities to
21 do that?

22 A No.

23 Q There were no desks, no office, or anything
24 like that?

25 A I had an office and I had a desk, but nobody

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1 -- nobody was invited into it there.

2 Q How big was your office?

3 A If it was -- if there was an investigator,
4 he took it with him.

5 Q Okay. How big was your office?

6 A My office was fairly small. It operated --
7 it was about the width of the entry area and the size --
8 the length of the entry area and the width is about one
9 desk, one-and-a-half desk wide. There were two desks in
10 there and one table, small table in the northwest corner,
11 and the lighting was poor. You could -- if people came
12 and visited, they didn't -- which I did not have very
13 many people -- came up and they did stop to pick up
14 something, you know, I would not talk to them in the
15 office, I would come out.

16 Q Okay. You used the phrase "property
17 custodian" and then you then used the word "custodian,"
18 was there some sort of custodian on-site there at the
19 gymnasium?

20 A What do you mean by "custodian" or are you
21 waiting for my explanation for that?

22 Q You used the phrase, sometimes if you
23 weren't available, a property custodian might do
24 something.

25 A The property custodian is the person --

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1 basically is the person who categorizes and files our
2 homicide evidence.

3 Q Okay.

4 A So that's the only custodian. Cleanup guys,
5 that's me, or else when the jail was in operation, I
6 might get a crew, you know, once every two months or
7 something like that to do a mop through.

8 Q And do you remember the name of the property
9 custodian in 1999?

10 A Shoot. Ford. There were two of them and
11 the one I remember, his last name was Ford. And I should
12 remember her full name, but I don't right now. Because
13 we used to walk about three, four miles a day. Ford.

14 Q A female named Ford?

15 A Yes.

16 Q Okay. And you thought there was a second
17 one as well?

18 A Yes.

19 Q Would that have been a female or a male?

20 A Female.

21 Q Okay. There was something -- I think it was
22 in your declaration that you talked about the rare
23 occasions that a member of the public, somebody from
24 outside the sheriff's department, might review a murder
25 book, and you limited it to victim's families.

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1 Do I have that right?

2 A No.

3 Q Tell me how I don't have that right.

4 A Victim's families never came up to the
5 library. Investigators might review their case with the
6 victim's family, they will talk the case out with them,
7 they will show them what they have, this thing and that.
8 But that would not be done in the library and I do not do
9 that.

10 People that we are talking about is that
11 there were occasions, not very many, in which authors had
12 gotten permission to look at certain files. And those
13 people, had they gone through the proper, you know,
14 clearances, and usually, I was advised that they were
15 coming from the bureau, would come in, and I would show
16 them the file that they want or else they could have come
17 in with another investigator, you know, that had the
18 clearance and he would bring him in and show him, show
19 him the things that he wanted to see.

20 But there has only been a couple. I can
21 remember only about two or three people that did that.

22 Q Do you remember any of those author's names?

23 A Okay. Yeah. James Ellroy. And he came in
24 with -- he came in with Bill Stoner. And one of the
25 occasions with that was that Bill Stoner was a homicide

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1 -- retired homicide investigator sergeant, and he
2 basically, they basically reworked -- what was the
3 author's name again?

4 Q You said James Ellroy maybe?

5 A Yeah, Ellroy.

6 Yeah, he basically reworked his mother's
7 case and James Ellroy wrote a book about that
8 reinvestigation.

9 Q Okay.

10 A And Stoner was the homicide representative,
11 as they are doing this, and that got a lot of publicity.

12 The other one that I remember that was there
13 for several days was a person that wanted access to our
14 files on the Sirhan Sirhan case.

15 Remember, even though he was there, I did
16 not provide any of these people with any place to sit
17 down. I did not provide them with -- they had to make do
18 and find -- they had to make do with what they had and
19 find their own comfort zone. And those items didn't
20 leave the library.

21 Q So these authors, Ellroy and the Sirhan
22 Sirhan guy conducted their review there on-site at
23 gymnasium?

24 A Yes. There might have been a few other
25 people that came in with investigators, investigators

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1 brought them in to view whatever they wanted to view, but
2 it was all legit as far as their having clearance and
3 stuff like that. And unless the investigator checked out
4 that file, which I wasn't questioning if an investigator
5 was there, I would have my -- I would have my eight-by-11
6 card to put into the spot.

7 Q You have used the word "permission" and you
8 have also used the word "clearance," that these authors
9 had to get permission or clearance, how would they go
10 about doing that?

11 A Well, first of all, they would have to
12 contact the sheriff's information bureau and make a
13 request to see a certain case or file, whatever.

14 The sheriff's information bureau would then
15 forward that to the admin sergeant at the homicide bureau
16 and, of course, the captain would get involved in this,
17 and they would make a decision as to whether they would
18 approve or reject this application. If it was approved
19 somewheres along the line, I was notified that so and so
20 would be coming and I would know who it was. People just
21 didn't walk up and say, "Hey," and flash me some paper.
22 I knew specifically who was coming and why.

23 Q Do you remember any instances of an author
24 showing up without an investigator accompanying the
25 author?

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1 A No.

2 MR. CATE: This is a good stopping point. Do you
3 all want to take a break? We have been going about an
4 hour.

5 MS. BIRENBAUM: Do you have not estimate of how
6 much longer you have?

7 MR. CATE: I am halfway through my outline.

8 MS. BIRENBAUM: Are you okay to keep going,
9 Mr. Danoff?

10 THE WITNESS: I'm okay.

11 MS. BIRENBAUM: What about you, Ms. --

12 THE STENOGRAPHIC REPORTER: I am fine to keep
13 going. It is up to you guys.

14 MS. BIRENBAUM: Okay, let us know if you need a
15 break.

16 BY MR. CATE:

17 Q Would most murder books be kept, if they
18 were large enough, in a box?

19 MS. BIRENBAUM: I am going to object. It calls for
20 speculation.

21 BY MR. CATE:

22 Q You can answer the question.

23 A Okay. Remember I was telling you that we
24 start collecting information, right, we start collecting
25 paperwork, pictures, we start collecting a lot of junk.

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1 Pretty soon, that junk is a lot larger than your poor
2 boy. So you might go to two poor boys. But eventually,
3 it might go to be a box. When you finally end up with
4 all this stuff, it is big enough for a box.

5 Some of these investigations, Sirhan Sirhan,
6 which wasn't our original handle, but because he was in
7 our custody and we were there at the scene, those
8 become -- those are basically in four-tier cabinets,
9 four-drawer cabinets. Sometimes two or three.

10 So it all depends on how big the
11 investigation is as far as you are collecting all these
12 -- all this information.

13 Q The boxes could be used to hold a murder
14 book?

15 A Boxes, if I -- if the case is stored in a
16 box, the murder book would be part of that box, plus the
17 one that is on file, you know, at the office.

18 Q I am trying to skip down through my outline
19 to not repeat things we've already covered.

20 Do you recall having a conversation with
21 anyone regarding the contents of the murder book
22 regarding Ms. Wood's death?

23 A The contents, no.

24 Q Do you recall having a conversation with
25 anyone regarding any files regarding Ms. Wood's death

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1 that weren't in her murder book?

2 A I don't know what files are in the murder
3 book. So I don't -- you know, I never saw any paperwork
4 regarding that case. The only thing that I did with that
5 case is, like I had written, was all hearsay. This is
6 office talk. Everybody -- you know, it's a small office.
7 We are homicide investigators, we are inquisitive. We
8 know what is happening around us. This is a case that
9 people talked about. I had the same type of knowledge.
10 Nothing inside, just the same stuff as everybody else
11 would have access to.

12 Q Were you aware that Ms. Wood's body had
13 undergone an autopsy?

14 A I assumed that it had because she died.
15 There is no doctor to sign.

16 Q Had you ever seen the coroner's report
17 regarding that autopsy?

18 A No.

19 Q Have you ever seen any photographs taken in
20 connection with the autopsy of Ms. Wood?

21 A No.

22 Q Do you have an opinion as to whether the
23 murder book regarding the investigation into Ms. Wood's
24 death contains photos taken in connection with her
25 autopsy?

1 MS. BIRENBAUM: I am going to interject a bunch of
2 objections here. It calls for speculation. It's beyond
3 the scope of this lay witness's testimony. It is
4 overbroad.

5 If you can answer the question, sir, you are
6 welcome to answer it.

7 BY MR. CATE:

8 Q You can answer the question, Mr. Danoff.

9 A I would assume with the scope of this
10 investigation, that there were autopsy reports and
11 photographs would be a part of that file.

12 Q Would it surprise you if the murder book did
13 not contain autopsy photos?

14 MS. BIRENBAUM: Again, I am going to object that it
15 calls for speculation.

16 You can answer.

17 THE WITNESS: The murder book probably did not have
18 -- I would assume the murder book would not have the
19 autopsy photos. It would have the coroner's report.
20 Photos would be in the case file.

21 BY MR. CATE:

22 Q Where would the case file be kept? Is that
23 something in the library?

24 A That would either be with the investigator,
25 or the person who is acting as the investigator at that

1 particular point in time, or it would be in the library.

2 Q Do you know a gentleman named Ralph
3 Hernandez who worked as a deputy sheriff in the sheriff's
4 department homicide bureau?

5 A It doesn't jump out at me, no.

6 Q That's fine.

7 Let me preface my next question with some
8 background information about two of the book authors that
9 have been discussed in Mr. Perroni's lawsuits.

10 Mr. Hernandez gave testimony at Mr. Perroni's prior
11 lawsuit that the sheriff's department's files concerning
12 the investigation into Ms. Wood's death have been split
13 into two portions: The 1981 investigation and then the
14 2011, the investigation that started in 2011, the
15 reinvestigation.

16 Mr. Hernandez testified that he determined
17 that access to portions of the 1981 files have been
18 provided to persons, including Ms. Finstad and to an
19 author named Sam Kashner. Mr. Hernandez testified that
20 these individuals were provided access to portions of the
21 1981 file in the years between the sheriff's department's
22 closing of its investigation into Natalie Wood's death
23 and the reopening of the investigation in 2011.

24 With that background regarding why I am
25 asking you questions about those two authors, let me ask

1 you this: First, do you know Sam Kashner?

2 A No.

3 Q I take it you don't recall ever speaking to
4 Mr. Kashner?

5 A No.

6 Q Do you know if you have ever communicated in
7 writing with Mr. Kashner?

8 A No.

9 Q Have you ever provided documents to
10 Mr. Kashner?

11 A No.

12 Q Will you agree with me that there can be a
13 distinction between giving something to someone or giving
14 someone access to something?

15 Like I could directly give you a book or I
16 could tell you, "Hey, there is a book down the hall in my
17 office, you are welcome to grab it."

18 Does that distinction make sense to you?

19 A I know what your distinction is, but it
20 doesn't apply to me.

21 Q That's fine. I want to ask the last
22 question a little bit different now.

23 Have you ever provided Mr. Kashner with
24 access to any documents?

25 A No. Specifically on this case -- on the

1 Wood's case, no.

2 Q Anything in general with Mr. Kashner?

3 A No.

4 Q All right. And then forgive me, this is
5 going to get tedious I am afraid, but I want to be
6 specific with my questions. Did you provide any kind of
7 opportunity for Mr. Kashner to have access to any kind of
8 documents?

9 A No.

10 MS. BIRENBAUM: Objection.

11 That's okay. Wait until I object next time.
12 I will let your question go.

13 THE WITNESS: No.

14 BY MR. CATE:

15 Q Let me ask this: Do you know anything about
16 Mr. Kashner being provided access by someone else to
17 anything from Ms. Wood's death investigation?

18 A No.

19 Q Let me ask you those similar questions
20 regarding Ms. Finstad.

21 MS. BIRENBAUM: Can I make one objection for all of
22 the line of questioning and just put it out there or
23 after you ask a question, I will make my objection as a
24 standing objection to the set of questions?

25 MR. CATE: You make whatever objections you think

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1 you need to make.

2 MS. BIRENBAUM: I think it will go more efficiently
3 that way.

4 MR. CATE: Do you want to make it now?

5 MS. BIRENBAUM: Pose your question, I will object,
6 he'll answer. Okay?

7 BY MR. CATE:

8 Q As I mentioned, Mr. Danoff, Ms. Finstad has
9 identified you as a person who provided to her access to
10 Ms. Wood's murder book.

11 First off, do you know Ms. Finstad?

12 MS. BIRENBAUM: You can answer. I don't have
13 objections.

14 THE WITNESS: No, I don't know her. I have -- the
15 name doesn't mean anything to me other than it was
16 brought to my attention with this -- with this case, this
17 investigation.

18 No, I don't know her.

19 BY MR. CATE:

20 Q Bear with me as I ask these questions then.

21 Do you recall ever speaking to Ms. Finstad?

22 A No.

23 Q Do you recall ever communicating with
24 Ms. Finstad in writing?

25 A No.

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1 Q Did you ever provide any kind of document or
2 documents to Ms. Finstad?

3 A No.

4 Q Did you ever provide Ms. Finstad with access
5 to any documents?

6 A No.

7 Q Did you ever provide any kind of opportunity
8 for Ms. Finstad to have access to any documents?

9 A No.

10 Q Do you know anything about Ms. Finstad being
11 provided access by anyone else to anything regarding the
12 investigation into Ms. Wood's death?

13 A No.

14 Q Mr. Hernandez's testimony suggests that
15 there may have been other persons who had access to
16 portions of the 1981 files regarding the death
17 investigation into Ms. Wood.

18 MS. BIRENBAUM: That calls for speculation as to
19 your representation about what Detective Hernandez's
20 declaration or testimony may have suggested.

21 Other than that, I'm just making the
22 objection for the record. The witness can answer.

23 MR. CATE: That's fine.

24 MS. BIRENBAUM: Do you need the question reread?

25 MR. CATE: There is no question yet.

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1 Q Have you ever provided documents from the
2 murder book regarding Ms. Wood's death to anyone outside
3 the sheriff's department?

4 A I have never provided documents to anybody
5 because I have never seen documents from that file.

6 Q Have you ever provided access to documents
7 from the investigation into Ms. Wood's death to anyone
8 outside the sheriff's department?

9 A I have no recollection of ever pulling that
10 file or handling that file or ever providing access to
11 anybody else -- to anybody -- for that file.

12 Q Do you recall ever hearing that a member of
13 the public had received access to anything from
14 Ms. Wood's murder book?

15 A I might have heard that, but I don't know
16 anything about that.

17 Q You said you might have heard that, would
18 you have heard that when you were an employee of the
19 sheriff's department?

20 A No.

21 Q When might you have heard that?

22 A I don't know. I'm just -- I don't even know
23 if I did hear it to be honest with you, but because of
24 the nature of this investigation here, just something --
25 I just might have heard that -- I might have heard

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1 someplace and it wasn't from the sheriff's department,
2 maybe it is something from the public or something,
3 newspaper, stuff like that, but I don't -- I have no
4 knowledge of that.

5 Q Okay.

6 A I don't want to open up another can of
7 worms, but I just -- I'm trying to answer you truthfully,
8 and I don't know which -- to be truthful, I guess I don't
9 know. But I just thought I heard something like that.
10 Maybe I just assumed it. Maybe I just assumed it because
11 there was so much speculation, so many books that had
12 been written, and so much -- this case has been opened
13 several times or at least one other -- two other times
14 that I really don't -- everything that I have heard from
15 that would have been through the news or they recently
16 had a documentary on her life and death that I did see.

17 Q The HBO documentary?

18 A Yes.

19 Q We are here to open cans of worms, so if you
20 do remember where you might have heard that about the
21 members of the public receiving access to the file,
22 please speak up.

23 MS. BIRENBAUM: I am going to interject that it
24 obviously wouldn't cover anything that is attorney/client
25 privilege, any conversation Mr. Danoff would have had

1 with counsel.

2 BY MR. CATE:

3 Q I am not trying to elicit any conversations
4 you had with Ms. Birenbaum or anyone with her law firm.
5 That's a privileged conversation.

6 Do you remember any conversations you had
7 with anyone not a member of the sheriff's department and
8 not your counsel and not me today regarding Ms. Wood's
9 murder book?

10 A No.

11 Q In the declaration you signed last summer,
12 and for Counsel, I will tell you, I'm looking at
13 paragraph 14 of that declaration, you testified, "I have
14 no recollection of ever talking to or meeting with a
15 female author by the name of Suzanne Finstad."

16 Mr. Danoff, do you remember giving that
17 testimony?

18 A I wrote it, yes.

19 Q To me, there is a distinction between an
20 outright denial and just saying "I have no recollection."

21 So I want to understand, are you telling us
22 you definitely remember not talking to anyone by the name
23 of Ms. Finstad or you just don't recollect it?

24 MS. BIRENBAUM: Calls for speculation.

25 THE WITNESS: Is this something I answer or no?

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1 MS. BIRENBAUM: It's vague and ambiguous. It's
2 phrased as a double negative. It's vague and ambiguous.

3 MR. CATE: You can answer the question.

4 MS. BIRENBAUM: If you understand it, you can
5 answer the question.

6 THE WITNESS: Repeat the question.

7 BY MR. CATE:

8 Q Let me ask it a different way. Is your
9 testimony today that you definitely remember not talking
10 to Ms. Finstad or is your testimony "I don't recall it,
11 but it could have happened"?

12 MS. BIRENBAUM: Object. It is vague and ambiguous,
13 but you can answer.

14 THE WITNESS: I don't recall ever talking to this
15 person. I'm not telling you that I didn't talk to her,
16 but I didn't talk to her about this case and I can -- I
17 will stand on that.

18 BY MR. CATE:

19 Q Okay. I appreciate that.

20 If Ms. Finstad were to testify under oath
21 that she definitely remembers meeting with you and
22 getting access to the murder book, would you say that's
23 not truthful testimony?

24 MS. BIRENBAUM: Calls for speculation.

25 THE WITNESS: Do I answer? Is this an answer or

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1 not?

2 MS. BIRENBAUM: If you can.

3 THE WITNESS: Okay.

4 MS. BIRENBAUM: He is asking if something were to
5 happen in the future, how would you respond.

6 BY MR. CATE:

7 Q Please answer the question.

8 A I would say -- I am saying, no, I never
9 talked to her about this case.

10 Q Okay. Were you surprised when you learned
11 that Ms. Finstad had written in a book that you had been
12 the person who provided her access to the murder book
13 regarding the investigation into the death of Ms. Wood?

14 A I just basically recently just learned about
15 what it was she wrote and how she got it, but yeah, I was
16 surprised. Yes, very much.

17 Q Did you make any effort to contact
18 Ms. Finstad to challenge her account?

19 A No.

20 Q Have you --

21 A I did not even know she wrote a book.

22 Q I take it it was about a year ago that she
23 published the book that mentioned you.

24 A I didn't know about her writing a book, I
25 didn't read the book, I never read any book on this case,

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1 including a murder book.

2 Q In the book, Ms. Finstad makes the claim
3 that Dewayne Rasure was the lead homicide detective
4 investigating the death of Ms. Wood. Do you know if that
5 is true?

6 A I believe so, yes.

7 Q Am I saying that name correctly, Rasure?

8 A Rasure.

9 Q Rasure. Thank you.

10 Did you know Detective Rasure?

11 A Yes.

12 Q Did you ever work with him on an
13 investigation?

14 A Yeah, he was my training officer in
15 homicide.

16 Q Besides being your training officer, were
17 you all friends?

18 A Only through work.

19 Q You all had a good working relationship?

20 A Yes.

21 Q Ms. Finstad wrote in the book that she
22 described him as genial, which I take it to mean friendly
23 and cheerful.

24 Do you agree with that characterization --

25 A Yes.

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1 Q -- of Detective Rasure?

2 A Yes.

3 Q That's a yes?

4 A Yes.

5 Q Do you know if Detective Rasure knew

6 Ms. Finstad?

7 A I don't know. No, I don't know.

8 Q Did Rasure retire in the 1980s?

9 A I believe so, yes.

10 Q Did you communicate with him after he

11 retired?

12 A I think I saw him one time at some

13 retirement gathering, and that was it.

14 Q Do you recall ever having a conversation

15 with Detective Rasure about the investigation into

16 Ms. Wood's death?

17 A Never had a conversation about this case

18 with him.

19 Q Do you recall ever having a conversation

20 with Detective Rasure about Ms. Finstad?

21 A Nope. No.

22 Q Do you recall ever having a written

23 communication with Detective Rasure about the

24 investigation into Ms. Wood's death?

25 A Never had a written communication with

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1 Rasure.

2 Q Ms. Finstad wrote in her book that you had
3 the nickname of "Sweet Lou." Is that a nickname that
4 co-workers called you?

5 A Sweet Lou was used only by the black
6 deputies that worked with me at Lenox Station when I was
7 working patrol and by Gil Carillo, homicide investigator.
8 They called me "Louie the Hat." People don't know my
9 name.

10 Q They called you "Louie the Hat"?

11 A Yeah.

12 Q Why is that?

13 A Because I always wear a hat.

14 Q Ms. Finstad described you as an L.A.P.D.
15 detective. You never worked for the L.A.P.D.; right?

16 A That's right.

17 Q Was your title ever "Detective"?

18 A I've always introduced myself as an
19 investigator. The word "investigator" and "detective"
20 are probably interchangeable, but to me, the difference
21 is that I am -- I work to find the truth. So I call
22 myself an investigator and I probably worked my best work
23 in clearing people.

24 Q In clearing people?

25 A Yeah, unfortunately. Yeah.

1 Q Were you ever disciplined by the sheriff's
2 department for anything related to Ms. Wood's murder book
3 or file?

4 A No.

5 MS. BIRENBAUM: Belatedly invades his right to
6 privacy, but he answered it.

7 MR. CATE: Let's take a break. Let me confer with
8 my client.

9 (Recess taken.)

10 MR. CATE: Back on the record.

11 MS. BIRENBAUM: We're back on the record. We are
12 just not going to see your face. Okay?

13 THE WITNESS: Okay.

14 BY MR. CATE:

15 Q Mr. Danoff, you mentioned two property
16 custodians at the gym, two females, one with the last
17 name of Ford. Do you happen to remember her first name?

18 MS. BIRENBAUM: Asked and answered.

19 You can answer again.

20 THE WITNESS: I should remember it, but I don't. I
21 don't remember her first name.

22 Cheryl. Cheryl Ford.

23 BY MR. CATE:

24 Q Thank you for that. I'm not trying to -- I
25 know your counsel is going to object as asked and

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1 answered. I am just seeing since we have made progress
2 since I asked the question earlier, do you happen to
3 remember the name of the other female custodian?

4 A No.

5 Q Okay. If you happen to remember that
6 tonight or tomorrow, would you let your counsel know that
7 name?

8 A Yes.

9 MS. BIRENBAUM: I'm will go one more, we can leave
10 a blank in the deposition transcript. If he remembers it
11 in the time between now and him signing the transcript, I
12 am okay with him filling it in if Counsel would like.

13 MR. CATE: I appreciate the -- it can show up in a
14 errata sheet. Thank you for that, Mr. Danoff.

15 (Information requested: _____
16 _____.)

17 BY MR. CATE:

18 Q Did you work with a gentleman with the last
19 name of Garrison?

20 A The name is not familiar to me.

21 Q It's not?

22 A No.

23 Q Did you work --

24 A I might have, but I don't recall it, no.

25 Q I'm trying to remember some -- I am trying

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1 to see what you know about some potential witnesses here.

2 Did you work with a gentleman by the name of
3 Hamilton?

4 A Yeah, Hamilton was in the bureau the same
5 time I was. We had worked the Metropolitan bureau before
6 coming to the bureau, so I know Hamilton, yeah, but I
7 never worked with him though.

8 Q Do you remember Hamilton's first name?

9 A Roy.

10 Q Roy Hamilton.

11 Do you remember Roy Hamilton's position?

12 A He was a homicide investigator. I think he
13 was Rasure's partner.

14 Q Did you -- do you recall having any
15 discussions with Mr. Hamilton regarding Ms. Wood's death?

16 A Never had a conversation with him about
17 this. No.

18 Q Let's talk about Rasure for a moment. Do
19 you recall Mr. Rasure ever showing you photographs of
20 Ms. Wood?

21 A No. He never showed me anything from the
22 file, nor did we talk about it.

23 Q Do you have any recollection of ever hearing
24 that Rasure was showing photographs of Ms. Wood?

25 A No.

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1 Q Once Rasure would have closed the
2 investigation, where would those poor boys and other
3 parts of his file go? Would they be consolidated into a
4 murder book?

5 MS. BIRENBAUM: Calls for speculation. Asked and
6 answered.

7 BY MR. CATE:

8 Q You can answer the question.

9 A Like I said before, all of the paperwork
10 that he had accumulated and everything that he had put
11 into the file, including anything that -- including in a
12 murder book, photographs, and anything else would have
13 gone into a -- either a cardboard box or a poor boy or a
14 file cabinet, you know, under that case name and been
15 filed at the library.

16 Q Thank you for that.

17 Once an investigation is closed, would the
18 records be kept together regarding that investigation?

19 A Yes.

20 Q Okay. You discussed the eight-
21 and-a-half-by-eleven card that you would stick in the
22 library when someone checked out a murder book. Do you
23 recall that?

24 A Yes.

25 Q If you wanted to go lay your hands on that

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1 card today regarding Ms. Wood's murder book, would you
2 know where to look for that?

3 A No. I don't even know what their system is
4 today. I mean, I know that it's changed to a different
5 system, but I don't know what their protocol is.

6 Q You testified about the library system being
7 converted to a computer system at some point; correct?

8 A Yes, it was converted twice as a matter of
9 fact. When I -- when Bill McComas went to the unsolved
10 team, he put the card system into a small, you know,
11 homemade-type of computer program. And then when Lynn
12 Reader came onboard, he reentered it and made it
13 compatible to the new computerized system that the
14 homicide bureau and the department was using.

15 Q When you retired, these computer systems
16 were not in place yet; correct?

17 A That's right.

18 Q You were still using the card system when
19 you retired?

20 A When I stopped being librarian, yes.

21 Q There is no dispute in this lawsuit or at
22 least in the prior lawsuit, there was no dispute that
23 Ms. Finstad did receive portions of the sheriff's
24 department file regarding the death of Ms. Wood and
25 copies of those documents were produced to Mr. Perroni.

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1 Your testimony today is that you would not have been the
2 person to produce those documents to Ms. Finstad. Do you
3 know who else would have been in a position to provide
4 Ms. Finstad with portions of the file?

5 MS. BIRENBAUM: Calls for speculation.

6 BY MR. CATE:

7 Q You can answer the question.

8 A I don't know. The original investigators I
9 knew and I never talked about this case with them. The
10 second investigation or third investigation that was
11 reopened up -- actually, I never talked about this case
12 with anybody, but -- and after I retired, I did not have
13 access to the library. Even as a reserve working out of
14 homicide, I didn't have access to the library.

15 So I don't know.

16 MR. CATE: Mr. Danoff, I appreciate your time
17 today. I pass the witness.

18 MS. BIRENBAUM: I don't have any questions.

19 MR. CATE: All right. Mr. Danoff, I appreciate
20 your time today and thank you for working with us with
21 and doing this over Zoom.

22 THE WITNESS: You are welcome. Thank you.

23 MS. BIRENBAUM: Are we off the record?

24 MR. CATE: Off the record.

25 (The matter was adjourned at 3:52 p.m.)

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1 DECLARATION UNDER PENALTY OF PERJURY

2
3 I, LOUIS DANOFF, do hereby certify under
4 penalty of perjury that I have read the foregoing
5 transcript of my deposition taken MARCH 26, 2021; that I
6 have made such corrections as appear noted on the
7 Deposition Errata Page, attached hereto, signed by me;
8 that my testimony as contained herein, as corrected, is
9 true and correct.

10
11 Dated this ____ day of _____,
12 2021, at _____,
13 California.

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17 _____
18 LOUIS DANOFF
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DEPOSITION ERRATA SHEET

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LOUIS DANOFF

DATED

March 26, 2021

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1 STATE OF CALIFORNIA)
2)
3 COUNTY OF LOS ANGELES)
4 _____)

4 I, Karen Vilicich, CSR 7634, Certified Shorthand
5 Reporter, do hereby certify:

6 That prior to being examined, the witness named in
7 the foregoing deposition was by me duly sworn;

8 That said deposition was taken down by me in
9 shorthand at the time and place therein named and
10 thereafter transcribed under my direction;

11 I further certify that I am neither counsel for, nor
12 related to, any party to said proceedings, not in anyway
13 interested in the outcome thereof.

14 I declare under penalty of perjury under the law of
15 the State of California that the foregoing is true and
16 correct.

17 Dated: April 9th, 2021

18

19



20 Karen Vilicich
21 CSR No. 7634, CRR

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