

COMPLAINT - GREGORY DEGER

Employee: Gregory Deger
Santa Clara Police Department

Complainant: Garrett Bondaug
[Address Redacted]

Police Report: 11-12465

Please note that within two weeks from this incident a **filing of an official complaint was attempted but records of the incident and a complaint form were denied Mr. Bondaug by officer Steven Ernst** who was working the front records desk at Santa Clara Police Department. A letter from Records Manager, Gina McWilliam, on behalf of the acting Police Chief, Kevin Kyle, is attached to this complaint.

A Santa Clara County Grand Jury, in its 2012-2013 Final Report, found that the City of Santa Clara and its police department (1) did not provide Public Access to Complaint Procedure and (2) did not provide either online, in the lobby or by request Public Access to Complaint Form. Subsequently, it wasn't until **September 25, 2013** when Mayor Jamie Matthews, City Manager Julio Fuentes, and Police Chief Michael Sellers confirmed that the Grand Jury's findings were acknowledged and Grand Jury recommendations for remedy implemented. A copy of the City of Santa Clara's response to "2013-2013 Santa Clara County Civil Grand Jury, Law Enforcement Public Complaint Procedures" is attached to this complaint.

INCIDENT/TIME: December 2, 2011

INCIDENT CASE NUMBER: 11-12465

INCIDENT LOCATION: [Redacted] Wilson Court, Santa Clara, CA 95051

EMPLOYEES INVOLVED (IF KNOWN): Gregory Deger, Colin Stewart, Thomas Nelson, Lauren Larsen (Eldridge), David Schneider, Cory Morgan, Derek Rush, Wahid Kazem, Jamie Ellis.

WITNESSES: Daniela [REDACTED], Sandra [REDACTED], Tatiana [REDACTED]

Complaint against Gregory Deger, Santa Clara Police Department

1. Deger intentionally failed to follow police procedure.
2. Deger made his report or conducted police business in less than a truthful and/or cooperative manner.
3. Deger failed to complete reports accurately and completely.
4. Deger used Unnecessary and Excessive Force.
5. Deger did not report use of force accurately either orally or in writing, as required by SCPD.
6. Deger's conduct harmed and discredited is reputation and that of the department.
7. Deger committed perjury.

THE FOLLOWING HAPPENED:

1. **Failure to follow Santa Clara Police Department Procedure for 415(d) call for service.** Upon receiving a call for service, Gregory Deger, at the time a peace officer with the Santa Clara Police Department, responded to the area estimated by reporting party. **Deger knew that policy mandates two officers respond to an alleged 415(d).** In responding to this call for service, Deger took it upon himself to break from department protocol by approaching the property he presumed to be the residence for service without a backup officer. **I ask that an independent investigator consider the below facts in finding that Deger intentionally violated department policy while responding to an alleged 415(d) on December 2, 2011 at [REDACTED] Wilson Court.**

- a) Prior to arriving at Wilson Court, officer **Deger knew his back up unit was just a couple minutes away from the subject area.**
- b) After exiting his patrol vehicle, Deger walked approximately 80 yards towards the bulbous end of [REDACTED] Wilson Court. During his walk, **Deger never heard a single sound of disturbance from any of the residences, on the street or in the surrounding environment.**
- c) Prior to stepping foot onto the [REDACTED] Wilson Court property, **Deger knew his back up was on scene.**
- d) While standing on the porch of the [REDACTED] Wilson Court residence, **Deger observed that the porch was well lit, there was no sign of a struggle or anything out of the ordinary.**
- e) **Without evidence or sign that there was an exigent need for assistance,** officer Deger voluntarily, and in breaking department policy, knocked on the door or rang the doorbell without his back up next to him.
- f) Deger incompetently, negligently and possibly intentionally, informed Ms. [Daniela] that a call for service originated from her residence causing confusion.
- g) Ms. [Daniela], 63 years old at the time, told officer Deger that no one from the residence made a call for assistance and that everything was fine.
- h) In addition to Ms. [Daniela]: Ms. [Sandra], Ms. [Tatiana], and Mr. Bondaug all told officer Deger that everything was fine and that no one had called for assistance from Ms. [Daniela]'s residence.
- i) Deger did not attempt to validate the call for service with dispatch or the reporting party.
- j) **Deger never witnessed physical, emotional, or psychological distress** to any of the persons standing before him.
- k) **Deger never witnessed a physical assault or a threat of a physical assault** by Mr. Bondaug to anyone at [REDACTED] Wilson Court.

- l) Deger was the only person to threaten physical violence upon anyone at [REDACTED] Wilson Court.
- m) Officer Deger was the only person to caused physical and emotional harm upon anyone at [REDACTED] Wilson Court.

2. **False Police Report. Officer Deger's Police Report is Full of Inconsistencies. I ask that an independent investigator consider the below facts in finding that Deger made his report and conducted police business in less than a truthful and/or cooperative manner intentionally violating department policy.**

- a) Deger refuses to admit that Ms. [Daniela] was the person who answered the door. All witnesses have been consistent in their testimony that it was in fact Ms. [Daniela] who answered the door and logically it makes sense as the other three witnesses don't reside there. Deger intentionally ignores Ms. [Daniela] as the person who answered the door, omitted her presence at [REDACTED] Wilson Ct., and left her out of his report.
- b) All four witnesses are independently consistent that Deger told them the call for service originated from the [REDACTED] Wilson Court residence. Deger's statement to the occupants of [REDACTED] Wilson Court was false.
- c) All four witnesses testified independently that Mr. Bondaug never pushed his mother aside. Deger's report that one of the women was a victim of domestic violence is unsupported, contradicted by all witness testimony, and utterly false.
- d) In stark contrast to Deger's report, the porch of [REDACTED] Wilson Court was not "a low lit area, further darkened by the late hour..." and there was no "dusty bulb" as Deger would go on to falsely testify. Witnesses at the residence testified that the porch was well lit. Officer Stewart testified that the porch was so well illuminated that he could see officer Deger clearly from 80 yards away. Deger's report of a dimly lit porch is knowingly false.
- e) Deger claims that Mr. Bondaug slurred his speech. The EMT, fire-paramedics, and VMC hospital staff all confirmed that Mr. Bondaug's communication and awareness was clear. Further supporting all witness testimony that Mr. Bondaug's speech was clear and not slurred is an audio recording surreptitiously made and lodged by officer Larsen (Eldridge) and testimony by officer Ellis that Mr. Bondaug was cordial and engaging in conversation, Deger's report of Mr. Bondaug having slurred speech is knowingly false.

- f) “Bondaug was attempting to hide a crime...I also believed one of the females subjects in the house was a victim of domestic violence.” Deger never factually believed this. **Officer’s Stewart, Nelson, Schneider, Morgan, Eldridge and supervisor Sgt. Derek Rush were never told by Deger at the scene that he believed one of the women were the victim of domestic violence.** None of the officers asked the women if they witnessed or had been the subject of threats, assault or battery. **Deger knowingly falsified his report to make it fit his actions.**
- g) “[Sandra] stepped forward and positioned herself between Bondaug and me.” **This is a false statement in Deger’s report, a statement that would become even more bizarre at testimony and under penalty of perjury** (see perjury below). All witnesses testified that Ms. [Sandra] never stepped onto the porch and was never in between Deger and Mr. Bondaug.
- h) Physically Combative: Deger wildly claims that Mr. Bondaug initiated a physical confrontation with him but his claim is contradicted by all witnesses. **Deger’s report that Mr. Bondaug was physically combative is false and resulted an unsubstantiated arrest, failed prosecution and injury to a person who never committed a crime.**
- i. There are a few misdemeanor and/or felony charges that could have been brought by Deger *if* in fact Mr. Bondaug has actually grabbed Deger’s forearm. Deger never told any other officers at the scene that Mr. Bondaug grabbed him and no charge of assault on a peace officer was ever introduced or even alleged. **Deger’s post-incident writing of physical contact initiated by Mr. Bondaug is vehemently refuted by Mr. Bondaug, Ms. [Daniela], Ms. [Sandra], Ms. [Tatiana] and officer Stewart testified that he never observed Mr. Bondaug reach for Deger. Deger’s claim and post-incident report that Mr. Bondaug touched him is completely false.**
 - ii. All witnesses wrote statements soon after the incident and would later testify that Mr. Bondaug never reached towards Deger or touched him.
 - iii. Officer Colin Stewart testified that Mr. Bondaug was just standing and never attempted to strike or kick at Deger. Stewart would also testify that Mr. Bondaug never moved toward or struck, in any manner, at Deger.
 - iv. While taking pictures of Deger’s injuries, Deger never pointed to a place where Mr. Bondaug supposedly grabbed his forearm with a tightening grip. **There is no evidence to support Deger’s claim.**

3. Wrongful Arrest for 647(f) Drunk in Public. While no more than three feet from all four witnesses – Ms. [Daniela], Ms. [Sandra], Ms. [Tatiana] and Mr. Bondaug: Officer Deger proclaimed that he was going to arrest Mr. Bondaug. When asked “for what” Deger replied, “drunk in public.” This caused much confusion among the witnesses as they knew none of them were intoxicated and they were not in a public place. Ms. [Daniela], Ms. [Sandra] and Ms. [Tatiana] were in the residence of Ms. [Daniela] while speaking to Deger. Mr. Bondaug was standing on Ms. [Daniela]’s porch in front of the screen door. **I ask that an independent investigator consider the facts below and find that Deger did in fact arrest Mr. Bondaug for 647(f) and then colluded with fellow officers and supervisors to cover up the illegal and unconstitutional arrest.**

- a) Independent from any evidence Santa Clara Police Department possessed, prior to any officer depositions, and before evidence was presented to Mr. Bondaug’s attorney, **Ms. [Sandra] testified on September 3, 2014** that Deger proclaimed he was arresting Mr. Bondaug for being drunk in public, 647(f). (page 28, lines 13-15)
- b) **December 3, 2014** attorney for the City of Santa Clara, John Haeblerlin, handed attorney Steven Uzo a CD containing evidence from Santa Clara Police Department. On that CD were two pictures (DSC03415, DSC03417) taken by officer Chris Bell that depicts a ruler with “**647(f)/PC148**” written in the Crime section. **This corroborates Ms. [Sandra]’s independent testimony** that Deger arrested Mr. Bondaug for being drunk in public (647(f)) while at a private residence and with no evidence that Mr. Bondaug was drunk.
- c) Officer Chris Bell was not at the [REDACTED] Wilson Court scene on December 2, 2011. Officer Bell was tasked to take injury pictures of Deger and Stewart at the Santa Clara Police Department and of Mr. Bondaug at Valley Medical Center.
- d) **Officer Chris Bell testified that it was Deger who told him that Mr. Bondaug was arrested for 647(f)** therefore that’s what he wrote on the ruler seen in the pictures. **Officer Chris Bell’s independent recollection and testimony validates witness testimony of the event and directly contradicts Deger’s testimony. Deger intentionally lied and brazenly attacked officer Bell’s reputation of competence by redirecting culpability onto him.**
- e) After careful and meticulous review of all police reports, photographic evidence provided by SCPD, evaluation of independent witness testimony, and chronological event scrutiny, **it is the professional determination by Police Use of Force, Police Policy, and Police Investigations expert, Mr. Timothy Williams** (Los Angeles Police Department, retired) **that Deger initially arrested Mr. Bondaug for being Drunk in Public (647(f)) while standing at a**

private residence. An inappropriate arrest that was intentionally altered by Deger so it wouldn't show up on his report.

4. **Deger Used Unnecessary and Excessive Force.** There is simply no corroboration of Deger's claim that Mr. Bondaug interrupted his investigation of a call for service. Despite his fantasied report writing and scripted testimony, there is absolutely no evidence to support that Deger discovered a residential scene where a recent, or active, act of violence had occurred or was about to occur.
- There was never a reason for Deger to use force against Ms. [Sandra] or Mr. Bondaug. I ask that an independent investigator carefully consider the facts below and pay close attention to who was the first person or allegedly and/or factually physically contact another person in finding Deger used excessive and unreasonable force.**
- a) Ms. [Daniela], 63 years old at that time, opened the front door of her home and told Deger that no call was made from her home and that nothing had happened there.
 - b) While Deger was on the front porch and speaking to Mr. Bondaug, Ms. [Tatiana] walked outside and past Deger to make a call using her personal cell phone. Deger ordered Ms. [Tatiana] back into Ms. [Daniela]'s home. **There was no legal justification for Deger to order Ms. [Tatiana] back into Ms. [Daniela]'s home.**
 - c) Ms. [Sandra] and Ms. [Tatiana] were with Ms. [Daniela] at the threshold of the front door and **all three told them that there was no problem at Ms. [Daniela]'s home.**
 - d) Mr. Bondaug was standing on the front porch with Deger, separated from Ms. [Daniela], Ms. [Sandra], and Ms. [Tatiana] by a metal screen door.
 - e) Testimony by all three women mentioned above and testimony from officer Stewart is that **Mr. Bondaug never raised his hand or voice at Deger.**
 - f) While at the scene, **Deger never told other officers present that Mr. Bondaug had grabbed or attempted to physically touch him.**
 - g) According to page 3 of Deger's falsified report, he *swept Ms. [Sandra] out of the way.* **All witnesses contend that this action by Deger never happened.** To help SCPD's Professional Standards Unit in evaluating Deger's claim, I suggest scrutinizing these chronological facts...
 - i. The reporting party stated (refer to dispatch recordings and deposition of Kristopher [REDACTED]) that he did not see any type of altercation and could not identify the voices of party he reported hearing.

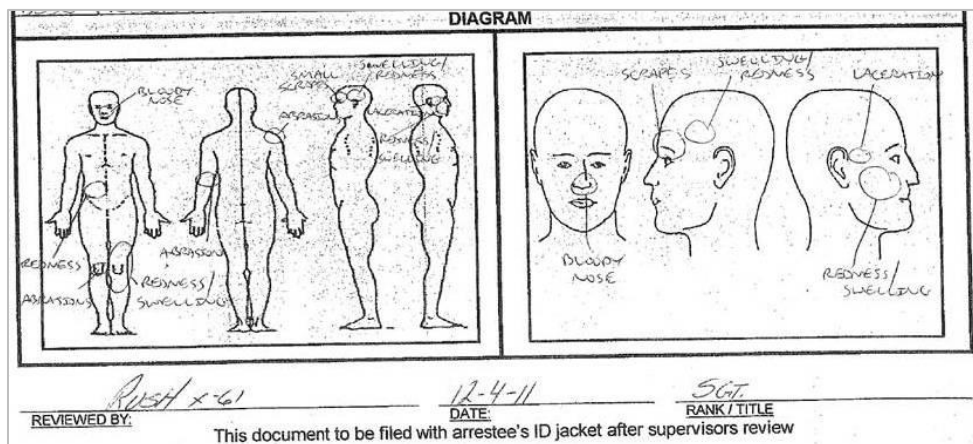
- ii. Upon exiting his vehicle on Wilson Court, Deger heard no noises or voices and did not witness any people outside of residence.
 - iii. While walking up the driveway of [REDACTED] Wilson Court, and while standing on its front porch, **Deger heard nothing out of the ordinary and saw no physical interaction between people. Deger had no knowledge of an imminent threat.**
 - iv. **While speaking with Ms. [Daniela] and surveying her front living room, Deger neither saw or heard anything out of order or suspicious.**
 - v. While Ms. [Daniela], Ms. [Sandra], Ms. [Tatiana] and Mr. Bondaug were all in his presence, **no one conveyed a fear of another or had signs of physical or emotional distress.**
 - vi. Deger was also told, and he noted in his report, by Ms. [Daniela] that no one else was present at the residence. Deger, nor any other officer, refuted Ms. [Daniela]'s statement.
 - vii. While in Deger's presence, neither Ms. [Daniela], Ms. [Sandra], Ms. [Tatiana], or Mr. Bondaug verbally threatened or touched each other. In fact, quite the opposite, they all stated that nothing was going on.
 - viii. **If Deger's written statement of *sweeping Ms. [Sandra] out of harm's way* were true, and it is not, then he would have been the first person to make physical contact with anyone else at that residence. Any touching of a person without their permission is unnecessary and excessive to investigate an alleged noise disturbance. *Deger grossly, intentionally, and maliciously embellished his police report.* **By his own account and report, Deger was the first person to touch someone else at [REDACTED] Wilson Court.****
 - ix. *Deger is the only person that threatened and assaulted any person at the [REDACTED] Wilson Court residence.* There is no justification of Deger touching Ms. [Sandra] and violently striking Mr. Bondaug.
- h) A expert medical witness for the City of Santa Clara found that Mr. Bondaug's permanent shoulder injury was sustained from the brutal assault conducted by Deger and Stewart.
- i. There are many more injuries on Mr. Bondaug's body than Deger has accounted for, this is willful omission on Deger's part.
 - ii. Mr. Bondaug has testified that his permanent shoulder injury was sustained from **Deger and Stewart "boot stomping" him while on the ground handcuffed.**

- iii. Ms. [Daniela], standing a few yards away in the street documented and testified that she clearly heard her son, Mr. Bondaug, stating to officers, “tell your officers to quit kicking me” while he was handcuffed and on the ground.

5. **Omission of Facts, Embellishment of a Police Report, False Testimony.** Throughout this entire ordeal, Deger has waffled on simple facts in an attempt to seem credible. I believe he was so enamored with his attorney’s offer to script testimony that he strayed far off course from what is the simple truth and reality. Even if independent from other acts of misconduct found in this complaint, **Deger’s failure to report use of force accurately - either orally or in writing as required by Santa Clara Police Department – is grounds for termination. I ask that an independent investigator consider the below facts in finding that Deger intentionally omitted facts, embellished his police report, and knowingly testified falsely.**

- a) **Santa Clara Police Manual section 26.3.3(BB)** provides: Testifying, making reports or conducting police business in a less than a truthful and/or cooperative manner is **grounds for discipline.**
- b) **Deger testified that Mr. Bondaug was placed in the back of his patrol car** while handcuffed. Mr. Bondaug refutes this and officers Stewart and Nelson both testify that they have no knowledge of this even though they were with Mr. Bondaug the entire time from porch to WRAP. **The act of placing Mr. Bondaug in the back of Deger’s patrol car is nowhere to be found on his police report,** on officer Stewart’s police report, in officer Nelson’s police report nor was it recalled in Sgt. Rush’s testimony. **Deger’s sworn testimony about Mr. Bondaug being placed in the back of his patrol car is knowingly false.**
- c) **Sgt. Rush, officers Larsen (Eldridge) and Morgan all testified that Mr. Bondaug was handcuffed on the ground, and not in the back of a patrol car** when they arrived on scene and helped put Mr. Bondaug in the WRAP. **There are serious and valid concerns regarding Deger’s veracity during this incident, in post-incident report writing, what he has told his supervisors and fellow officers, and what he has testified to under oath and in a Courtroom.**
 - i. Why would an officer (Deger) place a handcuffed arrestee in the back of his patrol car if only to pull them back out and place them on the ground before any other officers arrived? **This accusation is a lie and in a Courtroom, perjury.**

- ii. Why it is that officers Stewart and Nelson were with Mr. Bondaug and Deger the entire time – from punching Mr. Bondaug in the face on the porch, to placing him in handcuffs, and all the way to placing him in the WRAP down the street - but they don't have recollection or documentation of Mr. Bondaug being placed in back of Deger's patrol car? **Deger's assertion that he placed Mr. Bondaug in the back of his patrol car is complete fallacy and in a Courtroom, perjury.**
- d) There are only three officers (Stewart, Nelson, Deger) who put their hands on Mr. Bondaug's face and head but only one officer has admitted to striking Mr. Bondaug in the head. **Six of at least seven strikes to Mr. Bondaug's head is unaccounted for in Deger's police report.**
- i. Mr. Bondaug testified that the first physical engagement by officer Stewart was a fist strike to the left side of Mr. Bondaug's head. The diagram in Santa Clara Police Department's *Arrestee Injury Report* independently support Mr. Bondaug's claim that he was struck multiple times in the head. **Deger purposefully omitted this fact from his police report and intentionally lied in his deposition and during testimony.**
 - ii. Deger, officer Stewart, Mr. Bondaug, Ms. [Daniela], Ms. [Sandra] and Ms. [Tatiana] all testified that **Deger struck the left side of Mr. Bondaug's with is ASP baton and fists.** Deger testified that he struck Mr. Bondaug up to four times with his ASP baton and up to five times with his closed fist – the same closed fist that he held his ASP baton in. **The head, face and upper torso injuries to the left side of Mr. Bondaug coincide with the SCPD Arrestee Injury Report and Mr. Bondaug's testimony but do not comport with Deger's police report.**



- iii. The “swelling/redness” on the left side of Mr. Bondaug’s head comports with the ASP baton strike that he testified receiving from Deger. **Deger intentionally omitted this fact from his police report.**
- iv. In an audio recording filed by officer Larsen (Eldridge), officer Chris Bell is heard saying “you’ve got a pretty good lump on your head.” **It should be noted that none of the other multiple strikes to Mr. Bondaug’s body elicited such verbal notation from officer Bell’s observation** – not even Mr. Bondaug’s black eye.

6. Deger’s conduct is harming and discredits his own reputation and that of the department. In conjunction with the facts detailed above and the claim of perjury made below, **I ask that an independent investigator also look into the official records held by the City and Police Department of Santa Clara** where the investigator will find [REDACTED]. I believe Deger’s employment as a peace officer puts at risk the liberty and safety of all who reside, visit or pass through the City of Santa Clara and sullies the good name and reputation that other officers in Santa Clara are trying to maintain.

- a) Ms. [Daniela] has lived in the [REDACTED] Wilson Court residence since 1955, 56 years at the time of the incident, and **because of Deger’s actions is now very reluctant to rely on emergency services in the City of Santa Clara.**
- b) **Deger’s lack of professionalism** as a peace officer for the City of Santa Clara **has drawn enough attention from local media** that it is the subject of ongoing production.
- c) The fact that, in addition to this matter, **Deger has been [REDACTED] constitutes a pattern of [REDACTED] dishonesty while in uniform.**
- d) Given so many intentional flaws in Deger’s ability to follow department policy, separate fact from self-serving fiction, tell the truth to fellow officers, supervisors, and the Court., **Deger’s presence as an employee with the Police Department will likely discredit the City of Santa Clara** for as long as he remains employed in a peace officer capacity.

7. **Deger Committed Perjury.**

PENAL CODE SECTION 118. (a) Every person who, having taken an oath that he or she will testify, declare, depose, or certify truly before any competent tribunal, officer, or person, in any of the cases in which the oath may by law of the State of California be administered, willfully and contrary to the oath, states as true any material matter which he or she knows to be false, and every person who testifies, declares, deposes, or certifies under penalty of perjury in any of the cases in which the testimony, declarations, depositions, or certification is permitted by law of the State of

California under penalty of perjury and willfully states as true any material matter which he or she knows to be false, is guilty of perjury.

118.1. Every peace officer who files any report with the agency which employs him or her regarding the commission of any crime or any investigation of any crime, if he or she knowingly and intentionally makes any statement regarding any material matter in the report which the officer knows to be false, whether or not the statement is certified or otherwise expressly reported as true, is guilty of filing a false report punishable by imprisonment in the county jail for up to one year, or in the state prison for one, two, or three years. This section shall not apply to the contents of any statement which the peace officer attributes in the report to any other person.

- a) **There is plenty indirect evidence** in the form of Ms. [Daniela], Ms. [Sandra], Ms. [Tatiana], Mr. Bondaug and officer Stewart testifying **that Mr. Bondaug never grabbed Deger's arm** or any other part of his body. In addition to witness testimony, Deger never told another officer on scene or afterwards at the police department that Mr. Bondaug ever touched him. **There was never charge of assault or battery imposed or implied against Mr. Bondaug.** **Deger's report and testimony that Mr. Bondaug grabbed his forearm utterly false.**
- b) **Mr. Bondaug was never placed in the back of Deger's patrol car.** From Ms. [Daniela]'s front porch, to being escorted down the street, and placed into the WRAP restraint, Mr. Bondaug was always in the presence of officers Stewart and Nelson. **Neither Stewart or Nelson documented Mr. Bondaug being placed in the back of Deger's patrol car** and none of them, including Deger, filled out the appropriate paperwork documenting the need to pull Mr. Bondaug from the back of Deger's patrol car if he, in fact, was ever there. **Mr. Bondaug never was in the back of Deger's patrol car, Deger's testimony is a lie.**
- c) **Ms. [Sandra] was never on the front porch and in between Deger and Mr. Bondaug, as Deger testified and wrote in his report.** Ms. [Daniela], Ms. [Sandra], Ms. [Alfaro], Mr. Bondaug testified to this. When Deger was asked how he got Ms. [Sandra] back through the screen door when he began his assault on Mr. Bondaug, **Deger testified that he swept her to his left on somewhere on the porch. Officer Stewart says he never saw Ms. [Sandra] on the porch.** **Ms. [Sandra] was never on the porch, Deger lied.**
- d) **Deger testified and wrote in his report that Mr. Bondaug was intoxicated and slurring his speech, this is a completely false accusation.** Ms. [Daniela], Ms. [Sandra], Ms. [Tatiana], Mr. [Shawn], Mr. [Todd], and Mr. Bondaug testified that **Mr. Bondaug was not intoxicated nor was he slurring his speech.** The EMT personnel on scene, fire-paramedic personnel on scene, nurses and doctors at Valley Medical Center all stated that **Mr. Bondaug was fully oriented** – there was **not one single note from any medical professional that Mr. Bondaug**

was intoxicated. Audio recording of Mr. Bondaug irrefutably demonstrates that he was not intoxicated nor was he slurring his speech.

- *Intoxicated defined: To stupefy or excite by the action of a chemical substance such as alcohol*
 - *Stupefy is the inability to think clearly or be sensitive to the surroundings; daze.*
- Officer Bell openly exchanged conversations of the Marine Corps units they were in and Bell voluntarily, without solicitation, spoke to Mr. Bondaug about his officer Bell's divorce.
- Officer Larsen (Eldridge) openly spoke to Mr. Bondaug about her recent marriage.
- Officer Ellis testified that Mr. Bondaug was cordial and held conversations with her.

Gregory Deger, as a police officer with the City of Santa Clara, has a history of [redacted]. During this incident, 11-12465, on the night of December 2, 2011, during his deposition, and during trial, Deger has now publicly made it known that he is fully capable and willing to lie, completely fabricate incidents, and stare at women and a man who have been upstanding residents in the Cities of Santa Clara and San Jose and tell them that his consistent lies are worth more than their peaceful life in their respective cities. I ask that an independent investigator examine all the facts above in determining that Gregory Deger has consistently lied to his superiors, the City of Santa Clara and members of the community. In making that finding, I demand the termination of capacity as a peace officer with the City of Santa Clara.

As guaranteed by Santa Clara Police Department's policy for responding to citizen Commendation, Inquires or Complaints policy: I expect to receive written notification every 30 days regarding the progress of the investigation all the way through completing a findings report.

/s/ Garrett Bondaug

Garrett Bondaug
[Address Redacted]