

## **DESCRIPTION OF INCIDENT**

*(Attach added sheets; Number pages as needed; Sign bottom of each added page):*

### **INFORMATION REGARDING THIS COMPLAINT**

The San Diego Sheriff's Department under the color of law, has implemented policies and procedures that violate the provisions of California Penal Code Sections 12050 thru Section 12054.

The San Diego Sheriff's Department in their zeal to deny licenses to carry concealed weapons has conspired and devised a scheme which violates California law in areas that appear to be criminal in nature.

### **FACTS OF THIS COMPLAINT**

The undersigned complainant Edward A. Peruta, D.O.B. 01.21.1949, maintains several residences across the United States, including but not limited to a residence in San Diego County at 3151 Driscoll Drive, in the City of San Diego.

The undersigned is aware of the fact that individuals may legally establish and maintain more than one residence but only one domicile.

The California Penal Code Sections that pertain to conceal carry licenses does not have a definition section and simply requires that all applicants be a "RESIDENCE" in the county or city of application.

Residence by definition is a place considered temporary in nature.

The undersigned maintains a domicile in Connecticut, two fixed residences in California and one residence in Florida.

The San Diego residence which is questioned by the Sheriff's Department is in addition to another residence at 8120 Holy Cross Place in the City of Los Angeles, California which is owned exclusively by my wife.

The undersigned currently maintains a mobile residence in the form of a motor home which allows us to establish residency in any location within the United States.

The undersigned is the founder and sole stock holder in two businesses based in Connecticut, (which contrary to statements made by Sheriff's Department employees), does not require local business licenses to operate. One of the two businesses is a News and Information Business which gathers and disseminates information and operates throughout the United States providing raw Breaking News Video, Still Photographs and news tips to various mainstream media outlets.

The undersigned currently possesses a California Driver's license and has a vehicle registered in the state of California.

The undersigned maintains a checking account in Los Angeles and an investment account in San Diego County, California.

My wife and I travel nationwide in our motor home and frequent Campland on the Bay, State and National Parks and military recreational campgrounds throughout California for various periods of time.

The San Diego residence being questioned is in the home of my wife's sister and her husband, and consists of exclusive use of a bedroom, bed, dresser and closet together with personal clothes etc. Since 1988 and currently we travel by air and land, to and from California on a regular basis, and stay at our San Diego residence if necessary. Since 2006 my wife and I have made our residence in a 40" Country Coach motor home which we can park at our Connecticut and Florida real estate.

Because of our residence on Driscoll Drive, we can travel to and from San Diego by air, and travel with nothing more than a small suitcase of toiletries and a single change of clothes, leaving our Connecticut and Florida clothing behind while taking advantage of our complete wardrobes in San Diego.

My wife and I utilize a mail forwarding service in Pensacola, Florida that has forwarded our mail to 3151 Driscoll Drive in San Diego since the end of October 2008.

In the early 1970s, the undersigned had the opportunity to attend and successfully completed a course of instruction and obtained certification as a municipal police officer in the State of Connecticut. As part of the instruction, the undersigned was taught how to read, interpret and apply various provisions of the law.

The undersigned has passed several rigorous and extensive background checks and the scrutiny of several law enforcement agencies to obtain permits to carry pistols and revolvers in the states of Connecticut, Utah and Florida.

Given the fact that I possessed a permit to carry a weapon in Connecticut and had plans to apply for permits in Utah and Florida, I decided to make application for a license to do so in the State of California as a resident of San Diego County.

I am currently certified by the National Rifle Association, and States of Connecticut and California Department of Justice as a firearms instructor.

In anticipation of possessing and carrying a firearm, together with the fact that much of my time is spent in California for extended stays, the undersigned researched the California Penal Code requirements for obtaining a license to carry a concealed weapon in the State of California. Following the research I decided to make application for a license carry concealed and submit a concealed carry course of instruction for approval so that I could instruct individuals who desired to obtain a license to carry concealed in Sand Diego County.

Prior to making application for the license to carry concealed and submitting my safety course for approval, I made it a point to read and familiarize myself with the provisions of the California Penal Code Sections which apply to obtaining a license to carry a concealed weapon and the minimum firearms safety course requirements in California.

After reading the various sections of the California Penal Code and information posted on the San Diego Sheriff's Department's website, I found it necessary to seek clarity because of the differences between the Penal Code provisions and the Published Policies, Procedures and Practices found on the San Diego Sheriff's Department's internet website.

In early November of 2008, I proceeded to the Sheriff's License and Permit Unit where I signed in to the unit sign in log and was permitted to speak to someone. During my initial visit I began to make verbal inquires and ask questions on a variety of firearms issues to determine why the department's policies and provisions of the California penal code differed.

I was told that my understanding of the law was incorrect, and that the process involved two appointments, and proceeded to schedule the first of the two required interviews.

Anticipating a problem and run around, I took a recording device to the first scheduled interview and recorded same.

A recording exists and documents that during the first interview, the woman who initially began conducting the interview questioned me by asking "Who have you talked to about this", and the interview was then transferred to and conducted by a unit supervisor by the name of Donna Burns.

Ms. Burns took notes during the interview and proceeded to inform the undersigned that I was a resident of Los Angeles County, would not be considered a resident of San Diego County, and went on to explain the manner in which residence is determined by the San Diego Sheriff's Department and the documents required to do so.

Ms. Burns then went on to explain her opinion as to why I did not have the required "good cause" for issuance, and made note of her opinion on a department form. I requested and received copies of the two pages Ms. Burns generated during this first interview.

Following the first interview and getting over the initial shock of what I had been told, I proceeded to submit a written list of questions and request a clarification regarding the policies and practices of the San Diego Sheriff's Department. In anticipation of problems, I researched my options and sent a copy to the Citizen's Law Enforcement Review Board together with a request to speak at the December 9<sup>th</sup> 2008 meeting of the board.

On the evening of December 9<sup>th</sup>, I did in fact attend the CLERB and made a brief presentation regarding problems I was facing with the Sheriff's Department. My presences and purpose for being at the CLERB are reflected in the official minutes of the meeting. At the time I appeared, I had not submitted and had no intention of submitting a formal complaint

on the topic presented.

Since attending the CLERB meeting in December of 2008, much has taken place regarding my attempts to obtain information and submit an application for a Conceal Carry license through the San Diego Sheriff's Department, including what I consider negative references to my appearance before the CLERB, together with my questioning the policies and opinions expressed by Sheriff's Department employees and supervisors. The reference which I believe attacks my character due to my appearance before the CLERB is contained and documented in an internal Sheriff's Department memo dated March 7, 2009 which I have provided below.

### **Reference to CLERB taken from the end of a SDSA document dated March 7, 2009:**

It should also be noted that PERUTA attended the Citizens' Law Enforcement Review Board (CLERB) meeting on December 9, 2008, and addressed the Board requesting clarification on the California Penal Code sections 12050 through 12054 pertaining to the Sheriff's Department's denial of his application for a concealed weapon permit (see attached minutes)

### **Complete text of SDSA document dated March 7, 2009**

March 7, 2009

TO: Blanca Pelowitz, Manager (O-41)  
Sheriff's License Division

Millie Faiat, Sheriff's Licensing Specialist (O-41)  
Sheriff's License Division

VIA: Chain of Command

On February 10, 2009, I received the file on Edward Allan PERUTA who submitted an application for a CCW license on February 3, 2009. PERUTA is retired and travels throughout the country in his RV. PERUTA lists numerous reasons on his ccw application for desiring a ccw license. He listed the following:

He and his wife like other individuals who maintain a mobile home/residence often carry large sums of cash, valuables and equipment in the motor home.

He and his wife while traveling in their mobile residence, often find it necessary to stop and spend evenings in extremely remote rural areas of the United States and the State of California where there is no means to contact or summons assistance in the event of a public safety emergency.

He and his wife are fearful of the possibility that they and. Their mobile residence may become The target of criminal acts and violent crime(s) while spending nights in remote areas where in many situations, there are no means to summon public safety personnel.

He is also the founder and sole stockholder of American News and Information Services Inc. and often gathers and disseminates breaking news video and. Still photographs together with timely information as an active member of the news media and legal investigator. As a full *time* member of the media and part time legal investigator, who specializes in breaking news and information he travels throughout the United States and California for business and pleasure. He often finds it necessary to enter high crime areas and location where there is no opportunity or means to summon assistance while performing his assignments.

When I received PERUTA'S application, it shows he was interviewed by Donna BURNS (License Supervisor) on November 17 2008, for the initial phase of the CCW application process. He was advised by BURNS he did not meet the criteria for a CCW license. PERUTA not satisfied with this returned in December 2008 and again in January 2009 to speak with Blanca PELOWITZ (Manager.) who also concurred with the information given to him by her staff

Despite the fact that **PERUTA** was told. He did not meet the criteria for a CCW license **PERUTA insisted this office accept his application**. **PERUTA** was advised that **no monies would be refunded** once his application was accepted.

Page 3 of 9

While reviewing **PERUTA**'s application he did not provide any current documents (i.e. police reports, **TRO**, etc) to substantiate or support his need for a CCW license based on the reasons he listed. The residence address **PERUTA** listed on his application, (3151 Driscoll Drive, San Diego CA 92117, is **owned by his wife's sister and brother-in-law (Gloria and George Henderson)** who **also reside** there. I conducted a search of the County of San Diego's assessor's database as well as the Registrar of Voters system to determine whether **PERUTA** owns property(s) or is registered to vote in San Diego County. The searches produced "no record" results. I also conducted an ARJIS search to determine if there were any reports of threats or violence against **PERUTA** and his family also with no results. **PERUTA** lists his business as American News and Info Services located at, 38 Parish Road in **Rocky Hill, Connecticut 06067**. I conducted search of that business and address and it revealed the property is a single family residence owned by **PERUTA** (Hartford County Assessor #14-01-004.39). Also, listed on his application was a mailing address in Pensacola, Florida. The background investigation revealed **PERUTA** has a single family residence located at, **2036 20<sup>th</sup> Avenue SW in Vero Beach, Florida** 32962 (Indian River County Assessor #3339350000214600007,0) and another one at **8120 Holy Cross Place in Los Angeles** (LA County Assessor #4113-006-005).

On 03/4/09, I called the Finance Department (860-258-2720) in Rocky Hill, CT to verify whether **PERUTA**'S business was still active. I spoke with Kathy who referred me to the Town Clerk's office. Kathy asked me the name of the business and. Told me she wasn't familiar with it. I called the Town Clerk's office (860-258-2705) and spoke with Linda who said a business has to file a trade name with that office and then pay taxes to the Assessor's Dept. **in order to conduct business** American News and Information Services, Inc. filed a trade name in 1997 by Edward **PERUTA**. Linda said a person can file a trade name but it does not necessarily mean they are in business, I asked Linda if this filing was something like a Fictitious Business Name statement and she said "yes" .The only way to verify whether they are in business is to check with the Assessor's office and she transferred me. I spoke with Cassandra (Assessor's Dept.) who checked the business name, address and owner information and could not find anything in their system. Cassandra said if the business was paying taxable personal property for the business it would have shown on their database. **Based on our conversation PERUTA does not have a valid business license in Rocky Hill, CT at this time**. However the business is filed as an active corporation in the State of Connecticut and not California.

On 03/04/09, I called Jocelyn **PEREZ** (Los Angeles's Sheriffs Dept.) who processes **CCW** licensee in Los Angeles County. Since **PERUTA** has a residence in Los Angeles I wanted to find out whether he had applied to their department as well. **PEREZ** left me a message stating' she checked their files and have no record of **PERUTA** applying with them.

On **03/04/09** I called Campland on the Bay because **PERUTA** stated, on the initial application he submitted, **he resides full time at this facility**, I spoke with **Kim** (Reservations Office) who said they offer long term stays which is 30 days or more up to a maximum of 270 days in a calendar year. Because they are a **transient** park, they have the campers vacate every 90 days for at least 24 hours then they can return. I asked whether **PERUTA** was a camper at their park and she stated he reserved the spot on November 15, 2008 until April 15, 2009. **Kim**, checked her records and stated he was also at the campgrounds in February 2007 to April 2007 but showed nothing for 2006.

On **03/04/09**, I received information regarding a telephone call received from **SDPD** Officer **LIMON** regarding an incident at their front counter involving **PERUTA**. I called the phone number provided (619-531-2231) and spoke with Officer **HARVEY**. **HARVEY** stated his partner Officer **LIMON** was the one who had dealt with **PERUTA** but was out due to a family emergency. **HARVEY** stated he would be speaking to **LIMON** later in the afternoon and **would have him send me a narrative of the incident via Interoffice (see statement by LIMON)**. **It should also be noted that PERUTA attended the Citizens' Law Enforcement Review Board (CLERB) meeting on December 9, 2008, and addressed the Board requesting clarification on the California Penal Code sections 12050 through 12054 pertaining to the Sheriffs Department's denial of his application for a concealed weapon permit (see attached minutes)**

Although **PERUTA** travels extensively throughout the United States and has property in Florida and Los Angeles) California, **based on the information revealed** during the background investigation it appears **PERUTA**'S **primary residence** and business is in Rocky Hill, Connecticut. **PERUTA** is also registered as a voter there.

In reviewing PERUTA'S reasons for the CCW license it appears **his main reason** in applying for a CCW is to have it when he's traveling throughout the country in his RV.

On **03/09/09**, PERUTA showed, up at the license counter to submit **HIS 8 HOUR BASIC SAFETY COURSE**. He also provided a photo of a Theft Warning notice that he wanted to submit as proof of his need for a COW license. Since the notice is posted for the Rincon Beach Campers in **Ventura County** (not San Diego County) **this document is not sufficient proof**.

One of the requirements an applicant must meet when applying for a COW license is to show "good cause." PERUTA listed **numerous reasons** for a CCW license, but did not provide any **sufficient document(s)** that would support his need. Although he was advised by licensing staff he did not meet the criteria for a ccw license, **he insisted on submitting the CCW application for processing**.

The **"burden of proof"** lies solely on the applicant to **provide the necessary documents** to substantiate his reason,(s) for a CCW license. It is his responsibility to make sure these documents are submitted to show **"good cause"** and the "need" for a CCW license. PERUTA **failed to provide any of these** upon submission of his application. I could not locate any report(s) of past/current threats against **PERUTA** or his family.

Therefore, based on the **information revealed during the background investigation** and the fact **that PERUTA has failed to provide the necessary documents to substantiate and/or support his need** for a CCW license, **this office recommends denial of his CCW application for "good cause"**.

Submitted By,  
Millie Faiai, Sheriffs Licensing Specialist  
Sheriffs License Division  
Attachments

## **Complete text of SDSL document dated March 16, 2009**

March 16, 2009

To: **A. Skoglund, Commander**  
Law Enforcement Operations – Area 1

From: **Blanca Pelowitz, Manager**  
License Division

Subject: Edward Peruta – **CCW GP25466**

The CCW application background investigation for CCW Peruta has been completed. The results of the investigation failed to substantiate good cause for the issuance of the license. In addition, the results of the investigation reflect **doubt and uncertainty as to his "permanent" residency in San Diego County** and reveal **certain negative character issues**.

On November 17, 2008, Edward Peruta initially came in to request a CCW license and was interviewed by **Donna Burns, Licensing Supervisor**. Mr. Peruta was **very vague** with his answers and was **mainly interested on what the Departments policy for issuance and residency requirements were**. On December 4, 2008 Peruta came back to the building to deliver to the legal department what he called **FORMAL INQUIRY AND REQUEST FOR CLARIFICATION**" related to CCW P&P. Peruta finally submitted the application February 3, 2009 after trying to **challenge staff and department policy**. Peruta **seems to be seeking and preparing to challenge the department** if he is denied. **He has made that point clear to**

staff, and other Law Enforcement agencies throughout the County (SDPD & CLERB). See Millie's report.

Page 5 of 9

The primary reasons Peruta is requesting a CCW vary from ... he is a resident of the County, he travels in his motor home, and/or enters high crime areas as part of his media and legal investigative activities. What ever business he conducts in this State if any, is not currently registered anywhere,

The information gathered by Millie Paiai, Licensing Specialist outlines in detail the concerns and issues with Mr. Peruta and the fact he does not meet the 3 main issuing criteria as prescribed in §12050 et seq. Mr. Peruta has made it clear even to staff that he is one to challenge and seems to be making it a goal to have a ccw issued in every state he travels.

Therefore, based on the results of the investigation and the lack of credibility as well as lack of satisfactory supporting documentation in meeting the main criteria, I recommend denial.

#### **ALLEGED VOLATIONS OF THE CALIFORNIA PENAL CODE BY "TWO OR MORE PERSONS" CPC Sec. 484**

**California Penal Code Section 12050** clearly establishes the minimum requirements to apply for and receive a license to carry concealed weapon(s) in the state of California, one of which is the requirement to be a "RESIDENT" of the geographical county or City where the application is submitted.

**California Penal Code Section 12054** clearly states establishes and LIMITS the amount of fees that can be collected to 20% with any application for a concealed weapons permit application, and further mandates that the remaining 80% of the fee can only be collected following the issuance of a concealed weapon(s) license.

California Penal Code Section 12054.

(a) Each applicant for a new license or for the renewal of a license shall pay at the time of filing his or her application a fee determined by the Department of Justice not to exceed the application processing costs of the Department of Justice for the direct costs of furnishing the report required by Section 12052. After the department establishes fees sufficient to reimburse the department for processing costs, fees charged shall increase at a rate not to exceed the legislatively approved annual cost-of-living adjustments for the department's budget. The officer receiving the application and the fee shall transmit the fee, with the fingerprints if required, to the Department of Justice. The licensing authority of any city, city and county, or county may charge an additional fee in an amount equal to the actual costs for processing the application for a new license, excluding fingerprint and training costs, but in no case to exceed one hundred dollars (\$100), and shall transmit the additional fee, if any, to the city, city and county, or county treasury. The first 20 percent of this additional local fee may be collected upon filing of the initial application. The balance of the fee shall be collected only upon issuance of the license.

#### **Note from SDSA document:**

Despite the fact that **PERUTA** was told he did not meet the criteria for a CCW license PERUTA insisted this office accept his application. PERUTA was advised that no monies would be refunded once his application was accepted.

**California Penal Code Section 484**

(a) Every person who shall feloniously steal, **take**, carry, lead, or drive away the personal property of another, or who shall fraudulently appropriate property which has been entrusted to him or her, **or who shall knowingly and designedly, by any false or fraudulent representation or pretense, defraud any other person of money,**

**California Penal Code Section 182**

(a) If **two or more persons** conspire:

- (1) To commit any crime.
- (2) Falsely and maliciously to indict another for any crime, or to procure another to be charged or arrested for any crime.
- (3) Falsely to move or maintain any suit, action, or proceeding.
- (4) To **cheat and defraud any person of any** property, by any means which are in themselves criminal, **or to obtain money** or property **by false pretenses** or by false promises **with fraudulent intent not to perform those promises.**
- (5) To **commit any act injurious to** the public health, **to public morals,** or **to pervert or obstruct justice,** or **the due administration of the laws.**
- (6) To commit any crime against the person of the President or Vice President of the United States, the Governor of any state or territory, any United States justice or judge, or the secretary of any of the executive departments of the United States.

They are punishable as follows:

When they conspire to commit any crime against the person of any official specified in paragraph (6), they are guilty of a felony and are punishable by imprisonment in the state prison for five, seven, or nine years.

When they conspire to commit any other felony, they shall be punishable in the same manner and to the same extent as is provided for the punishment of that felony. If the felony is one for which different punishments are prescribed for different degrees, the jury or court which finds the defendant guilty thereof shall determine the degree of the felony the defendant conspired to commit. If the degree is not so determined, the punishment for conspiracy to commit the felony shall be that prescribed for the lesser degree, except in the case of conspiracy to commit murder, in which case the punishment shall be that prescribed for murder in the first degree.

If the felony is conspiracy to commit two or more felonies which have different punishments and the commission of those felonies constitute but one offense of conspiracy, the penalty shall be that prescribed for the felony which has the greater maximum term.

**When they conspire to do an act described in paragraph (4), they shall be punishable by imprisonment in the state prison, or by imprisonment in the county jail for not more than one year, or by a fine not exceeding ten thousand dollars (\$10,000), or by both that imprisonment and fine.**

**When they conspire to do any of the other acts described in this section, they shall be punishable by imprisonment in the county jail for not more than one year, or in the state prison, or by a fine not exceeding ten thousand dollars (\$10,000), or by both that imprisonment and fine.** When they receive a felony conviction for conspiring to commit identity theft, as defined in Section 530.5, the court may impose a fine of up to twenty-five thousand dollars (\$25,000).

All cases of conspiracy may be prosecuted and tried in the superior court of any county in which **any overt act tending to effect the conspiracy shall be done.**

(b) Upon a trial for conspiracy, in a case where **an overt act is necessary to constitute the offense,** the defendant cannot be convicted unless one or more overt acts are **expressly alleged in the indictment or information,** nor unless one of the acts alleged is proved; but other overt acts not alleged may be given in evidence.

## COMPLAINT AND REQUEST FOR INVESTIGATION

The undersigned Edward Peruta requests that the facts and circumstances of misconduct and possible violations of the law as alleged in this complaint be investigated and addressed by the San Diego Citizen's Law Enforcement Review Board.

Individuals listed in this complaint are employed by the San Diego Sheriff's Department and involved in possible violations of sections 484 and 182 of the California Penal Code together with conduct which is contrary to public policy and law.

By way of this complaint, it is alleged that employees of the San Diego Sheriff's Department, acting together and individually, under the color of law, have implemented a scheme to violate and/or ignore the legislative mandates regarding the process by which California residents make applications to obtain a license to carry a concealed weapon licenses and seek approval of courses in firearms safety.

Specifically, the named individuals employed by the San Diego Sheriff's Department have knowingly and intentionally implemented and carried out, various policies, procedures and practices which are in direct conflict with California law and in doing so:

Have conspired to take fees prohibited by law at the time an application for a conceal carry license is made.

Specifically, the named individuals employed by the San Diego Sheriff's Department have knowingly and intentionally implemented and carried out, various policies, procedures and practices which are in direct conflict with California law in doing so:

Have conspired to require individuals to complete additional forms for a license, and to provide information which is unnecessary to complete the standard application form which is unnecessary to clarify or interpret information provided by the applicant on the standard application form.

Specifically, the named individuals employed by the San Diego Sheriff's Department have knowingly and intentionally implemented and carried out various policies, procedures and practices which thwart and pervert the standard application process in direct conflict with California law and in doing so have:

Conspired to consistently require applicants to complete the investigators portion of the standard application which is in direct conflict with the instructions contained on same.

Conspired to force applicants for conceal carry licenses to expend money in addition to the other than lawful means, from unsuspecting residents of San Diego County.

Conspired to mandate that applicants to submit 3 letters of reference from a specific geographical area.

Conspired together to mandate and require each applicant to take and pass a second additional written test after successful completion of the approved course of instruction which includes a mandated written test.

Conspired together to mandate and require each applicant to qualify and demonstrate proficiency a second time after each applicant's successful completion of and approved course of instruction which includes live fire familiarization with the weapon to be carried by the discharge/firing of 100 or 50 rounds of ammunition.

Specific employees have knowingly and intentionally acted individually and together in an unprofessional manner which has resulted in:

Justice and the due administration of the laws of California being obstructed and perverted by their actions.

Specific employees have knowingly and intentionally memorialized in written public records, untrue misleading facts which:

Have been circulated to other state and/or federal agencies which may impact the undersigned in a negative way.

This matter was personally conveyed verbally to Undersheriff James Cooke of the San Diego Sheriff's Department at a meeting in his office following a hearing held on the denial of my application for a CCW permit.

A document was then received which required me to APPLY for a refund of the improperly collected fees, which I refused to execute and submit on the belief that individuals who have had money taken illegally and criminally should not have to make application for refunds from those who committed the violation(s) of the California Penal Code.

**A recent check of the policies and procedures on the internet further confirms that this criminal activity under provisions of the California Penal Code has continued and is currently continuing on the date of this complaint.**

The following 4 individuals listed in this complaint, (possibly with others that may not be known to the undersigned), have in their zeal to prevent individuals from obtaining conceal carry licenses, acted individually and together in a scheme which must be investigated, exposed and stopped.

**THE INDIVIDUALS WHO ARE NAMED IN AND THE SUBJECT OF THIS COMPLAINT ARE:**

**Undersheriff James Cooke**

**Sanford A.Toven, Legal Advisor to the San Diego Sheriff's Department**

**A. Skoglund, Commander - Law Enforcement Operations – Area 1**

**Blanca Pelowitz, Manager License Division**

**Donna BURNS (License Supervisor)**

**Millie Faiai, Sheriffs Licensing Specialist (O-41)**

**Unknown John and Jane Doe participants in the named individuals upper chain of command**

**Unknown members of the Sheriff's Department legal staff**

Based on the information supplied in this complaint and other information and evidence available, I request a formal investigation into the irregularities and activities of the above listed 4 members of the San Diego County Sheriff's Department together with any other public employees of the San Diego Sheriff's Department who may be involved in the perverting and obstructing the due administration of the laws of California.

I further request that the CLERB determine the amounts of application fees that may have been collected and/or kept in violation of California Penal Code Section 12054, and order the return of same to any members of the public who were required to pay excessive and or prohibited fees and costs under FALSE pretenses or FALSE REPRESENTATIONS made by one or more members of the San Diego Sheriff's Department.

Respectfully Submitted,

**Edward A. Peruta** - verified w/right thumb print  
3151 Driscoll Drive & Space I-23 Campland on the Bay  
San Diego, CA 92117  
860-978-5455 or edperuta@amcable.tv

Subscribed and sworn to before me by \_\_\_\_\_ this 19th day of November 2009 at

\_\_\_\_\_ , \_\_\_\_\_.