Rodriguez (Esquivel), Sara E.

Subject: FW: People v. V1 [redacted]

From: Victor Rodriguez <VRodriguez@da.lacounty.gov>
Sent: Friday, February 25, 2022 1:41 PM
To: Reyes, Mark A. <MAReyes@lasd.org>
Subject: FW: People v. V1 [redacted]

From: Iliana Alvarez <ialvarez@da.lacounty.gov>
Sent: Wednesday, February 23, 2022 10:36 AM
To: Victor Rodriguez <VRodriguez@da.lacounty.gov>
Subject: FW: People v. V1 [redacted]

I have the screenshots and I'm reading through them now.

Let's talk about my response.

From: Levon Kyurkchyan <levon@ladefenseteam.com>
Sent: Tuesday, February 22, 2022 6:07 PM
To: Iliana Alvarez <ialvarez@da.lacounty.gov>
Subject: People v. V1 [redacted]

Dear Ms. Alvarez,

Thank you for your time at our video meeting on this matter last week. I recently received an evidence.com link from Mr. Sanchez but all the videos downloaded were the same ones provided in the past, there was nothing new so I'm not sure if there are additional videos or not.

Nevertheless I've had a chance to speak with my client and the officer's conduct is much, much worse than I was purview to when we spoke. I am going to attach all the text messages for your review. What's happened is disturbing and I'm asking for a dismissal.

As soon as my client told me about these text messages I advised her that she is not obligated to speak with or meet with the officer and to stop responding so she just stopped responding at that time but I didn't know how bad it was until now.

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Here is what transpired after my client's arrest. Officer Cano met with her a total of 3 times and his advances were escalating. He made suggestive and sexual advances towards her, asked for "pictures" (we know what that means) and used his position to manipulate my client into going out with him and "getting together". Luckily he was unsuccessful.

He texted her directly the next day after her arrest about returning her earbuds and when she asked when to go to the station he deliberately met with her at a parking lot so they could be alone together. My client felt like she had no choice but to communicate and go along with his requests until things became extremely uncomfortable for her and that's when she mentioned this to me. At the initial meeting he gave her the earpods they spoke for a few minutes and he got a call so he had to leave.

Second meeting happened when he texted her asking where she was and went to the restaurant to meet with her. My client had 3 of her friends with her, they all went outside to meet with Officer Cano and were present when they met, they were present when he gave her a hug and when he told her that he can make this case go away, implying that is, if she would go out with him. He said: "believe me I'll try my best to get Chen not to show up to court" when asking to go out with her. I haven't reached out to her friends but I'm told they will corroborate what she has told me.

the 3rd meeting was when he again asked [V1] where she was and went to see her at her friend's house, my client went outside and they sat in the police car talking, he ran her information in the cars computer, looked over her records and mentioned some issues he was seeing about her being uncooperative [V1] doesn't know what that was about) but then asked her to go out with him again, my client said no, he reached over and touched her face and told her he wants to be with her but given the extreme circumstances my client felt she had to leave and did so as things were getting extremely uncomfortable for her. Since his behavior was escalating, that's when she decided to mention their contact to me. At which point I didn't know that much had happened but told her to stop answering his texts.

When my client stopped responding he called her multiple times and texted her as well but then eventually stopped attempting to contact her. So here we are. Please see attached screenshots, I don't believe they are in exact order but you can see what I'm talking about.

If there is outstanding discovery please let me know, otherwise, I look forward to hearing from you about your thoughts in this matter. Please see attached.

Respectfully,

--
Levon Kyurkchyan
Attorney at Law

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