

1 **IN RE THE MATTERS OF MELANIE CATANIO AND DAVID CANEPA**

2 **DECLARATION OF JUDE CHABOT**

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4 I, Jude Chabot, make this declaration from personal knowledge, except as to those facts that are
5 based upon information and belief, and those facts I believe to be true. I am at least eighteen years of
6 age, and if called as a witness, I can and will testify competently to the following:

- 7 1. I was employed by the Roseville Police Department as a sworn officer in 2017.
- 8 2. My ex-wife Andrea had previously been convicted of multiple felonies, including crimes against
9 our children, and I had a valid restraining order against her at that time.
- 10 3. I continue to have a lifelong restraining order against my ex-wife, which can be validated
11 through the Placer County Superior Court.
- 12 4. I was suffering from psychological trauma in the aftermath of an on-duty shooting in August of
13 2017 when my ex-wife was released from prison on parole and violated the restraining order I
14 had against her.
- 15 5. Upon learning that my ex-wife was out of prison and attempting to make contact with me, I
16 reported her to the local law enforcement authority, the Folsom Police Department in or about
17 August of 2017.
- 18 6. Officer Melanie Catanio of the Folsom Police Department (“Catanio”) was the responding
19 officer and conducted the “investigation”.
- 20 7. Despite the fact that I was the reporting party and informed Catanio that I had a valid restraining
21 order against my ex-wife, Catanio manipulated the evidence and “facts” in her police report to
22 falsely depict me as the aggressor.
- 23 8. By way of example and not limitation, my ex-wife accused me of initiating contact by calling her
24 multiple times; Catanio asked whether I had attempted to contact her, and I promptly provided
25 my cell phone and all of its data to Catanio as exculpatory evidence to demonstrate that I had not
26 sent any messages or made any calls to my ex-wife.
- 27 9. I further provided an alibi to Catanio for the time the supposed calls were made to my ex-wife,
28 which was that I had attended a concert in Wheatland with a friend Josh Smith who is a sworn
officer for Sacramento Police Department; I gave Catanio his name and contact information so

- 1 that she could confirm with the witness that I was not on my cell phone that night.
- 2 10. My Verizon wireless records were also furnished to Catanio to demonstrate that my cell phone
- 3 did not ping near any towers where my ex-wife claimed to be on the night she was supposedly
- 4 contacted by me.
- 5 11. I later learned that Catanio did not identify any of the exculpatory evidence I had provided to her
- 6 regarding my cell phone data and eyewitness contact information in her police report.
- 7 12. Catanio intentionally destroyed the exculpatory evidence I furnished to her and omitted my alibi
- 8 and the evidence related to my cell phone data and eyewitness statements from her police report
- 9 to manipulate and selectively narrate the “facts”.
- 10 13. Through the course of my dealings with Catanio, she openly exhibited contempt towards me and
- 11 demonstrated a personal bias and one-sidedness in her investigation which precluded her from
- 12 assessing the situation with any semblance of neutrality.
- 13 14. Catanio next initiated a stalking case against me related to my ex-wife without probable cause or
- 14 evidence that I had committed any crime.
- 15 15. Catanio then recommended to Detective Nezick of the Folsom Police Department that I be
- 16 investigated for stalking, and omitted key evidence from her report to the Detective, which
- 17 ultimately did not result in any charges being filed against me.
- 18 16. Catanio’s untruthful police report resulted in a protracted family law dispute with my ex-wife
- 19 which required me to spend hundreds of thousands of dollars in legal fees to ultimately have the
- 20 court award sole custody to me, which never would have occurred but-for Catanio’s misconduct.
- 21 17. Catanio’s destruction of evidence and manipulation of the investigation resulted in newspaper
- 22 articles about me which were untrue and related to a crime I have never been convicted of, which
- 23 further exacerbated the trauma I was suffering at the time and caused serious reputational harm
- 24 to my career as a police officer.
- 25 18. During my family law case, Officer Josh Smith testified under oath that Catanio never contacted
- 26 him to verify my alibi nor include his witness statement in her report about me.
- 27 19. Josh Smith currently serves as a major crimes detective at Sacramento Police Department and
- 28 has knowledge of the inadequacy and impropriety of Catanio’s investigation related to me and

1 my ex-wife.

2 20. Although I eventually prevailed in court and received a medical retirement, I was so traumatized
3 by Catanio's manipulated investigation and the reputational harm she caused to me that I
4 relocated to Texas in 2019 to start anew.

5 21. In or around 2018 or 2019, I visited the Folsom Police Headquarters with my parents to file a
6 complaint against Catanio before moving to Texas.

7 22. I spent a considerable amount of time at the Folsom Police Department describing Catanio's
8 misconduct orally and in writing, including how Internal Affairs could verify the following
9 claims I made against her:

- 10 • Destruction/withholding of exculpatory evidence (my Verizon cell phone records)
- 11 • Omitting relevant and credible witness testimony (Catanio never contacted the
12 eyewitness Officer Josh Smith who was with me the entire night during the concert in
13 Wheatland when my ex-wife was supposedly contacted by me)
- 14 • Failure to investigate/personal bias (I explained Catanio's one-sidedness, her attempts to
15 wrongly vilify and criminalize me)
- 16 • Lying/witness tainting (related to untrue statements Catanio made and her efforts to
17 influence testimony/evidence)
- 18 • Perjury (related to her testimony in my family law case)
- 19 • Conduct unbecoming of an officer (for her open hostility towards me and botching the
20 investigation through gross negligence)

21 23. To the best of my recollection, the Caucasian male officer whom my parents and I spoke to at the
22 Folsom Police Headquarters was named Canepa.

23 24. In or about May of 2024, I was contacted by attorney Mary Anne Martin, who furnished me with
24 transcripts of a *Pitchess* hearing dated July 7, 2021 in the People v. Patricia Lane case
25 (Sacramento Superior Court Case #19FE010439; App. No. C094996) wherein Folsom Police
26 Officer David Canepa testified regarding, among other things, the complaint I made against
27 Catanio for her 2017 misconduct, including the following excerpt at p. 88-89 thereof (emphasis
28 added):

1 So somebody was assigned to investigate in 2019 to investigate an incident that occurred
2 in 2017?

3 A That's correct.

4 Q So this complaint, I've just now completed reading it. It's a fairly thorough report, even
5 involving also a transcript of testimony by Officer Catanio. In March of 2019 Folsom
6 received a complaint from a person by the name of Jude Chabot, C-h-a-b-o-t, alleging
7 an improper investigation and follow-up on a restraining-order violation that occurred
8 on August 19 of 2017 by Officer Catanio and another detective, a Detective Davis. The
9 suspect was Chabot's ex-wife, Andrea.

10 "In summary, in August of 2017 there was a valid restraining order by Chabot against
11 Andrea. Chabot indicated he walked into the Folsom Lifetime Fitness. He went upstairs
12 and saw Andrea on a treadmill. He stated Andrea immediately got off the treadmill and
13 went downstairs to the front door. He stated that she lingered there for 15 to 20 minutes
14 before she left with another male. Chabot then contacted the police department to file a
15 crime report for this alleged violation of the restraining order. In his complaint he
16 alleged that Officer Catanio and Detective Davis conducted an inadequate investigation
17 that ultimately had adverse effects on his life."

18 So there was an investigation into that. Ultimately internal affairs concluded that the
19 investigation was proper, and that Officer Catanio did nothing wrong. I don't think this is
20 related in any way to the areas -- there is nothing alleging dishonesty here or fabrication or
21 destruction of evidence or failing to properly book evidence, so based on that I don't think
22 any of this is covered in any way by Attorney Ferrentino's request for this information, so I
23 will not be turning over any information from this. However, I will, as Ms. Ferrentino has
24 requested, and as the appellate courts are becoming more and more adamant about, is that
25 they want trial courts to make a copy or a good record of everything so that they can review
26 it properly. I made a good record of the file that the chief keeps in his office. I made a page-
27 by-page record of that. However, this is too lengthy to make a page-by-page record, so what
28 I am going to do is, I am going to have my clerk make a copy, unless you have a second copy
for me, or unless I can have this copy, and then I will just have it sealed by the court. It will
never be opened unless there is a request by the Third District Court of Appeal to open it,
and at that time they can look at what I looked at to make their own assessment.

25. The transcript of the *Pitchess* hearing in the People v Patricia Lane case grossly mischaracterizes
and severely understates the seriousness of the complaint I filed against Catanio with the Folsom
Police Department in approximately 2018 or 2019.

26. Based on information and belief, in July of 2021 Canepa knew or had reason to know that my
complaint against Catanio for her 2017 misconduct specifically involved allegations pertaining
to Catanio's dishonesty, history of destroying and withholding exculpatory evidence, and
personal bias *in addition to* her failure to properly investigate. In other words, Canepa knew that
failure to investigate was the *least serious* of many instances of misconduct that I reported to
Folsom Police regarding Catanio.

27. Based upon the transcript of the July 7, 2021 *Pitchess* hearing in the People v. Lane case, I

1 believe the complaint I filed against Catanio with the Folsom Police Department regarding her
2 2017 conduct was directly relevant to Catanio's history of destroying evidence, manipulating
3 witness testimony, and falsifying police reports.

4 28. Upon information and belief, Canepa remains a sworn police officer employed by the Folsom
5 Police Department and has since been promoted to Lieutenant.

6 29. During the course of my dealings with Catanio, I learned that Catanio does not have a propensity
7 for truthfulness; I do not regard Catanio as an honest police officer.

8 30. I am aware that this declaration may be relied upon in connection with legal proceeding(s) and/or
9 investigation(s) regarding Catanio and/or Canepa's propensity for truthfulness and fitness for
10 duty as a sworn officer(s), and I consent to such use.

11 31. I declare under penalty of perjury under the laws of the State of California that the foregoing is
12 true and correct.

13 Executed this 14th day of May, 2024 at Dallas, Texas.

14 By: 
15 JUDE CHABOT
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