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 Jeff Dirkse, Sheriff-Coroner

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 (209) 525-7216

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250 E. Hackett Rd  
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**Sheriff's Detention Center**

200 E. Hackett Rd  
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**Coroner's Office**

921 Oakdale Rd  
 Modesto, CA 95355  
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**Civil Division**

801 11th St, Ste 2200  
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**Investigations**

250 E. Hackett Rd  
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**Records**

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**Alternative Work Program/REACT**

194 E. Hackett Rd  
 Modesto, CA 95358  
 (209) 491-8771

**Patterson Police Services**

33 S. Del Puerto Ave  
 Patterson, CA 95363  
 (209) 892-5071

**Riverbank Police Services**

6727 Third St  
 Riverbank, CA 95367  
 (209) 869-7162

**Hughson Police Services**

7018 Pine St/PO Box 9  
 Hughson, CA 95326  
 (209) 883-4052

**Waterford Police Services**

115 E St  
 Waterford, CA 95386  
 (209) 874-2349

**Training Center**

3805 Cornucopia Way  
 Modesto, CA 95358  
 (209) 567-4408

September 22, 2025

Honorable Sonny Sandhu, Presiding Judge  
 Superior Court of California, County of Stanislaus  
 P.O. Box 3488  
 Modesto, CA 95353

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SEP 25 2025

BY: \_\_\_\_\_

**RE:** Response to SCCGJ Case #25-23GJ

Dear Judge Sandhu:

The following is our response to SCCGJ, Case #25-23GJ, dated June 25, 2025.

**F1.** The 1999 SR911 JPA is outdated and lacks adequate content, detail, definitions, and policy necessitating major revisions with input from City of Modesto, Stanislaus County, SR911, plus stakeholders in the law enforcement, fire, and medical first responder community.

**Response:** The Sheriff's Office agrees with this finding. The original Stanislaus Regional 911 (SR911) JPA as well as the amendments still lack content, details, definitions, and policies and should be reviewed and modified. Some of the information lacking in the written JPA is as follows:

1. Missing Signature Page and Participating Agencies

One of the most fundamental issues in the JPA is the absence of a participant's signature page. Without clear documentation of who is officially part of the agreement, there is no accountability or formal recognition of the parties involved; specifically, the duties, responsibilities and obligations of both SR911 and the various law and fire agencies. This lack of clarity means that agencies are not held to the terms of the JPA, creating confusion about who is bound by its provisions. The absence of formalized agreements between participating agencies undermines the legitimacy of the JPA. A signature page is the basic contract that indicates commitment from all parties.

2. Undefined Roles and Responsibilities of Advisory Boards or Committees

The JPA also fails to outline specific roles or responsibilities for its policy board, advisory boards or committees. Without these guidelines, there is no clear leadership structure or decision-making authority and leads to confusion

over who has the power to make critical decisions, causing delays, disputes, and miscommunication.

### 3. Absence of Service Level Agreements (SLAs)

Another major oversight is the absence of Service Level Agreements. These agreements are essential for setting clear expectations about the quality and timeliness of services. There is no benchmark to assess whether dispatch services are meeting the needs of the agencies involved, leaving performance issues unresolved and disputed. This also puts dispatchers in a tough position of not understanding what is expected from the various agencies.

### 4. No Technology Committee:

A dedicated technology committee was lost from the JPA. Dispatch services are heavily reliant on technology—whether it's radio systems, software, or data-sharing platforms. Without a specialized committee to oversee these technologies, agencies struggle to integrate their systems, leading to technical failures or glitches, incompatible software, delays in service delivery and, ultimately, leading us to where we are today with a Computer Aided Dispatch (CAD) selection. The selection of a CAD did not go through the proper Request for Proposal (RFP), did not meet the needs of the Sheriff's Office and may not integrate with our current Records Management System (RMS) or future RMS. The current CAD purchased in 2012 was supposed to communicate CAD to CAD and the issue was never resolved. We still do not have confirmation that the recently purchased CAD, Central Square, can communicate CAD to CAD. Central Square was purchased by the City of Modesto and not the JPA.

The absence of well-defined roles for security and oversight within the JPA also means that no one is directly accountable for safeguarding California Law Enforcement Telecommunications System (CLETS) data once the data goes into the CAD system. Once the CLETS data goes into the CAD system, the Sheriff's Office has no ability to audit CAD. That is the responsibility of the CAD Administrator employed by SR911. Different agencies have varying levels of responsibility and control over the data, and without clear lines of authority, the necessary checks and balances to protect this sensitive information are simply not in place. Unauthorized access to criminal records, vehicle information, and warrants not only jeopardize ongoing investigations but poses a direct threat to officer safety. Worse yet, it undermines public trust in the agency's ability to protect sensitive data. This is how critical it is to establish strong, clear protocols and oversight when multiple agencies are involved in shared services like dispatch and data access.

### 5. Lack of Clear Withdrawal Guidelines:

The JPA failed to include clear withdrawal guidelines. Without a formal process for agencies to exit the agreement, leaving the agreement open to unexpected disruptions, where agencies could pull out leaving the remaining participants in limbo. This first happened in 2015 when the City of Newman left the JPA, and the CEO acknowledged there were no contracts in place. Then in October 2021 the City of Modesto submitted a letter with their intention to pull out of the JPA but continues to extend their participation one year at a time with no long-term commitment or reason for wanting to stay.

This led the Sheriff to take decisive action to prevent delays in looking for a CAD, RMS, JMS solution based on the current failing CAD, and the County Chief Executive and Information Technology Center driven Deltawrx RMS/JMS consulting report recommending a fully integrated system. The Sheriff's Office has been out of compliance with transitioning from Uniform Crime Reporting (UCR) to the National Incident-Based Reporting System (NIBRS) because of our failing RMS since January 1, 2021. The County entered into a design and development agreement with Oracle to create a single platform solution for CAD, RMS, and JMS that included all the participating agencies at SR911 except Modesto Police Department, because they intended to pull out of the JPA. The Oracle partnership comes with significant cost savings, revolutionizes law enforcement technology and brings us into compliance with NIBRS. Our current ICJIS RMS has over 17 million criminal records, evidence records, and police reports. The ICJIS RMS database has not been supported for approximately three years because the current database version is so outdated. The Sheriff has both a statutory and fiduciary duty to safeguard criminal records from unauthorized access, misuse, disclosure, or loss.

#### 6. No Cost-Sharing Formula:

One of the most significant issues in the JPA is the absence of a clear and reasonable cost-sharing formula. The original agreement did not define how the costs for dispatch services would be divided among participating agencies. This lack of financial transparency has led to disputes over funding, with some agencies feeling they are paying MORE than their fair share, while others contributed less than expected. There were two studies of the JPA conducted by Matrix Consulting Group in 2015 and 2020, costing approximately \$100,000 dollars that clearly outlined what the cost sharing formula should be, but the County CEO and Modesto City Manager came up with their own cost sharing formula. Again, leaving agencies feeling like they are paying more than their fair share. Recently, the City of Hughson costs went up 50% in the Fiscal Year 2026 Budget without any increased level of service from SR911 and no communication regarding the increase before the budget item went to Consolidated Emergency Dispatch Agency Commission (CEDAC). The Matrix studies cost the JPA partners \$100,000 dollars and were never presented to the

CEDAC or the County's Board of Supervisors and none of the recommendations have been considered or discussed to this day.

7. Unclear Handling of Records and Confidentiality:

Finally, the JPA didn't establish clear guidelines on how records and confidentiality would be managed to include Public Records Act Requests. In a law enforcement context, where sensitive personal and criminal data is involved, this omission is especially problematic. The lack of policies leads to concerns about the potential mishandling or unauthorized sharing of confidential information, undermining trust among participating agencies.

8. Non-Criminal Justice Law Enforcement Employees – Dispatchers:

In the current JPA agreement, the dispatchers are **non-criminal justice** law enforcement employees, this means they are county employees giving them limited access to California Law Enforcement Telecommunications System Data (CLETS). This computer network gives law enforcement departments access to national databases maintained by the Federal Bureau of Investigation (FBI) and California Department of Motor Vehicles (DMV), among others. This restriction is intended to protect privacy and ensure compliance with regulations, but it significantly impedes the effectiveness of law enforcement dispatch services at SR911.

When officers respond to calls without having all the available information, it creates significant risks to their safety. Limited access to CLETS data increases the chances that officers will not be fully prepared for what they might encounter, compromising their safety and the safety of the public.

By addressing this issue and enabling law enforcement dispatchers to access critical data, we can improve response times, coordination, and ultimately, the safety of officers and the public. As an example, our current dispatchers do not have access to the Sheriff's RMS to obtain critical information from prior reports. SR911 dispatchers cannot look up an address to see if someone is on probation or parole. They also don't have the ability to see or send statewide teletype messages for missing persons, be on the lookout information or other critical officer safety information. Dispatchers cannot look up driver's license photos to confirm suspects officers are in contact with and they cannot confirm the registration status of sex offenders. SR911 must call the Sheriff's Office Records Division to confirm this information along with out-of-county warrants.

- R1a.** The SCCGJ recommends that the County Board of Supervisors and Modesto City Council implement the necessary actions to complete the following

recommendation: The SR911 CEDAC in a leadership role should assemble a multidisciplinary task force from the City of Modesto, Stanislaus County, and include members of the emergency response community in Stanislaus County to comprehensively update the SR911 JPA. This revision task force should be formed by October 31, 2025, with a target completion date for the JPA revisions of April 30, 2026.

**Response:** The Sheriff's Office agrees with this recommendation for the reasons outlined above in Finding F1a.

**R1b.** The SCCGJ recommends that the County Board of Supervisors and Modesto City Council implement the necessary actions to complete the following recommendation: The JPA revision task force should make necessary revisions, including but not limited to detailed policy for the role and authority of the SR911 Director by April 30, 2026.

**Response:** The Sheriff's Office agrees with this recommendation. Furthermore, all positions, partners and committees should have outlined roles, responsibilities and authorities that are memorialized in policies, bylaws and user agreements.

**R1c.** The SCCGJ recommends that the County Board of Supervisors and Modesto City Council implement the necessary actions to complete the following recommendation: The JPA revision task force, with assistance from the City of Modesto and Stanislaus County legal and purchasing departments, should develop their own comprehensive, detailed RFP process for future use when making major purchases by April 30, 2026.

**Response:** The Sheriff's Office agrees with this recommendation. No RFP process was ever completed for the purchase of a new CAD product. To date, no list of requirements, impacts or evaluation criteria was ever discussed, much less agreed upon in advance. This standard practice was ignored, had it been followed, this entire issue would not exist.

**R1d.** The SCCGJ recommends that the County Board of Supervisors, Modesto City Council, and Stanislaus County Sheriff's Office implement the necessary actions to complete the following recommendation: The JPA revision task force and the Sheriff's Office should address and develop written policy concerning the responsibility for maintaining compliance with CLETS regulations including designating responsibility for performing recurring required audits of security of the CLETS information by April 30, 2026.

**Response:** The Sheriff's Office agrees in principle. However, California Law Enforcement Telecommunications System (CLETS) oversight is a law enforcement function and highly controlled by state law.

SR911 has had unsecure and potential misuse of CLETS data within County Computer Aided Dispatch (CAD) system utilized by several first responder entities throughout the county.

CLETS data is derived from Criminal Justice Information Services (CJIS), a federal database which houses sensitive Law Enforcement data. The Sheriff's Office is the hub of this data and provides a pipeline to all Law Enforcement agencies in the county. Each agency has its own Agency CLETS Coordinator (ACC) and is responsible for granting access and ensuring everyone in their respective agencies have proper training and clearance. The Sheriff's Office is also the pipeline to deliver this sensitive data to Stanislaus Regional 911 (SR911). While SR911 is a Non-Law Enforcement Agency, they have permission to utilize this sensitive data if their staff have the proper training and clearance to view this data. Below are several key issues and concerns with the safeguarding of this data and structure of SR911:

1. CLETS data is stored in CAD.
2. CAD is currently managed and maintained by SR911.
3. The Sheriff's Office has no audit authority or administrative rights to CAD.
4. SR911 grants CAD access to all fire agencies in the county.
5. SR911's position is that it's not responsible for monitoring or auditing the fire mobile data terminals (MDT's), it is the fire agencies' responsibility.
6. Fire personnel in Stanislaus County do not have the proper clearances to access or view restricted or sensitive CLETS data. Currently there are approximately 300 firefighter users of the CAD system with approximately 170 MDT's assigned to fire departments within Stanislaus County.

These are major issues with the current CAD and there is no way of ensuring this problem will be solved with the implementation of the proposed new CAD, Central Square. No RFP was ever conducted, and the security concerns were never addressed. With SR911 as the CAD administrator, the Sheriff's Office has no way of safeguarding CLETS data within CAD.

Another concern regarding our CLETS data stored in CAD is the Public Records Act (PRA). The CLETS data stored in CAD is information that belongs to the Sheriff's Office. When a PRA is requested by SR911, no one at the Sheriff's Office is contacted about the release of the information. Although County Council is consulted, there may be times when information cannot be released or not redacted correctly.

The Sheriff's Office has no administrative users for CAD. The Sheriff's Office should be able to verify their own user permission levels and have the ability to

install CAD client on our terminals. SR911 has only two administrators for CAD with hundreds of requests, taking time for the requests to be completed.

One of the requests the Sheriff had during the conclusion of the CLETS investigation was for the Sheriff's IT Manager to have administrative rights, and the audit authority for the Sheriff's Records Manager. Although the process has begun, neither one has access to the system.

**F2.** The Board of Supervisor's letter to Sheriff Jeff Dirkse dated March 11, 2025, (See Appendix) is a detailed description of the history and chronology of the emergency dispatch issues in Stanislaus County and is highly consistent with the findings of this investigation. The letter reiterates the steps necessary for the consideration of any future proposal for an alternative dispatch system including response time analysis, the inclusion of subject matter experts and stakeholders' input, fiscal analysis, and review by County Counsel and County Purchasing Agent.

**Response:** The Sheriff's Office agrees with this finding, in principle. However, it requires that both parties work together and participate in solutions. To date the county has been unwilling to discuss in any detail any of the several proposals that have been presented.

**R2a.** The SCCGJ recommends that the County Board of Supervisors and Stanislaus County Sheriff's Office implement the necessary actions to complete the following recommendation: It is recommended that both the Sheriff's Office and County Officials strictly adhere to the requirements included in the letter of March 11, 2025, going forward in order to prevent any further misunderstandings or miscommunications that have resulted in delays in the past.

**Response:** The Sheriff's Office agrees with this finding, in principle. However, it requires that both parties work together and participate in solutions. To date the county has been unwilling to discuss in any detail any of the several proposals that have been presented.

**R2b.** The SCCGJ recommends that the County Board of Supervisors and Stanislaus County Sheriff's Office implement the necessary actions to complete the following recommendation: It is recommended that the Sheriff's Office adhere to usual and customary practices requested by county officials for providing information in advance of public meetings so that information can be reviewed by officials and the public prior to meetings.

**Response:** The Sheriff's Office disagrees with this recommendation. The agenda item presented to the public prior to the meeting had all of the information required.

**F3.** The Stanislaus County Sheriff's Office is the outlier among all of the other stakeholders in the emergency dispatch controversy. Political tactics, threats

of litigation, personal attacks, refusal to work with key operatives, and the appearance of intimidation by the Sheriff's Office faction in this dispute has damaged both personal and working relationships with interrelated government agencies and personnel.

**Response:** The Sheriff's Office disagrees with this finding. Policy disagreements will be part of any government whether it be local, state or federal. An "appearance of intimidation" is not actually intimidation. Refusal to work with "key operatives" is bidirectional. Since no process for selecting CAD was ever determined or defined by SR911 there was clearly no attempt to work with all of the participating agencies to make the best selection for all parties involved.

Furthermore, neither the Grand Jury report nor the JPA has had any meaningful discussion regarding the state-mandated investigation into the CLETS violations. CLETS violations are potentially a serious criminal matter, potentially felonious, and require a legitimate and full-fledged investigation. That is not a political tactic, personal attack or intimidation. It is a legal mandate and a duty that must be performed. Both the Grand Jury and the JPA need to recognize that.

**R3a.** The SCCGJ recommends that the County Board of Supervisors, Modesto City Council, and Stanislaus County Sheriff's Office implement the necessary actions to complete the following recommendation: Stanislaus County, City of Modesto, and the Sheriff's Office officials should utilize independent outside intervention in the form of professional mediators and/or subject matter experts to process interpersonal damages in working relationships of key figures and to provide unbiased information related to product efficacy. The use of outside professional mediators and subject matter experts should commence by October 31, 2025.

**Response:** The Sheriff's Office disagrees with this recommendation. It is not necessary and previous outside studies completed on behalf of SR911 have never been addressed or implemented.

**R3b.** The SCCGJ recommends that the County Board of Supervisors, Modesto City Council, and Stanislaus County Sheriff's Office implement the necessary actions to complete the following recommendation: The Sheriff's Office needs to take a lead role in reconciliation with the other stakeholders and acknowledge that it is only one county department among many with competing interests and must function in a more cooperative, collaborative manner.

**Response:** The Sheriff's Office disagrees with this finding and recommendation. While the Sheriff's Office is more than willing to reconcile and move forward; the fundamental issues with the structure, organization, processes and policies must be addressed for reconciliation to occur.



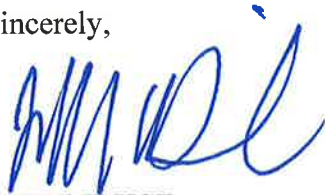
**F4.** Stanislaus County-based oversight of the Sheriff's Office is inadequate given the potential impact its policies and the actions taken could have on the communities it serves. Opportunities exist to improve accountability, transparency, understanding, tolerance, and trust between all parties. The Stanislaus County Board of Supervisors has the option under Government Code §25303.7 to establish a Sheriff's Oversight Board consisting of citizens appointed by the Board of Supervisors and/or an Office of Inspector General to assist in overseeing the Sheriff's Office to enhance the Sheriff's Office accountability and transparency.

**Response:** The Sheriff is a countywide elected official. As such, the Sheriff has the greatest oversight- the people of Stanislaus County. No other elected official or elected body has an appointed oversight. Following this logic, every elected official or body should have an appointed oversight. This would directly weaken the power and voice of the voters and is contrary to the American way of governance.

**R4.** The SCCGJ recommends that the County Board of Supervisors implement the necessary actions to complete the following recommendation: The Stanislaus County Board of Supervisors should initiate action to create a Stanislaus County Sheriff's Oversight Commission and/or an Office of Inspector General pursuant to Government Code §25303.7. This can be accomplished by either an action by the Board of Supervisors or through a vote of county residents. This recommendation should be accomplished by December 31, 2025.

**Response:** The Sheriff's Office disagrees with this recommendation for the reasons stated above in F4.

Sincerely,



JEFF DIRKSE  
Sheriff-Coroner  
Stanislaus County