IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

RHONDA LEDFORD, an individual; RAYMON GREGSTON, an individual; JO MCKINNEY, an individual; SHANE PENROD, an individual; KIM MCCORMICK, an individual; BOB ROBINSON, an individual; and GRACIE REYNA, an individual,	
Plaintiffs,) 1:12-cv-00326-BLW
vs.)
IDAHO DEPARTMENT OF JUVENILE CORRECTIONS, an executive department of the State of Idaho; IDJC DIRECTOR SHARON HARRIGFELD, in her individual and official capacities; IDJC JUVENILE CORRECTIONS CENTER - NAMPA SUPERINTENDENT BETTY GRIMM, in her individual and official capacities; and DOES 1-20, Defendants.	<pre>> > ></pre>
DEPOSITION OF DARLA C	RESPIN

OCTOBER 2, 2013

REPORTED BY:

BEVERLY A. BENJAMIN, CSR No. 710, RPR

Notary Public

	Page 2		Page 4
1	THE DEPOSITION OF DARLA CRESPIN was taken on	1	DARLA CRESPIN,
2	behalf of the Plaintiffs, at Anderson, Julian & Hull,	2	first duly sworn to tell the truth relating to said
3	250 South Fifth Street, Suite 700, Boise, Idaho,	3	cause, testified as follows:
4	commencing at 9:08 a.m. on October 2, 2013, before	4	
5	Beverly A. Benjamin, Certified Shorthand Reporter and	5	EXAMINATION
6	Notary Public within and for the State of Idaho, in the	6	QUESTIONS BY MR. SCHOPPE:
7	above-entitled matter.	7	Q. Good morning.
8		8	A. Good morning.
9	A P P E A R A N C E S:	9	Q. Thank you very much for coming here today.
10	For the Plaintiffs:	10	A. You are very much welcome.
11	Law Office of Andrew T. Schoppe, PLLC	11	Q. My name is Andrew Schoppe. I represent the
12	BY MR. ANDREW T. SCHOPPE	12	Plaintiffs.
13	910 W. Main Street, Suite 358	13	A. I've heard a lot about you.
14	Boise, Idaho 83702-5796	14	Q. I hope it's all good. Probably not. But
15	For the Defendants Idaho Department of Juvenile	15	thanks a lot for coming.
16	Corrections, Sharon Harrigfeld, and Betty Grimm:	16	First off, have you ever had your deposition
17	Anderson, Julian & Hull, LLP	17	taken before?
18	BY MS. ANDREA J. FONTAINE	18	A. I have not.
19	C. W. Plaza	19	Q. Lucky you, until today. But we'll make it as
20	250 South 5th Street, Suite 700	20	pain-free as possible.
21	P.O. Box 7426	21	A. Okay.
22	Boise, Idaho 83707-7426	22	Q. Generally speaking, I'm just going to be
23		23	asking you questions, just do your best to give me the
24	Also Present: Rhonda Ledford, Nancy Bishop, Shane	24	best possible truthful answer that you can. If you have
25	Penrod, Lisa Littlefield	25	any questions or if anything is not clear to you in my
	Page 3		Page 5
1	I N D E X	1	question, by all means, ask me to clarify or restate it
2	TESTIMONY OF DARLA CRESPIN PAGE	2	or rephrase it, whatever would help you understand it.
3	Examination by Mr. Schoppe 4	3	A. Okay.
4	Examination by Ms. Fontaine 61	4	Q. Whenever possible wait until I've finished
5	Further Examination by Mr. Schoppe 65	5	asking the question before you give your response, and
6	Further Examination by Ms. Fontaine 68	6	that is for the benefit of our court reporter.
7		7	A. Okay.
8	EXHIBITS	8	Q. And a clearer record.
9	NO. DESCRIPTION PAGE	9	A. Does everybody ask me questions?
10	153 - Questionable IDJC Hiring Practices in 36	10	Q. No, just me.
11	the Last Three Years	11	A. Okay.
12		12	Q. And the attorneys here will be free to object
13		13	to any question that I ask and things like that.
14			
		14	A. Okay.
15		14 15	A. Okay.Q. And just generally speaking, I am entitled to
			2
15		15	Q. And just generally speaking, I am entitled to
15 16		15 16	Q. And just generally speaking, I am entitled to your best answer, whatever you know, what you've seen, heard. And if it's something that you sometimes in an organization there will be something that you heard
15 16 17 18 19		15 16 17 18 19	Q. And just generally speaking, I am entitled to your best answer, whatever you know, what you've seen, heard. And if it's something that you sometimes in an organization there will be something that you heard about via rumor, if you can do your best to tell me who
15 16 17 18 19 20		15 16 17 18 19 20	Q. And just generally speaking, I am entitled to your best answer, whatever you know, what you've seen, heard. And if it's something that you sometimes in an organization there will be something that you heard about via rumor, if you can do your best to tell me who you might have heard something from or who might be the
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15 16 17 18 19 20 21 22 23 24		15 16 17 18 19 20 21 22 23 24	 Q. And just generally speaking, I am entitled to your best answer, whatever you know, what you've seen, heard. And if it's something that you sometimes in an organization there will be something that you heard about via rumor, if you can do your best to tell me who you might have heard something from or who might be the best person to ask for that. A. Okay. Q. Anything impacting your ability to testify here today, whether it be memory problems, prescription
15 16 17 18 19 20 21 22 23		15 16 17 18 19 20 21 22 23	 Q. And just generally speaking, I am entitled to your best answer, whatever you know, what you've seen, heard. And if it's something that you sometimes in an organization there will be something that you heard about via rumor, if you can do your best to tell me who you might have heard something from or who might be the best person to ask for that. A. Okay. Q. Anything impacting your ability to testify

	Page 6		Page 8
1	A. I'm almost 60, but other than that, no.	1	A. In July of 2000.
2	Q. If you need a break at any point, by all means	2	Q. How did that application process go? Did you
3	just ask us, just wait until you've answered whatever	3	hear back from anybody in particular on your
4	question I've asked last, let me know.	4	application, or what happened?
5	A. Okay.	5	A. Well, I turned in the application, I got the
6	Q. You are testifying here just as if you were	6	results back on my score, and then I was called for an
7	testifying in court.	7	interview. And I went to an interview with Betty
8	A. Okay.	8	Grimm, she was a nursing supervisor at the time, and
9	Q. Just a little bit about your background. Are	9	then I was hired.
10	you from Idaho?	10	Q. Do you recall who the superintendent of the
11	A. I am.	11	Nampa facility was?
12	Q. Did you go to college here?	12	A. Larry Callicutt.
13	A. Yes.	13	Q. How about the director of the department?
14	Q. I understand that you are a nurse; is that	14	A. Brent Reinke.
15	right?	15	Q. Did you know anybody who worked at the
16	A. Yes.	16	Department before that?
17	Q. Where did you do your nursing training?	17	A. I did not.
18	A. BSU.	18	Q. What was the first position you started in?
19	Q. Any other certifications is it an RN that	19	A. As an LPN.
20	you have?	20	Q. Who else did you work with there in the
21	A. An LPN.	21	nursing department?
22	Q. That's a licensed practical nurse?	22	A. Well, Betty, she was the supervisor. Mary
23	A. Yes. In 1988.	23	Ritthaler, she was an LPN there. There has been a lot
24	Q. Any other licenses or certifications or	24	of nurses come and go. Kathy Tipton. That was back
25	credentials along those lines that you might have?	25	then. Now do you want to know who works there?
	Page 7		Page 9
1	A. CPR and first aid instructor, that's it. IV	1	Q. Yeah, sure. Let's go back to, say, 2009, who
2	certified.	2	you worked with in that time frame.
3	Q. Did you do anything before you became a nurse?	3	A. Frank Farnworth I can't remember. I don't
4	A. I was a mom.	4	remember. I know who works there now.
5	Q. That's a big thing.	5	Q. Okay. Who is that?
6	How about your work history after you got your	6	A. Sandy Bieker, Simone Cates, our supervisor is
7	nursing degree, where did you work?	7	Jeanette Angell, Jennifer Rolfson. There is another
8	A. Idaho State School and Hospital, at the VA	8	one.
9	Hospital, I worked out at the prison for a short time.	9	Q. Okay.
10	When we moved to Oregon, I worked at a hospital and then	10	A. There is another one. Amy Williams. Sorry about that.
11	I worked at the Umatilla County Jail.	11 12	
12	Q. Jail operations can be rough. My wife used to do psych screenings at the County Jail; that was one	13	Q. No problem, you don't need to apologize. I don't always remember all of the Plaintiffs' names when
13 14		14	I try to list them out like that.
15	exciting story after another. After Umatilla, what did you do next?	15	That's Amy Williams?
16	A. I came back to Boise, worked at the VA, and	16	A. Uh-huh.
17	then where I am now.	17	Q. Another general guideline or rule is, if you
18	Q. And how is it that you came to work for the	18	can't remember something, go ahead and say so, and if it
19	Department of Juvenile Corrections?	19	pops in your head later, just let me know.
20	A. At the VA Hospital I was tired of patients	20	A. Okay.
20	dying on me, I was tired of lifting, bathing, and all	21	Q. Have you been promoted or changed positions
22	that stuff. And I knew that working in Corrections	22	since you started as an LPN?
23	was they had an ad in the paper and I applied.	23	A. No.
24	Q. Do you remember what year that was that you	24	Q. When did you actually start?
25	applied?	25	A. July 2000, I think it was July 16 or
	-FE		······································

Case 1:12-cv-00326-BLW Document 55-30 Filed 02/07/14 Page 28 of 29

	Page 10		Page 12
1	something.	1	A. Gossip. Gossip, everybody knew, everybody was
2	Q. Fair to say that your duties have been more or	2	talking about it. I know there was an announcement made
3	less the same since then?	3	that she was promoted, and then there was an
4	A. Yes.	4	announcement made that the position would be now vacant.
5	Q. During that time when you started, Betty	5	Q. Do you recall if that was in an all-staff
б	Grimm was your supervisor?	6	e-mail?
7	A. Yes.	7	A. I don't recall.
8	Q. And then at some point she became the	8	Q. I think there is an e-mail to that effect in
9	superintendent of the facility; right?	9	there, in our exhibits. I'll see if I can pull that out
10	A. Yes.	10	at some point.
11	Q. Who was your supervisor after that, when she	11	Do you recall I'll show you an exhibit,
12	became the superintendent?	12	something we've been referring to in this litigation as
13	A. Ruth, crazy Ruth.	13	the petition. Is that something that you've seen
14	Q. Ruth Davis?	14	before? Take as much time as you need to look at it.
15	A. Davis, yes. Ruth Davis.	15	A. (Reviewing document.) Yes, I did see this.
16	Q. When was that that	16	Q. Do you recall how you came to see it? Did
17	A. Boy, I don't know.	17	someone show it to you?
18	Q. We'll figure that out later.	18	A. Yes.
19	And after Ruth Davis?	19	Q. Who was that?
20	A. We had Rose Smith; she's dead.	20	A. I don't recall.
21	Q. That's too bad. And then	21	Q. Do you know if it could have been Ray
22	A. Jeanette Angell.	22	Gregston?
23	Q. And that is your current supervisor.	23	A. Possibly.
24	A. Yes.	24	Q. Do you recall discussing the petition with
25	Q. In the course of any given day, what is it	25	anybody in particular?
	Page 11		Page 13
1	Page 11 that you do as a nurse at the Department?	1	Page 13 A. I think we all talked about this. Several
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1	A. I do not recall, no.	1	Q. And then Dave Rohrbach was at the time a unit
2	Q. Do you know anyone else who signed the	2	manager; is that right?
3	petition?	3	A. Yeah.
4	A. No.	4	Q. How about human resources?
5	Q. But you are aware that other people, some	5	A. I don't know. I do believe that she's the one
6	other people did sign it.	6	that sent out of the e-mail when they took the job back
7	A. Right. I think that Bob the Builder, Bob the	7	from Laura, I think it was from HR.
8	maintenance guy.	8	Q. When you say "she," would that be Julie Cloud?
9	Q. Bob Robinson?	9	A. I guess that is her name. I don't know her
10	A. Is that his name? Yeah.	10	very much.
11	Q. I think that is who you are referring to.	11	Q. What was it that made you think that they knew
12	A. Yeah.	12	who would get the job beforehand?
13	Q. How about staff from O&A, do you know if	13	A. Because of Rohrbach.
14	anyone from there signed it?	14	Q. What do you mean by that?
15	A. I do not.	15	A. Because he wanted Laura, that was his little
16	Q. Did you ever discuss it with Tom Knoff?	16	pet. He was going to make sure she had a good job
17	A. I don't know if he was still there at this	17	before he quit.
18	time. I can't remember. I can't remember going in I	18	Q. Do you know why he was quitting?
19	know I did go in and talk to Tom, because Tom was my	19	A. I don't know, because he's old, sick, I guess.
20	friend.	20	And he was just gone one day, that was the end.
21	Q. Because of the petition you talked to him or	21	Q. Did you hear anything about timecard fraud in
22	you talked to him about those concerns?	22	connection with his departure?
23	A. I can't recall for sure.	23	A. Well, yeah, I heard about it, but I didn't
24	Q. I think it's clear from the record that he	24	have any proof of it. I know that he wasn't there a
25	left the Department in May or June of 2012, if that	25	lot, so I didn't know.
	Page 15		Page 17
1		1	
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1	But she's my friend, and I didn't go talk to her about	1 think it's mellowed out now.
2	this, no.	2 Q. Did you ever hear other employees express a
3	Q. That's fine. That's just the facts.	3 heightened fear for their safety?
4	Did you ever talk with Betty about hiring	4 A. Sure.
5	Laura Roters and firing Tom Knoff?	5 Q. What did you hear about that?
6	A. Yeah, I told her it was the two stupidest	6 A. Just that they were it was scary being down
7	things she ever did.	7 there working sometimes with the kids and not enough
8	Q. Why did you think that?	8 staff and that things were they were afraid. There
9	A. Well, because Tom is a good guy and Laura, I	9 was staff injured and kids injured. And as a nurse, we
10	don't like her.	10 are not down there that much, we go after, so
11	Q. With respect to Mr. Knoff, how long had you	11 Q. Again, we are talking about a change after
12	worked with him?	12 2009 when Director Harrigfeld took over?
13	A. When did he get fired?	13 A. Yes.
14	Q. Was he there when you got to the Department?	14 Q. Did you ever hear juveniles express fears for
15	A. Yes, he was there when I got there.	15 their safety after that time, sort of an increase in
16	Q. Did you ever talk about safety problems	16 fears?
17	let's focus on the period from 2009 up to the time that	17 A. I don't know about that time, but I heard
18	Mr. Knoff left. Did you ever talk about safety problems	18 something yesterday that a kid was afraid that he was
19	with him or concerns over unreasonably unsafe conditions	19 going to be attacked by another kid. That was yesterday
20	at the facility?	20 morning. But I don't know, like the kids, when they
21	A. I can't recall. That was kind of a things	come to the clinic, they are usually there for medical
22	had changed. When a kid used to beat up somebody, they	stuff and they usually don't
23	got 72 hours in their room. When the new superintendent	23 Q. Did you ever hear any juveniles express
24	took over, that was changed. They could beat somebody	24 concerns that if they had been attacked in those
25	up and then come out after they wrote a letter or	25 situations, that their attacker would be right back out
	Page 19	Page 21
1	Page 19 something. But I don't remember, I don't remember going	Page 21 1 with them?
1 2		
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2	something. But I don't remember, I don't remember going in there and talking to Tom about it, no.	 with them? A. No, I never heard any of that.
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	Page 22		Page 24
1	A. No. To fire after she had quit, that is	1	can't do.
2	when I told her it was stupid of her to fire Tom and	2	Q. As far as you are concerned, is she respectful
	hire Laura.	3	towards her subordinates?
3			
4	Q. When did you talk about that? Was this right	4	A. No.
5	after she quit or just at some point?	5	Q. What makes you say that?
6	A. Yeah, after she quit at some point.	6	A. Just situations that have happened that
7	Q. And is that what you spoke about with her,	7	just situations that I've seen happen.
8	that Tom was a good guy or did a good job or anything	8	Q. Can you come up with any examples? I know
9	specific in that regard regarding Mr. Knoff?	9	it's hard because
10	A. Yes. She knew how I felt, that I thought Tom	10	A. Yeah, I can give you an example. I went to an
11	was a good guy.	11	all-staff meeting after she was appointed not an
12	Q. What did she have to say to you about that?	12	all-staff, but with her staff, a meeting after she took
13	A. She just said that it was just there were	13	over down there, just a couple, two or three times
14	other things that she wasn't she couldn't discuss.	14	after, because we'd go to the team meetings and I was at
15	And I wouldn't expect her to discuss them with me if it	15	the team meeting. And the staff had had a situation
16	was personnel things that had happened. That is really	16	with a juvenile. They had handled the situation, they
17	none of my business.	17	handled it. The kid didn't get restrained or get put in
18	Q. Did you get the sense or impression that was	18	his room and came out with a positive outcome of the
19	in connection with his termination or settlement	19	situation, and everything was fine, and the staff were
20	agreement or something like that?	20	telling how they handled the situation. And when they
21	A. No.	21	got through telling what they had done, she said: Now
22	Q. What did you talk about with respect to Laura	22	let me tell you what you should have done. And that to
23	Roters' hiring with Betty Grimm?	23	me right I got up and left, because I thought that
24	A. What did I say?	24	was BS, I thought that was totally out of line, because
25	Q. Sure. What did you guys talk about?	25	they had done just fine.
	Page 23		Page 25
1	A. I asked her what the hell was the matter with	1	As a new supervisor, instead of saying, Way to
2	her putting that witch in charge of anything.	2	go, guys, you got that handled without problem. And now
3	Q. Sounds like you don't have a terribly	3	let me tell how you should have done it? No. That's
4	favorable impression of Ms. Roters?	4	the only example I've got really that I better talk
5	A. No, I do not like her at all.	5	about.
6	Q. Why is that?	6	Q. When you are talking about the unit that you
7	A. Because she's pushy and she talks down to	7	were just talking about, you are talking about O&A?
8	1 5		were fust tarking about, you are tarking about $O\alpha A$?
	everybody.	8	
9	everybody. O. Are you familiar with a policy of the	8 9	A. Yes.
9 10	Q. Are you familiar with a policy of the		A. Yes.Q. After she took over there from Tom Knoff; is
9 10 11	Q. Are you familiar with a policy of the Department called standards of conduct regarding respect	9	A. Yes.Q. After she took over there from Tom Knoff; is that right?
10 11	Q. Are you familiar with a policy of the Department called standards of conduct regarding respect and things like that in the workplace?	9 10	A. Yes.Q. After she took over there from Tom Knoff; is that right?A. Correct.
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	Page 26		Page 28
1	qualified and would have been much better at that job.	1	stuff.
2	Q. I think you are referring to the first unit	2	Q. Are you talking about people like Dave
3	manager position that she was promoted to and that was	3	Hottell?
4	revoked.	4	A. He quit.
5	With respect to well, do you recall that	5	Q. Robin Smythe?
6	after that situation arose that she was then later	6	A. Yeah, she quit. Good people. Good people.
7	promoted into that unit manager spot?	7	Q. Anybody else come to mind?
8	A. Right.	8	A. I can't remember. There has been so many
9	Q. I think that was in Solutions.	9	that
10	A. I don't know where she went.	10	Q. How about Diane Carnell?
11	Q. Choices and Solutions, I guess.	11	MS. FONTAINE: What's the question?
12	And then at some point after that do you	12	Q. (BY MR. SCHOPPE) Same question I was asking
13	recall that she we've already talked about her taking	13	with respect to the others. Do you know what happened
14	over O&A after Tom Knoff left.	14	with these people?
15	A. Right.	15	A. No, I have no idea.
16	Q. Do you recall speaking with anybody about how	16	Q. How about Todd Inman, do you know if he left
17	that occurred, how she moved from Solutions unit manager	17	or why he might have left after
18	over to O&A unit manager?	18	A. No. I don't know why he left.
19	A. I don't recall any specific conversation. I	19	Q. Sheri Estrada?
20	mean everybody was talking about it, how it didn't	20	A. I don't even remember who that is.
21	seem it seemed like when they got Tom out of there	21	Q. What were you hearing about why it was that
22 23	and put her in there, it seemed like a kick in the teeth for the O&A staff.	22 23	people were, as you put it, putting in for transfers or
23 24	Q. What do you mean by that?	23 24	trying to get out? A. Because they didn't want to work for Laura.
24 25	A. I think that I don't know a lot of facts on	24 25	MS. FONTAINE: Object; lack of foundation.
25	A. I think that I don't know a lot of facts on	25	MS. FONTAINE. Object, lack of foundation.
	Page 27		Page 29
1	Page 27 what goes on with the promoting and hiring. All we have	1	
1 2		1 2	Page 29 Q. (BY MR. SCHOPPE) Did you hear anybody say that Laura Roters had been sent to clean house or to get
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2	what goes on with the promoting and hiring. All we have is speculation and gossip. That is all we have.	2	Q. (BY MR. SCHOPPE) Did you hear anybody say that Laura Roters had been sent to clean house or to get rid of people in O&A? A. No.
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1 earth secher doing that. Maybe I don't want to believe it. There you go. 1 the facility? 2 i. There you go. A. The name is familiar. Learth put a face with the kid dough. 4 Did you ever talk with Betty about what she police? A. The name is familiar. Learth put a face with the kid dough. 6 police? A. No. 7 A. No. O. Did she ever indicate that her decision to protice had anything to do with Julic McCornick? 8 O. Did she ever indicate that her decision to protice had anything to do with Julic McCornick? A. No. 10 In terms of incidents of child abuse or engot such situations to either law enforcement or the page anyone destination and experience as a marker, is in your training and background and experience as a marker, is in your andestanding that you are required to report such situations to either law enforcement or the Department of Health and Welfare? 7 A. Yes. We have a number posted in the clinic of whow cur to cull fail A dive prorts that to a supervisor or where does it go? A. I don't know, that she took the kid in the visitation rom out to the gym or something. And the kid's name was conding the kid was lying about it and admitted he was lying about it was or reports of sexual interactions between staff and 7 A. I hour the or was not been at the were required to visit the same of the suff that worked there, hut still term evas anothing the kid was lying about it and admitted he was lying about it was of tha low core, siskand on or for serut. There ha		Page 30		Page 32
2 it. There you go 3 Q. Inderstand. 4 Did you ever talk with Betty about what she 5 discovered that led her to report Julie McCormick to the police? 7 A. No. 9 retire had anything to do with Julie McCormick? 9 network indicate that her decision to police? 10 A. No. 11 Q. In terms of incidents of child abuse of report such situations to either hav noise required to report such situations to either hav roincrement or the Department of Health and Wclfart? 13 who we are to call if a kid report shut to us, yes. 14 O. No vankow who Jackie never came back. 15 report such situations to either hav enforcement or the Department of Health and Wclfart? 14 Q. Net weare to call if a kid report shut to us, yes. 15 or report sof sexual interactions betty our are required to reports of sexual interactions between staff and 12 A. We tell our supervisor after we've made the fact on or factual interactions between staff and 12 page 31 13 juveniles at the Department? 2 A. In our facility? 3 A. In our facility? 4 A. Ino rangle on in Lewiston. Hoonk kook of the stow mether in	1	can't see her doing that Maybe I don't want to believe	1	the facility?
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2.5 recard a juvenile by the name of ivitchaer Curtis being in 2.5 A. Yes.	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. Was the first one you referred to with the Choices kid, could that have been Francine Diaz and Bryce A. Yes. Q. As far as you know, was that ever investigated or A. I have no idea. Q. The one in Lewiston, was that relatively recent, like within the last couple years? A. No. Q. A long time ago? A. Five or six years ago. Q. Do you recall any of the names that were involved in that? A. No, I do not. 	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Being a nurse, I've seen a lot of I've had to talk to him before about kids on medications, to get verification for medication to his office. He used to live next door to Syringa House. I forgot I worked there for a short time too, at Syringa House. And he's been in the news lately. Q. What have you heard about that? A. There is accusations that he molested some kids. Q. Do you recall when those allegations were made? A. No. It was probably last year. Q. Do you know of any connection between Juvenile and A.
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	Page 34		Page 36
1	Q. What is the connection, as far as you know?	1	Q. Do you know why it was, as you testified
2	A. That was when was up in Lewiston up at	2	earlier, that Mr. Rohrbach really wanted her in that
3	Northwest Children's Home. Pines was the doctor that	3	position; do you know why that was?
4	worked up there. And then didn't have anywhere	4	A. Well, yeah, because that was his friend. They
5	to go, I guess, and Pines was his foster parent or	5	were good friends, and he wanted to make sure she had a
6	something. I don't know if they I don't know. That	6	good job before he left. Dave Blume and Roters went to
7	was a long time ago. is now at our facility.	7	work for Rohrbach back in RPP. And after that then he
8	Q. Are you aware of Dr. Pines visiting at	8	always took care of them.
9	the Nampa facility?	9	Q. Do you know what role, if any, Betty Grimm
10	A. Before the acquisitions were made about him	10	played in promoting Ms. Roters to that unit manager
11	being a child molester, yeah, I think he did come in and	11	position?
12	see him.	12	A. Well, I would figure that she would have had
13	Q. How about after those allegations were made?	13	to have been all for it because she was the
14	A. I don't think so. But like I say, I'm not	14	superintendent.
15	down there on visiting days, so to be absolutely sure, I	15	Q. Did you ever discuss that with her?
16	don't know.	16	A. No.
17	Q. As a healthcare professional and as an	17	Q. When you say Dave Blume, is that Jo Blume?
18	employee of the Department, should Dr. Pines have been	18	A. Yeah, Jo Blume.
19	allowed to visit after those allegations were	19	MR. SCHOPPE: Let's take a short break.
20	made?	20	(Recess taken.)
21	MS. FONTAINE: Objection; lacks foundation.	21	MR. SCHOPPE: First of all, some housekeeping.
22	Q. (BY MR. SCHOPPE) Just in your opinion.	22	Can we mark this as the next exhibit.
23	A. No.	23	(Exhibit 153 marked.)
24 25	Q. Did anyone ever discuss with you or in your hearing that they had concerns about strange	24 25	Q. (BY MR. SCHOPPE) I'm going to ask you to take a look at this big book of exhibits here, take a look at
20	hearing that they had concerns about strange	25	a look at this big book of exhibits here, take a look at
	Page 35		Page 37
1		1	
1 2	interactions or inappropriate interactions between	1 2	document 136. I don't have another copy to share, just
	interactions or inappropriate interactions between		
2	interactions or inappropriate interactions between Dr. Pines and at the facility?	2	document 136. I don't have another copy to share, just what's there. Take your time to look through it and let
2 3	interactions or inappropriate interactions between Dr. Pines and at the facility? A. No.	2 3	document 136. I don't have another copy to share, just what's there. Take your time to look through it and let me know when you are done looking at it.
2 3 4	interactions or inappropriate interactions betweenDr. Pines and at the facility?A. No.Q. Did you work with Dr. Pines at the Syringa	2 3 4	document 136. I don't have another copy to share, just what's there. Take your time to look through it and let me know when you are done looking at it.A. (Reviewing document.) Just this one page?
2 3 4 5	 interactions or inappropriate interactions between Dr. Pines and at the facility? A. No. Q. Did you work with Dr. Pines at the Syringa House? A. No. Q. As far as you know, in your capacity as a 	2 3 4 5	document 136. I don't have another copy to share, just what's there. Take your time to look through it and let me know when you are done looking at it.A. (Reviewing document.) Just this one page?Q. Just go ahead and go to the next tab I mean
2 3 4 5 6	 interactions or inappropriate interactions between Dr. Pines and at the facility? A. No. Q. Did you work with Dr. Pines at the Syringa House? A. No. Q. As far as you know, in your capacity as a nurse, did he treat juveniles from the Nampa facility or 	2 3 4 5 6	 document 136. I don't have another copy to share, just what's there. Take your time to look through it and let me know when you are done looking at it. A. (Reviewing document.) Just this one page? Q. Just go ahead and go to the next tab I mean all the pages that are under that tab. A. Okay. (Reviewing document.) Q. So this is a document that we've discussed a
2 3 4 5 6 7 8 9	 interactions or inappropriate interactions between Dr. Pines and at the facility? A. No. Q. Did you work with Dr. Pines at the Syringa House? A. No. Q. As far as you know, in your capacity as a nurse, did he treat juveniles from the Nampa facility or other Department facilities, at Syringa House or the 	2 3 4 5 6 7	document 136. I don't have another copy to share, just what's there. Take your time to look through it and let me know when you are done looking at it.A. (Reviewing document.) Just this one page?Q. Just go ahead and go to the next tab I mean all the pages that are under that tab.A. Okay. (Reviewing document.)
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	Page 38		Page 40
1	time around male juveniles prior to the time she was	1	was kind of telling her things were better with this new
2	arrested?	2	lady we got.
3	A. The only thing I heard about Julie McCormick,	3	Q. Is that Lynn Viner?
4	she was spending too much time in the Solutions unit and	4	A. Yes.
5	bringing food in for one of the male staff that worked	5	Q. So that's since Betty retired?
6	there. That was all I heard, and they thought that she	6	A. Right, since she retired.
7	was having something going with one of the male staff.	7	Q. Did she expound on that at all? Did she talk
8	Q. Do you know who that was?	8	about, for example, in connection with Ms. Roters'
9	A. No, I don't recall which staff it was.	9	hiring or Mr. Knoff's termination?
10	Q. Do you know who you heard that from? Who told	10	A. No.
11	you that?	11	Q. Did Betty ever indicate to you that Ms. Roters
12	A. No, I don't know.	12	had been sent by the top or by Director Harrigfeld to
13	Q. Have you talked with Betty Grimm since she had	13	get rid of people in O&A?
14	her deposition taken in this case?	14	A. No.
15	A. No, I have not.	15	Q. Or to clean house in O&A?
16	Q. With respect to Ms. Roters, have you ever	16	A. No.
17	heard any kind of a rumor or report that she referred to	17	Q. Did you ever discuss Ms. Grimm having said
18	juveniles as dumb asses, and not just referred to in the	18	something like that with Ray Gregston?
19	third-party sense, but called juveniles dumb asses?	19	A. I talk to Ray a lot, but I don't recall saying
20	A. I never heard her say anything like that. I	20	that for sure.
21	never heard her say that. I wished I would have.	21	Q. Do you recall telling him anything like that?
22	Q. You never heard anybody say that she said	22	A. No, but no.
23	that?	23	Q. Do you recall discussing that Ms. Roters had
24	A. No.	24	been sent by Director Harrigfeld to clean house or get
25	Q. Why do you wish	25	rid of people in O&A with Lisa Littlefield?
	Page 39		Page 41
1			
	A. No, I don't. I just	1	A. I don't remember. I do not remember. And I
2	Q. Did Ms. Grimm ever indicate to you that she	2	don't know what Ms. Harrigfeld does. I don't know what
	Q. Did Ms. Grimm ever indicate to you that she felt that her decisions as superintendent were made for	2 3	don't know what Ms. Harrigfeld does. I don't know what her plan is.
2 3 4	Q. Did Ms. Grimm ever indicate to you that she felt that her decisions as superintendent were made for her by	2 3 4	don't know what Ms. Harrigfeld does. I don't know what her plan is. Q. I'm talking more about things that Betty
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2 3 4 5 6	 Q. Did Ms. Grimm ever indicate to you that she felt that her decisions as superintendent were made for her by A. Yes. Q. What did you hear about that? 	2 3 4 5 6	don't know what Ms. Harrigfeld does. I don't know what her plan is.Q. I'm talking more about things that BettyGrimm would have said to you about why Laura Roters was placed at O&A.
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	Page 42		Page 44
1	talking about that. The discussions I had with Betty	1	what we were talking about, was Tom Knoff and Roters
2	about Laura being down there in O&A were just that I	2	when she told me that, that she didn't make her own
3	thought that was one of the stupidest things she did.	3	decisions, that the decisions were
4	Q. Did you ever hear anybody say that Laura	4	Q. What makes you think that is what you were
5	Roters had been sent to clean house or get rid of people	5	talking about?
6	in O&A?	6	A. Well, I just think that that might have been
7	A. No, but it sure did appear that way.	7	something that came up, because that is when I told her,
8	Q. Why did it appear that way to you?	8	after she quit, that was the stupidest thing she did.
9	A. Because that's what happened.	9	And that might be when she said she didn't
10	Q. So did it seem unusual to you that people were	10	Q. Did she agree or disagree with you when you
11	leaving O&A after she got there, or what was it that	11	said that to her?
12	A. Was it unusual?	12	A. No. She didn't make her own decisions.
13	Q. What was it that made you think it was	13	That's all that was said.
14	something other than just the ordinary change of	14	Q. Did she offer any reason as to why it was that
15	personnel?	15	Ms. Roters was hired or promoted and Mr. Knoff was
16	A. Because everybody wanted out of there, no one	16	terminated?
17	wanted to work for her. Their schedules were changed,	17	A. You know, those are things that weren't my
18	their lives were changed.	18	no, I never really asked her why Tom got fired or why
19	Q. Did you ever talk with Tom Knoff about Betty	19	Roters got that job. Because why Tom got fired is a
20	indicating that Ms. Roters had been sent to clean house	20	personnel issue. I don't know. There is other things,
21	or get rid of people in O&A?	21	I'm sure. You can't just fire somebody. Why Roters got
22	A. No, I don't recall.	22	that job, I don't know.
23	Q. If he were to testify otherwise, would he be	23	Q. But Betty never told you why one way or the
24	lying?	24	other?
25	A. Yes, I guess so, because I don't remember.	25	A. No, I never asked her.
		1	
	Page 43		Page 45
1	Page 43 Q. Is that again to say, you could have talked	1	Page 45 Q. Did she ever indicate that she didn't know why
1 2		1 2	
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	Page 46		Page 48
1	things. A lot of people didn't like coming to work.	1	A. No. It seems like Shane was put on nights
2	People didn't want to come to work.	2	because God knows why. He was a good transport officer.
3	Q. You are pointing to the petition that we	3	He transported our kids for years for us, and then all
4	talked about?	4	of a sudden he's on the nightshift. I never figured
5	A. Yeah, stuff like that. And we never had that	5	that one out.
6	stuff before. There had been problems, but nothing	6	And Lisa, she was our transport coordinator,
7	things just got out of hand.	7	and she did an excellent job, had a good rapport with
8	Q. With respect to human resources, questions I	8	everybody in the state. And if we needed something, all
9	asked you before, involvement in problem solving or	9	we had to do was pick up the phone and call her and she
10	disciplinary proceedings, did you ever have any other	10	was like, Oh, for God's sake, okay, I'll do it. But it
11	involvement with human resources along those lines?	11	was like she always did her job and she did an excellent
12	A. I don't know, maybe little things, but I don't	12	job. And why she got pulled out of that position, I
13	remember any no, I don't remember anything.	13	don't know who she made angry, or whatever, but that
14	Q. Have you ever filed a problem-solving request?	14	should have never happened.
15	A. No.	15	Q. Do you know if she ever questioned Ms. Roters'
16	Q. Have you ever been subject to discipline by	16	qualifications for the job?
17	human resources?	17	A. I don't know anything about that. I just know
18	A. What do you mean?	18	that we lost when she got taken out of there, the whole
19	Q. Anything from are you familiar with the	19	facility lost.
20	progressive discipline system at the Department, from	20	Q. That's high praise.
21	sort of counseling, coaching?	21	And do you know who it was that put Shane
22	A. No, no.	22	Penrod on the nightshift?
23	Q. But you are familiar with that process?	23	A. I have no idea.
24	A. I've heard about it, but	24	Q. Stepping back to the fall 2011 time frame when
25	Q. When you say no, you mean to say that no,	25	there were concerns about hiring, promotions practices.
	Page 47		Page 49
1	Page 47	1	Page 49
1	you	1	Were you aware of a concern about the way in which Julie
2	you A. I never had that, no.	2	Were you aware of a concern about the way in which Julie McCormick had been placed as a supervisor in safety and
2 3	you A. I never had that, no. Q. Never been subject to discipline?	2 3	Were you aware of a concern about the way in which Julie McCormick had been placed as a supervisor in safety and security?
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2 3 4 5	 you A. I never had that, no. Q. Never been subject to discipline? A. No. MR. SCHOPPE: Give me two minutes to just take 	2 3 4 5	Were you aware of a concern about the way in which Julie McCormick had been placed as a supervisor in safety and security? A. I didn't I didn't have any I didn't understand it, because she was just a kid that came over
2 3 4 5 6	 you A. I never had that, no. Q. Never been subject to discipline? A. No. MR. SCHOPPE: Give me two minutes to just take a quick glance through my notes, then I think we are 	2 3 4 5 6	Were you aware of a concern about the way in which Julie McCormick had been placed as a supervisor in safety and security? A. I didn't I didn't have any I didn't understand it, because she was just a kid that came over from the Job Corps and then worked nights. Then the
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	Page 50		Page 52
1	e-mail and he got in trouble for that, and other people	1	the job.
2	did it all the time. Which we don't do anymore. But he	2	Q. So you've already testified, fair to say, that
3	used to that is one thing, yeah.	3	Laura Roters' hiring, her promotion, fits into that
4	Q. Did you agree with him, disagree with him,	4	category?
5	that he had been subjected to retaliation?	5	A. Yes.
6	A. I didn't know enough about the situation, but	6	Q. Same with Julie McCormick?
5 7	I listened to him, so I probably agreed with him.	7	A. Yeah. I don't know who all applied for her
8	Q. A different question from asking whether Ms.	8	job though.
9	Roters whether you ever heard anybody say that Ms.	9	Q. Are there any other specific examples that
10	Roters was sent to clean house. Did you ever hear	10	come to mind when you are talking about that?
11	anybody say that she was or that they had heard she was	11	A. Sarah Cerda, I don't know how she got the job
12	sent to clean house or get rid of people in O&A?	12	she's got. She's down in Choices, drug and alcohol
13	A. No. No, I don't think so. But it was pretty	13	something. I don't know how she got that job.
14	obvious that she was.	14	Q. Why is it you think that she might not deserve
15	Q. For the same reasons that you talked about	15	that job?
16	before?	16	A. Well, she hasn't been there that long and
17	A. Yeah, because she got rid of everybody.	17	she's gone a lot, off a lot, sick a lot, calls in a lot,
18	Q. When you say "it was pretty obvious that she	18	yet she got promoted when there were other people who
19	was," was that something that, as far as you know, a	19	applied for that position that didn't get it. But I'm
20	decision that Betty made or Director Harrigfeld or	20	the nurse, I don't know what the hiring deal is. But I
21	someone else?	21	was very shocked when she got that job.
22	A. I don't know who made the I don't know who	22	Q. Do you have any involvement in the drug and
23	made that decision.	23	alcohol counseling program at all?
24	Q. Is it your understanding, based on your prior	24	A. No.
25	testimony, that it was not Betty Grimm's decision to	25	Q. Are you AUF certified, by the way?
	Page 51		Page 53
-			rage 55
	appoint har to that position?	1	A Vach Wall wash we are not full blown able
1	appoint her to that position?	1	A. Yeah. Well, yeah, we are not full-blown able
2	A. Well, after she told me she didn't make any	2	to do hand-to-hand combat, but we take training and can
2 3	A. Well, after she told me she didn't make any decisions without the approval from upstairs, yeah. But	2 3	to do hand-to-hand combat, but we take training and can defend ourselves a little bit.
2 3 4	A. Well, after she told me she didn't make any decisions without the approval from upstairs, yeah. But Ms. Roters and I, that goes back a long ways. I just	2 3 4	to do hand-to-hand combat, but we take training and can defend ourselves a little bit. Q. How about POST certified, do you have anything
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	Page 54		Page 56
1	that.	1	happens.
2	Q. Did you ever hear any sentiment like that on	2	A girl got attacked in the gym one day at
3	the part of Ms. Grimm or anybody in human resources or	3	breakfast and there weren't very many staff there. That
4	Director Harrigfeld or anybody like that?	4	was an incident. It all depends. It's not an everyday,
т 5	A. No, I can't say for sure. Harrigfeld, no.	5	walk in there and be afraid. You've got to be aware and
6		6	•
	But Betty I can't remember for sure on her.	7	know what is going on. But that hasn't changed since
7	Q. Have you ever heard anybody express any		the day I started.
8	concerns over safety issues, like juveniles being	8	Q. Do you know what a "staff assist" is?
9	allowed to wear gang colors in the facility or having	9	A. Yeah.
10	too easy access to weapons or things that can be turned	10	Q. What is that?
11	into weapons, things like that? Again, we'll focus on	11	A. That's just where if a kid walks out of class,
12	in the last five years.	12	a staff just goes and follows him around.
13	A. Yeah, the kids in Choices wear what they want.	13	Q. Is that a different approach to dealing with
14	And one day this kid was all dressed in red from head to	14	that situation than what existed before Director
15	toe. And it's like, What the heck is going on? But I	15	Harrigfeld took over or
16	don't know if he earned I don't know.	16	A. That is just something new since Ms. Viner
17	Q. Did you have an understanding that was a gang	17	took over.
18	color or a gang affiliation?	18	Q. Does that to you seem to constitute a safety
19	A. Yeah, he said that was his gang color. I	19	problem, as far as you are concerned?
20	said, Why do you have on all those red clothes?	20	A. Having the staff chase the kid all over the
21	That is my color.	21	building? It could become a safety problem for anybody
22	Q. As far as you know, is wearing gang colors	22	the kid encounters.
23	inside the facility prohibited?	23	Q. Fair to say a juvenile could encounter other
24	A. I don't know. I don't know.	24	juveniles or staff?
25	Q. Did he tell you which gang?	25	A. Sure.
	Page 55		Page 57
1	A. No.	1	Q. Do you know what the policy was before the
2	Q. Bloods or Aztecs or Mayans?	2	change?
3	A. It's the North or the South or the something.	3	A. When a kid walked out of class?
4	I don't know. I just thought that was a little strange	4	Q. Yes.
5	because that has never happened before.	5	A. They contained the kid. They gathered around
б	Q. Before when?	6	the kid and kept him from moving throughout the
7	A. In the last I had never seen it before, a	7	facility.
8	kid dressed like that, until just recently. First time	8	Q. Have you ever heard of any rumors or reports
9	I had seen one was a month or two ago.	9	of sexual or romantic relations between Bryce and
10	And weapons, we try to keep things picked up	10	a juvenile by the name of
11	and put away from the kids, but they do get stuff. You	11	A. Yeah, they got married, didn't they?
12	have to watch them all the time. There is stuff all	12	Q. I'm not sure of that. What did you hear about
13	over the facility. Pictures on the walls can be a	13	that?
14	weapon, glasses can be made a weapon.	14	A. Just that when she got out that they started
15	Q. Have you had any greater fear for your safety	15	dating and they got married.
16	since Director Harrigfeld became director of the	16	Q. Do you know if there is policy against that
17	Department compared to what you felt before?	17	sort of thing?
18	A. Well, there is times when kids get out of	18	A. Getting married when they get out? I don't
19	line. We had one kid come in the clinic one day and he	19	know. You shouldn't be probably finding your spouse in
20	was ticked off, and I told him to get out of there and	20	jail. But Bryce had he had been there himself.
21	he did. Just if the kids are but that has been ever	21	Q. As a juvenile?
21	he did. Just if the kids are but that has been ever		
22	since I worked there. If the kids are all doing fine,	22	A. Uh-huh, and then came there to work as a cook
		22 23	A. Uh-huh, and then came there to work as a cook and then got out and quit. I did not know anything
22	since I worked there. If the kids are all doing fine, everything is good, then it's all good. But if they are not, one of them is out of everybody is at risk, and		
22 23	since I worked there. If the kids are all doing fine, everything is good, then it's all good. But if they are	23	and then got out and quit. I did not know anything

	Page 58		Page 60
1	Q. Have you ever heard any reports or rumors of	1	Q. Did you ever hear about that sort of thing in
2	sexual or romantic relations between staff and juveniles	2	connection with an assault or a kick in the head
3	involving Katie McClain?	3	involving Sabrina McNally or Sabrina Payne, one of those
4	A. Maybe just in gossip, but nothing with	4	is her married name?
5	anybody.	5	A. I know show got kicked in the head, but I
6	Q. What did you hear about that?	6	didn't read the report. I didn't read it.
7	A. I can't remember, just that she was pretty	7	Q. Do you know what PbS or Performance-based
8	flirty with the kids.	8	Standards are?
9	Q. This would have been years ago?	9	A. Yeah.
10	A. Years ago.	10	Q. Have you ever filled out a PbS survey?
11	Q. How about with respect to Valerie Lietau? I	11	A. Yes.
12	don't know if I'm saying that right.	12	Q. Is it fair to say that since Director
13	A. Yeah. Yeah, that's right, Lietau.	13	Harrigfeld took over, there is more pressure to get
14	Q. Never heard anything about that?	14	better PbS
15	A. One of the girls in Solutions said she was	15	MS. FONTAINE: Objection; lacks foundation.
16	dating one of the kids that got out. She doesn't work	16	THE WITNESS: I don't know about that.
17	there anymore. But that she was with one of the kids	17	Q. (BY MR. SCHOPPE) Have you heard anybody
18	that got out. She was a nurse there.	18	express that they felt pressure to underreport incidents
19	Q. Do you know which juvenile?	19	or anything like that to get better PbS
20	A. Chris Thomas. I don't know if that is true or	20	A. No.
21	not.	21	MR. SCHOPPE: I think that is everything I
22	Q. How about Marcie Harris, same question?	22	have. So if you have if any questions, by all means.
23	A. Nothing. She's just silly, so no.	23 24	MS. FONTAINE: I do.
24 25	Q. "Silly" just as a professional matter orA. Yeah.	24 25	
20	A. I call.	23	
	Page 59		Page 61
1		1	
1	Q. But nothing	1	EXAMINATION
2	Q. But nothingA. Nothing with any kids, for sure.	2	EXAMINATION QUESTIONS BY MS. FONTAINE:
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	Page 62		Page 64
1	can go in there and open it up and see trainings that	1	specifically what she was referring to?
2	are coming up. Like a couple of the nurses are going to	2	A. No.
3	Tennessee in the next couple weeks, and I don't think	3	Q. Are you aware if Laura Roters ever personally
4	that was probably offered to everybody, because it was a	4	terminated anybody's employment?
5	medical conference. If it's a clinical conference, then	5	A. No. I don't think she has that power. I
6	they get the stuff about that, so it's training. I	6	don't know.
7	don't know all the training.	7	Q. Has anybody asked you to join this lawsuit?
8	Q. You don't talk to the supervisors about how	8	A. Yes.
9	they implement training for the people they supervise?	9	Q. And can you explain the circumstances of that?
10	A. No.	10	A. When it first started out and it was just this
11	Q. And you don't talk to the supervisors about	11	stuff, I was for it. I thought it was a good idea and I
12	their decisions in hiring?	12	said, Yeah, I'd be interested in getting signed up,
13	A. No.	13	whatever. But then as it got bigger and bigger, it's
14	Q. Did you ever talk to Dave Rohrbach directly	14	like it's way out of hand now. There is too much stuff.
15	and specifically about Laura Roters being hired?	15	Too much stuff against Betty I couldn't even think of
16	A. No.	16	getting involved in it.
17	Q. Did you ever talk to anyone before Tom Knoff	17	Q. And did you ever receive any kind of verbal
18	was terminated, specifically about I'm sorry.	18	warning with respect to something you had said about
19	Before Ms. Grimm left, did you ever speak to	19	somebody involved in this lawsuit?
20	anybody about why he was terminated?	20	A. I think that one time I supposedly said that
21	A. I think we all talked about what happened to	21	Deb put a hit on you, on Rhonda. But I don't remember
22	Tom, why he was gone, but we didn't know why.	22	saying it or who I said it to. If I did say it, it was
23	Q. So you didn't speak to	23	just like every other flip thing that I say when I
24	A. I didn't speak to Betty or anything about it,	24	shouldn't be saying anything.
25	no. I didn't say anything to Betty until after she	25	And Betty Grimm did call me in and asked me if
	Page 63		Page 65
1	quit.	1	I said it. I said, I don't recall. She said, Don't
2	Q. And did you talk to any supervisors	2	ever say anything like that again. I said, Okay, I
3	specifically about the reasons for Laura Roters'	3	won't. And I have not said anything since.
4	assignment?	4	Q. That was the end of it?
5	A. No.	5	A. That was the end of it. Sorry.
6	Q. It's fair to say you don't like Laura Roters.	6	MS. FONTAINE: I don't have any further
7	A. I don't like her at all, no.	7	questions.
8	Q. She stepped on your toes in your capacity as a	8	
9	nurse? Do you think she's overstepped her boundaries	9	FURTHER EXAMINATION
10	into your realm as a nurse?	10	QUESTIONS BY MR. SCHOPPE:
11	A. I think she oversteps everybody's boundaries	11	Q. Just a couple real quick. You mentioned that
12	that are doing their job at our facility. I think she	12	you heard Ms. Roters yell at kids. What did you hear
13	gets her nose into every	13	about that?
14	Q. And that really bothers you.	14	A. Not yell at them, just belittle them.
15	A. It's just the things that she's done really	15	Q. How so?
16	bother me. I've heard her belittle kids. I've heard her do all kinds of stuff.	16	A. You want to know?
17		17 18	Q. Yes.
18 19	Q. Do you have specific information as to why any of the staff shifts were changed?	18	A. All right. One day I went in the room and I
19		20	was in there cutting finger and toenails on the weekend, that was our job. She was over there telling this
20	A No		that was our job. She was over there telling this
20 21	A. No. O Do you have specific information as to why		• •
21	Q. Do you have specific information as to why	21	Mexican kid that nothing against Mexicans but that
21 22	Q. Do you have specific information as to why Lisa Littlefield was taken off	21 22	Mexican kid that nothing against Mexicans but that he could never see his mother again and he should never
21 22 23	Q. Do you have specific information as to whyLisa Littlefield was taken offA. No.	21 22 23	Mexican kid that nothing against Mexicans but that he could never see his mother again and he should never talk to his mother again, she's no good, she's a drug
21 22	Q. Do you have specific information as to why Lisa Littlefield was taken off	21 22	Mexican kid that nothing against Mexicans but that he could never see his mother again and he should never

	Page 66		Page 68
1	isn't even reality, lady. She says, Well, his mother is	1	she lift the facility, did you ever talk with her about
2	no good. And to say that to one of those kids is far	2	any of the Plaintiffs, specifically about any issues or
3	out of line.	3	problems she might have had with any of them?
4	Another time she told a kid in the kitchen,	4	A. I don't recall any really conversations that
5	that was working in the kitchen, that his dad was	5	we had about anybody like that.
6	nothing but a drunk. He'd come in there to visit drunk,	6	MR. SCHOPPE: Well, I think that about wraps
7	and he was no good. And she badgered and badgered and	7	it up. You'll have the chance to take a look at your
8	badgered the kid, trying to get the kid I don't know	8	transcript when it's ready, and you can make corrections
9	if she wanted to get knocked on her butt or if she	9	or changes. If there were a couple things you didn't
10	wanted to get some kind of reaction out of him. The	10	remember here or there, fill in the blanks, names,
11	kid's name was , I remember that. And she	11	things like that. Apart from that, I think we are
12	badgered that kid, saying his dad was an alcoholic and a	12	MS. FONTAINE: I'm sorry. One of your
13	drunk and he shouldn't have came to visit. Well, she	13	questions made me think of one more question, if you
14	shouldn't have let him in if he was drunk. It's just	14	don't mind.
15	things like that that have happened in the past that's	15	MR. SCHOPPE: Not at all.
16	not good.	16	
17	Q. Would you say that's professional conduct?	17	FURTHER EXAMINATION
18	A. Very unprofessional conduct, and yet she is a	18	QUESTIONS BY MS. FONTAINE:
19	supervisor.	19	Q. Did you speak to Betty or Sharon Harrigfeld
20	Q. Is that the sort of thing that employees would	20	about Laura Roters' treatment of juveniles?
21	get disciplined for, as far as you know?	21	A. Betty Grimm all the time, because this was
22	A. Well, yeah, they would get disciplined for	22	back when Laura was just she was just a tech, she was
23	that. You would never well, just common sense would	23	just working. And yes, I went to Betty several times.
24	tell you you wouldn't do that.	24	Betty knew.
25	Q. Do you know if Ms. Roters has ever been	25	Q. What year was that?
	Page 67		Page 69
1	Page 67 subjected to any discipline because of that?	1	Page 69 A. Boy, I don't know when she started working
1 2		1 2	A. Boy, I don't know when she started working there.
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Case 1:12-cv-00326-BLW Document 55-31 Filed 02/07/14 Page 14 of 40

	Page 70		Page 72
1	CERTIFICATE OF WITNESS	1	REPORTER'S CERTIFICATE
2	I, DARLA CRESPIN, being first duly sworn,	2	I, BEVERLY BENJAMIN CSR No. 710, Certified
3	depose and say:	3	Shorthand Reporter, certify: That the foregoing
4	That I am the witness named in the foregoing	4	proceedings were taken before me at the time and place
5	deposition, consisting of pages 1 through 72; that I	5	therein set forth, at which time the witness was put
6	have read said deposition and know the contents thereof;	6	under oath by me;
7	that the questions contained therein were propounded to	7	That the testimony and all objections made were
8	me; and that the answers contained therein are true and	8	recorded stenographically by me and transcribed by me or
9	correct, except for any changes that I may have listed	9	under my direction;
10	on the Change Sheet attached hereto:	10	That the foregoing is a true and correct record
11	DATED this day of, 20	11	of all testimony given, to the best of my ability;
12		12	I further certify that I am not a relative or
13		13	employee of any attorney or party, nor am I financially
14		14	interested in the action.
15	DARLA CRESPIN	15	IN WITNESS WHEREOF, I set my hand and seal this
16		16	9th day of October 2013.
17	SUBSCRIBED AND SWORN to before me this day	17	
18	of, 20	18	
19	·, · ·,	19	
20		20	
21	NAME OF NOTARY PUBLIC	21	BEVERLY A. BENJAMIN, CSR No. 710
22	NOTARY PUBLIC FOR	22	Notary Public
23	RESIDING AT	23	P.O. Box 2636
24	MY COMMISSION EXPIRES	24	Boise, Idaho 83701-2636
25		25	My commission expires May 28, 2019
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	Page 71		
1	ERRATA SHEET FOR DARLA CRESPIN		
2	Page Line Reason for Change		
3	ReadsShould Read		
4	Page Line Reason for Change		
5	Reads		
6	Should Read		
7	Page Line Reason for Change		
8	Reads Should Read		
9			
10	Page Line Reason for Change Reads		
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11 12	Page Line Reason for Change		
	Reads Should Read		
13 14	Should Read		
	Page Line Reason for Change		
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18	Reads		
19	Page Line Reason for Change		
20	Reads Should Read		
21			
22	Page Line Reason for Change		
23	Reads Should Read		
24	You may use another sheet if you need more room.		
25	WITNESS SIGNATURE		