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Attorneys for Defendants, Sharon Harrigfeld,  
Betty Grimm, and the Idaho Department  
of Juvenile Corrections

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; LISA  
LITTLEFIELD, an individual; ADDISON  
FORDHAM, an individual; TOM DE KNIJF, an  
individual; and FRANK FARNWORTH, an  
individual,

Plaintiffs,

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.

Case No. 1:12-cv-00326-BLW

**SECOND AFFIDAVIT OF SHARON  
HARRIGFELD IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

STATE OF IDAHO )  
 ) ss:  
County of Ada )

Sharon Harrigfeld, being first duly sworn, deposes and says as follows:

1. That, at all times relevant, I have been employed by the State of Idaho Department as the Director of the Idaho Department of Juvenile Corrections. The information contained herein is of your affiant’s own personal knowledge.

2. I reviewed the allegations of misconduct at the Nampa facility that were alleged in the First Amended Complaint. When I first read the Complaint I was surprised and concerned by the allegations of sexual misconduct by IDJC staff. With the exception of the criminal investigation involving prosecution of Julie McCormick, I had no personal knowledge of the general allegations contained in the First Amended Complaint. I was concerned that, if the allegations were factual, criminal activity may have occurred which, should be brought to the attention of law enforcement.

3. In response to the allegations in the First Amended Complaint, I requested a criminal investigation be conducted by the Idaho State Patrol and, the Criminal Division of the Idaho Attorney General’s office. Attached hereto and identified as Exhibit 1 is a true and correct copy of a letter dated August 13, 2012 which I sent to Brent Reinke, Director of the Idaho Department of Correction, Colonel Jerry Russell, Director of the Idaho State Police and, Paul Panther, Chief of the Criminal Law Division of the Idaho Attorney General’s office.

4. After I requested an investigation, members of the Idaho State Patrol interviewed

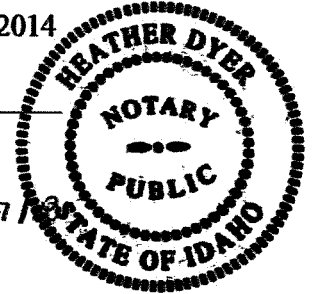
various employees of the IDJC, including myself. A report was generated by ISP summarizing its investigations. No criminal charges were or filed against any IDJC employee.

FURTHER your Affiant saith naught.

*Sharon Harrigfeld*  
Sharon Harrigfeld

SUBSCRIBED AND SWORN to before me this 19 day of February, 2014

*AD*  
Notary Public for Idaho  
Residing at ADA COUNTY  
My Commission Expires: 6/27/14

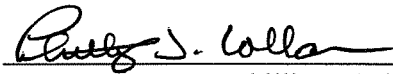


CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 20 day of February, 2014, I served a true and correct copy of the foregoing **SECOND AFFIDAVIT OF SHARON HARRIGFELD** by delivering the same to each of the following attorneys of record, by the method indicated below, addressed as follows:

Andrew T. Schoppe  
LAW OFFICE OF ANDREW T.  
SCHOPPE  
910 W. Main Street, Ste 358  
Boise, ID 83702  
Telephone: (208) 450-3797  
Fax: (208) 392-1607

U.S. Mail, postage prepaid  
 Hand-Delivered  
 Overnight Mail  
 Facsimile  
 ECF



\_\_\_\_\_  
Phillip J. Collaer

# EXHIBIT 1



# Idaho Department of Juvenile Corrections

954 W. Jefferson Street P.O. Box 83720 Boise, ID 83720-0285 Phone: (208) 334-5100 Fax: (208) 334-5120

Telecommunications Relay Service (TRS) 1 800 377-3529

C.L. "BUTCH" OTTER  
Governor

SHARON HARRIGFIELD  
Director

August 13, 2012

Brent Reinke  
Director, Idaho Department of Correction  
1299 N. Orchard Avenue, # 110  
Boise ID 83720

Colonel G. Jerry Russell  
Director, Idaho State Police  
700 South Stratford Drive  
Meridian, ID 84642

Paul R. Panther  
Chief, Criminal Law Division  
Idaho Attorney General's Office  
700 W. State Street  
Boise ID 83720-0010

RE: Request for investigative assistance re allegations in  
Rhonda Ledford, et al. v. Idaho Department of Juvenile Corrections.  
No. 1:12-cv-000326-BLW, U.S. District Court of Idaho.

Dear Director Reinke, Colonel Russell and Mr. Panther:

As you know, the above-referenced lawsuit has been filed against the Idaho Department of Juvenile Corrections ("IDJC"). Serious allegations have been made about the operations and staff behavior at the Juvenile Corrections Center in Nampa. These allegations are set forth in the 1<sup>st</sup> Amended Complaint filed in the above case.

At this time, IDJC is making the following requests to your agencies:

- (1) Idaho State Police ("ISP"): We request that ISP conduct a criminal investigation of the allegations of criminal activity set forth in the 1<sup>st</sup> Amended Complaint;
- (2) Idaho Department of Correction ("IDOC"): We request that IDOC assign an investigator from the IDOC's Office of Performance Standards ("OPS") to assist in conducting a formal administrative investigation of the allegations of non-criminal conduct; and

(3) Office of the Attorney General: We request that the Criminal Law Division of the Office of the Attorney General supervise the administrative portion of the investigation to ensure its independence and objectivity.

We would like these investigations to begin as soon as possible. We contemplate that the investigation would proceed in the following manner.

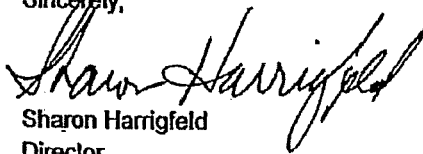
ISP will conduct an independent investigation of those allegations in the 1<sup>st</sup> Amended Complaint which appear to involve activity which is criminal in nature. If ISP discovers evidence of criminal activity, ISP will report the results of its investigation directly to the appropriate county prosecuting attorney. This investigation will be completely separate and independent of the IDJC.

At the same time, on behalf of IDJC, the Chief of the Criminal Division of the Office of the Attorney General ("Division Chief") will oversee an administrative investigation of personnel - related issues such as employee misconduct and policy violations. The OPS investigator will conduct this portion of the investigation and report directly to the Division Chief. The investigation results will be forwarded to the Director of IDJC after review by the Division Chief. The Division Chief will report any potential criminal activity of which he becomes aware to ISP. The Office of the Attorney General will not make charging recommendations regarding criminal matters.

If you are agreeable to this request, please let me know as soon as possible. I can be reached by emailing [sharon.harrigfeld@idjc.idaho.gov](mailto:sharon.harrigfeld@idjc.idaho.gov) or by calling direct 577-5404.

Thank you for your assistance.

Sincerely,



Sharon Harrigfeld  
Director

cc: David Hensley  
Office of the Governor