

# EXHIBIT 2

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, ) Case No.

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. )

DEPOSITION OF BETTY GRIMM SEPTEMBER 13, 2013

REPORTED BY:

BEVERLY A. BENJAMIN, CSR No. 710, RPR

Notary Public

1 THE DEPOSITION OF BETTY GRIMM was taken on 2 behalf of the Plaintiffs, at Anderson, Julian & Hull, 3 250 South Fifth Street, Suite 700, Boise, Idaho, 4 commencing at 9:07 a.m. on September 13, 2013, before 5 Beverly A. Benjamin, Certified Shorthand Reporter and 6 Notary Public within and for the State of Idaho, in the 7 above-entitled matter.

APPEARANCES:

8 For the Plaintiffs:

9 Law Office of Andrew T. Schoppe, PLLC 10 BY MR. ANDREW T. SCHOPPE 11 910 W. Main Street, Suite 358 12 Boise, Idaho 83702-5796 13

14 For the Defendants Idaho Department of Juvenile 15 Corrections, Sharon Harrigfeld, and Betty Grimm: 16

17 Anderson, Julian & Hull, LLP 18 BY MR. PHILLIP J. COLLAER 19 C. W. Moore Plaza 20 250 South 5th Street, Suite 700

21 P.O. Box 7426

22 Boise, Idaho 83707-7426 23

24 Also Present: Rhonda Ledford, Nancy Bishop, Sharon 25 Harrigfeld, Glen Goff, Shane Penrod

1 INDEX 2 TESTIMONY OF BETTY GRIMM PAGE 3 Examination by Mr. Schoppe 4

5 EXHIBITS 6 NO. DESCRIPTION PAGE 7 136 - E-mail chain ending from Julie Cloud 82 8 to Sharon Harrigfeld, 7/12/12, 9 Subject: RE: Nampa 10 137 - E-mail from Betty Grimm to Julie 206 11 Cloud, 6/6/2011, Subject: Ledford 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 BETTY GRIMM, 2 first duly sworn to tell the truth relating to said 3 cause, testified as follows: 4

EXAMINATION

5 QUESTIONS BY MR. SCHOPPE:

6 Q. Good morning. Thank you very much for coming. 7 My name is Andrew Schoppe. 8

9 Have you ever had your deposition taken 10 before? 11

12 A. Many, many years ago. 13

14 Q. What was that about? 15

16 A. I was a registered nurse for Maury Regional 17 Hospital in Columbia, Tennessee, and there was an 18 insurance issue. 19

20 Q. Since you've worked at the Idaho Department of 21 Juvenile Corrections have you ever had your deposition 22 taken? 23

24 A. No. 25

Q. Have you ever offered an affidavit in support of any case or claim involving the Department?

A. No.

Q. Have you had a chance to prepare for this deposition here today?

A. I have.

1 Q. Without telling me what you talked about with  
 2 your attorney, because I don't want to know about  
 3 anything you spoke about with your attorney, have you  
 4 had a chance to consult with him about how this will  
 5 work?  
 6 A. I have.  
 7 Q. Do you understand that you have the duty today  
 8 to tell me the truth just as if you were testifying in a  
 9 court of law?  
 10 A. Right.  
 11 Q. As far as your ability to testify today, is  
 12 there any reason why you wouldn't be able to offer your  
 13 best testimony; for example, you are not high or on  
 14 drugs or drunk or anything like that?  
 15 A. I don't believe so.  
 16 Q. Any prescription medications that might  
 17 interfere with your ability to do that?  
 18 A. No.  
 19 Q. I don't mean to imply that you are high or  
 20 anything, but that is how I try to be lighthearted about  
 21 that kind of question.  
 22 So today I'm going to ask you questions, and  
 23 in responding, I'm entitled to your best answer. I'm  
 24 going to be asking you about everything you know, what  
 25 you may have seen, heard, even if you heard it from a

1 third party, you can just tell me that, and tell me  
 2 where you might have heard something. Does that make  
 3 sense to you?  
 4 A. Okay.  
 5 Q. Any time any of my questions don't make sense  
 6 to you or are confusing or anything like that, you can  
 7 absolutely ask me to clarify or restate the question,  
 8 whatever you like.  
 9 A. All right.  
 10 Q. If you need a break, feel free to ask for one,  
 11 so long as you've answered the question that I've asked.  
 12 A. Thank you.  
 13 Q. Tell me a little bit about your background. I  
 14 take it you are from Tennessee?  
 15 A. Yes, sir, I am.  
 16 Q. Did you grow up in Tennessee?  
 17 A. I did.  
 18 Q. Go to high school there?  
 19 A. I did.  
 20 Q. Whereabouts?  
 21 A. St. Bernard Academy. It was a Catholic  
 22 private all-girls high school. I received my diploma in  
 23 1965.  
 24 Q. What did you do after high school?  
 25 A. I went to work right after high school. My

1 father had a friend who hired me to work for National  
 2 Life and Accident Insurance Company. I started out  
 3 filing, from there I moved up to check writing.  
 4 Q. And eventually you went to college, I take it?  
 5 A. That was much later. I don't know if you want  
 6 me to start now kind of walking you through.  
 7 I married in 1967. I had a child 11 months  
 8 later, and I quit working to raise this child. I had a  
 9 second child about a year later. And after not quite  
 10 four years of marriage, my children's father decided he  
 11 did not want to be married any longer and did not want  
 12 the responsibility of children, so he left. I filed for  
 13 divorce. In the state of Tennessee you have to wait a  
 14 year for the divorce to be granted if you have children.  
 15 During that time I went back to work to  
 16 support my two children. And I went to work for Third  
 17 National Bank, and I worked there about two, almost  
 18 three years, remarried, had a third and fourth child.  
 19 And during that time I did not go back to work.  
 20 In 1977 my second husband and I were living in  
 21 Columbia, Tennessee, and I had always wanted to go into  
 22 the medical field. I was the oldest of eight children,  
 23 five of which were my brothers. Back in those days, it  
 24 was felt that it was more important for men to have a  
 25 college education than women.

1 Back to Columbia, Tennessee, I learned that  
 2 the hospital there, Maury Regional Hospital, was  
 3 offering a class for certification as nursing  
 4 assistants. My youngest child was in either daycare or  
 5 kindergarten, I can't remember which, but I applied, was  
 6 accepted into the class, completed their course, passed  
 7 the exam. And I worked for Maury Regional Hospital from  
 8 1977 until 1985 as a nursing assistant.  
 9 It was during that time that I went to  
 10 Columbia State Community College and started taking  
 11 college courses. It was a long drawn out process  
 12 because, as I told you, Andy, I had four children. I  
 13 had a home, a family, and a job, and so college was a  
 14 slow course. Once I completed all the prerequisites, I  
 15 was approached by a physician offering to send me to  
 16 college to get my nursing degree, and in exchange he  
 17 wanted me to work for him. I did not want to be  
 18 obligated, if you will.  
 19 The hospital had an auxiliary that awarded two  
 20 scholarships a year. I applied for a scholarship and I  
 21 was awarded scholarship. And I went to Columbia State  
 22 Community College, got my associate's degree in nursing,  
 23 graduated in 1985, took the state board that same year,  
 24 passed the state board, and obtained my registered nurse  
 25 license.

1 Q. Good for you.  
 2 A. I continued to work for Maury Regional  
 3 Hospital that first year as a staff nurse on the  
 4 orthopedic unit, which is where I had spent that entire  
 5 time. A year after I graduated from college the nurse  
 6 manager on that unit resigned, I applied for the  
 7 position and was promoted to nurse manager of the  
 8 orthopedic unit at Maury Regional. I held that position  
 9 for about four, four and a half years, until I  
 10 remarried.  
 11 I married Niles Grimm in 1990. Niles was  
 12 working for Morrison-Knudsen. And a month after we  
 13 married, Morrison-Knudsen sent us to Tacoma, Washington,  
 14 where my husband oversaw the building of a plant for  
 15 Boeing.  
 16 When I got to Tacoma, Washington I applied at  
 17 a hospital. I wasn't familiar with Washington or what  
 18 hospitals were there. I applied with American Lake VA,  
 19 I was offered a position as their charge nurse on their  
 20 medical unit and I accepted that position, and I worked  
 21 for the American Lake VA for three years.  
 22 At the end of the three years, my husband's  
 23 plant, the Boeing plant, had been completed and  
 24 Morrison-Knudsen wanted to send him to Moraine, Ohio,  
 25 back East where I just came from, to build a plant for

1 General Motors Trucking. My husband and I talked about  
 2 the fact that it was very expensive to train new RNs, I  
 3 did not want to traipse all over the United States, I  
 4 didn't want my resume to look like Swiss cheese.  
 5 Niles is from Idaho, I had been to Idaho with  
 6 him several times, loved the state, the things that it  
 7 had to offer. And so the decision was made that he  
 8 would go to Moraine, Ohio and oversee the building of  
 9 that trucking plant and I applied with Saint Alphonsus,  
 10 St. Luke's, and the State of Idaho. Both St. Luke's and  
 11 Saint Al's brought me over to Idaho to tour and  
 12 interview. The State of Idaho I had to -- in the  
 13 application process I got a letter from the State of  
 14 Idaho saying where I had ranked on the registry, but  
 15 they didn't have any current openings.  
 16 Both St. Luke's and Saint Al's offered me  
 17 positions. I accepted the position with Saint Al's  
 18 because their position was a charge position on their  
 19 rehab unit, and rehab was very closely related to what I  
 20 felt was my expertise, which was orthopedics, they kind  
 21 of go hand in hand.  
 22 While I was working for Saint Alphonsus -- and  
 23 Andy, I can't remember how long it was, seven, eight  
 24 months -- I got a call one day from a gentleman that  
 25 identified himself as the human resource officer for

1 Health and Welfare. They were interviewing for nursing  
 2 positions for a facility that was going to open in  
 3 Nampa, and I was number one on the register and they  
 4 wanted to interview me. I accepted the interview, not  
 5 because I wanted to leave Saint Al's, but I thought it  
 6 was good manners, after all, I did apply.  
 7 So I interviewed before a panel of people, and  
 8 they were talking about Juvenile Corrections and, you  
 9 know, I told them I didn't have any experience in  
 10 corrections. My expertise was in orthopedics, generally  
 11 geriatric, older people. Two days later I got a phone  
 12 call offering me a position and I accepted that  
 13 position, came to work for the Department -- well, it  
 14 was under Health and Welfare at the time, in May of  
 15 1994, as a staff nurse.  
 16 Q. What year did you move to Idaho?  
 17 A. Well, between '93, '94.  
 18 Q. What was your maiden name when you first  
 19 started --  
 20 A. Before I ever got married?  
 21 Q. Yes.  
 22 A. Elizabeth Ryan Howington, H-o-w-i-n-g-t-o-n.  
 23 Q. In addition to being an RN do you have any  
 24 other certifications or licenses or anything like that?  
 25 A. I did, but, Andy, I don't know if they are

1 still current. My first year as an RN I took a  
 2 certification under a board certified cardiologist and  
 3 was certified in basic life support, which meant that I  
 4 would assist physicians in life-threatening situations.  
 5 That same year I went ahead and went further and  
 6 received certification in what was called acute care  
 7 life support, which meant that I could read your heart  
 8 rhythm, I could get things going before the doctor got  
 9 there.  
 10 Q. Have you kept your RN license current?  
 11 A. Yes, it's still current.  
 12 Q. How about in the context of your work with the  
 13 Department of Juvenile Corrections, do you have any  
 14 licenses that may not be related to your license as an  
 15 RN?  
 16 A. No.  
 17 Q. Any certifications in any kind of, for  
 18 example, appropriate use of force or anything like that?  
 19 A. No.  
 20 Q. Any special training in, anything from  
 21 corrections, in particular like POST training or  
 22 management training or anything to do with supervision  
 23 of juveniles?  
 24 A. Goodness, over the years there were certain  
 25 trainings that even as the nurse manager that I was

1 required to take, that included first aid, CPR. Andy, I  
 2 can't remember all of them. There was a lot. I was not  
 3 required to be POST certified. Before the Department  
 4 went to appropriate use of force there was another --  
 5 what was it called? I can't remember. I took that  
 6 course, it was a hands-on physical training on how to  
 7 restrain a juvenile, but I can't remember the name of  
 8 it. Aikido. But again --  
 9 **Q.** When you say, "aikido," you mean the Okinawan  
 10 martial art?  
 11 **A.** Kind of like that, yeah.  
 12 But I was not required as a nurse manager or a  
 13 superintendent to take the aikido or the appropriate use  
 14 of force. I took aikido because I wanted to understand  
 15 it.  
 16 **Q.** Sure.  
 17 So you indicated that you started off as a  
 18 staff nurse?  
 19 **A.** Right.  
 20 **Q.** How long did you work as a staff nurse?  
 21 **MR. COLLAER:** Are you talking about at  
 22 **Juvenile Corrections?**  
 23 **MR. SCHOPPE:** At **Juvenile Corrections.**  
 24 **MR. COLLAER:** Okay.  
 25 **THE WITNESS:** What I recall is I went from

1 **Q.** Was that a position that was open to any  
 2 applicant?  
 3 **A.** Right.  
 4 **Q.** Anybody else apply, that you remember?  
 5 **A.** Yes, sir.  
 6 **Q.** Was there an interview process?  
 7 **A.** Yes, sir.  
 8 **Q.** Who interviewed you?  
 9 **A.** The superintendent, the human resource  
 10 officer. I don't remember who else, I'm sorry.  
 11 **Q.** Who was the superintendent at the time you  
 12 started?  
 13 **A.** Larry Callicutt.  
 14 **Q.** Do you recall who the human resource officer  
 15 was?  
 16 **A.** I can see his face, but I can't remember his  
 17 name.  
 18 **Q.** Is it someone who still works there?  
 19 **A.** No.  
 20 **Q.** Then how about when you were promoted to nurse  
 21 manager, did you apply for that position?  
 22 **A.** Nurse manager, no, sir.  
 23 **Q.** How did that work?  
 24 **A.** I was approached by the director of the  
 25 Department, who at the time, like I said, was Brent

1 **being a staff nurse to being a lead nurse, from the lead**  
 2 **nurse I became the nursing supervisor. And I can't, I**  
 3 **just cannot remember the years, Andy. I'm sure it's in**  
 4 **my personnel file. I was appointed nurse manager by the**  
 5 **director of the Department, who at the time was Brent**  
 6 **Reinke. And again, I don't remember what year that was.**  
 7 **I just don't.**  
 8 **Q.** (BY MR. SCHOPPE) That's all right. If it  
 9 pops into your head later, feel free to let me know.  
 10 Generally speaking, so you started in May of  
 11 1994 at Juvenile Corrections; is that right?  
 12 **A.** Yes.  
 13 **Q.** So this would have been late '90s or early  
 14 2000s perhaps?  
 15 **MR. COLLAER:** If you know. If you don't, you  
 16 **don't.**  
 17 **THE WITNESS:** I don't know, I just don't.  
 18 **Q.** (BY MR. SCHOPPE) That's all right.  
 19 **A.** You know, you're talking about 18 1/2 years.  
 20 I just, I don't know.  
 21 **Q.** I understand.  
 22 When you transitioned from staff nurse to lead  
 23 nurse, how did that work; did you apply for the  
 24 position?  
 25 **A.** I did.

1 Reinke, and he told me that he was going to appoint me  
 2 as the nurse manager. He explained to me what his  
 3 expectations were.  
 4 **Q.** Do you know if that position was opened to  
 5 other applicants?  
 6 **A.** I don't believe so.  
 7 **Q.** Do you know why that was?  
 8 **MR. COLLAER:** Object to the form of the  
 9 **question; calls for speculation.**  
 10 **THE WITNESS:** I don't know. I know that at  
 11 **the time Nampa was considered the hub. And at the time**  
 12 **we just had the two facilities. I think I'm telling**  
 13 **this right.**  
 14 **Q.** (BY MR. SCHOPPE) Now, when you say Nampa was  
 15 the hub, you mean the Juvenile Corrections Center in  
 16 Nampa?  
 17 **A.** Right.  
 18 **Q.** I'll probably call that JCC-Nampa.  
 19 **A.** Yes.  
 20 And I believe at the time there was the plan  
 21 for building a facility in the northern part of the  
 22 state, JCC-Lewiston, but it wasn't in place at the time  
 23 that I was appointed as the nurse manager. There was  
 24 just simply JCC-Nampa and JCC-St. Anthony.  
 25 **Q.** When you say Nampa was "the hub," what do you



1 mean by that?  
 2 A. Well, it was where headquarters was, it was  
 3 where the majority of the juveniles that were committed  
 4 were coming out of the counties in that region. And  
 5 that's the best answer I can give you.  
 6 Q. That's all I ever want, your best answer.  
 7 The other facility at that time was JCC-  
 8 St. Anthony?  
 9 A. Right.  
 10 Q. At some point during your employment with  
 11 Juvenile Corrections, did the Department transition from  
 12 being part of Health and Welfare to being a freestanding  
 13 department?  
 14 A. They did, early on. I don't think I had been  
 15 working for them six, eight months until it transitioned  
 16 from Health and Welfare to its own department.  
 17 Q. Do you know why that happened?  
 18 A. No, sir, I don't.  
 19 Q. How long did you work as a nurse manager?  
 20 A. Before becoming superintendent?  
 21 Q. Yes.  
 22 A. Four years, five years. A while.  
 23 Q. While you were a nurse manager did you have  
 24 employees that you supervised?  
 25 A. I did.

1 Q. Who were they?  
 2 A. As the nurse manager, I supervised the nursing  
 3 staff at Nampa, I supervised the other two RNs, the RN  
 4 supervisor at St. Anthony and the RN supervisor at  
 5 Lewiston, and I had some oversight over their nursing  
 6 staff as well.  
 7 Q. So your supervisory responsibilities weren't  
 8 just confined to the Nampa facility?  
 9 A. No, sir.  
 10 Q. Who did you report to?  
 11 A. Both the superintendent at Nampa and the  
 12 director of the Department.  
 13 Q. While you were nurse manager was that still  
 14 Director Reinke and Superintendent Callicut?  
 15 A. There was another superintendent. Larry  
 16 Callicut was the original superintendent at Nampa, and  
 17 Larry left that position to take another position. And  
 18 during that interim there was another superintendent  
 19 whose name was Jerry Riley. I worked under Jerry for a  
 20 year or two, and Mr. Riley resigned and Larry Callicut  
 21 came back. And again, when it comes to years and dates,  
 22 I just...  
 23 Q. That's okay, just do your best.  
 24 A. I just, you know...  
 25 Q. Do you know why Jerry Riley resigned?

1 A. Resigned?  
 2 Q. Yes.  
 3 A. No, I don't.  
 4 Q. Did anyone ever tell you why he resigned?  
 5 A. Well, I'm under oath, so I'm going to tell you  
 6 this, I knew that there were concerns regarding his  
 7 performance or lack of performance. Mr. Riley left the  
 8 facility quite often, including during times of issues.  
 9 And quite often he would leave abruptly and he would  
 10 leave me in charge.  
 11 Q. Who was it that told you the performance  
 12 issues were the reason for his resignation?  
 13 **MR. COLLAER: Object that that misstates her**  
 14 **testimony. She never said that. But go ahead and**  
 15 **answer. If anybody told you that, go ahead and answer**  
 16 **it.**  
 17 **THE WITNESS: All I can tell you is that I got**  
 18 **a call from Director Reinke. It is my belief to this**  
 19 **day that he understood the strain that I was under.**  
 20 Q. (BY MR. SCHOPPE) Director Reinke?  
 21 A. Yes.  
 22 I received a phone call and he told me to  
 23 please bear with him, to not leave him, which I hadn't  
 24 planned to do. And it was shortly after that that  
 25 Mr. Riley's resignation was announced. That's all I

1 know. I was not privy to anything more than that.  
 2 Q. With respect to the performance issues that  
 3 you spoke about, who was it that told you about those?  
 4 A. The director of the Department.  
 5 Q. That was during that phone call or one of the  
 6 those phone calls?  
 7 A. A couple phone calls.  
 8 Q. What was it that you found yourself having to  
 9 do when Mr. Riley would leave?  
 10 A. Well, I distinctly remember a situation where  
 11 the locks malfunctioned in the Choices unit or -- well,  
 12 anyway a unit. Which meant that security wasn't in  
 13 place. And the next thing I know, Mr. Riley comes to  
 14 me, hands me his pager and his keys and he leaves. I  
 15 worked with staff best I could that day, I spent the  
 16 night in the facility for extra security, because the  
 17 kids could come and go out of those rooms and go  
 18 anywhere, and you couldn't have that.  
 19 Q. How was it that the juveniles could go  
 20 anywhere?  
 21 A. Well, within the building.  
 22 Q. Okay.  
 23 A. Within the building. It was a locked  
 24 facility, but if you could come out of your room, you  
 25 could very well walk down this hall, go to this other

1 hall or wherever.  
 2 Q. Were there portholes or anything like that  
 3 that would separate parts of the facility?  
 4 A. There were halls. There were halls.  
 5 Because the doors could not be secured, you  
 6 could have a juvenile go into another juvenile's room.  
 7 Q. Why couldn't the doors be secured?  
 8 A. There was some kind of malfunction. I really  
 9 don't understand lock and key stuff.  
 10 Q. Was that just a temporary condition?  
 11 A. It was. It was repaired.  
 12 Q. You said that was a couple years that you  
 13 worked under Mr. Riley; is that right?  
 14 A. Right.  
 15 Q. Then Mr. Callicutt came back?  
 16 A. Right.  
 17 Q. Did you know why or did anyone tell you why he  
 18 came back?  
 19 A. No.  
 20 Q. Do you know where he had been?  
 21 A. He was with the Department, but he -- I don't  
 22 remember what he did. It had something to do with  
 23 placement, juvenile placement.  
 24 Q. When he came back do you know if he  
 25 interviewed for the position?

1 A. No, I don't.  
 2 Q. Do you know if the position was opened up to  
 3 the world in general?  
 4 A. I don't know.  
 5 Q. Then how many more years did Mr. Callicutt act  
 6 as superintendent?  
 7 A. Until I became superintendent. How many  
 8 years? Four, five, something like that.  
 9 Q. Tell me about how it is you came to be  
 10 superintendent. When did the position become available?  
 11 A. 2008, I believe. I could be wrong.  
 12 Q. Did Mr. Callicutt resign or was he terminated;  
 13 what happened?  
 14 A. No. Mr. Callicutt -- I had been back in  
 15 Tennessee in December for Christmas, and when I  
 16 returned, Mr. Callicutt came to me and told me that the  
 17 Governor was going to be moving Director Reinke from  
 18 Juvenile Corrections to Adult Corrections, and Larry  
 19 told me that he was going to apply for the position as  
 20 director of Juvenile Corrections.  
 21 He did apply. I'm assuming there was an  
 22 interview process. He was selected. During that  
 23 interim I was the acting superintendent at Nampa. It  
 24 was during that time that I was approached by Director  
 25 Callicutt. I was first approached about applying for

1 the position as superintendent at JCC-Lewiston, and I  
 2 was more than fine with that option because I spent a  
 3 lot of time at the Lewiston facility; I was a part of  
 4 the planning committee for that facility, I hired their  
 5 nurses, I trained their nurses. Because of the amount  
 6 of time I spent at Lewiston, I became very familiar with  
 7 their program, which is called Milestone program. It's  
 8 a small facility, only 36 beds, and I felt that if I was  
 9 going to consider being a superintendent, it would  
 10 probably be best to start out small.  
 11 Plus, at the same time my husband and I had  
 12 bought property, acreage, with the plan to build a home  
 13 in Grangeville and Lewiston is a 45-minute drive from  
 14 Grangeville.  
 15 So I applied, submitted my application,  
 16 submitted my resume, and then Director -- he was  
 17 director by that time, I was still the acting  
 18 superintendent at Nampa -- Superintendent Callicutt met  
 19 with me on several occasions because what he had wanted  
 20 to do was to bring Superintendent Bernatz from the  
 21 Lewiston facility to the Nampa facility. And  
 22 Superintendent Bernatz declined to come to Nampa.  
 23 Q. Is that Kevin Bernatz?  
 24 A. Yes.  
 25 And so Mr. Callicutt said, I want you to take

1 Nampa. And I agreed.  
 2 Q. Do you know if anyone else applied for the  
 3 position?  
 4 A. I do not.  
 5 Q. Do you know if that position was open to other  
 6 applicants?  
 7 A. I honestly can't say that I remember seeing an  
 8 announcement go out.  
 9 Q. Did you through an interview process?  
 10 A. Just with the Director.  
 11 Q. No panel or anything like that?  
 12 A. No.  
 13 Q. So it was 2008 when you started; is that  
 14 right?  
 15 A. I think.  
 16 **MR. COLLAER: Your best recollection is all**  
 17 **you can do. Don't guess, just tell him what you do or**  
 18 **don't know.**  
 19 **THE WITNESS: Okay.**  
 20 Q. (BY MR. SCHOPPE) What was your job  
 21 description as the superintendent of the JCC-Nampa  
 22 facility?  
 23 A. I was held responsible and accountable for the  
 24 safety and well-being of the juveniles and the staff.  
 25 Q. When you say you were "held responsible and

1 accountable," who was it that held you responsible and  
2 accountable?

3 A. My supervisor, which would have been the  
4 director.

5 Q. Did you have a written job description or  
6 anything like that?

7 A. I do recall reading the job description for  
8 superintendent. But if you're going to ask me what that  
9 said, I can't remember.

10 Q. With respect to that particular facility, was  
11 there anybody who was more responsible or accountable  
12 than you for the safety and security of the juveniles  
13 and staff?

14 **MR. COLLAER: Object to the form of the**  
15 **question; it's vague.**

16 **THE WITNESS: Do you want me to answer?**

17 Q. (BY MR. SCHOPPE) Yes.

18 A. Everyone was.

19 Q. Everyone was more responsible than you?

20 A. No, not more. Everyone was responsible and  
21 accountable.

22 Q. How do you mean?

23 A. For safety and well-being of the children that  
24 we served.

25 Q. How do you mean that?

1 A. How do I mean that? Safety and security was  
2 first and foremost. The staff were trained to work with  
3 and how to work with the children. They were expected  
4 to have eyes on, to intervene appropriately, as quickly  
5 as possible, to prevent a situation from getting out of  
6 control. That's my best answer, Andy.

7 Q. As part of your duties, was it your duty to  
8 ensure that all of the employees were acting for the  
9 safety and security of the juveniles and other staff?

10 A. Right.

11 Q. So I guess my first question was, we didn't  
12 quite get there on the answer: Was there anyone more  
13 responsible than you at that facility for safety and  
14 security?

15 **MR. COLLAER: Objection; that has been asked**  
16 **and answered. But go ahead and answer it again.**

17 **THE WITNESS: Not more than.**

18 Q. (BY MR. SCHOPPE) You are the top dog; is that  
19 right?

20 A. At the facility.

21 Q. I understand.

22 Do you know if your job description was  
23 derived from the Idaho Juvenile Corrections Act?

24 A. I'm sure it was.

25 Q. Have you ever read the Juvenile Corrections

1 Act?

2 A. I certainly have.

3 Q. You have?

4 A. I have.

5 Q. Recently or when did you read that?

6 A. It's been a while, good while.

7 Q. Was it something that you referred to often  
8 during your work at the facility?

9 A. I referred to that, I referred to juvenile  
10 rights, I referred to CRIPA. I mean, I referred to my  
11 support systems, which would have been our Department's  
12 director, our Department's legal people, our  
13 Department's human resources people.

14 Q. Did you ever receive any training or classes  
15 or anything like that on the legal aspects of operating  
16 the facility?

17 A. I recall attending classes throughout my time  
18 with the Department. These were classes that were held  
19 by our legal people, and they covered juvenile rights  
20 and CRIPA and all of that. Was I required as a new  
21 superintendent to attend something? No, I wasn't.

22 Q. But you did attend those classes?

23 A. Yes.

24 Q. How about PREA?

25 A. Oh, yes.

1 Q. As the superintendent of the JCC-Nampa  
2 facility was it your job to ensure the facility complied  
3 with those provision of the law, PREA, CRIPA, Juvenile  
4 Corrections Act?

5 A. Yes, sir.

6 Q. In that facility was there anyone more  
7 responsible than you for ensuring compliance with those  
8 things?

9 A. Yes, there was. Each of our state facilities  
10 had a PREA coordinator. And that PREA coordinator had  
11 more extensive training than even the superintendent or  
12 staff on how to conduct the interviews if there was a  
13 PREA concern, following up, completing the documentation  
14 that was required, and reporting to the statewide PREA  
15 coordinator who worked at headquarters.

16 Q. Who was the PREA coordinator while you were  
17 superintendent?

18 A. I don't remember. I can't remember. I  
19 remember whoever it was first left, and Eric Cotton was  
20 trained and took over as the PREA coordinator and he  
21 gave that up, and I believe just before I retired Ashley  
22 Jorgensen was taking it on. I could be wrong though,  
23 please.

24 Q. Just your best effort. You'll have a chance  
25 to review your deposition transcript later and make any



Page 29

1 corrections, fill in any blanks, things like that.  
 2 Is that its own job or is that just a duty  
 3 that --  
 4 A. No, it's a duty assigned to their other  
 5 duties. It's something additional that they do.  
 6 Q. What did Mr. Cotton do?  
 7 A. He was a group leader in the Choices program.  
 8 He was the group leader for the juveniles in the C pod.  
 9 Q. How about Ms. Jorgensen?  
 10 A. She was, at the time that she took over PREA,  
 11 she was the program manager at Nampa.  
 12 Q. What does the program manager do?  
 13 A. Well, sir, they have oversight of the  
 14 programs.  
 15 Q. By "programs," what do you mean?  
 16 A. Well, there is a program on the co-occurring  
 17 unit, I can't recall what all that entailed. And there  
 18 was a program in the Choices program, and I can't recall  
 19 what all it entailed other than there were -- I can't  
 20 recall. Both units had programs. Part of the program,  
 21 there was drug and alcohol classes, there was anger  
 22 management classes, there was group meetings, there  
 23 was -- I don't know what all.  
 24 Q. Who made the decision as to what programs  
 25 which juveniles would go into?

Page 31

1 A. Not that I'm aware of.  
 2 Q. How about to the Custody Review Board?  
 3 A. The Custody Review Board, my recollection, was  
 4 held I don't remember how often, but any juvenile that  
 5 had reached the age of -- is it 19? I think -- 19 that  
 6 were still in our custody, they would go before the  
 7 Custody Review Board. Their group leader or their JSC  
 8 would report to the board on the juvenile's progress or  
 9 lack of progress, and the Review Board would then submit  
 10 their recommendations to the Department.  
 11 Q. Going back to the legal training we discussed  
 12 earlier, you had talked about juvenile rights. What  
 13 kind of rights of juveniles were you referring to?  
 14 A. That they be treated with respect, that they  
 15 would not be confined or isolated without cause, that  
 16 their basic needs would be met. Those kind of things,  
 17 Andy.  
 18 Q. Were you ever trained or educated in reporting  
 19 of child abuse or neglect to the Department of Health  
 20 and Welfare?  
 21 A. Yes.  
 22 Q. What was your training there?  
 23 A. It was done by our legal staff, and that we  
 24 were trained that when a child disclosed, by law you  
 25 were obligated to notify Health and Welfare. There was

Page 30

1 A. That was a decision reached by a group of  
 2 people following the juvenile staffing. A staffing was  
 3 the word used for a meeting that was attended by the  
 4 juvenile, an O&A clinician, the juvenile's parents, the  
 5 juvenile's probation officer, the juvenile's juvenile  
 6 service coordinator that was assigned upon his  
 7 commitment, which was an IDJC staff, and that staffing  
 8 was led by a clinical supervisor.  
 9 At that meeting the risks and needs of the  
 10 juvenile were brought forward and a decision was made at  
 11 that time of the most appropriate placement. A referral  
 12 would be made to that placement, the juvenile would  
 13 remain in O&A at Nampa until the referral was either  
 14 accepted or denied. If the referral was denied, then  
 15 this treatment team that I've just talked to you about  
 16 would look at other options and continue to make  
 17 referrals.  
 18 Q. Who was in charge of accepting or denying  
 19 those referrals?  
 20 A. Clinical supervisors, program directors, or  
 21 contract providers.  
 22 Q. Did the courts have any role in that process?  
 23 A. No.  
 24 Q. Were any reports concerning program  
 25 assignments made to the courts, juvenile courts?

Page 32

1 a certain amount of documentation that the person  
 2 receiving disclosure completed. And that documentation  
 3 was then forwarded to the superintendent, and I believe  
 4 that documentation then went into the juvenile's record.  
 5 Q. How were those incidents reported?  
 6 A. I'm not sure I understand what you're asking,  
 7 "how."  
 8 Q. Is there a form or was there a process; was  
 9 this the same as like a PbS survey or a PREA incident  
 10 report?  
 11 A. I'm a staff and I'm working with you as a  
 12 juvenile and when you tell me that your uncle molested  
 13 you, okay, I'm obligated to report that. Does that  
 14 help?  
 15 Q. Sure.  
 16 Was there a mechanism that you would use to  
 17 report that, a special form or anything like that, or an  
 18 incident report?  
 19 A. The staff all knew there would be an incident  
 20 report. There was another form, and I can't remember  
 21 what it was called, but it was a form where the staff  
 22 would document on that form who all they notified of the  
 23 disclosure.  
 24 Q. Then that form you indicated went to the  
 25 superintendent; is that right?

1 A. Superintendent always saw them, right.  
 2 Q. Whose duty was it to make that report to  
 3 Health and Welfare?  
 4 A. Whoever received the disclosure. So it didn't  
 5 matter whether you were a safety security officer, if  
 6 you were a rehab tech, if you were a cook, if you were a  
 7 nurse, if you were a superintendent; if you got the  
 8 disclosure, you were obligated to report it.  
 9 Q. In terms of actually transmitting that  
 10 information from JCC-Nampa to the Department of Health  
 11 and Welfare, would that be the responsibility of the  
 12 person taking the report down or once that report makes  
 13 it up to the superintendent is it the superintendent's  
 14 responsibility to do that?  
 15 A. It was the responsibility of the person taking  
 16 the report to notify Health and Welfare. It was the  
 17 responsibility of the staff who got the disclosure, it  
 18 was the responsibility of that staff supervisor as well  
 19 as the superintendent to make sure on that form that the  
 20 notification had been made.  
 21 Q. Is that reflected in a policy anywhere, a  
 22 written policy?  
 23 A. Yes, it is.  
 24 Q. Do you know which one?  
 25 A. Juvenile abuse, I think. I could be wrong.

1 MR. COLLAER: Counsel, are you referring to an  
 2 internal IDJC policy or state statute? Because I don't  
 3 know if the two of you were communicating on that point.  
 4 MR. SCHOPPE: Sure. Either one.  
 5 Q. (BY MR. SCHOPPE) I presume you were referring  
 6 to an internal policy.  
 7 A. Right.  
 8 Q. Did you know of any other statute or anything  
 9 like that that mandated that it work that way?  
 10 A. I know there were other statutes, but I cannot  
 11 recall what they were. Sorry.  
 12 Q. Did anyone ever tell you or instruct you that  
 13 everyone in the facility was a mandatory reporter for  
 14 child abuse or neglect?  
 15 A. Yes.  
 16 Q. Were you aware of any exceptions to that?  
 17 A. No.  
 18 Q. How about with respect to reporting crimes  
 19 that occur within the facility? We all understand that  
 20 the juveniles are there because of crimes they've  
 21 committed. But insofar as crime inside the facility is  
 22 concerned, what were the reporting requirements that  
 23 employees had or that you had specifically as the  
 24 superintendent?  
 25 A. As the superintendent I was required to notify

1 the director, first and foremost. Depending upon what  
 2 the crime was, okay, if they did property damage, if  
 3 they put a hole in the Sheetrock, the maintenance  
 4 craftsman senior would complete documentation, submit it  
 5 to the court requesting restitution.  
 6 If it was a juvenile-on-juvenile assault, the  
 7 juvenile that was assaulted had the option of if they  
 8 wanted to contact law enforcement and file charges. If  
 9 it was a juvenile assault on staff, then the staff had  
 10 the same option to file charges. Local law enforcement  
 11 would be contacted and local law enforcement would come  
 12 out and interview staff, juveniles.  
 13 Q. Would that typically be Nampa Police  
 14 Department?  
 15 A. Yes.  
 16 Q. Did the Canyon County Sheriff ever take those  
 17 reports or was it pretty much always Nampa PD?  
 18 A. As far as I remember it was Nampa PD.  
 19 Q. With respect to crimes that would be reported  
 20 to the director, what were the criteria for deciding  
 21 which to report and which not to report to the director?  
 22 A. Well, I've already told you that I was held  
 23 responsible and accountable for the facility. The  
 24 director was held accountable and responsible for the  
 25 Department. So you needed to keep the director informed

1 of anything and everything, which is what I tried to do.  
 2 Q. So were there any types of crimes that were  
 3 not reported to the director? You had mentioned  
 4 specifically property damage. Would that sort of thing  
 5 typically make it up the chain or something different?  
 6 A. If Billy put a hole in the Sheetrock, I  
 7 probably didn't call the director. But if Billy  
 8 assaulted Timmy, then I would let the director know.  
 9 Q. Were there always incident reports prepared  
 10 for --  
 11 A. Oh, yes.  
 12 Q. One rule I should have told you at the outset,  
 13 it's important that you wait for me to finish my  
 14 question.  
 15 A. Okay.  
 16 Q. Because if we speak over each other, she'll  
 17 strangle me probably. You're off the hook because you  
 18 haven't done this before.  
 19 Were there always incident reports for every  
 20 crime such as violent assaults, things like that in the  
 21 facility, juvenile-on-juvenile sex incidents?  
 22 A. Yes.  
 23 Q. Staff-on-juvenile sex incidents?  
 24 A. Yes.  
 25 Q. How did the incident reporting process work?

1 A. When an incident occurred, the person that was  
 2 the witness to the incident was the person that was  
 3 responsible for initiating the incident report. They  
 4 would document what they witnessed and all the facts  
 5 that they had. That incident report then went to the  
 6 appropriate supervisor.

7 So, for example, Andy, if the incident  
 8 occurred in Choices, it would go from the staff that  
 9 wrote the IR, initiated the IR, it would go to their  
 10 supervisor. From that supervisor it then went to the  
 11 unit manager, if there was one. From there I believe it  
 12 went to the PbS training coordinator, because all the  
 13 incident reports were entered into the PbS portal. The  
 14 last person, the very last person to see and read and  
 15 approve an incident report was your superintendent.

16 Q. As superintendent did you then review every  
 17 incident report as it came in?

18 A. Yes, sir, every one.

19 Q. Were you aware of any incidents in which  
 20 incident reports were changed or altered after they were  
 21 written?

22 A. The only person that could change or alter an  
 23 incident report was the author of the incident report.  
 24 No one else could go in and change anything, including  
 25 the superintendent.

1 Q. Now, when you say "go in," what do you mean;  
 2 is this an electronic system?

3 A. Yes.

4 Q. As far as you know, is that maintained on the  
 5 database for the Department?

6 A. Yes.

7 Q. With respect to the PbS training coordinator,  
 8 had you served as PbS coordinator at one point?

9 A. Yeah, years ago while I was nurse manager. I  
 10 didn't do it for long, maybe a year or two, not long.  
 11 That was quite an undertaking to add on to my other  
 12 responsibilities as nurse manager.

13 Q. Sure.

14 A. Quite involved.

15 Q. What was PbS?

16 A. It's Performance-based Standards. They are  
 17 national standards. Highly regarded standards that our  
 18 department years ago decided to become a part of.

19 Q. Was that under Director Callicutt?

20 A. No, I think that was under Director Reinke, I  
 21 think.

22 Q. What was the purpose of PbS?

23 A. Gathering data, submitting data, submitting  
 24 surveys. And the result was the superintendent, the  
 25 staff, the supervisors, the director, kind of got a

1 report twice a year of where we stood nationally. I  
 2 always referred to it as a report card. For me, I saw  
 3 the value in it, okay. There were 140 employees that  
 4 worked at JCC-Nampa. If I asked all 140 of those people  
 5 what they thought were our biggest problems, you can  
 6 only imagine the number of answers I'm going to get.  
 7 But when I can put all this data in and get this report,  
 8 then the supervisors, the superintendent, and the  
 9 director had something to look at.

10 And we looked at those reports and decide do  
 11 we think this is a concern. something that we need to  
 12 look into, need to look at how to improve, or is it  
 13 something that we know why it's the number it is and go  
 14 from there. Based on your twice a year report from PbS,  
 15 there was a PbS committee at each of the State  
 16 facilities. Once the report was reviewed, then that  
 17 committee would come together and talk about the  
 18 reports, and from that report decide what should be a  
 19 facility improvement plan. And I'm going to try to give  
 20 you an example, Andy.

21 **MR. COLLAER: Wait for a question.**

22 **THE WITNESS: All right.**

23 Q. (BY MR. SCHOPPE) So when you talk about a  
 24 report card, what kinds of things were measured on that  
 25 report card?

1 A. Health, education, safety and security,  
 2 dietary, grievance process, aftercare, a lot of things.

3 Q. Where else, if anywhere, did PbS reports go;  
 4 were they shared with the Legislature or the committee  
 5 that oversees Juvenile Corrections, Department of  
 6 Justice, anything like that?

7 A. I really can't recall if I ever reported to  
 8 the Idaho Department of Juvenile Corrections Advisory  
 9 Board. I don't recall reporting to them PbS data.

10 Q. When you said what standings were, you meant  
 11 standings among other juvenile corrections facilities?

12 A. Yes.

13 Q. With respect to the data that was collected  
 14 for PbS, was any of that same data used or reported to  
 15 the Office of Juvenile Justice and Delinquency  
 16 Prevention of the US Department of Justice?

17 A. I don't know.

18 Q. Do you know anything about the DCTAT reporting  
 19 system?

20 A. No, sir.

21 Q. Or reporting of incidents of violence or  
 22 things like that to the Department of Justice in  
 23 connection with federal grants or funding?

24 A. That's not something that I did.

25 Q. Do you know who did that or who's responsible

1 for that?

2 **MR. COLLAER: If you know.**

3 **THE WITNESS: I don't know.**

4 **Q. (BY MR. SCHOPPE)** No one at JCC-Nampa, as far

5 as you know?

6 **A. No.**

7 **MR. COLLAER: Counsel, it's been over an hour.**

8 **MR. SCHOPPE: Sure. Let's break.**

9 **(Recess taken 10:16 to 10:32.)**

10 **Q. (BY MR. SCHOPPE)** I think we last asked about

11 DCTAT and reporting of data and things like that. To

12 the best of your knowledge, were all incidents involving

13 violent assaults by juveniles documented in incident

14 reports?

15 **A. Yes, sir.**

16 **Q.** Are you aware of any incidents that were not

17 reported?

18 **A. No, sir.**

19 **Q.** Are you aware of any incidents involving sex

20 offenses against juveniles that were not reported,

21 specifically in incident reports?

22 **A. No, sir.**

23 **Q.** Or how about PREA incidents that were not

24 reported as such?

25 **A. Not aware of any.**

1 **Q.** Are you aware of any incident in which

2 juveniles were discouraged from reporting crimes against

3 them to the Department or to a local police department?

4 **A. No, sir.**

5 **Q.** Do you know if Mr. Rohrbach ever discouraged

6 juveniles from reporting crimes against them?

7 **A. No, sir.**

8 **Q.** After you finished your run as PbS coordinator

9 who became the next PbS coordinator?

10 **A. I don't remember.**

11 **Q.** Is it correct to say that you finished your

12 run as PbS coordinator before you became the

13 superintendent of the facility?

14 **A. That's correct.**

15 **Q.** While you were the superintendent of the

16 facility who was the PbS coordinator?

17 **A. Laura Roters and then Lamark Judkins.**

18 **Q.** Do you happen to recall who fulfilled that

19 role prior to Laura Roters?

20 **A. I don't remember.**

21 **Q.** Did Jo McKinney ever serve in that role?

22 **A. Jo McKinney?**

23 **Q. Right.**

24 **A. No, sir.**

25 **Q.** Or did she have anything to do with entering

1 PbS data, as far as you know?

2 **A. Not as far as I know.**

3 **Q.** In terms of the PbS data, how is that

4 collected?

5 **A.** There are staff surveys, there are juvenile

6 surveys, there is information gathered from unit manager

7 or supervisors, there is information gathered from the

8 medical records, from the education records, from the

9 incident reports, just a lot of different areas.

10 **Q.** And since the time that you served as PbS

11 coordinator and through the end of your time at the

12 Department, was there any changes made to the kind of

13 data that was recorded?

14 **A. No, sir.**

15 **Q.** Any changes made to the way in which that was

16 reported to PbS?

17 **A. No, sir.**

18 **Q.** Is it correct to say that the entity that

19 administers PbS is the Council for Juvenile Corrections

20 Administrators, if you know?

21 **A. Could you repeat that.**

22 **Q.** Is it correct to say that the entity that

23 administers PbS is the Council for Juvenile Corrections

24 Administrators, CJCA?

25 **A. That is correct.**

1 **Q.** Do you know if PbS data or the report cards

2 that come out of that have any impact on funding that

3 the Department receives from either the state or the

4 federal government?

5 **A. I don't have any knowledge of that.**

6 **Q.** Do you know who might?

7 **MR. COLLAER: Object to the form of the**

8 **question; calls for speculation. If you know, go ahead.**

9 **THE WITNESS: I don't.**

10 **Q. (BY MR. SCHOPPE)** Did you ask Laura Roters to

11 serve as PbS coordinator?

12 **A. I interviewed Laura Roters for the position**

13 **and she was selected.**

14 **Q.** For the position of PbS coordinator?

15 **A. Right.**

16 **Q.** Was that, as with you, was that sort of an

17 add-on to what she was already doing?

18 **A. No, sir. It was a new position.**

19 **Q.** When was that?

20 **A. I really can't recall. The best I can say was**

21 **maybe my second year as superintendent.**

22 **Q.** If you had started in 2007 would that be about

23 2009?

24 **A. Perhaps.**

25 **Q.** Was that the first position that Ms. Roters



1 held with the Department?  
 2 A. Position, no, sir. Ms. Roters was a  
 3 rehabilitation technician in the Choices unit for many  
 4 years.  
 5 Q. How is it you came to select her to be the PbS  
 6 coordinator?  
 7 A. Through an interview process.  
 8 Q. Was there an application process for that?  
 9 A. Yes, sir.  
 10 Q. Was that posted and open to other applicants?  
 11 A. Yes. Yes, sir.  
 12 Q. Do you know if anyone else applied?  
 13 A. Yes, sir.  
 14 Q. Do you know who else applied?  
 15 A. I can't remember, but there was a bunch.  
 16 Q. Do you happen to recall what the main  
 17 requirements were for that position?  
 18 A. No, sir, I don't.  
 19 Q. How long did Ms. Roters serve in that  
 20 position?  
 21 A. I'm not sure. I want to say two years.  
 22 Q. Was it after she finished that Mr. Judkins  
 23 took over that role?  
 24 A. When Ms. Roters was promoted to unit manager,  
 25 the announcement went out for the PbS training

1 coordinator and Mr. Judkins applied, along with many  
 2 other people. And he was selected and promoted.  
 3 Q. Is that what he does still, as far as you  
 4 know, or at least up to the time you left?  
 5 A. I don't know.  
 6 Q. Up to the time you left?  
 7 A. Yes.  
 8 Q. Stepping back to the legal training that we  
 9 discussed earlier. Were you given any training or  
 10 education as to the state law or policy concerning  
 11 hiring and promotion or disciplining employees?  
 12 A. I received, I wouldn't call it a formal  
 13 training, but I received coaching from our human  
 14 resource staff.  
 15 Q. What kind of coaching did you receive?  
 16 A. That's a big question.  
 17 Q. It sure is. How about with respect to the  
 18 hiring process, what were you trained in that?  
 19 A. I understood about the announcement, I  
 20 understood about how a person got on the register, I  
 21 understood within what group should we consider offering  
 22 interviews to, an interview was scheduled, an interview  
 23 panel was put together, notes were taken at the  
 24 interview where questions were asked of the applicant,  
 25 those notes were submitted to our human resource

1 department. The interview panel would discuss each and  
 2 every interviewee, and a decision would be made based on  
 3 what that group of people felt was the best candidate.  
 4 And then the supervisor that was looking to  
 5 fill a position would seek permission from the next  
 6 level, that being sometimes the superintendent or it  
 7 could be sometimes the director. They would seek  
 8 approval from the next level of supervision and HR to  
 9 offer Betty Grimm this position effective tomorrow at  
 10 this rate of pay.  
 11 Q. Okay.  
 12 A. And you had to go through all those steps and  
 13 you had to get the permission to make the offer.  
 14 Q. Who did you get permission from?  
 15 A. If I was interviewing for a position, I would  
 16 get permission from the director and legal and HR.  
 17 Q. For any position that came open at JCC-Nampa  
 18 while you were the superintendent there, who made the  
 19 final decision as to who to hire, who not to hire?  
 20 A. The final decision about the best candidate  
 21 was made by the interview panel, the participants of  
 22 that.  
 23 Q. Then would they make a recommendation or would  
 24 they just make the offer directly?  
 25 A. No. They would make -- they would submit the

1 name of the person that they wanted to make the offer  
 2 to.  
 3 Q. Would submit that where?  
 4 A. If it was within Nampa, they would submit it  
 5 to me and they would submit it to HR and fiscal.  
 6 Q. Then what would happen?  
 7 A. They'd have to wait to get the approval of  
 8 those people, and then they would make an offer to the  
 9 candidate.  
 10 Q. What was it that you or fiscal or human  
 11 resources had to approve of with respect to any  
 12 candidate?  
 13 A. Well, fiscal, budget, because there was a pay  
 14 range. So it had to do with budget. The best I can  
 15 recall as far as HR, to make sure that the process had  
 16 carried out, the interview process had been carried out  
 17 appropriately and that they had all the documentation.  
 18 Q. How about on your end, did you have sort of  
 19 set criteria or how did you make your decisions?  
 20 A. My decisions were based on the faith and  
 21 confidence that I had in my supervisor that was filling  
 22 the position.  
 23 Q. With respect to any position that came open  
 24 while you were superintendent, were all of those  
 25 positions posted and open to the public?



1 A. As far as I know.  
 2 Q. As far as you know, and it might go back to  
 3 the training or coaching that you received from HR, when  
 4 positions were available at the Department, were they  
 5 required to be posted?  
 6 MR. COLLAER: Object to the form of the  
 7 question; it's vague. Go ahead if you know.  
 8 THE WITNESS: I don't.  
 9 MR. COLLAER: If you know if all positions had  
 10 to be posted. If you don't, you don't.  
 11 Q. (BY MR. SCHOPPE) What was that answer?  
 12 A. As far as I know they were required to be  
 13 posted.  
 14 Q. Are you aware of any exceptions to that rule?  
 15 A. Not that I can think of.  
 16 Q. How about for promotions for people already  
 17 employed at the Department, were those positions  
 18 supposed to be posted as well, as far as you know?  
 19 A. As far as I know.  
 20 Q. Do you recall during your time as  
 21 superintendent if any positions for promotions were not  
 22 posted?  
 23 MR. COLLAER: Object to the form of the  
 24 question; it's vague, also calls for a legal conclusion.  
 25 But go ahead.

1 THE WITNESS: I think my answer would have to  
 2 be that if we were looking to promote from within, I'm  
 3 not sure that those were put out in a formal  
 4 announcement through our website, IDJC's website.  
 5 Q. (BY MR. SCHOPPE) To the public you mean?  
 6 A. Yes.  
 7 Q. How about to other employees already working  
 8 at the Department?  
 9 A. It would always be put out to them.  
 10 Q. No exceptions to that that you're aware of?  
 11 A. No.  
 12 Q. With respect to any hiring or promotion  
 13 decisions, were those decisions ever made prior to the  
 14 interview process or the panel process?  
 15 A. No, sir, not that I'm aware of.  
 16 Q. So no one was ever preselected for a position  
 17 prior to going through the application process?  
 18 A. Not that I was aware of.  
 19 Q. Who is responsible for screening applicants  
 20 for positions at the Department in terms of their  
 21 initial application?  
 22 A. There was, from what I recall, there was what  
 23 was called a subject matter expert. We always referred  
 24 to it as SME. The SME would review the applications and  
 25 score them based on the information that the applicant

1 provided.  
 2 Q. That would be information like relevant  
 3 educational requirements or work experience?  
 4 A. Yes.  
 5 Q. Was that always the same person, the SME, or  
 6 was that a different person, depending on the position?  
 7 A. I don't know because I was not a part of  
 8 selecting the SMEs.  
 9 Q. Who was in charge of selecting the SMEs?  
 10 A. I really don't know.  
 11 Q. In terms of with respect to the scoring  
 12 process you mentioned, if that resulted in a report or  
 13 score or something like that, would that then go to  
 14 human resources or to you, or where would that go?  
 15 A. I don't know. It didn't come to me.  
 16 Q. In terms of determining minimum, sort of  
 17 whether somebody met the threshold for a minimum job  
 18 requirement, for example, college degree, experience in  
 19 supervision or a professional license of some sort, who  
 20 was responsible for making those determinations?  
 21 A. The SME.  
 22 Q. Do you know who would know about the SME  
 23 process and how SMEs are selected?  
 24 A. It would be our human resources.  
 25 Q. Who is in charge of human resources at the

1 Department?  
 2 A. When I left it was Julie Cloud.  
 3 Q. Was she in charge of human resources  
 4 throughout your tenure as the superintendent?  
 5 A. Not throughout.  
 6 Q. Who else was in charge of HR during that time?  
 7 A. My first year as superintendent it was Gina  
 8 Hodge and Gina was the human resource officer for a  
 9 couple of years, she resigned and then Julie Cloud  
 10 became the human resource officer.  
 11 Q. Do you know why Gina Hodge resigned?  
 12 A. No, sir, I do not.  
 13 Q. Did anyone ever tell you why she resigned?  
 14 A. No, sir.  
 15 Q. Let me ask you to start at the beginning. In  
 16 preparing for today's depo, in addition to consulting  
 17 with your attorney, did you review any documents at all?  
 18 A. Yes, sir, I did.  
 19 Q. Can you tell me what you reviewed?  
 20 MR. COLLAER: Go ahead with the exception of  
 21 anything that you got from me, I'm going to instruct you  
 22 not to answer that as attorney-client communication, but  
 23 anything else, go ahead and answer that.  
 24 THE WITNESS: Repeat that again.  
 25 MR. COLLAER: Anything that I gave you or you

1 or I talked about is not within the scope of his  
 2 question. If you reviewed anything else independent of  
 3 that, then go ahead.  
 4 **THE WITNESS: No, I didn't. The answer would**  
 5 **be no.**  
 6 **Q. (BY MR. SCHOPPE)** Did you review any  
 7 pleadings?  
 8 **A. No, sir.**  
 9 **Q. Did you review any discovery responses by any**  
 10 **party?**  
 11 **MR. COLLAER: Same objection. If you did it**  
 12 **outside of what you and I talked about, then go ahead**  
 13 **and answer it.**  
 14 **THE WITNESS: Discovery, I don't understand**  
 15 **"discovery."**  
 16 **MR. COLLAER: Do you even know what that is?**  
 17 **THE WITNESS: No.**  
 18 **MR. COLLAER: Perhaps, Counsel, you should**  
 19 **explain, give an explanation.**  
 20 **MR. SCHOPPE: Sure.**  
 21 **Q. (BY MR. SCHOPPE)** Did you review anyone's  
 22 responses to any interrogatories that have been served  
 23 in this case?  
 24 **A. No, I don't think so.**  
 25 **Q. How about responses to requests for production**

1 of documents?  
 2 **A. No, sir.**  
 3 **Q. How about responses to requests for**  
 4 **admissions?**  
 5 **A. No, sir.**  
 6 **Q. A while back parties exchanged some discovery**  
 7 **instruments, including interrogatories, requests for**  
 8 **production of documents, and requests for admissions.**  
 9 **Did you have a chance to review any of those?**  
 10 **MR. COLLAER: If you have, you have. Have you**  
 11 **reviewed any interrogatory or discovery responses,**  
 12 **anything of that nature, that you can recall?**  
 13 **THE WITNESS: Not that I recall.**  
 14 **Q. (BY MR. SCHOPPE)** Did you participate in  
 15 preparing responses to any of the Plaintiffs'  
 16 interrogatories or requests for production of documents  
 17 or requests for admissions?  
 18 **A. No.**  
 19 **Q. Whether it was preparing for this deposition**  
 20 **or not, have you ever reviewed any of the Plaintiffs'**  
 21 **responses to the discovery in this matter?**  
 22 **MR. COLLAER: If you have. Have you reviewed**  
 23 **any of their answers to interrogatories, anything of**  
 24 **that nature that you can recall, if you can recall?**  
 25 **THE WITNESS: I think so.**

1 **Q. (BY MR. SCHOPPE)** How about deposition  
 2 transcripts, have you reviewed any of those?  
 3 **MR. COLLAER: Go ahead.**  
 4 **THE WITNESS: I have.**  
 5 **Q. (BY MR. SCHOPPE)** Whose deposition transcripts  
 6 have you reviewed?  
 7 **A. Ms. Ledford's and Mr. Farnworth's.**  
 8 **Q. Apart from conferences with your attorney,**  
 9 **have you spoken with anybody else concerning today's**  
 10 **deposition?**  
 11 **A. My husband.**  
 12 **Q. Anything in particular you discussed with him**  
 13 **about it?**  
 14 **MR. COLLAER: Objection; assert the spousal**  
 15 **privilege. Instruct the witness not to answer.**  
 16 **Q. (BY MR. SCHOPPE)** Anybody else at all?  
 17 **A. No, sir.**  
 18 **Q. Apart from your attorney, have you ever**  
 19 **discussed this case with anybody else at all; friends,**  
 20 **family, former employees, current employees?**  
 21 **A. My answer would have to be yes.**  
 22 **Q. Who have you discussed things with?**  
 23 **A. Andy, when the whistle-blower case came out, I**  
 24 **had a number of staff coming to me, upset, emotional,**  
 25 **and I would do what I could to help them.**

1 **Q. Who came to you?**  
 2 **A. Staff and staff and more staff.**  
 3 **Q. Anybody that you can name specifically?**  
 4 **A. All I can tell you, sir, it was a lot of**  
 5 **staff.**  
 6 **Q. Did you speak about it with Ms. Cloud, Julie**  
 7 **Cloud?**  
 8 **A. Yes.**  
 9 **Q. What did you talk about with her?**  
 10 **A. Our conversations were regarding the**  
 11 **importance of making sure there was no retaliation, that**  
 12 **any time that I or the supervisor, one of the**  
 13 **Plaintiffs, if we needed to meet with one of the**  
 14 **Plaintiffs, we should do so with an additional party.**  
 15 **That's what I recall.**  
 16 **Q. Did you discuss the allegations themselves?**  
 17 **A. Did we discuss the allegations? No, sir.**  
 18 **Q. You didn't discuss whether they were true or**  
 19 **anything like that?**  
 20 **A. No, sir.**  
 21 **Q. Did you discuss anything about whether the**  
 22 **allegations concerning hiring practices or veterans**  
 23 **discrimination or anything like that were true?**  
 24 **A. Repeat the question for me.**  
 25 **Q. With Ms. Cloud specifically, did you discuss**

1 anything with her as to whether the allegations  
 2 concerning hiring practices of the Department or  
 3 veterans discrimination were true?  
 4 A. Not that I recall.  
 5 Q. Did you exchange any e-mails with Ms. Cloud  
 6 about the litigation?  
 7 A. I don't remember. I really don't.  
 8 Q. Do you recall exchanging any e-mails with  
 9 anyone about the litigation, apart from your attorneys?  
 10 A. I don't know how to be specific in my answer.  
 11 I am sure that there was probably some e-mail  
 12 communication between myself and my director. There may  
 13 have been some e-mail communication between myself and a  
 14 staff, if that's how the staff communicated to me was  
 15 through e-mail, I would have responded. I just --  
 16 that's the best answer I can give you.  
 17 Q. All right. Anything else that you might have  
 18 discussed with Julie Cloud about any of the Plaintiffs  
 19 after the lawsuit was filed?  
 20 A. I can't recall.  
 21 Q. How about with Director Harrigfeld, did you  
 22 discuss the facts of the litigation with her after the  
 23 lawsuit was filed?  
 24 A. I can't recall that. What I can recall is  
 25 that the Director and I were always in close

1 communication.  
 2 Q. Is that generally speaking?  
 3 A. Yes.  
 4 Q. Anything you didn't communicate about?  
 5 MR. COLLAER: Object to the form of the  
 6 question; vague.  
 7 THE WITNESS: To the Director?  
 8 Q. (BY MR. SCHOPPE) What do you mean by "close  
 9 communication"?  
 10 A. We talked on the phone, we saw each other face  
 11 to face, I knew she was always available to me no matter  
 12 what time of day or night, what day. She was very  
 13 supportive of me and very helpful.  
 14 Q. Do you still speak with the Director since  
 15 your retirement?  
 16 A. I think I have talked to Director Harrigfeld  
 17 twice.  
 18 Q. Did you discuss the litigation?  
 19 A. No, sir.  
 20 Q. How about Ms. Roters, was she among the staff  
 21 that came to you after the litigation was filed?  
 22 A. Yes, she did.  
 23 Q. What did you speak about?  
 24 A. I can't remember.  
 25 Q. Part of the litigation concerns how Ms. Roters

1 came to be hired and promoted. Did you speak about  
 2 those issues?  
 3 A. Did Laura and I speak about them?  
 4 MR. COLLAER: The context was after this  
 5 lawsuit was filed where she came to you.  
 6 THE WITNESS: I can't recall.  
 7 Q. (BY MR. SCHOPPE) How about Julie McCormick,  
 8 did she come to you after the litigation was filed?  
 9 A. I'm sure she did.  
 10 Q. Do you recall what you spoke about with her?  
 11 A. No.  
 12 Q. How about Pat Thomson?  
 13 A. I'm sure I talked to Pat.  
 14 Q. Do you know what you spoke about?  
 15 A. I can't remember.  
 16 Q. During your time as director did any employee  
 17 file lawsuits against the Department?  
 18 MR. COLLAER: You said "director," you mean  
 19 superintendent?  
 20 Q. (BY MR. SCHOPPE) Sorry, superintendent. My  
 21 apologies.  
 22 A. Did anybody else?  
 23 MR. COLLAER: Employees file lawsuits against  
 24 the Department.  
 25 THE WITNESS: Not that I'm aware of.

1 Q. (BY MR. SCHOPPE) How about anybody else,  
 2 including juveniles?  
 3 A. Repeat the question.  
 4 Q. Did anyone else file lawsuits, including  
 5 juveniles?  
 6 A. I believe so.  
 7 Q. Do you know who that was?  
 8 A. I believe it was a young man by the name of  
 9 [REDACTED]  
 10 Q. What was that about?  
 11 A. It was a tort claim that was filed just  
 12 shortly before I retired.  
 13 Q. Do you know what the allegations were?  
 14 A. Sexual misconduct by an employee, former  
 15 employee.  
 16 Q. Who was that?  
 17 A. Sir?  
 18 Q. Who was that?  
 19 A. Julie McCormick.  
 20 Q. Do you know if those allegations were true?  
 21 A. I do not know for a fact.  
 22 Q. Did you discuss that case with Ms. McCormick?  
 23 A. No, sir.  
 24 Q. Did you discuss that case with anyone else?  
 25 A. I discussed it with Nampa Police Department.

1 I discussed it with a detective that contacted me. I  
 2 discussed it with the director of our department, Sharon  
 3 Harrigfeld. I discussed it with the people that I  
 4 needed to discuss it with.  
 5 Q. How did the matter come to be reported to the  
 6 police department?  
 7 A. I got a report from Pat Thomson, whose office  
 8 was directly in front of mine, a staff had come to him  
 9 one afternoon and reported that [REDACTED] had been in  
 10 Julie McCormick's office the evening before for a little  
 11 over two hours. Pat Thomson came in and told me about  
 12 the report that he had just got.  
 13 Q. Do you know who that staff member was that  
 14 made that report?  
 15 A. I believe it was Sarah Certa.  
 16 Q. As far as you know was Mr. Thomson the first  
 17 person that she reported that to?  
 18 MR. COLLAER: If you know.  
 19 THE WITNESS: I don't know.  
 20 Q. (BY MR. SCHOPPE) Now, what was the concern  
 21 with [REDACTED] being in the office with Ms. McCormick  
 22 for two hours?  
 23 A. What was the concern?  
 24 Q. Yes.  
 25 A. That was not appropriate.

1 other person?  
 2 A. Right.  
 3 Q. In terms of the report by Ms. Certa to  
 4 Mr. Thomson, are you aware if she reported anything  
 5 other than that [REDACTED] was in Ms. McCormick's office for  
 6 two hours?  
 7 A. That's all I know.  
 8 Q. You don't know if she reported that she had  
 9 discovered them having sex or anything?  
 10 A. I do not.  
 11 Q. Prior to that incident with [REDACTED] was there  
 12 any concern on your part or on anyone's part there was  
 13 any inappropriate conduct by Ms. McCormick towards  
 14 [REDACTED]?  
 15 A. My answer would be I had concerns, but it was  
 16 not regarding inappropriate.  
 17 Q. What was it regarding?  
 18 A. It had been reported to me that [REDACTED] had  
 19 expressed to staff and his peers an infatuation, if you  
 20 will, with Ms. McCormick. As Ms. McCormick's  
 21 supervisor, I cautioned her and coached her and  
 22 counseled her to refrain from spending time on the  
 23 Solutions unit, particularly the male side, and  
 24 [REDACTED]  
 25 Q. Were you concerned that she was doing anything

1 Q. Did anyone come to find out that -- and I  
 2 understand the charges were for lewd and lascivious  
 3 conduct. Did anyone come to find out that sexual  
 4 relations had taken place between the two of them?  
 5 A. Did anyone come to me about that? No.  
 6 Q. Do you know if SSO Ramos ever made any reports  
 7 about misconduct between Ms. McCormick and [REDACTED]?  
 8 A. Not that I'm aware of.  
 9 Q. Was an investigation conducted by the  
 10 Department into the report?  
 11 A. Yes, sir.  
 12 Q. Who conducted that?  
 13 A. Our attorney Karin Magnelli, and she was  
 14 accompanied by another employee. I don't remember who  
 15 it was.  
 16 Q. Was that someone from human resources?  
 17 A. No, it wasn't human resources; it was somebody  
 18 else.  
 19 Q. If you happen to remember, please let me know.  
 20 Do you know how the matter was investigated?  
 21 A. By our department?  
 22 Q. Yes.  
 23 A. They came to the facility, they interviewed  
 24 staff and juveniles.  
 25 Q. You are talking about Ms. Magnelli and the

1 to invite that or stimulate that?  
 2 A. My answer, Andy, is going to have to be I did  
 3 everything that I could so that nothing inappropriate  
 4 would happen.  
 5 Q. But were you concerned that she was doing  
 6 something to encourage that response by [REDACTED]?  
 7 MR. COLLAER: Are you talking about encourage  
 8 his infatuation?  
 9 Q. (BY MR. SCHOPPE) Did you have any concern  
 10 with that?  
 11 A. I was concerned that he was infatuated because  
 12 he had expressed that, and I did what I could to deter  
 13 her from spending time with him.  
 14 Q. Did that deter her from doing that?  
 15 A. No, sir, it did not. As a result of that, I  
 16 took the appropriate steps in the form of reprimand.  
 17 Q. When you say "reprimand," what do you mean?  
 18 A. Well, I talked to her, just had a  
 19 conversation. She continued to spend time on the  
 20 Solutions unit, it was being reported to me. I brought  
 21 her in. I took it the next level, I did a written  
 22 reprimand. She continued, I brought her in and -- I'm  
 23 sorry, I got ahead of myself.  
 24 I did a verbal warning, then I did a written  
 25 reprimand, and I was in the process of going the next



1 step, which was going to be suspension without pay for  
 2 so many days, and before I was able to carry that out,  
 3 Ms. McCormick went to -- first she went to Julie Cloud  
 4 to let Julie know that she didn't want to remain in a  
 5 supervisory role any more, she wanted to go back to  
 6 being just a safety and security officer.  
 7 Ms. Cloud encouraged Julie McCormick to come  
 8 and talk to me, and Julie did, and I told her, you know,  
 9 I would post the announcement for her position, but  
 10 until I could fill the position, it was my expectation  
 11 she would continue in the role as the safety and  
 12 security supervisor. And in particular, she had a  
 13 significant number of employee appraisals that were due,  
 14 and I made it very clear to her that I wanted her to  
 15 take care of that.  
 16 Q. Did you ever learn why Ms. McCormick wanted to  
 17 be demoted essentially from supervisor back to SSO?  
 18 A. What Ms. McCormick told me was that she didn't  
 19 care for management positions, that she was tired of  
 20 dealing with personnel issues, and she would just prefer  
 21 to go back to being a safety and security officer.  
 22 Q. How long had she been in that position at that  
 23 point in time?  
 24 A. I don't recall exactly. It was -- I believe  
 25 it was less than a year.

1 Q. At what point in time are we right now when  
 2 you've had that discussion with Ms. McCormick; is this  
 3 June, July, August 2012, one of those months?  
 4 A. I don't recall.  
 5 Q. What sorts of things did you do to deter  
 6 Ms. McCormick from spending time with [REDACTED] or on the  
 7 male portion of the Solutions unit?  
 8 A. I talked to her as a supervisor would, and I  
 9 talked to her about risks.  
 10 Q. What kind of risks?  
 11 A. I shared with Ms. McCormick early on a  
 12 situation that I had been familiar with many years ago  
 13 at the Nampa facility where a young man accused one of  
 14 the female staff in the Observation and Assessment unit  
 15 of inappropriate touching. As a result of this young  
 16 man's accusation, that employee was put out on leave  
 17 with pay pending investigation. It came out that he had  
 18 lied about it, he had made the story up because he was  
 19 angry with this employee. The employee came back to  
 20 Nampa, she was a good employee, and we lost her because  
 21 she just found it very difficult to work there any  
 22 longer. She felt like people were looking at her and...  
 23 Q. Was that while you were the superintendent?  
 24 A. No. Many years before that.  
 25 And I shared that as an example not just with

1 Ms. McCormick but a lot of my staff, about the  
 2 importance of not putting yourself in a situation,  
 3 because this is what is going to happen if you're  
 4 accused of something. These steps are going to have to  
 5 be taken.  
 6 Q. So did you prepare a written warning record or  
 7 a document like that for Ms. McCormick?  
 8 A. On Ms. McCormick, written warning, yes.  
 9 Q. Do you know when you prepared that?  
 10 A. I don't remember.  
 11 Q. Is it fair to state the next step up is a  
 12 notice of contemplated action?  
 13 A. I can't remember if one had been done before  
 14 that, because you have to understand, there was a very  
 15 brief window between when she said she wanted the  
 16 demotion and when I put her out the front door and  
 17 contacted Nampa PD. So we're only talking about a short  
 18 period of time.  
 19 Q. When you, as you said, "put her out the front  
 20 door and contacted Nampa PD," did you do that right  
 21 after Mr. Thomson reported to you?  
 22 A. Absolutely.  
 23 Q. For how long had you had concerns about  
 24 Ms. McCormick's conduct with [REDACTED]?  
 25 A. My concern was only a concern about the fact

1 that she was spending time with this young man and that  
 2 it was not her role, okay. However, you have to  
 3 understand, everybody that works at Nampa is there to  
 4 help kids. And I go back to what I said in the  
 5 beginning, the infatuation piece.  
 6 Q. Is there a policy in particular that  
 7 prohibited or governed the kind of contact that she  
 8 could have with [REDACTED] or other juveniles?  
 9 MR. COLLAER: Object to the form of the  
 10 question; it's vague.  
 11 THE WITNESS: Well, I would say it would have  
 12 to probably fall under the juvenile abuse/neglect policy  
 13 and procedure there.  
 14 Q. (BY MR. SCHOPPE) Is that an internal policy?  
 15 A. Yes.  
 16 Q. How about state law like Health and Welfare  
 17 code or PREA, CRIPA, anything like that; were you  
 18 concerned about those things?  
 19 A. Was I concerned?  
 20 Q. Yes.  
 21 A. No.  
 22 Q. Was there any concern that she was interacting  
 23 inappropriately with any other male juveniles?  
 24 A. I only got one other report.  
 25 Q. What was that about?



1 A. I got a report right after the 4th of July  
 2 Ms. McCormick was on the Choices unit and spent a great  
 3 deal of time with a particular young man on that unit.  
 4 Following that report I took the steps I needed to take.  
 5 Q. Who was that that you were referring to, the  
 6 juvenile?  
 7 A. What was his name? I can't remember his name.  
 8 Q. Do you remember who reported that?  
 9 A. I do. Marylou Jeffries.  
 10 Q. Did she report that to you?  
 11 A. No; she reported it to her supervisor.  
 12 Q. Who was that?  
 13 A. Jeff Underhill.  
 14 Q. What does he supervise?  
 15 A. He supervises the staff that worked with the  
 16 children in Choices in the A pod.  
 17 Q. Is Mr. Underhill the one that came to you  
 18 about the issue?  
 19 A. Yes, it is.  
 20 Q. With respect to [REDACTED] did you have any  
 21 specific concerns that there might be a sexual  
 22 relationship or a romantic relationship between  
 23 Ms. McCormick and [REDACTED]?  
 24 A. I did not.  
 25 Q. Did you share all of these concerns with

1 Director Harrigfeld?  
 2 A. I did.  
 3 Q. With anybody else?  
 4 A. Human resources.  
 5 Q. Who did you talk to in human resources?  
 6 A. Julie Cloud, Pat Thomson. I also talked to  
 7 Karin Magnelli, and maybe Nancy Bishop, I can't  
 8 remember.  
 9 Q. When was it that you first developed concerns  
 10 about inappropriate conduct?  
 11 A. I don't remember.  
 12 Q. You indicated you received a report around  
 13 July 4 from Mr. Underhill through Marylou Jeffries about  
 14 another juvenile. You said something about you took the  
 15 steps you needed to take after that. What did you mean  
 16 by that?  
 17 A. I brought Julie in.  
 18 Q. What happened there?  
 19 A. I asked her why she spent time -- she was  
 20 there as extra support. We always had a 4th of July  
 21 display for the kids in the backyard after dark. She  
 22 was there, appropriately, for added safety and security.  
 23 And she had gotten word that a young man was planning to  
 24 assault another kid, so she went into A pod to talk to  
 25 him and to try to help him. And I told Ms. McCormick

1 again that that was not her role.  
 2 Q. As far as you were concerned did you find her  
 3 explanation credible?  
 4 A. I did.  
 5 Q. Did you have any concern at any point that  
 6 Ms. McCormick was spending time with males in off-camera  
 7 places inside the facility?  
 8 A. No, I did not.  
 9 Q. Prior to the report that you received from  
 10 Mr. Thomson that ultimately led to your report to the  
 11 police department, had you received any reports about  
 12 that kind of inappropriate conduct between Ms. McCormick  
 13 and [REDACTED]?  
 14 **MR. COLLAER: What type of inappropriate**  
 15 **conduct are you talking about?**  
 16 Q. (BY MR. SCHOPPE) The kind of conduct that we  
 17 have been testifying here about.  
 18 A. The only reports that I got was the amount of  
 19 time she was spending with [REDACTED] That it's.  
 20 Q. Who did those reports come from?  
 21 A. Different people. I can't remember names. And  
 22 some of it was my own follow-up.  
 23 Q. How do you mean?  
 24 A. What do I mean?  
 25 Q. Yes.

1 A. There are video cameras all over the facility  
 2 that record 24 hours a day 7 days a week. There are  
 3 video cameras outside the facility that record the  
 4 backyard, the front parking lot. IT had set it up for  
 5 me when I became superintendent, I could open up video  
 6 recordings from my desk computer. I could watch what  
 7 was going on in a classroom, I could watch what was  
 8 going on in the gym, I could watch what was going on up  
 9 and down the hall.  
 10 And the majority of the conversations that I  
 11 had with Ms. McCormick were not because of reports  
 12 coming to me from other people; they were a result of my  
 13 own follow-up.  
 14 Q. What did you see that concerned you?  
 15 A. I would see her in the middle of the hall with  
 16 [REDACTED].  
 17 Q. Doing anything in particular?  
 18 A. No, talking.  
 19 Q. Did you ever receive any reports from Laura  
 20 Roters that there was concern about inappropriate  
 21 conduct between the two of them?  
 22 A. I got -- yeah, I remember Ms. Roters telling  
 23 me that Ms. McCormick had taken [REDACTED] off the unit in  
 24 Solutions out into the hall, where she stood and talked  
 25 to him. Following that report I was able to go back in

1 to the video recording, because you can go back, I can  
 2 look, I can look at yesterday, the day before. I would  
 3 go back and look and she was standing there talking to  
 4 him.  
 5 Q. How far back can you go?  
 6 A. I don't know for sure. I want to say seven  
 7 days, but I could be wrong.  
 8 Q. As far as you know are the videos archived  
 9 anywhere?  
 10 A. Are they archived?  
 11 Q. Or stored. Are they deleted after seven days?  
 12 A. Well, after seven days they're gone. A  
 13 supervisor can ask for a particular video to be  
 14 downloaded to a disk, for example, if there was going to  
 15 be an investigation or something like that.  
 16 Q. Are movements of staff with juveniles tracked  
 17 inside the facility?  
 18 A. "Tracked"?  
 19 Q. Right.  
 20 A. Yes.  
 21 Q. How so?  
 22 A. They radio into the control booth.  
 23 Q. That is the policy?  
 24 A. Yes.  
 25 Q. Then what happens from there; what information

1 do they radio in?  
 2 A. I'm moving 12 kids from classroom B to the  
 3 gym-eteria.  
 4 Q. Then what happens inside the control booth?  
 5 A. It's documented in a movement log.  
 6 Q. Is that electronic or paper?  
 7 A. It's electronic.  
 8 Q. Is that record permanent?  
 9 A. As far as I know.  
 10 Q. Can anyone change that once it's entered?  
 11 A. Not that I'm aware.  
 12 Q. Can anyone delete movement logs after they are  
 13 entered?  
 14 A. Not that I'm aware of.  
 15 Q. Do you know whether Ms. McCormick's movements  
 16 with [REDACTED] were documented in a movement log?  
 17 A. I'm not aware.  
 18 Q. Do you know if any of those entries were  
 19 deleted or altered in any way?  
 20 A. Not that I'm aware.  
 21 Q. Do you know who would have the authority or  
 22 ability to make any changes to those logs?  
 23 A. I don't know who that would be.  
 24 Q. But you didn't have the ability or authority  
 25 to do that?

1 A. No.  
 2 Q. Did anyone below you in the facility?  
 3 A. Not that I'm aware of.  
 4 Q. They didn't have that ability?  
 5 A. Not that I'm aware of.  
 6 Q. Did anyone tell you at any point that  
 7 Ms. Certa or anyone else had discovered, had actually  
 8 walked in on [REDACTED] and Ms. McCormick having sex?  
 9 A. No.  
 10 Q. Or maybe just after they had had sex?  
 11 A. No, sir.  
 12 Q. After you learned from Mr. Thomson about the  
 13 incident, what was your next step?  
 14 A. My very next step was I contacted the director  
 15 right away, and I was planning to go and get  
 16 Ms. McCormick, bring her into my office, but I didn't  
 17 get that opportunity because apparently IT had gone in  
 18 and confiscated her computer and that is when  
 19 Ms. McCormick came running into my office.  
 20 Q. IT had already taken her computer?  
 21 A. Yes.  
 22 Q. Do you know who initiated that?  
 23 A. I do not.  
 24 Q. What did she say when she came to your office?  
 25 A. She said, They've come and got my computer.

1 What's going on? And I brought her in, closed the door,  
 2 and I said, Julie, I've had a report that you had [REDACTED]  
 3 [REDACTED] in your office for a couple hours last night; is  
 4 that true? She said yes.  
 5 Q. That was the entirety of the report that had  
 6 been made to you at that point?  
 7 A. Yes.  
 8 Q. You deemed that grounds for termination or  
 9 making the police report?  
 10 A. It was grounds for an investigation.  
 11 Q. Did you contact the police?  
 12 A. I did.  
 13 Q. What did you say to the police?  
 14 A. That a young man had been in an employee's  
 15 office for a considerable amount of time the night  
 16 before, that was not appropriate, and that I had  
 17 concerns and I needed them to come out and follow up.  
 18 Q. Then what happened next?  
 19 A. What do you mean by "next"?  
 20 Q. After you had that conversation with Nampa  
 21 Police.  
 22 A. I cooperated with the police department.  
 23 Q. What did they do, that you saw?  
 24 A. That I saw?  
 25 Q. Yes.

1 A. They wanted the video recording of the evening  
 2 before showing [REDACTED] being taken in to Ms. McCormick's  
 3 office. What else did they want? Whatever they wanted  
 4 I provided.  
 5 Q. Prior to July -- or did you recall what the  
 6 date was on which that occurred?  
 7 A. I can't.  
 8 Q. Do you remember when it was that she actually,  
 9 as you said, you walked her out the door?  
 10 A. August, September, I don't know.  
 11 **MR. COLLAER: Don't guess. If you don't**  
 12 **remember, you don't remember.**  
 13 **THE WITNESS: Thank you.**  
 14 Q. (BY MR. SCHOPPE) Prior to that incident, what  
 15 had you shared with Director Harrigfeld about your  
 16 concerns about Julie?  
 17 A. I shared with the Director that she was  
 18 continuing to not follow my directives. I shared with  
 19 the Director the steps that I was taking.  
 20 Q. How about with Julie Cloud, anything --  
 21 A. Same thing.  
 22 Q. Pat Thomson?  
 23 A. Same thing.  
 24 Q. Anybody else?  
 25 A. Karen Magnelli.

1 Q. The AG's office?  
 2 A. Yes.  
 3 Q. You spoke of another incident that had taken  
 4 place many years ago. Who was the staff member that was  
 5 involved there?  
 6 A. I don't remember.  
 7 Q. Do you remember who the juvenile was?  
 8 A. No, sir.  
 9 Q. During your time as director did you ever hear  
 10 or learn --  
 11 A. Superintendent.  
 12 Q. I'm sorry.  
 13 **MR. SCHOPPE: I'm sorry to you too.**  
 14 Q. (BY MR. SCHOPPE) Did you ever learn or hear  
 15 about any other incidents of inappropriate romantic or  
 16 sexual involvement between juveniles and staff?  
 17 A. I did.  
 18 Q. What did you hear?  
 19 A. I got a phone call from a probation officer  
 20 that I had a cook that was texting, phoning, and going  
 21 to the home of one of the young ladies that was on the  
 22 Solutions unit.  
 23 Q. What does that mean exactly, to her home?  
 24 A. She was far enough along in her program that  
 25 she was allowed to go home on home passes on the

1 weekend. And supposedly he had gone to the home.  
 2 Q. Was that Bryce Larson?  
 3 A. Yes.  
 4 Q. Was the juvenile in question [REDACTED] or  
 5 [REDACTED]?  
 6 A. I don't remember.  
 7 Q. Was that against policy?  
 8 A. Yes.  
 9 Q. Was there a specific policy that that was  
 10 against?  
 11 A. Yes.  
 12 Q. Can you tell me what that was.  
 13 A. No, I can't.  
 14 Q. What happened?  
 15 A. Bryce was placed on administrative leave with  
 16 pay while we investigated, an investigation was carried  
 17 out, the Director and I got the report of that  
 18 investigation. I brought Bryce back into my office, I  
 19 was told the result of the investigation and I brought  
 20 Bryce in and Bryce let me know that he was not going to  
 21 give this young lady up, so I asked for his resignation,  
 22 and I got it.  
 23 Q. Had Bryce been a juvenile who had been  
 24 incarcerated there previously?  
 25 A. Yes.

1 Q. How did he come to be employed there?  
 2 A. It was while I was superintendent, Bryce  
 3 completed the Choices program, was accepted at Job  
 4 Corps, he got his culinary arts certification, he won  
 5 some awards. And he called me constantly wanting to  
 6 come to work for our department. I went to Director  
 7 Callicutt and Director Callicutt wanted to give him a  
 8 chance, so I brought him on board. Well, I say I  
 9 brought him on board, Andy, he interviewed for a cook  
 10 position.  
 11 Q. Had you ever heard about or learned anything  
 12 about a relationship involving the same young man, Bryce  
 13 Larson, and Francine Diaz?  
 14 A. I did. I heard that they were living together  
 15 or something. But when I got that report, they were  
 16 both staff. I contacted legal and --  
 17 **MR. COLLAER: Hold on. I don't want you to**  
 18 **relate anything you and legal talked about.**  
 19 **THE WITNESS: Okay.**  
 20 Q. (BY MR. SCHOPPE) Was that against any  
 21 department policy for them to live together?  
 22 **MR. COLLAER: Objection; calls for a legal**  
 23 **conclusion. Go ahead and answer if you know the answer**  
 24 **to it.**  
 25 **Could you read back the question.**

1 (Record read back.)  
 2 THE WITNESS: Not that I'm aware.  
 3 Q. (BY MR. SCHOPPE) Generally speaking, is it  
 4 against Department policy for former juveniles that had  
 5 been released and Department employees to live together?  
 6 MR. COLLAER: Object; that has been asked and  
 7 answered. Go ahead.  
 8 THE WITNESS: Not that I know of.  
 9 Q. (BY MR. SCHOPPE) Is there any policy or rule  
 10 or law that prohibits employees from socializing or  
 11 fraternizing with juveniles who have been released?  
 12 A. Previous juveniles?  
 13 Q. Sure.  
 14 A. Is that what you're asking?  
 15 Q. Yes. So once a juvenile is released, is there  
 16 a policy that prohibits employees of the Department from  
 17 fraternizing or socializing with them?  
 18 A. I don't know.  
 19 Q. What steps did you take to investigate what  
 20 you had heard about Ms. Diaz and Mr. Larson?  
 21 A. I contacted legal and asked them if there was  
 22 any violation or anything I needed to do.  
 23 Q. Did you look into the facts themselves to see  
 24 whether they were true, or into the allegation?  
 25 A. I talked to Ms. Diaz and I talked to

1 Q. Can you tell me what it is?  
 2 A. It looks like it's a concern from Julie Cloud  
 3 to the Director regarding myself.  
 4 Q. Looking at the bottom of page 2 of that  
 5 document, can you read that last paragraph to me,  
 6 please.  
 7 A. The last paragraph?  
 8 Q. Yes.  
 9 A. "I also advised Betty," that's the one you're  
 10 talking about?  
 11 Q. That is the one.  
 12 A. "I also advised Betty that if she is sitting  
 13 in her office observing the monitor and sees Julie  
 14 interacting with some male juvenile and shouldn't be, to  
 15 go and stop her, and bring her back to the office to  
 16 have a talk with her, rather than just watching the  
 17 monitor and then talking to Pat about what to do."  
 18 Q. Do you remember having that conversation with  
 19 Ms. Cloud?  
 20 A. No, I don't.  
 21 Q. Do you remember having any conversation like  
 22 that with her at all?  
 23 A. I remember having a conversation with  
 24 Ms. Cloud about Ms. McCormick.  
 25 Q. What was that about?

1 Mr. Larson.  
 2 Q. What did they have to say?  
 3 A. That they were in a relationship.  
 4 Q. Did they say how long they had been in a  
 5 relationship?  
 6 A. No.  
 7 Q. Did they indicate whether that relationship  
 8 had existed while Bryce was actually a juvenile?  
 9 A. No.  
 10 Q. Do you know how old Bryce was at the time?  
 11 A. I don't.  
 12 Q. Do you know if he was a minor?  
 13 A. No.  
 14 Q. I'll share with you a document that was  
 15 produced in discovery. Here's your copy. We'll mark  
 16 that in a moment. I don't know that the mark at the top  
 17 was on the original document produced, and on some of my  
 18 documents the Bates stamps are missing.  
 19 (Exhibit 136 marked.)  
 20 Q. (BY MR. SCHOPPE) Go ahead and take a look at  
 21 it, take your time, let me know if you've ever seen that  
 22 document before.  
 23 A. (Reviewing document.) Okay.  
 24 Q. Have you seen that document before?  
 25 A. No.

1 A. It was about [REDACTED]  
 2 Q. Do you remember what each of you said during  
 3 that conversation?  
 4 A. I do recall her telling me that when I saw  
 5 something I needed to handle it immediately.  
 6 Q. Do you feel like, according to your  
 7 recollection, is that a fair characterization of how you  
 8 were observing and monitoring Ms. McCormick?  
 9 A. No.  
 10 Q. How would you disagree with that, if you do?  
 11 A. Well, I not only watched the monitor, but I  
 12 was out and about in the secure area daily, numerous  
 13 times a day, stopping into people's offices, stopping  
 14 into the classrooms. I was visible and accessible.  
 15 Q. Did Director Harrigfeld ever discuss concerns  
 16 like this with you?  
 17 A. Concerns about?  
 18 Q. Let me strike that. Forget that question.  
 19 Did Director Harrigfeld ever tell you that  
 20 Ms. Cloud had expressed these concerns about you?  
 21 A. I don't recall that.  
 22 Q. Do you recall discussing with Director  
 23 Harrigfeld or anybody else that you should do something  
 24 different in dealing with Ms. McCormick and your  
 25 concerns around [REDACTED]?



1 A. I don't recall.  
 2 Q. And fair to say at this point in time you had  
 3 already shared your concerns with Director Harrigfeld  
 4 and Ms. Cloud and they were aware of the situation?  
 5 A. I believe so.  
 6 Q. Did either of them or anyone else who was  
 7 aware of the situation take any action to intervene or  
 8 discipline or otherwise speak to Ms. McCormick?  
 9 A. Not that I'm aware of.  
 10 Q. Is it a surprise to you to read that?  
 11 A. Yes, sir.  
 12 Q. Why is that?  
 13 A. Because, quite frankly, I felt like I had done  
 14 everything I could possibly do to prevent what happened.  
 15 Q. In discussing the situation between [REDACTED] and  
 16 Ms. McCormick with the Director and with Ms. Cloud and  
 17 others, were you looking for assistance in helping to  
 18 deal with the situation?  
 19 A. Repeat that, please.  
 20 Q. Sure. It was pretty garbled.  
 21 In your discussions with the Director and  
 22 Ms. Cloud and others concerning Ms. McCormick,  
 23 specifically with respect to her interactions with  
 24 [REDACTED], were you looking for help or advice in how to  
 25 deal with that?

1 action?  
 2 A. Yes.  
 3 Q. I see that there is a reference in that e-mail  
 4 to "McCormick's five-day suspension NOCA." Did you ever  
 5 see a copy of that document?  
 6 A. I did.  
 7 Q. What were the terms of that document?  
 8 A. I don't remember.  
 9 Q. Do you know if that has been produced in  
 10 response to discovery?  
 11 A. I don't know.  
 12 Q. Do you remember anything about a five-day  
 13 suspension?  
 14 A. I knew that that was the step we were going to  
 15 take.  
 16 Q. When you say "administrative leave," I believe  
 17 you said that earlier, is that what you were referring  
 18 to or are you referring to something more lengthier or  
 19 anything like that?  
 20 A. It's a notice of contemplated action and it  
 21 spells out in there what the employee has done and what  
 22 steps the Department is going to take.  
 23 Q. Did Ms. Cloud ever say anything to you along  
 24 the lines of what you read in the bottom of that second  
 25 page?

1 A. Before she was placed out?  
 2 Q. Yes.  
 3 A. Yes.  
 4 Q. Did you feel that you received help or advice  
 5 in how to deal with that?  
 6 A. Absolutely.  
 7 Q. What sort of help and advice did you get?  
 8 A. What steps to take.  
 9 Q. Did you take all those steps?  
 10 A. I did.  
 11 Q. Are those the same steps that you already  
 12 testified about?  
 13 A. Yes.  
 14 Q. When those didn't seem to put an end to the  
 15 situation, is there anything else you did or did you  
 16 relay that to the Director or to Ms. Cloud or anyone  
 17 else?  
 18 A. I believe I did.  
 19 Q. What did you say to any of them?  
 20 A. That it was continuing to go on.  
 21 Q. Was there any kind of a plan or anything like  
 22 that that was made at that point?  
 23 A. I think the plan was to put her on  
 24 administrative leave without pay.  
 25 Q. Was that as part of a notice of contemplated

1 A. I don't recall.  
 2 Q. Do you know if she ever told you that what you  
 3 were already doing wasn't enough or that you should do  
 4 something different?  
 5 A. I don't recall that.  
 6 Q. Fair to say that is why this is surprising to  
 7 you?  
 8 **MR. COLLAER: Objection; misstates the**  
 9 **document, misstates her testimony.**  
 10 Q. (BY MR. SCHOPPE) I didn't catch your answer.  
 11 **MR. COLLAER: Go ahead.**  
 12 **THE WITNESS: What was the question again?**  
 13 Q. (BY MR. SCHOPPE) Is it fair to say that  
 14 that's why it's a surprise to you to have read that?  
 15 A. It is a surprise to me.  
 16 Q. Do you find it disappointing?  
 17 **MR. COLLAER: Objection; calls for**  
 18 **speculation. And disappointing in what respect,**  
 19 **Counsel?**  
 20 **MR. SCHOPPE: It's up to you.**  
 21 **MR. COLLAER: If you understand the question,**  
 22 **go ahead.**  
 23 **THE WITNESS: I'm going to say it again. I**  
 24 **did everything that I could as a supervisor; took all**  
 25 **the steps that I could take to try prevent anything such**



1 as this from happening.  
 2 Q. (BY MR. SCHOPPE) Given the fact that I don't  
 3 think anybody disputes that it happened -- or do you  
 4 dispute that sex occurred between [REDACTED] and  
 5 Ms. McCormick in the --  
 6 A. I don't know that.  
 7 Q. Are you aware of any of the court proceedings  
 8 involving Ms. McCormick in the criminal context?  
 9 A. No, sir.  
 10 Q. Have you seen any reports or anything to the  
 11 effect that she pled guilty?  
 12 A. I recall reading some news, but I don't  
 13 remember what it said.  
 14 Q. Is it your understanding that sex occurred  
 15 between them, whether or not you know it or not, is that  
 16 your understanding of what happened?  
 17 A. I understand that she admitted, yes.  
 18 Q. Who do you believe is accountable or  
 19 responsible for the fact that occurred in the facility?  
 20 MR. COLLAER: **Objection; it's an incomplete**  
 21 **hypothetical, calls for speculation, and calls for a**  
 22 **legal conclusion.**  
 23 **If you have an opinion about anybody being**  
 24 **responsible for that sexual relationship happening, go**  
 25 **ahead and express your opinion.**

1 actually any administrative steps you could have taken  
 2 prior to the written warning record or the notice of  
 3 contemplated action but that were not taken.  
 4 A. I don't believe so.  
 5 MR. SCHOPPE: **All right. Off the record.**  
 6 **(Luncheon recess taken from 12:00 to 12:55 p.m.)**  
 7 MR. SCHOPPE: **We're back on the record.**  
 8 Q. (BY MR. SCHOPPE) We left off talking about  
 9 the Julie McCormick incident with [REDACTED]. Was an  
 10 incident report prepared for that?  
 11 A. Not that I recall, no, sir.  
 12 Q. Do you know if Diane Miles was involved in  
 13 that incident in any way where [REDACTED] was in with Julie  
 14 McCormick for about two hours?  
 15 A. I believe I was told that it was Diane Miles  
 16 that took [REDACTED] to Ms. McCormick's office.  
 17 Q. Had you been told anything about Ms. Miles  
 18 standing outside the door while [REDACTED] was in with  
 19 Ms. McCormick?  
 20 A. No one told me that, sir. When I viewed the  
 21 video I saw it.  
 22 Q. So she was there the entire time?  
 23 A. No, sir.  
 24 Q. How long was she there?  
 25 A. I don't recall.

1 THE WITNESS: **In my opinion the responsibility**  
 2 **is Ms. McCormick.**  
 3 Q. (BY MR. SCHOPPE) If there are concerns known  
 4 to you and the Director and to Ms. Cloud and others  
 5 about an inappropriate relationship already beginning,  
 6 do you think that anyone is responsible for not having  
 7 done more to intervene to prevent it from happening?  
 8 MR. COLLAER: **Objection; it's an incomplete**  
 9 **hypothetical, calls for a legal conclusion, and calls**  
 10 **for speculation. If you have an opinion, go ahead; but**  
 11 **if you don't, you don't.**  
 12 THE WITNESS: **My opinion is, once again, that**  
 13 **we did everything that we could.**  
 14 Q. (BY MR. SCHOPPE) Were there any other actions  
 15 that were available to you sooner than July 4th?  
 16 MR. COLLAER: **Objection; that is an incomplete**  
 17 **hypothetical and calls for speculation. If you have an**  
 18 **opinion, you can go ahead; if you don't, you don't.**  
 19 THE WITNESS: **I don't.**  
 20 MR. COLLAER: **Counsel, it's noon at this**  
 21 **point. So we're off the record?**  
 22 MR. SCHOPPE: **Just one more question about**  
 23 **that.**  
 24 Q. (BY MR. SCHOPPE) As far as I wasn't really  
 25 asking an opinion, I was asking whether there were

1 Q. Less than an hour, more than an hour?  
 2 A. Less than an hour.  
 3 Q. More than a half hour, less than a half hour?  
 4 A. I just don't remember. I'm sorry.  
 5 Q. That's okay. You don't have to apologize.  
 6 Was a PREA incident report filled out or was  
 7 it reported as a PREA incident?  
 8 A. I don't recall. I really don't recall. I  
 9 don't.  
 10 Q. Do you know if it was reported to Health and  
 11 Welfare as an incident of abuse or neglect of a minor?  
 12 A. First of all, you have to understand that the  
 13 day Julie was put out for spending a couple hours in her  
 14 office with [REDACTED] she had not been accused of  
 15 anything, okay. So there was an investigation to be  
 16 carried out to find out. So if Health and Welfare was  
 17 contacted or PREA, somebody else was taking care of  
 18 that; I was not.  
 19 Q. In the context of the Department, do you know  
 20 who that would have been, whose responsibility?  
 21 A. No, sir, I don't.  
 22 Q. So as far as you know, on the day of the  
 23 incident where you actually escorted her out and made a  
 24 police report, there was no allegation at all that they  
 25 had actually had sexual relations?

1 A. No, no, none.  
 2 Q. Did you ever speak with Ms. Certa about the  
 3 incident afterwards?  
 4 A. Ms. Certa came to see me shortly after that.  
 5 I don't recall exactly when.  
 6 Q. What did she tell you?  
 7 A. That she was very upset that she cost Julie  
 8 McCormick her job.  
 9 Q. Did she tell you at any time that she had  
 10 actually seen them having sex or after sex?  
 11 A. She did not.  
 12 Q. With respect to the incident involving Bryce  
 13 Larson and [REDACTED] that we talked about earlier, was any  
 14 of that reported either as a PREA incident or to the  
 15 local police department or to the Department of Health  
 16 and Welfare?  
 17 A. I don't recall. I honestly don't recall. I  
 18 recall the investigation said there was nothing at the  
 19 time of a sexual nature.  
 20 Q. Who had conducted that investigation?  
 21 A. One of our internal investigators, and I  
 22 believe that was Terry from JCC-Lewiston.  
 23 Q. Do you remember his last name? Is that a man?  
 24 A. No, I don't. Sorry.  
 25 Q. Is that a man though?

1 A. Yes.  
 2 Q. In 2011 -- or actually stepping back into  
 3 2010, did any employee, including any of the Plaintiffs,  
 4 raise any concerns to you that the Department was not  
 5 following proper hiring practices?  
 6 A. Did anyone come to me?  
 7 Q. Yes. Did anyone make any reports to you about  
 8 that?  
 9 A. No, sir.  
 10 Q. Did anyone in that year, in 2010, indicate to  
 11 you that -- first of all, let me ask you: Do you recall  
 12 when Ms. Roters was hired in the O&A unit?  
 13 A. She wasn't hired in the O&A unit; I moved  
 14 Ms. Roters from Choices and Solutions to O&A.  
 15 Q. What was her role in Choices?  
 16 A. Unit manager.  
 17 Q. Then she went over to O&A from there?  
 18 A. Right.  
 19 Q. Let's step back to Choices. As unit manager,  
 20 when was she hired for that position?  
 21 A. I don't recall.  
 22 Q. When she was hired for that position did you  
 23 have any part in making that decision?  
 24 A. No, sir.  
 25 Q. Who made that decision?

1 A. Dave Rohrbach and the people that were  
 2 assisting him with the interviews.  
 3 Q. Do you know who that was?  
 4 A. No, sir, I don't recall.  
 5 Q. What was Mr. Rohrbach's role at that time?  
 6 A. Program manager.  
 7 Q. He was a subordinate of yours?  
 8 A. I supervised him.  
 9 Q. In making a hire of that sort in a supervisory  
 10 capacity, is unit manager a supervisory capacity,  
 11 supervisory position?  
 12 A. Not necessarily. It just depended what unit  
 13 you were working on and what that role would entail.  
 14 Q. Was her role as unit manager there, did that  
 15 involve supervising employees?  
 16 A. No, sir, because in Choices the employees were  
 17 supervised by the group leader in each one of the pods.  
 18 So when I say "no, sir," I take that back. Laura would  
 19 have supervised the group leaders. The group leaders  
 20 supervised the staff that worked in their unit.  
 21 Q. Were you familiar with the job description at  
 22 that time?  
 23 A. Unit manager?  
 24 Q. Yes.  
 25 A. Yes, sir.

1 Q. Did that position require prior supervisory  
 2 experience?  
 3 MR. COLLAER: Are you talking about the job  
 4 description?  
 5 MR. SCHOPPE: Yes, the position.  
 6 THE WITNESS: I don't recall.  
 7 Q. (BY MR. SCHOPPE) For someone to be placed in  
 8 a supervisory position, would prior supervisory  
 9 experience typically be a requirement?  
 10 MR. COLLAER: Object to the form of the  
 11 question; it's vague and calls for speculation.  
 12 THE WITNESS: I can't answer that.  
 13 Q. (BY MR. SCHOPPE) Well, I need some answer  
 14 even if it's you don't know or --  
 15 A. I don't know.  
 16 Q. That's fine.  
 17 Did you ever discuss with anyone that that  
 18 position required previous supervisory experience?  
 19 A. Did I discuss with someone?  
 20 Q. That's right.  
 21 A. Not that I recall.  
 22 Q. Did you discuss Ms. Roters hiring with  
 23 Mr. Rohrbach?  
 24 A. Did I discuss what?  
 25 Q. Ms. Roters hiring in that position with

1 Mr. Rohrbach.  
 2 A. Following the interviews it was Mr. Rohrbach  
 3 that came to me and said that they had selected Laura,  
 4 and I approved that.  
 5 Q. You approved that.  
 6 And how about fiscal and HR?  
 7 A. Yes.  
 8 Q. At the time did you have any concern at all  
 9 that Ms. Roters did not have any prior supervisory  
 10 experience?  
 11 A. Not that I recall.  
 12 Q. As you sit here now, is it your understanding  
 13 that prior to that position she did not have any  
 14 supervisory experience?  
 15 A. I don't remember.  
 16 Q. Do you know if other employees had applied for  
 17 that position?  
 18 A. I'm sure they did.  
 19 Q. Do you know of any specific employees who  
 20 applied?  
 21 A. Not that I can recall.  
 22 Q. Do you remember if Mark Freckleton applied?  
 23 A. For unit manager, I don't know.  
 24 Q. Do you know if any applicants for the position  
 25 who had supervisory experience were passed over for the

1 position?  
 2 A. Not that I'm aware of.  
 3 Q. At some point in 2011 did the issue of  
 4 Ms. Roters' qualifications for the position come into  
 5 question at the facility?  
 6 A. I'm assuming you have given me the right date,  
 7 but yes, I was met and approached by Julie Cloud that  
 8 there had been a question raised and as a result of  
 9 that, the promotion of Laura Roters to unit manager was  
 10 going to have to be rescinded.  
 11 Q. Did she tell you what those questions were?  
 12 A. I don't recall.  
 13 Q. Did she tell you why that action needed to be  
 14 taken?  
 15 A. I think this was direction that she had gotten  
 16 from the State human resources.  
 17 Q. Is it correct to say the Department has its  
 18 own human resources department?  
 19 A. Our department does, yes.  
 20 Q. Does that department in turn report to the  
 21 State human resources department, as far as you know?  
 22 A. I don't know.  
 23 Q. What did she have to say about what the State  
 24 had said?  
 25 A. That there had been a question about

1 Ms. Roters' promotion, that again, they were going to  
 2 have to rescind it, and that they were going to be  
 3 looking at the announcement, the candidates. That's all  
 4 I can remember.  
 5 Q. Was her promotion, in fact, rescinded?  
 6 A. Yes.  
 7 Q. What happened with the position after that;  
 8 did it remain vacant or did someone fill it?  
 9 A. No, it just sat in limbo. We couldn't fill it  
 10 until State HR had made some kind of a decision.  
 11 Q. Was a decision eventually made?  
 12 A. Eventually.  
 13 Q. Then what was that decision; what happened  
 14 next?  
 15 A. There was another interview process.  
 16 Candidates applied, interviewed, and I believe  
 17 Ms. Roters was selected a second time.  
 18 Q. Do you know what was different about her  
 19 qualifications at that point?  
 20 A. No, I don't.  
 21 Q. Do you know if she had undergone any or if she  
 22 had gained any supervisory experience or had any  
 23 training perhaps?  
 24 A. I know that she attended a course at BSU,  
 25 along with Ms. McCormick, that had been recommended by

1 Human Resource Officer Julie Cloud.  
 2 Q. As far as you know, was that deemed to be  
 3 appropriate to meet the job requirements in terms of  
 4 supervisory experience?  
 5 A. All I can tell you is it was supposed to be a  
 6 good training, not geared just towards supervision but  
 7 how to develop a team, how to work within a team, things  
 8 like that. That's all I know.  
 9 Q. Is that a standard practice to -- well, one,  
 10 did the Department pay for those courses?  
 11 A. Yes.  
 12 Q. Is that standard practice for the Department  
 13 to pay for that sort of training?  
 14 A. Employees can submit a request to go to a  
 15 training. The supervisor takes a look at the training  
 16 to see if it's -- how it's going to help them in their  
 17 performance, and the supervisor approves and the State  
 18 pays.  
 19 Q. Then who made that decision for Ms. Roters,  
 20 the one you just spoke of?  
 21 A. To go to that training?  
 22 Q. To approve that training.  
 23 A. I believe Mr. Rohrbach did.  
 24 Q. How about for Ms. McCormick?  
 25 A. I did because I supervised Ms. McCormick.

1 Q. Are you aware of any other instances in which  
 2 the Department has paid for employees to go through  
 3 training like that at BSU?  
 4 A. Oh, yeah. It wasn't long after that BSU had  
 5 another one. And the only one I can remember, I think  
 6 Eric Cotton went and somebody else. Oh, yeah.  
 7 Q. And was there a particular reason that  
 8 Ms. McCormick was authorized or sponsored effectively to  
 9 go to BSU for that course?  
 10 A. She was a new supervisor, she wanted to go. I  
 11 took the information that Julie Cloud gave me about this  
 12 course and I shared it with Julie McCormick and  
 13 Ms. Roters.  
 14 Q. With respect to Ms. Roters, do you know who  
 15 raised the questions with Julie Cloud about Ms. Roters'  
 16 qualifications?  
 17 A. I don't know.  
 18 Q. Did you hear anyone else at the Department  
 19 express concern or their belief that the hiring  
 20 practices or the rules about hiring employees had been  
 21 broken in hiring Ms. Roters?  
 22 A. I heard it at an all-staff meeting.  
 23 Q. Do you remember who you heard it from?  
 24 A. O&A staff.  
 25 Q. Any specifics as to who spoke out about it?

1 A. I can't recall.  
 2 Q. O&A staff generally?  
 3 A. Right.  
 4 Q. Any other employees that you recall?  
 5 A. No, sir.  
 6 Q. Was that all-staff meeting in November of  
 7 2011?  
 8 A. Yes.  
 9 Q. Do you recall whether a petition might have  
 10 been circulated expressing staff concerns about hiring  
 11 practices?  
 12 A. I heard that.  
 13 Q. Did you ever see the petition?  
 14 A. No, sir.  
 15 Q. Did you ever talk about it with anybody?  
 16 A. One person.  
 17 Q. Who was that?  
 18 A. Ray Gregston.  
 19 Q. What did you speak about with Ray?  
 20 A. I got a phone call at home advising me that  
 21 Ray was inviting people out to his maintenance shop to  
 22 sign a petition objecting to the promotion of  
 23 Ms. Roters. I was shocked. I contacted the Director,  
 24 and Director Harrigfeld and I met with Ray on Monday  
 25 morning at 9:30 in my office and I asked him.

1 Q. What did you talk about?  
 2 A. A lot of things. Mr. Gregston talked about  
 3 people being promoted that weren't qualified. He talked  
 4 about people playing golf while they're on the clock. I  
 5 don't know. He just talked about a lot of things. And  
 6 I remember thinking: Why has he saved all this stuff up  
 7 for me? I had a standing appointment with Ray Gregston  
 8 every Monday at 9:30, I had a standing appointment every  
 9 week with all of my direct reports. And it was like --  
 10 so the Director and I talked to Ray.  
 11 Q. Anything else that you recall speaking about  
 12 with Ray?  
 13 A. I can't remember.  
 14 Q. Was anyone else present?  
 15 A. No, just the Director and I.  
 16 Q. Did Ray discuss with you any other employees  
 17 who were involved in the petition?  
 18 A. He didn't talk to me about that.  
 19 Q. Did you ever find out who might have signed  
 20 the petition or supported it?  
 21 A. No, sir.  
 22 Q. Was there any problem with employees  
 23 circulating or signing a petition, any policy against  
 24 it?  
 25 A. Well, that's really not the way to handle a

1 concern. There are other processes.  
 2 Q. For concerns like that, what are the processes  
 3 that employees should go through?  
 4 A. Problem solving.  
 5 Q. Is problem solving a process that is used to  
 6 deal with interpersonal issues between supervisors and  
 7 employees?  
 8 A. It can be used, as far as I know, sir, for any  
 9 problem.  
 10 Q. Or in response to disciplinary actions?  
 11 A. Yes, sir.  
 12 Q. Is there any policy though that prevents a  
 13 group of employees from preparing or signing a petition  
 14 that expresses their concerns?  
 15 A. Not that I'm aware of.  
 16 Q. Did you find that -- was it a matter of form;  
 17 was it a problem with the form that it was presented in,  
 18 or how would you have wanted it to be dealt with, all  
 19 these issues that came up?  
 20 A. I would have preferred --  
 21 **MR. COLLAER: Are you assuming that she**  
 22 **actually saw the petition?**  
 23 **MR. SCHOPPE: No. I believe she already said**  
 24 **no.**  
 25 **THE WITNESS: I would prefer that when an**



1 employee has an issue that they bring it up right then  
 2 and there with the appropriate party. And that's not  
 3 what happened. It was like Ray just held on to all this  
 4 stuff and then all of a sudden, boom.  
 5 Q. (BY MR. SCHOPPE) Was that the first time you  
 6 had heard any concerns about any of those things that  
 7 Ray spoke about with you from anyone at all?  
 8 A. That's correct.  
 9 Q. So no one had said anything, expressed any  
 10 concerns about improper hiring practices of her that  
 11 day?  
 12 A. No.  
 13 Q. Nobody had expressed any concerns about people  
 14 golfing off site or anything like that?  
 15 A. No, that was the first time I heard it.  
 16 Q. If any of the Plaintiffs or any other  
 17 employees were to testify that they had said things to  
 18 you, would they be lying?  
 19 A. Sir?  
 20 Q. If any of the Plaintiffs or any other  
 21 employees were to testify they had said those things to  
 22 you, made those reports to you, would they be lying?  
 23 MR. COLLAER: What reports are you referring  
 24 to, what things?  
 25 MR. SCHOPPE: The ones we just talked about.

1 A. He said she didn't have any supervisory  
 2 experience.  
 3 Q. Was that true?  
 4 A. No, it was not.  
 5 Q. What was her supervisory experience?  
 6 A. She supervised a group at Job Corps over a  
 7 particular trade. I can't remember now which trade that  
 8 was. And it was on her application and the reference  
 9 check was done. I'm the one that called a gentleman at  
 10 Job Corps who told me about her supervisory experience.  
 11 Q. Who made the decision to place Ms. McCormick  
 12 as the supervising staff security officer?  
 13 A. Myself and the people that helped me with the  
 14 interviews.  
 15 Q. Who was that?  
 16 A. I can't remember.  
 17 Q. Is it fair to say that you believe her prior  
 18 supervisory experience at Job Corps was sufficient to  
 19 qualify her to be the supervising SSO?  
 20 A. I believed that Ms. McCormick had worked for  
 21 the Department long enough, she had demonstrated her  
 22 knowledge and skills, she was a good employee, a valued  
 23 employee. That's my answer.  
 24 Q. Do you recall if any other applicants for the  
 25 position had equal or greater supervisory experience?

1 MR. COLLAER: Golf and the hiring practices?  
 2 THE WITNESS: That they brought that to my  
 3 attention? No one brought it to my attention until Ray  
 4 Gregston did.  
 5 Q. (BY MR. SCHOPPE) My question though is if  
 6 they testified differently, would they be lying?  
 7 A. I would have to say yes, because I don't  
 8 recall anybody else coming to me.  
 9 Q. What were the hiring concerns that were  
 10 expressed about Ms. McCormick?  
 11 MR. COLLAER: Objection; that assumes any  
 12 hiring concerns were raised with respect to  
 13 Ms. McCormick.  
 14 MR. SCHOPPE: She already testified that was  
 15 the fact, the case.  
 16 MR. COLLAER: No, that misstates her  
 17 testimony.  
 18 Q. (BY MR. SCHOPPE) Do you know, were hiring  
 19 concerns or concerns about the hiring of Ms. McCormick  
 20 raised to you?  
 21 A. Ray Gregston brought that up that same day.  
 22 Q. Was this before or after the all-staff  
 23 meeting?  
 24 A. Before.  
 25 Q. What were those concerns?

1 A. I don't recall.  
 2 Q. You mentioned she had worked for the  
 3 Department for a while. What was her role there before  
 4 that?  
 5 A. Safety and security officer.  
 6 Q. How long had she done that job?  
 7 A. Long time. She worked mainly in our control  
 8 booth on the evening shift. Early on as a new  
 9 superintendent I was quite impressed whenever I'd need  
 10 to call back out to the facility because Ms. McCormick  
 11 always knew what was going on.  
 12 Q. Do you recall how many years she might have  
 13 worked there or when she might have started?  
 14 A. I don't.  
 15 Q. Had she applied for any other positions within  
 16 the facility, as far as you can recall?  
 17 A. Not that I recall.  
 18 Q. Do you recall if she applied for rehab tech  
 19 positions?  
 20 A. I don't know.  
 21 Q. Is that a position that you would sign off on  
 22 in hiring someone for if it came to you?  
 23 A. No. The rehab tech position would be approved  
 24 by the unit manager or the program manager, and go from  
 25 there.



1 Q. With respect to Ms. Roters and Ms. McCormick,  
 2 did Director Harrigfeld have any role in approving their  
 3 hiring for those positions?  
 4 A. Well, because Julie McCormick was going to  
 5 answer to me I had to get Sharon's approval for Julie's  
 6 promotion, and I got that. And Laura Roters, again,  
 7 Dave Rohrbach e-mailed myself and Sharon, because when  
 8 Laura got promoted a second time we just needed to make  
 9 sure of that.  
 10 Q. What was that second time you're talking  
 11 about?  
 12 A. It was after her promotion was rescinded the  
 13 first time. She applied and interviewed a second time  
 14 and was selected again.  
 15 Q. If Julie McCormick's supervisory experience  
 16 was enough as far as you were concerned to place her in  
 17 a supervising staff security officer position, why was  
 18 it that she was sent for training at BSU?  
 19 A. It was not to get supervisory training, okay.  
 20 This was a training that was recommended to me by my  
 21 human resource officer, that I should probably start  
 22 sending some people to it. I asked her for  
 23 recommendations and she felt Julie McCormick would  
 24 benefit from it and she felt Laura Roters would too.  
 25 Q. Did she say why she thought Julie McCormick

1 would benefit from it?  
 2 A. Because she was a new supervisor.  
 3 Q. And was that Julie Cloud?  
 4 A. Yeah.  
 5 Q. At the all-staff meeting in November 2011,  
 6 what were the things that the O&A staff that you  
 7 mentioned earlier were saying to you?  
 8 A. They were very upset, they were very upset  
 9 over losing their ten-hour shifts. They were upset  
 10 about hiring practices. They claimed that qualified  
 11 people and good people were being passed over. I'm  
 12 trying to remember what else.  
 13 Q. Did they name any specific people?  
 14 A. No.  
 15 Q. Or any specific positions?  
 16 A. I don't remember.  
 17 Q. Did any other issues come up regarding time  
 18 card padding or forgery of time records or anything like  
 19 that?  
 20 A. At the all-staff meeting, not that I recall.  
 21 Q. In your conversation with Mr. Gregston  
 22 regarding someone golfing, did he say who that was?  
 23 A. I don't -- I can't say for sure.  
 24 Q. Could it have been Mr. Baranco?  
 25 A. I know that eventually I heard it was

1 Mr. Baranco, but I can't say for sure that Ray Gregston  
 2 is the one that said it was Mr. Baranco.  
 3 Q. When those issues were raised there, did you  
 4 investigate them at all?  
 5 A. I did?  
 6 Q. What did you find?  
 7 A. I talked to Mr. Baranco's supervisor, Valarie  
 8 Zuniga. Any time Mr. Baranco took a break during the  
 9 day to go and hit balls, he got her permission. This  
 10 was a clinician in O&A that day in and day out had to  
 11 meet with children and hear some pretty horrific stuff.  
 12 Q. Prior to the all-staff meeting had any  
 13 employee, including any of the Plaintiffs, ever  
 14 expressed to you concern that the facility was not a  
 15 secure facility?  
 16 MR. COLLAER: Could you read that question  
 17 back to me, please.  
 18 (Record read back.)  
 19 THE WITNESS: I don't recall that.  
 20 Q. (BY MR. SCHOPPE) Did anyone tell you that  
 21 they felt that the facility was unreasonably dangerous?  
 22 A. Was what?  
 23 Q. Unreasonably dangerous.  
 24 A. I heard concerns expressed quite frequently by  
 25 the observation and assessment staff.

1 Q. Anyone specific there?  
 2 A. I can't. No, I can't give you any specific  
 3 name.  
 4 Q. What were the concerns that were being  
 5 expressed?  
 6 A. Restraints, number of restraints.  
 7 Q. What do you mean by that?  
 8 A. Physical interventions, where the staff would  
 9 have to take a child down.  
 10 Q. What was the concern about those?  
 11 A. The number of them.  
 12 Q. That there were too many or too few?  
 13 A. Too many.  
 14 Q. What was the problem with there being too  
 15 many? What was the real concern that they were trying  
 16 to express to you that you understood them to be saying?  
 17 Was there a reason there were too many I guess I'm  
 18 asking?  
 19 A. They felt that with the kind of kids that we  
 20 were getting, they felt that if we had more staff,  
 21 things like that.  
 22 Q. Did you have an opinion as to whether there  
 23 ought to be more staff at the facility?  
 24 A. Did I have an opinion?  
 25 Q. Yes.

1 A. I would have loved to have had more staff, but  
 2 that wasn't going to happen.  
 3 Q. Why not?  
 4 A. Because we are funded by the State of Idaho  
 5 and the legislators are the ones that fund the  
 6 positions. And the Director each year has to go before  
 7 the legislators to ask for additional positions or a new  
 8 position and...  
 9 Q. At some point was there a hiring freeze,  
 10 hiring and promotions freeze imposed by the Governor?  
 11 A. Seems I recall something like that, yeah.  
 12 Q. Do you know if anyone was hired or promoted  
 13 during that time of the freeze?  
 14 A. I can't recall.  
 15 Q. With respect to the PREA training you  
 16 mentioned earlier, is it your understanding that PREA  
 17 mandates a certain staff/juvenile ratio?  
 18 A. I don't recall.  
 19 Q. Do you know who would be the person best to  
 20 ask about that sort of thing?  
 21 A. It would probably be our state PREA  
 22 coordinator.  
 23 Q. Who is that?  
 24 A. I don't know at this time.  
 25 Q. Who was it when you were superintendent?

1 A. I believe Pat Thomson.  
 2 Q. Were you present at those meetings?  
 3 A. Not all of them, no, sir.  
 4 Q. Do you recall what meetings you were present  
 5 at with which employees?  
 6 A. One in particular that I can recall.  
 7 Q. Tell me about that, please.  
 8 A. It was in the conference room. That's when I  
 9 first heard the term that we were a Club Med. I heard  
 10 that from the maintenance craftsman. That's all I can  
 11 remember. It was not a -- it was a good meeting.  
 12 Q. Was that Bob Robinson?  
 13 A. Yes.  
 14 Q. Did you understand what he meant by "Club  
 15 Med"?  
 16 A. The Director asked him to clarify and I  
 17 believe what I recall he said that we were too easy on  
 18 the kids and we needed to remember that they were  
 19 criminals. Anyway.  
 20 Q. How did you respond to that?  
 21 A. JCC-Nampa, JCC-Lewiston, and JCC-St. Anthony  
 22 are not prisons.  
 23 Q. Is that how you responded to him at the time?  
 24 A. Yes.  
 25 Q. Did you say those words to him?

1 A. I don't remember who that was. Sorry.  
 2 Q. That's okay. You don't have to apologize.  
 3 During your time as the superintendent, did  
 4 anyone at the Department, including any of the  
 5 employees, tell you they believed that the  
 6 staff-to-juvenile ratios were inappropriate or unsafe?  
 7 A. I don't remember that. Again, I'm going to  
 8 tell you I remember the O&A staff saying they needed  
 9 more staff.  
 10 Q. Anyone outside of O&A say that the staffing  
 11 ratios were unsafe?  
 12 A. Not that I recall.  
 13 Q. After the November 2011 all-staff meeting, did  
 14 you have any further discussions with any employees,  
 15 including any of the Plaintiffs, regarding concerns  
 16 about the facility being unsafe or dangerous?  
 17 A. After the all-staff meeting, Director  
 18 Harrigfeld came out to the Nampa facility and she, along  
 19 with human resources, met with every staff at the Nampa  
 20 facility, encouraging staff to speak up, speak out about  
 21 their issues and concerns. Minutes were taken at each  
 22 one of those meetings.  
 23 Q. Do you know who took the minutes?  
 24 A. I believe it was HR.  
 25 Q. Do you know who in particular?

1 A. I don't know if I said it that day, but I did  
 2 say it.  
 3 Q. So is it fair to say that you disagreed with  
 4 him?  
 5 A. I did.  
 6 Q. Was it your understanding that he felt that it  
 7 was an undisciplined environment?  
 8 A. A what?  
 9 Q. Undisciplined environment for juveniles.  
 10 A. Again, sir, all I can remember him saying is  
 11 that we were too easy on the kids.  
 12 Q. Were you present at any meeting with Director  
 13 Harrigfeld or Pat Thomson in which Mr. Thomson said  
 14 there should be no more petitions?  
 15 A. I don't think so. I don't remember hearing  
 16 that.  
 17 Q. Do you remember hearing that at any point from  
 18 anybody?  
 19 A. No, sir, I don't.  
 20 Q. Do you remember anyone saying anything at all  
 21 to the effect that employees should not present further  
 22 petitions with their concerns or grievances?  
 23 A. Not that I heard.  
 24 Q. After the November 2011 all-staff meeting, do  
 25 you recall anything that may have been called a bucket

1 list being circulated?  
 2 A. A what list?  
 3 Q. A bucket list.  
 4 A. A bucket list? No, sir, I don't recall a  
 5 bucket list.  
 6 Q. Sort of a wish list that employees had for  
 7 improvements or changes at the facility.  
 8 A. You know what, I do recall hearing something  
 9 about a bucket list, but I can't tell you what it was  
 10 connected to.  
 11 Q. You didn't understand it was connected to the  
 12 concerns raised at the all-staff meeting or not?  
 13 A. No.  
 14 Q. You didn't know if it was connected to the  
 15 concerns that may have been raised, like Mr. Robinson's  
 16 Club Med concern or report?  
 17 A. I don't recall.  
 18 Q. Do you recall ever seeing a list like that or  
 19 document like that?  
 20 A. A bucket list document? I don't connect it to  
 21 a bucket list. What I recall seeing is that after the  
 22 meetings were held, Pat Thomson took all the minutes and  
 23 put them into a document and that was shared with myself  
 24 and all of my supervisors at Nampa.  
 25 Q. Was a committee formed to deal with those

1 concerns?  
 2 A. Yes.  
 3 Q. Was there a name for that committee?  
 4 A. No, there wasn't a name for it, that I knew  
 5 of.  
 6 Q. Did you have regular meetings?  
 7 A. Different supervisors took various concerns  
 8 from that list and scheduled a meeting, invited staff to  
 9 the meeting. One that comes to mind is Valarie Zuniga  
 10 took on a couple of issues, invited staff, they came up  
 11 with some suggestions to improve in some areas, and she  
 12 reported back to the staff at the next all-staff  
 13 meeting.  
 14 Q. What was that, what did she say in that  
 15 report; were you there?  
 16 A. I don't remember.  
 17 Q. Were the changes or any of the changes that  
 18 were proposed actually made?  
 19 A. As far as I know, sir, they were.  
 20 Q. Do you know which ones?  
 21 A. No, I can't recall.  
 22 Q. Do you recall any of the specific suggestions  
 23 that were made for changes?  
 24 A. I don't recall.  
 25 Q. Did you view the concerns raised by

1 Mr. Gregston back before the all-staff meeting as  
 2 critical of your management of the facility?  
 3 MR. COLLAER: Are you talking about during the  
 4 meeting they had or --  
 5 MR. SCHOPPE: Yes. When they spoke about  
 6 them.  
 7 THE WITNESS: My answer would be Mr. Gregston  
 8 was obviously very angry. And I've already told you I  
 9 didn't understand why he saved up all this stuff and why  
 10 he wasn't bringing it to my attention when it became a  
 11 concern.  
 12 Q. (BY MR. SCHOPPE) Is it fair to say that you  
 13 understood that it was criticism though?  
 14 A. That it was what?  
 15 Q. Criticism.  
 16 A. Yeah.  
 17 Q. Same question with respect to the Director,  
 18 the concerns he was raising were critical of her  
 19 management of the Department as a whole?  
 20 A. Well, I can't speak for Sharon.  
 21 Q. What was your understanding?  
 22 A. He was angry.  
 23 Q. Fair to say that what he was saying was  
 24 critical of her, in your judgment?  
 25 MR. COLLAER: Objection; it calls for

1 speculation and opinion. If you have an opinion about  
 2 that, what he was thinking, go ahead.  
 3 THE WITNESS: I don't.  
 4 Q. (BY MR. SCHOPPE) You had no opinion as to  
 5 whether he was criticizing the Director or not?  
 6 A. No.  
 7 Q. At the all-staff meeting that occurred in  
 8 November 2011, was it your impression the staff,  
 9 including the O&A staff you spoke about earlier, they  
 10 were raising criticisms of how the Department and the  
 11 facility were being run by you and the Director?  
 12 A. I didn't hear that.  
 13 Q. You didn't hear criticism?  
 14 A. I heard criticism about different things, but  
 15 not criticism about myself or the Director.  
 16 Q. So that's your understanding as a personal  
 17 question. I'm speaking more about how the Department or  
 18 the facility were being managed as opposed to something  
 19 personal against you.  
 20 Did you understand that they were being  
 21 critical of how the Department was being managed?  
 22 MR. COLLAER: Object to the form of the  
 23 question; it's vague and calls for speculation as to the  
 24 state of mind of I don't know how many people, you  
 25 haven't identified.

1 Q. (BY MR. SCHOPPE) Asking about your  
 2 understanding, not anybody else's.  
 3 A. My understanding was that they were upset  
 4 about losing their ten-hour shifts, they were concerned  
 5 about the safety and security, we needed more staff.  
 6 They said we were passing over good people for  
 7 promotions. That's all I can remember.  
 8 Q. After that meeting and into 2012, is it  
 9 correct to say that 9 out of 12 or 9 out of 14 of the  
 10 O&A staff left the Department?  
 11 A. I don't know how many left.  
 12 Q. Is it fair to say some of them left?  
 13 A. Well, by the time I retired there had been a  
 14 couple. That's all I recall.  
 15 Q. Did anyone tell you, any one of those people  
 16 who did leave, tell you why they left?  
 17 A. Tell me why? No.  
 18 Q. Were any of those people terminated?  
 19 A. Terminated?  
 20 Q. Yes.  
 21 A. After the 2011 all-staff meeting?  
 22 Q. That's right.  
 23 A. Tom Knoff, the O&A supervisor, was terminated.  
 24 Q. Anybody else?  
 25 A. Well, Julie McCormick. That's all I can

1 recall.  
 2 Q. Anyone else in the O&A staff?  
 3 A. Terminated? Not that I can think of.  
 4 Q. How about disciplined, anyone in O&A staff  
 5 disciplined after that?  
 6 A. Disciplined after what?  
 7 Q. After the all-staff meeting in November 2011.  
 8 A. I don't know.  
 9 Q. Why was Tom Knoff terminated?  
 10 A. Tom Knoff was terminated because of Tom  
 11 Knoff's failure to follow directives, his failure to  
 12 properly supervise and oversee his staff and his unit.  
 13 Q. Did he ever express any concerns to you about  
 14 improper hiring practices at the facility?  
 15 A. Tom Knoff?  
 16 Q. Yes.  
 17 A. Not that I recall.  
 18 Q. Did he ever express any concerns to you about  
 19 unsafe conditions at the facility?  
 20 A. I don't recall Tom Knoff talking to me about  
 21 unsafe conditions.  
 22 Q. To your knowledge, has anyone from any other  
 23 JCC, whether Lewiston or St. Anthony, expressed the  
 24 opinion that JCC-Nampa is a dangerous facility?  
 25 A. Not that I'm aware.

1 Q. Or they felt unsafe there?  
 2 A. No, sir.  
 3 Q. Do you recall if anyone from O&A resigned  
 4 after the November 2011 meeting?  
 5 A. The resignations that I remember were Todd  
 6 Inman resigned, Diane Carnell resigned. That's all I  
 7 can think of.  
 8 Q. Did either of them ever tell you why they  
 9 resigned?  
 10 A. Tell me? No, sir.  
 11 Q. Did anyone ever tell you why they had  
 12 resigned?  
 13 A. No, sir.  
 14 Q. You never heard anything one way or the other?  
 15 A. No.  
 16 Q. After Tom Knoff was terminated, what was the  
 17 position that he held when he was terminated?  
 18 A. What was what?  
 19 Q. The position that he held at the time he was  
 20 terminated.  
 21 A. Rehab tech supervisor.  
 22 Q. Is it correct to say that he had previously  
 23 been unit manager for O&A?  
 24 A. A couple years before, yeah.  
 25 Q. Then is it fair to say that unit manager

1 position had been removed or phased out or something  
 2 like that?  
 3 A. What I recall is that there was a holdback,  
 4 our department had to lay off quite a few positions to  
 5 meet that holdback. At the time there was a study done  
 6 by our human resource officer, and I don't remember if  
 7 that was Ms. Cloud or not, but it was human resources,  
 8 and the report that the Director and I got was that when  
 9 they looked at the unit manager roles and  
 10 responsibilities, Tom Knoff was not functioning as a  
 11 unit manager. And so he was demoted, if you will, back  
 12 to supervisor and...  
 13 Q. The unit manager position was never filled?  
 14 A. No, it wasn't.  
 15 Q. After Mr. Knoff was terminated, was this  
 16 around May or June of 2012?  
 17 A. I don't know. I don't remember.  
 18 Q. Does that sound about right?  
 19 A. I know it was some time -- warm weather.  
 20 Q. I'm sorry, what?  
 21 A. It was warm weather. That's all I can  
 22 remember.  
 23 Q. What happened to the unit manager position at  
 24 that point?  
 25 A. I'm trying to remember. At some point in time



1 there was a reclassification done and that's how we got  
 2 the unit manager position back. I think I'm recalling  
 3 that right.  
 4 Q. Do you know who made the reclassification  
 5 decision?  
 6 A. I can't remember.  
 7 Q. Do you know if this was during the hiring  
 8 freeze?  
 9 A. No.  
 10 Q. After it was reclassified was someone  
 11 appointed or assigned to fill that?  
 12 A. I don't remember.  
 13 Q. Do you recall if Laura Roters was hired for  
 14 that position?  
 15 A. Hired for what position?  
 16 Q. For the unit manager position after it was  
 17 reclassified.  
 18 A. Laura Roters was already a unit manager.  
 19 Q. I'm talking about for O&A. At some point did  
 20 she become the supervisor in O&A?  
 21 A. I moved her to O&A, yes, sir.  
 22 Q. When was that?  
 23 A. When Tom Knoff was terminated.  
 24 Q. Did she fill the same position that he had had  
 25 at that time when he was terminated?

1 out. So I can't give you a time factor, okay. It's  
 2 going to depend upon the juvenile and his or her  
 3 behavior.  
 4 Q. Whose judgment, who made the call one way or  
 5 the other as to what a sufficient amount of time would  
 6 be in any given instance?  
 7 A. It could be the staff, it could be the  
 8 supervisor.  
 9 Q. Anyone who worked in O&A?  
 10 A. Yeah.  
 11 Q. As far as children's rights being violated,  
 12 was there a legal standard you were applying or was it a  
 13 performance-based standard criteria; what was that?  
 14 A. Our department is about rehabilitation, and  
 15 you cannot rehabilitate a child when you've got a door  
 16 between you and him or her, okay. And so if their  
 17 behavior was under control and they were not a threat,  
 18 as I've just spoken to, then you can't leave them locked  
 19 in their room.  
 20 Q. What I'm asking is, you indicated this was a  
 21 violation of the children's rights. So I'm trying to  
 22 find out what the measuring stick is, what is the  
 23 standard by which it's determined that there is too much  
 24 room time or not enough room time. Is there a guideline  
 25 that's published somewhere, is it a performance-based

1 A. That and more.  
 2 Q. What was the "more"?  
 3 A. Restructure, if you will, of the unit. She  
 4 was mentoring and training staff, role playing for them  
 5 how to work with kids.  
 6 Q. What was the restructuring of the unit?  
 7 A. Laura Roters ensured that the staff that she  
 8 worked with down in O&A understood how to work with  
 9 children. She ensured their rights were not violated.  
 10 By that I meant she ensured they were not isolated,  
 11 segregated without cause. She developed objectives for  
 12 her staff to meet.  
 13 Q. Before she became unit manager had there been  
 14 violations of rights of juveniles in that unit?  
 15 A. In O&A?  
 16 Q. Yes.  
 17 A. Yes, sir.  
 18 Q. What were those violations?  
 19 A. Excessive room time.  
 20 Q. What were the criteria by which excessive room  
 21 time was measured? In other words, was there a standard  
 22 that was applied?  
 23 A. A child was put in his room if there was a  
 24 cause for concern for safety and well-being. Once there  
 25 was no longer a cause or a concern, they needed to come

1 standard or law?  
 2 A. That data does come out twice a year from PbS.  
 3 It shows the amount of room time, if you will. And you  
 4 can look at that data, you can look at it as it stands  
 5 on a national level. You can also look at it as it  
 6 compares to the other units within the facility.  
 7 Q. Is there a recommended amount of room time  
 8 anywhere in those PbS reports or data, or anything like  
 9 that?  
 10 A. I don't recall there being a recommended  
 11 amount of time. Again, you are there to work with the  
 12 child, okay. They shouldn't go into their room to be  
 13 isolated and segregated, okay, unless the behavior  
 14 warrants it or unless it's bedtime.  
 15 Q. What was O&A doing with respect to room time  
 16 prior to Ms. Roters being sent in?  
 17 A. They were putting kids in their rooms and  
 18 locking them down while they had a team meeting, they  
 19 would put them in their rooms after dinner and leave  
 20 them there for an hour while they ordered in pizza and  
 21 things like this.  
 22 Q. Who said that was happening?  
 23 A. It was being reported to me, but I cannot  
 24 remember by who. Every report I always followed up.  
 25 Q. Was room time at the facility above average



1 for the PbS data that you were seeing?  
 2 A. In O&A, yes, sir.  
 3 Q. Is that comparing O&A units in other juvenile  
 4 corrections facilities nationwide?  
 5 A. Yes, sir.  
 6 Q. Do most facilities have similar observation  
 7 and assessment units?  
 8 A. Not all.  
 9 Q. Did anyone, Tom Knoff or any other people  
 10 working in O&A, ever offer an explanation as to why room  
 11 time was maybe necessary or above average room time  
 12 being necessary?  
 13 A. Not that I recall.  
 14 Q. Did Tom Knoff ever offer an explanation for  
 15 that?  
 16 A. No.  
 17 Q. Did the fact that the room time was above  
 18 average according to the national data mean it was  
 19 excessive?  
 20 A. There was a concern.  
 21 Q. Whose concern was that?  
 22 A. Mine, the Director's, other people. Because,  
 23 I mean, the data was there. And when you looked at room  
 24 time for Choices and Solutions, it was nothing like what  
 25 it was in O&A.

1 Q. Did the way that O&A staff were dealing with  
 2 juveniles in terms of lockdown that you were just  
 3 talking about, was that any different from how it had  
 4 been for your prior years as a superintendent; is there  
 5 anything new that came up?  
 6 A. Prior to me being superintendent?  
 7 Q. Prior to the time when Ms. Roters was sent in  
 8 to restructure things, back to when you were appointed  
 9 as superintendent, was that any different from how it  
 10 was when you first started?  
 11 A. I don't recall.  
 12 Q. You don't recall if anything changed?  
 13 A. I know that room time and restraints went down  
 14 when I sent Ms. Roters to O&A.  
 15 Q. Was there any concern that the Department's  
 16 image in terms of PbS rankings would be tarnished by  
 17 excessive room time?  
 18 A. I don't believe that.  
 19 Q. Did room time have any effect, or excessive  
 20 room time have any effect on funding for the Department  
 21 from any source?  
 22 A. Not that I'm aware of.  
 23 Q. Did any employees ever report any concerns to  
 24 you or did you hear any concerns that the juveniles were  
 25 not getting enough room time after violent assaults, for

1 example?  
 2 A. As I said before, there were a lot of  
 3 complaints coming from O&A staff about the kids, the  
 4 number of restraints. They didn't feel that the  
 5 juveniles were getting consequence as they should. And  
 6 Director Harrigfeld sent Monty Prow to Nampa to work  
 7 with Tom Knoff and his staff, and they developed a  
 8 behavioral program. All of the O&A staff were trained  
 9 to it, so that when a child acted out, it was clearly  
 10 defined the steps that would be taken to ensure that  
 11 every child was treated the same.  
 12 All of Tom's staff were trained to this new  
 13 approach that they were going to be using. A lot of the  
 14 staff in O&A even after the training did not like it.  
 15 They made it very clear to me and anybody else that  
 16 would listen that they wanted kids locked down when they  
 17 misbehaved.  
 18 Q. When they said "misbehaved," what did they  
 19 mean?  
 20 A. If one hit the other, if one assaulted a  
 21 staff.  
 22 Q. What was the standard protocol to follow after  
 23 a juvenile assaulted another juvenile or assaulted a  
 24 staff member?  
 25 A. Again, they would be placed in their room,

1 there would be steps that would be taken by staff. The  
 2 juvenile that was assaulted or the staff that was  
 3 assaulted was given the option of filing charges. If  
 4 they wanted to file charges, then law enforcement would  
 5 be contacted and they would come out.  
 6 Q. What were the steps that were taken with the  
 7 juvenile who was placed in their room?  
 8 A. There were things he or she had to accomplish.  
 9 Q. Like what?  
 10 A. I don't remember. It was some written work  
 11 they had to do. I don't remember.  
 12 Q. Was there anything called a reintegration  
 13 contract or something like that?  
 14 A. I don't remember.  
 15 Q. Do you know how long that process would  
 16 typically take?  
 17 A. How what?  
 18 Q. How long; would it be a day-long process or an  
 19 hour?  
 20 A. It was up to the juvenile and his or her  
 21 behavior and completing what they needed to complete to  
 22 be able to come out of their room.  
 23 Q. So if a juvenile were to work quickly enough,  
 24 could they be out in a short period of time?  
 25 A. I really don't know how to answer that because

1 that was really between the juvenile and the staff.  
 2 Q. Did any staff anywhere in the facility express  
 3 concern to you or did you hear about concerns being  
 4 expressed that juveniles were not getting enough  
 5 lockdown time after violent incidents?  
 6 A. I heard that.  
 7 Q. Did you hear there were concerns that in being  
 8 reintegrated into the population too quickly after an  
 9 incident could jeopardize the safety of other juveniles  
 10 and staff?  
 11 A. I recall hearing that.  
 12 Q. Did you look into those reports at all or have  
 13 an opinion one way or the other?  
 14 A. I don't recall.  
 15 Q. Going back to your legal training in the  
 16 context of CRIPA, Civil Rights of Institutionalized  
 17 Persons Act, is it your understanding that CRIPA  
 18 requires that juveniles or incarcerated people have a  
 19 right to be protected against violence?  
 20 A. Correct.  
 21 Q. And that they shouldn't be exposed to  
 22 potential violent aggressors?  
 23 A. Correct.  
 24 Q. So did anyone express a concern to you that  
 25 the rights of juveniles who were perhaps victims of

1 violent assaults were being jeopardized by reintegrating  
 2 violent juveniles too quickly?  
 3 A. I don't recall that.  
 4 Q. Was that a concern of yours?  
 5 A. Was it a concern of mine?  
 6 Q. Yes.  
 7 A. My concern was I didn't want assaults, okay.  
 8 Of course it was a concern of mine. But was I going to  
 9 be able to prevent them? Probably not.  
 10 Q. After Mr. Knoff was terminated did he threaten  
 11 to sue the department, as far as you know?  
 12 A. I think he -- what I recall is that he went to  
 13 the Idaho Personnel Commission. And that's all I know.  
 14 Q. You don't know what outcome, what came out of  
 15 that?  
 16 A. No, I don't.  
 17 Q. Do you know anything about a lawsuit by Diana  
 18 Floyd Miller?  
 19 A. Oh, gosh.  
 20 MR. COLLAER: It's a "yes" or "no." If you  
 21 do, you do.  
 22 THE WITNESS: I know of it. But it's been so  
 23 long ago, I probably couldn't answer a question.  
 24 Q. (BY MR. SCHOPPE) Do you recall what her  
 25 allegations were in the lawsuit?

1 A. No, sir.  
 2 Q. Do you recall what the outcome of that lawsuit  
 3 might have been?  
 4 A. I don't recall.  
 5 Q. How about Belinda Peterson, are you aware of a  
 6 lawsuit by her?  
 7 A. I do.  
 8 Q. Do you recall what the allegations were?  
 9 A. Allegations were -- all I remember is that  
 10 Belinda Peterson slipped on a rock in the parking lot.  
 11 And I went and testified before the, I think it was the  
 12 Personnel Commission. That was a long time ago.  
 13 Q. Have you ever testified in any other  
 14 proceeding? I know we had asked about depositions  
 15 before, but any court proceedings?  
 16 A. No.  
 17 Q. Any other proceedings like the one that you  
 18 just mentioned?  
 19 A. Ms. Peterson?  
 20 Q. Yes.  
 21 A. Not that I recall.  
 22 Q. Did you give any testimony in connection with  
 23 the criminal case against Ms. McCormick?  
 24 A. No. Wait a minute. I did talk to our  
 25 lawyers.

1 MR. COLLAER: He's talking about like here  
 2 with a court reporter in court testifying.  
 3 THE WITNESS: No.  
 4 Q. (BY MR. SCHOPPE) Did you ever submit any  
 5 sworn statements in connection with the charges against  
 6 Ms. McCormick?  
 7 A. No.  
 8 Q. How about in the action by Ms. Peterson?  
 9 MR. COLLAER: Other than the testimony she  
 10 just mentioned earlier?  
 11 MR. SCHOPPE: Yes.  
 12 Q. (BY MR. SCHOPPE) Like an affidavit or  
 13 anything like that?  
 14 A. No.  
 15 Q. What was the outcome of that Peterson lawsuit?  
 16 A. I don't know.  
 17 Q. Did that come about while you were the  
 18 superintendent?  
 19 A. Right after I became superintendent, I  
 20 believe.  
 21 Q. Was the incident that she was complaining  
 22 about, that happened before you became superintendent?  
 23 A. I don't think so. I think it was after.  
 24 Q. Have you offered any testimony or sworn  
 25 statement in connection with the claim by [REDACTED]

1 against the Department?  
 2 A. No.  
 3 Q. Do any provisions of the Idaho Administrative  
 4 Procedures Act apply to how the facility is to be run?  
 5 MR. COLLAER: Objection; calls for a legal  
 6 conclusion. If you know, go ahead.  
 7 THE WITNESS: No, I don't know.  
 8 Q. (BY MR. SCHOPPE) As far as you know.  
 9 A. I don't know.  
 10 Q. Are you aware of whether there are  
 11 administrative procedures, IDAPA, that are tied to the  
 12 Idaho Juvenile Corrections Act?  
 13 MR. COLLAER: If you know.  
 14 THE WITNESS: I don't know.  
 15 Q. (BY MR. SCHOPPE) Are you aware of whether the  
 16 IDAPA applies to detention centers?  
 17 MR. COLLAER: Same objection; calls for a  
 18 legal conclusion.  
 19 THE WITNESS: I know there are IDAPA rules.  
 20 That's all I know.  
 21 Q. (BY MR. SCHOPPE) When you were managing  
 22 JCC-Nampa, were you aware of any particular set of rules  
 23 or guidelines that you had to look to in running the  
 24 place, whether with respect to hiring decisions or  
 25 protecting juveniles? You testified about CRIPA and

1 written, does it need to be changed, if so, how.  
 2 Following that review a draft would be  
 3 submitted with the new changes. It was given a period  
 4 of time, if I recall right, before it became the new  
 5 policy.  
 6 Q. As far as you know, was that same process  
 7 followed every time a policy was changed?  
 8 A. Oh, yeah. You couldn't just change a policy  
 9 and procedure without going through all that.  
 10 Q. As far as you were concerned, were all the  
 11 policies that were in place for operation of the  
 12 Department, were those actually followed in practice?  
 13 A. There were times that it probably wasn't.  
 14 Q. Anything come to mind?  
 15 A. There is a policy about visitation, that the  
 16 visitor is supposed to be able to show identification.  
 17 I remember an issue was raised at the Nampa facility  
 18 because we had some Hispanic people coming in and they  
 19 wouldn't have identification. I brought this up to the  
 20 Director and to my peers. There was discussion about  
 21 the fact that our department works so hard to include  
 22 families in the treatment of the juveniles, encouraging  
 23 them from the get-go to be a part of their treatment.  
 24 It was felt that perhaps some of those people didn't  
 25 have identification because they were perhaps here

1 PREA and things like that. Were there any  
 2 administrative rules that you needed to apply?  
 3 MR. COLLAER: Are you referring to IDAPA rules  
 4 or other laws?  
 5 MR. SCHOPPE: Anything.  
 6 THE WITNESS: I'm not sure I understand the  
 7 question.  
 8 Q. (BY MR. SCHOPPE) Did you have a rule book or  
 9 anything like that that you looked to when you needed to  
 10 decide what --  
 11 A. A rule book?  
 12 Q. Yes. When you had to figure out what to do,  
 13 how to do things.  
 14 A. Well, there were policies and procedures.  
 15 Q. How were those policies and procedures formed?  
 16 A. Wow. It was quite a process. There was a  
 17 committee within the Department, and it was the IPPS  
 18 committee, the Internal Policy and Procedures System.  
 19 That committee consisted of the three superintendents,  
 20 the Director, HR, and legal.  
 21 On a monthly basis policies and procedures  
 22 would be reviewed. It was only following a review that  
 23 we would be working with our staff while the policy and  
 24 procedure was being reviewed, getting their feedback; do  
 25 you have a problem with this policy the way it's

1 illegally, and we didn't feel like that we were the  
 2 Border Patrol. And there was already a very good  
 3 process in place for approving who could visit a child.  
 4 That was done right after commitment. So there's my  
 5 answer.  
 6 Q. Did Dr. Richard Pines have a role at the  
 7 facility at some point?  
 8 A. Have a what?  
 9 Q. A role at the facility.  
 10 A. No, sir, he did not.  
 11 Q. Did he treat or visit juveniles?  
 12 A. Yes, sir.  
 13 Q. How so?  
 14 A. What I can tell you that I know about  
 15 Dr. Pines is on a professional level. Dr. Pines was the  
 16 contract psychiatrist for Northwest Children's Home in  
 17 Lewiston and Syringa House in Nampa. Dr. Pines, I  
 18 believe, had foster children in his home. And there was  
 19 a juvenile in the Nampa facility that Dr. Pines would  
 20 come and visit.  
 21 Q. Is that [REDACTED]?  
 22 A. [REDACTED].  
 23 Q. Was [REDACTED] a foster child of his?  
 24 A. I don't remember.  
 25 Q. So in his role as the contract psychiatrist

1 with Syringa House for the Nampa facility and --  
 2 A. No, not Nampa. He was not the contract  
 3 psychiatrist for Nampa.  
 4 Q. Can you tell me again then, I must have  
 5 misheard.  
 6 A. He was a contract psychiatrist for Northwest  
 7 Children's Home in Lewiston, Idaho and he was the  
 8 contract psychiatrist for Syringa in Nampa.  
 9 Q. All right. In that capacity did he do any  
 10 work at all for the Department?  
 11 A. He saw children that were in our custody.  
 12 Q. Did he see them in the facility or somewhere  
 13 else?  
 14 A. Northwest Children's Home or Syringa.  
 15 Q. So the juveniles would be transported out of  
 16 the facility to his office?  
 17 A. No. No. I'm not making this very clear.  
 18 Q. Maybe I'm just dense.  
 19 A. Sorry. He would see IDJC kids. Now, IDJC  
 20 would look at the risks and needs of a juvenile to find  
 21 the appropriate placement for that child. That child  
 22 would stay in our custody, but he might go to Northwest  
 23 Children's Home to do a program there. If he was at  
 24 Northwest Children's Home and he had a psychiatric need,  
 25 Dr. Pines would see him. But Dr. Pines did not come

1 into the Nampa facility on a professional level as a  
 2 doctor.  
 3 Q. All right. I get that now.  
 4 The same thing applies for the Syringa House?  
 5 A. Correct.  
 6 Q. Was Dr. Pines a friend of yours in any  
 7 respect?  
 8 A. No.  
 9 Q. Did you ever tell anyone that he was a friend  
 10 of yours?  
 11 A. No, sir, I don't believe I did. I was accused  
 12 of saying that, but I followed up with the people that  
 13 were at a meeting, a morning briefing, when I talked  
 14 about Dr. Pines and what I knew of Dr. Pines.  
 15 Q. What did you talk about there?  
 16 A. What I've just told you, that I knew him while  
 17 he worked at Northwest Children's Home, I met him there  
 18 many, many years ago when I was a nurse manager. I saw  
 19 him another time, I believe it was at Northwest  
 20 Children's Home again, because part of my job as the  
 21 nurse manager, I did annual quality improvement reviews  
 22 on our contract providers.  
 23 And then the only other time I had any  
 24 professional contact with Dr. Pines, I called him one  
 25 time many years ago to see if he would contract with our

1 department to provide the psychiatric care for the  
 2 children in the Lewiston facility since he was already  
 3 working for Northwest Children's Home in Lewiston. But  
 4 he turned me down because he said his practice was too  
 5 big. Our Lewiston facility psychiatric care was done  
 6 largely by telemedicine.  
 7 Q. When this came up in this meeting you  
 8 mentioned with employees, when was that?  
 9 A. It was at a morning briefing. My nursing  
 10 supervisor asked a question about Dr. Pines coming in to  
 11 visit [REDACTED]. I had already spoken with Nancy Bishop,  
 12 and Nancy's counsel to me was that --  
 13 MR. COLLAER: Hold it. Don't say anything  
 14 that Nancy Bishop told you.  
 15 THE WITNESS: I can't say any more.  
 16 Q. (BY MR. SCHOPPE) How did the issue come up;  
 17 why was Dr. Pines an issue at the meeting in the first  
 18 place?  
 19 A. I don't remember why it came up.  
 20 Q. Are you aware that he was charged with lewd  
 21 conduct with minors before the Board of Medicine?  
 22 MR. COLLAER: At what point in time?  
 23 MR. SCHOPPE: Well, just generally.  
 24 Q. (BY MR. SCHOPPE) As you sit here now are you  
 25 aware that charges were filed?

1 A. I am now, but I wasn't.  
 2 Q. I don't think we nailed down quite when it  
 3 was. I think it might have been in April 2012, around  
 4 then.  
 5 A. I don't remember. I don't remember. But  
 6 again, when Dr. Pines came in to Nampa to visit [REDACTED].  
 7 what I recall is that he had not been charged with  
 8 anything.  
 9 Q. Now, would at least springtime of 2012 be a  
 10 safe bet for the timing of this meeting?  
 11 MR. COLLAER: Objection; calls for  
 12 speculation. If you recall, that's fine, but don't  
 13 guess.  
 14 THE WITNESS: I can't.  
 15 Q. (BY MR. SCHOPPE) Had someone raised a concern  
 16 about his contact with juveniles?  
 17 A. I don't remember.  
 18 Q. So what was discussed at the meeting with the  
 19 employees?  
 20 A. I know that Ms. Angel asked a question about  
 21 Dr. Pines coming in to see kids.  
 22 Q. Was she the nursing supervisor you mentioned?  
 23 A. Yes.  
 24 Q. What was her question?  
 25 A. It was about should he or could he, best I can



1 recall.  
 2 Q. Did you understand why she was asking at the  
 3 time?  
 4 A. I don't remember exactly what she said.  
 5 Q. But it's not quite what I had asked. Do you  
 6 remember why she was asking?  
 7 A. No, I don't. I don't remember.  
 8 Q. Did she or anybody else tell you why they were  
 9 asking about whether Dr. Pines should be allowed in the  
 10 facility?  
 11 A. There had been rumors. That's all I can tell  
 12 you.  
 13 Q. Who said that?  
 14 A. I don't remember.  
 15 Q. Are you saying someone told you there were  
 16 rumors or you had heard rumors?  
 17 A. I had heard rumors.  
 18 Q. You don't remember who you heard them from?  
 19 A. No.  
 20 Q. What were the rumors?  
 21 A. That Health and Welfare was looking at him  
 22 about possible inappropriate behavior.  
 23 Q. With juveniles?  
 24 A. I believe so.  
 25 Q. With minors at least?

1 A. I believe so.  
 2 Q. Do you recall when you heard the rumors?  
 3 A. No, I don't.  
 4 Q. Is it fair to say that you heard those rumors  
 5 prior to this meeting with Ms. Angel and others?  
 6 A. I don't remember.  
 7 Q. Were you surprised by her questioning?  
 8 A. Surprised?  
 9 Q. Yes. Or did it make sense to you at the time?  
 10 A. I don't recall if it made sense. I answered  
 11 her.  
 12 Q. What was your answer to her?  
 13 A. I shared with my staff that were at the  
 14 morning briefing what my legal counsel had told me.  
 15 Q. So you talked about that in front of  
 16 everybody?  
 17 A. I did.  
 18 **MR. SCHOPPE: Well, I want to ask, since she**  
 19 **spoke about it publicly, we --**  
 20 **MR. COLLAER: No. She's talking to the staff**  
 21 **and it's still legal advice. She is relating legal**  
 22 **advice as to how they are going to handle a situation.**  
 23 **So it's still privileged and we are not going to let her**  
 24 **answer.**  
 25 **MR. SCHOPPE: All right.**

1 **MR. COLLAER: It's a quarter after 2:00,**  
 2 **Counsel. We've been going for about an hour and a half**  
 3 **now.**  
 4 **MR. SCHOPPE: Sure.**  
 5 **(Recess taken from 2:21 to 2:43 p.m.)**  
 6 Q. (BY MR. SCHOPPE) After the staff meeting that  
 7 you discussed Dr. Pines, did Dr. Pines again visit the  
 8 facility?  
 9 A. Did he visit again?  
 10 Q. Yes.  
 11 A. I don't recall.  
 12 Q. You don't recall if he visited [REDACTED] again  
 13 as late as July 2012?  
 14 A. I don't recall.  
 15 Q. Do you recall authorizing an overnight stay  
 16 for [REDACTED] at Dr. Pines' home at any time in 2012?  
 17 A. When?  
 18 Q. 2012.  
 19 A. Not that I recall.  
 20 Q. Did you tell staff that Dr. Pines could not  
 21 visit the facility or that he could, or what was the  
 22 outcome of the meeting?  
 23 A. I did not tell the staff he could not visit.  
 24 Q. So there were no restrictions placed on his  
 25 visit?

1 A. No.  
 2 Q. So no restrictions were placed on his visit or  
 3 no special supervision requirements?  
 4 **MR. COLLAER: Objection; that misstates her**  
 5 **testimony. Go ahead.**  
 6 **THE WITNESS: All visits are supervised. \***  
 7 Q. (BY MR. SCHOPPE) There was no concern about  
 8 any of the allegations against him, that he might hurt  
 9 or victimize [REDACTED]?  
 10 A. I don't recall that coming up.  
 11 Q. Do you recall that being expressed by any of  
 12 the staff at any point during or after that meeting?  
 13 A. I don't recall.  
 14 Q. Let's focus on the time period after the  
 15 all-staff meeting in November of 2011. Did any employee  
 16 tell you that they feared for their safety at the Nampa  
 17 facility?  
 18 **MR. COLLAER: Objection; I believe that has**  
 19 **been asked and answered. But go ahead and answer again.**  
 20 **THE WITNESS: Yeah, I think I've already**  
 21 **answered that. I used to hear concerns all the time**  
 22 **from the staff in O&A.**  
 23 Q. (BY MR. SCHOPPE) Do you know who all the  
 24 Plaintiffs are in this matter?  
 25 A. No, sir, I don't.



1 Q. I'll read you a list. It's Ray Gregston,  
 2 Rhonda Ledford, Shane Penrod, Lisa Littlefield, Gracie  
 3 Reyna, Frank Farnworth, Tom de Knijf, Addison Fordham,  
 4 Jo McKinney, and Kim McCormick. Are those names  
 5 familiar to you? Those are the group of Plaintiffs.  
 6 And initially Philip Gregston, Diana Carnell, and Bob  
 7 Robinson had also been Plaintiffs.  
 8 Did any of those people at any point after  
 9 November 2011 all the way up until you left the  
 10 Department express concerns to you about their safety?  
 11 A. Not that I recall.  
 12 Q. How about any other employee?  
 13 A. Not that I recall.  
 14 Q. With respect to the same group of Plaintiffs,  
 15 did any of them express any concerns to you about waste  
 16 of public resources by the Department?  
 17 A. What?  
 18 Q. Waste of public resources, waste of money,  
 19 things like that.  
 20 **MR. COLLAER: Again your question is limited**  
 21 **to the Plaintiffs that are named on the Second Amended**  
 22 **Complaint?**  
 23 **MR. SCHOPPE: Correct.**  
 24 **THE WITNESS: I don't recall.**  
 25 Q. (BY MR. SCHOPPE) How about with respect to

1 any other employees?  
 2 A. Not that I remember.  
 3 Q. Did anyone ever express any concern to you  
 4 among the Plaintiffs about time card padding by certain  
 5 employees at the Department?  
 6 A. Did anyone come to me? No, sir.  
 7 Q. Did you ever hear anything about that?  
 8 A. I did.  
 9 Q. What did you hear?  
 10 A. Just that, that there were people padding  
 11 their time sheets.  
 12 Q. Did you look into that?  
 13 A. I want to say I recall talking about time  
 14 sheets in a management meeting, which would have been  
 15 attended by all of my supervisors.  
 16 Q. Did you find that anyone was falsifying time  
 17 cards or time records?  
 18 A. I did not.  
 19 Q. How about Roberto Coronado?  
 20 A. What about Roberto?  
 21 Q. Was he falsifying any time records?  
 22 A. Not that I'm aware.  
 23 Q. What did you do to investigate the issue, if  
 24 anything?  
 25 A. Talk to the supervisor.

1 Q. Did you review any time sheets or anything  
 2 like that or pay records of any kind?  
 3 A. No.  
 4 Q. Did you tell anybody to do that?  
 5 A. To?  
 6 Q. To investigate those allegations.  
 7 **MR. COLLAER: Are you talking about a specific**  
 8 **allegation regarding Mr. Coronado?**  
 9 **MR. SCHOPPE: No, time cards generally, any**  
 10 **time card fraud in general.**  
 11 **MR. COLLAER: So you are past Mr. Coronado now**  
 12 **and talking generally?**  
 13 **MR. SCHOPPE: Yes.**  
 14 **THE WITNESS: No.**  
 15 Q. (BY MR. SCHOPPE) Is your answer the same as  
 16 it was in the previous question, understanding we are  
 17 talking about any allegations of time card fraud?  
 18 A. I heard it.  
 19 Q. Who did you hear it from?  
 20 A. It was more of a rumor. And I can't remember  
 21 who I heard the rumor from.  
 22 Q. Did you ever move anyone's office closer to  
 23 yours in order to keep a closer eye on them, make sure  
 24 they weren't leaving early or coming in late?  
 25 A. My office?

1 Q. No, not your office. Someone else's office.  
 2 A. Did I move someone close to my office?  
 3 Q. Right.  
 4 **MR. COLLAER: Read the rest of the question.**  
 5 **(Record read back.)**  
 6 **THE WITNESS: No, sir.**  
 7 Q. (BY MR. SCHOPPE) With respect to the  
 8 relationship that we discussed earlier between Bryce  
 9 Larson and [REDACTED] the juvenile, was any kind of a police  
 10 report made?  
 11 A. I do not recall, sir.  
 12 Q. Was [REDACTED] family notified?  
 13 A. Was [REDACTED] family notified?  
 14 Q. Right.  
 15 A. What I recall, sir, is it was [REDACTED] family  
 16 that made us aware of what was going on.  
 17 Q. I thought you had said that a probation  
 18 officer had made a call.  
 19 A. The probation officer called me, but the  
 20 mother of AH called the probation officer.  
 21 Q. Was any kind of PREA report or anything like  
 22 that filed?  
 23 A. There was an investigation. The report I got  
 24 from that investigation is that there was nothing of a  
 25 sexual nature had occurred, had not. It was more of

1 just Bryce violating policy by going to her home.  
 2 **Q.** Are you aware of any allegations or even  
 3 rumors involving sexual conduct between former employee  
 4 Valerie Lietau -- I'm not sure if I'm saying that right.  
 5 Does that ring a bell to you?  
 6 **A.** Yes.  
 7 **Q.** Are aware of any allegations of that nature?  
 8 **A.** With who?  
 9 **Q.** Between a juvenile and Ms. Lietau. Am I  
 10 saying that right, do you know?  
 11 **A.** I don't know. I never was very good at  
 12 pronouncing it myself.  
 13 **Q.** How about same concerns with Jackie Raymond,  
 14 also a former employee?  
 15 **A.** No. No.  
 16 **Q.** Any rumors or reports of any involving Marcy  
 17 Harris?  
 18 **A.** Marcy Harris was terminated and it had  
 19 something to do -- I don't recall it being of a sexual  
 20 nature, but she was visiting with juveniles. That's the  
 21 best I can recall.  
 22 **Q.** Is that while you were superintendent?  
 23 **A.** Yes.  
 24 **Q.** Was it the same sort of concerns that you had  
 25 had about Julie McCormick interacting with juveniles?

1 **A.** No. The report that I was getting was that  
 2 she was seeing juveniles outside of the facility.  
 3 **Q.** When you say "seeing," what do you mean?  
 4 **A.** I can't elaborate because I don't remember.  
 5 All I remember is her supervisor coming to me because he  
 6 had heard that, and when he talked to Ms. Harris she  
 7 admitted to seeing some kids.  
 8 **Q.** Was that juveniles that had been released?  
 9 **A.** I don't remember. Sorry.  
 10 **Q.** Anything involving a Ms. McLaine? I'm sorry,  
 11 I don't have a first name at the moment.  
 12 **A.** I can't even remember who that is.  
 13 **Q.** How about Lisa Bradley?  
 14 **A.** I never heard anything about Lisa.  
 15 **Q.** Have you heard anything about an incident  
 16 between Jennifer Watkins at the Lewiston facility  
 17 involving a minor?  
 18 **A.** No. And I don't even know who she is.  
 19 **Q.** With respect to Julie McCormick's  
 20 qualifications as a safety and security officer, isn't  
 21 it the case that Ms. McCormick had a criminal record?  
 22 **A.** Not that I was aware of.  
 23 **Q.** No one made you aware of misdemeanor charges  
 24 of criminal trespass or anything like that?  
 25 **A.** I take that back. In order for Julie to

1 become POST certified, if there were misdemeanors, I  
 2 wrote letters on behalf of the staff to the director at  
 3 POST letting the director know that I was aware of the  
 4 dog at large charge, the DUI, whatever it was, I would  
 5 speak briefly for the employee and I would end it by: I  
 6 respectfully request that you consider this person for a  
 7 waiver. So I do remember, but there was lot of that. I  
 8 mean, not with Julie, but I wrote a lot of letters.  
 9 **Q.** Was it only in the context of POST  
 10 certification?  
 11 **A.** Yes.  
 12 **Q.** Is there any rule or policy that prevents a  
 13 person with a criminal background from being hired as an  
 14 employee at the Department?  
 15 **A.** They cannot have a felony.  
 16 **Q.** What about with respect to misdemeanors?  
 17 **A.** That all depends what it is.  
 18 **Q.** What does it depend on? On what does it  
 19 depend?  
 20 **A.** Would whatever the charge pose a risk to the  
 21 safety and well-being of staff or children. Best answer  
 22 I can give you.  
 23 **Q.** How about charges of DUI, driving under the  
 24 influence?  
 25 **A.** Do what?

1 **Q.** Driving under the influence.  
 2 **A.** Misdemeanor?  
 3 **Q.** Any charge of driving under the influence.  
 4 **A.** We've had staff that were approved for  
 5 employment that had previous DUIs.  
 6 **Q.** Is there a process that they have to go  
 7 through for that?  
 8 **A.** I'm not sure I know what you're asking,  
 9 "process."  
 10 **Q.** Well, for example, is it the case that  
 11 employees or applicants for employment are required to  
 12 disclose convictions for misdemeanors or felonies or  
 13 things like that?  
 14 **A.** Yes, sir.  
 15 **Q.** If they have a felony, it sounds like they are  
 16 disqualified?  
 17 **A.** Right.  
 18 **Q.** But if they have a misdemeanor, they may still  
 19 be eligible for employment; is that right?  
 20 **A.** Right.  
 21 **Q.** What is the process that is gone through in  
 22 order to screen who might be eligible, who is not? If  
 23 you know. If you don't know, that's okay too.  
 24 **A.** I don't.  
 25 **Q.** Is that a human resources role?

1 A. Pretty much.

2 Q. How about for employees who are convicted of a  
3 misdemeanor? I presume that a felony conviction would  
4 get someone terminated immediately; is that right?

5 A. Yeah. And besides, if they have previous  
6 felonies they're not going to get hired to start with.  
7 If they commit a felony while they're working for us, I  
8 don't know of that ever happening, I would have to  
9 assume what would happen. I don't want to do that.

10 Q. All right.

11 A. As far as the misdemeanor question, you would  
12 look at every one of those individually. And in order  
13 to be waived by POST to become certified, you have to  
14 get all the court documents and everything that goes  
15 with whatever the charge was. That has to be presented.

16 Q. Can that process be engaged by non-POST  
17 certified employees or employees who don't require POST  
18 certification?

19 **MR. COLLAER: You are talking about a waiver?**

20 **MR. SCHOPPE: I'm not sure.**

21 Q. (BY MR. SCHOPPE) Just whatever, if someone is  
22 convicted of a misdemeanor and it doesn't have anything  
23 to do with their POST certification.

24 A. Again, it would be on an individual basis of  
25 the supervisor that wanted to make an offer to you, and

1 an employee had been convicted of a misdemeanor while  
2 you were the superintendent?

3 A. Again, Ms. Miles got a DUI. And there was a  
4 gentleman, but he doesn't work for us any more, he was  
5 safety and security on nights, he got in some kind of  
6 trouble. I think it was a battery or something. I  
7 can't really recall.

8 Q. What happened in that instance, the battery?

9 A. I don't remember, but I'm sure I would have  
10 contacted our legal people.

11 Q. Do you recall if there was any kind of  
12 disciplinary action?

13 A. I don't.

14 Q. Was there anything that would have restricted  
15 his contact with juveniles after that?

16 A. I don't recall.

17 Q. You mentioned earlier there was a series of  
18 meetings involving human resources and sometimes  
19 yourself as well as the Director with employees after  
20 the November 2011 all-staff meeting; is that right?

21 A. Correct.

22 Q. I understand you didn't attend all those  
23 meetings; right?

24 A. I only remember attending one.

25 Q. Just one?

1 you've got this misdemeanor in your background, would  
2 have to learn about it.

3 Q. Wasn't it the case that Diane Miles was  
4 convicted of a DUI offense?

5 A. I recall Ms. Miles getting a DUI while she was  
6 working for us, I do recall.

7 Q. What was her role at the Department; what was  
8 her job?

9 A. She was a transport officer.

10 Q. Did that seem to pose a problem to her duties  
11 as a transport officer?

12 A. Yes, sir. She could not transport.

13 Q. Did she lose her license?

14 A. They were suspended is what I recall.

15 Q. Any disciplinary action or anything like that  
16 taken against her?

17 A. By our department?

18 Q. Yes.

19 A. No, sir.

20 Q. Is disciplinary action an option in the event  
21 an employee is convicted of a misdemeanor offense?

22 **MR. COLLAER: Object to the form of the**  
23 **question; it's vague, calls for speculation.**

24 **THE WITNESS: I don't have an answer.**

25 Q. (BY MR. SCHOPPE) So did you ever learn that

1 A. And that's the one I told you about.

2 Q. Did you notice while you were the  
3 superintendent any change of any kind in the safety at  
4 JCC-Nampa between Director Callicutt and Director  
5 Harrigfeld; did safety improve, get worse, stay the  
6 same?

7 **MR. COLLAER: Object to the form of the**  
8 **question; it's vague and calls for speculation. If you**  
9 **can comment on that or answer it, go ahead.**

10 **THE WITNESS: I can't say I saw a change.**  
11 **They are both -- one was a good director and the other**  
12 **still is.**

13 Q. (BY MR. SCHOPPE) In terms of, let's focus on  
14 incidents of violence involving juveniles, was there any  
15 increase or decrease or stay the same as far as you  
16 know?

17 A. There was an increase.

18 Q. Do you know why that was?

19 **MR. COLLAER: Objection; calls for**  
20 **speculation, it's vague.**

21 **THE WITNESS: I don't know.**

22 Q. (BY MR. SCHOPPE) Did anyone look into why  
23 there might have been an increase?

24 A. I believe Tom Knoff looked into it, but I do  
25 not recall.

1 Q. Do you know what he did to look into it?  
 2 A. No, I don't.  
 3 Q. We would have to ask him?  
 4 A. Yes.  
 5 Q. When I asked you that question how did you  
 6 know whether there was an increase or not, is that based  
 7 on your own review of incident reports or things like  
 8 that?  
 9 A. Well, I worked at the facility, okay.  
 10 Q. Sure.  
 11 A. So I knew when there was an incident.  
 12 Q. Did you form any opinion of your own as to why  
 13 that was?  
 14 A. I had concerns, yes, sir.  
 15 Q. What were those concerns?  
 16 A. I had concerns that it might be prompted by  
 17 staff.  
 18 Q. How do you mean?  
 19 A. I was getting reports from Mr. Knoff that he  
 20 had a couple of staff that liked to get into power  
 21 struggles with kids, liked to push their buttons, if you  
 22 will, and one or two that were quick to get physical.  
 23 So it was very difficult when the rate increased for me  
 24 to determine was it a staff issue or was it a juvenile  
 25 issue. It was very difficult.

1 Q. Did you ever consider that it might be a  
 2 policy issue?  
 3 A. Policy?  
 4 Q. For example, with respect to room time or  
 5 lockdown or anything like that?  
 6 A. No.  
 7 Q. Did anyone ever express concerns to you that  
 8 juveniles were allowed to have contraband they should  
 9 not have had in the facility?  
 10 A. I know there were comments made, particularly  
 11 by safety and security staff because they were supposed  
 12 to be checking stuff that was coming in. And what I  
 13 remember is if they could have had their way, nothing  
 14 would have come in. When juveniles reached the highest  
 15 level in their program, one of the perks was they could  
 16 have Walgreens shampoo instead of the Bob Barker prison  
 17 shampoo and things like that.  
 18 Q. The what shampoo?  
 19 A. Bob Barker prison shampoo.  
 20 Q. Like the game show host?  
 21 A. Right.  
 22 Q. Sorry, first time I've heard that.  
 23 A. Bob Barker, it's a catalog and they carry all  
 24 the toiletries and clothing.  
 25 Q. Is there a policy that sets forth what

1 juveniles can and cannot have inside the facility?  
 2 A. Yeah. But it's specifically what is not  
 3 allowed; weapons, drugs, that kind of thing. As far as  
 4 when they got to that level that I just spoke to, that  
 5 was a staff decision. Juvenile would make a request to  
 6 staff, it would go before the team. Billy would like to  
 7 have a couple new shirts. Team would yea or nay it.  
 8 Q. Were there any items on that list that relate  
 9 to someone's ability to make that into an improvised  
 10 weapon?  
 11 A. "An improvised weapon"? I'm not sure I  
 12 understand the question.  
 13 **MR. COLLAER: I think the question was**  
 14 **something that restricted their ability to make weapons.**  
 15 **THE WITNESS: To make weapons?**  
 16 Q. (BY MR. SCHOPPE) Yes.  
 17 A. Well, they can't have sharp objects without  
 18 supervision, they can't --  
 19 Q. Is that policy followed or was that policy  
 20 followed during your time as superintendent?  
 21 A. There were a couple of times there were some  
 22 breaches in that.  
 23 Q. How do you mean "breaches"?  
 24 A. One time a shank was found. Another time  
 25 drugs came in in a bottle of shampoo, the drugs were in

1 a balloon in the bottle of shampoo. So there were some  
 2 breaches.  
 3 Q. As a matter of policy though was that policy  
 4 enforced at all times or were there exceptions made or  
 5 did it look different on paper than it really was in  
 6 practice?  
 7 **MR. COLLAER: Objection; the question is**  
 8 **compound and vague.**  
 9 **THE WITNESS: Safety and security was first**  
 10 **and foremost, always, by everybody that worked in that**  
 11 **facility. Were juveniles going to do things like make a**  
 12 **shank? Yeah. Were they going to try to bring in drugs?**  
 13 **Yes.**  
 14 Q. (BY MR. SCHOPPE) When items like weapons or  
 15 contraband like that were found, what was the policy  
 16 with how to deal with those?  
 17 A. It was investigated fully. The weapon  
 18 generally stayed locked in my office. I would notify  
 19 the Director. Myself and the supervisors would take  
 20 whatever steps were necessary to try to learn from it,  
 21 how did it happen. There might be consequences for the  
 22 juvenile or juveniles.  
 23 Q. Where were the items kept after they were  
 24 found; were they kept in a locker or an office or  
 25 something like that?



1 A. Well, the best example I can give you is the  
 2 recent shank during 2012 was kept locked in my office in  
 3 my desk.  
 4 Q. What is done with it otherwise; is it just  
 5 kept there indefinitely?  
 6 A. No, not indefinitely. Most of those things  
 7 after the investigation or whatever was going to be  
 8 done, the items were taken to the safety and security  
 9 supervisor and they were kept locked in a file cabinet.  
 10 And then I think eventually disposed of, is what I  
 11 recall.  
 12 Q. That would have been, at one point at least,  
 13 Julie McCormick's office?  
 14 A. Yes, sir.  
 15 Q. Are you aware of any incidents in which  
 16 juveniles were allowed unsupervised access to her  
 17 office?  
 18 A. Other than ██████ no, sir.  
 19 Q. Do you recall a juvenile by the name of ██████  
 20 ██████?  
 21 A. I do.  
 22 Q. Is it correct that he was placed in a program  
 23 that put him off-site in a private apartment?  
 24 A. I don't know about a private apartment, but I  
 25 recall it was very difficult and challenging finding a

1 program for ██████. ██████ had significant mental health  
 2 issues. But we did find a program locally that was  
 3 willing to work with him.  
 4 Q. What was that program?  
 5 A. I don't remember the name of it.  
 6 Q. At any point in time did you ever hand cash,  
 7 money to ██████ for any reason?  
 8 A. I did one time.  
 9 Q. What was that for?  
 10 A. I had gotten a call from the lady that ran the  
 11 program, I think it was. ██████ had just started going  
 12 and she had called me that the following day they were  
 13 taking, I think they referred to them as "clients," but  
 14 nonetheless, they were taking them to the zoo or  
 15 something. And as a result, ██████ was going to need  
 16 spending money. And she proceeded to tell me that ██████  
 17 was going to need spending money along the way, okay.  
 18 I called our fiscal department, talked to  
 19 Scott Johnson. There was no way fiscal could cut me a  
 20 check that afternoon; these things take time. I knew  
 21 that ██████ was going to be upset the next morning  
 22 because ██████ knew about the outing, he knew that he was  
 23 going to need money, and I knew if he got too upset,  
 24 there would be a big problem.  
 25 Q. What kind of problem?

1 A. Probably end up restraining him.  
 2 Q. Is he what you think of as a violent offender?  
 3 A. ██████ could bounce off a wall in a minute's,  
 4 moment's notice. ██████ as I said, had significant  
 5 mental health issues and ██████ worried, and when ██████  
 6 got worried there was trouble usually.  
 7 Q. So the money you gave ██████ was that your own  
 8 money or was that petty cash or something?  
 9 A. No, it was my own money.  
 10 Q. Isn't it fair to say it's against policy to  
 11 give --  
 12 A. It is.  
 13 Q. -- cash gifts?  
 14 A. It is. But I made the Director aware of what  
 15 I had done. When I talked to Mr. Johnson I told him  
 16 what I had done. And it did actually take the  
 17 Department quite a few weeks to get his spending money  
 18 set up because the program did not want that money  
 19 lumped in with the money for his program. They wanted  
 20 the spending money to be separate.  
 21 So was it against policy? Yes, sir. But  
 22 again, I just told you why I did it. And I only did it  
 23 once. And I didn't want ██████ wiggling out. I wanted  
 24 ██████ to be successful.  
 25 Q. Was ██████ allowed to go to GameStop or taken

1 there by transport officers?  
 2 A. To where?  
 3 Q. GameStop.  
 4 A. What is that?  
 5 Q. It's a game store for a gaming device. Do you  
 6 recall if he had a gaming device?  
 7 A. He had one, and there were restrictions on how  
 8 often he could have it. But as far as somebody taking  
 9 him to a store or something like that, I honestly don't  
 10 remember that.  
 11 Q. Are juveniles allowed Internet access or  
 12 e-mail inside the facility?  
 13 A. No.  
 14 Q. Do you know if that gaming device had Internet  
 15 capability?  
 16 A. I do not.  
 17 Q. Did the Department at some point purchase  
 18 furniture for ██████ at an outside facility?  
 19 A. I don't recall that.  
 20 Q. Do you recall why ██████ was incarcerated in  
 21 the first place?  
 22 A. No.  
 23 Q. Do you know if the Department paid for ██████  
 24 family's utility bills at some point?  
 25 A. I'm not aware of that.



1 Q. Did you ever tell anyone that if they were  
 2 opposed to Ms. Roters' hiring to replace Tom Knoff, did  
 3 you ever tell anyone that if they had a problem with  
 4 that they could seek employment elsewhere?  
 5 A. First of all, if I can correct you.  
 6 Ms. Roters was not hired, okay. Ms. Roters was a unit  
 7 manager in Choices and Solutions, okay. When Tom Knoff  
 8 was terminated, I moved Ms. Roters to O&A to support the  
 9 staff and to help the staff, because I knew that the  
 10 termination of Tom Knoff was going to upset those people  
 11 tremendously, and it did. So much so that there were  
 12 staff in O&A that were challenging Laura, were being  
 13 disrespectful to her, belligerent. And I went to a team  
 14 meeting on a Wednesday and I told the staff that were in  
 15 there that I expected them to respect Laura Roters and  
 16 to support her. And if they could not do that, then  
 17 they probably should go find another job. I did say  
 18 that.  
 19 Q. All right.  
 20 A. I made it very clear what my expectations  
 21 were.  
 22 Q. Did you tell them that they should use the  
 23 problem-solving process or any kind of other grievance  
 24 process in dealing with their concerns with Ms. Roters?  
 25 A. At the time that I met with them, that meeting

1 I just told you about, no, I didn't.  
 2 Q. Is that how the policy mandates with respect  
 3 to addressing employee concerns or disputes between  
 4 employees and supervisors?  
 5 A. That's what we're encouraged to use, yes.  
 6 Q. What is that?  
 7 A. The problem solving.  
 8 Q. With respect to your statement that they could  
 9 seek employment elsewhere, is that something that is  
 10 part of the grievance or dispute resolution process at  
 11 the Department?  
 12 A. Again, I made it very clear to the staff what  
 13 I expected of them. That's all I can tell you.  
 14 Q. What were the sort of challenges that staff  
 15 were making to Ms. Roters?  
 16 A. I don't recall. They were just disrespectful,  
 17 challenging her. It was bad.  
 18 Q. You don't recall any specifics of that, what  
 19 those challenges were? Do you know if they were  
 20 personal versus professional?  
 21 A. I don't recall.  
 22 Q. Do you recall who the staff in question were,  
 23 who the staff were that were belligerent or challenging  
 24 of her?  
 25 A. I know Ms. Reyna, Ms. Carnell. I can't

1 remember any others.  
 2 Q. What sort of things did you hear about  
 3 Ms. Reyna?  
 4 A. Laura would talk to her about something  
 5 Ms. Reyna did or didn't do and Ms. Reyna would get  
 6 angry, she would refuse to meet with Laura, she would  
 7 get belligerent. That's all I can tell you.  
 8 Q. Is that Ms. Roters' characterization of the  
 9 conduct?  
 10 A. That was Ms. Roters' report to myself and to  
 11 human resources.  
 12 Q. Did you ever speak with Ms. Reyna about those  
 13 issues?  
 14 A. I did not.  
 15 Q. Do you know if anyone did?  
 16 A. I do not.  
 17 Q. How about Ms. Carnell, what sort of things  
 18 were you hearing about her?  
 19 A. Basically the same thing.  
 20 Q. Did you ever speak with her directly about it?  
 21 A. No, sir.  
 22 Q. What happened after you told employees that if  
 23 they didn't support Ms. Roters they could seek  
 24 employment elsewhere?  
 25 A. What happened? There were a lot of changes in

1 O&A that came about, schedule changes, the structure  
 2 down there. A lot of changes. But they were good  
 3 changes. By that I meant that the number of restraints  
 4 started declining. They were good changes.  
 5 Q. Did employees leave after that point?  
 6 A. Some left, yes, sir.  
 7 Q. Did you feel you had strengthened Ms. Roters'  
 8 position in the Department after saying that?  
 9 A. Did I feel what?  
 10 Q. That you had strengthened Ms. Roters' position  
 11 in the Department after you had made that statement.  
 12 A. I don't know that I would put it that way. I  
 13 made it very clear that Laura Roters had my support, as  
 14 I did with all of my staff.  
 15 Q. Are you aware of any instances in which  
 16 Ms. Roters failed to report a PREA incident that was  
 17 reported to her?  
 18 A. Failed to do what?  
 19 Q. To report a PREA incident that was reported to  
 20 her.  
 21 A. I don't recall anything like that.  
 22 Q. Gracie Reyna or anybody else, nobody else ever  
 23 reported that to you or anyone else, as far as you know?  
 24 A. There was a PREA incident in O&A that  
 25 Ms. Roters handled, okay. And she reported it

1 immediately and handled it, again, appropriately.  
2 However, there was an objection on the part of one of  
3 the O&A staff about how she handled it.

4 Q. Who was that?

5 A. Ms. Carnell.

6 Q. What was the objection?

7 A. The young lady that had been touched had filed  
8 a grievance saying that Ms. Roters had not taken the  
9 incident serious enough. At the time my PREA  
10 coordinator at the facility and our statewide PREA  
11 coordinator were out of touch, I couldn't get with them,  
12 they were gone.

13 Because of the thoroughness in Ms. Roters'  
14 report about how she handled that incident, it was a  
15 very thorough report, I could find nothing missing. And  
16 so when KS filed a grievance, I called our legal  
17 person. Because normally if I file a grievance against  
18 you, you're not going to handle the grievance normally.  
19 But I thought because of, again, the thoroughness of the  
20 report and the steps that Ms. Roters took for that young  
21 girl, I wanted Laura to go back and talk to her to see  
22 what it was that Laura might have missed.

23 According to Ms. Carnell, my asking Laura  
24 Roters to go and meet with KS again re-traumatized  
25 her. Ms. Carnell was very angry. By that I mean she

1 came in my office raising her voice, telling me that she  
2 knew it was a PREA incident and I handled it wrong by  
3 sending Laura back down there.

4 Q. Did you have any basis on which you knew that  
5 Ms. Roters' report was accurate as opposed to just  
6 thorough?

7 A. What I can recall is that Ms. Roters happened  
8 to walk into the gym. The kids were in the gym for PE.  
9 Ms. Roters was approached by Ms. Carnell and Ms. Carnell  
10 asked Ms. Roters to talk to this particular young lady  
11 because she had reported that she had been touched.

12 Laura's report was that she took the young  
13 lady out in the hall to talk to her, the young lady told  
14 her she had reported the incident to the teacher and a  
15 couple other people, a couple other staff in O&A.  
16 Ms. Roters offered to take her outside for PE, to go  
17 somewhere else in the building to do PE, and the young  
18 lady said, No, I want to go back in the gym. Well, in  
19 the gym was the young man that touched her. Ms. Roters  
20 immediately had his room changed so that that young man  
21 would not go to school with the young lady, would not  
22 eat at the same table. And that's what you do, you  
23 remove, separate the victim and the perpetrator.

24 Q. Do you have any reason to doubt Ms. Carnell's  
25 statement to you that KS was traumatized by Ms. Roters

1 approach to her?

2 A. After Ms. Carnell came to my office very  
3 upset, I went and got the young lady. I had the  
4 grievance in my hand, I went and took her out of school,  
5 took her into her living area and sat down and talked to  
6 her. She told me that she appreciated the opportunity  
7 to talk to Ms. Roters a second time because she thought  
8 it was important that Ms. Roters understood, she didn't  
9 think she took it serious enough.

10 The young lady continued to talk about some  
11 past abuse. I asked the young lady if she felt safe.  
12 She said she did. I asked her if she felt like we did  
13 everything we could to keep her safe. She said she did.

14 I knew a little bit about her. What I knew  
15 was that she was from the area, she had an infant son  
16 who was blind. And so it wasn't a quick conversation  
17 with the young girl; I spent some time with her to  
18 ensure that she was in a good place and she was doing  
19 okay. And I believe I wrote all of that up and attached  
20 it to the grievance.

21 Q. Are you aware of an incident in which employee  
22 Sabrina McNally, later Sabrina Payne I think her name  
23 became, was assaulted by a juvenile?

24 A. I don't think "assault" is the right word.

25 Q. What is the right word?

1 A. There was a young man that was out of control,  
2 he was restrained. And I don't know if you've ever seen  
3 that, but there can be a lot of legs flying and arms,  
4 that kind of thing. And I believe Sabrina attempted to  
5 assist in the restraint and ended up getting kicked, I  
6 believe, in the side of her head.

7 Q. So as far as you know, it was an accidental  
8 sort of kick rather than --

9 A. An assault is I'm going after you with an  
10 intent to hurt you. And that was not the case.

11 Q. Maybe not an accidental kick exactly, but in  
12 his flailing perhaps was attempting to hurt staff, as  
13 far as you know?

14 A. He was just out of control.

15 Q. Who was the juvenile?

16 A. I don't remember his name. He was either -- I  
17 don't remember. I can see him, but I just don't  
18 remember the name.

19 Q. So you are saying it wasn't a targeted  
20 deliberate assault on Ms. Payne?

21 A. No.

22 Q. Is it fair to say she suffered some  
23 long-lasting effects from that kick?

24 **MR. COLLAER: If you know. I don't want you**  
25 **to speculate about her condition.**

1 THE WITNESS: I don't know about her medical  
2 diagnosis or anything like that. I know that she  
3 suffered a head injury, I know that she was off work for  
4 quite some time. When she came back I believe it was on  
5 a part-time basis for a little while.

6 Q. (BY MR. SCHOPPE) Are you aware of whether  
7 there was an incident report prepared for that incident?

8 A. I'm sure there was an incident report done for  
9 the restraint on the juvenile. But as far as  
10 Ms. Payne's injury, if that's what you're asking, those  
11 are not incident reports. When an employee gets hurt,  
12 assaulted, whatever, there is an employee accident form,  
13 and that's completed by the employee and their  
14 supervisor. I see those as the superintendent, and they  
15 are sent to an HR officer in St. Anthony, Idaho, Lisa  
16 Fausett, where Lisa keeps all of those records in case  
17 there is workmen comp claims.

18 Q. In the course of recording an incident report  
19 involving a violent assault by a juvenile or a violent  
20 acting out, whatever you'd call that, are injuries to  
21 staff typically noted?

22 A. It might be noted, but it's not going to go  
23 into depth, because the incident report is regarding the  
24 juvenile and what the juvenile did. The incident report  
25 would include any witnesses or it would be just the

1 like that for that?

2 A. No.

3 Q. Have you ever told anyone that Laura Roters  
4 was sent to clean house in O&A?

5 A. I don't recall saying anything like that,  
6 okay. That's not what I sent Laura Roters down there to  
7 do. I don't recall saying that.

8 Q. Was it your decision to move Laura Roters into  
9 that position?

10 A. It was a decision based on advice that I  
11 received from the Director, from legal, from HR, and  
12 from Frank Riley.

13 Q. Was there anyone else that was considered for  
14 that position?

15 A. No, sir.

16 Q. Was that position posted as available for  
17 transfer or anything like that?

18 A. You keep saying "position" and I'm getting  
19 confused. Laura Roters was a unit manager in Choices  
20 and Solutions. Tom Knoff had been terminated.  
21 Therefore, there was no one down there in a supervisory  
22 role. It was a collective decision that Laura Roters  
23 would be the most appropriate person to send to O&A to  
24 support and help the staff. That did not leave Choices  
25 and Solutions uncovered, because Choices and Solutions

1 facts about the incident regarding the juvenile.

2 Q. Do you know if you reviewed that particular  
3 incident report?

4 A. I don't recall.

5 Q. As a matter of course did you review all  
6 incident reports?

7 A. Yes, sir. In fact, they were not -- there  
8 were several processes. An IR was written by an  
9 employee, it was reviewed by the employee's supervisor,  
10 following that it was reviewed by a unit manager, if  
11 there was one, then it would come to me as the  
12 superintendent. I would read it and sign off on it and  
13 it was a done deal.

14 Q. I forget how you put it exactly earlier when  
15 you said you had moved Laura Roters into the spot left  
16 by Tom Knoff; is that how you put it or how you would  
17 put it?

18 A. Well, I wouldn't call it Tom Knoff's spot. I  
19 needed someone down there in O&A that was going to be  
20 able to help and support the staff. And she was, and I  
21 still believe, the best candidate to go down there to do  
22 that.

23 Q. Was that a promotion?

24 A. No.

25 Q. Did she receive an increase in pay or anything

1 already had supervisors. Follow me?

2 Q. I'm trying to.

3 A. You are?

4 Q. I am.

5 A. In other words --

6 Q. I'm only a lawyer though.

7 A. -- there was no supervision once Tom was  
8 terminated in O&A. Somebody needed to go down there in  
9 a supervisory role. I moved Laura. I did not, by  
10 moving Laura, I did not leave Choices and Solutions  
11 without supervision because they already had it.

12 Q. Did her title change?

13 A. No.

14 Q. She is still a unit manager but in a different  
15 place?

16 A. Right.

17 Q. There was no unit manager that replaced her  
18 where she had been?

19 A. Let me think. I don't remember. You know, a  
20 year of being gone. I just, I don't recall if we  
21 reclassified for that other unit manager position. I just  
22 don't recall.

23 Q. The one she left or the one she went to?

24 A. No, the one that had been -- I don't know.  
25 I'm sorry, I just...

1 Q. You don't have to apologize for anything.  
 2 Had you ever made that sort of a transfer or  
 3 organizational restructuring before?  
 4 A. You mean like move somebody from one area to  
 5 another?  
 6 Q. Along those lines, like moving a unit manager  
 7 from one area to another?  
 8 A. I don't recall doing it before. But I mean,  
 9 it's always been an option for supervisors.  
 10 Q. Among the group that selected Ms. Roters for  
 11 the position, who was the group?  
 12 MR. COLLAER: **Objection; misstates her**  
 13 **testimony. She has told you she wasn't selected for**  
 14 **anything; she was already a unit manager.**  
 15 THE WITNESS: **To move her?**  
 16 Q. (BY MR. SCHOPPE) To move her, yes.  
 17 A. I thought I already answered that. I met with  
 18 the Director, Frank Riley, Nancy Bishop, Julie Cloud  
 19 following Tom's termination and it was a collective  
 20 decision that the best candidate to move to O&A to help  
 21 O&A was Laura Roters.  
 22 Q. Was there any consideration given to any other  
 23 candidates, any other employees?  
 24 A. I can't recall.  
 25 Q. Was there any discussion as to whether the

1 spot, whether it's a position or not, should be made  
 2 available to applicants?  
 3 A. There had not been any discussion about that.  
 4 Q. Do you know if there is any policy or anything  
 5 that would have required that to have been the case?  
 6 MR. COLLAER: **Objection; calls for a legal**  
 7 **conclusion. Go ahead if you know.**  
 8 THE WITNESS: **I don't know.**  
 9 Q. (BY MR. SCHOPPE) You were responsible for the  
 10 policy within the Department though; right?  
 11 MR. COLLAER: **Are you talking about internal**  
 12 **policies?**  
 13 MR. SCHOPPE: **For making sure that policies**  
 14 **are followed.**  
 15 MR. COLLAER: **Again, you're talking about**  
 16 **internal policies.**  
 17 MR. SCHOPPE: **It can be anything from law to**  
 18 **internal policies.**  
 19 THE WITNESS: **Internal policies can be changed**  
 20 **by the Director.**  
 21 Q. (BY MR. SCHOPPE) How can that happen; is  
 22 there a process by which that occurs?  
 23 A. She gives out a directive.  
 24 Q. Was that the case in this instance where  
 25 Ms. Roters was moved?

1 A. I think I've already answered that question.  
 2 It was a collective decision.  
 3 Q. I understand. You did say that, but what I'm  
 4 asking is: Was there a directive of the kind that you  
 5 just mentioned that was made in connection with  
 6 Ms. Roters' movement into that position, into that new  
 7 area?  
 8 A. Did it violate some policy?  
 9 Q. No.  
 10 MR. COLLAER: **Can you read his question back.**  
 11 **That's what you need to answer.**  
 12 **(Record read back.)**  
 13 THE WITNESS: **A directive?**  
 14 MR. COLLAER: **Can you define "directive."**  
 15 Q. (BY MR. SCHOPPE) I think actually it's a word  
 16 you had used, the director can change policy.  
 17 A. And send out a directive.  
 18 Q. Okay.  
 19 A. But the move of Ms. Roters from Choices and  
 20 Solutions to O&A, there was no directive given.  
 21 Q. In what instances can the Director change  
 22 policy by directive?  
 23 A. That would depend.  
 24 Q. On what? Earlier you had testified about a  
 25 process by which policies are promulgated and

1 distributed and comments are invited and things like  
 2 that.  
 3 A. You're talking about internal policy.  
 4 Q. I understand that.  
 5 You described that process earlier. So I'm  
 6 asking you instances in which the Director can change  
 7 policy with a directive, are you talking about those  
 8 kind of policies?  
 9 A. Internal policies, yes.  
 10 Q. Is there a process by which that works or is  
 11 it simply the Director's discretion to do so, as far as  
 12 you know?  
 13 A. It's the Director's decision.  
 14 Q. Is there any kind of criteria or standard by  
 15 which those decisions are made, as far as you know?  
 16 A. Not so far as I know.  
 17 Q. In the time that you were the superintendent  
 18 of the facility, are you aware of other instances in  
 19 which policies were changed by directive of the  
 20 Director?  
 21 A. I don't recall. I can't.  
 22 Q. Do you think there might have been or do you  
 23 think there were none?  
 24 MR. COLLAER: **Objection; it's been asked and**  
 25 **answered. If you remember, you can --**



1           **THE WITNESS: I don't remember.**  
 2           **Q.** (BY MR. SCHOPPE) Does that authority extend  
 3 to application of state or federal law within the  
 4 facility?  
 5           **MR. COLLAER: Objection; calls for a legal**  
 6 **conclusion. If you understand the question you can go**  
 7 **ahead and answer.**  
 8           **THE WITNESS: We don't have the authority to**  
 9 **change state or federal law.**  
 10          **Q.** (BY MR. SCHOPPE) Were there any directives  
 11 ever issued, that you're aware of, that affected how the  
 12 Department actually complied with state or federal law?  
 13          **MR. COLLAER: Object to the form of the**  
 14 **question; it's vague. If you can understand that, go**  
 15 **ahead.**  
 16          **THE WITNESS: I don't.**  
 17          **Q.** (BY MR. SCHOPPE) Are you aware of any  
 18 instances in which the Department should have done  
 19 something in the context of PREA reporting that it  
 20 didn't because of a directive from the Director?  
 21          **A.** I'm not aware of that.  
 22          **Q.** Was there any kind of a six-month mandatory  
 23 cross-training program for staff security officers in  
 24 place at the beginning of 2012?  
 25          **A.** Repeat that question.

1 you?  
 2          **A.** She told me she was moving him to nights.  
 3          **Q.** Did she tell you why?  
 4          **A.** I don't recall.  
 5          **Q.** Did she tell you whether it was for  
 6 disciplinary reasons?  
 7          **A.** No.  
 8          **Q.** Did you discuss a cross-training program of  
 9 any kind with her?  
 10          **A.** I want to say I recall something being said  
 11 about other exposure, but I can't be certain.  
 12          **Q.** I didn't catch that. Other exposure, is that  
 13 what you meant?  
 14          **A.** Yes, like being exposed to a different shift  
 15 and that kind of thing.  
 16          **Q.** Was this something that was to be applied to  
 17 all staff security officers, as far as you knew?  
 18          **A.** Again, about the only answer I can give you is  
 19 that it was the supervisor's responsibility to provide  
 20 the coverage with their staff. It was the supervisor's  
 21 decision whether you're going to work the day shift, the  
 22 evening shift or the night shift.  
 23          **Q.** Are there any criteria by which those  
 24 assignments are made?  
 25          **A.** "Criteria"?

1           **MR. SCHOPPE: Can you reread that, please.**  
 2 **(Record read back.)**  
 3           **THE WITNESS: Cross-training would have been a**  
 4 **decision made by the appropriate supervisor.**  
 5          **Q.** (BY MR. SCHOPPE) Specifically in the context  
 6 of staff security officers, and specifically Shane  
 7 Penrod, in January of 2012 do you remember Shane Penrod  
 8 being reassigned to what they call the graveyard shift?  
 9          **A.** Yes, sir.  
 10          **Q.** What is the graveyard shift?  
 11          **A.** 10:00 to 6:00 or -- there's a couple of  
 12 different. There's a 10:00 to 6:00, there's a 12:00 to  
 13 8:00. But it's nights while the kids are sleeping.  
 14          **Q.** You do recall that Mr. Penrod was reassigned  
 15 to that shift at that point in time?  
 16          **A.** Yes, sir.  
 17          **Q.** Did you have any input into that reassignment?  
 18          **A.** Did I what?  
 19          **Q.** Have any input into that reassignment?  
 20          **A.** No, I didn't.  
 21          **Q.** Whose decision was that?  
 22          **A.** His supervisors.  
 23          **Q.** Who was that at the time?  
 24          **A.** Julie McCormick.  
 25          **Q.** Did she ever discuss that reassignment with

1          **Q.** Seniority, good behavior, anything like that?  
 2          **A.** Not that I'm aware of.  
 3          **Q.** Even to distinguish between policy and actual  
 4 practice, are decisions like that typically made on a  
 5 seniority basis?  
 6          **A.** I can't answer that. I don't know.  
 7          **Q.** You don't know. Did you --  
 8          **A.** Again, it was the supervisor's responsibility  
 9 to cover the shifts with adequate staff.  
 10          **Q.** Who did the supervisor report to?  
 11          **A.** Well, in Julie McCormick's case she answered  
 12 to me.  
 13          **Q.** Were there any rules of any kind or was it  
 14 just whatever the supervisor wanted?  
 15          **A.** There weren't any rules. It was not what  
 16 the -- it was the responsibility of the supervisor to  
 17 assign the staff.  
 18          **Q.** Did Mr. Penrod come to you with concerns or  
 19 complaints about his reassignment?  
 20          **A.** I don't recall Shane coming to me. What I do  
 21 recall is that Shane went to human resources, I believe.  
 22 But I honestly don't recall him coming to me.  
 23          **Q.** Do you understand what he went to human  
 24 resources for?  
 25          **A.** I understood it was a problem solving.



1 Q. Okay.  
 2 A. That's all I know.  
 3 Q. In the problem-solving process, would that be  
 4 typical for a staff security officer with a problem with  
 5 a supervising staff security officer to not go directly  
 6 to you but rather to human resources?  
 7 A. They would quite often go to human resources  
 8 when they wanted to do a problem solving.  
 9 Q. Was there a reason they didn't go to you with  
 10 that?  
 11 A. Well, I'm not trained in the problem solving.  
 12 I know of it, but our HR people are trained, they know  
 13 how to facilitate that.  
 14 Q. So you don't have a real role there unless you  
 15 are part of the problem to be solved?  
 16 A. Right.  
 17 Q. Okay.  
 18 A. I hate to ask.  
 19 Q. Do you need a break?  
 20 A. Absolutely.  
 21 (Recess taken from 3:50 to 4:11 p.m.)  
 22 Q. (BY MR. SCHOPPE) Looking back at the time  
 23 card fraud, did anyone ever report to you that either of  
 24 the Rohrbachs were not working all the time that they  
 25 claimed?

1 A. I had heard that.  
 2 Q. Who did you hear that from?  
 3 A. Rumor. I can't recall.  
 4 Q. Did you look into that?  
 5 A. Well, first of all, I didn't need to look into  
 6 Mrs. Rohrbach's time, because Mrs. Rohrbach reported to  
 7 the Director, Sharon. I was Dave's supervisor and I  
 8 signed Dave's time sheets. Dave and his wife had  
 9 disabilities, both of them did, and all that I did was  
 10 work to accommodate that disability, okay.  
 11 So did Dave work every day eight full hours?  
 12 Some days, no, sir. But when he didn't, he always coded  
 13 it to his accrued leave.  
 14 Q. Was that an accommodation reached with the  
 15 involvement of human resources at all or was that just  
 16 your discretion?  
 17 A. I can't remember if human resources was  
 18 involved. I know there was discussion that I had with  
 19 the Director. Both Sharon and I valued the Rohrbachs'  
 20 expertise. Between the two of them I think they have  
 21 something like 50-some-odd years experience working with  
 22 juveniles. And quite honestly, I wanted to keep Dave at  
 23 Nampa as long as I could.  
 24 Q. Why did he leave?  
 25 A. Health. He just -- the first health issue

1 following hernia surgery, he was throwing blood clots.  
 2 I was actually with him at the hospital. He actually  
 3 died on the table. They were able to bring him back. I  
 4 think it was a year or two later he started having  
 5 problems with his leg. He went to specialists, they  
 6 found a tumor that was wrapped around his spine. He  
 7 underwent surgery to remove the tumor. The surgery  
 8 caused some damage to his bladder. And following that  
 9 his doctor -- Dave just couldn't get around and his  
 10 doctor prescribed a scooter.  
 11 Q. Going back to your time card fraud issues,  
 12 anybody ever tell you or did you ever hear that Debbie  
 13 Siegel was not working for all the time she had claimed  
 14 or was being paid for?  
 15 A. I don't recall that. But again, Debbie Siegel  
 16 worked out of my facility for a while. But I didn't  
 17 supervise Debbie, I didn't know what arrangements she  
 18 had with her supervisor. I know Debbie was out a lot  
 19 when her husband was dying of cancer. That's all I  
 20 know.  
 21 Q. How about Debbie Day?  
 22 A. Who.  
 23 Q. Debbie Day?  
 24 A. Deborah Day?  
 25 Q. Sure, yes.

1 A. Deborah Day worked at headquarters, so I don't  
 2 know anything about Deborah Day.  
 3 Q. How about Lamark Judkins?  
 4 A. Lamark Judkins, when he was promoted to PbS  
 5 training coordinator I supervised Lamark. Any time  
 6 Lamark wanted time off, if I could approve it I would,  
 7 he would charge it to his accrued leave. If Lamark was  
 8 going to be out sick or in late or whatever, he always  
 9 notified me.  
 10 Q. How about Maria Ferrara?  
 11 A. Well, again, I didn't supervise her, so I  
 12 don't know.  
 13 Q. Who did supervise her?  
 14 A. Estela Cabrera.  
 15 Q. Speaking of Estela, are you aware of or did  
 16 you ever hear or witness any statements concerning  
 17 Jo McKinney's age being made by anybody in the office  
 18 that Jo McKinney works in?  
 19 A. You know, sir, after this lawsuit came out and  
 20 I heard that, I never, I never heard the word  
 21 "retirement" and "Jo McKinney" associated together.  
 22 Q. How about "old lady" or anything like that?  
 23 A. Did I ever hear that? I didn't hear that, but  
 24 I'm going to be honest and tell you that I gave her a  
 25 birthday card one time that was one of those funny cards

1 about an old lady or something. But I just thought it  
 2 was -- anyway.  
 3 Q. Were you aware of any hostility between Jo and  
 4 Ms. Ferrara or Estela Cabrera or anyone else at the  
 5 office?  
 6 A. What I remember, what I recall, Jo McKinney  
 7 went through a problem solving with Estela several years  
 8 ago, and that was several years ago because the HR  
 9 officer that helped them with that was Crystal Morales,  
 10 and Crystal hasn't been with our department for many  
 11 years.  
 12 And following that problem solving as Estela's  
 13 supervisor, I would check in with HR, I would check in  
 14 with Estela. And as far as I was being told, whatever  
 15 the issue was that Jo had with Estela had been resolved,  
 16 it had gotten better.  
 17 Now, it's common knowledge that there is a lot  
 18 of distention amongst a lot of the office specialists.  
 19 I know Estela tried to do everything she could to help  
 20 them get along, if you will, but there were plenty of  
 21 incidents where Maria Ferrara, Jo McKinney -- what was  
 22 the other lady's name?  
 23 Q. Is there a Bobbi -  
 24 A. She supported District 3. I could see her  
 25 face, but I can't think of her name. Anyway, they would

1 woog from time to time.  
 2 Q. Is that a Tennessee thing?  
 3 A. Yeah. Not get along.  
 4 Q. Could that have been Bobbi Rogers that you're  
 5 thinking of or someone else?  
 6 A. No.  
 7 Q. It's okay. Certainly don't hit yourself.  
 8 A. It just won't come to me.  
 9 Q. Is there any policy concerning personal  
 10 businesses or business matters in the workplace, for  
 11 example, Jo McKinney does tattoos, I understand,  
 12 outside?  
 13 A. There is a bulletin board, a specific bulletin  
 14 board, where staff can post if they're selling their  
 15 teepee or they're doing whatever. But as far as like  
 16 going door to door during business hours, no, it has to  
 17 be on a break. I might go out in the parking lot and  
 18 show you the birdhouses that I'm working on.  
 19 Q. Did you ever make a statement to anyone in the  
 20 presence of Jo McKinney or near her to the effect that  
 21 Shane Penrod would never work day shift again?  
 22 A. I don't recall saying that around anybody.  
 23 Q. Did you ever discuss Shane Penrod's  
 24 reassignment with Mark Freckleton after he became the  
 25 supervising staff security officer?

1 A. Only to the extent that Shane was upset, he  
 2 had filed a problem solving, that kind of thing. I just  
 3 shared with Mark what little bit I could. Because  
 4 Ms. McCormick was terminated and I think for two weeks I  
 5 acted as the safety and security supervisor before Mark  
 6 came to me and asked to let him take the job back on.  
 7 Q. I may have gotten the statement wrong earlier.  
 8 Did you ever make a statement in front of Jo McKinney to  
 9 the effect that Shane Penrod would work graveyard shift  
 10 or he would have to find another job?  
 11 A. Again, sir, I don't recall making that kind of  
 12 comment around Jo McKinney. And I don't know why Jo  
 13 McKinney and I would be talking about Shane Penrod.  
 14 Q. It wasn't necessarily in a conversation with  
 15 her, but near her. Did you say that to anyone at all or  
 16 anything like that?  
 17 A. Not that I recall.  
 18 Q. In discussing Shane's shift assignment on the  
 19 graveyard shift, did Mr. Freckleton discuss with you the  
 20 prospect of resigning Shane to another shift, the day  
 21 shift?  
 22 A. No, he didn't.  
 23 Q. He wasn't seeking permission to do that or  
 24 anything?  
 25 A. He didn't have to; he was the supervisor.

1 Q. It was his call?  
 2 A. Yes.  
 3 Q. Just as it had been Julie McCormick's call?  
 4 A. Yes.  
 5 Q. Did you tell him that?  
 6 A. Who?  
 7 Q. Freckleton.  
 8 A. Probably. I think a better answer would be I  
 9 met with Mark as one of my supervisors, a person I was  
 10 going to be supervising, and I let him know what my  
 11 expectations were of him.  
 12 Q. Speaking of expectations, is there any kind of  
 13 policy or practice by which particular employees may  
 14 have expectations that are unique to them written out  
 15 for them?  
 16 MR. COLLAER: Object to the form of the  
 17 question; it's vague. If you know what he's talking  
 18 about.  
 19 THE WITNESS: I don't know what you're talking  
 20 about.  
 21 Q. (BY MR. SCHOPPE) For any given employee, can  
 22 a supervisor issue a set of written expectations for  
 23 that particular employee?  
 24 MR. COLLAER: Same objection, it's vague and  
 25 calls for speculation. If you know what he's talking

1 about, go ahead.  
 2 **THE WITNESS: If that's what the supervisor**  
 3 **felt was necessary and appropriate, then by all means.**  
 4 **Q. (BY MR. SCHOPPE)** Are you aware of whether  
 5 Summer Wade, who preceded Julie McCormick as a  
 6 supervising staff security officer, she issued  
 7 particularized expectations for Rhonda Ledford?  
 8 **A.** I don't remember special expectations. I just  
 9 remember there seemed to be a lot of discord between  
 10 Ms. Wade and Ms. Ledford.  
 11 **Q.** Do you know why that was?  
 12 **A.** The report I was getting from my staff, Summer  
 13 Wade, is that she was attempting to address issues with  
 14 Ms. Ledford regarding performance, overtime. I forget  
 15 what else. But there were issues.  
 16 **Q.** Are you aware of whether Ms. Wade did, in  
 17 fact, issue specific expectations that were unique to  
 18 Ms. Ledford?  
 19 **A.** I don't know.  
 20 **Q.** Do you know if human resources ever gets  
 21 involved in that process?  
 22 **A.** Human resource may or may not. It depends  
 23 upon if the supervisor seeks their assistance. I know  
 24 over the years when I would work on a developmental plan  
 25 for an employee or something, I would go to HR for

1 **objections. An objection is fine.**  
 2 **Q. (BY MR. SCHOPPE)** But actually, my question is  
 3 about are you aware of whether human resources  
 4 instructed him to do that?  
 5 **MR. COLLAER: Same objection.**  
 6 **Q. (BY MR. SCHOPPE)** Not whether he did it or  
 7 not.  
 8 **A.** I'm not aware.  
 9 **Q.** You didn't instruct him to do that?  
 10 **A.** Who?  
 11 **Q.** You didn't instruct him to do that?  
 12 **A.** To do what?  
 13 **Q.** To create special expectations for Rhonda  
 14 Ledford?  
 15 **A.** All I did was make him aware of the special  
 16 expectations that Julie McCormick had drawn up.  
 17 **Q.** How did that conversation go? If it was a  
 18 conversation. Was it an e-mail or something?  
 19 **A.** I don't remember. Again, he was taking over  
 20 as the new safety and security supervisor, and I did my  
 21 best to share with Mark what I knew. At the time that  
 22 Julie was terminated, I know I testified earlier, there  
 23 were a number of employee appraisals that were overdue.  
 24 And I attempted to help Mark in completing some of  
 25 those. because there were quite a few.

1 assistance to review it and to help guide me.  
 2 **Q.** Are you aware of whether Julie McCormick  
 3 issued the same set of unique expectations for  
 4 Ms. Ledford?  
 5 **A.** I don't know if they were the same set  
 6 because, like I've already said, I didn't see any  
 7 expectations that were drawn up by Ms. Wade. I did  
 8 receive a copy of the expectations that were drawn up  
 9 for Rhonda Ledford by Julie McCormick with the  
 10 assistance of HR, I believe.  
 11 **Q.** Do you know who in HR?  
 12 **A.** I'm not sure.  
 13 **Q.** How about with respect to Mark Freckleton, are  
 14 you aware of any expectations that he drew up for  
 15 Ms. Ledford?  
 16 **A.** I'm not aware.  
 17 **Q.** Do you know whether he was instructed to do  
 18 that by anyone in human resources?  
 19 **MR. COLLAER: Object to the form of the**  
 20 **question; she said she doesn't even know if the**  
 21 **expectations, if they exist or not.**  
 22 **THE WITNESS: I'm not aware.**  
 23 **Q. (BY MR. SCHOPPE)** Well, you're talking about  
 24 expectations.  
 25 **MR. SCHOPPE: And please refrain from speaking**

1 **Q.** What did you tell Mark about Rhonda Ledford?  
 2 **A.** Well, I don't know -- other than the issues  
 3 and problems that Julie had had, I don't recall having  
 4 any full-blown conversation with Mark Freckleton about  
 5 Rhonda Ledford. Mark Freckleton had been the safety and  
 6 security supervisor, he was the first one at our  
 7 facility, and I believe he had supervised Rhonda many  
 8 years ago before I became superintendent. So you know,  
 9 he knew Rhonda. By the time Mark became the safety and  
 10 security supervisor, the whistle-blower lawsuit had  
 11 already come out.  
 12 **Q.** Prior to the whistle-blower lawsuit being  
 13 filed, let's go back to 2010, was there any monitoring  
 14 of Rhonda Ledford taking place that you would regard as  
 15 unusual with respect to other staff security officers?  
 16 **MR. COLLAER: Objection; vague.**  
 17 **THE WITNESS: In 2010?**  
 18 **MR. COLLAER: Could you identify or describe**  
 19 **what you mean by "monitoring."**  
 20 **Q. (BY MR. SCHOPPE)** Watching her, monitoring her  
 21 activities, making any reports concerning what she was  
 22 doing, who she was talking to.  
 23 **A.** In 2010?  
 24 **Q.** From 2010 all the way up to filing of the  
 25 whistle-blower lawsuit.

1 A. Not prior to, that I'm aware of, that I can  
 2 recall. But after the lawsuit came out, it was  
 3 requested of me to not just watch Rhonda, but keep my  
 4 eyes and ears open for fear of possible retaliation.  
 5 And I did not want that happening.  
 6 Q. Who asked you to do that?  
 7 A. Legal, HR, the Director.  
 8 Q. What do you mean about retaliation,  
 9 retaliation against who?  
 10 A. That somebody would say or do something to one  
 11 of the Plaintiffs that was not appropriate, was not  
 12 right.  
 13 Q. All right.  
 14 A. And I was also asked to let HR and legal know  
 15 if I did hear anything or have any issues or concerns.  
 16 Q. Were the Plaintiffs monitored after they filed  
 17 the lawsuit in terms of who they were speaking to?  
 18 A. I don't know what you mean by "monitored." I  
 19 don't know.  
 20 Q. Did you ever report to anyone in human  
 21 resources or to the Director that Ms. Ledford was  
 22 speaking with other employees like Addison Fordham, for  
 23 example?  
 24 A. I believe I testified earlier that I had a lot  
 25 of angry and upset staff. And I don't think a day

1 didn't go by that I didn't get a report about what  
 2 Ms. Ledford was doing or what Ms. Reyna was doing or,  
 3 you know. And again, I just forwarded that information  
 4 on, as I was asked to do.  
 5 Q. When was that, what time frame are you talking  
 6 about; after the lawsuit was filed?  
 7 A. Yeah. Way after.  
 8 Q. How about before that?  
 9 A. Not that I'm aware of.  
 10 Q. How about with respect to e-mail, are  
 11 employees' e-mails monitored at the Department?  
 12 A. Monitored?  
 13 Q. Yes. Was anybody looking at it?  
 14 A. It's my understanding that you are using a  
 15 State computer and it's State property, and so if there  
 16 was cause, I'm sure that they could look.  
 17 Q. What cause would there be?  
 18 A. Something inappropriate. I know that -- yeah,  
 19 that's the best example I can give you, something  
 20 inappropriate.  
 21 Q. How about in the context of the filing of this  
 22 lawsuit, is that something that would warrant monitoring  
 23 the Plaintiffs' e-mails?  
 24 **MR. COLLAER: You mean use the State computer**  
 25 **system?**

1 **MR. SCHOPPE: Yes.**  
 2 Q. (BY MR. SCHOPPE) In other words, did anybody  
 3 start watching what the Plaintiffs were doing on e-mail  
 4 after the lawsuit was filed, as far as you know?  
 5 A. Not that I'm aware.  
 6 Q. Any records start being kept about the  
 7 Plaintiffs, any of them, as far as you know?  
 8 A. Records kept?  
 9 Q. Right. Records that had not been kept before  
 10 about who they were speaking with or things they might  
 11 be saying or things like that?  
 12 A. Not that I know of.  
 13 Q. Were they monitored on video or anything like  
 14 that by anyone?  
 15 A. When I would get my reports from staff, there  
 16 was one or two occasions that I watched because I was  
 17 being told that there was a steady stream of Plaintiffs  
 18 going into Ms. Ledford's office. At the time,  
 19 Ms. Ledford had been assigned a new task and it wasn't  
 20 going as well as I had hoped it would. And her  
 21 supervisor and I discussed the possibility that maybe  
 22 the interruptions were possibly responsible for some of  
 23 the problems.  
 24 Q. Did you know what the interruptions were  
 25 about?

1 A. Who?  
 2 Q. Did you know what the interruptions were  
 3 about, what they were talking about?  
 4 A. No.  
 5 Q. Do you have any reason to believe they weren't  
 6 discussing ordinary work facility-oriented issues?  
 7 A. I wouldn't know.  
 8 Q. Did you ever tell anyone that Rhonda had  
 9 problems and was not held in high regard at the  
 10 facility?  
 11 A. Did I tell anyone Rhonda had problems?  
 12 Q. And was not held in high regard at the  
 13 facility.  
 14 A. I don't recall saying that.  
 15 Q. Was Lisa Littlefield another of the O&A staff  
 16 that you considered to be challenging or belligerent  
 17 with Laura Roters?  
 18 A. I don't recall hearing that.  
 19 Q. Did Ms. Littlefield ever suggest to you her  
 20 shifts were being changed in retaliation for complaints  
 21 about Ms. Roters?  
 22 A. I don't recall that.  
 23 Q. Did Ms. Littlefield ever raise concerns with  
 24 you about Ms. Roters' qualifications to be in her  
 25 position?



1 A. I don't recall that.  
 2 Q. Have you ever expressed any kind of preference  
 3 against hiring veterans for positions at the Department?  
 4 A. No, sir.  
 5 Q. Has Director Harrigfeld?  
 6 A. No, sir.  
 7 Q. Did you ever hear Julie McCormick indicate  
 8 that candidate lists for positions at the Department  
 9 were top-heavy with veterans or correctional officers?  
 10 A. I don't recall that.  
 11 Q. You don't recall her indicating that there was  
 12 a preference against hiring veterans at the facility?  
 13 A. No, sir.  
 14 Q. Is that to say that it didn't happen or you  
 15 don't recall?  
 16 **MR. COLLAER: Again, you're asking if she**  
 17 **knows if Julie McCormick made comments like that?**  
 18 **MR. SCHOPPE: Yes.**  
 19 **THE WITNESS: I don't recall Ms. McCormick**  
 20 **making that comment.**  
 21 Q. (BY MR. SCHOPPE) Or anybody else?  
 22 A. Not that I'm aware of.  
 23 Q. Are you aware of any particular  
 24 disciplinary issues with respect to Tom de Knijf?  
 25 A. Yes, sir. I know I had to handle a couple of

1 A. I believe it's the whistle-blower, what I  
 2 recall.  
 3 Q. I'll represent to you that wasn't filed until  
 4 June of 2012, a year after this e-mail.  
 5 A. Well, then I better retract what I said,  
 6 because I really can't remember what this was about.  
 7 Q. Was there a reason you were watching or  
 8 gathering information about who Rhonda Ledford was  
 9 speaking with at that time?  
 10 A. I don't recall. I tried.  
 11 Q. Was there a reason you were sending this  
 12 information to Julie Cloud?  
 13 A. I don't recall.  
 14 Q. Do you recall how you gathered that  
 15 information?  
 16 A. No, sir, I don't.  
 17 Q. Do you know what she was speaking about with  
 18 Gracie Reyna, Addison Fordham or with Tom Knoff?  
 19 A. I do not.  
 20 Q. Do you know what she spoke about with O'Neal  
 21 Rich?  
 22 A. The only thing I know that she spoke to O'Neal  
 23 Rich about was a report that he made to me that he had  
 24 gotten a call from Ms. Ledford, the supervisor was  
 25 looking at moving some of the staff to the night shift

1 issues while his supervisor was out on FML. One of them  
 2 was regarding inappropriate comments in front of  
 3 juveniles to a teacher. Another time it was about his  
 4 failing to follow the schedule that had been set up for  
 5 him to pick up appropriate juveniles to help him with  
 6 some custodial services within the facility.  
 7 Q. Do you know who created that schedule?  
 8 A. That was developed between education and  
 9 Mr. de Knijf, and I can't remember who else. But I know  
 10 those two people were involved in it.  
 11 Q. Okay.  
 12 A. It may have been Richard Duke, who was the  
 13 principal, the school principal at the time.  
 14 **MR. SCHOPPE: I have a document to share with**  
 15 **you. Let's mark this document.**  
 16 **(Exhibit 137 marked.)**  
 17 Q. (BY MR. SCHOPPE) If you could let me know  
 18 what that document is.  
 19 A. Yes, sir, I recall what that's about. I had  
 20 received several complaints from various staff about  
 21 receiving phone calls to join in with the lawsuit and I  
 22 was simply reporting what I was asked to report.  
 23 Q. That was in June of 2011?  
 24 A. Yes.  
 25 Q. What lawsuit was that?

1 and Ms. Ledford had contacted Mr. Rich and told him that  
 2 she had heard that she was going to be moved and that if  
 3 they tried to do that, that she would file suit, a  
 4 lawsuit.  
 5 Q. Who had been told that?  
 6 A. O'Neal Rich.  
 7 Q. And he said Rhonda Ledford had said that?  
 8 A. Yes, that Rhonda had called him and said that.  
 9 Q. That if she would be transferred to night  
 10 shift she would file a lawsuit?  
 11 A. Yes.  
 12 Q. Did you have some reason to be concerned with  
 13 who Rhonda was speaking with at that time?  
 14 A. I can't answer that because I can't remember  
 15 what this is about. So I just can't.  
 16 Q. Did Julie Cloud ever say to you either in  
 17 writing or verbally that Rhonda Ledford keeps things  
 18 stirred up?  
 19 A. Did Julie Cloud say that?  
 20 Q. Yes.  
 21 A. Or write that? Not that I recall.  
 22 Q. Do you know if anybody else did?  
 23 A. I heard it. Now you're going to ask me from  
 24 who. I don't know. I don't remember, but I heard it.  
 25 Q. Do you recall if you heard it from anyone in

1 management versus more rank and file staff?  
 2 A. What I recall is rank and file staff.  
 3 Q. But nobody in particular?  
 4 A. Again, my answer's got to be that it was  
 5 constant.  
 6 Q. What was it that she was keeping stirred up?  
 7 A. I don't remember.  
 8 Q. Did anyone, including Julie Cloud, ever  
 9 suggest that Rhonda was gossiping with anyone?  
 10 A. I heard that.  
 11 Q. Who did you hear that from?  
 12 A. All I can say is I heard it.  
 13 Q. You don't know who it was from though?  
 14 A. No.  
 15 Q. Did you hear what she was gossiping about?  
 16 A. I can't recall.  
 17 Q. Did you know at the time?  
 18 A. No, because generally the superintendent was  
 19 the last to hear the gossip.  
 20 Q. Did you take that to be a negative thing?  
 21 A. What, that I was the last to hear?  
 22 Q. No, sorry. Reports of gossip.  
 23 A. Did I consider gossip negative?  
 24 Q. Or reports of gossip.  
 25 A. It wasn't appropriate at work.

1 Q. What was gossip, what did you consider gossip?  
 2 A. People having an affair or this going on or  
 3 that going on.  
 4 Q. Did you know if Rhonda was discussing those  
 5 things with people?  
 6 A. I don't recall.  
 7 Q. So you don't know one way or the other what  
 8 she was talking about with anyone?  
 9 A. No.  
 10 Q. Do you recall any reason for which Ms. Cloud  
 11 was concerned with watching Rhonda?  
 12 A. I know that Julie McCormick had gone to Julie  
 13 Cloud about Rhonda. I know that Julie Cloud, I believe  
 14 it was, looked into the time sheet business or the  
 15 overtime or something like that. I just can remember.  
 16 I'm sorry. I can't remember.  
 17 Q. Again, you don't have to apologize, just do  
 18 your best.  
 19 Why did you retire from the Department?  
 20 A. Why?  
 21 Q. Yes.  
 22 A. Well, a couple of reasons, to be honest. I  
 23 had been talking about retirement for several years, my  
 24 husband retired three years ago. I had planned to  
 25 retire in 2011, but because the Rohrbachs left as they

1 did, I didn't want to walk away from the facility quite  
 2 yet. The Director and I talked again about my  
 3 retirement. We built a home and it's in Grangeville,  
 4 it's not in Boise, and so I want to go.  
 5 Q. At the time the Rohrbachs left, was there any  
 6 investigation of any kind into their time card, time  
 7 reporting or anything like that?  
 8 A. You know, I can't say for sure, but it seems  
 9 to me I heard that somebody had looked into it, but I  
 10 can't remember who that was.  
 11 Q. Do you remember who you heard that from?  
 12 A. No, I can't remember. But I remember hearing  
 13 something about it. And there was no report that came  
 14 back to me.  
 15 Q. Did the lawsuit have any impact on your  
 16 decision to retire?  
 17 A. My decision?  
 18 Q. Yes.  
 19 A. No. In fact, I almost wrecked when Rolan  
 20 Barris [ph] called me on the telephone wanting to know  
 21 if I was being fired. But I would be less than honest  
 22 to tell you, if I didn't tell you that that lawsuit was  
 23 taking its toll on me as a superintendent. That lawsuit  
 24 was dividing my facility and my staff. It was stressful  
 25 day in and day out.

1 Q. Had anybody told you they thought your  
 2 facility was divided before the lawsuit?  
 3 A. I don't recall hearing that.  
 4 Q. What do you mean when you say "divided"?  
 5 A. There were people siding with the Plaintiffs  
 6 and there were people siding over here. It was just --  
 7 and one of my other concerns was that the focus seemed  
 8 to be on the lawsuit and I was worried that the focus  
 9 needed to be on the kids and the program. It just took  
 10 a toll on me.  
 11 Q. Who sided with the Plaintiffs, as far as you  
 12 know?  
 13 A. I don't know.  
 14 Q. Did you have a perception at the time of who  
 15 was on which side?  
 16 A. Not really.  
 17 Q. Did anybody tell you one way or the other?  
 18 A. No.  
 19 Q. I just want you to look at some things, we're  
 20 not going to mark them as exhibits. These are  
 21 Defendants' Answers, Objections and Responses to the  
 22 Plaintiffs' Request for Admissions, Set 1 to the  
 23 Defendants. The other document here is Defendants'  
 24 Answers to Plaintiffs' First Set of Interrogatories.  
 25 And the other set, just ignore the front matter and the

1 fax cover sheet, is Defendant' Responses to Plaintiffs'  
 2 Request For Production of Documents and Tangible Things,  
 3 Set I.  
 4 If you could just take a look at those. You  
 5 can go ahead and take a look at them and let me know if  
 6 you have ever seen these.  
 7 **MR. COLLAER: I think she testified earlier**  
 8 **that she hasn't. She had no involvement.**  
 9 **MR. SCHOPPE: She hasn't actually looked at**  
 10 **the documents.**  
 11 **THE WITNESS: (Reviewing documents.)**  
 12 **Q. (BY MR. SCHOPPE)** Generally speaking, those  
 13 were Defendants' responses to questions essentially  
 14 posed by the Plaintiffs in this lawsuit.  
 15 **A.** I can't recall seeing this one for sure.  
 16 **Q.** What is that one, the interrogatories?  
 17 **A.** I don't recall seeing that.  
 18 **Q.** That is the responses to the request for  
 19 production of documents and tangible things.  
 20 **A.** (Reviewing document.) No.  
 21 **Q.** That is "no" for the request for admissions?  
 22 Okay.  
 23 Did you do anything to try and find any  
 24 documents that might have been requested for the  
 25 Plaintiffs; did anybody ask you to do that?

1 **A.** No, sir.  
 2 **Q.** If you would take a look at this, it's a  
 3 request for admissions, and look at Nos. 22 and 23,  
 4 please -- no, I'm sorry, 23 and 24, please.  
 5 **MR. COLLAER: Do you have another copy of**  
 6 **that?**  
 7 **MR. SCHOPPE: No, I'm sorry, I don't. I**  
 8 **wasn't offering it as an exhibit.**  
 9 **THE WITNESS: (Reviewing document.) I never**  
 10 **saw that.**  
 11 **Q. (BY MR. SCHOPPE)** Can you read that aloud,  
 12 please.  
 13 **A.** "Please admit that Defendant Betty Grimm  
 14 allowed Dr. Richard Pines to visit Juvenile CM at  
 15 JCC-Nampa even after Grimm became aware that allegations  
 16 of lewd conduct involving minors had been made against  
 17 Pines." And that's not true.  
 18 **Q.** Now, is that the answer that you gave, did you  
 19 supply the answers there?  
 20 **A.** My response says "Denied." So where did that  
 21 response come from?  
 22 **Q.** I don't know. That is something to ask your  
 23 attorney. But I need you to take another quick look at  
 24 that, please. Take another look at 36, please. Read  
 25 that aloud.

1 **A.** "Please admit that Defendant Betty Grimm  
 2 personally gave recreational spending cash to Juvenile  
 3 KL in violation of IDJC policy." Response: "Defendants  
 4 object to Request For Admission No. 36 on the basis that  
 5 it is ambiguous as to time and fails to specifically  
 6 identify the juvenile such that the request can be  
 7 fairly admitted or denied. Subject to and without  
 8 waiving said objection, Defendant Betty Grimm denies the  
 9 requested admission."  
 10 **Q.** You did give [redacted] cash, right, as you  
 11 testified earlier?  
 12 **A.** Yes, once.  
 13 **Q.** So that is not your answer; you didn't give  
 14 that answer?  
 15 **MR. COLLAER: You have to look at the actual**  
 16 **request that was provided, in the context of how this is**  
 17 **posed.**  
 18 **THE WITNESS: I don't understand, Phil. I**  
 19 **just don't, I'm sorry.**  
 20 **MR. COLLAER: Your testimony stands for**  
 21 **itself.**  
 22 **Q. (BY MR. SCHOPPE)** That's fine.  
 23 So that's not an answer you supplied to  
 24 anyone?  
 25 **A.** No, sir, because I did give him money. I told

1 you that and I told the Director.  
 2 **MR. SCHOPPE: I just need about two minutes to**  
 3 **consolidate everything and wrap up, then I think we**  
 4 **should be done, as far as I'm concerned.**  
 5 **(Recess taken from 4:55 to 4:57 p.m.)**  
 6 **Q. (BY MR. SCHOPPE)** You testified a few times  
 7 today you just didn't recall certain things, like with  
 8 the e-mail, Exhibit 137 we looked at. Do you have any  
 9 memory problems that are out of the ordinary, any kind  
 10 of medical condition or anything like that that affects  
 11 your memory?  
 12 **A.** No, sir, not that I'm aware. But, you know,  
 13 I've been retired now for about almost a year. I've had  
 14 my focus elsewhere. I have no longer had to be  
 15 concerned or worried about JCC-Nampa, its staff, and the  
 16 kids. And I've been as honest as I know how to be.  
 17 **Q.** Yes. I don't mean to question that. I just  
 18 want to make sure that any time you said you don't  
 19 recall, whether it's any kind of a medical or  
 20 psychiatric or psychological condition.  
 21 **A.** Not that I'm aware of. Not yet anyway.  
 22 **Q.** Anything you testified about today that you'd  
 23 like to change or modify while it's in your head?  
 24 **A.** Not that I recall.  
 25 **MR. SCHOPPE: Okay, I think I'm done.**

1 **MR. COLLAER: No questions.**  
 2 **We would like to read and sign.**  
 3 **MR. SCHOPPE: There is one thing. I do want**  
 4 **to keep this open to deal with any questions that may**  
 5 **arise from the disks.**  
 6 **MR. COLLAER: That's fine.**  
 7 **MR. SCHOPPE: And I do still have some time**  
 8 **balance actually, we calculated up the break times and**  
 9 **things like that. But I don't think it's going to be of**  
 10 **concern at all.**  
 11 **But that's it. Thank you all. Thank you very**  
 12 **much.**  
 13 **(Deposition adjourned at 4:58 p.m.)**  
 14 **(Signature requested.)**

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 CERTIFICATE OF WITNESS  
 2 I, BETTY GRIMM, being first duly sworn, depose  
 3 and say:  
 4 That I am the witness named in the foregoing  
 5 deposition, consisting of pages 1 through 220; that I  
 6 have read said deposition and know the contents thereof;  
 7 that the questions contained therein were propounded to  
 8 me; and that the answers contained therein are true and  
 9 correct, except for any changes that I may have listed  
 10 on the Change Sheet attached hereto:  
 11 DATED this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.  
 12  
 13  
 14  
 15 BETTY GRIMM  
 16  
 17 SUBSCRIBED AND SWORN to before me this \_\_\_\_ day  
 18 of \_\_\_\_\_, 20\_\_.  
 19  
 20  
 21 NAME OF NOTARY PUBLIC \_\_\_\_\_  
 22 NOTARY PUBLIC FOR \_\_\_\_\_  
 23 RESIDING AT \_\_\_\_\_  
 24 MY COMMISSION EXPIRES \_\_\_\_\_  
 25

1 ERRATA SHEET FOR BETTY GRIMM  
 2 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 3 Reads \_\_\_\_\_  
 4 Should Read \_\_\_\_\_  
 5 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 6 Reads \_\_\_\_\_  
 7 Should Read \_\_\_\_\_  
 8 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 9 Reads \_\_\_\_\_  
 10 Should Read \_\_\_\_\_  
 11 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 12 Reads \_\_\_\_\_  
 13 Should Read \_\_\_\_\_  
 14 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 15 Reads \_\_\_\_\_  
 16 Should Read \_\_\_\_\_  
 17 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 18 Reads \_\_\_\_\_  
 19 Should Read \_\_\_\_\_  
 20 Page \_\_\_ Line \_\_\_ Reason for Change \_\_\_\_\_  
 21 Reads \_\_\_\_\_  
 22 Should Read \_\_\_\_\_  
 23 You may use another sheet if you need more room.  
 24 WITNESS SIGNATURE \_\_\_\_\_  
 25

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 REPORTER'S CERTIFICATE  
 2 I, BEVERLY BENJAMIN CSR No. 710, Certified  
 3 Shorthand Reporter, certify: That the foregoing  
 4 proceedings were taken before me at the time and place  
 5 therein set forth, at which time the witness was put  
 6 under oath by me;  
 7 That the testimony and all objections made were  
 8 recorded stenographically by me and transcribed by me or  
 9 under my direction;  
 10 That the foregoing is a true and correct record  
 11 of all testimony given, to the best of my ability;  
 12 I further certify that I am not a relative or  
 13 employee of any attorney or party, nor am I financially  
 14 interested in the action.  
 15 IN WITNESS WHEREOF, I set my hand and seal this  
 16 23rd day of September 2013.  
 17  
 18  
 19  
 20  
 21 BEVERLY A. BENJAMIN, CSR No. 710  
 22 Notary Public  
 23 P.O. Box 2636  
 24 Boise, Idaho 83701-2636  
 25 My commission expires May 28, 2019

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



<b>A</b>	87:1,20 91:3	166:20	<b>alter</b> 37:22	188:11
<b>ability</b> 5:11,17	98:13 136:8	<b>age</b> 31:5 192:17	<b>altered</b> 37:20 74:19	<b>answers</b> 39:6 54:23
74:22,24 75:4	158:15,20 159:12	<b>aggressors</b> 133:22	<b>ambiguous</b> 215:5	209:4 212:21,24
163:9,14 220:11	220:14	<b>ago</b> 4:11 38:9,18	<b>amended</b> 149:21	214:19 218:8
<b>able</b> 5:12 65:2	<b>actions</b> 90:14	66:12 78:4 134:23	<b>american</b> 9:18,21	<b>anthony</b> 16:24 17:8
72:25 132:22	104:10	135:12 142:18,25	<b>amount</b> 23:5 32:1	18:4 115:21
134:9 139:16	<b>activities</b> 200:21	193:8,8 200:8	71:18 76:15 127:5	122:23 177:15
178:20 191:3	<b>actual</b> 188:3 215:15	210:24	128:3,7,11	<b>anybody</b> 15:4
<b>aboveentitled</b> 2:7	<b>acute</b> 12:6	<b>agreed</b> 24:1	<b>anderson</b> 2:2,17	19:15 25:11 55:9
<b>abruptly</b> 19:9	<b>add</b> 38:11	<b>ags</b> 78:1	<b>andrew</b> 2:11,12 4:8	55:16,19 56:3
<b>absolutely</b> 6:7	<b>added</b> 70:22	<b>ahead</b> 12:5 19:14	<b>andy</b> 8:12 10:23	59:22 60:1 70:3
67:22 86:6 189:20	<b>addison</b> 149:3	19:15 26:16 44:8	11:25 13:1 14:3	77:24 84:23 89:3
<b>abuse</b> 31:19 33:25	201:22 207:18	49:7,25 52:20,23	26:6 31:17 37:7	89:23 102:15
34:14 68:12 92:11	<b>addition</b> 11:23	53:3,12 55:3	39:20 55:23 64:2	106:8 116:18
175:11	52:16	64:23 80:23 81:7	80:9	121:2,24 131:15
<b>academy</b> 6:21	<b>additional</b> 29:5	82:20 88:11,22	<b>angel</b> 144:20 146:5	145:8 151:4
<b>accepted</b> 8:6 9:20	56:14 113:7	89:25 90:10,18	<b>anger</b> 29:21	172:22 191:12
10:17 11:4,12	<b>addon</b> 44:17	120:2 137:6 148:5	<b>angry</b> 66:19 119:8	192:17 194:22
30:14 80:3	<b>address</b> 197:13	148:19 160:9	119:22 171:6	202:13 203:2
<b>accepting</b> 30:18	<b>addressing</b> 170:3	182:7 185:7,15	173:25 201:25	205:21 208:22
<b>access</b> 165:16	<b>adequate</b> 188:9	197:1 213:5	<b>announced</b> 19:25	212:1,17 213:25
168:11	<b>adjoined</b> 217:13	<b>aid</b> 13:1	<b>announcement</b>	<b>anyones</b> 53:21
<b>accessible</b> 84:14	<b>administers</b> 43:19	<b>aikido</b> 13:8,9,13,14	24:8 45:25 46:19	63:12 151:22
<b>accident</b> 7:2 177:12	43:23	<b>alcohol</b> 29:21	50:4 65:9 99:3	<b>anyway</b> 20:12
<b>accidental</b> 176:7,11	<b>administrative</b>	<b>allegation</b> 81:24	<b>annual</b> 142:21	115:19 193:2,25
<b>accommodate</b>	79:15 86:24 87:16	92:24 151:8	<b>answer</b> 5:23 17:5,6	216:21
190:10	91:1 137:3,11	<b>allegations</b> 56:16	19:15,15 25:16	<b>apart</b> 55:8,18 57:9
<b>accommodation</b>	138:2	56:17,22 57:1	26:6,12,16 49:11	<b>apartment</b> 165:23
190:14	<b>administrators</b>	60:13,20 134:25	50:1 52:22,23	165:24
<b>accompanied</b> 62:14	43:20,24	135:8,9 148:8	53:4,13 55:15,21	<b>apologies</b> 59:21
<b>accomplish</b> 132:8	<b>admission</b> 215:4,9	151:6,17 153:2,7	57:10,16 63:15	<b>apologize</b> 92:5
<b>accountable</b> 24:23	<b>admissions</b> 54:4,8	214:15	64:2 80:23,23	114:2 181:1
25:1,2,11,21	54:17 212:22	<b>allgirls</b> 6:22	88:10 96:12,13	210:17
35:23,24 89:18	213:21 214:3	<b>allowed</b> 78:25	107:23 109:5	<b>apparently</b> 75:17
<b>accrued</b> 190:13	<b>admit</b> 214:13 215:1	145:9 162:8 163:3	119:7 132:25	<b>applicant</b> 15:2
192:7	<b>admitted</b> 89:17	165:16 167:25	134:23 140:5	46:24 50:25
<b>accurate</b> 174:5	154:7 215:7	168:11 214:14	146:12,24 148:19	<b>applicants</b> 16:5
<b>accusation</b> 66:16	<b>adult</b> 22:18	<b>allstaff</b> 101:22	151:15 155:21	24:6 45:10 50:19
<b>accused</b> 66:13 67:4	<b>advice</b> 85:24 86:4,7	102:6 106:22	158:24 160:9	97:24 107:24
92:14 142:11	146:21,22 179:10	110:5,20 111:12	183:11 185:7	156:11 182:2
<b>acreage</b> 23:12	<b>advised</b> 83:9,12	114:13,17 116:24	187:18 188:6	<b>application</b> 10:13
<b>act</b> 22:5 26:23 27:1	<b>advising</b> 102:20	117:12 118:12	196:8 208:14	23:15 45:8 50:17
28:4 133:17 137:4	<b>advisory</b> 40:8	119:1 120:7	214:18 215:13,14	50:21 107:8 185:3
137:12	<b>affair</b> 210:2	121:21 122:7	215:23	<b>applications</b> 50:24
<b>acted</b> 131:9 195:5	<b>affidavit</b> 4:20	148:15 159:20	<b>answered</b> 6:11	<b>applied</b> 8:5,20 9:6
<b>acting</b> 22:23 23:17	136:12	<b>aloud</b> 214:11,25	26:16 81:7 146:10	9:16,18 10:9
26:8 177:20	<b>aftercare</b> 40:2	<b>alphonsus</b> 10:9,22	148:19,21 181:17	23:15 24:2 45:12
<b>action</b> 67:12 85:7	<b>afternoon</b> 61:9	<b>als</b> 10:11,16,17 11:5	183:1 184:25	45:14 46:1 97:16

97:20,22 99:16	<b>areas</b> 43:9 118:11	187:24	<b>aware</b> 31:1 34:16	211:14
108:15,18 109:13	<b>arms</b> 176:3	<b>assist</b> 12:4 176:5	37:19 41:16,19,25	<b>background</b> 6:13
126:22 187:16	<b>arrangements</b>	<b>assistance</b> 85:17	42:1 49:14 50:10	155:13 158:1
<b>applies</b> 137:16	191:17	197:23 198:1,10	50:15,18 59:25	<b>backyard</b> 70:21
142:4	<b>art</b> 13:10	<b>assistant</b> 8:8	62:8 63:4 74:11	72:4
<b>apply</b> 11:6 14:23	<b>arts</b> 80:4	<b>assistants</b> 8:4	74:14,17,20 75:3	<b>bad</b> 170:17
15:4,21 22:19,21	<b>ashley</b> 28:21 79:4	<b>assisting</b> 95:2	75:5 81:2 85:4,7,9	<b>balance</b> 217:8
137:4 138:2	93:13 152:9,20	<b>associated</b> 192:21	89:7 98:2 101:1	<b>balloon</b> 164:1
<b>applying</b> 22:25	<b>ashleys</b> 152:12,13	<b>associates</b> 8:22	104:15 122:25	<b>balls</b> 111:9
127:12	152:15	<b>assume</b> 157:9	130:22 135:5	<b>bank</b> 7:17
<b>appoint</b> 16:1	<b>asked</b> 6:11 26:15	<b>assumes</b> 106:11	137:10,15,22	<b>baranco</b> 110:24
<b>appointed</b> 14:4	39:4 41:10 46:24	<b>assuming</b> 22:21	143:20,25 150:22	111:1,2,8
16:23 125:11	70:19 79:21 81:6	98:6 104:21	152:16 153:2,7	<b>barancos</b> 111:7
130:8	81:21 102:25	<b>attached</b> 175:19	154:22,23 155:3	<b>barker</b> 162:16,19
<b>appointment</b> 103:7	109:22 115:16	218:10	165:15 167:14	162:23
103:8	135:14 143:10	<b>attempted</b> 176:4	168:25 172:15	<b>barris</b> 211:20
<b>appraisals</b> 65:13	144:20 145:5	199:24	175:21 177:6	<b>based</b> 39:14 47:2
199:23	148:19 161:5	<b>attempting</b> 176:12	184:18 185:11,17	48:20 50:25 161:6
<b>appreciated</b> 175:6	174:10 175:11,12	197:13	185:21 188:2	179:10
<b>approach</b> 131:13	184:24 195:6	<b>attend</b> 27:21,22	192:15 193:3	<b>basic</b> 12:3 31:16
175:1	201:6,14 202:4	159:22	197:4,16 198:2,14	<b>basically</b> 171:19
<b>approached</b> 8:15	206:22	<b>attended</b> 30:3	198:16,22 199:3,8	<b>basis</b> 138:21 157:24
15:24 22:24,25	<b>asking</b> 5:24 32:6	99:24 150:15	199:15 201:1	174:4 177:5 188:5
98:7 174:9	81:14 90:25,25	<b>attending</b> 27:17	202:9 203:5	215:4
<b>appropriate</b> 12:18	112:18 121:1	159:24	205:22,23 214:15	<b>bates</b> 82:18
13:4,13 30:11	127:20 145:2,6,9	<b>attention</b> 106:3,3	216:12,21	<b>battery</b> 159:6,8
37:6 61:25 64:16	156:8 173:23	119:10		<b>bear</b> 19:23
76:16 100:3 105:2	177:10 183:4	<b>attorney</b> 5:2,3	<b>B</b>	<b>becoming</b> 17:20
141:21 179:23	184:6 205:16	52:17 55:8,18	<b>b</b> 3:5 74:2	<b>beds</b> 23:8
186:4 197:3	<b>aspects</b> 27:15	62:13 214:23	<b>back</b> 7:15,19,23 8:1	<b>bedtime</b> 128:14
201:11 206:5	<b>assault</b> 35:6,9	220:13	9:25 18:21 21:15	<b>beginning</b> 52:15
209:25	70:24 175:24	<b>attorneyclient</b>	21:18,24 22:14	68:5 90:5 185:24
<b>appropriately</b> 26:4	176:9,20 177:19	52:22	31:11 46:8 49:2	<b>behalf</b> 2:2 155:2
48:17 70:22 173:1	<b>assaulted</b> 35:7 36:8	<b>attorneys</b> 57:9	54:6 65:5,17,21	<b>behavior</b> 127:3,17
<b>approval</b> 47:8 48:7	131:20,23,23	<b>august</b> 66:3 77:10	66:19 68:4 72:25	128:13 132:21
109:5	132:2,3 175:23	<b>author</b> 37:23	73:1,3,5 79:18	145:22 188:1
<b>approve</b> 37:15	177:12	<b>authority</b> 74:21,24	80:25 81:1 83:15	<b>behavioral</b> 131:8
48:11 100:22	<b>assaults</b> 36:20	185:2,8	91:7 94:2,19	<b>belief</b> 19:18 101:19
192:6	41:13 130:25	<b>authorized</b> 101:8	95:18 108:10	<b>believe</b> 5:15 16:6
<b>approved</b> 97:4,5	134:1,7	<b>authorizing</b> 147:15	111:17,18 118:12	16:20 22:11 28:21
108:23 156:4	<b>assert</b> 55:14	<b>auxiliary</b> 8:19	119:1 124:11	32:3 37:11 60:6,8
<b>approves</b> 100:17	<b>assessment</b> 66:14	<b>available</b> 22:10	125:2 130:8	61:15 65:24 85:5
<b>approving</b> 109:2	111:25 129:7	49:4 58:11 90:15	133:15 152:5	86:18 87:16 89:18
140:3	<b>assign</b> 188:17	179:16 182:2	154:25 173:21	91:4,15 93:22
<b>april</b> 144:3	<b>assigned</b> 29:4 30:6	<b>average</b> 128:25	174:3,18 177:4	99:16 100:23
<b>archived</b> 73:8,10	125:11 203:19	129:11,18	183:10,12 186:2	104:23 107:17
<b>area</b> 84:12 175:5,15	<b>assignment</b> 195:18	<b>awarded</b> 8:19,21	189:22 191:3,11	114:24 115:1,17
181:4,7 183:7	<b>assignments</b> 30:25	<b>awards</b> 80:5	195:6 200:13	130:18 136:20

140:18 142:11,19 145:24 146:1 148:18 160:24 175:19 176:4,6 177:4 178:21 188:21 198:10 200:7 201:24 204:5 207:1 210:13	<b>billy</b> 36:6,7 163:6 <b>birdhouses</b> 194:18 <b>birthday</b> 192:25 <b>bishop</b> 2:24 70:7 143:11,14 181:18 <b>bit</b> 6:13 175:14 195:3 <b>bladder</b> 191:8 <b>blanks</b> 29:1 <b>blind</b> 175:16 <b>blood</b> 191:1 <b>board</b> 8:23,24 12:2 31:2,3,7,8,9 40:9 80:8,9 143:21 194:13,14 <b>bob</b> 1:6 115:12 149:6 162:16,19 162:23 <b>bobbi</b> 193:23 194:4 <b>boeing</b> 9:15,23 <b>boise</b> 2:3,14,22 211:4 220:24 <b>book</b> 138:8,11 <b>boom</b> 105:4 <b>booth</b> 73:22 74:4 108:8 <b>border</b> 140:2 <b>bottle</b> 163:25 164:1 <b>bottom</b> 83:4 87:24 <b>bought</b> 23:12 <b>bounce</b> 167:3 <b>box</b> 2:21 220:23 <b>bradley</b> 154:13 <b>breaches</b> 163:22,23 164:2 <b>break</b> 6:10 41:8 111:8 189:19 194:17 217:8 <b>brent</b> 14:5 15:25 <b>brief</b> 67:15 <b>briefing</b> 142:13 143:9 146:14 <b>briefly</b> 155:5 <b>bring</b> 23:20 75:16 83:15 105:1 164:12 191:3 <b>bringing</b> 119:10 <b>broken</b> 101:21	<b>brothers</b> 7:23 <b>brought</b> 10:11 30:10 64:20,22 70:17 76:1 79:18 79:19 80:8,9 106:2,3,21 139:19 <b>bryce</b> 79:2,15,18,20 79:20,23 80:2,12 82:8,10 93:12 152:8 153:1 <b>bsu</b> 99:24 101:3,4,9 109:18 <b>bucket</b> 116:25 117:3,4,5,9,20,21 <b>budget</b> 48:13,14 <b>build</b> 9:25 23:12 <b>building</b> 9:14 10:8 16:21 20:21,23 174:17 <b>built</b> 211:3 <b>bulletin</b> 194:13,13 <b>bunch</b> 45:15 <b>business</b> 194:10,16 210:14 <b>businesses</b> 194:10 <b>buttons</b> 161:21	208:8 211:20 <b>callicutt</b> 15:13 18:14,16,20 21:15 22:5,12,14,16,25 23:18,25 38:19 80:7,7 160:4 <b>calls</b> 16:9 20:6,7 44:8 49:24 80:22 88:17 89:21,21 90:9,9,17 96:11 119:25 120:23 137:5,17 144:11 158:23 160:8,19 182:6 185:5 196:25 206:21 <b>cameras</b> 72:1,3 <b>cancer</b> 191:19 <b>candidate</b> 47:3,20 48:9,12 178:21 181:20 205:8 <b>candidates</b> 99:3,16 181:23 <b>cant</b> 8:5 10:23 13:2 13:5,7 14:2 15:16 24:7 25:9 28:18 29:17,18,19 32:20 40:7 44:20 45:15 57:20,24 58:24 59:6,15 67:13 69:7 70:7 71:21 77:7 79:13 96:12 102:1 103:13 107:7,16 110:23 111:1 112:2,2 113:14 117:9 118:21 119:20 125:6 127:1,18 143:15 144:14 151:20 154:4,12 159:7 160:10 163:17,18 170:25 181:24 184:21 187:11 188:6 190:3,17 193:25 206:9 207:6 208:14,14,15 209:16 210:16 211:8,10,12	213:15 <b>canyon</b> 35:16 <b>capability</b> 168:15 <b>capacities</b> 1:12,13 <b>capacity</b> 95:10,10 141:9 <b>card</b> 39:2,24,25 110:18 150:4 151:10,17 189:23 191:11 192:25 211:6 <b>cardiologist</b> 12:2 <b>cards</b> 44:1 150:17 151:9 192:25 <b>care</b> 12:6 65:15,19 92:17 143:1,5 <b>carnell</b> 123:6 149:6 170:25 171:17 173:5,23,25 174:9 174:9 175:2 <b>carnells</b> 174:24 <b>carried</b> 48:16,16 79:16 92:16 <b>carry</b> 65:2 162:23 <b>case</b> 1:7 4:21 53:23 55:19,23 60:22,24 106:15 135:23 154:21 156:10 158:3 176:10 177:16 182:5,24 188:11 CY 60:9 63:5,11 63:14,18 64:6 66:6 67:24 68:8 69:20,23 71:13,19 72:16,23 74:16 75:8 76:2 77:2 84:1,25 85:15,24 89:4 91:9,13,16 91:18 92:14 136:25 165:18 <b>cash</b> 166:6 167:8,13 215:2,10 <b>catalog</b> 162:23 <b>catch</b> 88:10 187:12 <b>catholic</b> 6:21 <b>cause</b> 4:3 31:15 126:11,24,25
			<b>C</b>	
		<b>c</b> 2:9,19 29:8 <b>cabinet</b> 165:9 <b>cabrera</b> 192:14 193:4 <b>calculated</b> 217:8 <b>call</b> 10:24 11:12 16:18 19:18,22 20:5 36:7 46:12 78:19 102:20 108:10 127:4 152:18 166:10 177:20 178:18 186:8 196:1,3 207:24 <b>called</b> 12:6 13:5 23:7 32:21 50:23 80:5 107:9 116:25 132:12 142:24 152:19,20 166:12 166:18 173:16		

202:16,17	<b>characterization</b>	<b>claimed</b> 110:10	<b>code</b> 68:17	44:2 51:15 59:8
<b>caused</b> 191:8	84:7 171:8	189:25 191:13	<b>coded</b> 190:12	61:5,8 62:1,3,5
<b>cautioned</b> 63:21	<b>charge</b> 9:19 10:18	<b>claims</b> 177:17	<b>collaer</b> 2:18 13:21	65:7 71:20 75:25
<b>center</b> 1:12 16:15	19:10 30:18 51:9	<b>clarify</b> 6:7 115:16	13:24 14:15 16:8	76:17 80:1,6 94:6
<b>centers</b> 137:16	51:25 52:3,6	<b>class</b> 8:3,6	19:13 24:16 25:14	98:4 110:17
<b>certa</b> 61:15 63:3	155:4,20 156:3	<b>classes</b> 27:14,17,18	26:15 34:1 39:21	126:25 128:2
75:7 93:2,4	157:15 192:7	27:22 29:21,22	41:2,7 44:7 49:6,9	132:5,22 136:17
<b>certain</b> 12:24 32:1	<b>charged</b> 143:20	<b>classroom</b> 72:7	49:23 52:20,25	139:14 140:20
113:17 150:4	144:7	74:2	53:11,16,18 54:10	141:25 143:16
187:11 216:7	<b>charges</b> 35:8,10	<b>classrooms</b> 84:14	54:22 55:3,14	150:6 162:14
<b>certainly</b> 27:2	62:2 132:3,4	<b>clayton</b> 140:21,22	58:5 59:4,18,23	178:11 188:18
194:7	136:5 143:25	140:23 143:11	61:18 64:7 68:9	194:8 200:11
<b>certificate</b> 218:1	154:23 155:23	144:6 147:12,16	71:14 77:11 80:17	214:21
220:1	<b>check</b> 7:3 107:9	148:9	80:22 81:6 88:8	<b>comes</b> 18:21 20:13
<b>certification</b> 8:3	166:20 193:13,13	<b>clean</b> 179:4	88:11,17,21 89:20	118:9
12:2,6 80:4	<b>checking</b> 162:12	<b>clear</b> 65:14 131:15	90:8,16,20 96:3	<b>coming</b> 4:7 17:4
155:10 157:18,23	<b>cheese</b> 10:4	141:17 169:20	96:10 104:21	55:24 72:12 106:8
<b>certifications</b> 11:24	<b>child</b> 7:7,8,9,18 8:4	170:12 172:13	105:23 106:1,11	131:3 139:18
12:17	31:19,24 34:14	<b>clearly</b> 131:9	106:16 111:16	143:10 144:21
<b>certified</b> 2:5 12:2,3	112:9 126:23	<b>clients</b> 166:13	119:3,25 120:22	148:10 151:24
13:3 155:1 157:13	127:15 128:12	<b>clinical</b> 30:8,20	134:20 136:1,9	154:5 162:12
157:17 220:2	131:9,11 140:3,23	<b>clinician</b> 30:4	137:5,13,17 138:3	188:20,22
<b>certify</b> 220:3,12	141:21,21	111:10	143:13,22 144:11	<b>commencing</b> 2:4
<b>chain</b> 3:7 36:5	<b>children</b> 7:12,14,16	<b>clock</b> 103:4	146:20 147:1	<b>comment</b> 160:9
<b>challenges</b> 170:14	7:22 8:12 25:23	<b>close</b> 57:25 58:8	148:4,18 149:20	195:12 205:20
170:19	26:3 69:16 111:11	152:2	151:7,11 152:4	<b>comments</b> 162:10
<b>challenging</b> 165:25	126:9 140:18	<b>closed</b> 76:1	157:19 158:22	184:1 205:17
169:12 170:17,23	141:11 143:2	<b>closely</b> 10:19	160:7,19 163:13	206:2
204:16	155:21	<b>closer</b> 151:22,23	164:7 176:24	<b>commission</b> 134:13
<b>chance</b> 4:23 5:4	<b>childrens</b> 7:10	<b>clothing</b> 162:24	181:12 182:6,11	135:12 218:24
28:24 54:9 80:8	127:11,21 140:16	<b>clots</b> 191:1	182:15 183:10,14	220:25
<b>change</b> 37:22,24	141:7,14,23,24	<b>cloud</b> 3:7,11 52:2,9	184:24 185:5,13	<b>commit</b> 157:7
74:10 139:8 160:3	142:17,20 143:3	56:6,7,25 57:5,18	196:16,24 198:19	<b>commitment</b> 30:7
160:10 180:12	<b>choices</b> 20:11 29:7	65:3,7 70:6 77:20	199:5 200:16,18	140:4
183:16,21 184:6	29:18 37:8 45:3	83:2,19,24 84:20	202:24 205:16	<b>committed</b> 17:3
185:9 216:23	69:2,16 80:3	85:4,16,22 86:16	213:7 214:5	34:21
218:10 219:2,4,7	94:14,15,19 95:16	87:23 90:4 98:7	215:15,20 217:1,6	<b>committee</b> 23:4
219:9,12,14,17,19	129:24 169:7	100:1 101:11,15	<b>collected</b> 40:13	39:15,17 40:4
219:22	179:19,24,25	110:3 124:7	43:4	117:25 118:3
<b>changed</b> 37:20	180:10 183:19	181:18 207:12	<b>collective</b> 179:22	138:17,18,19
130:12 139:1,7	<b>christmas</b> 22:15	208:16,19 209:8	181:19 183:2	<b>common</b> 193:17
174:20 182:19	<b>circulated</b> 102:10	210:10,13,13	<b>college</b> 7:4,25 8:10	<b>communicate</b> 58:4
184:19 204:20	117:1	<b>club</b> 115:9,14	8:11,13,16,22 9:5	<b>communicated</b>
<b>changes</b> 43:12,15	<b>circulating</b> 103:23	117:16	51:18	57:14
74:22 117:7	<b>civil</b> 133:16	<b>cm</b> 214:14	<b>columbia</b> 4:14 7:21	<b>communicating</b>
118:17,17,23	<b>cjca</b> 43:24	<b>coached</b> 63:21	8:1,10,21	34:3
139:3 171:25	<b>claim</b> 4:21 60:11	<b>coaching</b> 46:13,15	<b>come</b> 20:17,24	<b>communication</b>
172:1,2,3,4 218:9	136:25	49:3	23:22 35:11 39:17	52:22 57:12,13



58:1,9 <b>community</b> 8:10,22 <b>comp</b> 177:17 <b>company</b> 7:2 <b>compares</b> 128:6 <b>comparing</b> 129:3 <b>complaining</b> 136:21 <b>complaint</b> 149:22 <b>complaints</b> 131:3 188:19 204:20 206:20 <b>complete</b> 35:4 132:21 <b>completed</b> 8:6,14 9:23 32:2 80:3 177:13 <b>completing</b> 28:13 132:21 199:24 <b>compliance</b> 28:7 <b>complied</b> 28:2 185:12 <b>compound</b> 164:8 <b>computer</b> 72:6 75:18,20,25 202:15,24 <b>concern</b> 28:13 39:11 61:20,23 63:12 64:9 67:25 67:25 68:22 71:5 72:20 83:2 97:8 101:19 104:1 111:14 112:10,15 117:16 119:11 126:24,25 129:20 129:21 130:15 133:3,24 134:4,5 134:7,8 144:15 148:7 150:3 217:10 <b>concerned</b> 34:22 63:25 64:5,11 68:18,19 71:2 72:14 109:16 121:4 139:10 208:12 210:11 216:4,15 <b>concerning</b> 30:24	46:10 55:9 56:22 57:2 85:22 192:16 194:9 200:21 <b>concerns</b> 19:6 58:25 63:15 67:23 69:21,25 70:9 76:17 77:16 84:15 84:17,20,25 85:3 90:3 94:4 102:10 104:2,14 105:6,10 105:13 106:9,12 106:19,19,25 111:24 112:4 114:15,21 116:22 117:12,15 118:1,7 118:25 119:18 122:13,18 130:23 130:24 133:3,7 148:21 149:10,15 153:13,24 161:14 161:15,16 162:7 169:24 170:3 188:18 201:15 204:23 212:7 <b>conclusion</b> 49:24 80:23 89:22 90:9 137:6,18 182:7 185:6 <b>condition</b> 21:10 176:25 216:10,20 <b>conditions</b> 122:19 122:21 <b>conduct</b> 28:12 62:3 63:13 67:24 70:10 71:12,15,16 72:21 143:21 153:3 171:9 214:16 <b>conducted</b> 62:9,12 93:20 <b>conference</b> 115:8 <b>conferences</b> 55:8 <b>confidence</b> 48:21 <b>confined</b> 18:8 31:15 <b>confiscated</b> 75:18 <b>confused</b> 179:19 <b>confusing</b> 6:6 <b>connect</b> 117:20	<b>connected</b> 117:10 117:11,14 <b>connection</b> 40:23 135:22 136:5,25 183:5 <b>consequenced</b> 131:5 <b>consequences</b> 164:21 <b>consider</b> 23:9 46:21 155:6 162:1 209:23 210:1 <b>considerable</b> 76:15 <b>consideration</b> 181:22 <b>considered</b> 16:11 179:13 204:16 <b>consisted</b> 138:19 <b>consisting</b> 218:5 <b>consolidate</b> 216:3 <b>constant</b> 209:5 <b>constantly</b> 80:5 <b>consult</b> 5:4 <b>consulting</b> 52:16 <b>contact</b> 35:8 68:7 76:11 142:24 144:16 159:15 <b>contacted</b> 35:11 61:1 67:17,20 75:14 80:16 81:21 92:17 102:23 132:5 159:10 208:1 <b>contained</b> 218:7,8 <b>contemplated</b> 67:12 86:25 87:20 91:3 <b>contents</b> 218:6 <b>context</b> 12:12 59:4 89:8 92:19 133:16 155:9 185:19 186:5 202:21 215:16 <b>continue</b> 30:16 65:11 <b>continued</b> 9:2 64:19,22 175:10 <b>continuing</b> 77:18	86:20 <b>contraband</b> 162:8 164:15 <b>contract</b> 30:21 132:13 140:16,25 141:2,6,8 142:22 142:25 <b>control</b> 26:6 73:22 74:4 108:7 127:17 176:1,14 <b>conversation</b> 64:19 76:20 83:18,21,23 84:3 110:21 175:16 195:14 199:17,18 200:4 <b>conversations</b> 56:10 72:10 <b>convicted</b> 157:2,22 158:4,21 159:1 <b>conviction</b> 157:3 <b>convictions</b> 156:12 <b>cooccurring</b> 29:16 <b>cook</b> 33:6 78:20 80:9 <b>cooperated</b> 76:22 <b>coordinator</b> 28:10 28:10,15,16,20 30:6 37:12 38:7,8 42:8,9,12,16 43:11 44:11,14 45:6 46:1 113:22 173:10,11 192:5 <b>copy</b> 82:15 87:5 198:8 214:5 <b>coronado</b> 150:19 151:8,11 <b>corps</b> 80:4 107:6,10 107:18 <b>correct</b> 42:11,14 43:18,22,25 98:17 105:8 121:9 123:22 133:20,23 142:5 149:23 159:21 165:22 169:5 218:9 220:10 <b>correctional</b> 205:9 <b>corrections</b> 1:10,12	2:16 4:17 11:8,10 12:13,21 13:22,23 14:11 16:15 17:11 22:18,18,20 26:23 26:25 28:4 29:1 40:5,8,11 43:19 43:23 129:4 137:12 <b>cost</b> 93:7 <b>cotton</b> 28:19 29:6 101:6 <b>couldnt</b> 20:18 21:7 99:9 134:23 139:8 173:11 191:9 <b>council</b> 43:19,23 <b>counsel</b> 34:1 41:7 53:18 88:19 90:20 143:12 146:14 147:2 <b>counseled</b> 63:22 <b>counties</b> 17:4 <b>county</b> 35:16 <b>couple</b> 20:7 21:12 52:9 76:3 92:13 118:10 121:14 123:24 161:20 163:7,21 174:15 174:15 186:11 205:25 210:22 <b>course</b> 8:6,14 13:6 99:24 101:9,12 134:8 177:18 178:5 <b>courses</b> 8:11 100:10 <b>court</b> 1:1 5:9 35:5 89:7 135:15 136:2 136:2 157:14 <b>courts</b> 30:22,25,25 <b>cover</b> 188:9 213:1 <b>coverage</b> 187:20 <b>covered</b> 27:19 <b>cpr</b> 13:1 <b>craftsman</b> 35:4 115:10 <b>create</b> 199:13 <b>created</b> 206:7 <b>credible</b> 71:3 <b>crime</b> 34:21 35:2
--	---	---	--	---



161:23,25 165:25 <b>dinner</b> 128:19 <b>diploma</b> 6:22 <b>direct</b> 103:9 <b>direction</b> 98:15 220:9 <b>directive</b> 182:23 183:4,13,14,17,20 183:22 184:7,19 185:20 <b>directives</b> 77:18 122:11 185:10 <b>directly</b> 47:24 61:8 171:20 189:5 <b>director</b> 1:11 14:5 15:24 18:12,14 19:18,20 20:4 22:17,20,24 23:16 23:17 24:10 25:4 27:12 35:1,20,21 35:24,25 36:3,7,8 38:19,20,25 39:9 47:7,16 57:12,21 57:25 58:7,14,16 59:16,18 61:2 70:1 75:14 77:15 77:17,19 78:9 79:17 80:6,7 83:3 84:15,19,22 85:3 85:16,21 86:16 90:4 102:23,24 103:10,15 109:2 113:6 114:17 115:16 116:12 119:17 120:5,11 120:15 124:8 131:6 138:20 139:20 155:2,3 159:19 160:4,4,11 164:19 167:14 179:11 181:18 182:20 183:16,21 184:6,20 185:20 190:7,19 201:7,21 205:5 211:2 216:1 <b>directors</b> 30:20 129:22 184:11,13 <b>disabilities</b> 190:9	<b>disability</b> 190:10 <b>disagree</b> 84:10 <b>disagreed</b> 116:3 <b>disappointing</b> 88:16,18 <b>disciplinary</b> 104:10 158:15,20 159:12 187:6 205:24 <b>discipline</b> 85:8 <b>disciplined</b> 122:4,5 122:6 <b>disciplining</b> 46:11 <b>disclose</b> 156:12 <b>disclosed</b> 31:24 <b>disclosure</b> 32:2,23 33:4,8,17 <b>discord</b> 197:9 <b>discouraged</b> 42:2,5 <b>discovered</b> 63:9 75:7 <b>discovery</b> 53:9,14 53:15 54:6,11,21 82:15 87:10 <b>discretion</b> 184:11 190:16 <b>discrimination</b> 56:23 57:3 <b>discuss</b> 47:1 56:16 56:17,18,21,25 57:22 58:18 60:22 60:24 61:4 84:15 96:17,19,22,24 103:16 186:25 187:8 194:23 195:19 <b>discussed</b> 31:11 46:9 55:12,19,22 57:18 60:25 61:1 61:2,3 144:18 147:7 152:8 203:21 <b>discussing</b> 84:22 85:15 195:18 204:6 210:4 <b>discussion</b> 66:2 139:20 181:25 182:3 190:18 <b>discussions</b> 85:21	114:14 <b>disk</b> 73:14 <b>disks</b> 217:5 <b>display</b> 70:21 <b>disposed</b> 165:10 <b>dispute</b> 89:4 170:10 <b>disputes</b> 89:3 170:3 <b>disqualified</b> 156:16 <b>disrespectful</b> 169:13 170:16 <b>distention</b> 193:18 <b>distinctly</b> 20:10 <b>distinguish</b> 188:3 <b>distributed</b> 184:1 <b>district</b> 1:1,2 193:24 <b>divided</b> 212:2,4 <b>dividing</b> 211:24 <b>divorce</b> 7:13,14 <b>doctor</b> 12:8 142:2 191:9,10 <b>document</b> 32:22 37:4 67:7 82:14 82:17,22,23,24 83:5 87:5,7 88:9 117:19,20,23 206:14,15,18 212:23 213:20 214:9 <b>documentation</b> 28:13 32:1,2,4 35:4 48:17 <b>documented</b> 41:13 74:5,16 <b>documents</b> 52:17 54:1,8,16 82:18 157:14 213:2,10 213:11,19,24 <b>doesnt</b> 157:22 159:4 198:20 <b>dog</b> 26:18 155:4 <b>doing</b> 44:17 63:25 64:5,14 72:17 88:3 128:15 175:18 181:8 194:15 200:22 202:2,2 203:3 <b>dont</b> 5:2,15,19 6:5	7:5 11:25 14:6,7 14:15,16,17,17,20 15:10 16:6,10 17:14,18 19:3 21:9,21 22:1,4 24:17,18 28:18 29:23 31:4 34:2 40:9,17 41:3 42:10,20 44:5,9 45:18 46:5 49:8 49:10,10 51:7,10 51:15 53:14,24 57:7,7,10 61:19 62:14 63:8 65:24 66:4 67:10 70:11 73:6 74:23 77:10 77:11,11,12 78:6 79:6 80:17 81:18 82:11,16 83:20 84:21 85:1 87:8 87:11 88:1,5 89:2 89:6,12 90:11,11 90:18,18,19 91:4 91:25 92:4,5,8,8,9 92:21 93:5,17,17 93:24 94:21 95:4 96:6,14,15 97:15 97:23 98:12,22 99:20 101:17 103:5 106:7 108:1 108:14,20 110:16 110:23 111:19 113:18,24 114:1,2 114:7 116:1,15,15 116:19 117:4,17 117:20 118:16,24 120:3,24 121:11 122:8,20 124:6,17 124:17 125:12 128:10 130:11,12 130:18 132:10,11 132:14,25 133:14 134:3,14,16 135:4 136:16,23 137:7,9 137:14 140:24 142:11 143:13,19 144:2,5,5,12,17 145:4,7,7,14,18	146:3,6,10 147:11 147:12,14 148:10 148:13,25 149:24 153:11,19 154:4,9 154:11,18 156:23 156:24 157:8,9,17 158:24 159:9,13 159:16 160:21 161:2 165:24 166:5 168:9,19 170:16,18,21 172:12,21 175:24 176:2,16,17,17,24 177:1 178:4 179:5 179:7 180:19,20 180:22,24 181:1,8 182:8 184:21 185:1,8,16 187:4 188:6,7,20,22 189:14 191:15 192:1,12 194:7,22 195:11,12 196:19 197:8,19 198:5 199:19 200:2,3 201:18,19,25 204:14,18,22 205:1,10,11,15,19 207:10,13,16 208:24,24 209:7 209:13 210:6,7,17 212:3,13 213:17 214:7,22 215:18 215:19 216:17,18 217:9 <b>door</b> 67:16,20 76:1 77:9 91:18 127:15 194:16,16 <b>doors</b> 21:5,7 <b>doubt</b> 174:24 <b>downloaded</b> 73:14 <b>dr</b> 140:6,15,15,17 140:19 141:25,25 142:6,14,14,24 143:10,17 144:6 144:21 145:9 147:7,7,16,20 214:14 <b>draft</b> 139:2
---	--	---	--	--

<b>drawn</b> 8:11 198:7,8 199:16	<b>effectively</b> 101:8	104:3,7,13 105:17	193:4,7,14,15,19	51:3,18 96:2,9,18
<b>drew</b> 198:14	<b>effects</b> 176:23	105:21 114:5,14	<b>estelas</b> 193:12	97:10,14,25 99:22
<b>drive</b> 23:13	<b>effort</b> 28:24	115:5 116:21	<b>evening</b> 61:10 77:1	100:4 107:2,5,10
<b>driving</b> 155:23	<b>eight</b> 7:22 10:23	117:6 130:23	108:8 187:22	107:18,25 109:15
156:1,3	17:15 190:11	143:8 144:19	<b>event</b> 158:20	190:21
<b>drug</b> 29:21	<b>either</b> 8:4 30:13	150:1,5 156:11	<b>eventually</b> 7:4	<b>expert</b> 50:23
<b>drugs</b> 5:14 163:3	34:4 44:3 85:6	157:2,17,17	99:11,12 110:25	<b>expertise</b> 10:20
163:25,25 164:12	93:14 123:8	159:19 170:4	165:10	11:10 190:20
<b>drunk</b> 5:14	176:16 189:23	171:22 172:5	<b>everybody</b> 68:3	<b>expires</b> 218:24
<b>due</b> 65:13	208:16	178:9 181:23	146:16 164:10	220:25
<b>dui</b> 155:4,23 158:4	<b>elaborate</b> 154:4	196:13 201:22	<b>exactly</b> 65:24 78:23	<b>explain</b> 53:19
158:5 159:3	<b>electronic</b> 38:2 74:6	202:11	93:5 145:4 176:11	<b>explained</b> 16:2
<b>duis</b> 156:5	74:7	<b>employment</b> 17:10	178:14	<b>explanation</b> 53:19
<b>duke</b> 206:12	<b>eligible</b> 156:19,22	156:5,11,19 169:4	<b>exam</b> 8:7	71:3 129:10,14
<b>duly</b> 4:2 218:2	<b>elizabeth</b> 11:22	170:9 171:24	<b>examination</b> 3:3	<b>exposed</b> 133:21
<b>duties</b> 26:7 29:5	<b>elses</b> 121:2 152:1	<b>encourage</b> 64:6,7	4:5	187:14
158:10	<b>email</b> 3:7,10 57:11	<b>encouraged</b> 65:7	<b>example</b> 5:13 12:18	<b>exposure</b> 187:11,12
<b>duty</b> 5:7 26:7 29:2	57:13,15 87:3	170:5	37:7 39:20 51:18	<b>express</b> 89:25
29:4 33:2	168:12 199:18	<b>encouraging</b>	66:25 73:14 131:1	101:19 112:16
<b>dying</b> 191:19	202:10 203:3	114:20 139:22	156:10 162:4	122:13,18 133:2
	207:4 216:8	<b>ended</b> 176:5	165:1 194:11	133:24 149:10,15
	<b>emailed</b> 109:7	<b>enforced</b> 164:4	201:23 202:19	150:3 162:7
	<b>emails</b> 57:5,8	<b>enforcement</b> 35:8	<b>exception</b> 52:20	<b>expressed</b> 63:19
	202:11,23	35:10,11 132:4	<b>exceptions</b> 34:16	64:12 84:20 105:9
<b>E</b>	<b>emotional</b> 55:24	<b>engaged</b> 157:16	49:14 50:10 164:4	105:13 106:10
<b>e</b> 2:9,9 3:1,5	<b>employed</b> 49:17	<b>ensure</b> 26:8 28:2	<b>excessive</b> 126:19,20	111:14,24 112:5
<b>earlier</b> 31:12 46:9	80:1	131:10 175:18	129:19 130:17,19	122:23 133:4
87:17 93:13 110:7	<b>employee</b> 59:16	<b>ensured</b> 126:7,9,10	<b>exchange</b> 8:16 57:5	148:11 205:2
113:16 120:9	60:14,15 62:14	<b>ensuring</b> 28:7	<b>exchanged</b> 54:6	<b>expresses</b> 104:14
136:10 152:8	65:13 66:16,19,19	<b>entail</b> 95:13	<b>exchanging</b> 57:8	<b>expressing</b> 102:10
159:17 178:14	66:20 87:21 94:3	<b>entailed</b> 29:17,19	<b>executive</b> 1:10	<b>extend</b> 185:2
183:24 184:5	105:1 107:22,23	<b>entered</b> 37:13	<b>exhibit</b> 82:19	<b>extensive</b> 28:11
195:7 199:22	111:13 148:15	74:10,13	206:16 214:8	<b>extent</b> 195:1
201:24 213:7	149:12 153:3,14	<b>entering</b> 42:25	216:8	<b>extra</b> 20:16 70:20
215:11	155:5,14 158:21	<b>entire</b> 9:4 91:22	<b>exhibits</b> 212:20	<b>eye</b> 151:23
<b>early</b> 14:13 17:14	159:1 170:3	<b>entirety</b> 76:5	<b>exist</b> 198:21	<b>eyes</b> 26:4 201:4
66:11 108:8	175:21 177:11,12	<b>entitled</b> 5:23	<b>existed</b> 82:8	
151:24	177:13 178:9	<b>entity</b> 43:18,22	<b>expectation</b> 65:10	<b>F</b>
<b>ears</b> 201:4	196:21,23 197:25	<b>entries</b> 74:18	<b>expectations</b> 16:3	<b>face</b> 15:16 58:10,11
<b>east</b> 9:25	199:23 220:13	<b>environment</b> 116:7	169:20 196:11,12	193:25
<b>easy</b> 115:17 116:11	<b>employees</b> 17:24	116:9	196:14,22 197:7,8	<b>facilitate</b> 189:13
<b>eat</b> 174:22	26:8 34:23 39:3	<b>equal</b> 107:25	197:17 198:3,7,8	<b>facilities</b> 16:12 28:9
<b>educated</b> 31:18	46:11 50:7 55:20	<b>eric</b> 28:19 101:6	198:14,21,24	39:16 40:11 129:4
<b>education</b> 7:25 40:1	55:20 59:23 76:14	<b>errata</b> 219:1	199:13,16	129:6
43:8 46:10 206:8	81:5,10,16 95:15	<b>escorted</b> 92:23	<b>expected</b> 26:3	<b>facility</b> 11:2 16:21
<b>educational</b> 51:3	95:16 97:16,19	<b>essentially</b> 65:17	169:15 170:13	17:7 18:8 19:8
<b>effect</b> 89:11 116:21	100:14 101:2,20	213:13	<b>expensive</b> 10:2	20:16,24 21:3
130:19,20 194:20	102:4 103:16,22	<b>estela</b> 192:14,15	<b>experience</b> 11:9	23:3,4,8,21,21
195:9				
<b>effective</b> 47:9				



24:22 25:10 26:13	176:22	47:3 66:22 85:13	12:1 13:1 22:25	<b>form</b> 16:8 25:14
26:20 27:8,16	<b>fairly</b> 215:7	109:23,24 111:21	26:2,11 28:19	32:8,17,20,21,22
28:2,2,6 34:13,19	<b>faith</b> 48:20	112:19,20 116:6	35:1 44:25 52:7	32:24 33:19 44:7
34:21 35:23 36:21	<b>fall</b> 68:12	123:1 139:24	61:16 65:3 70:9	49:6,23 58:5
39:19 42:13,16	<b>falsifying</b> 150:16	175:11,12 197:3	92:12 94:11 105:5	64:16 68:9 96:10
62:23 66:13 71:7	150:21	<b>female</b> 66:14	105:15 109:13	104:16,17 120:22
72:1,3 73:17 75:2	<b>familiar</b> 9:17 23:6	<b>ferrara</b> 192:10	115:9 130:10	158:22 160:7
89:19 98:5 108:10	66:12 95:21 149:5	193:4,21	143:17 154:11	161:12 177:12
108:16 111:14,15	<b>families</b> 139:22	<b>field</b> 7:22	162:22 164:9	185:13 196:16
111:21 112:23	<b>family</b> 8:13 55:20	<b>fifth</b> 2:3	168:21 169:5	198:19
114:16,18,20	152:12,13,15	<b>figure</b> 138:12	190:5,25 200:6	<b>formal</b> 46:12 50:3
117:7 119:2	<b>familys</b> 168:24	<b>file</b> 14:4 35:8,10	212:24 218:2	<b>formed</b> 117:25
120:11,18 122:14	<b>far</b> 5:11 35:18 38:4	59:17,23 60:4	<b>fiscal</b> 48:5,10,13	138:15
122:19,24 128:6	41:4 43:1,2 46:3	132:4 165:9	97:6 166:18,19	<b>former</b> 55:20 60:14
128:25 133:2	48:15 49:1,2,12	173:17 208:3,10	<b>five</b> 7:23 17:22 22:8	81:4 153:3,14
137:4 139:17	49:18,19 61:16	209:1,2	<b>fiveday</b> 87:4,12	<b>forth</b> 162:25 220:5
140:7,9,19 141:1	71:2 73:5,8 74:9	<b>filed</b> 7:12 57:19,23	<b>flailing</b> 176:12	<b>forward</b> 30:10
141:12,16 142:1	78:24 90:24 92:22	58:21 59:5,8	<b>floyd</b> 134:18	<b>forwarded</b> 32:3
143:2,5 145:10	98:21 100:2 104:8	60:11 143:25	<b>flying</b> 176:3	202:3
147:8,21 148:17	108:16 109:16	152:22 173:7,16	<b>fml</b> 206:1	<b>foster</b> 140:18,23
154:2,16 161:9	118:19 127:11	195:2 200:13	<b>focus</b> 148:14	<b>found</b> 20:8 66:21
162:9 163:1	134:11 137:8	201:16 202:6	160:13 212:7,8	163:24 164:15,24
164:11 168:12,18	139:6,10 157:11	203:4 207:3	216:14	191:6
173:10 184:18	160:15 163:3	<b>filing</b> 7:3 132:3	<b>follow</b> 76:17 77:18	<b>four</b> 7:10 8:12 9:9,9
185:4 191:16	168:8 172:23	200:24 202:21	122:11 131:22	17:22 22:8
200:7 204:10,13	176:7,13 177:9	<b>fill</b> 29:1 47:5 65:10	180:1 206:4	<b>fourth</b> 7:18
205:12 206:6	184:11,15,16	99:8,9 125:11,24	<b>followed</b> 128:24	<b>frame</b> 202:5
211:1,24 212:2	187:17 193:14	<b>filled</b> 92:6 124:13	139:7,12 142:12	<b>francine</b> 80:13
<b>facilityoriented</b>	194:15 203:4,7	<b>filling</b> 48:21	163:19,20 182:14	<b>frank</b> 149:3 179:12
204:6	212:11 216:4	<b>final</b> 47:19,20	<b>following</b> 28:13	181:18
<b>fact</b> 10:2 60:21	<b>farnworth</b> 149:3	<b>financially</b> 220:13	30:2 69:4 72:25	<b>frankly</b> 85:13
67:25 89:2,19	<b>farnworths</b> 55:7	<b>find</b> 62:1,3 71:2	94:5 97:2 138:22	<b>fraternizing</b> 81:11
99:5 106:15	<b>father</b> 7:1,10	88:16 92:16	139:2 166:12	81:17
129:17 139:21	<b>fausett</b> 177:16	103:19 104:16	178:10 181:19	<b>fraud</b> 151:10,17
178:7 197:17	<b>fax</b> 213:1	111:6 127:22	191:1,8 193:12	189:23 191:11
211:19	<b>fear</b> 201:4	141:20 150:16	<b>follows</b> 4:3	<b>freckleton</b> 97:22
<b>factor</b> 127:1	<b>feared</b> 148:16	166:2 169:17	<b>followup</b> 71:22	194:24 195:19
<b>facts</b> 37:4 57:22	<b>federal</b> 40:23 44:4	173:15 195:10	72:13	196:7 198:13
81:23 178:1	185:3,9,12	213:23	<b>force</b> 12:18 13:4,14	200:4,5
<b>failed</b> 172:16,18	<b>feedback</b> 138:24	<b>finding</b> 165:25	<b>fordham</b> 149:3	<b>free</b> 6:10 14:9
<b>failing</b> 206:4	<b>feel</b> 6:10 14:9 84:6	<b>fine</b> 23:2 96:16	201:22 207:18	<b>freestanding</b> 17:12
<b>fails</b> 215:5	86:4 131:4 140:1	144:12 199:1	<b>foregoing</b> 218:4	<b>freeze</b> 113:9,10,13
<b>failure</b> 122:11,11	172:7,9	215:22 217:6	220:3,10	125:8
<b>fair</b> 67:11 84:7 85:2	<b>felonies</b> 156:12	<b>finish</b> 36:13	<b>foremost</b> 26:2 35:1	<b>frequently</b> 111:24
88:6,13 107:17	157:6	<b>finished</b> 42:8,11	164:10	<b>friend</b> 7:1 142:6,9
116:3 119:12,23	<b>felony</b> 155:15	45:22	<b>forgery</b> 110:18	<b>friends</b> 55:19
121:12 123:25	156:15 157:3,7	<b>fired</b> 211:21	<b>forget</b> 84:18 178:14	<b>front</b> 61:8 67:16,19
146:4 167:10	<b>felt</b> 7:24 10:20 23:8	<b>first</b> 4:2 9:3 11:18	197:14	72:4 146:15 195:8

206:2 212:25	53:19 57:16 79:21	22:17,19 23:9	<b>gracie</b> 1:6 149:2	147:2
<b>fulfilled</b> 42:18	80:7 112:2 127:1	25:8 31:11 39:6	172:22 207:18	<b>hall</b> 20:25 21:1 72:9
<b>full</b> 190:11	135:22 155:22	39:19 50:17 52:21	<b>graduated</b> 8:23 9:5	72:15,24 174:13
<b>fullblown</b> 200:4	165:1 167:11	64:2,25 65:1 67:3	<b>grangeville</b> 23:13	<b>halls</b> 21:4,4
<b>fully</b> 164:17	187:18 202:19	67:4 72:7,8,8	23:14 211:3	<b>hand</b> 10:21,21
<b>functioning</b> 124:10	215:10,13,25	73:14 76:1 78:20	<b>granted</b> 7:14	166:6 175:4
<b>fund</b> 113:5	<b>given</b> 46:9 89:2	79:20 87:14,22	<b>grants</b> 40:23	220:15
<b>funded</b> 113:4	98:6 127:6 132:3	88:23 98:10 99:1	<b>graveyard</b> 186:8,10	<b>handle</b> 84:5 103:25
<b>funding</b> 40:23 44:2	139:3 181:22	99:2 100:16	195:9,19	146:22 173:18
130:20	183:20 196:21	108:11 109:4	<b>great</b> 69:2	205:25
<b>funny</b> 192:25	220:11	113:2 114:7 127:2	<b>greater</b> 107:25	<b>handled</b> 172:25
<b>furniture</b> 168:18	<b>gives</b> 182:23	131:13 133:15	<b>gregston</b> 1:4 102:18	173:1,3,14 174:2
<b>further</b> 12:5 114:14	<b>glen</b> 2:25	134:8 139:9	103:2,7 106:4,21	<b>hands</b> 20:14
116:21 220:12	<b>go</b> 6:18 7:19,21	146:22,23 147:2	110:21 111:1	<b>handson</b> 13:6
<b>G</b>	10:8,21 19:14,15	152:16 153:1	119:1,7 149:1,6	<b>happen</b> 42:18
<b>gained</b> 99:22	20:17,17,19,25	157:6 164:11,12	<b>grievance</b> 40:2	45:16 48:6 62:19
<b>game</b> 162:20 168:5	21:6 24:8 26:16	165:7 166:11,15	169:23 170:10	64:4 67:3 113:2
<b>gamestop</b> 167:25	29:25 31:6 37:8,9	166:17,21,23	173:8,16,17,18	157:9 164:21
168:3	37:24 38:1 39:13	169:10 173:18	175:4,20	182:21 205:14
<b>gaming</b> 168:5,6,14	40:3 44:8 47:12	176:9 177:22	<b>grievances</b> 116:22	<b>happened</b> 17:17
<b>garbled</b> 85:20	49:2,7,25 51:13	178:19 187:21	<b>grimm</b> 1:13,17 2:1	22:13 70:18 76:18
<b>gathered</b> 43:6,7	51:14 52:20,23	191:11 192:8,24	2:16 3:2,10 4:1	79:14 85:14 89:3
207:14	53:3,12 55:3 65:5	194:16 196:10	9:11 47:9 214:13	89:16 99:7,13
<b>gathering</b> 38:23	65:21 68:4 72:25	203:18,20 208:2	214:15 215:1,8	105:3 124:23
207:8	73:1,3,5 75:15	208:23 210:2,3	218:2,15 219:1	136:22 159:8
<b>geared</b> 100:6	78:25 80:23 81:7	212:20 217:9	<b>grounds</b> 76:8,10	171:22,25 174:7
<b>general</b> 10:1 22:3	82:20 83:15 86:20	<b>golf</b> 103:4 106:1	<b>group</b> 29:7,8,22	<b>happening</b> 89:1,24
151:10	88:11,22 89:24	<b>golfing</b> 105:14	30:1 31:7 46:21	90:7 128:22 157:8
<b>generally</b> 11:10	90:10,18 100:14	110:22	47:3 95:17,19,19	201:5
14:10 58:2 81:3	100:21 101:2,9,10	<b>good</b> 4:7 9:1 11:6	104:13 107:6	<b>happens</b> 73:25 74:4
102:2 143:23	104:3 108:24	27:6 66:20 100:6	149:5,14 181:10	<b>hard</b> 139:21
151:9,12 164:18	111:9 113:6 120:2	107:22 110:11	181:11	<b>harrigfeld</b> 1:11
209:18 213:12	128:12 137:6	115:11 121:6	<b>grow</b> 6:16	2:16,25 3:8 57:21
<b>gentleman</b> 10:24	141:22 148:5,19	140:2 153:11	<b>guess</b> 24:17 26:11	58:16 61:3 70:1
107:9 159:4	156:6 160:9 163:6	160:11 172:2,4	77:11 112:17	77:15 84:15,19,23
<b>geriatric</b> 11:11	167:25 169:17	175:18 188:1	144:13	85:3 102:24 109:2
<b>getgo</b> 139:23	173:21,24 174:16	<b>goodness</b> 12:24	<b>guide</b> 198:1	114:18 116:13
<b>getting</b> 26:5 112:20	174:18,21 177:22	<b>gosh</b> 134:19	<b>guideline</b> 127:24	131:6 160:5 205:5
130:25 131:5	178:21 180:8	<b>gossip</b> 209:19,22,23	<b>guidelines</b> 137:23	<b>harris</b> 153:17,18
133:4 138:24	182:7 185:6,14	209:24 210:1,1	<b>guilty</b> 89:11	154:6
154:1 158:5	189:5,7,9 194:17	<b>gossiping</b> 209:9,15	<b>gym</b> 72:8 174:8,8	<b>hasnt</b> 193:10 213:8
161:19 176:5	197:1,25 199:17	<b>gotten</b> 70:23 98:15	174:18,19	213:9
179:18 197:12	200:13 202:1	166:10 193:16	<b>gymeteria</b> 74:3	<b>hate</b> 189:18
<b>gifts</b> 167:13	211:4 213:5	195:7 207:24	<b>H</b>	<b>havent</b> 36:18
<b>gina</b> 52:7,8,11	<b>goes</b> 157:14	<b>governed</b> 68:7	<b>h</b> 3:5	120:25
<b>girl</b> 173:21 175:17	<b>goff</b> 2:25	<b>government</b> 44:4	<b>hadnt</b> 19:23	<b>head</b> 14:9 176:6
<b>give</b> 17:5 39:19	<b>going</b> 5:22,24 11:2	<b>governor</b> 22:17	<b>half</b> 9:9 92:3,3	177:3 216:23
	12:8 16:1 19:5	113:10		<b>headquarters</b> 17:2

28:15 192:1	179:24 181:20	<b>honest</b> 192:24	197:22 198:18	92:4 97:18 98:2,6
<b>health</b> 11:1,14	193:19 198:1	210:22 211:21	199:3 201:20	104:15 107:9
17:12,16 31:19,25	199:24 206:5	216:16	<b>hurt</b> 148:8 176:10	110:11 112:17
33:3,10,16 40:1	<b>helped</b> 107:13	<b>honestly</b> 24:7 93:17	176:12 177:11	114:7 120:17
68:16 92:10,16	193:9	168:9 188:22	<b>husband</b> 7:20 9:14	122:25 124:20,25
93:15 145:21	<b>helpful</b> 58:13	190:22	10:1 23:11 55:11	125:2,19 127:20
166:1 167:5	<b>helping</b> 85:17	<b>hook</b> 36:17	191:19 210:24	127:21 130:22
190:25,25	<b>heres</b> 82:15	<b>hoped</b> 203:20	<b>husbands</b> 9:22	138:6 141:17,18
<b>hear</b> 78:9,14,18	<b>hereto</b> 218:10	<b>horrific</b> 111:11	<b>hust</b> 79:4,5	150:22 153:4,4
101:18 111:11	<b>hernia</b> 191:1	<b>hospital</b> 4:14 8:2,2	<b>hypothetical</b> 89:21	154:10 156:8
120:12,13 130:24	<b>hes</b> 136:1 196:17,25	8:7,19 9:3,17	90:9,17	157:20 159:9
133:3,7 148:21	<b>high</b> 5:13,19 6:18	191:2		163:11 168:25
150:7,9 151:19	6:22,24,25 204:9	<b>hospitals</b> 9:18	<b>I</b>	176:9 177:8
171:2 190:2	204:12	<b>host</b> 162:20	<b>id</b> 108:9	179:18 180:2,6,25
191:12 192:16,23	<b>highest</b> 162:14	<b>hostility</b> 193:3	<b>idaho</b> 1:2,10,11 2:3	183:3 184:5
192:23 201:15	<b>highly</b> 38:17	<b>hour</b> 41:7 92:1,1,2	2:6,14,15,22 4:16	185:21 188:2
205:7 209:11,15	<b>hire</b> 47:19,19 95:9	92:3,3 128:20	10:5,5,10,11,12	189:11 192:24
209:19,21	<b>hired</b> 7:1 23:4 59:1	132:19 147:2	10:14 11:16 26:23	194:18 198:12,16
<b>heard</b> 5:25,25 6:2	94:12,13,20,22	<b>hours</b> 61:11,22	40:8 113:4 134:13	198:22 199:8
80:11,14 81:20	113:12 125:13,15	63:6 72:2 76:3	137:3,12 141:7	201:1 202:9,16
101:22,23 102:12	155:13 157:6	91:14 92:13	177:15 220:24	203:5 205:22
105:6,15 110:25	169:6	190:11 194:16	<b>idapa</b> 137:11,16,19	210:16 214:4,7
111:24 115:9,9	<b>hiring</b> 46:11,18	<b>house</b> 140:17 141:1	138:3	215:19 216:4,12
116:23 120:14	50:12 56:22 57:2	142:4 179:4	<b>identification</b>	216:21,25
123:14 133:6	94:5 96:22,25	<b>howington</b> 11:22	139:16,19,25	<b>image</b> 130:16
145:16,17,18	101:19,20,21	11:22	<b>identified</b> 10:25	<b>imagine</b> 39:6
146:2,4 151:18,21	102:10 105:10	<b>hr</b> 47:8,16 48:5,15	120:25	<b>immediately</b> 84:5
154:6,14,15	106:1,9,12,18,19	49:3 52:6 97:6	<b>identify</b> 200:18	157:4 173:1
162:22 190:1	108:22 109:3	99:10 114:24	215:6	174:20
192:20,20 208:2	110:10 113:9,10	138:20 177:15	<b>idjc</b> 1:11,12 30:7	<b>impact</b> 44:2 211:15
208:23,24,25	122:14 125:7	179:11 189:12	34:2 141:19,19	<b>imply</b> 5:19
209:10,12 211:9	137:24 169:2	193:8,13 197:25	215:3	<b>importance</b> 56:11
211:11	205:3,12	198:10,11 201:7	<b>idjcs</b> 50:4	67:2
<b>hearing</b> 116:15,17	<b>hispanic</b> 139:18	201:14	<b>ignore</b> 212:25	<b>important</b> 7:24
117:8 133:11	<b>hit</b> 111:9 131:20	<b>hub</b> 16:11,15,25	<b>ill</b> 16:18 82:14	36:13 175:8
171:18 204:18	194:7	<b>hull</b> 2:2,17	149:1 207:3	<b>imposed</b> 113:10
211:12 212:3	<b>hodge</b> 52:8,11	<b>human</b> 10:25 15:9	<b>illegally</b> 140:1	<b>impressed</b> 108:9
<b>heart</b> 12:7	<b>hold</b> 80:17 143:13	15:14 27:13 46:13	<b>im</b> 5:22,23,23 14:3	<b>impression</b> 120:8
<b>held</b> 9:8 24:23,25	<b>holdback</b> 124:3,5	46:25 48:10 51:14	15:10 16:12 19:5	<b>improper</b> 105:10
25:1 27:18 31:4	<b>hole</b> 35:3 36:6	51:24,25 52:3,8	19:5 22:21 26:24	122:14
35:22,24 45:1	<b>home</b> 8:13 23:12	52:10 62:16,17	31:1 32:6,11,11	<b>improve</b> 39:12
105:3 117:22	78:21,23,25,25	70:4,5 98:16,18	32:13 39:6,19	118:11 160:5
123:17,19 204:9	79:1 102:20	98:21 100:1	45:21 50:2,15	<b>improvement</b> 39:19
204:12	140:16,18 141:7	109:21 114:19	52:21 59:9,13,25	142:21
<b>help</b> 32:14 55:25	141:14,23,24	124:6,7 156:25	62:8 64:22 74:2	<b>improvements</b>
68:4 70:25 85:24	142:17,20 143:3	159:18 171:11	74:11,14,17,20	117:7
86:4,7 100:16	147:16 153:1	188:21,23 189:6,7	75:3,5 78:12,13	<b>improvised</b> 163:9
169:9 178:20	211:3	190:15,17 197:20	81:2 85:9 88:23	163:11

<b>inappropriate</b> 63:13,16 64:3 66:15 70:10 71:12 71:14 72:20 78:15 90:5 114:6 145:22 202:18,20 206:2	<b>indicate</b> 82:7 94:10 205:7	<b>interacting</b> 68:22 83:14 153:25	152:24 165:7 211:6	148:20 162:22 183:1 198:6 216:13,13,16
<b>inappropriately</b> 68:23	<b>indicated</b> 13:17 32:24 70:12 127:20	<b>interactions</b> 85:23	<b>investigators</b> 93:21	
<b>incarcerated</b> 79:24 133:18 168:20	<b>indicating</b> 205:11	<b>interested</b> 220:14	<b>invite</b> 64:1	<b>J</b>
<b>incident</b> 32:9,18,19 36:9,19,25 37:1,2 37:3,5,7,13,15,17 37:20,23,23 41:13 41:21 42:1 43:9 63:11 75:13 77:14 78:3 91:9,10,13 92:6,7,11,23 93:3 93:12,14 133:9 136:21 154:15 161:7,11 172:16 172:19,24 173:9 173:14 174:2,14 175:21 177:7,7,8 177:11,18,23,24 178:1,3,6	<b>individual</b> 1:4,4,5,5 1:6,6,7,11,13 157:24	<b>interfere</b> 5:17	<b>invited</b> 118:8,10 184:1	<b>j</b> 2:18
<b>incidents</b> 32:5 36:21,23 37:19 40:21 41:12,16,19 41:23 78:15 133:5 160:14 165:15 193:21	<b>individually</b> 157:12	<b>interim</b> 18:18 22:23	<b>inviting</b> 102:21	<b>jackie</b> 153:13
<b>include</b> 139:21 177:25	<b>infant</b> 175:15	<b>internal</b> 34:2,6 68:14 93:21 138:18 182:11,16 182:18,19 184:3,9	<b>involve</b> 95:15	<b>january</b> 186:7
<b>included</b> 13:1	<b>infatuated</b> 64:11	<b>internet</b> 168:11,14	<b>involved</b> 38:14 78:5 91:12 103:17 190:18 197:21 206:10	<b>jcc</b> 17:7 122:23
<b>including</b> 19:8 37:24 54:7 60:2,4 94:3 111:13 114:4 114:15 120:9 209:8	<b>infatuation</b> 63:19 64:8 68:5	<b>interpersonal</b> 104:6	<b>involvement</b> 78:16 190:15 213:8	<b>jcclawston</b> 16:22 23:1 93:22 115:21
<b>incomplete</b> 89:20 90:8,16	<b>influence</b> 155:24 156:1,3	<b>interrogatories</b> 53:22 54:7,16,23 212:24 213:16	<b>involving</b> 4:21 41:12,19 80:12 89:8 93:12 153:3 153:16 154:10,17 159:18 160:14 177:19 214:16	<b>jccnampa</b> 16:18,24 24:21 28:1 33:10 39:4 41:4 47:17 115:21 122:24 137:22 160:4 214:15 216:15
<b>increase</b> 160:15,17 160:23 161:6 178:25	<b>information</b> 33:10 43:6,7 50:25 51:2 73:25 101:11 202:3 207:8,12,15	<b>interrogatory</b> 54:11	<b>ir</b> 37:9,9 178:8	<b>jcst</b> 16:24 115:21
<b>increased</b> 161:23	<b>informed</b> 35:25	<b>interruptions</b> 203:22,24 204:2	<b>irps</b> 138:17	<b>jeff</b> 69:13
<b>indefinitely</b> 165:5,6	<b>initial</b> 50:21	<b>intervene</b> 26:4 85:7 90:7	<b>isnt</b> 154:20 167:10	<b>jeffries</b> 69:9 70:13
<b>independent</b> 53:2	<b>initially</b> 149:6	<b>interventions</b> 112:8	<b>isolated</b> 31:15 126:10 128:13	<b>jennifer</b> 154:16
	<b>initiated</b> 37:9 75:22	<b>interview</b> 10:12 11:4,4 15:6 22:22 24:9 35:12 45:7 46:22,22,24 47:1 47:21 48:16 50:14 99:15	<b>issue</b> 4:15 69:18 98:3 105:1 139:17 143:16,17 150:23 161:24,25 162:2 190:25 193:15 196:22 197:17	<b>jeopardize</b> 133:9
	<b>initiating</b> 37:3	<b>interviewed</b> 11:7 15:8 21:25 44:12 62:23 80:9 99:16 109:13	<b>issued</b> 185:11 197:6 198:3	<b>jeopardized</b> 134:1
	<b>injuries</b> 177:20	<b>interviewee</b> 47:2	<b>issues</b> 19:8,12 20:2 59:2 65:20 104:6 104:19 110:17 111:3 114:21 118:10 166:2 167:5 171:13 191:11 197:13,15 200:2 201:15 204:6 205:24 206:1	<b>jerry</b> 18:19,19,25
	<b>injury</b> 177:3,10	<b>interviewing</b> 11:1 47:15	<b>items</b> 163:8 164:14 164:23 165:8	<b>jo</b> 1:4 42:21,22 149:4 192:17,18 192:21 193:3,6,15 193:21 194:11,20 195:8,12,12
	<b>inman</b> 123:6	<b>interviews</b> 28:12 46:22 95:2 97:2 107:14	<b>ive</b> 6:11 30:15 35:22 76:2 119:8 127:18 142:16	<b>job</b> 8:13 24:20 25:5 25:7 26:22 28:2 29:2 51:17 80:3 93:8 95:21 96:3 100:3 107:6,10,18 108:6 142:20 158:8 169:17 195:6,10
	<b>input</b> 186:17,19	<b>investigate</b> 81:19 111:4 150:23 151:6		<b>johnson</b> 166:19 167:15
	<b>inside</b> 34:21 71:7 73:17 74:4 163:1 168:12	<b>investigated</b> 62:20 79:16 164:17		<b>join</b> 206:21
	<b>insofar</b> 34:21	<b>investigation</b> 62:9 66:17 73:15 76:10 79:16,18,19 92:15 93:18,20 152:23		<b>jorgensen</b> 28:22 29:9
	<b>instance</b> 127:6 159:8 182:24			<b>jsc</b> 31:7
	<b>instances</b> 101:1 172:15 183:21 184:6,18 185:18			<b>judgment</b> 119:24 127:4
	<b>institutionalized</b> 133:16			<b>judkins</b> 42:17 45:22 46:1 192:3 192:4
	<b>instruct</b> 34:12 52:21 55:15 199:9 199:11			
	<b>instructed</b> 198:17 199:4			
	<b>instruments</b> 54:7			
	<b>insurance</b> 4:15 7:2			
	<b>intent</b> 176:10			



<b>julian</b> 2:2,17	153:9 161:24	166:11,15,16,21	206:9	117:8,14 118:19
<b>julie</b> 3:7,10 52:2,9	163:5 164:22	166:22 167:3,4,5	<b>knoff</b> 121:23 122:9	118:20 120:24
56:6 57:18 59:7	165:19 175:23	167:5,7,23,24,25	122:10,15,20	121:11 122:8
60:19 61:10 65:3	176:15 177:9,19	168:18,20 215:10	123:16 124:10,15	124:17,19 125:4,7
65:4,7,8 70:6,17	177:24,24 178:1	<b>kevins</b> 168:23	125:23 129:9,14	130:13 132:15,25
76:2 77:16,20	214:14 215:2,6	<b>key</b> 21:9	131:7 134:10	134:11,13,14,17
83:2,13 91:9,13	<b>juvenileon juvenile</b>	<b>keys</b> 20:14	160:24 161:19	134:22 135:14
92:13 93:7 98:7	35:6 36:21	<b>kick</b> 176:8,11,23	169:2,7,10 178:16	136:16 137:6,7,8
100:1 101:11,12	<b>juveniles</b> 12:23	<b>kicked</b> 176:5	179:20 207:18	137:9,13,14,19,20
101:15 109:4,15	17:3 20:19 21:6	<b>kid</b> 70:24	<b>knoffs</b> 122:11	139:6 140:14
109:23,25 110:3	24:24 25:12 26:9	<b>kids</b> 20:17 68:4	178:18	144:20 148:23
121:25 153:25	29:8,25 30:4,5,5	70:21 74:2 112:19	<b>know</b> 5:2,24 7:5	153:10,11 154:18
154:19,25 155:8	31:8,13 32:4	115:18 116:11	11:9,25 14:9,15	155:3 156:8,23,23
165:13 181:18	34:20 35:12 41:13	126:5 128:17	14:17,19,20 16:4	157:8 160:16,18
186:24 188:11	41:20 42:2,6 60:2	131:3,16 141:19	16:7,10,10 17:17	160:21 161:1,6
196:3 197:5 198:2	60:5 62:24 68:8	144:21 154:7	18:24,25 20:1,13	162:10 165:24
198:9 199:16,22	68:23 73:16 78:16	161:21 174:8	21:17,20,24 22:2	168:14,23 170:19
200:3 205:7,17	81:4,11,12 116:9	186:13 212:9	22:4 24:2,5,18	170:25 171:15
207:12 208:16,19	126:14 130:2,24	216:16	26:22 29:23 33:24	172:12,23 176:2,7
209:8 210:12,12	131:5 133:4,9,18	<b>kim</b> 1:5 149:4	34:3,8,10 36:8	176:13,24 177:1,2
210:13	133:25 134:2	<b>kind</b> 5:21 7:6 10:20	38:4 39:13 40:17	177:3 178:2
<b>julies</b> 109:5	137:25 139:22	12:17 13:11 21:8	40:18,25 41:2,3,5	180:19,24 182:4,7
<b>july</b> 66:3 69:1	140:11 141:15	31:13,16 38:25	42:5 43:1,2,20	182:8 184:12,15
70:13,20 77:5	144:16 145:23	43:12 46:15 66:10	44:1,6,8 45:12,14	184:16 188:6,7
90:15 147:13	153:20,25 154:2,8	68:7 71:12,16	46:4,5 49:1,2,7,9	189:2,12,12
<b>june</b> 66:3 124:16	159:15 160:14	86:21 99:10	49:12,18,19 51:7	190:18 191:17,18
206:23 207:4	162:8,14 163:1	112:19 151:2	51:10,15,22,22	191:20 192:2,12
<b>justice</b> 40:6,15,16	164:11,22 165:16	152:9,21 159:5,11	52:11 53:16 57:10	192:19 193:19
40:22	168:11 190:22	160:3 163:3	59:14 60:7,13,20	195:12 196:10,17
<b>juvenile</b> 1:10,12	206:3,5	166:25 169:23	60:21 61:13,16,18	196:19,25 197:11
2:15 4:17 11:8		176:4 183:4 184:8	61:19 62:6,19,20	197:19,20,23
12:13 13:7,22,23	<b>K</b>	184:14 185:22	63:7,8 65:4,8 67:9	198:5,11,17,20
14:11 16:15 17:11	KS 173:16,24	187:9,15 188:13	73:6,8 74:9,15,18	199:22 200:2,8
21:6,23 22:18,20	174:25	195:2,11 196:12	74:21,23 75:22	201:14,18,19
26:23,25 27:9,19	<b>karen</b> 77:25	205:2 211:6 216:9	77:10 79:20 80:23	202:3,18 203:4,7
28:3 30:2,4,5,10	<b>karin</b> 62:13 70:7	216:19	81:8,18 82:10,12	203:12,24 204:2,7
30:12,25 31:4,12	<b>keep</b> 35:25 151:23	<b>kindergarten</b> 8:5	82:16,21 87:9,11	205:25 206:7,9,17
32:12 33:25 35:7	175:13 179:18	<b>kinds</b> 39:24	88:2 89:6,15	207:17,20,22
35:9 40:5,8,11,15	190:22 201:3	<b>kl</b> 215:3	91:12 92:10,19,22	208:22,24 209:13
43:5,19,23 68:12	217:4	<b>knew</b> 19:6 32:19	95:3 96:14,15	209:17 210:4,7,12
69:6 70:14 78:7	<b>keeping</b> 209:6	58:11 87:14	97:16,19,23,24	210:13 211:8,20
79:4,23 81:15	<b>keeps</b> 177:16	108:11 118:4	98:21,22 99:18,21	212:12,13 213:5
82:8 83:14 113:17	208:17	142:14,16 161:11	99:24 100:2,8	214:22 216:12,16
127:2 129:3	<b>kept</b> 12:10 164:23	166:20,22,22,23	101:14,17 103:5	218:6
131:23,23 132:2,7	164:24 165:2,5,9	169:9 174:2,4	104:8 106:18	<b>knowledge</b> 41:12
132:20,23 133:1	203:6,8,9	175:14,14 187:17	108:20 110:25	44:5 107:22
137:12 140:19	<b>kevin</b> 23:23 165:19	199:21 200:9	113:12,19,24	122:22 193:17
141:20 152:9	165:20 166:1,1,7	<b>knijf</b> 149:3 205:24	114:23,25 116:1	<b>known</b> 90:3

<b>knows</b> 205:17	200:25 201:2,17	<b>legal</b> 27:12,15,19	<b>list</b> 117:1,2,3,4,5,6	157:12 160:22
	202:6,22 203:4	31:11,23 46:8	117:9,18,20,21	161:1 164:5 190:4
<b>L</b>	206:21,25 208:4	47:16 49:24 80:16	118:8 149:1 163:8	190:5 202:16
<b>l</b> 165:20	208:10 211:15,22	80:18,22 81:21	<b>listed</b> 218:9	212:19 213:4,5
<b>lack</b> 19:7 31:9	211:23 212:2,8	89:22 90:9 127:12	<b>listen</b> 131:16	214:2,3,23,24
<b>ladies</b> 78:21	213:14	133:15 137:5,18	<b>lists</b> 205:8	215:15
<b>lady</b> 79:21 166:10	<b>lawsuits</b> 59:17,23	138:20 146:14,21	<b>litigation</b> 57:6,9,22	<b>looked</b> 39:10 124:9
173:7 174:10,13	60:4	146:21 159:10	58:18,21,25 59:8	129:23 138:9
174:13,18,21	<b>lawyer</b> 180:6	173:16 179:11	<b>little</b> 6:13 61:10	160:24 210:14
175:3,10,11	<b>lawyers</b> 135:25	182:6 185:5 201:7	175:14 177:5	211:9 213:9 216:8
192:22 193:1	<b>lay</b> 124:4	201:14	195:3	<b>looking</b> 47:4 50:2
<b>ladys</b> 193:22	<b>lead</b> 14:1,1,22	<b>legislators</b> 113:5,7	<b>littlefield</b> 149:2	66:22 83:4 85:17
<b>lake</b> 9:18,21	<b>leader</b> 29:7,8 31:7	<b>legislature</b> 40:4	204:15,19,23	85:24 99:3 145:21
<b>lamark</b> 42:17 192:3	95:17	<b>legs</b> 176:3	<b>live</b> 80:21 81:5	189:22 202:13
192:4,5,6,7	<b>leaders</b> 95:19,19	<b>lengthier</b> 87:18	<b>living</b> 7:20 80:14	207:25
<b>large</b> 155:4	<b>learn</b> 65:16 78:10	<b>letter</b> 10:13	175:5	<b>looks</b> 83:2
<b>largely</b> 143:6	78:14 158:2,25	<b>letters</b> 155:2,8	<b>llp</b> 2:17	<b>lose</b> 158:13
<b>larry</b> 15:13 18:15	164:20	<b>letting</b> 155:3	<b>local</b> 35:10,11 42:3	<b>losing</b> 110:9 121:4
18:17,20 22:18	<b>learned</b> 8:1 75:12	<b>level</b> 47:6,8 64:21	93:15	<b>lost</b> 66:20
<b>larson</b> 79:2 80:13	80:11	128:5 140:15	<b>locally</b> 166:2	<b>lot</b> 13:2 23:3 40:2
81:20 82:1 93:13	<b>leave</b> 11:5 19:9,10	142:1 162:15	<b>lock</b> 21:9	43:9 56:4 67:1
152:9	19:23 20:9 66:16	163:4	<b>lockdown</b> 130:2	72:4 103:2,5
<b>lascivious</b> 62:2	79:15 86:24 87:16	<b>lewd</b> 62:2 143:20	133:5 162:5	131:2,13 135:10
<b>late</b> 14:13 147:13	121:16 127:18	214:16	<b>locked</b> 20:23	155:7,8 171:25
151:24 192:8	128:19 172:5	<b>lewiston</b> 18:5 23:3	127:18 131:16	172:2 176:3
<b>laura</b> 42:17,19	179:24 180:10	23:6,13,21 122:23	164:18 165:2,9	191:18 193:17,18
44:10,12 59:3	190:13,24 192:7	140:17 141:7	<b>locker</b> 164:24	194:17 197:9
72:19 95:18 97:3	<b>leaves</b> 20:14	143:2,3,5 154:16	<b>locking</b> 128:18	201:24
98:9 109:6,8,24	<b>leaving</b> 151:24	<b>license</b> 8:25 12:10	<b>locks</b> 20:11	<b>louis</b> 165:20
125:13,18 126:7	<b>led</b> 30:8 71:10	12:14 51:19	<b>log</b> 74:5,16	<b>loved</b> 10:6 113:1
169:12,15 171:4,6	<b>ledford</b> 1:4 2:24	158:13	<b>logs</b> 74:12,22	<b>lukes</b> 10:10,10,16
172:13 173:21,22	3:11 149:2 197:7	<b>licenses</b> 11:24	<b>long</b> 6:11 8:11	<b>lumped</b> 167:19
173:23 174:3	197:10,14,18	12:14	10:23 13:20 17:19	<b>luncheon</b> 91:6
178:15 179:3,6,8	198:4,9,15 199:14	<b>lied</b> 66:18	38:10,10 45:19	<b>lying</b> 105:18,22
179:19,22 180:9	200:1,5,14 201:21	<b>lietau</b> 153:4,9	65:22 67:23 82:4	106:6
180:10 181:21	202:2 203:19	<b>life</b> 7:2 12:3,7	91:24 101:4	
204:17	207:8,24 208:1,7	<b>lifethreatening</b>	107:21 108:6,7	<b>M</b>
<b>lauras</b> 174:12	208:17	12:4	132:15,18 134:23	<b>m</b> 2:4 91:6 147:5
<b>law</b> 2:11 5:9 28:3	<b>ledfords</b> 55:7	<b>lighthearted</b> 5:20	135:12 190:23	189:21 216:5
31:24 35:8,10,11	203:18	<b>liked</b> 161:20,21	<b>longer</b> 7:11 66:22	217:13
46:10 68:16 81:10	<b>left</b> 7:12 18:17 19:7	<b>limbo</b> 99:9	126:25 216:14	<b>magnelli</b> 62:13,25
128:1 132:4	28:19 46:4,6 52:2	<b>limited</b> 149:20	<b>longlasting</b> 176:23	70:7 77:25
182:17 185:3,9,12	91:8 121:10,11,12	<b>line</b> 219:2,4,7,9,12	<b>look</b> 10:4 30:16	<b>maiden</b> 11:18
<b>laws</b> 138:4	121:16 149:9	219:14,17,19,22	39:9,12,12 73:2,2	<b>main</b> 2:13 45:16
<b>lawsuit</b> 57:19,23	172:6 178:15	<b>lines</b> 87:24 181:6	73:3 81:23 82:20	<b>maintained</b> 38:4
59:5 134:17,25	180:23 210:25	<b>lisa</b> 149:2 154:13	100:15 128:4,4,5	<b>maintenance</b> 35:3
135:2,6 136:15	211:5	154:14 177:15,16	133:12 137:23	102:21 115:10
192:19 200:10,12	<b>leg</b> 191:5	204:15	141:20 150:12	<b>majority</b> 17:3

72:10	<b>maria</b> 192:10	63:5,20 67:24	101:22 102:6	<b>minute</b> 135:24
<b>making</b> 51:20	193:21	74:15 77:2 87:4	106:23 110:5,20	<b>minutes</b> 114:21,23
56:11 76:9 94:23	<b>mark</b> 82:15,16	91:16 109:15	111:12 114:13,17	117:22 167:3
95:9 141:17	97:22 194:24	154:19 165:13	115:11 116:12,24	216:2
170:15 182:13	195:3,5 196:9	188:11 196:3	117:12 118:8,9,13	<b>misbehaved</b> 131:17
195:11 200:21	198:13 199:21,24	<b>mckinney</b> 1:4 42:21	119:1,4 120:7	131:18
205:20	200:1,4,5,9	42:22 149:4	121:8,21 122:7	<b>misconduct</b> 60:14
<b>male</b> 63:23 66:7	206:15 212:20	192:18,21 193:6	123:4 128:18	62:7
68:23 83:14	<b>marked</b> 82:19	193:21 194:11,20	142:13 143:7,17	<b>misdeemeanor</b>
<b>males</b> 71:6	206:16	195:8,12,13	144:10,18 146:5	154:23 156:2,18
<b>malfunction</b> 21:8	<b>marriage</b> 7:10	<b>mckinneys</b> 192:17	147:6,22 148:12	157:3,11,22 158:1
<b>malfunctioned</b>	<b>married</b> 7:7,11	<b>mclaine</b> 154:10	148:15 150:14	158:21 159:1
20:11	9:11,13 11:20	<b>mcnally</b> 175:22	159:20 169:14,25	<b>misdeemeanors</b>
<b>man</b> 60:8 66:13	<b>martial</b> 13:10	<b>mean</b> 5:19 13:9	<b>meetings</b> 29:22	155:1,16 156:12
68:1 69:3 70:23	<b>marylou</b> 69:9 70:13	16:15 17:1 25:22	114:22 115:2,4	<b>misheard</b> 141:5
76:14 80:12 93:23	<b>matter</b> 2:7 33:5	25:25 26:1 27:10	117:22 118:6	<b>missed</b> 173:22
93:25 174:19,20	50:23 54:21 58:11	29:15 38:1 50:5	159:18,23	<b>missing</b> 82:18
176:1	61:5 62:20 104:16	58:8 59:18 64:17	<b>member</b> 61:13 78:4	173:15
<b>managed</b> 120:18,21	148:24 164:3	70:15 71:23,24	131:24	<b>misstates</b> 19:13
<b>management</b> 12:22	178:5 212:25	76:19 78:23 112:7	<b>memory</b> 216:9,11	88:8,9 106:16
29:22 65:19 119:2	<b>matters</b> 194:10	129:18,23 131:19	<b>men</b> 7:24	148:4 181:12
119:19 150:14	<b>maury</b> 4:13 8:2,7	154:3 155:8	<b>mental</b> 166:1 167:5	<b>modify</b> 216:23
209:1	9:2,8	161:18 163:23	<b>mentioned</b> 36:3	<b>molested</b> 32:12
<b>manager</b> 9:6,7	<b>mccormick</b> 1:5	173:25 181:4,8	51:12 108:2 110:7	<b>moment</b> 82:16
12:25 13:12 14:4	59:7 60:19,22	200:19 201:8,18	113:16 135:18	154:11
15:21,22 16:2,23	61:21 62:7 63:13	202:24 212:4	136:10 143:8	<b>moments</b> 167:4
17:19,23 18:2,13	63:20 65:3,7,16	216:17	144:22 159:17	<b>monday</b> 102:24
29:11,12 37:11	65:18 66:2,6,11	<b>means</b> 197:3	183:5	103:8
38:9,12 43:6	67:1,7,8 69:2,23	<b>meant</b> 12:3,7 20:12	<b>mentoring</b> 126:4	<b>money</b> 149:18
45:24 94:16,19	70:25 71:6,12	40:10 115:14	<b>met</b> 23:18 31:16	166:7,16,17,23
95:6,10,14,23	72:11,23 75:8,16	126:10 172:3	51:17 98:7 102:24	167:7,8,9,17,18
97:23 98:9 108:24	75:19 83:24 84:8	187:13	114:19 142:17	167:19,20 215:25
108:24 123:23,25	84:24 85:8,16,22	<b>measured</b> 39:24	169:25 181:17	<b>monitor</b> 83:13,17
124:9,11,13,23	89:5,8 90:2 91:9	126:21	196:9	84:11
125:2,16,18	91:14,19 93:8	<b>measuring</b> 127:22	<b>middle</b> 72:15	<b>monitored</b> 201:16
126:13 142:18,21	99:25 100:24,25	<b>mechanism</b> 32:16	<b>miles</b> 91:12,15,17	201:18 202:11,12
169:7 178:10	101:8,12 106:10	<b>med</b> 115:9,15	158:3,5 159:3	203:13
179:19 180:14,17	106:13,19 107:11	117:16	<b>milestone</b> 23:7	<b>monitoring</b> 84:8
180:21 181:6,14	107:20 108:10	<b>medical</b> 7:22 9:20	<b>miller</b> 134:18	200:13,19,20
<b>managing</b> 137:21	109:1,4,23,25	43:8 177:1 216:10	<b>mind</b> 118:9 120:24	202:22
<b>mandated</b> 34:9	121:25 135:23	216:19	139:14	<b>month</b> 9:12
<b>mandates</b> 113:17	136:6 149:4	<b>medications</b> 5:16	<b>mine</b> 61:8 129:22	<b>monthly</b> 138:21
170:2	153:25 154:21	<b>medicine</b> 143:21	134:5,8	<b>months</b> 7:7 10:24
<b>mandatory</b> 34:13	186:24 195:4	<b>meet</b> 56:13 100:3	<b>minimum</b> 51:16,17	17:15 66:3
185:22	197:5 198:2,9	111:11 124:5	<b>minor</b> 82:12 92:11	<b>monty</b> 131:6
<b>manners</b> 11:6	199:16 205:7,17	126:12 171:6	154:17	<b>moore</b> 2:19
<b>mans</b> 66:16	205:19 210:12	173:24	<b>minors</b> 143:21	<b>moraine</b> 9:24 10:8
<b>marcy</b> 153:16,18	<b>mccormicks</b> 61:10	<b>meeting</b> 30:3,9	145:25 214:16	<b>morales</b> 193:9

<b>morning</b> 4:7 102:25 142:13 143:9 146:14 166:21	117:24 131:6 139:17 140:17,19 141:1,2,3,8 142:1 144:6 148:16 190:23	44:18 101:10 108:8 110:2 113:7 130:5 131:12 139:3,4 163:7 183:6 199:20 203:19	14:1,1,2,4,22,23 15:20,22 16:2,23 17:19,23 18:2,13 33:7 38:9,12 142:18,21	199:1,5 200:16 215:8 <b>objections</b> 199:1 212:21 220:7 <b>objectives</b> 126:11 <b>objects</b> 163:17 <b>obligated</b> 8:18 31:25 32:13 33:8 <b>observation</b> 66:14 111:25 129:6 <b>observing</b> 83:13 84:8		
<b>morrisonknudsen</b> 9:12,13,24	<b>nancy</b> 2:24 70:7 143:11,14 181:18	<b>news</b> 89:12 <b>night</b> 20:16 58:12 76:3,15 187:22 207:25 208:9	<b>nurses</b> 23:5,5 <b>nursing</b> 8:3,8,16,22 11:1 14:2 18:2,5 143:9 144:22	<b>obligated</b> 8:18 31:25 32:13 33:8 <b>observation</b> 66:14 111:25 129:6 <b>observing</b> 83:13 84:8		
<b>mother</b> 152:20	<b>nancys</b> 143:12	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>motors</b> 10:1	<b>national</b> 7:1,17 38:17 128:5 129:18	<b>night</b> 20:16 58:12 76:3,15 187:22 207:25 208:9	<b>o</b> 2:21 30:4,13 94:12,13,14,17 101:24 102:2 110:6 111:10 114:8,10 120:9 121:10,23 122:2,4 123:3,23 125:19 125:20,21 126:8 126:15 127:9 128:15 129:2,3,10 129:25 130:1,14 131:3,8,14 148:22 169:8,12 172:1,24 173:3 174:15 178:19 179:4,23 180:8 181:20,21 183:20 204:15 220:23 <b>oath</b> 19:5 220:6 <b>object</b> 16:8 19:13 25:14 44:7 49:6 49:23 58:5 68:9 81:6 96:10 120:22 158:22 160:7 185:13 196:16 198:19 215:4 <b>objecting</b> 102:22 <b>objection</b> 26:15 53:11 55:14 80:22 88:8,17 89:20 90:8,16 106:11 119:25 137:5,17 144:11 148:4,18 160:19 164:7 173:2,6 181:12 182:6 184:24 185:5 196:24	<b>national</b> 7:1,17 38:17 128:5 129:18	<b>news</b> 89:12 <b>night</b> 20:16 58:12 76:3,15 187:22 207:25 208:9	<b>o</b> 2:21 30:4,13 94:12,13,14,17 101:24 102:2 110:6 111:10 114:8,10 120:9 121:10,23 122:2,4 123:3,23 125:19 125:20,21 126:8 126:15 127:9 128:15 129:2,3,10 129:25 130:1,14 131:3,8,14 148:22 169:8,12 172:1,24 173:3 174:15 178:19 179:4,23 180:8 181:20,21 183:20 204:15 220:23 <b>oath</b> 19:5 220:6 <b>object</b> 16:8 19:13 25:14 44:7 49:6 49:23 58:5 68:9 81:6 96:10 120:22 158:22 160:7 185:13 196:16 198:19 215:4 <b>objecting</b> 102:22 <b>objection</b> 26:15 53:11 55:14 80:22 88:8,17 89:20 90:8,16 106:11 119:25 137:5,17 144:11 148:4,18 160:19 164:7 173:2,6 181:12 182:6 184:24 185:5 196:24
<b>move</b> 11:16 151:22 152:2 179:8 181:4 181:15,16,20 183:19	<b>nancy</b> 2:24 70:7 143:11,14 181:18	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>moved</b> 7:3 94:13 125:21 169:8 178:15 180:9 182:25 208:2	<b>nancys</b> 143:12	<b>night</b> 20:16 58:12 76:3,15 187:22 207:25 208:9	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>movement</b> 74:5,12 74:16 183:6	<b>national</b> 7:1,17 38:17 128:5 129:18	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>movements</b> 73:16 74:15	<b>nationally</b> 39:1	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>moving</b> 22:17 74:2 180:10 181:6 187:2 207:25	<b>national</b> 7:1,17 38:17 128:5 129:18	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>N</b>	<b>nature</b> 54:12,24 93:19 152:25 153:7,20	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>n</b> 2:9 3:1	<b>nature</b> 54:12,24 93:19 152:25 153:7,20	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>nailed</b> 144:2	<b>nay</b> 163:7	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>name</b> 4:8 11:18 13:7 15:17 18:19 48:1 56:3 60:8 69:7,7 93:23 110:13 112:3 118:3,4 154:11 165:19 166:5 175:22 176:16,18 193:22,25 218:21	<b>near</b> 194:20 195:15	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>named</b> 149:21 218:4	<b>necessarily</b> 95:12 195:14	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>names</b> 71:21 149:4	<b>necessary</b> 129:11 129:12 164:20 197:3	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
<b>nampa</b> 1:12 3:9 11:3 16:11,14,16 16:25 18:3,8,11 18:16 22:23 23:18 23:21,22 24:1 29:11 30:13 35:13 35:17,18 48:4 60:25 66:13,20 67:17,20 68:3 76:20 114:18,19	<b>needed</b> 35:25 56:13 61:4 69:4 70:15 76:17 81:22 84:5 98:13 109:8 114:8 115:18 121:5 126:25 132:21 138:2,9 178:19 180:8 212:9	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,24 165:2,13,17 174:1 175:2 192:17 193:5,18 203:18 <b>officer</b> 10:25 15:10 15:14 30:5 33:5 52:8,10 65:6,21		
	<b>needs</b> 30:9 31:16 141:20	<b>nights</b> 159:5 186:13 187:2	<b>O</b>	<b>obtained</b> 8:24 <b>obviously</b> 119:8 <b>occasions</b> 23:19 203:16 <b>occur</b> 34:19 <b>occurred</b> 37:1,8 77:6 89:4,14,19 120:7 152:25 <b>occurs</b> 182:22 <b>offcamera</b> 71:6 <b>offender</b> 167:2 <b>offense</b> 158:4,21 <b>offenses</b> 41:20 <b>offer</b> 5:12 10:7 47:9 47:13,24 48:1,8 129:10,14 157:25 <b>offered</b> 4:20 9:19 10:16 136:24 174:16 <b>offering</b> 8:3,15 11:12 46:21 214:8 <b>office</b> 2:11 40:15 61:7,10,21 63:5 75:16,19,24 76:3 76:15 77:3 78:1 79:18 83:13,15 91:16 92:14 102:25 141:16 151:22,25 152:1,1 152:2 164:18,2		



78:19 100:1 107:12 108:5 109:17,21 124:6 152:18,19,20 154:20 158:9,11 177:15 189:4,5 193:9 194:25 197:6 <b>officers</b> 168:1 185:23 186:6 187:17 200:15 205:9 <b>offices</b> 84:13 <b>official</b> 1:12,13 <b>offsite</b> 165:23 <b>oh</b> 27:25 36:11 101:4,6 134:19 139:8 <b>ohio</b> 9:24 10:8 <b>okay</b> 6:4 13:24 18:23 20:22 24:19 32:13 35:2 36:15 39:3 47:11 68:2 80:19 82:23 92:5 92:15 109:19 114:2 127:1,16 128:12,13 134:7 156:23 161:9 166:17 169:6,7 172:25 175:19 179:6 183:18 189:1,17 190:10 194:7 206:11 213:22 216:25 <b>okinawan</b> 13:9 <b>old</b> 82:10 192:22 193:1 <b>older</b> 11:11 <b>oldest</b> 7:22 <b>once</b> 8:14 33:12 39:16 74:10 81:15 90:12 126:24 167:23 180:7 215:12 <b>oneal</b> 207:20,22 208:6 <b>ones</b> 105:25 113:5 118:20	<b>open</b> 11:2 15:1 24:5 45:10 47:17 48:23 48:25 72:5 201:4 217:4 <b>opened</b> 16:4 22:2 <b>openings</b> 10:15 <b>operating</b> 27:15 <b>operation</b> 139:11 <b>opinion</b> 89:23,25 90:1,10,12,18,25 112:22,24 120:1,1 120:4 122:24 133:13 161:12 <b>opportunity</b> 75:17 175:6 <b>opposed</b> 120:18 169:2 174:5 <b>option</b> 23:2 35:7,10 132:3 158:20 181:9 <b>options</b> 30:16 <b>order</b> 151:23 154:25 156:22 157:12 <b>ordered</b> 128:20 <b>ordinary</b> 204:6 216:9 <b>organizational</b> 181:3 <b>original</b> 18:16 82:17 <b>orthopedic</b> 9:4,8 <b>orthopedics</b> 10:20 11:10 <b>ought</b> 112:23 <b>outcome</b> 134:14 135:2 136:15 147:22 <b>outing</b> 166:22 <b>outset</b> 36:12 <b>outside</b> 53:12 72:3 91:18 114:10 154:2 168:18 174:16 194:12 <b>overdue</b> 199:23 <b>overnight</b> 147:15 <b>oversaw</b> 9:14 <b>oversee</b> 10:8 122:12	<b>oversees</b> 40:5 <b>oversight</b> 18:5 29:13 <b>overtime</b> 197:14 210:15 <hr/> <b>P</b> <hr/> <b>p</b> 2:9,9,21 91:6 147:5 189:21 216:5 217:13 220:23 <b>padding</b> 110:18 150:4,10 <b>page</b> 3:2,6 83:4 87:25 219:2,4,7,9 219:12,14,17,19 219:22 <b>pager</b> 20:14 <b>pages</b> 218:5 <b>paid</b> 101:2 168:23 191:14 <b>panel</b> 11:7 24:11 46:23 47:1,21 50:14 <b>paper</b> 74:6 164:5 <b>paragraph</b> 83:5,7 <b>parents</b> 30:4 <b>parking</b> 72:4 135:10 194:17 <b>part</b> 16:21 17:12 23:3 26:7 29:20 38:18 51:7 58:25 63:12,12 86:25 94:23 139:23 142:20 170:10 173:2 189:15 <b>participants</b> 47:21 <b>participate</b> 54:14 <b>particular</b> 12:21 25:10 55:12 65:12 68:6 69:3 72:17 73:13 101:7 107:7 114:25 115:6 137:22 174:10 178:2 196:13,23 205:23 209:3 <b>particularized</b> 197:7	<b>particularly</b> 63:23 162:10 <b>parties</b> 54:6 <b>parts</b> 21:3 <b>parttime</b> 177:5 <b>party</b> 6:1 53:10 56:14 105:2 220:13 <b>passed</b> 8:6,24 97:25 110:11 <b>passes</b> 78:25 <b>passing</b> 121:6 <b>pat</b> 59:12,13 61:7 61:11 70:6 77:22 83:17 115:1 116:13 117:22 <b>patrol</b> 140:2 <b>pay</b> 47:10 48:13 65:1 66:17 79:16 86:24 100:10,13 151:2 178:25 <b>payne</b> 175:22 176:20 <b>paynes</b> 177:10 <b>pays</b> 100:18 <b>pbs</b> 32:9 37:12,13 38:7,8,15,22 39:14,15 40:3,9 40:14 42:8,9,12 42:16 43:1,3,10 43:16,19,23 44:1 44:11,14 45:5,25 128:2,8 129:1 130:16 192:4 <b>pd</b> 35:17,18 67:17 67:20 <b>pe</b> 174:8,16,17 <b>peers</b> 63:19 139:20 <b>pending</b> 66:17 <b>penrod</b> 1:5 2:25 149:2 186:7,7,14 188:18 194:21 195:9,13 <b>penrods</b> 194:23 <b>people</b> 11:7,11 27:12,13,19 30:2 39:4 46:2 47:3 48:8 49:16 61:3	66:22 71:21 72:12 95:1 102:21 103:3 103:4 105:13 107:13 109:22 110:11,11,13 120:24 121:6,15 121:18 129:9,22 133:18 139:18,24 142:12 149:8 150:10 159:10 169:10 174:15 189:12 206:10 210:2,5 212:5,6 <b>peoples</b> 84:13 <b>perception</b> 212:14 <b>performance</b> 19:7 19:7,11 20:2 100:17 197:14 <b>performancebased</b> 38:16 127:13,25 <b>period</b> 67:18 132:24 139:3 148:14 <b>perks</b> 162:15 <b>permanent</b> 74:8 <b>permission</b> 47:5,13 47:14,16 111:9 195:23 <b>perpetrator</b> 174:23 <b>person</b> 32:1 33:12 33:15 37:1,2,14 37:14,22 46:20 48:1 51:5,6 61:17 63:1 102:16 113:19 155:6,13 173:17 179:23 196:9 <b>personal</b> 120:16,19 170:20 194:9 <b>personally</b> 215:2 <b>personnel</b> 14:4 65:20 134:13 135:12 <b>persons</b> 133:17 <b>peterson</b> 135:5,10 135:19 136:8,15 <b>petition</b> 102:9,13 102:22 103:17,20
---	---	--	--	---

103:23 104:13,22	150:4 201:11,16	182:19 183:25	183:6 204:25	<b>preparing</b> 52:16
<b>petitions</b> 116:14,22	202:23 203:3,7,17	184:8,9,19	<b>positions</b> 10:17	54:15,19 104:13
<b>petty</b> 167:8	212:5,11,22,24	<b>policy</b> 33:21,22	11:2 48:25 49:4,9	<b>prerequisites</b> 8:14
<b>ph</b> 211:20	213:1,14,25	34:2,6 46:10 68:6	49:17,21 50:20	<b>prescribed</b> 191:10
<b>phased</b> 124:1	<b>plan</b> 16:20 23:12	68:12,14 73:23	65:19 108:15,19	<b>prescription</b> 5:16
<b>phil</b> 215:18	39:19 86:21,23	79:7,9 80:21 81:4	109:3 110:15	<b>preselected</b> 50:16
<b>philip</b> 149:6	197:24	81:9,16 103:23	113:6,7 124:4	<b>presence</b> 194:20
<b>phillip</b> 2:18	<b>planned</b> 19:24	104:12 138:18,23	205:3,8	<b>present</b> 2:24 103:14
<b>phone</b> 11:11 19:22	210:24	138:25 139:5,7,8	<b>possibility</b> 203:21	115:2,4 116:12,21
20:5,6,7 58:10	<b>planning</b> 23:4	139:15 153:1	<b>possible</b> 26:5	<b>presented</b> 104:17
78:19 102:20	70:23 75:15	155:12 162:2,3,25	145:22 201:4	157:15
206:21	<b>plant</b> 9:14,23,23,25	163:19,19 164:3,3	<b>possibly</b> 85:14	<b>presume</b> 34:5 157:3
<b>phoning</b> 78:20	10:9	164:15 167:10,21	203:22	<b>pretty</b> 35:17 85:20
<b>physical</b> 13:6 112:8	<b>playing</b> 103:4	170:2 182:4,10	<b>post</b> 12:21 13:3	111:11 157:1
161:22	126:4	183:8,16,22 184:3	65:9 155:1,3,9	<b>prevent</b> 26:5 85:14
<b>physician</b> 8:15	<b>plaza</b> 2:19	184:7 188:3 194:9	157:13,17,23	88:25 90:7 134:9
<b>physicians</b> 12:4	<b>pleadings</b> 53:7	196:13 215:3	194:14	<b>prevention</b> 40:16
<b>pick</b> 206:5	<b>please</b> 19:23 28:23	<b>pops</b> 14:9	<b>posted</b> 45:10 48:25	<b>prevents</b> 104:12
<b>piece</b> 68:5	62:19 83:6 85:19	<b>population</b> 133:8	49:5,10,13,18,22	155:12
<b>pin</b> 140:6,15,15	111:17 115:7	<b>portal</b> 37:13	179:16	<b>previous</b> 81:12
140:17,19 141:25	186:1 198:25	<b>portholes</b> 21:2	<b>potential</b> 133:22	96:18 151:16
141:25 142:6,14	214:4,4,12,13,24	<b>portion</b> 66:7	<b>power</b> 161:20	156:5 157:5
142:14,24 143:10	214:24 215:1	<b>pose</b> 155:20 158:10	<b>practice</b> 100:9,12	<b>previously</b> 79:24
143:17 144:6,21	<b>pled</b> 89:11	<b>posed</b> 213:14	139:12 143:4	123:22
145:9 147:7,7,16	<b>plenty</b> 193:20	215:17	164:6 188:4	<b>principal</b> 206:13,13
147:20 214:14,17	<b>pllc</b> 2:11	<b>position</b> 9:7,8,19,20	196:13	<b>prior</b> 42:19 50:13
<b>pizza</b> 128:20	<b>plus</b> 23:11	10:17,18,18 11:12	<b>practices</b> 56:22	50:17 63:11 71:9
<b>place</b> 16:22 20:13	<b>pod</b> 29:8 69:16	11:13 14:24 15:1	57:2 94:5 101:20	77:5,14 91:2 96:1
62:4 78:4 107:11	70:24	15:21 16:4 18:17	102:11 105:10	96:8 97:9,13
109:16 137:24	<b>pods</b> 95:17	18:17 21:25 22:2	106:1 110:10	107:17 111:12
139:11 140:3	<b>point</b> 17:10 34:3	22:10,19 23:1	122:14	128:16 130:4,6,7
143:18 168:21	38:8 65:23 66:1	24:3,5 44:12,14	<b>prea</b> 27:24 28:3,10	146:5 200:12
175:18 180:15	71:5 75:6 76:6	44:18,25 45:2,17	28:10,13,14,16,20	201:1
185:24 200:14	85:2 86:22 90:21	45:20 47:5,9,15	29:10 32:9 41:23	<b>prison</b> 162:16,19
220:4	98:3 99:19 113:9	47:17 48:22,23	68:17 92:6,7,17	<b>prisons</b> 115:22
<b>placed</b> 79:15 86:1	116:17 124:24,25	50:16 51:6 65:9	93:14 113:15,16	<b>private</b> 6:22 165:23
96:7 131:25 132:7	125:19 140:7	65:10,22 80:10	113:21 138:1	165:24
147:24 148:2	143:22 148:12	94:20,22 95:11	152:21 172:16,19	<b>privilege</b> 55:15
165:22	149:8 165:12	96:1,5,8,18,25	172:24 173:9,10	<b>privileged</b> 146:23
<b>placement</b> 21:23,23	166:6 168:17,24	97:13,17,24 98:1	174:2 185:19	<b>privy</b> 20:1
30:11,12 141:21	172:5 186:15	98:4 99:7 107:25	<b>preceded</b> 197:5	<b>probably</b> 16:18
<b>places</b> 71:7	<b>police</b> 35:13 42:3	108:21,23 109:17	<b>prefer</b> 65:20 104:25	23:10 36:7,17
<b>plaintiffs</b> 1:8 2:2,10	60:25 61:6 71:11	113:8 123:17,19	<b>preference</b> 205:2	57:11 68:12
54:15,20 56:13,14	76:9,11,13,21,22	124:1,13,23 125:2	205:12	109:21 113:21
57:18 94:3 105:16	92:24 93:15 152:9	125:14,15,16,24	<b>preferred</b> 104:20	134:9,23 139:13
105:20 111:13	<b>policies</b> 138:14,15	172:8,10 179:9,14	<b>prepare</b> 4:23 67:6	167:1 169:17
114:15 148:24	138:21 139:11	179:16,18 180:21	<b>prepared</b> 36:9 67:9	196:8
149:5,7,14,21	182:12,13,16,18	181:11 182:1	91:10 177:7	<b>probation</b> 30:5

78:19 152:17,19 152:20	<b>program</b> 23:7,7 29:7,11,12,16,18 29:18,20 30:20,24 78:24 80:3 95:6 108:24 131:8 141:23 162:15 165:22 166:1,2,4 166:11 167:18,19 185:23 187:8 212:9	<b>provision</b> 28:3 <b>provisions</b> 137:3 <b>pro</b> 131:6 <b>psychiatric</b> 141:24 143:1,5 216:20 <b>psychiatrist</b> 140:16 140:25 141:3,6,8 <b>psychological</b> 216:20 <b>public</b> 1:25 2:6 48:25 50:5 149:16 149:18 218:21,22 220:22	134:23 138:7 143:10 144:20,24 149:20 151:16 152:4 157:11 158:23 160:8 161:5 163:12,13 164:7 170:22 183:1,10 185:6,14 185:25 196:17 198:20 199:2 216:17	<b>rankings</b> 130:16 <b>rate</b> 47:10 161:23 <b>ratio</b> 113:17 <b>ratios</b> 114:6,11 <b>ray</b> 102:18,19,21,24 103:7,10,12,16 105:3,7 106:3,21 111:1 149:1 <b>raymon</b> 1:4 <b>raymond</b> 153:13 <b>reached</b> 30:1 31:5 162:14 190:14 <b>read</b> 12:7 26:25 27:5 37:14 80:25 81:1 83:5 85:10 87:24 88:14 111:16,18 149:1 152:4,5 178:12 183:10,12 186:2 214:11,24 217:2 218:6 219:3,5,8 219:10,13,15,18 219:20,23
<b>problems</b> 39:5 191:5 200:3 203:23 204:9,11 216:9	<b>programs</b> 29:14,15 29:20,24 <b>progress</b> 31:8,9 <b>prohibited</b> 68:7 <b>prohibits</b> 81:10,16 <b>promote</b> 50:2 <b>promoted</b> 9:7 15:20 45:24 46:2 59:1 103:3 109:8 113:12 192:4 <b>promotion</b> 46:11 50:12 98:9 99:1,5 102:22 109:6,12 178:23 <b>promotions</b> 49:16 49:21 113:10 121:7 <b>prompted</b> 161:16 <b>promulgated</b> 183:25 <b>pronouncing</b> 153:12 <b>proper</b> 94:5 <b>properly</b> 122:12 <b>property</b> 23:12 35:2 36:4 202:15 <b>proposed</b> 118:18 <b>propounded</b> 218:7 <b>prospect</b> 195:20 <b>protected</b> 133:19 <b>protecting</b> 137:25 <b>protocol</b> 131:22 <b>provide</b> 143:1 187:19 <b>provided</b> 51:1 77:4 215:16 <b>providers</b> 30:21 142:22	<b>publicly</b> 146:19 <b>published</b> 127:25 <b>purchase</b> 168:17 <b>purpose</b> 38:22 <b>push</b> 161:21 <b>put</b> 35:3 36:6 39:7 46:23 50:3,9 66:16 67:16,19 86:14,23 92:13 117:23 126:23 128:19 165:23 172:12 178:14,16 178:17 220:5 <b>putting</b> 67:2 128:17	<b>questioning</b> 146:7 <b>questions</b> 4:6 5:22 6:5 46:24 98:11 101:15 213:13 217:1,4 218:7 <b>quick</b> 161:22 175:16 214:23 <b>quickly</b> 26:4 132:23 133:8 134:2 <b>quit</b> 7:8 <b>quite</b> 7:9 19:8,9 26:12 38:11,14 85:13 108:9 111:24 124:4 138:16 144:2 145:5 167:17 177:4 189:7 190:22 199:25 211:1	<b>reading</b> 25:7 89:12 <b>reads</b> 219:2,5,7,10 219:12,15,17,20 219:22 <b>real</b> 112:15 189:14 <b>really</b> 21:8 40:7 44:20 51:10 57:7 90:24 92:8 103:25 132:25 133:1 159:7 164:5 207:6 212:16 <b>reason</b> 5:12 19:12 101:7 112:17 166:7 174:24 189:9 204:5 207:7 207:11 208:12 210:10 219:2,4,7 219:9,12,14,17,19 219:22 <b>reasons</b> 187:6 210:22 <b>reassigned</b> 186:8 186:14 <b>reassignment</b> 186:17,19,25
		<b>Q</b>		
		<b>qualifications</b> 98:4 99:19 101:16 154:20 204:24 <b>qualified</b> 103:3 110:10 <b>qualify</b> 107:19 <b>quality</b> 142:21 <b>quarter</b> 147:1 <b>question</b> 5:21 6:7 6:11 16:9 25:15 26:11 36:14 39:21 44:8 46:16 49:7 49:24 53:2 56:24 58:6 60:3 68:10 79:4 80:25 84:18 88:12,21 90:22 96:11 98:5,8,25 106:5 111:16 119:17 120:17,23	<b>R</b>	
			<b>r</b> 2:9 <b>radio</b> 73:22 74:1 <b>raise</b> 7:8 94:4 204:23 <b>raised</b> 98:8 101:15 106:12,20 111:3 117:12,15 118:25 139:17 144:15 <b>raising</b> 119:18 120:10 174:1 <b>ramos</b> 62:6 <b>ran</b> 166:10 <b>range</b> 48:14 <b>rank</b> 209:1,2 <b>ranked</b> 10:14	
<b>produced</b> 82:15,17 87:9				
<b>production</b> 53:25 54:8,16 213:2,19				
<b>professional</b> 51:19 140:15 142:1,24 170:20				

188:19 194:24 <b>recall</b> 13:25 15:14 25:7 27:17 29:17 29:18,20 34:11 40:7,9 42:18 44:20 45:16 48:15 49:20 50:22 54:12 54:13,24,24 56:15 57:4,8,20,24,24 59:6,10 65:24 66:4 77:5 84:4,21 84:22 85:1 88:1,5 89:12 91:11,25 92:8,8 93:5,17,17 93:18 94:11,21 95:4 96:6,21 97:11,21 98:12 102:1,4,9 103:11 106:8 107:24 108:1,12,16,17,18 110:20 111:19 113:11,14,18 114:12 115:4,6,17 116:25 117:4,8,17 117:18,21 118:21 118:22,24 121:14 122:1,17,20 123:3 124:3 125:13 128:10 129:13 130:11,12 133:11 133:14 134:3,12 134:24 135:2,4,8 135:21 139:4 144:7,12 145:1 146:2,10 147:11 147:12,14,15,19 148:10,11,13 149:11,13,24 150:13 152:11,15 153:19,21 158:5,6 158:14 159:7,11 159:16 160:25 165:11,19,25 168:6,19,20 170:16,18,21,22 172:21 174:7 178:4 179:5,7 180:20,22 181:8	181:24 184:21 186:14 187:4,10 188:20,21,22 190:3 191:15 193:6 194:22 195:11,17 200:3 201:2 204:14,18 204:22 205:1,10 205:11,15,19 206:19 207:2,10 207:13,14 208:21 208:25 209:2,16 210:6,10 212:3 213:15,17 216:7 216:19,24 <b>recalling</b> 125:2 <b>receive</b> 27:14 46:15 72:19 178:25 198:8 <b>received</b> 6:22 12:6 19:22 33:4 46:12 46:13 49:3 70:12 71:9,11 86:4 179:11 206:20 <b>receives</b> 44:3 <b>receiving</b> 32:2 206:21 <b>recess</b> 41:9 91:6 147:5 189:21 216:5 <b>reclassified</b> 180:21 <b>reclassification</b> 125:1,4 <b>reclassified</b> 125:10 125:17 <b>recollection</b> 24:16 31:3 84:7 <b>recommendation</b> 47:23 <b>recommendations</b> 31:10 109:23 <b>recommended</b> 99:25 109:20 128:7,10 <b>record</b> 32:4 67:6 72:2,3 74:8 81:1 90:21 91:2,5,7 111:18 152:5	154:21 183:12 186:2 220:10 <b>recorded</b> 43:13 220:8 <b>recording</b> 73:1 77:1 177:18 <b>recordings</b> 72:6 <b>records</b> 43:8,8 110:18 150:17,21 151:2 177:16 203:6,8,9 <b>recreational</b> 215:2 <b>reference</b> 87:3 107:8 <b>referral</b> 30:11,13 30:14 <b>referrals</b> 30:17,19 <b>referred</b> 27:7,9,9 27:10,10 39:2 50:23 166:13 <b>referring</b> 31:13 34:1,5 69:5 87:17 87:18 105:23 138:3 <b>reflected</b> 33:21 <b>refrain</b> 63:22 198:25 <b>refuse</b> 171:6 <b>regard</b> 200:14 204:9,12 <b>regarded</b> 38:17 <b>regarding</b> 19:6 56:10 63:16,17 83:3 110:17,22 114:15 151:8 177:23 178:1 197:14 206:2 <b>region</b> 17:4 <b>regional</b> 4:13 8:2,7 9:2,8 <b>register</b> 11:3 46:20 <b>registered</b> 4:13 8:24 <b>registry</b> 10:14 <b>regular</b> 118:6 <b>rehab</b> 10:19,19 33:6 108:18,23 123:21	<b>rehabilitate</b> 127:15 <b>rehabilitation</b> 45:3 127:14 <b>reinke</b> 14:6 16:1 18:14 19:18,20 22:17 38:20 <b>reintegrated</b> 133:8 <b>reintegrating</b> 134:1 <b>reintegration</b> 132:12 <b>relate</b> 80:18 163:8 <b>related</b> 10:19 12:14 <b>relating</b> 4:2 146:21 <b>relations</b> 62:4 92:25 <b>relationship</b> 69:22 69:22 80:12 82:3 82:5,7 89:24 90:5 152:8 <b>relative</b> 220:12 <b>relay</b> 86:16 <b>released</b> 81:5,11,15 154:8 <b>relevant</b> 51:2 <b>remain</b> 30:13 65:4 99:8 <b>remarried</b> 7:18 9:10 <b>remember</b> 8:5 10:23 13:2,5,7 14:3,6 15:4,10,16 20:10 21:22 24:7 25:9 28:18,18,19 31:4 32:20 35:18 42:10,20 45:15 57:7 58:24 59:15 62:14,19 67:10,13 69:7,8 70:8,11 71:21 72:22 77:8 77:12,12 78:6,7 79:6 83:18,21,23 84:2 87:8,12 89:13 92:4 93:23 97:15,22 99:4 101:5,23 103:6,13 107:7,16 110:12 110:16 114:1,7,8 115:11,18 116:10	116:15,17,20 118:16 121:7 123:5 124:6,17,22 124:25 125:6,12 128:24 132:10,11 132:14 135:9 139:17 140:24 143:19 144:5,5,17 145:4,6,7,14,18 146:6 150:2 151:20 154:4,5,9 154:12 155:7 159:9,24 162:13 166:5 168:10 171:1 176:16,17 176:18 180:19 184:25 185:1 186:7 190:17 193:6 197:8,9 199:19 206:9 207:6 208:14,24 209:7 210:15,16 211:10,11,12,12 <b>remove</b> 174:23 191:7 <b>removed</b> 124:1 <b>repaired</b> 21:11 <b>repeat</b> 43:21 52:24 56:24 60:3 85:19 185:25 <b>replace</b> 169:2 <b>replaced</b> 180:17 <b>report</b> 18:10 31:8 32:10,13,17,18,20 33:2,8,12,12,16 35:21,21 37:3,5 37:15,17,23,23 39:1,2,7,14,16,18 39:24,25 44:1 51:12 61:7,12,14 62:10 63:3 68:24 69:1,4,10 70:12 71:9,10 72:25 76:2,5,9 79:17 80:15 91:10 92:6 92:24 98:20 117:16 118:15 124:8 128:24
--	--	---	--	---



130:23 152:10,21 152:23 154:1 171:10 172:16,19 173:14,15,20 174:5,12 177:7,8 177:18,23,24 178:3 188:10 189:23 197:12 201:20 202:1 206:22 207:23 211:13 <b>reported</b> 1:21 32:5 35:19 36:3 40:7 40:14 41:17,20,24 43:16 61:5,9,17 63:4,8,18 64:20 67:21 69:8,11 92:7,10 93:14 118:12 128:23 172:17,19,23,25 174:11,14 190:6 <b>reporter</b> 2:5 34:13 136:2 220:3 <b>reporters</b> 220:1 <b>reporting</b> 28:14 31:18 34:18,22 36:25 40:9,18,21 41:11 42:2,6 185:19 206:22 211:7 <b>reports</b> 30:24 35:17 36:9,19 37:13,20 39:10,18 40:3 41:14,21 43:9 62:6 71:11,18,20 72:11,19 89:10 94:7 103:9 105:22 105:23 128:8 133:12 153:16 161:7,19 177:11 178:6 200:21 203:15 209:22,24 <b>represent</b> 207:3 <b>reprimand</b> 64:16 64:17,22,25 <b>request</b> 100:14 155:6 163:5 212:22 213:2,18	213:21 214:3 215:4,6,16 <b>requested</b> 201:3 213:24 215:9 217:14 <b>requesting</b> 35:5 <b>requests</b> 53:25 54:3 54:7,8,16,17 <b>require</b> 96:1 157:17 <b>required</b> 13:1,3,12 27:20 28:14 34:25 49:5,12 96:18 156:11 182:5 <b>requirement</b> 51:18 96:9 <b>requirements</b> 34:22 45:17 51:3 100:3 148:3 <b>requires</b> 133:18 <b>reread</b> 186:1 <b>rescind</b> 99:2 <b>rescinded</b> 98:10 99:5 109:12 <b>residing</b> 218:23 <b>resign</b> 22:12 <b>resignation</b> 19:12 19:25 79:21 <b>resignations</b> 123:5 <b>resigned</b> 9:6 18:20 18:25 19:1,4 52:9 52:11,13 123:3,6 123:6,9,12 <b>resigning</b> 195:20 <b>resolution</b> 170:10 <b>resolved</b> 193:15 <b>resource</b> 10:25 15:9 15:14 46:14,25 52:8,10 100:1 109:21 124:6 197:22 <b>resources</b> 27:13 48:11 51:14,24,25 52:3 62:16,17 70:4,5 98:16,18 98:21 114:19 124:7 149:16,18 156:25 159:18 171:11 188:21,24	189:6,7 190:15,17 197:20 198:18 199:3 201:21 <b>respect</b> 20:2 25:10 31:14 34:18 35:19 38:7 40:13 46:17 48:11,23 50:12 51:11 69:20 85:23 88:18 93:12 101:14 106:12 109:1 113:15 119:17 128:15 137:24 142:7 149:14,25 152:7 154:19 155:16 162:4 169:15 170:2,8 198:13 200:15 202:10 205:24 <b>respectfully</b> 155:6 <b>respond</b> 115:20 <b>responded</b> 57:15 115:23 <b>responding</b> 5:23 <b>response</b> 64:6 87:10 104:10 214:20,21 215:3 <b>responses</b> 53:9,22 53:25 54:3,11,15 54:21 212:21 213:1,13,18 <b>responsibilities</b> 18:7 38:12 124:10 <b>responsibility</b> 7:12 33:11,14,15,17,18 90:1 92:20 187:19 188:8,16 <b>responsible</b> 24:23 24:25 25:1,11,19 25:20 26:13 28:7 35:23,24 37:3 40:25 50:19 51:20 89:19,24 90:6 182:9 203:22 <b>rest</b> 152:4 <b>restate</b> 6:7 <b>restitution</b> 35:5 <b>restrain</b> 13:7	<b>restrained</b> 176:2 <b>restraining</b> 167:1 <b>restraint</b> 176:5 177:9 <b>restraints</b> 112:6,6 130:13 131:4 172:3 <b>restricted</b> 159:14 163:14 <b>restrictions</b> 147:24 148:2 168:7 <b>restructure</b> 126:3 130:8 <b>restructuring</b> 126:6 181:3 <b>result</b> 38:24 64:15 66:15 72:12 79:19 98:8 166:15 <b>resulted</b> 51:12 <b>resume</b> 10:4 23:16 <b>retaliation</b> 56:11 201:4,8,9 204:20 <b>retire</b> 210:19,25 211:16 <b>retired</b> 28:21 60:12 121:13 210:24 216:13 <b>retirement</b> 58:15 192:21 210:23 211:3 <b>retract</b> 207:5 <b>retraumatized</b> 173:24 <b>returned</b> 22:16 <b>review</b> 28:25 31:2,3 31:7,9 37:16 50:24 52:17 53:6 53:9,21 54:9 138:22 139:2 151:1 161:7 178:5 198:1 <b>reviewed</b> 39:16 52:19 53:2 54:11 54:20,22 55:2,6 138:22,24 178:2,9 178:10 <b>reviewing</b> 82:23 213:11,20 214:9	<b>reviews</b> 142:21 <b>reyna</b> 1:6 149:3 170:25 171:3,5,5 171:12 172:22 202:2 207:18 <b>rhonda</b> 1:4 2:24 149:2 197:7 198:9 199:13 200:1,5,7 200:9,14 201:3 204:8,11 207:8 208:7,8,13,17 209:9 210:4,11,13 <b>rhythm</b> 12:8 <b>rich</b> 207:21,23 208:1,6 <b>richard</b> 140:6 206:12 214:14 <b>right</b> 5:10 6:9,25 13:19 14:8,11,18 15:3 16:13,17 17:9 21:13,14,16 24:14 26:10,19 32:25 33:1 34:7 39:22 42:23 44:15 57:17 63:2 66:1 67:20 69:1 73:19 75:15 91:5 94:18 96:20 98:6 102:3 105:1 121:22 124:18 125:3 133:19 136:19 139:4 140:4 141:9 142:3 146:25 152:3,14 153:4,10 156:17,19,20 157:4,10 159:20 159:23 162:21 169:19 175:24,25 180:16 182:10 189:16 201:12,13 203:9 215:10 <b>rights</b> 27:10,19 31:12,13 126:9,14 127:11,21 133:16 133:25 <b>riley</b> 18:19,20,25 19:7 20:9,13 21:13 179:12
---	--	--	---	---

181:18	45:19,24 58:20,25	65:21 70:22 108:5	78:14 80:20 81:3	25:12 26:1,9,14
<b>rileys</b> 19:25	72:20,22 94:12,14	121:5 126:24	81:9 82:20 88:10	33:5 40:1 65:6,12
<b>ring</b> 153:5	96:22,25 97:9	133:9 148:16	88:13,20 89:2	65:21 70:22
<b>risk</b> 155:20	98:4,9 99:1,17	149:10 154:20	90:3,14,22,24	107:12 108:5
<b>risks</b> 30:9 66:9,10	100:19 101:13,14	155:21 159:5	91:5,7,8 96:5,7,13	109:17 121:5
141:20	101:15,21 102:23	160:3,5 162:11	104:23 105:5,25	154:20 159:5
<b>rn</b> 11:23 12:1,10,15	109:1,6,24 125:13	164:9 165:8 195:5	106:5,14,18	162:11 164:9
18:3,4	125:18 126:7	199:20 200:5,9	111:20 119:5,12	165:8 185:23
<b>rns</b> 10:2 18:3	128:16 130:7,14	<b>saint</b> 10:9,11,16,17	120:4 121:1	186:6 187:17
<b>roberto</b> 150:19,20	169:2,6,6,8,15,24	10:22 11:5	134:24 136:4,11	189:4,5 194:25
<b>robinson</b> 1:6	170:15 171:8,10	<b>sarah</b> 61:15	136:12 137:8,15	195:5 197:6
115:12 149:7	171:23 172:7,10	<b>sat</b> 99:9 175:5	137:21 138:5,8	199:20 200:6,10
<b>robinsons</b> 117:15	172:13,16,25	<b>saved</b> 103:6 119:9	143:16,23,24	200:15
<b>rock</b> 135:10	173:8,13,20,24	<b>saw</b> 33:1 39:2 58:10	144:15 146:18,25	<b>see</b> 15:16 37:14
<b>rogers</b> 194:4	174:5,7,9,10,16	76:23,24 84:4	147:4,6 148:7,23	72:14,15 81:23
<b>rohrbach</b> 42:5 95:1	174:19,25 175:7,8	91:21 104:22	149:23,25 151:9	87:3,5 93:4
96:23 97:1,2	178:15 179:3,6,8	141:11 142:18	151:13,15 152:7	100:16 102:13
100:23 109:7	179:19,22 181:10	160:10 214:10	157:20,21 158:25	141:12,19,25
190:6	181:21 182:25	<b>saying</b> 10:14 110:7	160:13,22 163:16	142:25 144:21
<b>rohrbachs</b> 95:5	183:6,19 204:17	112:16 114:8	164:14 177:6	173:21 176:17
189:24 190:6,19	204:21,24	116:10,20 119:23	181:16 182:9,13	177:14 193:24
210:25 211:5	<b>rpr</b> 1:23	142:12 145:15	182:17,21 183:15	198:6
<b>rolan</b> 211:19	<b>rule</b> 36:12 49:14	153:4,10 172:8	185:2,10,17 186:1	<b>seeing</b> 24:7 117:18
<b>role</b> 30:22 42:19,21	81:9 138:8,11	173:8 176:19	186:5 189:22	117:21 129:1
45:23 65:5,11	155:12	179:5,7,18 194:22	196:21 197:4	154:2,3,7 213:15
68:2 71:1 94:15	<b>rules</b> 101:20 137:19	203:11 204:14	198:23,25 199:2,6	213:17
95:5,13,14 108:3	137:22 138:2,3	<b>says</b> 214:20	200:20 203:1,2	<b>seek</b> 47:5,7 169:4
109:2 126:4 140:6	188:13,15	<b>schedule</b> 172:1	205:18,21 206:14	170:9 171:23
140:9,25 156:25	<b>rumor</b> 151:20,21	206:4,7	206:17 213:9,12	<b>seeking</b> 195:23
158:7 179:22	190:3	<b>scheduled</b> 46:22	214:7,11 215:22	<b>seeks</b> 197:23
180:9 189:14	<b>rumors</b> 145:11,16	118:8	216:2,6,25 217:3	<b>seen</b> 5:25 82:21,24
<b>roles</b> 124:9	145:16,17,20	<b>scholarship</b> 8:20,21	217:7	89:10 93:10 176:2
<b>romantic</b> 69:22	146:2,4 153:3,16	<b>scholarships</b> 8:20	<b>scooter</b> 191:10	213:6
78:15	<b>run</b> 42:8,12 120:11	<b>school</b> 6:18,22,24	<b>scope</b> 53:1	<b>sees</b> 83:13
<b>room</b> 20:24 21:6	137:4	6:25 174:21 175:4	<b>score</b> 50:25 51:13	<b>segregated</b> 126:11
115:8 126:19,20	<b>running</b> 75:19	206:13	<b>scoring</b> 51:11	128:13
126:23 127:19,24	137:23	<b>schoppe</b> 2:11,12	<b>scott</b> 166:19	<b>select</b> 45:5
127:24 128:3,7,12	<b>ryan</b> 11:22	3:3 4:6,8 13:23	<b>screen</b> 156:22	<b>selected</b> 22:22
128:15,25 129:10		14:8,18 16:14	<b>screening</b> 50:19	44:13 46:2 51:23
129:11,17,23	<b>S</b>	19:20 24:20 25:17	<b>seal</b> 220:15	97:3 99:17 109:14
130:13,17,19,20	s 2:9 3:5	26:18 34:4,5	<b>second</b> 7:9,20 44:21	181:10,13
130:25 131:25	<b>sabrina</b> 175:22,22	39:23 41:4,8,10	87:24 99:17 109:8	<b>selecting</b> 51:8,9
132:7,22 162:4	176:4	44:10 49:11 50:5	109:10,13 149:21	<b>selling</b> 194:14
174:20 219:24	<b>safe</b> 144:10 175:11	53:6,20,21 54:14	175:7	<b>send</b> 8:15 9:24
<b>rooms</b> 20:17 128:17	175:13	55:1,5,16 58:8	<b>secure</b> 84:12	179:23 183:17
128:19	<b>safety</b> 24:24 25:12	59:7,20 60:1	111:15	<b>sending</b> 109:22
<b>roters</b> 42:17,19	25:23 26:1,9,13	61:20 64:9 68:14	<b>secured</b> 21:5,7	174:3 207:11
44:10,12,25 45:2	33:5 40:1 65:6,11	71:16 77:14 78:13	<b>security</b> 20:12,16	<b>senior</b> 35:4

<b>seniority</b> 188:1,5	<b>shared</b> 40:4 66:11	<b>signature</b> 217:14	<b>sitting</b> 83:12	171:2,17 176:8
<b>sense</b> 6:3,5 146:9	66:25 77:15,17,18	219:25	<b>situation</b> 20:10	181:2
146:10	85:3 101:12	<b>signed</b> 103:19	26:5 66:12 67:2	<b>sorts</b> 66:5
<b>sent</b> 9:13 109:18	117:23 146:13	190:8	85:4,7,15,18	<b>sound</b> 124:18
128:16 130:7,14	195:3	<b>significant</b> 65:13	86:15 146:22	<b>sounds</b> 156:15
131:6 177:15	<b>sharon</b> 1:11 2:16	166:1 167:4	<b>situations</b> 12:4	<b>source</b> 130:21
179:4,6	2:24 3:8 61:2	<b>signing</b> 103:23	<b>six</b> 17:15	<b>south</b> 2:3,20
<b>separate</b> 21:3	109:7 119:20	104:13	<b>sixmonth</b> 185:22	<b>speak</b> 36:16 56:6
167:20 174:23	190:7,19	<b>similar</b> 129:6	<b>skills</b> 107:22	58:14,23 59:1,3
<b>september</b> 1:18 2:4	<b>sharons</b> 109:5	<b>simply</b> 16:24	<b>sleeping</b> 186:13	85:8 93:2 102:19
77:10 220:16	<b>sharp</b> 163:17	184:11 206:22	<b>slipped</b> 135:10	114:20,20 119:20
<b>series</b> 159:17	<b>sheet</b> 210:14 213:1	<b>sir</b> 6:15 15:5,7,22	<b>slow</b> 8:14	155:5 171:12,20
<b>serious</b> 173:9 175:9	218:10 219:1,24	17:18 18:9 28:5	<b>small</b> 23:8,10	<b>speaking</b> 14:10
<b>serve</b> 42:21 44:11	<b>sheetrock</b> 35:3 36:6	29:13 37:18 40:20	<b>sme</b> 50:24,24 51:5	58:2 81:3 103:11
45:19	<b>sheets</b> 150:11,14	41:15,18,22 42:4	51:21,22	120:17 192:15
<b>served</b> 25:24 38:8	151:1 190:8	42:7,24 43:14,17	<b>smes</b> 51:8,9,23	196:12 198:25
43:10 53:22	<b>shell</b> 36:16	44:18 45:2,9,11	<b>socializing</b> 81:10,17	201:17,22 203:10
<b>service</b> 30:6	<b>sheriff</b> 35:16	45:13,18 50:15	<b>solutions</b> 63:23	207:9,17 208:13
<b>services</b> 206:6	<b>shes</b> 146:20	52:12,14,18 53:8	64:20 66:7 72:24	213:12
<b>set</b> 48:19 72:4	<b>shift</b> 108:8 186:8,10	54:2,5 55:17 56:4	78:22 94:14	<b>special</b> 12:20 32:17
137:22 167:18	186:15 187:14,21	56:17,20 58:19	129:24 169:7	148:3 197:8
196:22 198:3,5	187:22,22 194:21	60:17,23 62:11	179:20,25,25	199:13,15
206:4 212:22,24	195:9,18,19,20,21	64:15 75:11 78:8	180:10 183:20	<b>specialists</b> 191:5
212:25 213:3	207:25 208:10	85:11 89:9 91:11	<b>solved</b> 189:15	193:18
220:5,15	<b>shifts</b> 110:9 121:4	91:20,23 92:21	<b>solving</b> 104:4,5	<b>specific</b> 57:10 69:21
<b>sets</b> 162:25	188:9 204:20	94:9,24 95:4,16	170:7 188:25	79:9 97:19 110:13
<b>seven</b> 10:23 73:6,11	<b>shirts</b> 163:7	95:18,25 102:5,14	189:8,11 193:7,12	110:15 112:1,2
73:12	<b>shocked</b> 102:23	103:21 104:8,11	195:2	118:22 151:7
<b>sex</b> 36:21,23 41:19	<b>shop</b> 102:21	105:19 115:3	<b>somebody</b> 51:17	194:13 197:17
63:9 75:8,10 89:4	<b>short</b> 67:17 132:24	116:10,19 117:4	62:17 92:17 101:6	<b>specifically</b> 34:23
89:14 93:10,10	<b>shorthand</b> 2:5	118:19 123:2,10	168:8 180:8 181:4	36:4 41:21 56:3
<b>sexual</b> 60:14 62:3	220:3	123:13 125:21	201:10 211:9	56:25 85:23 163:2
69:21 78:16 89:24	<b>shortly</b> 19:24 60:12	126:17 129:2,5	<b>someones</b> 163:9	186:5,6 215:5
92:25 93:19	93:4	135:1 140:10,12	<b>son</b> 175:15	<b>specifics</b> 101:25
152:25 153:3,19	<b>shouldnt</b> 83:14	142:11 148:25	<b>sooner</b> 90:15	170:18
<b>shampoo</b> 162:16,17	128:12 133:21	150:6 152:6,11,15	<b>sorry</b> 15:10 34:11	<b>speculate</b> 176:25
162:18,19 163:25	<b>show</b> 139:16	156:14 158:12,19	59:20 64:23 78:12	<b>speculation</b> 16:9
164:1	162:20 194:18	161:14 165:14,18	78:13 92:4 93:24	44:8 88:18 89:21
<b>shane</b> 1:5 2:25	<b>showing</b> 77:2	167:21 171:21	114:1 124:20	90:10,17 96:11
149:2 186:6,7	<b>shows</b> 128:3	172:6 178:7	141:19 154:9,10	120:1,23 144:12
188:20,21 194:21	<b>sick</b> 192:8	179:15 186:9,16	162:22 180:25	158:23 160:8,20
194:23 195:1,9,13	<b>side</b> 63:23 176:6	190:12 192:19	209:22 210:16	196:25
195:20	212:15	195:11 205:4,6,13	214:4,7 215:19	<b>spells</b> 87:21
<b>shanes</b> 195:18	<b>sided</b> 212:11	205:25 206:19	<b>sort</b> 36:4 44:16	<b>spend</b> 64:19
<b>shank</b> 163:24	<b>siding</b> 212:5,6	207:16 214:1	48:18 51:16,19	<b>spending</b> 63:22
164:12 165:2	<b>siegel</b> 191:13,15	215:25 216:12	86:7 95:9 100:13	64:13 66:6 68:1
<b>share</b> 69:25 82:14	<b>sign</b> 102:22 108:21	<b>sit</b> 97:12 143:24	113:20 117:6	71:6,19 92:13
199:21 206:14	178:12 217:2	<b>site</b> 105:14	153:24 170:14	166:16,17 167:17

167:20 215:2	131:7,8,12,14,21	166:11 172:4	<b>stored</b> 73:11	28:1,11,17 32:3
<b>spent</b> 9:4 20:15	131:24 132:1,2	191:4	<b>story</b> 66:18	32:25 33:1,7,13
23:2,6 69:2 70:19	133:1,2,10 138:23	<b>state</b> 1:11 2:6 7:13	<b>strain</b> 19:19	33:19 34:24,25
175:17	146:13,20 147:6	8:10,21,23,24	<b>strangle</b> 36:17	37:15,16,25 38:24
<b>spine</b> 191:6	147:20,23 148:12	10:6,10,12,13	<b>stream</b> 203:17	39:8 42:13,15
<b>spoke</b> 5:3 20:3	148:22 155:2,21	16:22 28:9 34:2	<b>street</b> 2:3,13,20	44:21 47:6,18
59:10,14 78:3	156:4 161:17,20	39:15 44:3 46:10	<b>strengthened</b> 172:7	48:24 49:21 52:4
100:20 101:25	161:24 162:11	67:11 68:16 98:16	172:10	52:7 59:19,20
105:7 119:5 120:9	163:5,6 169:9,9	98:21,23 99:10	<b>stressful</b> 211:24	66:23 72:5 78:11
146:19 163:4	169:12,14 170:12	100:17 113:4,21	<b>strike</b> 84:18	80:2 108:9 113:25
207:20,22	170:14,22,23	120:24 185:3,9,12	<b>structure</b> 172:1	114:3 130:4,6,9
<b>spoken</b> 55:9 127:18	172:14 173:3	202:15,15,24	<b>struggles</b> 161:21	136:18,19,22
143:11	174:15 176:12	<b>statement</b> 136:25	<b>study</b> 124:5	153:22 159:2
<b>sponsored</b> 101:8	177:21 178:20	170:8 172:11	<b>stuff</b> 21:9 103:6	160:3 163:20
<b>spot</b> 178:15,18	179:24 185:23	174:25 194:19	105:4 111:11	177:14 178:12
182:1	186:6 187:17,20	195:7,8	119:9 162:12	184:17 200:8
<b>spousal</b> 55:14	188:9,17 189:4,5	<b>statements</b> 136:5	<b>subject</b> 3:9,11	209:18 211:23
<b>springtime</b> 144:9	194:14,25 197:6	192:16	50:23 215:7	<b>superintendents</b>
<b>sso</b> 62:6 65:17	197:12 200:15	<b>states</b> 1:1 10:3	<b>submit</b> 31:9 35:4	33:13 138:19
107:19	201:25 203:15	<b>statewide</b> 28:14	47:25 48:3,4,5	<b>supervise</b> 69:14
<b>st</b> 6:21 10:10,10,16	204:15 206:20	173:10	100:14 136:4	122:12 191:17
17:8 18:4 122:23	207:25 209:1,2	<b>statute</b> 34:2,8	<b>submitted</b> 23:15,16	192:11,13
177:15	211:24 216:15	<b>statutes</b> 34:10	46:25 139:3	<b>supervised</b> 17:24
<b>staff</b> 9:3 11:15	<b>staffing</b> 30:2,2,7	<b>stay</b> 141:22 147:15	<b>submitting</b> 38:23	18:2,3 95:8,17,19
13:18,20 14:1,22	114:10	160:5,15	38:23	95:20 100:25
18:3,6 20:15	<b>staffonjuvenile</b>	<b>stayed</b> 164:18	<b>subordinate</b> 95:7	107:6 148:6 192:5
24:24 25:13 26:2	36:23	<b>steady</b> 203:17	<b>subscribed</b> 218:17	200:7
26:9 28:12 30:7	<b>stafftojuvenile</b>	<b>stenographically</b>	<b>successful</b> 167:24	<b>supervises</b> 69:15
31:23 32:11,19,21	114:6	220:8	<b>sudden</b> 105:4	<b>supervising</b> 95:15
33:17,18 35:9,9	<b>stamps</b> 82:18	<b>step</b> 65:1 67:11	<b>sue</b> 134:11	107:12,19 109:17
35:12 37:8 38:25	<b>standard</b> 100:9,12	75:13,14 87:14	<b>suffered</b> 176:22	189:5 194:25
43:5 46:14 55:24	126:21 127:12,13	94:19	177:3	196:10 197:6
56:2,2,2,5 57:14	127:23 128:1	<b>stepping</b> 46:8 94:2	<b>sufficient</b> 107:18	<b>supervision</b> 12:22
57:14 58:20 61:8	131:22 184:14	<b>steps</b> 47:12 64:16	127:5	47:8 51:19 100:6
61:13 62:24 63:19	<b>standards</b> 38:16,17	67:4 69:4 70:15	<b>suggest</b> 204:19	148:3 163:18
66:14 67:1 69:15	38:17	77:19 81:19 86:8	209:9	180:7,11
73:16 78:4,16	<b>standing</b> 73:3	86:9,11 87:22	<b>suggestions</b> 118:11	<b>supervisor</b> 14:2
80:16 95:20	91:18 103:7,8	88:25 91:1 131:10	118:22	18:4,4 25:3 30:8
101:24 102:2,10	<b>standings</b> 40:10,11	132:1,6 164:20	<b>suit</b> 208:3	33:18 37:6,10,10
107:12 109:17	<b>stands</b> 128:4	173:20	<b>suite</b> 2:3,13,20	47:4 48:21 56:12
110:6 111:25	215:20	<b>stick</b> 127:22	<b>summer</b> 197:5,12	63:21 65:12,17
112:8,20,23 113:1	<b>start</b> 7:6 23:10	<b>stimulate</b> 64:1	<b>superintendent</b>	66:8 69:11 73:13
113:17 114:8,9,19	52:15 109:21	<b>stirred</b> 208:18	1:13 13:13 15:9	88:24 100:15,17
114:20 118:8,10	157:6 203:3,6	209:6	15:11 17:20 18:11	101:10 110:2
118:12 120:8,9	<b>started</b> 7:2 8:10	<b>stood</b> 39:1 72:24	18:14,15,16,18	111:7 121:23
121:5,10 122:2,4	11:19 13:17 14:10	<b>stop</b> 83:15	22:6,7,10,23 23:1	123:21 124:12
122:12 126:4,7,12	15:12 24:13 44:22	<b>stopping</b> 84:13,13	23:9,18,18,20,22	125:20 127:8
127:7 130:1 131:3	108:13 130:10	<b>store</b> 168:5,9	24:21 25:8 27:21	143:10 144:22



150:25 154:5	110:23 111:1	41:9 46:23 62:4	<b>task</b> 203:19	125:23,25 134:10
157:25 165:9	138:6 147:4	67:5 72:23 75:20	<b>tattoos</b> 194:11	153:18 157:4
177:14 178:9	151:23 153:4	77:2 78:3 91:1,3,6	<b>teacher</b> 174:14	169:8 179:20
186:4 188:10,14	156:8 157:20	98:14 114:21	206:3	180:8 195:4
188:16 190:7	159:9 161:10	131:10 132:1,6	<b>team</b> 30:15 100:7,7	199:22
191:18 193:13	163:11 177:8	147:5 158:16	128:18 163:6,7	<b>termination</b> 76:8
195:5,25 196:22	182:13 191:25	165:8 167:25	169:13	169:10 181:19
197:2,23 199:20	198:12 202:16	173:8 189:21	<b>tech</b> 33:6 108:18,23	<b>terms</b> 33:9 43:3
200:6,10 203:21	211:8 213:15	216:5 220:4	123:21	50:20 51:11,16
206:1 207:24	216:18	<b>takes</b> 100:15	<b>technician</b> 45:3	63:3 87:7 100:3
<b>supervisors</b> 30:20	<b>surgery</b> 191:1,7,7	<b>talk</b> 39:17,23 56:9	<b>teepee</b> 194:15	130:2,16 160:13
38:25 39:8 43:7	<b>surprise</b> 85:10	65:8 70:5,24	<b>telemedicine</b> 143:6	201:17
104:6 117:24	88:14,15	83:16 102:15	<b>telephone</b> 211:20	<b>terry</b> 93:22
118:7 150:15	<b>surprised</b> 146:7,8	103:1,18 135:24	<b>tell</b> 4:2 5:8 6:1,1,13	<b>testified</b> 4:3 86:12
164:19 170:4	<b>surprising</b> 88:6	142:15 150:25	19:4,5,17 21:17	106:6,14 135:11
180:1 181:9	<b>survey</b> 32:9	171:4 173:21	22:9 24:17 32:12	135:13 137:25
186:22 187:19,20	<b>surveys</b> 38:24 43:5	174:10,13 175:7	34:12 52:13,19	183:24 199:22
188:8 196:9	43:6	175:10	56:4 75:6 79:12	201:24 213:7
<b>supervisory</b> 18:7	<b>suspended</b> 158:14	<b>talked</b> 5:1 10:1	83:1 84:19 93:6,9	215:11 216:6,22
65:5 95:9,10,11	<b>suspension</b> 65:1	30:15 31:12 53:1	98:11,13 100:5	<b>testify</b> 5:11 105:17
96:1,8,8,18 97:9	87:4,13	53:12 58:10,16	111:20 114:5,8	105:21
97:14,25 99:22	<b>swiss</b> 10:4	59:13 64:18 66:8	115:7 117:9	<b>testifying</b> 5:8 71:17
100:4 107:1,5,10	<b>sworn</b> 4:2 136:5,24	66:9 70:6 72:24	121:15,16,17	136:2
107:18,25 109:15	218:2,17	80:18 81:25,25	123:8,10,11	<b>testimony</b> 3:2 5:13
109:19 179:21	<b>syringa</b> 140:17	93:13 103:2,3,5	140:14 141:4	19:14 88:9 106:17
180:9	141:1,8,14 142:4	103:10 105:25	142:9 145:8,11	135:22 136:9,24
<b>supplied</b> 215:23	<b>system</b> 38:2 40:19	111:7 142:13	147:20,23 148:16	148:5 181:13
<b>supply</b> 214:19	138:18 202:25	146:15 154:6	151:4 166:16	215:20 220:7,11
<b>support</b> 4:20 7:16	<b>systems</b> 27:11	166:18 167:15	169:1,3,22 170:13	<b>texting</b> 78:20
12:3,7 27:11	<b>T</b>	175:5 211:2	171:7 187:3,5	<b>thank</b> 4:7 6:12
70:20 169:8,16	<b>t</b> 2:11,12 3:5	<b>talking</b> 11:8 13:21	191:12 192:24	77:13 217:11,11
171:23 172:13	<b>table</b> 174:22 191:3	14:19 62:25 64:7	196:5 200:1 204:8	<b>thats</b> 14:8,18 17:5,6
178:20 179:24	<b>tacoma</b> 9:13,16	67:17 71:15 72:18	204:11 211:22,22	18:23 19:25 26:6
<b>supported</b> 103:20	<b>take</b> 6:14 7:4 13:1	73:3 83:10,17	212:17	40:24 42:14 46:16
193:24	13:13 18:17 23:25	91:8 96:3 109:10	<b>telling</b> 5:1 16:12	56:15 57:14,16
<b>supportive</b> 58:13	35:16 65:15 69:4	119:3 122:20	72:22 84:4 174:1	63:7 83:9 88:14
<b>supposed</b> 49:18	70:15 81:19 82:20	125:19 130:3	<b>temporary</b> 21:10	92:5 96:16,20
100:5 139:16	82:21 85:7 86:8,9	136:1 146:20	<b>tenhour</b> 110:9	99:3 100:8 103:25
162:11	87:15,22 88:25	150:13 151:7,12	121:4	105:2,8 107:23
<b>supposedly</b> 79:1	95:18 112:9	151:17 157:19	<b>tennessee</b> 4:14 6:14	114:2 115:8,10
<b>sure</b> 13:16 14:3	132:16 154:25	182:11,15 184:3,7	6:16 7:13,21 8:1	120:16 121:7,14
26:24 32:6,15	164:19 166:20	195:13 196:17,19	22:15 194:2	121:22,25 123:6
33:19 34:4 38:13	167:16 174:16	196:25 198:23	<b>tenure</b> 52:4	124:21 125:1
41:8 45:21 46:17	195:6 209:20	200:22 202:5	<b>term</b> 115:9	127:25 134:13
48:15 50:3 53:20	213:4,5 214:2,23	204:3 210:8,23	<b>terminated</b> 22:12	137:20 144:12
56:11 57:11 59:9	214:24	<b>tangible</b> 213:2,19	121:18,19,23	145:11 153:20
59:13 73:6 81:13	<b>taken</b> 2:1 4:9,18	<b>targeted</b> 176:19	122:3,9,10 123:16	156:23 160:1
85:20 97:18 109:9		<b>tarnished</b> 130:16	123:17,20 124:15	170:5,13 171:7

174:22 177:10,13 179:6 183:11 189:2 191:19 197:2 202:19 206:19 214:17 215:22,23 217:6 217:11 <b>thereof</b> 218:6 <b>theres</b> 140:4 186:11 186:12,12 <b>theyre</b> 73:12 103:4 157:6,7 194:14,15 <b>theyve</b> 34:20 75:25 <b>thing</b> 20:13 36:4 77:21,23 113:20 142:4 163:3 171:19 176:4 187:15 194:2 195:2 207:22 209:20 217:3 <b>things</b> 10:6 12:8 28:8 29:1 31:16 36:20 39:24 40:2 40:22 41:11 55:22 66:5 68:18 100:7 103:2,5 105:6,17 105:21,24 110:6 112:21 120:14 128:21 130:8 132:8 138:1,13 149:19 156:13 161:7 162:17 164:11 165:6 166:20 171:2,17 184:1 203:10,11 208:17 210:5 212:19 213:2,19 216:7 217:9 <b>think</b> 16:12 17:14 24:15 31:5 33:25 38:20,21 39:11 41:10 49:15 50:1 53:24 54:25 58:16 86:23 89:3 90:6 98:15 101:5 116:15 122:3 123:7 125:2 134:12 135:11	136:23,23 144:2,3 148:20 159:6 163:13 165:10 166:11,13 167:2 175:9,22,24 180:19 183:1,15 184:22,23 190:20 191:4 193:25 195:4 196:8 201:25 213:7 216:3,25 217:9 <b>thinking</b> 103:6 120:2 194:5 <b>third</b> 6:1 7:16,18 <b>thomson</b> 59:12 61:7 61:11,16 63:4 67:21 70:6 71:10 75:12 77:22 115:1 116:13,13 117:22 <b>thorough</b> 173:15 174:6 <b>thoroughness</b> 173:13,19 <b>thought</b> 11:5 39:5 109:25 152:17 173:19 175:7 181:17 193:1 212:1 <b>threat</b> 127:17 <b>threaten</b> 134:10 <b>three</b> 7:18 9:21,22 138:19 210:24 <b>threshold</b> 51:17 <b>throwing</b> 191:1 <b>tied</b> 137:11 <b>time</b> 6:5 7:15,19 8:9 9:5 11:14 14:5 15:11,25 16:11,11 16:20,22 17:7 22:24 23:3,6,11 23:17 27:17 29:10 30:11 43:10,11 46:4,6 49:20 52:6 56:12 58:12 59:16 63:22 64:13,19 65:23 66:1,6 67:18 68:1 69:3 70:19 71:6,19	76:15 78:9 82:10 82:21 85:2 91:22 93:9,19 95:5,22 97:8 99:17 105:5 105:15 108:7 109:8,10,13,13 110:17,18 111:8 113:13,24 114:3 115:23 121:13 123:19 124:5,19 124:25 125:25 126:19,21 127:1,5 127:24,24 128:3,7 128:11,15,25 129:11,11,17,24 130:7,13,17,19,20 130:25 132:24 133:5 135:12 139:4,7 142:19,23 142:25 143:22 145:3 146:9 147:16 148:14,21 150:4,11,13,16,17 150:21 151:1,9,10 151:17 162:4,22 163:20,24,24 166:6,8,20 169:25 173:9 175:7,17 177:4 184:17 186:15,23 189:22 189:24 190:6,8 191:11,13 192:5,6 192:25 194:1,1 199:21 200:9 202:5 203:18 206:3,13 207:9 208:13 209:17 210:14 211:5,6,6 212:14 215:5 216:18 217:7 220:4,5 <b>times</b> 10:6 19:8 84:13 139:13 163:21 164:4 216:6 217:8 <b>timing</b> 144:10 <b>timmy</b> 36:8 <b>tired</b> 65:19	<b>title</b> 180:12 <b>today</b> 4:24 5:7,11 5:22 216:7,22 <b>today's</b> 52:16 55:9 <b>todd</b> 123:5 <b>toiletries</b> 162:24 <b>told</b> 8:12 11:9 16:1 19:11,15,22 20:3 22:16,19 35:22 36:12 61:11 65:8 65:18 70:25 79:19 88:2 91:15,17,20 107:10 119:8 142:16 143:14 145:15 146:14 160:1 167:15,22 169:14 170:1 171:22 174:13 175:6 179:3 181:13 187:2 193:14 203:17 208:1,5 212:1 215:25 216:1 <b>toll</b> 211:23 212:10 <b>tom</b> 121:23 122:9 122:10,10,15,20 123:16 124:10 125:23 129:9,14 131:7 149:3 160:24 169:2,7,10 178:16,18 179:20 180:7 205:24 207:18 <b>tomorrow</b> 47:9 <b>toms</b> 131:12 181:19 <b>top</b> 26:18 82:16 <b>topheavy</b> 205:9 <b>tort</b> 60:11 <b>touch</b> 173:11 <b>touched</b> 173:7 174:11,19 <b>touching</b> 66:15 <b>tour</b> 10:11 <b>tracked</b> 73:16,18 <b>trade</b> 107:7,7 <b>train</b> 10:2 <b>trained</b> 23:5 26:2 28:20 31:18,24	46:18 131:8,12 189:11,12 <b>training</b> 12:20,21 12:22 13:6 27:14 28:11 31:11,22 37:12 38:7 45:25 46:8,9,13 49:3 99:23 100:6,13,15 100:15,21,22 101:3 109:18,19 109:20 113:15 126:4 131:14 133:15 192:5 <b>trainings</b> 12:25 <b>traipse</b> 10:3 <b>transcribed</b> 220:8 <b>transcript</b> 28:25 <b>transcripts</b> 55:2,5 <b>transfer</b> 179:17 181:2 <b>transferred</b> 208:9 <b>transition</b> 17:11 <b>transitioned</b> 14:22 17:15 <b>transmitting</b> 33:9 <b>transport</b> 158:9,11 158:12 168:1 <b>transported</b> 141:15 <b>traumatized</b> 174:25 <b>treat</b> 140:11 <b>treated</b> 31:14 131:11 <b>treatment</b> 30:15 139:22,23 <b>tremendously</b> 169:11 <b>trespass</b> 154:24 <b>tried</b> 36:1 193:19 207:10 208:3 <b>trouble</b> 159:6 167:6 <b>trucking</b> 10:1,9 <b>true</b> 56:18,23 57:3 60:20 76:4 81:24 107:3 214:17 218:8 220:10 <b>truth</b> 4:2 5:8 <b>try</b> 5:20 39:19 70:25 88:25
--	--	---	--	--

164:12,20 213:23 <b>trying</b> 110:12 112:15 124:25 127:21 180:2 <b>tumor</b> 191:6,7 <b>turn</b> 98:20 <b>turned</b> 143:4 <b>twice</b> 39:1,14 58:17 128:2 <b>two</b> 7:16,17 8:19 11:11 16:12 18:3 18:20 34:3 38:10 45:21 61:11,22 62:4 63:6 72:21 91:14 161:22 190:20 191:4 195:4 203:16 206:10 216:2 <b>type</b> 71:14 <b>types</b> 36:2 <b>typical</b> 189:4 <b>typically</b> 35:13 36:5 96:9 132:16 177:21 188:4	119:21 120:16 121:2,3 133:17 151:16 202:14 <b>understood</b> 19:19 46:19,20,21 112:16 119:13 126:8 175:8 188:25 <b>undertaking</b> 38:11 <b>underwent</b> 191:7 <b>undisciplined</b> 116:7,9 <b>unique</b> 196:14 197:17 198:3 <b>unit</b> 9:4,6,8,20 10:19 20:11,12 29:17 37:11 43:6 45:3,24 63:23 64:20 66:7,14 69:2,3 72:23 78:22 94:12,13,16 94:19 95:10,12,14 95:20,23 97:23 98:9 108:24 122:12 123:23,25 124:9,11,13,23 125:2,16,18 126:3 126:6,13,14 169:6 178:10 179:19 180:14,17,21 181:6,14 <b>united</b> 1:1 10:3 <b>units</b> 29:20 128:6 129:3,7 <b>unreasonably</b> 111:21,23 <b>unsafe</b> 114:6,11,16 122:19,21 123:1 <b>unsupervised</b> 165:16 <b>unusual</b> 200:15 <b>upset</b> 55:24 93:7 110:8,8,9 121:3 166:21,23 169:10 175:3 195:1 201:25 <b>use</b> 12:18 13:4,13 32:16 169:22	170:5 202:24 219:24 <b>usually</b> 167:6 <b>utility</b> 168:24 <hr/> <b>V</b> <hr/> <b>va</b> 9:18,21 <b>vacant</b> 99:8 <b>vague</b> 25:15 49:7 49:24 58:6 68:10 96:11 120:23 158:23 160:8,20 164:8 185:14 196:17,24 200:16 <b>valarie</b> 111:7 118:9 <b>valerie</b> 153:4 <b>value</b> 39:3 <b>valued</b> 107:22 190:19 <b>various</b> 118:7 206:20 <b>verbal</b> 64:24 <b>verbally</b> 208:17 <b>versus</b> 170:20 209:1 <b>veterans</b> 56:22 57:3 205:3,9,12 <b>victim</b> 174:23 <b>victimize</b> 148:9 <b>victims</b> 133:25 <b>video</b> 72:1,3,5 73:1 73:13 77:1 91:21 203:13 <b>videos</b> 73:8 <b>view</b> 118:25 <b>viewed</b> 91:20 <b>violate</b> 183:8 <b>violated</b> 126:9 127:11 <b>violating</b> 153:1 <b>violation</b> 81:22 127:21 215:3 <b>violations</b> 126:14 126:18 <b>violence</b> 40:21 133:19 160:14 <b>violent</b> 36:20 41:13 130:25 133:5,22	134:1,2 167:2 177:19,19 <b>visible</b> 84:14 <b>visit</b> 140:3,11,20 143:11 144:6 147:7,9,21,23,25 148:2 214:14 <b>visitation</b> 139:15 <b>visited</b> 147:12 <b>visiting</b> 153:20 <b>visitor</b> 139:16 <b>visits</b> 148:6 <b>voice</b> 174:1 <b>vs</b> 1:9 <hr/> <b>W</b> <hr/> <b>w</b> 2:13,19 <b>wade</b> 197:5,10,13 197:16 198:7 <b>wait</b> 7:13 36:13 39:21 48:7 135:24 <b>waived</b> 157:13 <b>waiver</b> 155:7 157:19 <b>waiving</b> 215:8 <b>walgreens</b> 162:16 <b>walk</b> 20:25 174:8 211:1 <b>walked</b> 75:8 77:9 <b>walking</b> 7:6 <b>wall</b> 167:3 <b>want</b> 5:2 7:5,11,11 8:17 10:3,4 17:6 23:25 25:16 45:21 65:4 73:6 77:3 80:17 134:7 146:18 150:13 157:9 167:18,23 174:18 176:24 187:10 201:5 211:1,4 212:19 216:18 217:3 <b>wanted</b> 7:21 8:17 9:24 11:4,5 13:14 23:19 35:8 48:1 65:5,14,16 67:15 77:1,3 80:7 101:10 104:18	131:16 132:4 157:25 167:19,23 173:21 188:14 189:8 190:22 192:6 <b>wanting</b> 80:5 211:20 <b>warm</b> 124:19,21 <b>warning</b> 64:24 67:6 67:8 91:2 <b>warrant</b> 202:22 <b>warrants</b> 128:14 <b>washington</b> 9:13,16 9:17 <b>wasnt</b> 9:17 16:22 20:12 27:21 62:17 88:3 90:24 94:13 101:4 113:2 118:4 119:10 124:14 139:13 144:1 158:3 175:16 176:19 181:13 195:14,23 203:19 207:3 209:25 214:8 <b>waste</b> 149:15,18,18 <b>watch</b> 72:6,7,8 201:3 <b>watched</b> 84:11 203:16 <b>watching</b> 83:16 200:20 203:3 207:7 210:11 <b>watkins</b> 154:16 <b>way</b> 34:9 43:15 74:19 91:13 103:25 123:14 127:4 130:1 133:13 138:25 149:9 162:13 166:17,19 172:12 200:24 202:7 210:7 212:17 <b>weapon</b> 163:10,11 164:17 <b>weapons</b> 163:3,14 163:15 164:14 <b>weather</b> 124:19,21
--	---	--	--	---

<b>website</b> 50:4,4	90:19 96:6,12	8:7 9:20 18:19	<b>yea</b> 163:7	173:18 177:10
<b>wednesday</b> 169:14	104:25 106:2	20:15 21:13 28:15	<b>yeah</b> 13:11 38:9	182:15 184:3
<b>week</b> 72:2 103:9	111:19 119:7	39:4 69:15 95:20	72:22 101:4,6	185:11 187:21
<b>weekend</b> 79:1	120:3 134:22	107:20 108:2,7,13	110:4 113:11	194:4 196:19
<b>weeks</b> 167:17 195:4	136:3 137:7,14,19	126:8 127:9	119:16 123:24	198:23 205:16
<b>welfare</b> 11:1,14	138:6 143:15	142:17 161:9	127:10 139:8	208:23
17:12,16 31:20,25	144:14 148:6,20	164:10 191:16	148:20 157:5	<b>youve</b> 4:16 6:11
33:3,11,16 68:16	149:24 151:14	192:1	163:2 164:12	66:2 82:21 127:15
92:11,16 93:16	152:6 158:24	<b>working</b> 7:8 9:12	194:3 202:7,18	158:1 176:2
145:21	160:10,21 163:15	10:22 17:15 32:11	<b>year</b> 7:9,14 8:20,23	
<b>wellbeing</b> 24:24	164:9 177:1	50:7 95:13 129:10	9:3,5 11:16 12:1,5	<b>Z</b>
25:23 126:24	181:15 182:8,19	138:23 143:3	14:6 18:20 38:10	<b>zoo</b> 166:14
155:21	183:13 185:1,8,16	157:7 158:6	39:1,14 44:21	<b>zuniga</b> 111:8 118:9
<b>went</b> 6:25 7:4,15,16	186:3 192:16	189:24 190:21	52:7 65:25 94:10	
8:9,21 12:5,5 13:4	196:19 197:2	191:13 194:18	113:6 128:2	<b>0</b>
13:25 32:4,24	198:22 200:17	<b>workmen</b> 177:17	180:20 191:4	<b>00</b> 91:6 147:1
37:5,10,12 45:25	205:19 213:11	<b>workplace</b> 194:10	207:4 216:13	186:11,11,12,12
65:3,3 70:24 80:6	214:9 215:18	<b>works</b> 15:18 68:3	<b>years</b> 4:11 7:10,18	186:12,13
94:17 101:6	218:1,4 219:25	139:21 184:10	9:9,21,22 12:24	<b>07</b> 2:4
130:13 134:12	220:5,15	192:18	14:3,19 17:22,22	
135:11 169:13	<b>witnessed</b> 37:4	<b>world</b> 22:3	18:21 21:12 22:5	<b>1</b>
175:3,4 180:23	<b>witnesses</b> 177:25	<b>worried</b> 167:5,6	22:8 38:9,18 45:4	<b>1</b> 1:8 14:19 212:22
188:21,23 191:5	<b>women</b> 7:25	212:8 216:15	45:21 52:9 66:12	213:3 218:5
193:7	<b>won</b> 80:4	<b>worse</b> 160:5	66:24 78:4 108:12	<b>10</b> 41:9,9 186:11,12
<b>weve</b> 147:2 156:4	<b>wont</b> 194:8	<b>wouldnt</b> 5:12 46:12	123:24 130:4	<b>11</b> 7:7 189:21
<b>whats</b> 76:1	<b>woog</b> 194:1	139:19 178:18	142:18,25 190:21	<b>12</b> 3:8,8 74:2 91:6,6
<b>whereabouts</b> 6:20	<b>word</b> 30:3 70:23	204:7	193:7,8,11 197:24	121:9 186:12
<b>whereof</b> 220:15	175:24,25 183:15	<b>wow</b> 138:16	200:8 210:23,24	<b>120</b> 1:14
<b>whistleblower</b>	192:20	<b>wrap</b> 216:3	<b>yesterday</b> 73:2	<b>12cv00326blw</b> 1:8
55:23 200:10,12	<b>words</b> 115:25	<b>wrapped</b> 191:6	<b>youd</b> 177:20 216:22	<b>13</b> 1:18 2:4
200:25 207:1	126:21 180:5	<b>wrecked</b> 211:19	<b>youll</b> 28:24	<b>136</b> 3:7 82:19
<b>whos</b> 40:25	203:2	<b>write</b> 208:21	<b>young</b> 60:8 61:9,21	<b>137</b> 3:10 206:16
<b>wife</b> 190:8	<b>work</b> 5:5 6:25 7:1	<b>writing</b> 7:3 208:17	62:7 63:24 66:13	216:8
<b>wigging</b> 167:23	7:15,16,19 8:17	<b>written</b> 25:5 33:22	66:15 68:1 69:3	<b>14</b> 121:9
<b>willing</b> 166:3	9:2 11:13 12:12	37:21 64:21,24	70:23 76:3,14	<b>140</b> 39:3,4
<b>window</b> 67:15	13:20 14:23 15:23	67:6,8 91:2	78:21 79:21 80:12	<b>16</b> 41:9
<b>wish</b> 117:6	17:19 26:2,3 27:8	132:10 139:1	84:1,25 91:9,16	<b>18</b> 14:19
<b>witness</b> 13:25 14:17	34:9 36:25 51:3	178:8 196:14,22	92:14 136:25	<b>19</b> 31:5,5
16:10 19:17 24:19	66:21 80:6 100:7	<b>wrong</b> 22:11 28:22	165:18 173:7,20	<b>1965</b> 6:23
25:16 26:17 37:2	126:5,8 128:11	33:25 73:7 174:2	174:10,12,13,17	<b>1967</b> 7:7
39:22 41:3 44:9	131:6 132:10,23	195:7	174:19,20,21	<b>1977</b> 7:20 8:8
49:8 50:1 52:24	141:10 159:4	<b>wrote</b> 37:9 155:2,8	175:3,10,11,17	<b>1985</b> 8:8,23
53:4,14,17 54:13	166:3 177:3	175:19	176:1	<b>1990</b> 9:11
54:25 55:4,15	187:21 190:10,11		<b>youngest</b> 8:4	<b>1994</b> 11:15 14:11
58:7 59:6,25	194:21 195:9	<b>X</b>	<b>youre</b> 14:19 25:8	
61:19 68:11 77:13	197:24 204:6	<b>x</b> 3:1,5	32:6 36:17 50:10	<b>2</b>
80:19 81:2,8	209:25		67:3 81:14 83:9	<b>2</b> 14:19 83:4 147:1
88:12,23 90:1,12	<b>worked</b> 4:16 7:17	<b>Y</b>	109:10 156:8	147:5,5
				<b>20</b> 218:11,18



**2000s** 14:14  
**2007** 44:22  
**2008** 22:11 24:13  
**2009** 44:23  
**2010** 94:3,10  
 200:13,17,23,24  
**2011** 3:11 94:2 98:3  
 102:7 110:5  
 114:13 116:24  
 120:8 121:21  
 122:7 123:4  
 148:15 149:9  
 159:20 206:23  
 210:25  
**2012** 66:3 121:8  
 124:16 144:3,9  
 147:13,16,18  
 165:2 185:24  
 186:7 207:4  
**2013** 1:18 2:4  
 220:16  
**2019** 220:25  
**206** 3:10  
**21** 147:5  
**22** 214:3  
**220** 218:5  
**23** 214:3,4  
**23rd** 220:16  
**24** 72:2 214:4  
**250** 2:3,20  
**2636** 220:23  
**28** 220:25

**5**

**50** 189:21  
**50someodd** 190:21  
**55** 91:6 216:5  
**57** 216:5  
**58** 217:13  
**5th** 2:20

**6**

**6** 3:11,11 186:11,12

**7**

**7** 3:8 72:2  
**700** 2:3,20  
**710** 1:23 220:2,21  
**7426** 2:21

**8**

**8** 186:13  
**82** 3:7  
**837012636** 220:24  
**837025796** 2:14  
**837077426** 2:22

**9**

**9** 2:4 102:25 103:8  
 121:9,9  
**90s** 14:13  
**910** 2:13  
**93** 11:17  
**94** 11:17

**3**

**3** 189:21 193:24  
**30** 102:25 103:8  
**32** 41:9  
**358** 2:13  
**36** 23:8 214:24  
 215:4

**4**

**4** 3:3 70:13 189:21  
 216:5,5 217:13  
**43** 147:5  
**45minute** 23:13  
**4th** 69:1 70:20  
 90:15