

# EXHIBIT 4

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 LAURA ROTERS SEPTEMBER 16, 2013

REPORTED BY:

BEVERLY A. BENJAMIN, CSR No. 710, RPR

Notary Public

1 THE DEPOSITION OF LAURA ROTERS was taken on  
2 behalf of the Plaintiffs, at Anderson, Julian & Hull,  
3 250 South Fifth Street, Suite 700 Boise, Idaho,  
4 commencing at 9:19 a.m. on September 16, 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.

8 APPEARANCES:

9 For the Plaintiffs:  
10 Law Office of Andrew T. Schoppe, PLLC  
11 BY MR. ANDREW T. SCHOPPE  
12 910 W. Main Street, Suite 328  
13 Boise, Idaho 83702-5796  
14 For the Defendants Idaho Department of Juvenile  
15 Corrections, Sharon Harrigfeld, and Betty Grimm:  
16 Anderson, Julian & Hull, LLP  
17 BY MR. PHILLIP J. COLLAER  
18 C. W. Moore Plaza  
19 250 South 5th Street, Suite 700  
20 P.O. Box 7426  
21 Boise, Idaho 83707-7426

22 Also Present: Rhonda Ledford  
23  
24  
25

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5 EXHIBITS  
6 NO. DESCRIPTION PAGE  
7 None

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

5 EXAMINATION

6 QUESTIONS BY MR. SCHOPPE:

7 Q. Good morning. Thank you very much for coming.  
8 My name is Andrew Schoppe. I represent the Plaintiffs  
9 in this matter. Do you know who the Plaintiffs are?

10 A. I have a pretty good understanding of who they  
11 are.

12 Q. See if I can get them all right. We have  
13 Rhonda Ledford, Lisa Littlefield, Addison Fordham, Frank  
14 Farnworth, Tom de Knijf, Ray Gregston, Gracie Reyna, Kim  
15 McCormick, Jo McKinney, and formerly Diane Carnell.  
16 Those are names that are all familiar to you?

17 A. Sure.

18 Q. All right. I'm going to be asking you some  
19 questions today. I'm entitled to your best answer. I  
20 don't want you to guess. If you know something, please  
21 tell me the response. If you don't know something, by  
22 all means, let me know you don't know, or if you can  
23 remember, can't remember, things like that.

24 Have you ever had your deposition taken  
25 before?

1 A. No.  
 2 Q. Have you had a chance to speak with your  
 3 attorney here -- I don't want to know what you spoke  
 4 about -- just to prepare for what would be happening  
 5 today?  
 6 A. Yes.  
 7 Q. You understand that you are obligated to tell  
 8 the truth just as if you were testifying in a court  
 9 proceeding?  
 10 A. Yes.  
 11 Q. Is there anything that might negatively impact  
 12 your ability to testify this morning, like prescription  
 13 drugs, hangover, you name it?  
 14 A. No.  
 15 Q. Too tired?  
 16 A. No.  
 17 Q. Generally speaking, I'm looking for in your  
 18 responses anything you might know, even if you heard it  
 19 from somebody else. There may be some things that you  
 20 personally saw or heard or witnessed. There may be  
 21 things that you heard about from someone else. In this  
 22 case let's try to distinguish between what you know and  
 23 what you might have heard from someone else.  
 24 If there is any time that any of my questions  
 25 are unclear, confusing or anything like that, that will

1 happen, just let me know. If I ask you a question that  
 2 starts out with something like "is it fair to say," you  
 3 can tell me, Yes, it's fair to say that or correct me if  
 4 I'm wrong, say, No, that is not right, and correct me,  
 5 if that seems appropriate to you.  
 6 We can take a break any time you like, as long  
 7 as there is no question pending and you've answered  
 8 whatever my last question was. And again, generally  
 9 speaking, I don't want to know about anything you might  
 10 have discussed with your attorney here.  
 11 Can you tell me what you did to prepare for  
 12 today's deposition, if anything at all?  
 13 A. I met with the attorney last Thursday.  
 14 Q. Did you review any documents of any kind?  
 15 A. I think he showed me a police report when the  
 16 police came out, I think they were detectives that came  
 17 out, and they were going over incident reports and he  
 18 showed me that, and I reviewed it for about 45 seconds.  
 19 Q. What was the incident that the police came out  
 20 for?  
 21 A. I believe it was when Rhonda made the  
 22 accusation that incident reports were being -- I don't  
 23 even know what the accusation was. I think incident  
 24 reports were being changed or altered. So the officers  
 25 came out and did an interview. We spoke about it a

1 little bit on Thursday. He said, Here's the police  
 2 report, have you seen it? I said no. That was about  
 3 it.  
 4 Q. Do you know when that was, when that took  
 5 place?  
 6 A. Sometime in the last year, I didn't write down  
 7 the date.  
 8 Q. Had you been involved in that interaction with  
 9 the police at all or --  
 10 A. No. They just came out and talked to me once  
 11 and that was the last time I saw them.  
 12 Q. Do you know who you spoke with?  
 13 A. Two detectives.  
 14 Q. Do you know what law enforcement agency they  
 15 were with?  
 16 A. Nampa.  
 17 Q. Another general rule, you've been doing fine  
 18 thus far, is be sure to wait until I've asked the  
 19 question before you start your answer, that will give  
 20 your attorney an opportunity to object if he needs to,  
 21 and it also keeps things separate on the record. Be  
 22 sure you give an audible response like "yes" or "no,"  
 23 rather than "um-hmm" or something like that, because  
 24 it's impossible to read off the transcript later.  
 25 Can you tell me about your education. First

1 of all, stepping back further, where are you from?  
 2 A. I was born in Boise.  
 3 Q. Did you go through high school in Boise?  
 4 A. I moved quite a bit until 3rd grade, and then  
 5 in 3rd grade we stayed here and I went through high  
 6 school in Boise.  
 7 Q. After high school what did you do?  
 8 A. I went to BSU.  
 9 Q. What did you do there?  
 10 A. I attended college.  
 11 Q. For what?  
 12 A. I went for sociology, criminal justice, a  
 13 social science degree, and those were my two areas of  
 14 study.  
 15 Q. Did you receive a degree?  
 16 A. I did.  
 17 Q. What was that degree?  
 18 A. Social science with an emphasis on criminal  
 19 justice and sociology.  
 20 Q. Was that a BA, BS?  
 21 A. I believe it's a bachelor's of science.  
 22 Q. What year was that?  
 23 A. I graduated in December of 2000.  
 24 Q. Any education since that point?  
 25 A. Trainings, no formal college education since

1 then.  
 2 Q. What kind of trainings?  
 3 A. All kinds of trainings, I would have to pull  
 4 up my documentation to be able to tell you what kind of  
 5 training. I think I've attended the trainings, all the  
 6 regular scheduled trainings, and then I probably had 10  
 7 to 12 additional trainings.  
 8 Q. Are you talking about training specific to  
 9 Department of Juvenile Corrections?  
 10 A. Yes.  
 11 Q. After college what did you do next?  
 12 A. I worked. I was a waitress through college,  
 13 so I maintained being a waitress until I worked for the  
 14 Idaho Department of Juvenile Corrections.  
 15 Q. Where did you work?  
 16 A. During what time?  
 17 Q. When you were a waitress?  
 18 A. I started out at Crane Creek Country Club,  
 19 then I worked for Olive Garden, then I worked for  
 20 Sizzler.  
 21 Q. What time frame did you work at Crane Creek?  
 22 A. 1990-something, probably 1994, 1995, right  
 23 around there.  
 24 Q. Then how about Olive Garden?  
 25 A. Probably around '96.

1 Q. Until when?  
 2 A. I was there for a short time because I moved  
 3 over to Sizzler shortly after that.  
 4 Q. Then Sizzler 1996 until when?  
 5 A. Until I started with IDJC, so I was there for  
 6 five to six years.  
 7 Q. When did you start with the Department?  
 8 A. I believe it was January of 2002. It might  
 9 have been 2001, but I think it was 2002.  
 10 Q. How did you become aware of the opportunity to  
 11 work at the Department?  
 12 A. There was an Internet posting for the  
 13 position.  
 14 Q. What kind of jobs were you looking for?  
 15 A. Working with youth, I had done an internship  
 16 when I was in college as a probation officer, so I was  
 17 looking for jobs that were similar to that.  
 18 Q. What entity was that internship with?  
 19 A. Ada County.  
 20 Q. Any other internships like that?  
 21 A. No. I was with Ada County for two years.  
 22 Q. Was that continuous through the school year?  
 23 A. Yes.  
 24 Q. Was that as part of an educational requirement  
 25 or something you wanted to do?

1 A. I believe the educational requirement -- I  
 2 don't even know if it was a requirement, but it might  
 3 have been one semester, and I stayed on because they  
 4 gave me my own caseload, and I enjoyed what I was doing  
 5 and I was doing a good job.  
 6 Q. Who was your supervisor there?  
 7 A. I did diversion, EM, and probation. And so I  
 8 don't remember the diversion supervisor. I don't  
 9 remember the EM supervisor, and the probation supervisor  
 10 was Mark Disbennett.  
 11 Q. How do you spell that?  
 12 A. I think it's D-i-s-s-b-e-n-n-e-t-t. That is  
 13 my best guess.  
 14 Q. What kind of caseload did you have?  
 15 A. When I did diversion I had a caseload, I  
 16 believe, of 30 to 45 youth that I would work with. EM,  
 17 I was assigned with another EM officer and I would go  
 18 out with him. And probation I worked under Mark and  
 19 whichever youth he gave me to work on I worked with.  
 20 Q. When you say "youth," what kind of youth were  
 21 you talking about?  
 22 A. Youth on probation, ones that were part of the  
 23 Ada County court system.  
 24 Q. When they are on probation are any of them  
 25 incarcerated or are they out of any custody, for the

1 most part?  
 2 A. Some of them become incarcerated because they  
 3 have discretionary time and they might go to detention  
 4 for it if they are not following their probation terms  
 5 or diversion terms or EM terms.  
 6 Q. When you were in college did you have a  
 7 particular job goal?  
 8 A. I didn't initially, I wasn't quite sure what I  
 9 was going to do. And then I started doing the  
 10 internship and that is where I found an interest.  
 11 Q. Going back to the job posting that you found  
 12 on the Internet for the Department, what was the  
 13 position for?  
 14 A. Rehabilitation technician.  
 15 Q. How did the process go?  
 16 A. You apply for a position online. After they  
 17 score them at sometime they post your score online and  
 18 then they either choose to call you or not call you for  
 19 an interview.  
 20 Q. What did you hear back?  
 21 A. They called me for an interview.  
 22 Q. Who did you interview with?  
 23 A. I believe there were two people; one of them  
 24 was Dave Rohrbach and I believe the other was either Tom  
 25 Knoff or Jim Smutny. I don't remember which the second

1 was. It might have been Steve Emerson. I don't  
 2 remember the second person. It could have been him.  
 3 I'm not sure.  
 4 Q. How did that interview go?  
 5 A. I guess I don't understand the question.  
 6 There was an interview, we went through a series of  
 7 questions and answered the questions, they gave me a  
 8 tour, then I left.  
 9 Q. What kind of questions did they ask you?  
 10 A. I don't remember what questions they asked me.  
 11 Q. Following the interview when did you next hear  
 12 from the Department?  
 13 A. I don't know the time frame. I couldn't even  
 14 guess. I don't know if it was weeks or days or a month,  
 15 I have no idea.  
 16 Q. Less than six months?  
 17 A. I think so. I'm pretty sure it was less than  
 18 six months, because I was offered a position at some  
 19 time shortly after the interview, but I don't know the  
 20 time frame.  
 21 Q. Who did you hear back from, if you remember?  
 22 A. No.  
 23 Q. You don't remember?  
 24 A. I don't remember.  
 25 Q. When you were offered the position what

1 happened next?  
 2 A. I was given a start date, and then I came in  
 3 and we did several weeks of training. They were  
 4 starting a new unit so we started working on the unit.  
 5 Q. What was the new unit?  
 6 A. It was rehabilitation -- RPP. So it was a  
 7 Relapse Prevention Program.  
 8 Q. Who was the superintendent in charge of the  
 9 facility when you started?  
 10 A. It was a man. It was before Larry. I don't  
 11 remember his name.  
 12 Q. Could it have been Brent Reinke?  
 13 A. No, I think he was the director.  
 14 Q. About how long after you started did Larry --  
 15 I assume you mean Larry Callicutt?  
 16 A. Larry Callicutt.  
 17 Q. When did he start?  
 18 A. As superintendent?  
 19 Q. Yes.  
 20 A. I don't know. I didn't watch the time frame.  
 21 Q. Who was your supervisor when you first  
 22 started?  
 23 A. Dave Rohrbach.  
 24 Q. What was his title?  
 25 A. I don't know what his title was at that time.

1 I don't know if he was a unit manager or a supervisor or  
 2 a rehab supervisor, I'm not sure.  
 3 Q. What did you do as a rehab technician?  
 4 A. I worked with youth on the floor. At that  
 5 program, the RPP program, was youth coming in from other  
 6 programs that were getting ready to go back out into the  
 7 community, so we worked to reintegrate them.  
 8 Q. Where were those other RPP programs?  
 9 A. RPP program was only one program. The only  
 10 program was at Nampa. It was youth coming from other  
 11 State programs or other State beds were coming to the  
 12 RPP program to reintegrate back into the community.  
 13 Q. What do you mean by "other State beds"?  
 14 A. St. Anthony has State beds, Lewiston has State  
 15 beds, we have contract providers.  
 16 Q. Were you given a job description for the rehab  
 17 tech position?  
 18 A. I'm sure I was. The job description was  
 19 probably on the website when I applied for the position.  
 20 Q. As far as you know, has that job description  
 21 changed since then?  
 22 A. I do not know if it's changed.  
 23 Q. When you started who did you work with; who  
 24 were your fellow rehab techs?  
 25 A. There was Joe Bloom, he was one of the people

1 that trained me. I think there were four of us. There  
 2 was another male and a female. I don't know who they  
 3 were. I don't even remember, maybe there were five of  
 4 us initially. I don't know.  
 5 Q. Do you have any certifications other than your  
 6 college degree?  
 7 A. I am POST certified and I'm a POST certified  
 8 instructor. I'm a certified instructor for CPR and  
 9 first aid. And I don't think there is any other  
 10 certifications.  
 11 Q. What does it mean to be POST certified?  
 12 A. It means that you go through a process of  
 13 training, you take courses, you agree to a certain set  
 14 of standards. And then POST, which is the academy for  
 15 the police officers, recognizes you and certifies you as  
 16 a candidate that has met all the guidelines and the  
 17 standards and is doing what is expected and following  
 18 the practices that they expect of you.  
 19 Q. Are you a law enforcement officer?  
 20 A. No.  
 21 Q. How about appropriate use of force, are you  
 22 trained in that?  
 23 A. I am.  
 24 Q. When did you get your POST certification?  
 25 A. When I was a rehab tech. I would have to look

1 at the date. I don't know the date. It's been several  
 2 years.  
 3 Q. Is that something you did right away when you  
 4 became a rehab tech?  
 5 A. No, because the Department did not start  
 6 working towards POST certification for many years after  
 7 I was a tech. So when it was offered, I took the first  
 8 session, and the group of people -- there were a group  
 9 of us that went through that first process. And one of  
 10 the first processes, you were able to -- I don't know,  
 11 it's not grandfathered in, but you were able to do  
 12 different classes and different courses and meet  
 13 different standards to become certified.  
 14 Q. Do you recall who else you went through that  
 15 certification process with?  
 16 A. A dozen, give or take, people, so no. There  
 17 was a whole group of people.  
 18 Q. Other rehab techs that you worked with?  
 19 A. There might have been a unit manager, there  
 20 might have been supervisors, there might have been --  
 21 there was a different variance of the kind of people  
 22 that were going through the process.  
 23 Q. Is that something you have to keep up with or  
 24 renew or anything like that?  
 25 A. Once you are POST certified you have to

1 Q. So from about 2010 to about 2012?  
 2 A. That is a good guess.  
 3 Q. Was that its own position or was that a duty  
 4 that was sort of overlaid on another position?  
 5 A. It was its own position.  
 6 Q. Who did you report to?  
 7 A. The superintendent.  
 8 Q. Was that Betty Grimm?  
 9 A. That was Betty Grimm.  
 10 Q. Who had preceded you in that position?  
 11 A. That position was created sometime prior to it  
 12 being announced. It was created because there was a  
 13 headquarters position that was training that was  
 14 overseeing all three of the facilities. And then the  
 15 PbS position was being overseen by different people at  
 16 different facilities, so they created the position to  
 17 try and get some consistency for the position, I think.  
 18 Q. What did you do as PbS coordinator?  
 19 A. It was a PbS training, so it had both  
 20 dynamics. So for the PbS part you gather data, you  
 21 input data into a PbS website. I reviewed incidents. I  
 22 reviewed youth records. I worked with staff for  
 23 completion of youth records. We worked with the  
 24 national coordinator who came out to make sure that the  
 25 data, the quality of the data was good. And then we

1 maintain the standard. You can be decertified. And if  
 2 you quit the Department or you quit as the agency,  
 3 because it's only for the Department of Juvenile  
 4 Corrections that the POST certification is good for, and  
 5 I believe you have three years, and after three years I  
 6 think you have to go through another process to be  
 7 recertified.  
 8 Q. How about for appropriate use of force  
 9 certification?  
 10 A. Every six months to maintain certified.  
 11 Q. Have you ever become decertified in either of  
 12 those?  
 13 A. Not as a POST certificate. But for AUF, when  
 14 my job has not required me to be AUF certified, I was  
 15 not AUF certified.  
 16 Q. When was that?  
 17 A. When I was the PbS training coordinator. I  
 18 was probably certified my first six months, because it  
 19 would have followed me from being a tech, but after that  
 20 I did not stay up with the training.  
 21 Q. What was that time frame that you were the PbS  
 22 coordinator?  
 23 A. I would have to look at my employment history,  
 24 but it was approximately three years ago until last  
 25 year. So there was a two-year time span, give or take.

1 worked with supervisors within the building to create  
 2 facility improvement plans. We monitored facility  
 3 improvement plans.  
 4 And then for the training aspect we worked  
 5 with a POST trainer, who was Marcy Chadwell, to create  
 6 curriculum for the POST courses that staff took. We  
 7 worked to get people through the POST process and  
 8 certification process, monitored documentation for the  
 9 POST process, ensured that trainings were occurring in  
 10 the facilities, that people were staying accurate on  
 11 their trainings -- not accurate, but up to date. Made  
 12 sure the classes were being taught, made sure that we  
 13 had certified instructors.  
 14 Q. That position was located at the Nampa  
 15 facility?  
 16 A. Yes.  
 17 Q. How was data gathered?  
 18 A. Data is gathered twice a year, in April and  
 19 October. So every incident that occurs during that  
 20 month is collected, and then the youth records for all  
 21 of the youths that leave the facility within six months,  
 22 between those six-month periods, it's maintained on our  
 23 Intranet -- not Intranet, I don't even know.  
 24 The IDJC data home is where it's kept, the  
 25 youth records are kept in their own PbS form. The group



1 leaders have access to put the information in.  
 2 What was your question? Let's see if I can  
 3 answer it. Give me your question again.  
 4 Q. How was data gathered?  
 5 A. Then once all of the youth records are in  
 6 there, all of the incident reports are in there, I would  
 7 pull the logs, I would look at youth records, and I  
 8 would collect all the incident reports as they occur on  
 9 a daily basis. We would keep track of them. I would  
 10 have to print off every IR that was written. And then  
 11 you create a great big file that has all of the  
 12 information in it, and then you take all of that data  
 13 and enter it into the PbS website.  
 14 Q. Is the system you are talking about IJOS?  
 15 A. Some of it is IJOS, but the youth records  
 16 aren't kept under IJOS. The information comes from  
 17 IJOS, but it's kept under its own PbS area.  
 18 Q. When you mentioned working with a national  
 19 coordinator, was that a representative from CJCA?  
 20 A. It is CJCA. It's PbS, which I believe is  
 21 associated with CJCA.  
 22 Q. Do you remember who that was?  
 23 A. Tom Turos.  
 24 Q. Is that T-u-r-o-s?  
 25 A. We can go with that.

1 And then the youth surveys, there are 30  
 2 surveys that are given out to the youth for each area.  
 3 And those are given by either the PbS site coordinator  
 4 or one of the OS2s.  
 5 Q. What is an OS2?  
 6 A. Office specialist.  
 7 Q. Who are the office specialists?  
 8 A. All of them?  
 9 Q. The ones who might have been involved with  
 10 PbS.  
 11 A. Bobbi Rogers was usually the one that was most  
 12 involved because she helped with the coordination of PbS  
 13 prior to the position being created.  
 14 Q. Anybody else?  
 15 A. There surely could have been someone else, but  
 16 I don't remember.  
 17 Q. In addition to those two types of surveys, are  
 18 there any other kind of surveys that staff or juveniles  
 19 can use in connection with PbS data gathering?  
 20 A. We did a few surveys when the data came back  
 21 and showed that either the staff were fearful or the  
 22 youth were fearful of safety. We created internal  
 23 surveys that were put out to try to determine why they  
 24 had a fear for safety, so that we could create facility  
 25 improvement plans to focus in those areas.

1 Q. When was it that you worked with him?  
 2 A. For the two years I was in the position as the  
 3 PbS training coordinator.  
 4 Q. After you left that position who took your  
 5 place?  
 6 A. Lamark Judkins.  
 7 Q. As far as you know, is that still his  
 8 position?  
 9 A. Yes.  
 10 Q. What is a PbS survey?  
 11 A. A PbS survey, there is a youth survey and a  
 12 staff survey, and the surveys are generated by PbS. So  
 13 you go onto their website and you print the survey off.  
 14 They are handed out to the staff usually by supervisors,  
 15 if not, by the site coordinator, depending on when the  
 16 people worked. And there are 30 surveys that are given  
 17 out for each facility.  
 18 And our facility at the time, the Nampa  
 19 facility, was broken into three facilities: The  
 20 Observation and Assessment, Choices, and Solutions. So  
 21 they all three had their own surveys. So 30 of their  
 22 staff would be given them. They include SSOs, kitchen  
 23 staff, teachers, nurses, anyone who might have contact  
 24 with the youth pertaining to that area. And people were  
 25 assigned different areas.

1 Q. When was it that those fears for safety were  
 2 discovered?  
 3 A. I think fear for safety has always been on  
 4 there, on the PbS data information. I would have to  
 5 look at the data to tell you. If you are asking  
 6 particular times when it was high or low, I would have  
 7 to look at the data.  
 8 Q. Was there a particular time frame you had in  
 9 mind just now when you were giving that response?  
 10 A. The two years I was a PbS coordinator we  
 11 worked in those areas.  
 12 Q. How is it that staff or juveniles express fear  
 13 for safety, a check box kind of thing or is it a fill in  
 14 the blank?  
 15 A. It's a check box.  
 16 Q. What kinds of check boxes are there?  
 17 A. For fear for safety?  
 18 Q. Yes.  
 19 A. I think that is the only check box: Have you  
 20 feared for your safety in the last six months? Yes or  
 21 no.  
 22 Q. In crafting those internal surveys that you  
 23 just mentioned, what kinds of responses did you get?  
 24 A. The questions that were asked were questions  
 25 pertaining to: Did you fear for your safety responding

1 to incidents? Did you fear for your safety due to lack  
2 of training? Did you fear for your safety due to lack  
3 of staff assistance? So there was a whole series of  
4 questions. So the responses that we got varied  
5 depending on the questions and the areas.

6 Q. In reviewing those responses, were you able to  
7 figure out what was causing the fears for safety in the  
8 staff?

9 A. I think the majority were responding to codes  
10 and incidents where a person was not assigned to work  
11 caused discomfort.

12 Q. What do you mean by "not assigned to work"?

13 A. So if I'm a rehab tech assigned to work in the  
14 Choices program and I'm responding to a misbehavior or a  
15 code either in the Solutions program or the O&A program,  
16 that would increase my fear for safety.

17 Q. How about for juveniles?

18 A. The juveniles, I don't know that we did an  
19 internal with the juveniles. That was different. I  
20 would have to go back and look.

21 Q. Are those internal surveys anonymous?

22 A. They are anonymous.

23 Q. Was there a reason that it was decided to keep  
24 those anonymous?

25 A. Because the process through PbS is anonymous.

1 Q. On those surveys is there an option for  
2 "other," for example, something that didn't fall under a  
3 predefined category?

4 A. I think there are in some sections. I don't  
5 believe there is one for fear for safety. I would have  
6 to look at the form again to be certain. I also know  
7 they update the form every six months, so we would have  
8 to look at the form from the current time.

9 Q. As far as you know, was all the, or at least  
10 during your time as the PbS coordinator, was all the  
11 data that was recorded on these forms entered into the  
12 PbS system?

13 A. It was. With the forms, the youth and the  
14 staff have the option of marking "yes" or "no" that they  
15 will participate or won't participate. If you mark  
16 "no," then anything that you write on there is not  
17 added. So it has to be a "yes, I agree to participate."

18 Q. Participate in the data gathering?

19 A. In the completion of the survey.

20 Q. What is involved in the completion of the  
21 survey?

22 A. Answering the 30, give or take, answers and  
23 then putting it into an envelope and then turning it in.

24 Q. Were staff asked to sign in on a sign-in sheet  
25 as they turned in surveys?

1 A. They were for tracking, because you have to  
2 have 30 surveys for each area. And so they were given  
3 an anonymous box to put their envelopes into, but you  
4 had to be able to track whether it was O&A, Solutions,  
5 or Choices for the survey so you could add the data to  
6 PbS in the accurate area. And that check-off was, let's  
7 say I had 30 people on there and only 27 had completed  
8 the form, I wouldn't know who the last three were  
9 without a check-off, so I would send them e-mails asking  
10 them to please complete their surveys and turn them in  
11 by the end of the reporting period, because you only  
12 have 30 days. You can't collect surveys after or before  
13 the time period.

14 Q. If only a couple surveys were turned in to the  
15 box at any given time, is it possible to know who had  
16 turned them in based on the sign-in sheet?

17 A. I didn't monitor the sign-in sheet that way.  
18 That wasn't the purpose, so it wasn't utilized that way.

19 Q. Would you still be able to tell who had done  
20 it though?

21 A. If every day you wrote down exactly who was  
22 turning them in and every day you checked it numerous  
23 different times to try to figure out who people were you  
24 might be able to, but I don't understand the purpose of  
25 that. It would be a difficult and time-consuming

1 process to try and figure that out.

2 Q. When were performance-based standards first  
3 implemented at the Department?

4 A. I don't know the exact date, but I think we  
5 have been utilizing them for over ten years.

6 Q. What role did those play in developing  
7 Department policy?

8 A. I don't know that they spend too much time on  
9 Department policy. The purpose of PbS is to look into  
10 your own facility and look at the goods and the bads,  
11 and recognize the goods and try to improve on some of  
12 the areas that need improvement and work with best  
13 practice. PbS focuses on best practice nationwide and  
14 they help guide you if there is areas of concern.

15 Q. You've indicated that the position for PbS  
16 coordinator had been developed in part with Bobbi  
17 Rogers. Prior to that what was the name of -- was there  
18 a title for someone in the facility that sort of  
19 monitored PbS? How did it work before the position  
20 existed?

21 A. I don't believe that I said Bobbi Rogers  
22 helped develop it. I think she helped collect data.  
23 And it was assigned to -- at our facility it was  
24 assigned to the nursing manager. Prior to that I don't  
25 know who did it. And it was just a task that was



1 assigned to different positions.  
 2 Q. Before you became PbS coordinator and those  
 3 responsibilities shifted on to you, who had borne that  
 4 responsibility; was it the nursing manager?  
 5 A. It was the nursing manager, I believe. I  
 6 don't know for sure, but I'm pretty sure it was the  
 7 nursing manager. I don't know if there was a time frame  
 8 between the nursing manager and me or someone else was  
 9 in charge, I don't know.  
 10 Q. Who was the nursing manager at that time?  
 11 A. I don't know. I don't remember her name. I  
 12 can see her face, but I don't remember her name. I  
 13 don't know. We would have to go through HR to find out.  
 14 Q. Is that somebody who still works there?  
 15 A. No.  
 16 Q. As far as you know, does PbS, the data that  
 17 goes up to CJCA or the PbS organization, does that have  
 18 any influence on how the Department gets funded?  
 19 A. I don't believe it does, but I don't know. I  
 20 believe we pay them, we actually pay them quite bit of  
 21 money to utilize them for best practices.  
 22 Q. Do you know about how much?  
 23 A. I don't.  
 24 Q. As far as you know, is there any kind of a  
 25 ranking system for entities that use PbS?

1 A. A ranking system comparing them to what?  
 2 Q. Other similar facilities.  
 3 A. Every six months you go through each of the  
 4 questions that are answered in the PbS, the website  
 5 actually ranks you with the other facilities nationwide  
 6 that are participating in PbS, so you can see if you are  
 7 meeting the standard or above the standard or below the  
 8 standard for national accountability, I think.  
 9 Q. What kind of categories are there that are  
 10 measured?  
 11 A. Numerous categories that are measured. I  
 12 believe there is probably 15 to 30 different questions  
 13 that are measured in 10 to 15 different categories, so  
 14 there is a significant amount.  
 15 Q. Anything that you can recall right at the  
 16 moment?  
 17 A. Any categories?  
 18 Q. Yes.  
 19 A. Like what they would be called?  
 20 Q. Right.  
 21 A. They have safety, they have programming, they  
 22 have reintegration, there is health, and I know there is  
 23 more. Recreation, I don't know if the schooling,  
 24 schooling is recognized. That is what I can recall.  
 25 Q. Is PbS data reported to the Department of

1 Justice or to the Office of Juvenile Justice and  
 2 Delinquency Prevention?  
 3 A. I don't know.  
 4 Q. Are you familiar at all with the system or  
 5 data system called DCTAT?  
 6 A. No.  
 7 Q. Do you know who is responsible for reporting  
 8 information to the Department of Justice or the OJJDP  
 9 regarding use of federal funds or grants or anything  
 10 like that?  
 11 A. No.  
 12 Q. Is recidivism measured under PbS?  
 13 A. There is a box where you -- I'm going to say I  
 14 don't know, because I would have to look at it.  
 15 Q. That's okay. As PbS coordinator were you  
 16 solely responsible for putting all that data, all the  
 17 PbS data that is going to be reported to the PbS  
 18 organization into its final form?  
 19 A. "Into its final form," what do you mean by  
 20 that?  
 21 Q. For example, when you pull all the data  
 22 together, is it pulled together first in kind of draft  
 23 form, then reviewed and sent up, or is it just fed in  
 24 piecemeal? How does it work?  
 25 A. I feed it into the computer and PbS creates

1 the reports for it.  
 2 Q. Do you gather all of the relevant data into  
 3 one central sort of spreadsheet or something like that?  
 4 A. No. I gather all the data and keep it in a  
 5 binder, and then put it all into the computer. There is  
 6 a series of questions and there is several people that  
 7 help. IJOS helps, they pull a series of questions. HR  
 8 helps, they pull a series of questions, because you have  
 9 to document staff hours. Some of the OS2s, mainly Bobbi  
 10 Rogers or Maria Ferrara would help enter data, because  
 11 it's a very time-consuming process. I think that's it  
 12 for gathering data.  
 13 Q. Who at IJOS would help with that?  
 14 A. Lindsay Anderson would help the majority of  
 15 the time. I believe there is a team of people on the  
 16 IJOS help desk that have the ability to gather data.  
 17 Q. Once it's all gathered and before it's  
 18 submitted is it reviewed by anyone?  
 19 A. PbS creates a draft form that you can look at  
 20 to ensure all the data is inputted accurately. If there  
 21 is a red flag, something that seems totally off, they  
 22 will send you information saying, This is an area that  
 23 looks really weird. A lot of times it has to do with  
 24 inaccurate data entry.  
 25 So on a youth record if I accidentally put

1 like an a.m. time or a p.m. time, it would show that the  
2 youth was there for 12 hours or that the incident had  
3 happened 14 hours prior to the date. So it would send  
4 inaccuracies or errors or areas that might be inaccurate  
5 if I have an error in back for review. And we would  
6 either look at the data and make a change if was it  
7 necessary or say no, that is accurate data, it's just  
8 how it was documented.

9 Q. How about before the data gets to PbS at all,  
10 is there anybody who reviews it before that point?

11 A. The youth records are reviewed to ensure that  
12 they were completed by the PbS coordinator, because they  
13 have to be totally complete and accurate to the best of  
14 the ability by the person putting the information in  
15 prior to the data collection, because you have to have  
16 all the information for input. So those are reviewed.

17 When I was the PbS coordinator I reviewed  
18 incident reports as a final approver. After they had  
19 been submitted to supervisors, they would come through  
20 me and then go through the superintendent.

21 Q. The incident reports would come from the  
22 supervisor, go through you and then to the  
23 superintendent?

24 A. Correct.

25 Q. What would the superintendent do?

1 A. In the current process for incident reports  
2 there is a series of checks or signatures that occur to  
3 close the incident report, and it needs a final  
4 signature from the superintendent to close it.

5 Q. Does that mean finalize it more or less?

6 A. Finalize it, complete it, yes. Can't access  
7 it, it's done, it's closed, can't change it.

8 Q. As a rule, are all incident reports entered  
9 into this data gathering process?

10 A. For PbS or IJOS?

11 Q. PbS.

12 A. PbS, it's only for the month of the recording  
13 period. So the month of April or the month of October,  
14 all incidents that occurred during that time frame are  
15 entered into IJOS. And there is a series of reportable  
16 incidents and nonreportable incidents. So they have to  
17 meet criteria of PbS reportable incidents for them to be  
18 entered into the PbS website.

19 Q. What is reportable and what is not?

20 A. Information that is not reportable are youth  
21 that are on sick bed, youth that lock themselves down  
22 like a self-isolation. I think that's it. Everything  
23 else is reportable.

24 Misconduct wouldn't be reportable unless it  
25 created a restraint or room confinement. But there is

1 definitions on the PbS website that explain exactly what  
2 is reportable and not.

3 Q. Of the reportable data, have there ever been  
4 any exceptions to anything that might have been left out  
5 in terms of incident reports or any information like  
6 that?

7 A. Reportable data is all entered.

8 Q. Stepping back to what you said the  
9 superintendent's role was, was that specific to PbS or  
10 IJOS?

11 A. All incident reports are reviewed by the  
12 superintendent and the signature from the superintendent  
13 is needed to close all incident reports, regardless if  
14 they were reportable or not.

15 Q. With respect to your time as a rehab tech in  
16 the facility, how long did you work in that position?

17 A. Seven-plus years.

18 Q. In that time who was your supervisor?

19 A. Dave Rohrbach was my supervisor and Joe Bloom  
20 was my supervisor. Jim Smutny I think was my supervisor  
21 also for a time.

22 Q. What was the name of the unit?

23 A. Relapse Prevention Program is where I was my  
24 first two years, and then I worked in the Choices  
25 program for about five years, give or take.

1 Q. Did your duties differ between those two  
2 units?

3 A. The rehab technician duties did not differ.  
4 The programs themselves and the focus was different, but  
5 the duties were the same.

6 Q. What is the focus of Choices?

7 A. Choices was working with 36 males, youth, that  
8 had been committed to the Department, and then working  
9 on problem behavior areas, teaching new skills, teaching  
10 ability to function in the community, be healthy in the  
11 community, work with one another, working on care and  
12 concern for each other, looking at making amends, taking  
13 accountability for your behavior, work with families,  
14 working on drug and alcohol, programmatic skills, life  
15 skills, social skills. And they went through education,  
16 trying to get them back to where they need to be  
17 education-wise, so when they go back into the community  
18 they can rejoin schooling.

19 Q. How does Choices differ from Solutions in  
20 terms of focus?

21 A. The criteria for Choices is drug and alcohol  
22 and conduct disorder. And the criteria for Solutions is  
23 a mental health diagnosis, and yes or no to drug and  
24 alcohol. It's not an all or nothing. If they have one,  
25 they get the programming for it. If they don't, then

1 they get other programming during that time.  
 2 Q. How is the decision made as to which of those  
 3 two units that any given juvenile might go?  
 4 A. The youth when they are in O&A, they go  
 5 through a series of assessments and testing. They have  
 6 a staffing, and then after the staffing, the treatment  
 7 team along with the clinical supervisor works to find  
 8 the best placement for you.  
 9 Q. So O&A is the first stop?  
 10 A. It is.  
 11 Q. Who is responsible for testing and assessing?  
 12 A. Clinicians.  
 13 Q. When you say "clinicians," are those also  
 14 rehab techs?  
 15 A. No. The clinicians complete the testing that  
 16 the youth do. The rehab techs, I wouldn't say do  
 17 assessments, but what they do is they watch the  
 18 behaviors during the time that the youth is in O&A and  
 19 they document that. And then during the staffing some  
 20 of the behaviors are brought to light and the staffing  
 21 is spoken to, so that as the youth goes through that  
 22 process, we have a good idea of how they react to  
 23 different scenarios.  
 24 Q. Are those clinicians like LCSWs?  
 25 A. I don't know their credentials.

1 Q. As far as you know, are juveniles always  
 2 assigned appropriately based on their testing and test  
 3 results and things like that?  
 4 A. I don't know. They go to programming, they do  
 5 their programming, and if it works out that's great. If  
 6 not, then whomever their treatment team is, looks at it  
 7 to see if they need to be assigned someplace else.  
 8 Q. Stepping back to PbS data gathering and  
 9 reporting, as far as you know, were any changes made to  
 10 the manner in which data was gathered after Director  
 11 Harrigfeld was appointed?  
 12 A. I don't believe so. I wasn't in the PbS  
 13 position the years prior. I don't know how it was  
 14 selected prior to Sharon Harrigfeld.  
 15 Q. Were you aware of any changes in how the data  
 16 was reported after Director Harrigfeld was appointed?  
 17 A. No.  
 18 Q. So as I understand it, you had worked with the  
 19 RPP program for about two years and then Choices for  
 20 five years. Where did you go after Choices?  
 21 A. PbS training coordinator.  
 22 Q. You said you thought that was about 2010; is  
 23 that right?  
 24 A. I believe that is accurate. We would have to  
 25 look at data or the HR information or employment

1 reports. I don't have the exact date.  
 2 Q. How was it that you came to make that move?  
 3 A. Application went out online and I applied for  
 4 the position.  
 5 Q. Are you aware of anyone else having applied?  
 6 A. I think several people applied.  
 7 Q. Do you know who?  
 8 A. I don't know who.  
 9 Q. How did the process go after you made your  
 10 application?  
 11 A. After you apply online, whoever grades them  
 12 grades the test, they put the scores online so you can  
 13 see your own score, and then they create an interview  
 14 list. They interview candidates and then they hire  
 15 someone.  
 16 Q. Do you know who is responsible for the  
 17 scoring?  
 18 A. No. Whoever is assigned -- there is a subject  
 19 matter expert who usually scores exams, but I don't know  
 20 who they would be.  
 21 Q. You were then interviewed; is that right?  
 22 A. I was.  
 23 Q. Who interviewed you?  
 24 A. I have no idea. I think Marcy Chadwell,  
 25 because she was the training coordinator at POST and

1 someone we would be working close with. I don't  
 2 remember if Betty was in the interview process or not,  
 3 because they would be supervised by Betty, so that would  
 4 be logical. I don't know if an HR person was there. I  
 5 don't remember.  
 6 Q. Then fair to say that an offer was extended to  
 7 you to take the position?  
 8 A. It was.  
 9 Q. Was it a pay raise?  
 10 A. From a rehab tech position it was.  
 11 Q. Did anyone take your position as a rehab tech  
 12 after you left?  
 13 A. I'm sure they did. There is the same number  
 14 of rehab techs.  
 15 Q. About how many rehab techs were there when you  
 16 left?  
 17 A. I think the Choices program runs, I think at  
 18 the time there they were running with 18, 6 in each of  
 19 the areas or units or pods or whatever you might want to  
 20 call them.  
 21 Q. At some point you left the PbS coordinator  
 22 position; is that right?  
 23 A. I did.  
 24 Q. How did that come about?  
 25 A. An announcement went out for a different

1 position, a position as a unit manager, and I applied  
 2 for the position.  
 3 Q. That was a unit manager where?  
 4 A. It was a unit manager over programs, so it  
 5 would have been over Choices and Solutions.  
 6 Q. Do you recall seeing a job description for  
 7 that?  
 8 A. There was a job description that was part of  
 9 the application.  
 10 Q. As far as you recall, did that job description  
 11 require previous supervisory experience?  
 12 A. It required some previous supervisory  
 13 experience.  
 14 Q. Did it say how much?  
 15 A. I would have to look at the application.  
 16 Q. Did you have prior supervisory experience?  
 17 A. The definition or the way it was described  
 18 allowed for a person who had been left in charge in  
 19 their current role for, I think it was six months  
 20 unconsecutive as a lead, per se, being responsible when  
 21 the supervisor was out, and I had that experience. I  
 22 also had experience in prior positions where I was the  
 23 lead when I waited tables.  
 24 Q. The first one that you mentioned, where you  
 25 had been left in charge as a lead somewhere, where was

1 that?  
 2 A. In RPP and in Choices.  
 3 Q. In RPP was there a lead position or kind of  
 4 main supervisory position?  
 5 A. The main supervisory position would have been  
 6 the supervisor who supervised all the techs. There  
 7 wasn't a formal lead position. But the way that the  
 8 schedule was created, there was a designee of the person  
 9 who was in charge, and it was designated I think by an  
 10 asterisk, whenever the supervisor was out and that would  
 11 be the person that others went to for direction and  
 12 advice.  
 13 Q. Who was that supervisor when you were in RPP?  
 14 A. Dave Rohrbach was the supervisor over the  
 15 rehab techs.  
 16 Q. Do you know how that asterisk that you just  
 17 mentioned, how it was determined who would be assigned  
 18 to that position in Mr. Rohrbach's absence?  
 19 A. It rotated.  
 20 Q. Based on seniority or anything like that?  
 21 A. No.  
 22 Q. It was up to him?  
 23 A. I believe he made the schedule, yes.  
 24 Q. Was it up to him to designate who would be  
 25 lead in his absence?

1 A. No. I believe that the rotation had four or  
 2 five weeks in a rotation, and the one with the asterisk  
 3 I believe was always the same. And as it rotated out,  
 4 as you rotated through it, you were the person that was  
 5 left in charge during those times.  
 6 Q. So it could be everybody.  
 7 A. Yes, everybody who worked at that time.  
 8 Q. How about with respect to the Choices?  
 9 A. The Choices program, Jim Smutny and Joe Bloom  
 10 were both supervisors of mine during that time. And  
 11 they would send e-mails to me requesting that I take the  
 12 lead when they were on vacation or out. I created the  
 13 schedules for the Choices program for a significant  
 14 amount of time, and that was part of the expectation.  
 15 Q. Anyone else ever fill that role as far as you  
 16 recall?  
 17 A. I don't recall.  
 18 Q. After your interview were you offered the  
 19 position?  
 20 A. I was.  
 21 Q. Again, was this for unit manager of programs?  
 22 A. Unit manager of programs, I was offered the  
 23 position, yes.  
 24 Q. Who made that offer to you?  
 25 A. Dave Rohrbach.

1 Q. When was that?  
 2 A. I don't have the date.  
 3 Q. Sometime in 2011?  
 4 A. I don't have the date. I would have to look.  
 5 Q. When did you start working in the position?  
 6 A. I did not start working in that position.  
 7 Q. Why not?  
 8 A. Because the offer was rescinded.  
 9 Q. Why was that?  
 10 A. There was an HR decision that question No. 2  
 11 on the exam was worded inappropriately and needed to be  
 12 rewritten to be able to be answered with more clarity.  
 13 Q. Did someone explain that to you?  
 14 A. Julie Cloud explained that to me.  
 15 Q. What was the question that needed to be  
 16 rewritten?  
 17 A. Question 2 pertained to training and  
 18 supervision.  
 19 Q. How so?  
 20 A. I don't remember the question exactly, but it  
 21 asked about supervisory experience and it asked about  
 22 training experience. And I had trained for the facility  
 23 for several years, and I was a POST certified trainer,  
 24 and I had been the training coordinator, so I was able  
 25 to answer that question with a significant amount of



1 information. And then it asked about supervisory  
 2 experience, and I answered that question similar to how  
 3 I just gave you my information.  
 4 Q. Do you know why this came up as an issue?  
 5 A. Because Freckleton called and questioned it.  
 6 Q. How do you know that?  
 7 A. Because he told me.  
 8 Q. What did he tell you?  
 9 A. He told me that he called -- that Mark  
 10 Freckleton told me that he called the human resource  
 11 office and asked them how he didn't pass the test.  
 12 Q. What did he say next?  
 13 A. That was pretty much it. He said that he had  
 14 called and questioned why he didn't pass the test when I  
 15 did, and he apologized for what happened, said that  
 16 wasn't his intention. He just wanted to understand. He  
 17 and I talked a little bit about answering the questions  
 18 completely. I asked him if he answered each question  
 19 completely. I told him that when you answer the  
 20 questions, even if they are similar, you have to answer  
 21 them in full each time. You can't just assume that they  
 22 are going to take information from a different question.  
 23 And that might have been what happened in his case, I  
 24 didn't really know, and we moved on.  
 25 Q. When you say "passed the test," do you mean

1 didn't get the interview, why he didn't pass the exam.  
 2 Q. Do you know if he ever got an answer?  
 3 A. I don't know.  
 4 Q. How was it that the offer was rescinded?  
 5 A. The offer was rescinded. I was asked to meet  
 6 with Julie Cloud and Betty Grimm, I don't know the date,  
 7 in their office prior to the start date of the position.  
 8 We met and they explained that there was an error in the  
 9 exam and that they would have to rescind the position.  
 10 Q. With respect to the error they were talking  
 11 about, I know you testified about that just a little bit  
 12 ago. As far as you know, did it boil down to lack of  
 13 clarity in the question?  
 14 A. In question No. 2.  
 15 Q. How did you respond to what they had to say  
 16 about rescinding the offer?  
 17 A. I was upset. I was frustrated. I'm sure  
 18 there were a lot of tears. I was confused. And I think  
 19 that was it.  
 20 Q. Before you had applied for the PbS coordinator  
 21 position, had anyone suggested to you that you should  
 22 apply for that?  
 23 A. Betty had said that there is a position for  
 24 PbS and training coming out, that I had been a trainer  
 25 for the Department for some time, and if I had the

1 the initial screening process for who is eligible to  
 2 apply or not?  
 3 A. No. Anyone can apply for a position. Once  
 4 you apply for the position online, the subject matter  
 5 expert goes through and grades all the exams, and you  
 6 either get a passing score or a failing score.  
 7 Q. Then as far as you understand it, it's from  
 8 the passing group that interviews may be requested or  
 9 offered?  
 10 A. Yes.  
 11 Q. And Freckleton didn't pass that step?  
 12 A. That is what he shared with me, that he had  
 13 not passed that step.  
 14 Q. Are you are aware of any other applicants for  
 15 that position?  
 16 A. I know that Eric Cotton applied and  
 17 interviewed. I think there were others. I think Nick  
 18 Tinker applied and interviewed. And I don't know the  
 19 others.  
 20 Q. Did anyone raise the issue of having more  
 21 supervisory experience than you did at that time?  
 22 A. Not to me, no.  
 23 Q. Did you hear something about that?  
 24 A. I believe the only person that referenced that  
 25 was Mark Freckleton when he was questioning why he

1 interest I should apply. If not, so be it. I was good  
 2 at what I did.  
 3 Q. Do you know if she encouraged anyone else  
 4 to apply?  
 5 A. I don't.  
 6 Q. Did you speak with Julie Cloud about applying  
 7 for the position?  
 8 A. Which position?  
 9 Q. The unit manager.  
 10 A. No.  
 11 Q. When you met with Ms. Cloud and Ms. Grimm,  
 12 apart from the upset and the tears and confusion, was  
 13 there anything specific that you discussed with them?  
 14 A. I believe my focus was what had happened, what  
 15 had occurred, because I was unclear, I didn't  
 16 understand. So that was the focus of our conversations.  
 17 Q. After that did you simply keep doing what you  
 18 had already been doing?  
 19 A. I went back to the PbS training coordinator  
 20 position.  
 21 Q. As far as you know, had they already tasked or  
 22 assigned someone to take over those duties?  
 23 A. For which duties?  
 24 Q. For PbS coordinator.  
 25 A. No, it hadn't -- I don't believe the position



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1 had been announced yet.  
 2 **MR. SCHOPPE: It's about 10:30, should we take**  
 3 **a break?**  
 4 **MR. COLLAER: Sure.**  
 5 **(Recess taken from 10:30 to 10:49 a.m.)**  
 6 **Q. (BY MR. SCHOPPE)** We were talking about how  
 7 you had applied for the unit manager position over  
 8 programs. You had discussed the revocation of the offer  
 9 with Ms. Grimm and Ms. Cloud. Did you do anything to  
 10 dispute or contest the decision to revoke that offer?  
 11 **A.** I did. Not to dispute, more seeking  
 12 clarification. I called the Department of Human  
 13 Resources, DHR, and questioned them on the process of  
 14 having a promotion rescinded.  
 15 **Q.** When you say "DHR," is that the State human  
 16 resources entity?  
 17 **A.** The Department of Human Resources I believe is  
 18 State, for all State agencies.  
 19 **Q.** Is that distinct from the Department of  
 20 Juvenile Corrections?  
 21 **A.** It's separate. It's a separate entity.  
 22 Department of Human Resources I believe is their own  
 23 identity that oversees all of the State human resource.  
 24 **Q.** Who did you speak to there, if you remember?  
 25 **A.** I don't remember. I spoke to a few different

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1 guessing it would have stated because of the error in  
 2 the questioning, the error in the test. I would have to  
 3 pull the letter to look at it. It's been about a year  
 4 since I've looked at it.  
 5 **Q.** Do you know if anything occurred between the  
 6 Department of Human Resources concerning the position  
 7 after that?  
 8 **A.** I know that there was a request for -- I don't  
 9 know if it came from DHR or IDJC, but there was a  
 10 request for the unit manager position job classification  
 11 or description to be reviewed and updated.  
 12 **Q.** Who issued that request to whom?  
 13 **A.** I don't know.  
 14 **Q.** Do you know if it was reviewed and updated?  
 15 **A.** I do know it was reviewed. I don't know if  
 16 the document was updated, but I know it was reviewed.  
 17 **Q.** I'm not sure if I had asked already or not.  
 18 Had anyone occupied that position before you applied for  
 19 it?  
 20 **A.** The unit manager position?  
 21 **Q.** Yes.  
 22 **A.** In what time period? There has been several  
 23 people.  
 24 **Q.** That one that you had applied for.  
 25 **A.** The one that I had applied for, I believe Dave

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1 people and I don't recall their names without looking it  
 2 up.  
 3 **Q.** What was the response that you got?  
 4 **A.** I don't recall the initial response. I think  
 5 I was told that somebody else would call me back.  
 6 **Q.** Did you get a call back?  
 7 **A.** I got a few calls from different people trying  
 8 to understand what had occurred. I don't believe at  
 9 that time they had been notified of what had happened.  
 10 **Q.** Did they seem to think that they should have  
 11 been notified?  
 12 **A.** I don't know. I didn't ask.  
 13 **Q.** Did anyone say that though?  
 14 **A.** Not that I recall.  
 15 **Q.** Did you ever exchange any documents or e-mails  
 16 or anything like that with them?  
 17 **A.** Not that I recall.  
 18 **Q.** Did you ever get an answer back? At some  
 19 point your dealings with the DHR came to end, I imagine.  
 20 **A.** Yes, I received a letter. I believe it was  
 21 the director of DHR or the supervisor of DHR sent me a  
 22 letter saying that the position had been canceled I  
 23 think was the word that was used.  
 24 **Q.** Did it say why?  
 25 **A.** I don't remember if it said why, but I'm

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1 Rohrbach was the unit manager prior to becoming the  
 2 program manager, and so when he was reclassified or the  
 3 position was reclassified, I think is how the unit manager  
 4 position originally came open.  
 5 **Q.** What do you mean by "reclassified"?  
 6 **A.** His program, his title, his job description  
 7 fell under a program manager rather than a unit manager.  
 8 So at some point he was changed from a unit manager to a  
 9 program manager. I don't know the time frame for how  
 10 long that he had been in that position before the unit  
 11 manager was opened up. I don't know the time frame for  
 12 that.  
 13 **Q.** Do you think it was empty for some period of  
 14 time?  
 15 **A.** I don't know how long.  
 16 **Q.** Is a program manager sort of an upgrade or a  
 17 promotion?  
 18 **A.** A program manager would be a promotion from a  
 19 unit manager.  
 20 **Q.** Did you follow up on the issue in any other  
 21 way, any other dispute or --  
 22 **A.** I worked with DHR and then I worked to do a  
 23 problem solving with Betty and/or Julie Cloud trying --  
 24 or maybe it was the Department in general, to look at  
 25 what had occurred, how it had occurred, why it occurred,

1 what could be done, and to rectify the situation.  
 2 Q. What was the outcome of that process?  
 3 A. The outcome was that the offer was rescinded,  
 4 and once DHR canceled the announcement or canceled the  
 5 position, it was squashed.  
 6 Q. When you say "DHR," you mean the State entity,  
 7 not the --  
 8 A. The Department of Human Resources.  
 9 Q. Are you aware of whether the Department's  
 10 human resources, internal human resources department,  
 11 was suspended or otherwise prohibited from new hires or  
 12 promotions after that?  
 13 A. I was not.  
 14 Q. You didn't hear anything about that?  
 15 A. I didn't hear anything about that. On  
 16 Thursday of this week when I met with Phil, he stated --  
 17 **MR. COLLAER: Hold it. Don't say anything**  
 18 **about what we were talking about.**  
 19 Q. (BY MR. SCHOPPE) So who was it that continued  
 20 to be in charge of or oversee those two units, Solutions  
 21 and Choices?  
 22 A. Dave Rohrbach.  
 23 Q. His role is program manager now?  
 24 A. Yes.  
 25 Q. Did either Betty Grimm or Julie Cloud discuss

1 A. Yes.  
 2 Q. How much longer did you continue in that  
 3 position?  
 4 A. Until I applied for the unit manager position  
 5 again and reinterviewed and was rehired.  
 6 Q. Do you remember when that was?  
 7 A. I would have to guess, so no.  
 8 Q. 2012 make sense?  
 9 **MR. COLLAER: Don't guess. If you know.**  
 10 Q. (BY MR. SCHOPPE) Don't guess. Just if it  
 11 makes sense.  
 12 A. I don't. I don't know the date. I would have  
 13 to look it up.  
 14 Q. Was it the same unit manager position?  
 15 A. It was a unit manager position over the  
 16 programs; Choices and Solutions.  
 17 Q. Same job description as far as you know?  
 18 A. I would have to look at the job description  
 19 and compare them to know if they were the same.  
 20 Q. As far as you knew at the time, you would be  
 21 doing the same sort of things as you had hoped to do the  
 22 first time around?  
 23 A. Yes.  
 24 Q. As far as you know, was the test the same or  
 25 had it been changed?

1 future prospects with you at that time for other  
 2 opportunities that might arise in the future?  
 3 A. They encouraged me to keep my head up and they  
 4 encouraged me that as time went on if other positions  
 5 came open that I was interested in, to apply. They  
 6 never gave me specifics. They never gave me a  
 7 direction. I think they were just working to encourage  
 8 me not to quit.  
 9 Q. Were you thinking about quitting?  
 10 A. I was pretty pissed off, yeah. There is  
 11 probably a more professional way of saying that.  
 12 Q. Tell it straight.  
 13 Did they explain to you why it was that you  
 14 were offered the position in the first place?  
 15 A. As a unit manager?  
 16 Q. Yes.  
 17 A. Because I was the best candidate when I  
 18 interviewed.  
 19 Q. Did they say why they thought you were the  
 20 best candidate?  
 21 A. No.  
 22 Q. What happened after that, back to work as PbS  
 23 coordinator?  
 24 A. After the job was rescinded?  
 25 Q. Yes.

1 A. I believe the test had been changed.  
 2 Q. How so?  
 3 A. I would have to look at them to be able to  
 4 compare the difference. A lot of the answers that I had  
 5 answered on the first go-around I used for the second  
 6 test. So I don't know that there was a significant  
 7 change, but I would hope they would have changed it, due  
 8 to the flaw in the question.  
 9 Q. How is it you became aware of the unit manager  
 10 position the second time around?  
 11 A. I was offered the position after applying,  
 12 interviewing, after the application process.  
 13 Q. Was it posted like the first one?  
 14 A. It was.  
 15 Q. Was that posted, as far as you know, to  
 16 current employees or to the world at large?  
 17 A. I think it was current employees. So it would  
 18 have been posted to all State employees. I don't know  
 19 if it was internal or external to State employees.  
 20 Q. Who was it that interviewed you?  
 21 A. Dave Rohrbach was there, there was an HR  
 22 personnel, and two others. I don't remember who was in  
 23 the first interview panel. Second interview panel, is  
 24 that what we are referencing?  
 25 Q. Yes.

1 A. It was Jody Sciortino, Richard Duke, Dave  
 2 Rohrbach, and an HR staff.  
 3 Q. You're not sure who that was?  
 4 A. I'm not sure.  
 5 Q. How did the interview process go?  
 6 A. They asked questions, I answered questions,  
 7 lasted about 40 minutes.  
 8 Q. Did you discuss the first time you had  
 9 applied?  
 10 A. No.  
 11 Q. In between your first application and the  
 12 second, were there any changes in your credentials or  
 13 qualifications, education, training, anything like that?  
 14 A. I went to one training offered by POST, and I  
 15 took an online class for supervisory experience.  
 16 Q. What was that training, the POST training?  
 17 A. I would have to look it up. It was a POST  
 18 training on supervision, frontline supervision. I don't  
 19 remember the term or the exact name.  
 20 Q. What was the online class?  
 21 A. The online class was frontline supervision. I  
 22 don't remember the name of it. It would be in my  
 23 TrainCaster documentation. It's where IDJC tracks the  
 24 training that their staff do.  
 25 Q. Who offered that online class?

1 have any class time or anything along the lines of an  
 2 internship or anything where you might have gone and  
 3 supervised anybody?  
 4 A. It was a 40-hour, five-day-long training.  
 5 Q. Were you reimbursed by the Department for  
 6 that?  
 7 A. I was paid for work time. Is that the  
 8 question?  
 9 Q. A little different.  
 10 **MR. COLLAER: Tuition.**  
 11 **THE WITNESS: Tuition? No, there was no fee**  
 12 **for that class. It was offered by POST, and there were**  
 13 **positions that were offered to IDJC at no charge.**  
 14 Q. (BY MR. SCHOPPE) So that's the POST course.  
 15 How about the CWI course?  
 16 A. The CWI course, I went through the facility  
 17 training coordinator, which would have been myself. I  
 18 filled out my documentation and then I submitted it to  
 19 my supervisor for approval.  
 20 Q. Who was that?  
 21 A. Betty Grimm.  
 22 Q. Then the crucial confrontations course, where  
 23 was that?  
 24 A. It was in Boise somewhere, I'm not quite sure,  
 25 it was at a hotel offsite.

1 A. CWI.  
 2 Q. College of Western Idaho?  
 3 A. Correct.  
 4 Q. Do you have a textbook or anything like that?  
 5 A. I believe the online course you printed off  
 6 the information, because it was online. So I probably  
 7 still have the binder with the printed off information.  
 8 And the POST course gave you a binder with information.  
 9 Q. Did you have any supervisory duties or  
 10 anything like that in the workplace in between the two  
 11 applications?  
 12 A. The training coordinator position required you  
 13 to have a level of authority without having any  
 14 supervisory power. So one of the areas of concern when  
 15 I got that position was that I needed to be able to  
 16 exert authority to get the work done, get people to  
 17 follow through, and get the data to be accurate without  
 18 having any supervisory role. And so I had taken a  
 19 crucial confrontation course to be able to engage with  
 20 people at that level. Then on my performance evaluation  
 21 the prior year I was asked to complete supervisory  
 22 training as one of my objectives.  
 23 Q. Did you?  
 24 A. I did, in the POST course and the CWI course.  
 25 Q. In the supervisory training course did you

1 Q. Was that like a seminar kind of format?  
 2 A. It was a seminar format, I believe it was  
 3 three days. I took that the first year I was in my  
 4 training coordinator position.  
 5 Q. Was that also sponsored by the Department?  
 6 A. It was.  
 7 Q. When you say "training coordinator," is that  
 8 different from the PbS coordinator position?  
 9 A. No. The training PbS coordinator position is  
 10 the exact same.  
 11 Q. Did Julie McCormick also take that CWI course  
 12 with you?  
 13 A. No, not that I'm aware.  
 14 Q. Were you aware of whether she took any  
 15 supervisory training courses?  
 16 A. She took the POST course with me.  
 17 Q. What was the title of that again?  
 18 A. I don't know. I would have to look up the  
 19 title.  
 20 Q. In October or November of 2011 did you become  
 21 aware of staff, staff at the facility, being upset about  
 22 hiring practices at the Department, specifically  
 23 concerning your hiring or Julie McCormick's hiring?  
 24 A. The only time I became aware that staff were  
 25 upset about my hiring is when I was told there was a

1 petition that had been created pertaining to my hiring  
 2 as a unit manager. I don't know what the time frame or  
 3 the date of that was.  
 4 Q. At that point the position had already been  
 5 offered and then rescinded?  
 6 A. I believe so.  
 7 Q. So you would have been still working as PbS  
 8 training coordinator?  
 9 A. Yes.  
 10 Q. Who told you about the petition?  
 11 A. Joe Langan.  
 12 Q. What was Joe's role at the Department?  
 13 A. He's a district liaison.  
 14 Q. What do you mean by that; what is that  
 15 position?  
 16 A. The district liaison?  
 17 Q. Yes.  
 18 A. He interacts with the counties. He's the  
 19 go-between between the counties and the State agency.  
 20 He works with the counties on funding, aftercare  
 21 treatments, community relationships. He works with all  
 22 kinds of people.  
 23 Q. How did he know about it?  
 24 A. He was approached by Ray Gregston and asked to  
 25 sign a petition.

1 Q. Did he sign it?  
 2 A. He did not. To my knowledge he stated he  
 3 didn't.  
 4 Q. Did he have anything else to say about the  
 5 petition?  
 6 A. He thought it was unprofessional and  
 7 inappropriate and thought that I should be made aware.  
 8 Q. Did he talk about or tell you that he had seen  
 9 anybody else who had signed the petition?  
 10 A. Not that I'm aware of.  
 11 Q. Apart from Mr. Gregston's name, anybody else's  
 12 name come up in connection with that discussion?  
 13 A. Between myself and Joe Langan?  
 14 Q. Yes.  
 15 A. We called Betty Grimm and informed her that  
 16 Ray Gregston had created a petition and was passing it  
 17 around trying to get staff to sign it.  
 18 Q. Were both of you like on a conference call?  
 19 A. Yes. I went to Joe's office and we called  
 20 Betty.  
 21 Q. Where were you?  
 22 A. At Joe's office?  
 23 Q. Yes.  
 24 A. In Nampa, the Nampa facility.  
 25 Q. So you just called within the facility?

1 A. No. She was off. It was after hours. She  
 2 was home.  
 3 Q. What did you talk about with Betty?  
 4 A. That Joe Langan had informed me that Ray  
 5 Gregston had created a petition and was taking it around  
 6 for staff to sign.  
 7 Q. How did she respond?  
 8 A. She asked me what I was talking about. I said  
 9 that is all the information I had. I didn't know  
 10 anything else about it. I just knew what I had told  
 11 her.  
 12 Q. Did she say anything else?  
 13 A. Not that I recall.  
 14 Q. Did she indicate her reaction to that, good or  
 15 bad, like you were unprofessional, anything like that?  
 16 A. No. I asked her what would be done, she said  
 17 she would address it.  
 18 Q. Do you know if she did address it?  
 19 A. I don't know what happened after that.  
 20 Q. Did you ever hear anything about the petition  
 21 again?  
 22 A. I spoke at some point, I don't know the time  
 23 frame, to the Director and asked the Director about it.  
 24 And it was explained to me that Ray had the right to  
 25 create a petition. And I think that was it. We didn't

1 really go into any more detail. He just had the right  
 2 to create it. I don't know what the expectation was. I  
 3 don't know if there was criteria or anything else around  
 4 that. It was just one of the amendment rights.  
 5 Q. I'm sorry. You had spoken with the Director  
 6 about that?  
 7 A. I did.  
 8 Q. Do you know how long that was after you  
 9 learned about the petition?  
 10 A. No, I don't know the time frame.  
 11 Q. Less than six months afterwards?  
 12 A. I don't know the time frame.  
 13 Q. Do you know if it was before or after you  
 14 became unit manager the second time?  
 15 A. I didn't document the time frame, so I don't  
 16 recall.  
 17 Q. Did you hear anything about a November 2011  
 18 all-staff meeting concerning the petition?  
 19 A. I don't know that it was concerning the  
 20 petition, but I believe the November all-staff meeting  
 21 that occurred had to do with the Department's values.  
 22 Q. How so?  
 23 A. The Director came out and spoke of the  
 24 Department values.  
 25 Q. Were you there?



1 A. I was there. I was there for about half to  
 2 three-quarters of the meeting. I said I had a doctor's  
 3 appointment and left.  
 4 Q. What did the Director have to say?  
 5 A. She came out to speak on the Department  
 6 values. So she had a list, she had an easel where she  
 7 wrote down the values and...  
 8 Q. Do you recall what she wrote?  
 9 A. I don't recall what she wrote. It probably  
 10 spoke to the values of respect and integrity.  
 11 Q. In discussing those values, how was she  
 12 applying those values in that context?  
 13 A. I think she was just putting them out as an  
 14 expectation. This is what the Department represents.  
 15 Q. Respect towards whom?  
 16 A. Well, part of the values speak to our  
 17 community partners as well as the people we work with.  
 18 Q. How about integrity?  
 19 A. That would fall under the same guidelines.  
 20 Integrity when dealing with our community partners. And  
 21 I don't know if it was integrity. I don't remember the  
 22 terms. We would have to look at the Department mission  
 23 or Department value statement to be able to accurately  
 24 depict what was on the easel.  
 25 Q. Were the hiring issues, your hiring or Julie

1 were people talking about, what was your impression?  
 2 A. I believe I shared that.  
 3 **MR. COLLAER: Go ahead and relate what you**  
 4 **remember. I don't want you to speculate.**  
 5 **THE WITNESS: The group of people that were**  
 6 **speaking the majority of the time were O&A staff. They**  
 7 **were speaking to their staff schedules, they were**  
 8 **speaking to the changes in their staff schedules, and**  
 9 **they were speaking to hiring.**  
 10 Q. (BY MR. SCHOPPE) Did they relate that they  
 11 thought there was a problem with hiring?  
 12 A. I don't recall how they worded it.  
 13 Q. They were upset about some things, fair to  
 14 say?  
 15 A. They were upset.  
 16 Q. Fair to say they were also upset about what  
 17 was happening with their scheduling?  
 18 A. Yes.  
 19 Q. Do you recall why?  
 20 A. Because they had had set schedules and they  
 21 had had set 10-hour shifts, and those were changing due  
 22 to coveraging.  
 23 Q. Who made those changes?  
 24 A. I don't know. I would have to assume.  
 25 Q. Do you know who was in charge of making those

1 McCormick's hiring, discussed as far as you recall?  
 2 A. There were staff in the meeting that spoke to  
 3 some of their feelings and beliefs when they were given  
 4 the chance to ask questions at different intervals. And  
 5 I don't believe that my hiring or Julie's hiring  
 6 directly was questioned. I think people inferred a lot  
 7 of things and asked questions dancing around issues.  
 8 Q. How do you mean?  
 9 A. My name was never mentioned. Julie's name was  
 10 never mentioned.  
 11 Q. Who was it that spoke that you recall?  
 12 A. The only person I recall speaking was Diana  
 13 Carnell. I'm sure there were others, but that is who I  
 14 recall.  
 15 Q. What do you remember about what she said?  
 16 A. I don't. I just know she was asking  
 17 questions.  
 18 Q. But you don't remember what the substance of  
 19 the questions were?  
 20 A. She spoke to shifts, to the hours that were  
 21 worked and wanting to work at different hours. She  
 22 spoke to hiring, but I don't remember how it was worded  
 23 or what the question was.  
 24 Q. When you said that people were dancing around  
 25 subjects, didn't mention you or Julie McCormick. What

1 changes?  
 2 A. Tom Knoff would have been the unit supervisor.  
 3 Q. Who said it was because of coverage needs?  
 4 A. When you have a change in schedule because you  
 5 are not -- because there is not enough staff on the  
 6 floor, and this is just my assumption, I would have  
 7 assumed because it was due to the scheduling needs, to  
 8 coverage needs.  
 9 Q. But nobody said that is why it was happening?  
 10 A. I don't remember anyone saying that, but I  
 11 don't remember a reason being given.  
 12 Q. As far as you could tell, were the O&A staff  
 13 that you heard speaking out being critical of the  
 14 Director?  
 15 A. They were being critical in general.  
 16 Q. Critical in general of?  
 17 A. Aggressive in questioning, loud when  
 18 questioning, just unhappy.  
 19 Q. Do you recall any other issues coming up in  
 20 the meeting other than things you've discussed?  
 21 A. I don't. I don't recall all the meeting. I  
 22 know it was probably an hour long, but I don't recall  
 23 everything that was covered.  
 24 Q. Do you know about how many people were there?  
 25 A. No, but I know there is many notes. We could



1 pull and look at the notes of people who signed in for  
 2 the meeting.  
 3 Q. After that do you know if anything was done by  
 4 the Director or Ms. Grimm -- was Ms. Grimm also present?  
 5 A. She was.  
 6 Q. Do you know if there was an outcome to that  
 7 resolution or anything like that?  
 8 A. There was an offer from the Director for  
 9 people who did not feel comfortable speaking out in the  
 10 meeting to meet with her.  
 11 Q. Did she make that offer there at the meeting?  
 12 A. I had left the meeting, so I don't know if she  
 13 made it at the meeting, but I believe she sent an e-mail  
 14 out, an invitation.  
 15 Q. Did you meet with her?  
 16 A. I did not.  
 17 Q. Do you know anybody who did?  
 18 A. I don't know anyone directly who did.  
 19 Q. Did you meet with or did you discuss the  
 20 petition again with anybody else in the Department at  
 21 all?  
 22 A. The times I discussed the petition were the  
 23 two times I mentioned. Once was when Betty, when we  
 24 called her. Once was with Sharon Harrigfeld when I  
 25 asked if it was going to be stopped, and she told me

1 they had the right through the amendments. But within  
 2 the Department in the professional setting, I had not  
 3 talked about it.  
 4 Q. Why were you asking if it would be stopped?  
 5 A. Because having someone taking a petition  
 6 around to your coworkers and say negative things about  
 7 you and encourage people to sign stuff about you is  
 8 pretty disrespectful, and I didn't like it.  
 9 Q. Did you feel things were not true?  
 10 A. I don't believe the things were -- I don't  
 11 know what it said, so I don't know if they were true or  
 12 not. They never came to me.  
 13 Q. How did you know they were negative things?  
 14 A. Because the people that were being asked to  
 15 sign the petition refused to sign it because they  
 16 thought it was disrespectful.  
 17 Q. Who were those other people?  
 18 A. The people that I was made aware of that were  
 19 asked were Joe Langan and O'Neal Rich. I'm sure there  
 20 were others, but I did not talk with everyone. I didn't  
 21 go around questioning.  
 22 Q. Did you talk with anybody else?  
 23 A. About the petition?  
 24 Q. Yes.  
 25 A. Not at their professional level, no.

1 Q. Inside the Department are you familiar with  
 2 what sets of laws or policies apply to the operations of  
 3 the Department?  
 4 A. Am I familiar with policies?  
 5 Q. Yes.  
 6 A. I believe I'm familiar with policies, yes.  
 7 Q. Where do those policies come from, as far as  
 8 you know?  
 9 MR. COLLAER: Are you talking about internal  
 10 policies? What policies are you referring to?  
 11 Q. (BY MR. SCHOPPE) Whatever policies you are  
 12 thinking of.  
 13 A. Internal policies for IDJC are created by the  
 14 IDJC IPSS team or leadership or committees that are  
 15 created to go over policies, and then they are reviewed  
 16 on several levels.  
 17 Q. As far as you know, is that process followed  
 18 every time?  
 19 A. As far as I know.  
 20 Q. Are you aware of whether any portion of the  
 21 Idaho Administrative Procedures Act, or IDAPA, you may  
 22 have seen that acronym somewhere --  
 23 A. Sure. IDAPA is through legislature rule.  
 24 Q. Right.  
 25 Are you aware of whether any specific IDAPA

1 policies apply to the operations of the Department?  
 2 MR. COLLAER: Object to the form of the  
 3 question; it's vague. If you understand, go ahead, but  
 4 don't guess.  
 5 THE WITNESS: Yes.  
 6 Q. (BY MR. SCHOPPE) Which provisions?  
 7 A. I don't know what you are asking.  
 8 Q. My question is whether you were aware of  
 9 whether any provisions of IDAPA apply to the operation  
 10 of the Department.  
 11 A. The IDAPA rules are written for the  
 12 Department, and yes, we are required to follow them.  
 13 Q. What set of IDAPA rules?  
 14 A. There is a whole book of IDAPA rules that are  
 15 written for Idaho Department of Juvenile Corrections.  
 16 Q. Do you know numbers or titles or anything like  
 17 that?  
 18 A. No, but there is a whole book.  
 19 Q. Would the book possibly refer to the Idaho  
 20 Juvenile Corrections Act?  
 21 A. I would hope so.  
 22 Q. When you say the "book," what is it you are  
 23 referring to specifically?  
 24 A. There is an IDAPA rule book.  
 25 Q. Does that have a title other than IDAPA rule

1 book?  
 2 A. I would have to have it in front of me to tell  
 3 you.  
 4 Q. Would that govern hiring and promotions?  
 5 A. I don't know.  
 6 Q. How about safety and security?  
 7 A. There are areas of safety and security in the  
 8 book.  
 9 Q. Juvenile supervision?  
 10 A. There are areas for juvenile supervision, yes.  
 11 Q. Have you ever had any PREA or CRIPA training?  
 12 A. I have had PREA training, yes.  
 13 Q. What did that training consist of?  
 14 A. Quite a few things. We've had trainings at  
 15 our facility. We've had trainings where the state PREA  
 16 coordinator has come out and trained, and I also went to  
 17 the federal guidelines implementation training.  
 18 Q. Is that on several different occasions, is  
 19 that all at once, or when did that happen?  
 20 A. The PREA training that is internal occurs  
 21 often, and I've been a few times. The federal  
 22 guidelines training occurred once that I attended.  
 23 Q. Do you know when the federal guidelines  
 24 training was?  
 25 A. I don't know. I would have to look it up.

1 Q. Do you recall what role you held or job you  
 2 held at the Department when you took that training?  
 3 A. No, because I don't remember when it was. I  
 4 would have to look it up.  
 5 Q. What other kinds of incidents fall within the  
 6 scope of PREA?  
 7 A. The incidents for PREA are sexual in nature.  
 8 Q. That is kind of a general summary?  
 9 A. It is. To have a definition of it, we can  
 10 pull the definition. But PREA in general is Prison Rape  
 11 Elimination Act, so the incidents are sexual in nature  
 12 to be able to be defined.  
 13 Q. How does that process work for reporting PREA  
 14 incidents?  
 15 A. Reporting PREA by a youth?  
 16 Q. Sure.  
 17 A. So if a youth feels they have been offended  
 18 against, they report it to either a staff, there is a  
 19 1-800 number they can call, they can go to a supervisor,  
 20 they can report through the grievance procedure, they  
 21 can report to a clinician. They can report pretty much  
 22 to anyone they feel comfortable reporting to.  
 23 The first person, staff and/or child  
 24 protection and/or 1-800 that has enough information,  
 25 creates a PREA document, a 131 form that speaks to the

1 disclosure. They also create an incident report at  
 2 Nampa that states a disclosure was made. And then the  
 3 PREA form has a list of people that are required for  
 4 notification, notifications go out, and then a site  
 5 coordinator follows up.  
 6 Q. Who is the PREA site coordinator?  
 7 A. Currently it's Mark Freckleton.  
 8 Q. Has that changed?  
 9 A. It's changed a few times.  
 10 Q. Do you know who it was before he was?  
 11 A. Ashley Jorgensen.  
 12 Q. As far as you know, is that process followed  
 13 every time?  
 14 A. It's followed every time as long as the person  
 15 who is being reported to completes the documentation.  
 16 Q. Is there a different process for staff?  
 17 A. If a staff has a PREA allegation?  
 18 Q. Yes.  
 19 A. Staff on staff I don't believe would be PREA  
 20 because they are not incarcerated.  
 21 Q. I only ask because when I first started out  
 22 you had asked about youth specific.  
 23 A. Yeah, youth on youth.  
 24 Q. Is there any other kind?  
 25 A. There is youth on staff or staff on youth, and

1 they would be reported the same way.  
 2 Q. As far as you know, are incidents of child  
 3 abuse or neglect or sexual abuse required to be reported  
 4 to the Idaho Department of Health and Welfare?  
 5 A. Idaho Department of Health and Welfare or the  
 6 police.  
 7 Q. As far as you know, are you and everyone in  
 8 the Department mandatory reporters?  
 9 A. Yes.  
 10 Q. Are you aware of any instances of sexual  
 11 misconduct between staff and juveniles that have not  
 12 been reported?  
 13 A. No.  
 14 Q. Would those same instances also be subject to  
 15 the PREA reporting rules?  
 16 A. Of a youth on staff? I don't understand the  
 17 question.  
 18 Q. Staff on youth.  
 19 A. The staff on youth that I'm aware of?  
 20 Q. Yes.  
 21 A. Yes.  
 22 Q. How about with respect to youth-on-staff PREA  
 23 incidents, what --  
 24 A. A youth would have to report that or a staff  
 25 would have to report that, and yes, it would go under

1 the same guidelines.  
 2 Q. So that's some sort of interaction, and I'm  
 3 thinking by a youth towards a staff, a sexual nature.  
 4 A. If there is a youth that is having comments  
 5 that are sexual in nature towards staff, the youth would  
 6 be addressed. I don't know it would be PREA, per se,  
 7 but a youth would be addressed for appropriateness.  
 8 Part of the job description of working in the  
 9 environment that we work in is that the youth need to be  
 10 taught different expectations and different ways of  
 11 modeling behavior. So staff would need to engage and  
 12 teach the youth that that is inappropriate.  
 13 Q. Stepping back to the unit manager position and  
 14 the second time you applied for that. You made the  
 15 application, were interviewed, and an offer was made to  
 16 you; is that fair?  
 17 A. Yes.  
 18 Q. Do you recall who extended the offer to you?  
 19 A. I believe it was Dave Rohrbach.  
 20 Q. At some point Mr. Rohrbach left, right, the  
 21 facility?  
 22 A. He did; he retired.  
 23 Q. Do you know why?  
 24 A. Health.  
 25 Q. Did you ever hear of any allegations of time

1 the majority of my time with supervisors and then doing  
 2 documentation for program material.  
 3 Q. Who did you supervise?  
 4 A. Over in Choices I supervised Colleen Foster,  
 5 Nick Tinker, Jeff Underhill, Eric Cotton, Mark  
 6 Freckleton, and Manuel Cavazos.  
 7 Q. Did you have anybody else that you supervised?  
 8 A. At that time I don't believe so.  
 9 Q. How long were you in that position?  
 10 A. I believe I was in that position for about six  
 11 months, give or take.  
 12 Q. Then what?  
 13 A. And then I was called to Betty Grimm's office  
 14 and informed that I was going to be moving down to the  
 15 observation and assessment unit.  
 16 Q. What did she tell about that?  
 17 A. She told me that the role needed to filled,  
 18 that I was being moved down. She gave me an effective  
 19 date. She said that Knoff was no longer in that  
 20 position. And I think that was it at that time.  
 21 Q. Did she tell why you Tom Knoff was no longer  
 22 in that position?  
 23 A. No.  
 24 Q. Did you ever form any understanding of why  
 25 that was?

1 card fraud against Mr. Rohrbach?  
 2 A. I believe that was part of the lawsuit.  
 3 Q. Before the lawsuit was filed did you hear  
 4 anything?  
 5 A. Not that I recall.  
 6 Q. Same question for Mrs. Rohrbach.  
 7 A. No.  
 8 Q. The second time around, had anyone filled that  
 9 unit manager position?  
 10 A. Prior to me?  
 11 Q. Yes.  
 12 A. Dave Rohrbach was the only one that was acting  
 13 in that position. As the program manager, he was acting  
 14 as both program manager and the unit manager.  
 15 Q. What did you do in that role as unit manager?  
 16 A. As a unit manager you oversee unit business,  
 17 you look at best practices on the unit, you look at the  
 18 programming, how it's being utilized. You work with the  
 19 staff on training, you work on handbooks, run program  
 20 documentation, implementation of classes, effectiveness  
 21 of implementation on the floor. Ensuring that staff are  
 22 following through with what their supervisors are  
 23 expecting of them. I worked with supervisors to ensure  
 24 that the scheduling allowed for adequate coverage. I  
 25 worked on the floor teaching role modeling. I worked

1 **MR. COLLAER: Objection; calls for**  
 2 **speculation. If you know.**  
 3 **THE WITNESS: I don't. It's just opinion. I**  
 4 **have no direct knowledge.**  
 5 Q. (BY MR. SCHOPPE) But did you ever form an  
 6 impression?  
 7 **MR. COLLAER: Same objection; calls for**  
 8 **speculation.**  
 9 **THE WITNESS: All I had was my personal**  
 10 **opinion.**  
 11 Q. (BY MR. SCHOPPE) That is what I'm asking,  
 12 whatever your opinion was.  
 13 A. My opinion?  
 14 Q. Yes.  
 15 **MR. COLLAER: At the time.**  
 16 **THE WITNESS: My opinion at the time was that**  
 17 **he was struggling with staff coverage, he was struggling**  
 18 **with ensuring that his staff were doing documentation.**  
 19 **He was not following through with ensuring that youth**  
 20 **weren't locked down for lack of cause. That was my**  
 21 **opinion at the time.**  
 22 Q. (BY MR. SCHOPPE) How did you form that  
 23 opinion?  
 24 A. As the PbS coordinator I worked with him over  
 25 the course of the two years on staff not completing

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1 their incident reports on that unit, not documenting  
 2 when they were restraining youth accurately, not  
 3 documenting room confinement accurately. And then staff  
 4 shortages, not having enough staff on the floor so youth  
 5 had to be locked down for shifts.  
 6 Q. Was there a standard, as far as you know, that  
 7 Mr. Knoff was following in his role -- was he the unit  
 8 manager?  
 9 A. I believe he was a rehab technician  
 10 supervisor.  
 11 Q. Had he at one point been a unit manager?  
 12 A. He had at one point.  
 13 Q. Was there a standard that he was following, as  
 14 far as you know?  
 15 A. I did not work in the unit, so I didn't work  
 16 directly with him.  
 17 Q. But were you aware of any particular standard,  
 18 like PbS type standard or anything like that?  
 19 A. The expectation would have been for him to  
 20 follow the standards of the facility, PbS's best  
 21 practice, an outside entity that helps us to follow best  
 22 practices.  
 23 Q. But you are not sure if he had any other kind  
 24 of standard or anything like that in mind.  
 25 A. The Department has standards, which he would

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1 A. The "staff convenience" term came from me  
 2 trying to figure out what to call the time. When I  
 3 worked with Tom Turos, who was our PbS coach, trying to  
 4 determine what we were going to call this time, because  
 5 it has to be documented, the PbS term I believe has to  
 6 do -- the idea has to do with -- what's the terminology  
 7 for it? There is a PbS term for it, but it's where it  
 8 shows an unstructured time where youth are locked down  
 9 and not engaged in programming, they are not engaged  
 10 with other staff or other youth. We could probably look  
 11 it up on the PbS site and I could give you the name.  
 12 Q. What about the lockdown for staff convenience  
 13 was a problem?  
 14 A. What about it that's a problem?  
 15 Q. Yes.  
 16 A. Because the staff are being paid to work with  
 17 the youth.  
 18 Q. Were the rights of the juveniles being  
 19 violated?  
 20 MR. COLLAER: **Objection; calls for a legal**  
 21 **conclusion.**  
 22 Q. (BY MR. SCHOPPE) As far as you were  
 23 concerned?  
 24 MR. COLLAER: **Same objection. If you know.**  
 25 THE WITNESS: **I don't know. I just know we**

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1 have been expected to follow.  
 2 Q. Your understanding is he was not following  
 3 those standards?  
 4 A. It was my understanding that he was not  
 5 meeting coverage needs and not following through with  
 6 his staff completing IRs and allowing room confinement  
 7 for lack of cause.  
 8 Q. When you are referring to "room confinement  
 9 for lack of cause," is there a particular standard you  
 10 are referring to that defines what's appropriate room  
 11 confinement and what is not?  
 12 A. For PbS standards, they measure room  
 13 confinement that occurs between 6:00 a.m. and 10:00 p.m.  
 14 And it was occurring on the O&A unit, youths were being  
 15 locked down after mealtimes to allow staff to take  
 16 breaks and eat meals.  
 17 Q. Is that what you would call a lockdown for  
 18 staff convenience?  
 19 A. That is what I would call lockdown for staff  
 20 convenience, or if there was a staff that was running  
 21 late or if there was a lack of staff coverage for a  
 22 particular event, such as PE or religious time or  
 23 cleaning, youth would be locked down.  
 24 Q. Is that a PbS standard terminology or did that  
 25 come from somewhere else?

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1 **don't lock our youth down for our own convenience. That**  
 2 **isn't what our job is.**  
 3 Q. (BY MR. SCHOPPE) If there wasn't enough  
 4 coverage on the floor, is that an inappropriate use of  
 5 lockdown?  
 6 A. I don't believe that it's inappropriate if  
 7 there is not enough staff on the floor. Ask the  
 8 question again, please.  
 9 Q. If there wasn't enough staff on the floor or  
 10 if there were instances where someone might be late or  
 11 called off sick or perhaps covering, you mentioned  
 12 religious services or something like that, would that  
 13 then be inappropriate to lock down juveniles?  
 14 A. What caused it to be inappropriate? If you  
 15 don't have enough staff scheduled on the schedule to  
 16 meet the needs of the facility, if you have a youth that  
 17 is locked down or set of youths locked down because you  
 18 have the appropriate number and you can't meet the  
 19 needs, it would be the expectation that I would have as  
 20 a supervisor that I work to create a schedule that  
 21 allows coverage. If somebody calls in sick, as a  
 22 supervisor I would work to ensure that we had coverage.  
 23 As a supervisor one of the expectations is to come in  
 24 and cover on some of those shifts.  
 25 Q. Did you discuss that with Mr. Knoff?



1 A. It wasn't my place to discuss that with  
 2 Mr. Knoff. I wasn't his supervisor.  
 3 Q. But did you discuss it with him?  
 4 A. I believe I discussed it with Betty Grimm.  
 5 Q. Are you aware of whether she discussed that  
 6 with him?  
 7 A. I'm not.  
 8 Q. When she told you that Mr. Knoff was no longer  
 9 in the position, did she tell you whether he had been  
 10 terminated, resigned, something like that?  
 11 A. No. She just said he was not in that  
 12 position.  
 13 Q. Did you ever discuss his departure with anyone  
 14 else?  
 15 A. I discussed it on personal time.  
 16 Q. Did you ever discuss it with anyone in HR?  
 17 A. I think the only time it was discussed is how  
 18 it pertained to me taking over in O&A.  
 19 Q. What do you mean by that?  
 20 A. When I was asked to transfer over there, I had  
 21 asked HR if it was a full transfer, if I had the option  
 22 to come back, if I had the ability to go back to the  
 23 Choices and Solutions program at some time, if it was  
 24 going to be for 30 days or 60 days, I asked for  
 25 timelines.

1 Q. What were you told?  
 2 A. I was told that it was for an unset amount of  
 3 time, so there was no real direction on how long I would  
 4 be there. And then I was told that if I had the desire  
 5 at any time to go back to Choices and Solutions as the  
 6 unit manager, it would have to be readdressed through  
 7 the Department.  
 8 Q. Did someone take your position when you made  
 9 the transfer over to O&A?  
 10 A. Sometime later the position was offered.  
 11 Initially -- Ashley Jorgensen was now in the position --  
 12 I think Ashley Jorgensen was in the position as the  
 13 program manager at that time, and I think she was  
 14 filling the role as the program manager and unit  
 15 manager.  
 16 Q. Is she still in that position?  
 17 A. She is not. There have been changes in the  
 18 structure with the change in superintendents.  
 19 Q. How so?  
 20 A. The superintendent eliminated the program  
 21 manager position and created three unit manager  
 22 positions.  
 23 Q. Was the opening in the O&A unit posted, as far  
 24 as you know?  
 25 A. The unit manager position that I was

1 transferred to?  
 2 Q. Yes.  
 3 A. No.  
 4 Q. Do you know why?  
 5 A. Because I was transferred to it.  
 6 Q. So if person is transferred to a position,  
 7 it's not posted, as far as you know?  
 8 A. It was the same position, it was a unit  
 9 manager position. I was transferred into a unit manager  
 10 position, so I don't know that those are posted. I've  
 11 never seen those posted.  
 12 Q. Do you know if anybody else applied for the  
 13 position?  
 14 A. If it wasn't posted, there would have been no  
 15 one applying for that position.  
 16 Q. But you don't know if anybody else heard about  
 17 the position and applied for it?  
 18 A. No, I don't know.  
 19 Q. As far as you know, were you the only person  
 20 who was told about the opportunity?  
 21 A. I don't believe it was an opportunity. I was  
 22 assigned. I was brought into an office with several  
 23 people and I was told that I was being transferred.  
 24 Q. So at the time, right up until the moment you  
 25 were transferred, I think you testified earlier

1 Mr. Knoff had held the position as a lead rehab tech?  
 2 A. He was a rehab technician supervisor I believe  
 3 is what his position was.  
 4 Q. Then he, as far as you know, when he left the  
 5 facility for whatever reason, he was in that capacity,  
 6 in that position?  
 7 A. Correct.  
 8 Q. So did the unit manager position in O&A exist  
 9 at any point in time up until you were assigned to it?  
 10 A. In the history of the Department or in the  
 11 last 30 days?  
 12 Q. At that point.  
 13 A. At that point it was a rehab technician  
 14 supervisor position. HR went through a process of  
 15 change at some point.  
 16 Q. Do you know if it was reclassified, as far as  
 17 you know?  
 18 A. As far as I know.  
 19 Q. Is there still a rehab tech supervisor  
 20 position there?  
 21 A. There is not.  
 22 Q. Do you know who handled that reclassification  
 23 or why it was done?  
 24 A. I do not.  
 25 Q. Did you discuss the assignment any further



1 with Ms. Grimm?  
 2 A. We discussed the placement of that position  
 3 several times because she was my supervisor.  
 4 Q. Did she tell you what she wanted you to do  
 5 there?  
 6 A. The direction that was given for that program  
 7 was to work on creating a staff schedule that allowed  
 8 appropriate coverage and creating a program dynamic that  
 9 allowed for the staff to work with the youth similar to  
 10 the expectations in the rest of the facility.  
 11 Q. Did she tell you that you were there to  
 12 restructure the Department?  
 13 A. To restructure the Department? No.  
 14 Q. Or would you characterize that as what you  
 15 were there to do?  
 16 A. No, I was not there to restructure the  
 17 Department.  
 18 Q. Did you discuss your assignment there with  
 19 Director Harrigfeld?  
 20 A. I don't believe so, no.  
 21 Q. How about with Julie Cloud?  
 22 A. No, I don't believe so.  
 23 Q. How about with Pat Thomson?  
 24 A. Pat Thomson and I spoke numerous times on some  
 25 of the struggles I was having with the restructuring and

1 voiced that anger often. She voiced it to me directly  
 2 one on one, and she also voiced it during team meetings.  
 3 Q. Was she angry, as far as you know, on a  
 4 personal sense, or was she angry about substantive  
 5 changes that were being made?  
 6 A. I don't know, I don't want to speculate what  
 7 caused her anger.  
 8 Q. Did she say why she was angry?  
 9 A. When she spoke when she became angry, she felt  
 10 that I did not have the authority to come in and make  
 11 changes to the unit that she worked in.  
 12 Q. Did she say why?  
 13 A. No.  
 14 Q. Did she object to any of the specific changes  
 15 you were making?  
 16 A. She did. She objected to the change in  
 17 schedule. She liked having her fixed schedule. She  
 18 didn't want to rotate. She didn't want to work the  
 19 different days of the week I was asking her to work.  
 20 She did not like the idea of working the floor with the  
 21 youth the way that I expected. She had feelings about  
 22 not being able to have dinner breaks when the youth were  
 23 isolated in their rooms. She did not want to eat with  
 24 the youth in the cafeteria. She was angry about being  
 25 held accountable when she was reading her personal books

1 the staff that I was working with. And I believe I  
 2 talked to Julie Cloud a few times concerning that same  
 3 dynamic.  
 4 Q. What do you mean by that?  
 5 A. There were staff on the unit that I was  
 6 overseeing that were difficult to work with. And so I  
 7 worked with our HR service on ideas on ways to process  
 8 and ways to work and ways to address it.  
 9 Q. Who were those staff that were difficult to  
 10 work with?  
 11 A. I think the majority of them initially were  
 12 difficult to work with, so I would have to give you the  
 13 list of the 14 staff that were employed at that time.  
 14 Q. Do you know who they were?  
 15 A. I would need to look up the list. My staff  
 16 has changed, so we could sit here for a few minutes and  
 17 I could try and recall names, but I think it would be  
 18 better just to pull the information.  
 19 Q. We can go through a few names. How about  
 20 Diana Carnell?  
 21 A. She was there at the time.  
 22 Q. Was she someone you considered to be difficult  
 23 to work with?  
 24 A. Diana Carnell was angry with the changes. She  
 25 was angry with the direction that I was giving. She

1 when she had supervision of youth.  
 2 Q. Did she ever express any concerns to you that  
 3 the changes you were making made the facility more  
 4 unsafe?  
 5 A. She did. She expressed that they could not  
 6 lock youth down for behaviors, that it caused an unsafe  
 7 environment, that youth should be locked down for three  
 8 days for assault.  
 9 Q. What had been the practice in the Department  
 10 up until that time in O&A?  
 11 A. I had not worked in O&A prior to that time, so  
 12 I don't know the practice. I think it had changed a few  
 13 times.  
 14 Q. Have you reviewed what the prior policies  
 15 were?  
 16 A. The policies and the practice would have been  
 17 different, because the policies, I don't believe, had if  
 18 you do this behavior you'll be locked down for this  
 19 amount of time. And so the practice in the handbook  
 20 they had just updated. And the handbook that I was  
 21 reviewing said the youth would be given something in the  
 22 form of a ticket out, is a term that was used. Reentry  
 23 contract was another term that was used. And that is a  
 24 contract that gives the youth that has been isolated a  
 25 set series of program work to complete prior to being

1 allowed out of their room for isolation.  
 2 Q. Is that the policy now, a reentry contract?  
 3 A. A reentry contract is what is utilized in O&A  
 4 when there is misbehavior.  
 5 Q. Did misbehavior include violent assaults by  
 6 juveniles on other juveniles?  
 7 A. It does.  
 8 Q. And on staff?  
 9 A. It does.  
 10 Q. How quickly can reentry contracts, the process  
 11 of reintegration take place?  
 12 A. What we try and focus on is, we try and focus  
 13 on the youth's behavior. So we try and focus on what  
 14 caused the behavior. A reentry contract is usually  
 15 written within the first hour the youth is confined. It  
 16 focuses on assignments that correlate with good  
 17 behavior. And then the youth completes the assignment,  
 18 and then they process that documentation with the staff.  
 19 So it ranges, depending on the willingness of  
 20 the youth to complete the documentation and the  
 21 processing process with the staff.  
 22 Q. Ms. Carnell, did anybody else share her  
 23 concerns of the sorts that you just outlined?  
 24 A. Concerns with not being be able to lock youth  
 25 down?

1 when they are to be watching the youth that they  
 2 separate, that one of them is on one side of the gym and  
 3 one of them is on the other side of the gym so they have  
 4 better observation, so they have an ability to hear the  
 5 youth. So I focused on placement.  
 6 I focused on not being behind the desk during  
 7 their shifts, working on the floor with the youth, not  
 8 being on the computer during their whole shift, unless  
 9 it's for facility business and it's appropriate, but  
 10 they shouldn't spend their whole time behind the desk.  
 11 I ask that they engage with the youth on the floor, role  
 12 modeling, teaching, getting to know the youth. Part of  
 13 our job is assessing and observing, and we can't do that  
 14 sitting behind a desk and not engaging. So my  
 15 expectation was to engage.  
 16 Q. Prior to that gym incident had Ms. Littlefield  
 17 expressed any concerns to you about safety or security  
 18 before that?  
 19 A. I would have to look up and look through my  
 20 e-mails. I don't remember.  
 21 Q. How about Gracie Reyna?  
 22 A. Gracie Reyna was the second person that was in  
 23 the gym during that incident, and she was addressed. I  
 24 don't know that she ever brought up the concerns with  
 25 safety, I don't recall her ever commenting or replying

1 Q. Yes. All the things that you just went  
 2 through that she was complaining about.  
 3 A. There were several staff that complained or  
 4 had concerns about the inability to lock youth down for  
 5 a determined amount of time for behavior. There were  
 6 several staff that had concerns with their schedule  
 7 changing. There was a handful of staff that had  
 8 concerns with how I wanted the youth to be supervised,  
 9 following the policy that is written for the Department.  
 10 Q. Who are the ones who expressed concerns to you  
 11 about safety?  
 12 A. Lisa Littlefield expressed concerns to me  
 13 about safety after there was an incident in the gym  
 14 where a youth was assaulted by another youth and she and  
 15 another staff member were engaged either in conversation  
 16 or reading a magazine when this occurred. And so when I  
 17 addressed them, Lisa Littlefield had concerns that my  
 18 expectations of how they were to be placed in the gym  
 19 and how they would be supervising would create a less  
 20 safe environment.  
 21 So I referenced the policy and I referenced  
 22 the training that we had that spoke to what I was asking  
 23 to be done.  
 24 Q. What were you asking to be done?  
 25 A. That youth not group up in the gym and visit,

1 to any of my e-mails that spoke to placement or the way  
 2 that you observe the youth. I know I addressed her on a  
 3 few different occasions for that. Her responses usually  
 4 didn't pertain to the lack of safety. They usually  
 5 pertained to her feeling like she was being disrespected  
 6 by the expectations that I was putting out.  
 7 Q. What kind of expectations?  
 8 A. The expectation that she engage with the  
 9 youth, the expectation that she follow the staff  
 10 schedule, the expectation that when notified of shift  
 11 changes that she follows through. The idea that when I  
 12 request to talk to her, that she needs to talk to me  
 13 about program business and be professional.  
 14 Q. Was she unprofessional?  
 15 A. She was unprofessional on a few different  
 16 occasions, and she had been given a written reprimand  
 17 for her unprofessional behavior.  
 18 Q. Did you give her those?  
 19 A. I didn't give her those. I believe Julie  
 20 Cloud and Ashley Jorgensen gave her one. I don't  
 21 remember who gave her the second one. I would have to  
 22 look it up.  
 23 Q. Did they witness that behavior, as far as you  
 24 know?  
 25 A. They had witnessed -- Julie Cloud witnessed

1 the behavior on one occasion, because she and I both  
 2 worked to meet with Gracie and Gracie refused to meet  
 3 with me.  
 4 Q. Did Gracie say why?  
 5 A. Because she said I could meet with her lawyer  
 6 to talk to her about work business.  
 7 Q. How about Addison Fordham?  
 8 A. What about Addison Fordham?  
 9 Q. Did he ever express any concerns or problems  
 10 with your approach to safety and security?  
 11 A. He never did directly to me. He never spoke  
 12 to me. The two times I addressed Addison was due to his  
 13 lack of response during incidents in the facility. And  
 14 he was respectful both times, and after watching videos  
 15 took accountability for his behavior.  
 16 Q. What were those incidents about?  
 17 A. The incidents were on the two occasions where  
 18 a youth was assaulted and he did not engage. He didn't  
 19 stop the behavior from happening through a restraint.  
 20 And then another assault that occurred while he was  
 21 behind staff desk, and not responding to incidents  
 22 within the facility with the sense of urgency that is  
 23 expected. He walked down the hall and watched other  
 24 people passing him when responding and then didn't  
 25 engage when he got to the code.

1 Q. Is it policy to restrain juveniles when they  
 2 are assaulting other juveniles?  
 3 A. It's policy to respond to the incident and  
 4 engage and stop the assault.  
 5 Q. Is it policy to run to the scene of an  
 6 incident if it's reported?  
 7 A. I believe the policy states that you have to  
 8 respond with urgency. I would have to pull the policy  
 9 to see the wording.  
 10 Q. Is there anything in the job description for a  
 11 rehab tech that says that running is required?  
 12 A. There are physical guidelines, but we would  
 13 have to pull that out to look at the physical  
 14 guidelines.  
 15 Q. Anyone in O&A that you considered to be  
 16 belligerent with you?  
 17 A. Gracie was belligerent and Diana Carnell was  
 18 belligerent.  
 19 Q. How about challenging?  
 20 A. Challenging in what manner?  
 21 Q. Of your authority or your -- I would say your  
 22 changes?  
 23 A. Direct challenge came from Gracie Reyna and  
 24 Diana Carnell.  
 25 Q. Did Diana Carnell at some point leave the

1 facility?  
 2 A. She did.  
 3 Q. Did she say why?  
 4 A. She found other employment that suited her  
 5 schedule better.  
 6 Q. At some point did you have a meeting with O&A  
 7 staff and Betty Grimm about these challenges or  
 8 belligerence?  
 9 A. We had meetings every Wednesday for our team  
 10 meeting, and that was addressed a few times.  
 11 Q. How so?  
 12 A. During the conversation that Diana Carnell  
 13 became belligerent in one of our team meetings, she was  
 14 told by me that our conversation was over, that we were  
 15 moving on, that if she wanted to continue, that she and  
 16 I would continue at a later time.  
 17 Q. When Carnell or Littlefield or Ms. Reyna  
 18 expressed these concerns to you, how did you weigh their  
 19 concerns?  
 20 A. Gracie didn't express concerns to me, other  
 21 than that she felt she was being disrespected. And when  
 22 she shared those concerns, I heard them and I worked to  
 23 validate them, and then I problem solved to move on from  
 24 them.  
 25 When Diana Carnell shared her concerns, I

1 heard them if they were in the appropriate setting, and  
 2 I worked to validate them and moved on. I often  
 3 explained to her my reasoning, why we were going in the  
 4 direction we were going and my belief system.  
 5 And Ms. Littlefield and I, when we worked  
 6 through supervision on the floor, it was mostly through  
 7 e-mails. When we had conversations due to violations of  
 8 those, she shared her concerns, I listened, we validated  
 9 them and we problem solved.  
 10 Q. You mentioned a belief system a moment ago.  
 11 What was that belief system?  
 12 A. The belief system is that we support the  
 13 Department direction, that we follow our job guidelines,  
 14 our job description by working on the floor with the  
 15 youth, engaging with the youth, teaching curriculum,  
 16 role modeling, being professional, being respectful.  
 17 Q. Are those things that you believe were not  
 18 happening before you took over?  
 19 A. I don't know what was happening before I took  
 20 over. I know what I spoke to, but other than that I did  
 21 not work on the unit.  
 22 Q. Did anyone tell you that those weren't  
 23 happening?  
 24 A. The only things that I observed that weren't  
 25 happening were the documentation of incidents accurately

1 and the use of room confinement.  
 2 **MR. COLLAER: Counsel, it's noon right now.**  
 3 **We are off the record.**  
 4 **(Discussion off the record.)**  
 5 **(Lunch recess taken from 12:02 to 12:56 p.m.)**  
 6 **Q. (BY MR. SCHOPPE) Any thoughts or anything**  
 7 **you'd want to change that you testified about so far?**  
 8 **A. No.**  
 9 **Q. Any names pop into your head, something you**  
 10 **couldn't recall earlier?**  
 11 **A. No. I didn't spend any time thinking about**  
 12 **it, sorry.**  
 13 **Q. Sometimes that's the best time to have things**  
 14 **pop into your head.**  
 15 **A. No.**  
 16 **Q. With respect to the manner in which juveniles**  
 17 **are treated or how violent incidents are handled, you**  
 18 **testified earlier that they are put through a -- can you**  
 19 **remind me what the first step in the process is. A**  
 20 **contract?**  
 21 **A. In O&A?**  
 22 **Q. Yes.**  
 23 **A. When you have a significant incident of**  
 24 **misbehavior we do a reentry contract.**  
 25 **Q. And then reintegration once those terms are**

1 years since we have done any training that has pertained  
 2 to CRIPA that I've attended.  
 3 **Q. In situations like that where a juvenile**  
 4 **assaults another juvenile, what is done within the**  
 5 **context of CRIPA to protect the rights of the victim of**  
 6 **the assault?**  
 7 **A. I don't know.**  
 8 **Q. In O&A you don't know?**  
 9 **A. You asked in CRIPA, and I don't know in CRIPA.**  
 10 **So are you referencing O&A or CRIPA? The question**  
 11 **wasn't about O&A.**  
 12 **Q. Well, is CRIPA applied to O&A?**  
 13 **A. CRIPA would probably apply to O&A, yes, but**  
 14 **that wasn't the question that was asked. So if you ask**  
 15 **the question differently, I might be able to answer it**  
 16 **differently.**  
 17 **Q. Okay. In the context of CRIPA, is there**  
 18 **anything, are there any policies made pursuant to CRIPA**  
 19 **that ensure that the victim of the assault is protected?**  
 20 **A. Youth that has been assaulted has the right to**  
 21 **press charges. On their own they have the chance to**  
 22 **call in an officer and have those charges filed if they**  
 23 **choose to, if they request to. They also have the right**  
 24 **to speak to a counselor if they feel they need to speak**  
 25 **to a counselor. And then they don't have to interact**

1 fulfilled?  
 2 **A. Yes. Reintegration into their group.**  
 3 **Q. Has anyone ever reported to you their concern**  
 4 **that juveniles are not sufficiently deterred from**  
 5 **engaging in violent assaults on staff and other**  
 6 **juveniles by the new approach?**  
 7 **A. Staff has shared that they feel because we are**  
 8 **not isolating youth long enough, that it creates a**  
 9 **safety risk, because youth can reenter right back into**  
 10 **the community, back in with others in a shorter amount**  
 11 **of time than having a fixed lockdown of so many hours.**  
 12 **Q. How did you respond to those reports?**  
 13 **A. When we speak to best practices, we speak to**  
 14 **being able to give a person, any individual, whether**  
 15 **it's a youth or an adult, you have to give them the**  
 16 **option to make the right choice. And by just locking**  
 17 **someone down for so many hours or so many days, they are**  
 18 **given the option to change their behavior or correct**  
 19 **their behavior. They are just given a fixed timeline.**  
 20 **They are not taught anything. They are not encouraged**  
 21 **to do anything different. They are just punished.**  
 22 **Q. Are you familiar with CRIPA?**  
 23 **A. I am.**  
 24 **Q. Are you trained in that?**  
 25 **A. We have training through POST. It's been**

1 with that youth until they are ready.  
 2 So let's say we had two youths who had gotten  
 3 into a fight that were living in the same pod area, we  
 4 would isolate them until there was a safety plan put in  
 5 place to ensure that the youth is safe.  
 6 **Q. How is the victim isolated?**  
 7 **A. The victim is not usually isolated. The**  
 8 **victim would go on with their daily routine, unless they**  
 9 **engaged in the same behaviors. So if someone was**  
 10 **physically assaulted and they didn't retaliate, they**  
 11 **would go on with their daily programming and we would**  
 12 **meet their needs as they came up. So if they needed to**  
 13 **see medical, they would see medical. If they wanted to**  
 14 **talk to a clinician, they would talk to a clinician. If**  
 15 **they wanted to press charges, we would call law**  
 16 **enforcement.**  
 17 **Q. Have any juveniles ever expressed fear that**  
 18 **juveniles who have assaulted them are reintegrated into**  
 19 **the population too quickly?**  
 20 **A. I don't know if any have ever shared that**  
 21 **concern with me.**  
 22 **Q. Was there an assault on a juvenile named**  
 23 **Chrissy by a juvenile named Allison that you recall?**  
 24 **A. A juvenile named Chrissy by a juvenile named**  
 25 **Allison in O&A?**



1 Q. Yes.

2 MR. COLLAER: If you remember it or have any

3 knowledge of it.

4 THE WITNESS: If you pulled the incident

5 report I could probably give you more information.

6 Q. (BY MR. SCHOPPE) But no independent

7 recollection?

8 A. No.

9 Q. Christine Shatto or Allison Rogers, does that

10 help any more?

11 A. It doesn't, no. But I would be willing to

12 look at documentation to revisit if you want.

13 Q. When you were assigned to the job of unit

14 manager were you given a written job description?

15 MR. COLLAER: Unit manager of where, when?

16 Q. (BY MR. SCHOPPE) In O&A.

17 A. I was not given a written description that I

18 recall, but you can pull it up online and you can review

19 them on the Internet at any time.

20 Q. Were you ever given a memorandum or letter of

21 any kind from either Betty Grimm or Sharon Harrigfeld

22 that outlined the scope of your authority there?

23 A. No.

24 Q. Or anything called a memo of understanding?

25 A. The only letter that you are given when you

1 A. I'm not aware.

2 Q. How about since you became unit manager in

3 O&A, have they increased, decreased, stayed the same,

4 violent incidents?

5 A. For the facility or for O&A?

6 Q. For O&A.

7 A. For O&A in the last year we've decreased.

8 Q. Is that the whole time you've been there?

9 A. The first few months there was an increase in

10 behaviors across the board, and I worked with staff to

11 get them to engage, I worked with staff who were angry

12 and not wanting to be there, who weren't engaging with

13 the youth, who were sharing information with the youth.

14 And so it's my belief that if you are not

15 engaging with the youth and working with the youth and

16 holding the youth accountable, that they are going to

17 misbehave more and there is going to be more incidents

18 until staff start engaging and following the

19 expectations that need to be followed. There was a lot

20 of change, and the first three months were pretty rough.

21 Q. Had there been any problem with violent

22 incidents before you took over?

23 A. There had always been assaults throughout the

24 facility. It's kind of the nature of our facility and

25 the nature of the Department. We have youths that come

1 have employment comes and it explains when you start the

2 position and your rate of pay.

3 Q. Is it illegal to lock down juveniles for up to

4 72 hours?

5 MR. COLLAER: Objection; calls for a legal

6 conclusion. If you know, go ahead. If you don't --

7 THE WITNESS: I don't know if it is illegal.

8 Q. (BY MR. SCHOPPE) Have you ever heard

9 juveniles say they can have their programs changed by

10 assaulting staff or other juveniles?

11 A. I have not heard a youth say that directly to

12 me, no.

13 Q. Has anyone told you they have heard a youth

14 saying that?

15 A. There have been other people who have said a

16 youth has said this, but I have never had youth come

17 directly to me and say, Hey, I'm going to assault this

18 person so I can change programs.

19 Q. Who was it that told you what they had heard?

20 A. I don't know. I've been there for lots of

21 years. I'm sure it's been said probably three or four

22 times.

23 Q. Are you aware of whether violent incidents

24 remain the same, changed, or decreased after Director

25 Harrigfeld took over the Department?

1 in that are aggressive and assaultive, and it's our job

2 to work with them and teach them a different way to deal

3 with their anger. But there's always been behaviors and

4 there will always be behaviors and that's why we are

5 there to work with them.

6 Q. So did I understand you correctly that it was

7 because the staff were angry that violent assaults

8 increased after you took over?

9 A. I believe that was one aspect of the first

10 three months in O&A is because staff were unhappy and

11 disgruntled and sharing some of that information with

12 the youth and not engaging at the level that needed to

13 be engaged, that some of those behaviors were being

14 shown by youth.

15 Q. What was the information that they were

16 sharing?

17 A. There were youth that would come to me and

18 tell me that I was not going to be in O&A anymore

19 because Tom Knoff was going to come back, that staff

20 were suing the facility to get Tom his job back and that

21 they didn't have to listen to me.

22 There were youths that were being told by

23 staff that there were more assaults occurring in O&A

24 since got I here, so the youth would come up to me and

25 say, So staff are telling me that you are the cause of



1 the fights that are occurring, how do you feel about  
2 that? There was staff that weren't engaging with the  
3 youth and would sit back when youth were having behavior  
4 problems on the floor. So those were some of the  
5 examples.

6 Q. Did any of the staff ever suggest that it was  
7 your policies that you brought in and made changes at  
8 O&A that caused the increase in violence?

9 A. I believe that Gracie Reyna said something  
10 like that during one of our meetings, but I don't recall  
11 exactly what was said. I know that Addison Fordham put  
12 something on Facebook that spoke to the schedule that  
13 was derogatory. But I wasn't part of his Facebook so I  
14 don't know exactly what it was. I would have to look it  
15 up to see.

16 Q. Are you Facebook friends with him?

17 A. I'm not.

18 Q. How did you see that?

19 A. Because it was anonymously sent to me from an  
20 e-mail address I didn't recognize.

21 Q. You don't know who sent it to you?

22 A. No.

23 Q. Have you ever called a juvenile a "dumb-ass"?

24 A. Not that I recall.

25 Q. If Gracie Reyna said you had, would she be

1 lying?

2 A. Well, I don't recall doing it. I'm not going  
3 to call her a liar, but I don't recall doing it.

4 Q. Is that the sort of thing you think you would  
5 recall?

6 A. I think I would recall it. It's not a term I  
7 usually use. I don't usually use the term "dumb-ass."

8 Q. Forgive my vulgarity, I'm only going to use  
9 the word once. But have you ever referred to Lisa  
10 Littlefield as a "cunt"?

11 A. No.

12 Q. Have you used that word recently at all?

13 A. I have. We had a staff activity and we were  
14 out and I was referencing on personal time a  
15 conversation that I had that I had said the word "cunt"  
16 in front of someone, and it was probably inappropriate.  
17 That is how it was referenced.

18 Q. What was the staff activity?

19 A. We had an outing that was for staff to get  
20 together recently, where it was off of work time, where  
21 it was our personal time, we were taking vacation or  
22 comp time for anyone who wanted to participate. And I  
23 was having a conversation with two others, Lisa being  
24 one of them, where I was reminiscing about a time where  
25 I used the word "cunt" in a manner in front of someone

1 that I shouldn't have and that it was inappropriate and  
2 embarrassing.

3 Q. Was that with respect to a former employee of  
4 the Department?

5 A. That I was talking to?

6 Q. Who you were applying that word to.

7 A. Yes.

8 Q. Who was that?

9 A. The former employee? I didn't disclose that.

10 Q. I'm asking you now.

11 A. When I was talking to the person, I was  
12 talking to Karin Magnelli in Jackpot and I said there  
13 was a former employee that I called a "cunt" one time.

14 Q. Who was that employee?

15 A. It was Deborah Day, and it was outside of  
16 business, and it was during my personal time that I was  
17 referencing her.

18 Q. Having that conversation with Lisa, is that  
19 something you felt was appropriate at the time?

20 A. No. And afterwards I thought, Holy crud, I  
21 need to not say that because it's not appropriate.

22 Q. Is that the sort of thing that could get  
23 another employee or one of your supervisors disciplined?

24 A. I don't know, because it's on my personal  
25 time. On my personal time I feel like, by policy you

1 need to be representing the Department in an appropriate  
2 or professional manner. Having a casual conversation  
3 and saying, Once I said this about someone, I don't  
4 know. We could probably ask the superintendent or the  
5 Director, they could probably give us better direction,  
6 or HR.

7 Q. Even during staff activity?

8 A. It was an activity that was put together, and  
9 it doesn't get disqualified as a work activity because  
10 we don't get to use work hours, so you have to take  
11 vacation hours or comp hours to attend.

12 Q. After you were assigned to the role of unit  
13 manager, was there a meeting with you and Betty Grimm  
14 and other O&A staff in which Betty Grimm told O&A staff  
15 that they needed to support you and your changes or find  
16 employment elsewhere?

17 A. There were team meetings and I think that was  
18 probably mentioned three times. Betty Grimm and Frank  
19 from headquarters had come down and we had a  
20 conversation. And people in the meetings were  
21 questioning authority, and they were told that if you  
22 are unhappy, that if you are not going to follow the  
23 directions, it's time for you to leave.

24 I don't remember the exact term that was  
25 utilized. The meaning behind it and the meaning that

1 was shared, that if you are not being asked to do  
 2 anything unethical or illegal by your supervisor, the  
 3 expectation is that you do your job. And if you are not  
 4 going to do your job and you are going to be  
 5 insubordinate, it's time for you to leave.  
 6 Q. Is that Frank Riley?  
 7 A. Frank Riley was part of those meetings for  
 8 five or six weeks.  
 9 Q. What is his role at HR, if you know?  
 10 A. He is retired now, but his role was a COPS  
 11 administrator.  
 12 Q. What is COPS?  
 13 A. It oversees district liaisons and grants.  
 14 Q. It was on three different occasions that Betty  
 15 said that or --  
 16 A. I don't know exactly, but I know it was more  
 17 than once that that was said, and it was said by more  
 18 than just Betty.  
 19 Q. Who else said that?  
 20 A. I believe Frank said it, and I'm sure I said  
 21 it.  
 22 Q. Is there a juvenile named [REDACTED] in O&A?  
 23 A. Not currently.  
 24 Q. Was he there at some point since you became  
 25 unit manager?

1 A. There was a youth [REDACTED] that has been in  
 2 the Department for many years that has been in O&A.  
 3 Q. Do you know why he's there?  
 4 A. Well, he's not there now. But while he was  
 5 there it's because he committed crimes in the community  
 6 and was charged by the judge to come to the Department.  
 7 Q. Do you know what the crime was?  
 8 A. I don't remember what the crime was, no.  
 9 Q. Do you know where he is now?  
 10 A. I don't know where he is now.  
 11 Q. Was he on any kind of a special program?  
 12 A. He had been through lots of programming, and  
 13 he was in O&A going to day programming out in the  
 14 community and housed in O&A while he was doing his day  
 15 programming.  
 16 Q. How does that sort of programming work? Is  
 17 that typical or are there lots of juveniles that are  
 18 treated that way?  
 19 A. No. It's atypical for youth that don't fit  
 20 the realm of most of the other programming or they've  
 21 had significant programming and we are working with them  
 22 to try and create a way for them to be successful, a way  
 23 that they can reintegrate into the community.  
 24 Q. Are you aware of why it was thought that [REDACTED]  
 25 might benefit from that kind of program?

1 A. I'm not aware because I wasn't part of that  
 2 planning.  
 3 Q. Do you know if he was allowed to have a  
 4 Nintendo DS game player?  
 5 A. There is a DS that all of the youth can  
 6 utilize. It's still in O&A, higher levels are able to  
 7 play it. He had a personal device that he took with him  
 8 to and from his day programming.  
 9 Q. Is that something that is allowed by  
 10 Department policy, a personal gaming device like that?  
 11 A. It was put in his personals when he returned  
 12 and so it went out in the community with him. So I  
 13 don't know what the policy would be on that.  
 14 Q. Do you know if games of his were picked up  
 15 from his house by Department staff?  
 16 A. I think all of his belongings were picked up  
 17 by Department staff.  
 18 Q. Is that typical for Department staff to do  
 19 that for juveniles?  
 20 A. If the family doesn't have the funds or the  
 21 means to bring youth their belongings so that they have  
 22 clothing or personal belongings, I would hope that it  
 23 would be policy that the Department would aid in that.  
 24 Q. Do you know if he was allowed to go to  
 25 GameStop?

1 A. During his outings?  
 2 Q. Yes.  
 3 A. He was with another program and he was allowed  
 4 to do the outings that that program was doing.  
 5 Q. Do you know if he was placed near a school?  
 6 A. I don't -- I think he was placed in front of  
 7 Meridian High School with the programming that he went  
 8 to.  
 9 Q. Was he a sex offender, as far as you know?  
 10 A. I don't know if [REDACTED] was a sex offender. I  
 11 would have to look up what he was in the Department for.  
 12 Q. Did he ever or did you ever hear him express  
 13 that he was answerable only to you and not to lower  
 14 level staff?  
 15 A. No. But he was an Asperger's kid, and so he  
 16 often got black and white and would often decide who he  
 17 was and was not going to speak to, and sometimes that  
 18 was me and sometimes that wasn't me. There were many  
 19 times where he would not engage with me at all.  
 20 Q. As far as you know, he was diagnosed with that  
 21 by a psychiatrist or physician?  
 22 A. That's what I was informed of, yes.  
 23 Q. Did you ever hear from other staff that he  
 24 expressed that belief?  
 25 A. Which belief?

1 Q. That he wasn't answerable to anyone other than  
 2 you.  
 3 A. I was told that he was refusing to talk to  
 4 people and he was demanding to talk to me on occasion.  
 5 Q. Did you supply him with a gift card or gift  
 6 cards at any time?  
 7 A. He got gift cards through religious services  
 8 and he requested those using a religious service form.  
 9 Q. Is that something that any juvenile can do?  
 10 A. It's utilized for juveniles that are going  
 11 into the community and their families don't have means.  
 12 Any juvenile can apply for it, but religious service  
 13 goes through a process of determining if it's necessary  
 14 or not.  
 15 Q. Are you aware of whether juveniles ever  
 16 participated in interviewing job applicants?  
 17 A. If juveniles interviewed job applicants?  
 18 Q. Yes.  
 19 A. When I interviewed for a Solutions technician,  
 20 we went through the entire process, and we had our top  
 21 two candidates come in to meet the youth, and the youth  
 22 were able to talk to them about how they worked with  
 23 youth, what their opinion of incarcerated youths were,  
 24 how they felt about different crimes to see how they  
 25 reacted to the questions and to the youth in general.

1 Q. Was that a question-and-answer format?  
 2 A. It was a conversational format. Some of the  
 3 youth were given the opportunity to create questions.  
 4 So I don't know if all of them did. But it was  
 5 conversational in how they spoke to each other.  
 6 Q. Did anyone ever voice an objection about that,  
 7 any of the applicants?  
 8 A. No. The applicants didn't voice a concern to  
 9 myself. I believe we hired one of them. I don't  
 10 remember if we hired both of them.  
 11 Q. Do you know if objections were ever raised by  
 12 the applicants to anyone else?  
 13 A. Not that I'm aware of.  
 14 Q. Did anybody else think that was a good or a  
 15 bad idea, specifically a bad idea?  
 16 A. No one ever addressed me with it, but HR at  
 17 some point contacted me and said there were complaints  
 18 that that was occurring and that for the time being we  
 19 couldn't have interviewees spend any time in that format  
 20 with the youth. I was told that if I wanted to be able  
 21 to see how the youth interacted with potential staff  
 22 members, I can bring them in and we could do lunch in  
 23 the cafeteria with the youth to watch reactions.  
 24 Q. What happens when the juvenile expresses a  
 25 desire to kill or hurt himself?

1 A. Suicide precautions are implemented. Whoever  
 2 the youth is expressing those to would work with the  
 3 youth. For counseling purposes, they would notify  
 4 either the unit's clinician or they would notify a  
 5 suicide evaluator to do an assessment for the youth, and  
 6 the youth would be put on precautions. And then  
 7 depending on the level of precautions, the youth would  
 8 be monitored for that level.  
 9 Q. There are three levels; is that right?  
 10 A. That's correct.  
 11 Q. Can you describe what the levels are?  
 12 A. Level 1 is the lowest level, so it's for a  
 13 youth who has voiced concerns or shown behaviors but has  
 14 no plan and/or no means to complete the suicide. It is  
 15 a maximum of 15-minute checks. It's working with  
 16 clinicians, working through issues, making staff aware,  
 17 completing an incident report.  
 18 Level 2 is a more significant risk, where a  
 19 youth either has a plan or has means and has voiced  
 20 behaviors or concerns or shown behaviors where staff  
 21 feel that they need to be monitored more often. That is  
 22 a maximum of a 10-minute check if the youth is in their  
 23 room. An incident report is created and a clinician is  
 24 made available for the youth.  
 25 Level 3 is our highest risk, and that is a

1 youth that needs constant supervision because they've  
 2 attempted suicide or they've had a significant suicidal  
 3 behavior, they have a plan, they have a means, they are  
 4 talking about when they are going to do it, how they are  
 5 going to do it, where they are going to do it. And  
 6 staff are assigned a constant supervision of them, and  
 7 that is documented. And they are met with a clinician,  
 8 and then they do an incident report, and we keep working  
 9 with them to get them off the precaution.  
 10 Q. Is it ever the case that a juvenile is  
 11 assigned a particular precaution, for example, a level  
 12 2, which is not eyes on, but where instructions are  
 13 actually issued to maintain constant eyes on, in other  
 14 words, a mismatch between what is actually done versus  
 15 what is written down in a report?  
 16 A. I think that when you have a youth on any kind  
 17 of level of suicide precautions that staff engage at  
 18 their level of comfort. So if they feel like they need  
 19 to engage at a level 3 and they want to do constant eyes  
 20 on because they are worried about a youth, they should  
 21 have the ability to do that.  
 22 Q. Are precaution levels recorded as part of, or  
 23 gathered as part of PbS data?  
 24 A. For suicide behaviors the information is  
 25 gathered.

1 Q. And the relative levels?  
 2 A. No. The levels don't have any play into Pbs.  
 3 Q. So it's on or off?  
 4 A. On or off, yes. Time and date on and time and  
 5 date off, and if there was any self-harm or injuries  
 6 that went with it.  
 7 Q. Are you aware of a situation involving Jessy  
 8 Hinkle where her confidential papers were left in a pod?  
 9 A. No. You have the wrong person.  
 10 Q. How about Littlefield?  
 11 A. Lisa Littlefield, recently I was creating, I  
 12 have a tracking -- I don't have it. The Department has  
 13 a tracking device for supervisors that pertains to  
 14 leave, how leave is used, how many vacation days you  
 15 take, how many sick days you take, what is scheduled and  
 16 not scheduled, coming in late, hours worked.  
 17 I create those calendars and I keep them in  
 18 the personnel files. I had printed Lisa's off. I had  
 19 left it in a pod when I went in there to -- I don't even  
 20 know what I was retrieving when I went in there for a  
 21 reason. And then I went back into that pod when I  
 22 remembered I had left it, and Lisa had taken it off the  
 23 desk and put it into her personal bag. She had talked  
 24 to me about the information. I took accountability,  
 25 I apologized for it.

1 A. The only time I ever heard about it is through  
 2 the lawsuit.  
 3 Q. One of the issues that has come up is with  
 4 respect to scheduling, as you testified. What are  
 5 criteria that are used to decide which staff are  
 6 assigned to which holidays?  
 7 A. Holidays I try -- the main holidays are  
 8 Thanksgiving and Christmas. And the first holidays that  
 9 we went through in O&A when I was the supervisor was  
 10 last year was the Christmas and the Thanksgiving  
 11 holidays, were the only ones I heard concern about. The  
 12 way that I went through and did it is I looked at prior  
 13 years, who had had those holidays off, and then the  
 14 people who had had them off for prior years were  
 15 scheduled to work.  
 16 Q. Do you know which holidays Lisa Littlefield  
 17 was assigned to work last year?  
 18 A. I would have to look it up. I know she worked  
 19 Christmas because she was upset about that, and she and  
 20 I exchanged e-mails about it, and I explained to her  
 21 that she had had several Christmases off for previous  
 22 years and that we needed to allow everybody to have the  
 23 opportunity to have that time off.  
 24 Q. Hadn't she had a different set of job duties  
 25 as transport coordinator in previous years?

1 The information on that document isn't  
 2 confidential. It is anything that anybody can look up.  
 3 It's part of the schedule. It's just a way for me to  
 4 organize the schedule. So all of the data on that  
 5 document can be found by looking at a schedule for  
 6 anyone on the Intranet that everybody has access to.  
 7 Q. How about juveniles?  
 8 A. Juveniles can't have access to it and don't  
 9 have access to it. I don't believe any juveniles had  
 10 access to this form because it's on a staff desk.  
 11 Q. Was [REDACTED] ever on O&A during your time  
 12 there as unit manager?  
 13 A. I don't remember if [REDACTED] was there  
 14 during my time or not. I would have to look at his  
 15 timeline.  
 16 Q. He was Dr. Richard Pines' foster son, does  
 17 that ring a bell?  
 18 A. No.  
 19 Q. Are you familiar with the name Dr. Richard  
 20 Pines?  
 21 A. I think he's been brought up in the lawsuit,  
 22 but I don't know him, I never met him.  
 23 Q. Have you ever heard -- did anyone ever express  
 24 to you concern that Dr. Pines was acting inappropriately  
 25 with [REDACTED]

1 A. She was a rehab technician, and she had a task  
 2 of the transport coordinator, and she was removed from  
 3 that task at some time. I don't know when that  
 4 occurred. I know she was a rehab tech when I came on.  
 5 Q. Did she explain to you that the reason she had  
 6 had prior holidays off was because the transport officer  
 7 position was not a holiday position?  
 8 A. She and I had that conversation, and I shared  
 9 with her that it was my understanding that she was still  
 10 a rehab technician and she still had all the  
 11 expectations of a rehab technician during that position,  
 12 and that she was assigned to help out in coverage, and  
 13 that her supervisor at that time chose to give her those  
 14 holidays off.  
 15 Q. Did you actually assign her to Thanksgiving,  
 16 Christmas, and New Year's in 2012?  
 17 A. I would have to look.  
 18 Q. If she testified to that, would you have any  
 19 reason to doubt her?  
 20 A. I would need look. I don't know.  
 21 Q. Would that be typical for an employee to be  
 22 assigned to all three holidays in one year?  
 23 A. I try to assign to be fair. I try and give  
 24 people off time that they didn't have off the year  
 25 before, and the people who did have it off I tried to



1 get them to work. So I'm trying to rotate them back and  
2 forth. And then I have some people that volunteer to  
3 work the holidays, and then I work them also.

4 Q. Did she volunteer to work those holidays?

5 A. No, she did not. She was assigned to work  
6 because she had the prior years off.

7 Q. Did you feel it was fair to assign her to all  
8 those holidays?

9 A. Christmas and Thanksgiving were the only ones  
10 that were spoken of. We didn't really talk about New  
11 Year's.

12 Q. Did you discuss Ms. Littlefield's scheduling  
13 with respect to her desire to spend evenings with her  
14 nephew?

15 A. We had talked about -- when we were first  
16 creating the schedule, I had talked about different  
17 needs and people who had different needs due to  
18 different reasons, and Lisa said she needed to work the  
19 a.m. shift Monday through Friday so she could spend time  
20 with her 18-year-old nephew.

21 Q. You denied that request; right?

22 A. I did deny that request.

23 Q. Why did you deny that?

24 A. Her 18-year-old nephew who was at home, not  
25 going to school, doesn't need supervision because he's

1 an adult. So he wouldn't have to go to daycare, so  
2 there would be no financial burden for putting him in  
3 daycare. And if you have someone who is home during  
4 a.m. and p.m. hours, you can spend time with them during  
5 a.m. or p.m. hours. The focus that I had was a  
6 financial burden, and I did not see a financial burden  
7 that was being caused to Lisa.

8 Q. Did someone tell you they would have a  
9 financial burden for daycare?

10 A. There were a few staff that I worked with for  
11 financial burden and for -- there is one other staff  
12 that we work with that has a second job that I try and  
13 work with the evenings of Wednesdays and the mornings of  
14 Sundays, when the schedule allows he doesn't work those  
15 shifts because of his second job. But if it's not  
16 allowed and then he needs to cover and he's scheduled to  
17 cover, then he needs to work those shifts and work with  
18 his peers to be able to change his schedule. But those  
19 are his set days to work.

20 Q. How about church time, is that something that  
21 is accommodated?

22 A. We work the best we can to accommodate it.  
23 But church is offered at numerous times throughout the  
24 week, and people have the opportunity to switch with  
25 their peers. So if I go to church Sunday a.m. and three

1 weeks every two months I'm scheduled to work that Sunday  
2 a.m., I can switch with a peer who works that Sunday  
3 p.m. to accommodate my schedule to go to church if  
4 that's when I like to go.

5 Q. Is there any kind of ranking in policy that  
6 says what factors are important or not, daycare versus,  
7 as you mentioned, the nephew being of the age of  
8 majority or church be more important than, say, another  
9 leisure activity?

10 A. No. And I tried not to rank the leisure  
11 activities.

12 Q. Did Ms. Littlefield explain to you that her  
13 nephew is an at-risk youth?

14 A. I believe she shared that he was an at-risk  
15 adult because he's 18.

16 Q. With respect to -- we just talked about  
17 Mr. Bernstein, was it, with his second job?

18 A. No. Mr. Bernstein does not have a second job  
19 that I'm aware of. He might.

20 Q. Who was that?

21 A. Mr. Dave Clason.

22 Q. What is that other job he's got?

23 A. He's a pastor on Wednesday nights and Sunday  
24 mornings, that he gets paid for.

25 Q. Is Mr. Bernstein also on a set schedule?

1 A. Mr. Bernstein is on set p.m.'s with Thursday  
2 and Friday off.

3 Q. How do you determine who gets a set schedule  
4 versus who doesn't?

5 A. I have offered all of the staff that set  
6 schedule in the p.m. with days off between Monday  
7 through Friday.

8 Q. Is that an offer you made to Gracie Reyna?

9 A. It was.

10 Q. When was that?

11 A. When we initially talked about it, we talked  
12 about having a financial burden or a need, and that was  
13 when I first took over. And then we have been working  
14 changing the schedule the last two months, and in the  
15 last -- two weeks ago, in the last month, I met with all  
16 the staff and offered them all the option -- I offered  
17 them three options: I offered them to ability to rotate  
18 through the schedule as they currently are; to rotate  
19 through just the p.m. shift; or to have a fixed p.m.  
20 with a day off between Monday and Friday, because I  
21 don't give fixed weekends off.

22 Q. How long had Mr. Clason and Mr. Bernstein had  
23 those fixed schedules?

24 A. Mr. Bernstein has that schedule I believe  
25 since he started or since he was hired. And Mr. Clason



1 doesn't have a fixed schedule. He has the ability to  
2 have Wednesday nights off by 6:00 and Sunday mornings  
3 off if the schedule allows. If the schedule does not  
4 allow, he is scheduled to work and he has to work with  
5 his peers to trade shifts.

6 Q. How recently was it that you made the offer  
7 for the set schedule?

8 A. In the last month.

9 Q. Before that did Ms. Reyna voice objections to  
10 you concerning the rotation of her schedule?

11 A. No. When she and I talked she said she had  
12 done a rotating schedule prior and that that would work  
13 for her with her other job.

14 Q. In July of 2012 did you and she have a dispute  
15 as to changes made to her schedule?

16 A. I would have to look at the timeline, but I  
17 know she and I had had a dispute over a day that was a  
18 two-hour change in her schedule due to a conflict in  
19 coverage. She was given three weeks notice, I believe,  
20 and she said I did not have the right to change her  
21 schedule and she would not do it and she did not come  
22 in.

23 Q. Had you previously asked her for information  
24 concerning her second job?

25 A. I had not previously asked her, no. I asked

1 that was before I even moved into O&A.

2 Q. Was Mr. Knoff already gone at that point?

3 A. I don't remember. I would guess so, otherwise  
4 I don't know why she would come talk to me.

5 Q. When you had applied for the position of rehab  
6 unit manager, did you ask Joyce Clark to review your  
7 application?

8 A. The first time?

9 Q. Yes.

10 A. Yes, I think I did.

11 Q. What did you guys talk about?

12 A. We didn't talk about anything. I think she  
13 e-mailed me that said something to -- I think she said  
14 three different things. I would have to look at the  
15 e-mail, but there were a couple different areas she said  
16 I needed to focus on.

17 Q. Did she raise supervisory experience as an  
18 area?

19 A. She did.

20 Q. What did she say about that?

21 A. I don't remember. I would have to pull the  
22 e-mail.

23 Q. Do you recall if she told you that she didn't  
24 see any supervisory experience in your application?

25 A. I don't remember what it said, but if you have

1 if she could not work due to her other job, and I don't  
2 believe that she answered the question when it was  
3 asked.

4 Q. Did she relate to you that she had already  
5 given her other job, which is Idaho Corrections  
6 Corporation, the schedule that you had assigned to her?

7 A. I believe she did.

8 Q. Then did you change that schedule after that?

9 A. No. I think the schedule occurred before, but  
10 I don't remember the timeline for sure. I think the  
11 two-hour change in schedule was coming in at 2:00 rather  
12 than 4:00 because we didn't have coverage from 2:00 to  
13 4:00, and I don't think that any of the complaints or  
14 concerns came from Gracie until after that change in  
15 schedule. She had a three-week notice, I believe, about  
16 the two-hour change. And that is when the e-mails went  
17 back and forth about why she could not come in to work.

18 Q. Was Gracie one of the O&A staff who expressed  
19 concern about the loss of the ten-hour scheduling?

20 A. Not to me. When we met initially, she came to  
21 meet with me in my office prior to me coming down to O&A  
22 and shared she had concerns with the schedule as it was  
23 written now. And I told her I had no say over how the  
24 schedule was written now. She shared at that time that  
25 when they rotated before that that worked for her, and

1 the e-mail I could probably reference it.

2 Q. After you became the O&A unit manager, you  
3 testified that several of the staff were angry. I've  
4 got a list of people I'm going to read to you, and if  
5 you can tell me if they were angry and what they were  
6 angry about according to the best of your recollection.

7 We talked about Ms. Littlefield and Ms. Reyna.  
8 How about Philip Gregston?

9 **MR. COLLAER: Object to the form of the**  
10 **question; calls for speculation as to Mr. Gregston's**  
11 **state of mind. If you know what he was thinking at that**  
12 **time, go ahead and answer. If you don't, then don't.**

13 Q. (BY MR. SCHOPPE) It's actually less about  
14 what he was thinking and more about what you were  
15 thinking. Did you believe he was angry --

16 **MR. COLLAER: If you have a perception or an**  
17 **opinion about his state of mind at that time, then go**  
18 **ahead and say whatever your state of mind was.**

19 **THE WITNESS: I don't know what Mr. Gregston**  
20 **was thinking at that time.**

21 Q. (BY MR. SCHOPPE) Did you know that Lisa  
22 Littlefield was angry?

23 **MR. COLLAER: Same objection.**

24 **THE WITNESS: Lisa Littlefield shared that she**  
25 **was angry.**

1 Q. (BY MR. SCHOPPE) Did you know that Gracie  
2 Reyna was angry?

3 MR. COLLAER: Same objection.

4 THE WITNESS: Gracie Reyna shared that she  
5 felt disrespected.

6 Q. (BY MR. SCHOPPE) Did Mr. Gregston say  
7 anything to you along the lines that he was upset or  
8 angry or anything like that at all?

9 A. Mr. Gregston came to me a few months into my  
10 employment and shared with me that he was angry with  
11 some of the changes, he was frustrated with the other  
12 staff members and was frustrated with the process and  
13 had to make a choice, either he was going to personally  
14 make the change to come to work and do his best to be  
15 there or he was going to leave, and I said okay.

16 Q. Who was he frustrated with?

17 A. I think he was frustrated across the board.  
18 He was frustrated with his coworkers because he felt  
19 they weren't doing their job and he was frustrated with  
20 the changes, and that is what he shared.

21 Q. As far as you know, was Diana Carnell angry?

22 A. Diana Carnell shared with me that she was  
23 angry that she got confronted for reading a book. She  
24 shared in a team meeting she didn't like being told that  
25 she needed to either do her job and follow the

1 and the breaks I took to do that for pumping. And then  
2 I didn't hear back from her again until the letter came  
3 out, and it had different reasons why.

4 Q. Do you know what those reasons were?

5 A. She spoke to being concerned about  
6 breastfeeding and the scheduling and those were the only  
7 two things I can recall.

8 Q. Did you tell her she had to take a p.m.  
9 schedule?

10 A. I don't recall telling her she had to take the  
11 p.m. schedule. I told her it was an option because she  
12 said it would work better for her, because I believe her  
13 husband worked in the day.

14 Q. Did you make any effort to accommodate her  
15 need to breastfeed or anything like that?

16 A. She never came back, so I wasn't given that  
17 opportunity.

18 Q. Did Todd Inman ever tell you he was angry or  
19 express any sentiment like that to you?

20 A. Not that I recall. I know he went on leave  
21 for medical shortly after I came down, and then he also  
22 resigned and wrote a letter of some sort about reasons  
23 he resigned.

24 Q. Did you ever see the letter?

25 A. I don't recall if I saw the letter or if I was

1 directions she was being given or it was time to leave.  
2 She shared that she was frustrated with the change in  
3 schedule because she had a fixed schedule prior to that.

4 Q. How about Robin Smythe?

5 MR. COLLAER: Same objection. If you know.

6 THE WITNESS: Sure. Robin Smythe was on  
7 maternity leave.

8 Q. (BY MR. SCHOPPE) Did she return?

9 A. She did not return.

10 Q. Do you know why?

11 A. I believe she wrote -- I know she wrote a  
12 letter to someone. She wrote a letter stating that she  
13 wasn't coming back, but I don't know why.

14 Q. Did you see the letter?

15 A. I don't remember if I saw the letter or if I  
16 was told about the letter. But I know that she and I  
17 had a conversation at one time about coming back and the  
18 different scheduling and how that was going to work for  
19 her. I talked to her about the financial burden that it  
20 was going to cause for daycare, because I believe she  
21 had three kids. And we talked about working a p.m.  
22 shift that was fixed so that her husband could be home  
23 in the days. We talked about that.

24 She talked about breastfeeding. I explained  
25 when I had had my son how I went through breastfeeding

1 just informed of the letter. And it had various reasons  
2 of discontent.

3 Q. Did those relate to changes at O&A?

4 A. I think they were Department in general  
5 feelings. I don't remember if it was particular to O&A  
6 or if it was just an overall discontent.

7 Q. Was there a PREA incident involving KS  
8 Seifrit that Todd Inman was also involved with.

9 A. I don't recall Todd Inman being involved in  
10 that incident.

11 Q. Can you tell me what occurred in the incident  
12 itself?

13 A. Sure. There was a youth, KS that was in  
14 the gym -- in the classroom, Mr. Winkler's classroom,  
15 and another youth had brushed the side of her in her  
16 breast area, and she felt violated. She shared that  
17 with Diana Carnell. I believe she shared it with Gracie  
18 Reyna, and she might have shared it with two other  
19 staff. Todd Inman might have been one of them.

20 She shared it with the staff during PE, and  
21 then the staff called me in and KS shared the  
22 information with me. And then we went through a process  
23 of determining who was going to do the documentation.  
24 By policy, the first person that is informed of the  
25 incident or the person aware of the incident is supposed

1 to do the documentation. And the people that were first  
2 informed of that chose not to do the documentation. And  
3 when confronted during a team meeting that the  
4 documentation needed to done, voiced that they weren't  
5 going to do it. And then I went through a process of  
6 interviewing KS completing the documentation and  
7 writing the IR and turning the forms in and reviewing  
8 the video.

9 Q. Did you tell KS or anyone else that the  
10 interaction wasn't a PREA incident?

11 A. I told KS I wasn't sure if it was a PREA  
12 incident because I hadn't witnessed it and that it was  
13 outside of the clothes on the side of her -- above her  
14 abdomen on the side, and so I didn't know, but I would  
15 have to do an investigation on it. I would have to  
16 watch the video, that I would do the documentation and  
17 somebody else would do the investigation piece.

18 Q. Is the presence of clothing a factor in  
19 determining whether something is a PREA incident or not?

20 A. I don't know that it always is or that it ever  
21 is, I'm not sure.

22 Q. Do you know how soon after KS reported the  
23 incident to Ms. Carnell, Ms. Carnell came to you?

24 A. I don't know if Ms. Carnell or Ms. Reyna came  
25 to me. Maybe it was Ms. Carnell. But it was -- I think

1 it occurred in a classroom, then she, Ms. Carnell, and  
2 some others took the youth back to change into PE. So I  
3 don't know if lunch occurred in between that time. And  
4 then when they were in the gym I think is when the staff  
5 were notified. And then I happened to be walking by the  
6 gym and one of the staff stuck their head out and said,  
7 Hey, KS has a concern. And I met with KS in the  
8 hall outside the gym.

9 Q. Was it your understanding that this had just  
10 occurred within the last hour perhaps?

11 A. I know it occurred that day, yes, because she  
12 said earlier today in Mr. Winkler's class.

13 Q. Do you know why it was that either Ms. Carnell  
14 or Ms. Reyna, whomever it was, brought it to you?

15 A. They didn't talk to me. They just said KS  
16 had information to share. KS said that when she was  
17 in the gym the other youth, the kid that had allegedly  
18 touched her on the side, was in the gym also. She said  
19 she was uncomfortable, and so I offered to take her out  
20 to PE. I said, If you are not comfortable in the gym,  
21 do you want to go out to the outdoor rec, do you want to  
22 go to the basketball court, do you want to be done with  
23 PE, do you want to go shower? What do you want to do?  
24 Where do you feel safe?

25 And she said, I don't want to do any of those

1 things. I said, Then how can I help you? She said, I'm  
2 just going to go back into the gym and I'll just sit and  
3 stay away from him. I said, Are you sure you are going  
4 to be okay with that? And she said, Sure.

5 I don't remember if those were the exact  
6 words, but that was the sentiment of the conversation.  
7 And then she went back in the gym.

8 Q. Did KS file a complaint against you of some  
9 sort after that?

10 A. I believe she filed a grievance at some point  
11 that spoke to the incident. I don't remember exactly  
12 which part of the incident, if it was feeling like it  
13 hadn't been addressed or if it was because she had to go  
14 back and be around the same youth. I don't remember the  
15 basis of the concern. I would have to look at the  
16 grievance.

17 Q. Did you follow up with KS about her  
18 complaint?

19 A. I did. Betty Grimm is the -- the way that  
20 grievance is and the grievance is written, Bobbi Rogers  
21 puts it into a computer system that shows the grievance  
22 and then it goes to the superintendent, and then the  
23 superintendent gives it to the supervisors.

24 Betty Grimm gave me that one. I addressed  
25 Betty, I said, This grievance seems to be on me, are you

1 sure you want me to address it? She said, Yeah, I think  
2 it will be fine. Go ahead and address it. If there is  
3 any concerns, let me know and I'll address it, and so be  
4 it.

5 I went and met with KS while she was in the  
6 cafeteria. I asked her if she was comfortable meeting  
7 with me because the grievance was written and it had my  
8 name on it. She said she was. She asked me why the boy  
9 was not removed from the gym after the incident. And I  
10 said because I hadn't had time to even look at it, and  
11 that would be me calling him guilty before I had a  
12 chance to review it. And the way that it happened is I  
13 gave you the option so I could keep you safe and we were  
14 going to move you anywhere you wanted to go to be  
15 comfortable and you wanted to go back to the gym, and  
16 that is why you went to the gym and I didn't remove him.

17 The two youths didn't live in the same pod,  
18 and so their interactions were fairly limited. And I  
19 shared all that with her. And she said she was okay  
20 with that and thanks for sharing the information.

21 Q. Did you discuss the incident at all with  
22 Mr. Inman?

23 A. With Mr. Inman?

24 Q. Yes.

25 A. I don't remember discussing the incident with

1 Mr. Inman. Doesn't mean it didn't happen, but I don't  
 2 remember that happening.

3 Q. How about Dave Hottell, did he ever express  
 4 anger or upset or frustration to you about the policies  
 5 that had changed?

6 A. Dave Hotell was not there the whole time I was  
 7 back at work. He was out for -- I don't remember him  
 8 being there. He was out for knee surgery I believe, and  
 9 he came back for one day and I was on vacation the day  
 10 he came back, and then he quit.

11 Q. Do you know when he quit?

12 A. I don't have a date, no.

13 Q. Did anyone tell you why he quit?

14 A. No. I don't even think he told me why he  
 15 quit. I'm not even sure who he resigned to. I don't  
 16 remember if it was me or someone else.

17 Q. Since one of the concerns you had coming in as  
 18 O&A unit manager was staff coverage, with the number of  
 19 people that we just talked about resigning or quitting  
 20 or -- was anyone terminated?

21 A. No.

22 Q. How did that impact coverage?

23 A. It was horrible. People were calling off  
 24 people, people were choosing to quit without notice,  
 25 people were taking leave and then quitting. So I worked

1 thinking. I can't read their minds.

2 Q. (BY MR. SCHOPPE) Not my question. Did you  
 3 ever form an opinion?

4 MR. COLLAER: It's been asked and answered.

5 MR. SCHOPPE: No, it hasn't.

6 MR. COLLAER: If you had an opinion at that  
 7 time about why they were quitting, then go ahead and say  
 8 what it was. If you don't, you don't.

9 THE WITNESS: My opinion at the time about why  
 10 they were quitting is because they were unhappy and  
 11 there was a change in their schedule and they didn't  
 12 like it.

13 Q. (BY MR. SCHOPPE) Did you ever consider the  
 14 reasons for which they were quitting might have been  
 15 concerns about the policies that you were enacting?

16 A. That wasn't my belief.

17 Q. Did anyone ever tell you that was why they  
 18 quit?

19 A. Because they were being asked to follow the  
 20 policies and do the job requirements?

21 Q. No, not my question.

22 Did anyone ever tell you the reason they quit  
 23 was because they disagreed with your policies?

24 A. They are not my policies, so no.

25 Q. Whose policies were they?

1 the floor, other supervisors worked the floor. I had  
 2 staff from other facilities come and help out. I had a  
 3 temp pool that I utilized to do coverage. We made it  
 4 work, but it was very difficult and very uncomfortable  
 5 for a lot of people, and we did our best until I was  
 6 able to rehire.

7 Q. Is it your position that the reason these  
 8 people quit or did these things you just described,  
 9 called in sick or whatever it was, was because they were  
 10 angry?

11 MR. COLLAER: Objection; calls for speculation  
 12 as to the state of mind of unnamed individuals. If you  
 13 know what he's asking or what they were thinking, go  
 14 ahead.

15 THE WITNESS: I don't know what they were  
 16 thinking.

17 Q. (BY MR. SCHOPPE) Was that your belief?

18 MR. COLLAER: Same objection.

19 THE WITNESS: I don't know what they were  
 20 thinking.

21 Q. (BY MR. SCHOPPE) Did you ever form any kind  
 22 of opinion as to why they were doing these things?

23 MR. COLLAER: Same objection; calls for  
 24 speculation.

25 THE WITNESS: I don't know what they were

1 A. What people were being asked to do was come to  
 2 work and do their job. What people were being asked to  
 3 do were the job descriptions. What people were being  
 4 asked to do was follow the schedule that was being  
 5 implemented. I don't believe that any of that is policy  
 6 driven by me. It's just the job.

7 Q. Did someone tell you to make those changes?

8 MR. COLLAER: Objection; it's been asked and  
 9 answered. She didn't make any changes. She already  
 10 said that.

11 MR. SCHOPPE: One, stop with the speaking  
 12 objections, please.

13 Q. (BY MR. SCHOPPE) You instituted some changes  
 14 about scheduling and things like that; right?

15 A. Correct.

16 Q. Did someone tell you to make those changes?

17 A. No.

18 Q. Those were solely at your discretion?

19 A. Those were my discretion.

20 Q. Is it your belief that people weren't doing  
 21 their jobs before you came on the scene?

22 A. It was the belief that we didn't have enough  
 23 staff to do coverage, and I could see that by looking at  
 24 the schedule. It was my belief that staff were not  
 25 working on the floor with the youth, because I could see



1 that by the time I spent on the floor. It was my belief  
 2 that there were not classes being taught on a consistent  
 3 regular basis with curriculum, because I could see that  
 4 by being on the floor.  
 5 Q. How did you see these things?  
 6 A. Because I was at the building working and  
 7 sitting in the pods and spending time there.  
 8 Q. Have you ever monitored any of your own O&A  
 9 staff over the video system?  
 10 A. I have. Not during a video system because I  
 11 don't have access. But when there has been events or  
 12 when there has been restraints, I have asked for the  
 13 video for those events or those restraints.  
 14 Q. Who do you have to ask for that?  
 15 A. You have to go through the superintendent and  
 16 IT. And then Mark Freckleton, who is a safety and  
 17 security supervisor, or Julie McCormick, who is a safety  
 18 and security officer, also has access to videos.  
 19 Q. With respect to lockdown time, that is a  
 20 policy change that you made; isn't that right?  
 21 A. Policy change. The procedure changed.  
 22 Q. That was your set of changes?  
 23 A. Not locking youth down while staff had lunch  
 24 or had breaks? Yes.  
 25 Q. Was there a specific policy that you were

1 referring to in terms of PbS or anything like that in  
 2 making that change?  
 3 A. I made that change because the job description  
 4 states that you will work with the youth.  
 5 Q. Well, is there only one way to do that?  
 6 A. If youth are locked down in their room, you  
 7 can't work with them.  
 8 Q. Were those lockdowns ever the result of  
 9 understaffing?  
 10 A. They were, and that is one of the reasons for  
 11 the schedule change was to ensure we had coverage to the  
 12 best of our ability to be able to work with the youth.  
 13 Q. Is it the case that you assigned rehab techs  
 14 to manage the control booth?  
 15 A. The O&A control booth -- the main control  
 16 booth?  
 17 Q. The main control booth.  
 18 A. No, that was before me.  
 19 Q. How about the O&A control booth?  
 20 A. There is nothing in that to man.  
 21 Q. Have you had any concerns with placing rehab  
 22 techs -- is it correct to say that rehab techs are  
 23 sometimes assigned to work in the control booth?  
 24 A. When I first took over O&A the prior  
 25 supervisor had arranged with the safety and security

1 supervisor that an O&A staff would cover the main  
 2 control booth in the a.m. hours.  
 3 Q. Is that still the case?  
 4 A. No, it is not.  
 5 Q. Why is that?  
 6 A. Because we need all of our techs on the floor  
 7 for coverage.  
 8 Q. Has anyone ever told you that there is a  
 9 preference against hiring veterans for positions at the  
 10 Department?  
 11 A. No.  
 12 Q. Have you ever heard that?  
 13 A. No. I've heard it in the lawsuit, someone  
 14 claimed that.  
 15 Q. How about the same question with respect to  
 16 correctional officers?  
 17 A. No. I think it's in the lawsuit though.  
 18 Q. Have you ever heard of any incidents involving  
 19 sexual misconduct between staff and juveniles at the  
 20 Department?  
 21 A. For the Department I've heard of two.  
 22 Q. What have you heard?  
 23 A. There was one when I first started working  
 24 with the St. Anthony staff. There was concern he was a  
 25 group leader over the girls unit, and there was a

1 concern with him. And then a youth that came through  
 2 the Relapse Prevention Program. And shortly after that  
 3 concern came out he was arrested, and I believe he still  
 4 remains in prison. And I don't know any more details  
 5 than that. I think he was arrested for an outside event  
 6 that happened in a park. I am not sure all the details.  
 7 And then the Julie McCormick case that is  
 8 currently in court.  
 9 Q. With respect to making reports to the Idaho  
 10 Department of Health and Welfare, is there anything that  
 11 says who it is specifically is supposed to make a report  
 12 of sexual abuse to the Department?  
 13 A. The person who is first notified.  
 14 Q. So that person is supposed to pick up the  
 15 phone and call Health and Welfare immediately?  
 16 A. I believe there is a time frame, I don't know  
 17 the time frame, I would have to pull the policy. But I  
 18 think there is a time frame that you have to call and  
 19 make a report either to Health and Welfare or the local  
 20 police that a youth has made an allegation.  
 21 Q. Is there any policy that says that supervisors  
 22 need to be notified of that before a call is made?  
 23 A. Before a call is made?  
 24 Q. Yes.  
 25 A. Not that I'm aware of.



1 Q. Or at any point?  
 2 A. The supervisor of the unit where the behavior  
 3 occurred?  
 4 Q. Right.  
 5 A. Yes, the supervisor should be notified. I  
 6 don't know if that is in policy, but it would make sense  
 7 that that could be in policy.  
 8 Q. Would that be something that an incident  
 9 report should be created for?  
 10 A. When there is a disclosure an incident report  
 11 is created. And Form 131 is created and there is a  
 12 notification process on the bottom of 131 that has seven  
 13 to nine people that you can document that you've  
 14 notified.  
 15 Q. Regardless of whether it's a written policy,  
 16 is there a practice at the Department where reports of  
 17 sexual conduct are passed up the chain through  
 18 supervisors?  
 19 A. No. The person who it's reported to is the  
 20 person who is advised to make the call.  
 21 Q. Did anyone ever tell you that you were  
 22 transferred to O&A to clean house?  
 23 A. No.  
 24 Q. Did you ever hear anybody say that about you?  
 25 A. I'm sure there was gossip about it.

1 Q. Did you ever hear that though?  
 2 A. No one ever said that directly to me, no.  
 3 Q. Did you ever hear that from Betty Grimm?  
 4 A. No.  
 5 Q. Did you ever hear that Betty Grimm had said  
 6 that?  
 7 A. No.  
 8 Q. Do you know who made the decision to place  
 9 [REDACTED] who we discussed earlier, into that  
 10 program?  
 11 A. I would assume his JSC, that would be his  
 12 aftercare manager.  
 13 Q. Do you ever participate in those sorts of  
 14 decisions or do you know what kind of considerations are  
 15 taken into account?  
 16 A. I know that recently I have been included in  
 17 those. [REDACTED] was prior to me, so I wouldn't have  
 18 been part of that. But there was other youth that they  
 19 have asked to do special programming in O&A and they've  
 20 been denied. We don't have the ability to house them  
 21 and still take in all the other youth that we do. And I  
 22 know that our current superintendent didn't support the  
 23 idea, so she has not allowed that.  
 24 Q. Is the propensity to violence of any  
 25 particular juvenile taken into account in deciding

1 whether to send them out into community programs?  
 2 A. The community protection is always taken into  
 3 account. So when a youth is sent to another program,  
 4 it's looked at. What the expectations of the program  
 5 are going to be, how they are going to be monitored,  
 6 what their level of need for monitoring is, all of those  
 7 things are taken into account. And that is usually  
 8 through a juvenile service coordinator and the treatment  
 9 team they are working with that would make those  
 10 decisions.  
 11 Q. After the filing of this lawsuit, which  
 12 occurred June of 2012, did you ever have any discussions  
 13 with Sharon Harrigfeld about the Plaintiffs' claims?  
 14 A. I don't recall ever talking to her about the  
 15 lawsuit.  
 16 Q. How about Julie Cloud?  
 17 A. I don't think I've ever talked to her about  
 18 the lawsuit, other than how it affected me. I asked for  
 19 a meeting once with risk management and there was an  
 20 attorney there.  
 21 **THE WITNESS: Were you there? Was it you?**  
 22 **MR. COLLAER: (Nodding.)**  
 23 **THE WITNESS: And I discussed, I asked**  
 24 **questions.**  
 25 **MR. COLLAER: Don't --**

1 **THE WITNESS: That was it.**  
 2 **MR. COLLAER: Assert the privilege. Don't**  
 3 **answer that.**  
 4 Q. (BY MR. SCHOPPE) Any other time you discussed  
 5 anything with Julie Cloud?  
 6 A. Not that I recall.  
 7 Q. How about with Betty Grimm, did you discuss  
 8 the lawsuit or the claims with her?  
 9 A. Not with Betty Grimm, no.  
 10 Q. Did you ever discuss the Plaintiffs themselves  
 11 with her in the context of the fact they were suing?  
 12 A. No.  
 13 Q. Did you ever track or monitor any of the  
 14 Plaintiffs, say, with an extra level of scrutiny after  
 15 the lawsuit was filed?  
 16 A. No.  
 17 Q. Did you ever talk with Betty about what the  
 18 Plaintiffs were doing, or communicate with Betty, I  
 19 should say, about what the Plaintiffs were doing, who  
 20 they were talking to, whether they were in or out?  
 21 A. I talked to the superintendent, who was my  
 22 supervisor at the time, about behavioral concerns that I  
 23 was having with some of the Plaintiffs. I talked to  
 24 Betty Grimm about Rhonda walking in front of my office  
 25 often and stopping. I talked to the superintendent

1 about behavior concerns or when my staff would disappear  
2 and be sitting in someone else's office and it didn't  
3 seem to be job related.

4 Q. What was the problem with Rhonda stopping in  
5 front of your office?

6 A. Because I didn't understand the purpose for  
7 it, because her office wasn't down there. And it seemed  
8 just to be just coming down to come down. I didn't  
9 understand the reasoning.

10 Q. Did you ask her?

11 A. I don't think I ever did.

12 Q. Did you ever find out why?

13 A. No.

14 Q. Do you have any reason to believe it was  
15 anything other than work related?

16 MR. COLLAER: **Objection; calls for**  
17 **speculation.**

18 Q. (BY MR. SCHOPPE) Do you have any reason?

19 A. I had no idea what she was doing.

20 Q. How about the other people you were talking  
21 about, the Plaintiffs disappearing, I think you said?

22 A. Yeah. If they would not be on the floor where  
23 they needed to be, I would walk around and do checks,  
24 because I would walk around and do checks to see where  
25 anyone is. I would just wait and if they came back -- I

1 know I approached Lisa once and making sure she was  
2 documenting her breaks.

3 Other than that, I didn't spend a lot of time  
4 talking to people about -- most of them would stay on  
5 the floor where they were supposed to be. When they  
6 were in offices, if I walked by and I'd see them in an  
7 office, that would probably be a break time, and I did  
8 not question it, unless it went -- I don't think I ever  
9 questioned it because it always stopped in an  
10 appropriate amount of time. They have 15-minute breaks  
11 they can take.

12 I did talk to Rhonda once about addressing my  
13 staff and talking to my staff, and that if -- I don't  
14 remember the exact conversation, I have an e-mail or a  
15 document in my office about it on my computer, about how  
16 if she's going to talk to my staff about work issues or  
17 pertaining to work issues, that she needed to send the  
18 staff to me, because she could not solve some of the  
19 supervisory stuff.

20 And she had shared, Rhonda had shared that she  
21 will talk to them when she wants, and she had shared  
22 that if it's on her personal time, then she would. And  
23 I said, That's fine, I'm not questioning your personal  
24 time. My concern is when my staff are coming to you to  
25 complain or to share concerns during work time, I'd like

1 you to send them to me. And her supervisor was present  
2 during that conversation.

3 Q. Is there a policy against employees being able  
4 to complain to other employees?

5 A. Well, the problem with me complaining to  
6 another employee and not addressing it with my  
7 supervisor, is that problem can never be addressed and  
8 there can never be anything put in place to try to amend  
9 it if people aren't notified of the concern.

10 Q. Is there a policy against that?

11 A. I don't believe there is a policy against  
12 that, no. I know that there is probably documentation  
13 that speaks to gossip and there is probably  
14 documentation that speaks to respect and lines of  
15 supervisor.

16 Q. What is gossip?

17 A. What is gossip? Gossip is when you sit and  
18 you talk about, I don't know, crud, gossip stories,  
19 things that are untrue.

20 Q. Did you know what your employees were talking  
21 about with Rhonda?

22 A. I did not. Rhonda just shared that they had  
23 concerns pertaining to me as a supervisor and that they  
24 were sharing those with her. And I told her I couldn't  
25 help to fix those if I didn't know what they were. So I

1 needed my staff to come to me and talk to me so we could  
2 work to solve the problems.

3 Q. Were you trying to prevent your staff from  
4 talking to her?

5 A. No. I was trying to work with my staff to  
6 solve problems.

7 Q. But you were trying to prevent Rhonda from  
8 speaking with your staff.

9 MR. COLLAER: **Misstates her testimony.**

10 THE WITNESS: **That is not what I said.**

11 Q. (BY MR. SCHOPPE) What did you mean?

12 A. I wanted my employees if they had concerns  
13 with me to be able to talk to me about them.

14 Q. Was it that they shouldn't speak to Rhonda or  
15 they should speak to you first?

16 A. I asked Rhonda to send them my way so I could  
17 talk to them if they had concerns.

18 Q. After they spoke with her?

19 A. Either way, just that they came to me. You  
20 can't solve a problem if you don't know the problem  
21 exists.

22 Q. Have any of your employees ever expressed a  
23 concern that they don't think they can work out their  
24 problems with you?

25 A. I think that Lisa one time shared that she was

1 frustrated because when she brought the concern to me  
2 that the change didn't occur, and that had to do with  
3 her schedule.

4 Q. Have you ever had any employees express  
5 concern that the problem-solving process would not be  
6 fair or effective?

7 A. I've never had any of my employees go through  
8 the problem-solving process with me.

9 Q. Was there an incident involving Gracie Reyna  
10 with WH about some ketchup packets?

11 A. There was an incident where a youth, a deaf  
12 youth, had too many ketchup packets, and Gracie was  
13 yelling at him and slamming her hands on the table and  
14 leaning in towards him, demanding the ketchup packets  
15 back.

16 Q. Did you witness that?

17 A. I did witness that.

18 Q. Were there any other witnesses?

19 A. The other youths that were sitting at the  
20 table were all watching her. I don't remember the other  
21 staff that were in there. I addressed it to her as the  
22 supervisor as a concern for interacting with youth.

23 Q. Do you know if Mario Pile was there?

24 A. I don't know.

25 Q. Did you ever discuss the incident with him?

1 curriculum. I don't remember all of us that you just  
2 mentioned meeting as a group to talk about that meeting  
3 because it wasn't that kind of meeting. It was a  
4 meeting on the curriculum and the program direction.

5 Q. With respect to expectations, did you apply a  
6 set of written expectations to each of your employees?

7 A. There is a set of written expectations that  
8 goes out that speaks to documenting your time, putting  
9 notes in iTime when you have changes, showing up for  
10 work following the schedule. All of my staff has had  
11 that e-mail sent to them.

12 Q. Is that one document?

13 A. Yes.

14 Q. Is that something that applied across the  
15 board to all of them?

16 A. To all of my staff?

17 Q. Yes.

18 A. Yes.

19 Q. Is it your understanding that supervisors are  
20 empowered to craft unique expectations for employees?

21 A. I think that supervisors have authority to  
22 have expectations for their staff as long as they are  
23 ethical and legal and they follow the Department  
24 direction and policy.

25 Q. Since the filing of the lawsuit have you kept

1 A. I discussed the incident with Gracie. I don't  
2 remember if I discussed it with anyone else, because I  
3 don't remember who was there.

4 Q. Do you recall having a June 25th, 2012  
5 mandatory staff meeting with Ms. Grimm, O&A staff, and  
6 Ms. Cloud?

7 A. Can you tell me what the meeting was about?

8 Q. Expectations generally. I'm going off my  
9 notes.

10 A. I know we had a meeting, a mandatory meeting  
11 that all staff were required to come to where we talked  
12 about the changes in O&A. I don't remember that Julie  
13 Cloud was there. She may have been. I don't remember  
14 if Betty Grimm was there.

15 But I know all the staff were there and we  
16 talked about the new curriculum, how to teach the new  
17 curriculum, what some of that was going to look like,  
18 what some of the changes were going to look like. That  
19 is the meeting I remember being mandatory.

20 Q. Did you meet with Frank Riley, Pat Thomson,  
21 Betty Grimm, or Julie Cloud prior to that meeting to  
22 plan the meeting?

23 A. I probably met with Frank to plan the meeting  
24 because I was working with him on curriculum. And I was  
25 working with a few of the staff members on the

1 any notes or logs of any kind concerning any of the  
2 Plaintiffs at all?

3 A. I have supervisory notes.

4 Q. Are those things that would be part of their  
5 employee file?

6 A. They are usually on their performance  
7 evaluations, that is where I get information, whether  
8 they are positive or negative, that is where I keep my  
9 notes, and then I put it on their performance  
10 evaluation.

11 Q. Do you keep track of who speaks to who -- or  
12 who the Plaintiffs speak to in the Department?

13 A. No.

14 Q. Have you ever followed Lisa Littlefield on her  
15 break?

16 A. Ever followed her? No.

17 Q. Have you checked to see whether she's calling  
18 in her breaks?

19 A. There was a time that I called the booth to  
20 ask if anybody had called in their breaks during that  
21 day, and no one had. And then whoever was working in  
22 the booth informed Lisa that I was checking up on her  
23 and she took that as a personal attack. And there was a  
24 direction that was given by the superintendent, I  
25 believe, or the safety and security officer, about

1 making sure that you were calling in to the booth every  
2 time you left the locked area, every time you left the  
3 secured area. So that wasn't being followed through  
4 with.

5 And then just recently I clarified that with  
6 our new superintendent because Lisa had shared with me  
7 that she was no longer doing that, and I had another  
8 staff member that still was. And for consistency I  
9 asked that the superintendent send out her expectations  
10 since there had been a change in leadership.

11 Q. But you weren't checking on Lisa specifically?

12 A. I was not checking on Lisa specifically,  
13 because there is numerous people that come and go, and  
14 if nobody is checking in and out, then we need to either  
15 change the procedure or we need to do better on our end.

16 Q. Have you ever accused Ms. Littlefield of  
17 spreading rumors about you?

18 A. I have not accused her, but I addressed her  
19 when she did spread a rumor about me because it was  
20 given to me, and she apologized for doing that.

21 Q. What was the rumor?

22 A. I believe it had to do with I took vacation  
23 time. And she had stated in the O&A booth something to  
24 the effect of I was put on leave because I was -- I was  
25 on leave for behavioral purpose rather than on vacation.

1 And when I confronted her about it, she said  
2 that I had given no notification that I was going out on  
3 leave. So I sent her a copy of the e-mail that came out  
4 that stated that I was going to be gone and why I was  
5 gone. And that was the only time that that conversation  
6 or anything like that conversation about rumors would  
7 have come up, I believe.

8 Q. Did she say that she had made a statement or  
9 did she say she was asked a question about whether you  
10 had been suspended?

11 A. She stated that she was in the booth and she  
12 had -- I don't remember if she said it was a question or  
13 a comment that Laura is out because she's on leave. I  
14 don't remember the exact term for it. I think we  
15 documented it. I think she and I had e-mails going back  
16 and forth.

17 Q. Would a question about whether you were on  
18 leave versus being suspended be a rumor or would it just  
19 be a question?

20 A. I suppose if she had the question she could  
21 have contacted me and asked me the question and I could  
22 have given her the answer, then it wouldn't have been a  
23 rumor.

24 Q. Is there a problem with her asking another  
25 employee a question?

1 A. There is not a problem with that, as long as  
2 she's getting her facts. I have no issue with that.

3 Q. Do you have any evidence that she had  
4 malicious intent or anything like that?

5 A. I don't have any evidence that it was  
6 malicious. And what I addressed her on was the fact  
7 that I felt it was disrespectful and I thought it was  
8 offensive. And I asked her to address me if she had  
9 questions.

10 Q. Any questions?

11 A. Questions pertaining to my whereabouts.

12 Q. So she's not to ask other employees, but to  
13 ask you?

14 A. If she has questions on whether I'm on leave  
15 or not for behavioral purpose, I think it would be  
16 appropriate for her to ask me.

17 Q. Was it inappropriate for her to have asked  
18 other employees?

19 A. I don't think other employees would know, so I  
20 think she'll get inaccurate information.

21 Q. Since the filing of the lawsuit have you  
22 exchanged any e-mails or other communications with Julie  
23 Cloud about any of the Plaintiffs?

24 A. I'm sure I have for personnel reasons.

25 Q. What sort of personnel reasons?

1 A. When we were doing written behavior notices  
2 for staff that had disciplinary actions.

3 Q. How about for anything pertaining to the  
4 lawsuit itself?

5 A. No, not that I can recall.

6 Q. Did you ever exchange any messages or  
7 correspondence with Betty Grimm about any of the  
8 Plaintiffs taking turns being absent?

9 A. Taking turns being absent? We did address  
10 that at some time. I don't know if it was through  
11 e-mail or not, but we addressed that the staff were gone  
12 and there seemed to be a pattern, so we spoke to the  
13 pattern.

14 Q. What was the pattern?

15 A. That they were gone on a monthly basis for  
16 several months. So it was more of a looking and  
17 wondering who was gone, why they were gone, and how many  
18 absences. I don't think it had to do necessarily with  
19 the lawsuit of Plaintiffs, because it was across the  
20 board, that all staff were being looked at for their  
21 absenteeism.

22 Q. But not the Plaintiffs in particular?

23 A. Not just the Plaintiffs in particular. It was  
24 in general. I have staff that are gone, they are gone  
25 on a monthly basis, and I need to be able to address



1 that, how do I address that. I don't think those  
 2 e-mails were to Betty Grimm. I think it was HR I was  
 3 working with.  
 4 Q. You mentioned earlier that when you were PbS  
 5 training coordinator you did not keep your AUF  
 6 certification current; is that right?  
 7 A. That's correct.  
 8 Q. When you became unit manager in O&A, did  
 9 you -- actually, when you became the unit manager  
 10 anywhere did you reinstate that?  
 11 A. Not initially.  
 12 Q. Was that something that you needed to be alone  
 13 with juveniles as unit manager?  
 14 A. I do not recall being alone with juveniles as  
 15 a unit manager.  
 16 Q. Would that have been a possibility though?  
 17 A. That would have been a possibility.  
 18 Q. How long after you became unit manager did you  
 19 reinstate your AUF certification?  
 20 A. When the new superintendent Lynn Viner put it  
 21 out as an expectation, because as a unit manager it's  
 22 not one of your required trainings.  
 23 Q. Would it be a best practice to have that?  
 24 A. If you are going to be alone supervising  
 25 youth, it would be best practice to have that, yes.

1 MR.SCHOPPE: Let's take a break for about  
 2 five minutes. I may be wrapping up here pretty quick.  
 3 (Recess taken from 2:19 to 2:36 p.m.)  
 4 Q. (BY MR. SCHOPPE) I just have some trailing  
 5 questions to ask.  
 6 When was it that the lockdown problem or the  
 7 lockdown for staff convenience became known as a problem  
 8 as far as you are concerned?  
 9 A. When I was a PbS coordinator I recognized the  
 10 trend.  
 11 Q. Do you know about how long it was before you  
 12 left that position that you noticed that, or a date  
 13 would be great?  
 14 A. How long I left what position?  
 15 Q. PbS coordinator. If you could give me a date,  
 16 that's great, but I know dates have been a little bit  
 17 tough here and there.  
 18 A. When I went from PbS to unit manager, I don't  
 19 have the date for that. Is that what you are asking?  
 20 Q. I'm sorry if I'm not being clear. So you  
 21 discovered this problem when you were PbS coordinator;  
 22 right?  
 23 A. Correct.  
 24 Q. Do you remember when that was?  
 25 A. When I started the position as a PbS

1 coordinator --  
 2 MR. COLLAER: I think that has been asked and  
 3 answered. She doesn't really remember.  
 4 THE WITNESS: You could look at my employment  
 5 records. There would be a very clear timeline there.  
 6 Q. (BY MR. SCHOPPE) Was it shortly after that or  
 7 shortly before you left or --  
 8 A. In PbS what we do is, one of the questions  
 9 that is asked of PbS is how much idle time a youth has.  
 10 And "idle time" is defined by not engaging with others,  
 11 by not engaging with staff, by being alone in a room not  
 12 doing programming.  
 13 So when the supervisor of O&A at that time was  
 14 answering that question on his PbS survey, I think he  
 15 was saying that the O&A youth had like two hours of idle  
 16 time. And when I looked at the documentation on the  
 17 logs, you could see the youth were isolated for a lot  
 18 more than just two hours during the 6:00 a.m. until  
 19 10:00 p.m. time.  
 20 So that is when I started working with the O&A  
 21 supervisor, which was Tom Knoff at the time, to try and  
 22 get a grip or understanding of what the accurate amount  
 23 of idle time was for the O&A unit.  
 24 Q. What was his response to that effort by you?  
 25 A. We talked about the youth getting up and going

1 to bed at different times, and so I think he altered  
 2 when youth went to bed at night. I think he made it so  
 3 they went to bed later, because he had youth that were  
 4 being isolated starting at 5:30 p.m., and so that was  
 5 their bedtime.  
 6 And so what was happening is the O&A staff  
 7 were taking youth to dinner. They were coming back from  
 8 dinner prior to 5:00. The O&A staff were locking all of  
 9 the youth down for 30 to 45 minutes, and then those kids  
 10 that went to bed at 5:30 were never allowed back out for  
 11 the night.  
 12 So there was no way these kids were only being  
 13 isolated for two hours a day. So he started working  
 14 with his staff to try and lessen the time that youth  
 15 were isolated after dinner. And I believe he worked  
 16 with staff as part of his facility improvement plan  
 17 through PbS to not have any youth locked down for more  
 18 than 15 minutes after any of the meal times.  
 19 Q. Did he ever prepare a report or a study or  
 20 anything like that on lockdown, comparative lockdown  
 21 times?  
 22 A. Not that I saw. There is guard tour reports  
 23 that are created if you are using the guard tour system  
 24 that can show how often or how long youth are locked  
 25 down.



1 Q. Did you and he have disagreements as to how to  
 2 address any of these issues that had come up in the PbS  
 3 numbers?  
 4 A. No. When we would talk, we had meetings, I  
 5 believe, every three months, every two months. They  
 6 were PbS meetings where all the supervisors would get  
 7 together and we would talk about how we were working or  
 8 our facility improvement plans, then we would talk  
 9 strategies.  
 10 Q. Is the lockdown policy at other JCCs, like  
 11 Lewiston and St. Anthony, the same as it was when  
 12 Mr. Knoff was in charge here at Nampa?  
 13 A. I don't know.  
 14 Q. Do you know what their policies are?  
 15 A. St. Anthony doesn't utilize youth lockdowns  
 16 because they have live-in dorms, so theirs is very, very  
 17 different. I don't know what Lewiston's expectations  
 18 are for lockdown.  
 19 Q. Have you ever discussed it with anybody in  
 20 Lewiston?  
 21 A. We've had conversations -- when I was PbS  
 22 coordinator we had conversations and we talked strategy,  
 23 about how to keep youth out of their room. And I spent  
 24 most of my time talking to St. Anthony staff because  
 25 they had an observation and assessment unit and Lewiston

1 does not.  
 2 Q. Do you know what units they have there?  
 3 A. At St. Anthony?  
 4 Q. No, at Lewiston.  
 5 A. They have one program; it's a 36-bed program.  
 6 Q. This lockdown policy, should it matter between  
 7 any of the programs or units, should it be different for  
 8 O&A than it should be for Solutions or Choices?  
 9 A. I think that behavior management as it  
 10 pertains to lockdown should be consistent.  
 11 Q. Throughout the facility even?  
 12 A. Hopefully throughout the Department. If we  
 13 all have one philosophy, that would be, I think, the  
 14 healthiest practice.  
 15 Q. If Lewiston isn't doing it the way that you  
 16 had been following it, with the PbS best practices, are  
 17 they doing it wrong?  
 18 A. I think that would be up to their  
 19 superintendent to make that determination.  
 20 Q. Do you know who that is?  
 21 A. Their superintendent?  
 22 Q. Right.  
 23 A. Kevin Bernatz.  
 24 Q. Do you know who makes decisions about lockdown  
 25 policy?

1 A. There is currently a group that is working on  
 2 the policy for behavior management, and I don't know who  
 3 is on that team.  
 4 Q. I understand they don't have an O&A department  
 5 there. Do you have a counterpart, as far as you know,  
 6 there?  
 7 A. There are unit managers up there. The unit  
 8 manager that is in Lewiston is Terry Lewis.  
 9 Q. How about lockdown with respect to county  
 10 detention centers, are you familiar with how they do it?  
 11 A. I'm not very familiar. I spent a little time  
 12 talking with the McCall detention, and I've spent a  
 13 little time talking with the Canyon County detention.  
 14 And they have their own programs, and they implement  
 15 their own programmatic direction.  
 16 Q. Do you know what standards they refer to in  
 17 doing that?  
 18 A. I have not had that conversation with them.  
 19 Q. Is there only one set of standards to go by as  
 20 far as you are concerned?  
 21 A. I'm sure there are lots of sets of standard.  
 22 And there are probably different standards between  
 23 detentions and corrections, because detention they are  
 24 housing youth with less programmatic time. And the  
 25 corrections has more programmatic time; most of our

1 youth stay with us for about a year.  
 2 Q. Is there a reason the standards that you've  
 3 selected to go by are superior to others in your  
 4 judgment?  
 5 A. The standards that I have selected to go by  
 6 came from working with PbS to try and understand best  
 7 practices.  
 8 Q. Are there any other organizations like PbS?  
 9 A. I'm sure there are.  
 10 Q. Do you know of any specifics?  
 11 A. None that I've worked with.  
 12 Q. In April 2012 did you receive an e-mail from  
 13 Alanna Kimmel indicating that Julie McCormick was  
 14 interacting inappropriately with [REDACTED]?  
 15 A. I believe I received an e-mail from Alanna, I  
 16 don't know the date, and it spoke to her concerns that  
 17 Julie McCormick was spending time on the Solutions unit  
 18 and for no apparent reason.  
 19 Q. What did you do with that information, if  
 20 anything?  
 21 A. I sent it on to the superintendent and worked  
 22 with her and talked with her about the scenario and the  
 23 concerns.  
 24 Q. What did you talk about with her?  
 25 A. I shared with her that Alanna had concerns

1 that Julie McCormick was spending time in the Solutions  
2 unit for no apparent reason. And I believe that  
3 Superintendent Grimm had a lot of meetings with HR and  
4 talk about her concerns, but I wasn't part of that  
5 conversation.

6 Q. Did Alanna explain what her particular  
7 concerns were?

8 A. I'm sure she did to HR, but she met with HR on  
9 the situation because it was a personnel concern that  
10 she had with someone.

11 Q. Did she say that; she didn't express what her  
12 concerns were to you apart from just the time on the  
13 unit?

14 A. What I recall was that she was concerned that  
15 Julie was spending too much time on the unit. She  
16 didn't understand why, she didn't see the purpose.

17 Q. Did she express any concern to you about her  
18 spending an inordinate amount of time with [REDACTED] in  
19 particular?

20 A. I don't remember. I would have to look at the  
21 e-mail.

22 Q. Is that something you passed on to  
23 Superintendent Grimm?

24 A. I did.

25 Q. Did you send the e-mail itself on?

1 A. I would have to look at my history. I just  
2 know that I passed the information on. I would assume I  
3 sent the e-mail because that would be the best way to  
4 send it.

5 Q. Did you interact with Ms. McCormick in any way  
6 to resolve the issue?

7 A. I did not interact with Julie McCormick. I  
8 wasn't her supervisor. The only time -- I didn't  
9 interact with, no, not at that level.

10 Q. Are you familiar with an assault scenario  
11 involving SB ?

12 A. Do you have any more information?

13 Q. I really don't. It's just from my notes.

14 A. No.

15 Q. How about a DL ?

16 A. There was a youth DL that was in  
17 Solutions. I guess she came through O&A too. I don't  
18 know how many assaults she had, but she had numerous  
19 restraints for different behavioral reasons.

20 Q. Is that out of your purview?

21 A. She was in Solutions when I was down there and  
22 she had many behavioral problems.

23 Q. Did she assault anybody in particular that you  
24 recall?

25 A. I don't know who she assaulted. I would

1 assume she assaulted more than one person because that  
2 was the nature of who she was.

3 Q. What steps were taken when she was committed  
4 for those assaults?

5 A. When a youth in Solutions has behavior  
6 concerns, a safety plan is put in place. They work with  
7 the group leader. They do a chain analysis, which is  
8 part of the dialectic behavior therapy model, and they  
9 work to make amends. The youth are usually isolated  
10 until they have a willingness to reengage with the  
11 group.

12 Q. How long does that time frame last?

13 A. It's up to how long it takes the youth to have  
14 a willingness to reengage. It could be short; it could  
15 be long. It's entirely up to the youth.

16 Q. Is it up to the supervisor or the staff as  
17 well?

18 A. The staff has to have a level of comfort that  
19 the youth is going to engage appropriately. If the  
20 youth is yelling and screaming and calling your name  
21 saying they are ready, their behavior is not showing  
22 that they are ready.

23 Q. Can they be confined for up to 72 hours?

24 A. I think they probably could if they continued  
25 to be aggressive and violent and not have a willingness

1 to do what is being asked of them.

2 Q. Is there any problem confining them under  
3 those circumstances?

4 A. No.

5 Q. Is there any problem with it being up to the  
6 staff or their supervisors as to how long to keep the  
7 youth locked in?

8 A. They have to do a due process every 24 hours.  
9 And during that due process the youth is explained what  
10 the expectations are, what they need to do to reengage.  
11 And then the youth has to have the willingness. If the  
12 youth continues not to have a willingness, then there is  
13 very little staff can do to force somebody else to have  
14 a willingness to do what is being asked of them.

15 Q. Is that consistent with PbS best practices as  
16 you understand them?

17 A. I believe so, yes.

18 Q. That is not the solution you apply in O&A, is  
19 it?

20 A. Yes, it is.

21 Q. It is?

22 A. Yes. If a youth is given a reentry contract  
23 and they refuse to do it and they are continuing to be  
24 violent and aggressive and assaultive and they are  
25 continuing to yell at staff and not engage in the work

1 that is being done to them, then they stay in their room  
2 until they have the willingness to do what is expected  
3 of them.

4 Q. That is up to staff or supervisors?

5 A. It's up to the youth to have the willingness  
6 to work with the staff. They are given a very clear  
7 criteria to be able to follow.

8 Q. But if staff don't believe them that they are  
9 ready, can staff elect to keep them confined?

10 MR. COLLAER: Object to the form of the  
11 question; it's vague, calls for speculation.

12 THE WITNESS: They do a due process, like I've  
13 explained, every 24 hours that shows the youth what they  
14 are expected to do and gives the youth the expectations  
15 to follow.

16 Q. (BY MR. SCHOPPE) Did you ever tell Jay  
17 Rosentrader that you could get him fired?

18 A. I don't believe so.

19 Q. Or did you ever tell him you had gotten other  
20 people fired?

21 A. No.

22 MR. SCHOPPE: Those are all my questions.

23 MR. COLLAER: No questions.

24 (Deposition concluded at 2:50 p.m.)

25 (Signature requested.)

1 CERTIFICATE OF WITNESS

2 I, LAURA ROTERS, 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 180; 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 LAURA ROTERS

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

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

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