

# Idaho Department of Juvenile Corrections

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

Telecommunications Relay Service (TRS) 1 800 377-3529

C.L. "BUTCH" OTTER  
Governor

SHARON HARRIGFELD  
Director

August 13, 2012

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

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

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

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

Dear Director Reinke, Colonel Russell and Mr. Panther:

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

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

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

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

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

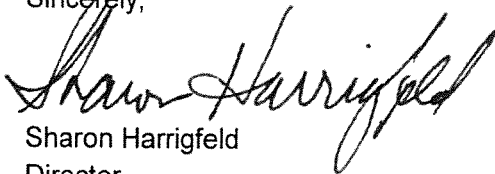
ISP will conduct an independent investigation of those allegations in the 1<sup>st</sup> Amended Complaint which appear to involve activity which is criminal in nature. If ISP discovers evidence of criminal activity, ISP will report the results of its investigation directly to the appropriate county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

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

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

Thank you for your assistance.

Sincerely,



Sharon Harrigfeld  
Director

cc: David Hensley  
Office of the Governor