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

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

RHONDA LEDFORD, an individual;  
RAYMON GREGSTON, an individual; JO  
MCKINNEY, an individual; SHANE PENROD,  
an individual; KIM MCCORMICK, an  
individual; BOB ROBINSON, an individual;  
and GRACIE REYNA, an individual; LISA  
LITTLEFIELD, an individual; ADDISON  
FORDHAM, an individual; TOM DE KNIJF, an  
individual; and FRANK FARNWORTH, an  
individual,

Plaintiffs,

vs.

IDAHO DEPARTMENT OF JUVENILE  
CORRECTIONS, an executive department of  
the State of Idaho; IDJC DIRECTOR SHARON  
HARRIGFELD, in her individual and official  
capacities; IDJC JUVENILE CORRECTIONS  
CENTER – NAMPA SUPERINTENDENT  
BETTY GRIMM, in her individual and official  
capacities; and DOES 1-20,

Defendants.

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

**AFFIDAVIT OF SABRINA PAYNE  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**AFFIDAVIT OF SABRINA PAYNE IN SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT - 1**







was never contacted by the plaintiffs concerning my accident. I was very upset they had included my accident in their complaint without first speaking with me.

7. I understand the plaintiffs' contend the Nampa facility is unsafe because of the manner in which juvenile offenders are managed. I have never felt unsafe working at the facility, even after my own accident described above. I further understand that plaintiffs suggest that staff, such as myself, are discouraged from filing criminal charges against juvenile offenders who commit assaults upon staff. I have never been told or discouraged in any fashion from pursuing criminal charges if I felt such action was appropriate. I did not pursue criminal charges in connection with my own injuries because, as outlined above, it is my belief my injuries were caused by an accident rather than an intentional assault.

8. As described in ¶2, above, the incident where I was injured involved a physical restraint being performed upon a juvenile who, was attempting to leave a classroom. Since that time, IDJC policy governing restraints has changed. Presently, if a juvenile becomes disruptive or chooses to leave a classroom or a group, they are not subjected to a physical restraint. Instead, the juvenile is allowed to leave the room and, is followed by a staff member who immediately begins interacting with the juvenile in an attempt to deescalate the situation and, avoid the need for a physical altercation through a restraint. If this policy had been in place and had been followed at the time of my accident, the restraint which led to my injury would not have taken place in the narrow hallway where I was accidentally kicked. It is very possible the restraint would not have happened at all.

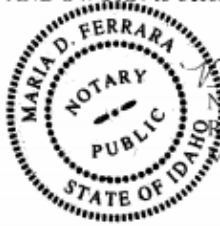
FURTHER your Affiant saith naught.

  
Sabrina Payne

AFFIDAVIT OF SABRINA PAYNE IN SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT - 3



SUBSCRIBED AND SWORN to before me this 21 day of November, 2013



*Maria D. Ferrara*  
Notary Public for Idaho  
Residing at *Canyon County*  
My Commission Expires: *03/07/2017*

AFFIDAVIT OF SABRINA PAYNE IN SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT - 4

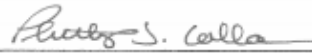




CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 25 day of November, 2013, I served a true and correct copy of the foregoing **AFFIDAVIT OF SABRINA PAYNE** by delivering the same to each of the following attorneys of record, by the method indicated below, addressed as follows:

Andrew T. Schoppe	<input type="checkbox"/>	U.S. Mail, postage prepaid
LAW OFFICE OF ANDREW T.	<input type="checkbox"/>	Hand-Delivered
SCHOPPE	<input type="checkbox"/>	Overnight Mail
910 W. Main Street, Ste 358	<input type="checkbox"/>	Facsimile
Boise, ID 83702	<input checked="" type="checkbox"/>	ECF
Telephone: (208) 450-3797		
Fax: (208) 392-1607		



Phillip J. Collaer

**AFFIDAVIT OF SABRINA PAYNE IN SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT - 5**