

Phillip J. Collaer – ISB No. #3447  
ANDERSON, JULIAN & HULL LLP  
C. W. Moore Plaza  
250 South Fifth Street, Suite 700  
Post Office Box 7426  
Boise, Idaho 83707-7426  
Telephone: (208) 344-5800  
Facsimile: (208) 344-5510  
E-Mail: [pcollaer@ajhlaw.com](mailto:pcollaer@ajhlaw.com)

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

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 MICHAEL SAVOIE  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**AFFIDAVIT OF MICHAEL SAVOIE IN SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT - 1**







5. During the time I was an employee of the Division of Human Resources, I have never spoken with Betty Grimm. For that reason, I did not, in any fashion, advise Ms. Grimm that Ms. Ledford had contacted me or that we had discussed the matters identified in ¶3, above. Additionally, I have no recollection that I ever advised Ms. Grimm, Ms. Harrigfeld or anyone employed at the Department of Juvenile Corrections that Ms. Ledford had told me that she had been in contact with the governor's office.

6. In November of 2011, a document was delivered to DHR that appeared to be a petition addressing the hiring of certain supervisors at IDJC. The document was anonymous as it contained no signatures. I do not know who delivered or sent the document to DHR.

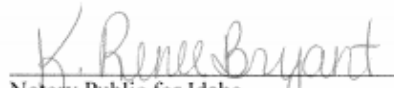
7. After receiving the petition, I reviewed it with my supervisors and, Vicki Tokita. I do not believe I forwarded a copy to IDJC, and I am not aware of any further actions taken by DHR in the matter of this petition

FURTHER your Affiant saith naught.

  
Michael Savoie

SUBSCRIBED AND SWORN to before me this 22nd day of November, 2013



  
Notary Public for Idaho  
Residing at Bowen, ID

My Commission Expires: 3/23/2017

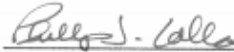
AFFIDAVIT OF MICHAEL SAVOIE IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT - 3



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 MICHAEL SAVOIE** 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 MICHAEL SAVOIE IN SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT - 4**