

DIGITALLY RECORDED

SWORN STATEMENT

OF

[REDACTED]

OIG CASE #:

2019-010614

DEPARTMENT OF JUSTICE

OFFICE OF THE INSPECTOR GENERAL

JUNE 14, 2021

RESOLUTE DOCUMENTATION SERVICES
28632 Roadside Drive, Suite 285
Agoura Hills, CA 91301
Phone: [REDACTED]

APPEARANCES :

OFFICE OF THE INSPECTOR GENERAL

BY: [REDACTED]

BY: [REDACTED]

WITNESS :

[REDACTED]

OTHER APPEARANCES :

NONE

1 MR. [REDACTED]: The recorder is on and
2 it's currently June 14, 2021 at approximately
3 9:37 a.m.

4 MR. [REDACTED]: My name is [REDACTED].
5 I'm a Special Agent with the U.S. Department of
6 Justice Office of the Inspector General New
7 York Field Office. And these are my
8 credentials. I'll show it to you again.

9 MS. [REDACTED]: Thank you.

10 MR. [REDACTED]: This interview with Federal
11 Bureau of Prisons Correctional Officer
12 Lieutenant [REDACTED]. Did I get
13 that right?

14 MS. [REDACTED]: That's correct.

15 MR. [REDACTED]: And she is being interviewed
16 as part of an official U.S. Department of
17 Justice Office of the Inspector General
18 investigation. Today is June 14th and the time
19 is approximately 9:35 a.m. The interview is
20 being conducted on the third-floor telephone
21 monitor room of the Metropolitan Correction
22 Center. Also present is DOJ OIG Senior Special
23 Agent [REDACTED]. Can you pronounce your last name
24 please?

25 MR. [REDACTED]: [REDACTED]. And

1 these are my credentials.

2 MS. [REDACTED]: Thank you.

3 MR. [REDACTED]: And Lieutenant [REDACTED]
4 [REDACTED]. This interview will be
5 recorded by me, Special Agent [REDACTED].

6 Can everyone please identify themselves for the
7 record and spell your last name. To start
8 again, I am DOJ OIG Special Agent [REDACTED]
9 [REDACTED], [REDACTED].

10 MR. [REDACTED]: Senior Special Agent
11 [REDACTED], [REDACTED].

12 MS. [REDACTED]: Lieutenant [REDACTED]
13 [REDACTED], [REDACTED]-
14 [REDACTED]

15 MR. [REDACTED]: This is an official DOJ OIG
16 investigation into the death of inmate Jeffrey
17 Epstein and everything that surrounds that time
18 period. And you're being asked to voluntarily
19 provide some answers to our questions. Will
20 you agree to a voluntary interview with the DOJ
21 OIG?

22 MS. [REDACTED]: Yes.

23 MR. [REDACTED]: I'm going to provide you with
24 a form, DOJ OIG Form 3-226-2. The title of the
25 form is Warnings and Assurances to Employee

1 Requested to Provide Information on a Voluntary
2 Basis. I'm going to read it out to you first.
3 And then I'll let you review it also. You are
4 being asked to provide information as part of
5 an investigation being conducted by the Office
6 of the Inspector General. This investigation
7 is being conducted pursuant to the Inspector
8 General Act of 1978 as amended. This
9 investigation pertains to job performance
10 failure and security failure. This is a
11 voluntary interview. Accordingly, you do not
12 have to answer any questions. No disciplinary
13 action will be taken against you if you choose
14 not to answer any questions. Any statement you
15 furnish may be used as evidence in any future
16 criminal proceedings, or agency disciplinary
17 proceedings, and/or both. Now this is the
18 waiver part. This is for you. I understand
19 the Warnings and Assurances stated above and I
20 am willing to make a statement and answer
21 questions. No promises or threats have been
22 made to me and no pressure or coercion of any
23 kind has been used against me. Do you
24 understand?

25 MS. [REDACTED]: I understand.

1 MR. [REDACTED]: Do you want to move forward
2 with the interview?

3 MS. [REDACTED]: Yes.

4 MR. [REDACTED]: Please sign your name and
5 print your name.

6 MR. [REDACTED]: Let's just say thank you
7 for signing and (Indiscernible *00:03:37).

8 MR. [REDACTED]: Thank you for signing the
9 form. I myself am signing the form. I'm going
10 to print my name on it. And Agent [REDACTED] is
11 also going to do it.

12 MR. [REDACTED]: Thank you SA [REDACTED] for
13 signing and dating 6/14/2021 at 9:38 a.m. This
14 is SSA [REDACTED] and I am now signing as the
15 witness and printing my name as a witness.

16 MR. [REDACTED]: Again, thank you, [REDACTED].
17 Before starting the interview, I would like to
18 place you under oath. Lieutenant [REDACTED], can
19 you please raise your right hand? Do you swear
20 to tell the truth and nothing but the truth
21 during this interview?

22 MS. [REDACTED]: I do to the best of
23 my knowledge and belief.

24 MR. [REDACTED]: Thank you. Please let me
25 know if you do not understand any questions and

1 I will repeat it or try to rephrase it. I ask
2 that you do not try to guess answers. If you
3 don't know, just say you don't know.

4 MS. [REDACTED]: Okay.

5 MR. [REDACTED]: Thank you. So we'll go
6 through a little bit of your background before
7 we get in. What is your current home address?

8 MS. [REDACTED]: [REDACTED]

9 [REDACTED]

10 [REDACTED].

11 MR. [REDACTED]: Thank you. What is your date
12 of birth?

13 MS. [REDACTED]: [REDACTED].

14 MR. [REDACTED]: And your Social Security
15 Number.

16 MS. [REDACTED]: [REDACTED].

17 MR. [REDACTED]: What is your current cell
18 phone number?

19 MS. [REDACTED]: [REDACTED].

20 MR. [REDACTED]: What is your highest level of
21 education?

22 MS. [REDACTED]: I have some college.

23 MR. [REDACTED]: What did you do prior to
24 working for the bop?

25 MS. [REDACTED]: I was in the

1 military.

2 MR. [REDACTED]: Thank you for your service.

3 What branch?

4 MS. [REDACTED]: The Navy.

5 MR. [REDACTED]: How many years?

6 MS. [REDACTED]: Eight.

7 MR. [REDACTED]: Alright. And how long have
8 you served with the Federal Bureau of Prisons?

9 MS. [REDACTED]: Twenty-six years.

10 MR. [REDACTED]: Do you remember when you
11 started? What year you started?

12 MS. [REDACTED]: [REDACTED].

13 MR. [REDACTED]: When did you graduate from
14 bop training? It was soon after?

15 MS. [REDACTED]: No. I went to
16 Glynco. I know it was probably six months to a
17 year after I started.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: I don't remember the
20 exact date. But it was in '95.

21 MR. [REDACTED]: '95?

22 MS. [REDACTED]: Yeah, it was in 1995.
23 I don't remember the month.

24 MR. [REDACTED]: That's fine. When and where
25 was your first office assignment with the BOP?

1 MS. [REDACTED]: FCI Terminal Island.

2 MR. [REDACTED]: And after that, how long were
3 you at Terminal Island for?

4 MS. [REDACTED]: For probably around
5 six to seven months. I resigned and took a
6 position in San Diego.

7 MR. [REDACTED]: You resigned the position
8 altogether? Or did you get a transfer?

9 MS. [REDACTED]: The way that they did
10 it was they had me resign and then they picked
11 me up in San Diego.

12 MR. [REDACTED]: Okay. So -.

13 MS. [REDACTED]: It's the way that
14 they had me do it.

15 MR. [REDACTED]: Was there a break in
16 service?

17 MS. [REDACTED]: No. There was no
18 break in service. No.

19 MR. [REDACTED]: At Terminal Island, what was
20 your position?

21 MS. [REDACTED]: I was a correctional
22 officer.

23 MR. [REDACTED]: Okay. And then six months
24 after you went over to San Diego.

25 MS. [REDACTED]: As a correctional

1 officer.

2 MR. [REDACTED]: Okay. How long were you
3 there for?

4 MS. [REDACTED]: A little over ten
5 years.

6 MR. [REDACTED]: Ten years.

7 MS. [REDACTED]: Yes.

8 MR. [REDACTED]: San Diego. Okay. And what
9 other positions have you held with the BOP?

10 MS. [REDACTED]: Correctional
11 Counselor and currently as a lieutenant.

12 MR. [REDACTED]: When did you get promoted as
13 a counselor?

14 MS. [REDACTED]: In I believe it was -
15 . I started in I believe it was July of 2005.

16 MR. [REDACTED]: July 2005.

17 MS. [REDACTED]: Mm-hmm.

18 MR. [REDACTED]: Alright. And then after
19 counselor, you got promoted as -.

20 MS. [REDACTED]: A lieutenant.

21 MR. [REDACTED]: Lieutenant. And when was
22 that?

23 MS. [REDACTED]: That was in 2010. I
24 believe it was December 2010 that I
25 transferred.

1 MR. [REDACTED]: Where did you transfer?
2 MS. [REDACTED]: FCI Jessup.
3 MR. [REDACTED]: Jessant?
4 MS. [REDACTED]: Jessup.
5 MR. [REDACTED]: Jessup.
6 MS. [REDACTED]: Jessup. In Georgia.
7 MR. [REDACTED]: Georgia. Okay. In 2010 you
8 transferred and that was a promotion to
9 lieutenant?
10 MS. [REDACTED]: Yeah. Well as a
11 counselor I was already a 9. So I just I guess
12 lateral over in a sense to a GS9 lieutenant.
13 MR. [REDACTED]: Okay. In Jessup. Okay.
14 MS. [REDACTED]: Right.
15 MR. [REDACTED]: And how long were you in
16 Jessup for?
17 MS. [REDACTED]: Up until I came here
18 in November of 2014.
19 MR. [REDACTED]: November 2014. Have you been
20 here ever since or did you have any transfers?
21 MS. [REDACTED]: Not without trying to
22 leave. But yes, I've been here since 2014.
23 Yes.
24 MR. [REDACTED]: And were you transferred over
25 as a lieutenant?

1 MS. [REDACTED]: I was a lieutenant
2 when I was at Jessup. I went there as a 9. I
3 got my 11 and I just lateraled over here as an
4 11.

5 MR. [REDACTED]: And have you been in that
6 position ever since?

7 MS. [REDACTED]: That depends on what
8 you mean by ever since. Have I been working in
9 the position or have I held that position?
10 I've held that position. I'm currently still a
11 lieutenant.

12 MR. [REDACTED]: Okay. And - bear with me.
13 On August 9th and 10th of 2019, what was your
14 position at the MCC?

15 MS. [REDACTED]: I was a lieutenant.

16 MR. [REDACTED]: Okay. And what shift did you
17 work on August 9th and 10th?

18 MS. [REDACTED]: I believe it was the
19 morning watch shift.

20 MR. [REDACTED]: What time does the morning
21 watch shift start?

22 MS. [REDACTED]: At that time, we were
23 coming in I believe it was from 10:00 to 6:00.
24 I think that's it. We would relieve them
25 around 10:00 and then we got off - we got

1 relieved at around 6:00.

2 MR. [REDACTED]: So you would come in at 10:00
3 a.m. and -?

4 MS. [REDACTED]: 10:00 p.m.

5 MR. [REDACTED]: 10:00 p.m. And leave at 6:00
6 a.m.?

7 MS. [REDACTED]: Well it depends on
8 what time our relief came. But those were the
9 hours that we were working around. Around that
10 time.

11 MR. [REDACTED]: Officially that's the
12 schedule?

13 MS. [REDACTED]: Officially, our hours
14 were midnight to 8:00. But we would come in
15 and relieve around, you know, between the hours
16 of 10:00 and 6:00. I'll put it like that.

17 MR. [REDACTED]: Understood. Okay. And who
18 was your supervisor when you worked at the MCC
19 on August 9th and 10th? Who did you report to?

20 MS. [REDACTED]: Then I think it was
21 Captain [REDACTED]. Yeah. I think it was Captain
22 [REDACTED]. We've had so many captains in and out
23 since I've been here, it's hard to keep track
24 sometimes. But yeah, it's Captain [REDACTED].

25 MR. [REDACTED]: As a lieutenant, where were

1 you assigned during August 9th and 10th where
2 were you assigned?

3 MS. [REDACTED]: I was operations
4 lieutenant.

5 MR. [REDACTED]: Okay. And as an operations
6 lieutenant, what are your daily duties?

7 MS. [REDACTED]: We supervise staff
8 and of course the inmate population. We're
9 responsible for the safety and security of the
10 inmate staff and the institution. We do - we
11 hire overtime. We make runs throughout the
12 institution. And do various other duties. We
13 have checks and balances that we have to do
14 throughout the night.

15 MR. [REDACTED]: Okay. As a supervisor, who
16 did you supervise?

17 MS. [REDACTED]: I supervised the
18 inmate population and of course the staff that
19 worked for me during that shift.

20 MR. [REDACTED]: Do you remember who you r
21 staff was during that shift?

22 MS. [REDACTED]: Ooh, all of them?
23 No. No I do not.

24 MR. [REDACTED]: Any key people you
25 communicated with?

1 MS. [REDACTED]: I mean I communicate
2 with all my staff.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: There is not one
5 person during the course of a shift that I
6 don't communicate with. Especially when I'm
7 making rounds. And especially during that
8 time, I communicated with them even more
9 because we were below the bottom of the barrel
10 then when it came to staffing. So we really
11 didn't have a lot of -. We didn't have anybody
12 back then. We didn't even have enough staff at
13 that time to even respond to body alarms. Or
14 to do uses or forces. You know. Especially on
15 morning watch. It's already tight. But we was
16 even tighter. So that was one of those nights
17 when as much as -. Well that night as like
18 every other night. As much as possible I tried
19 to talk to staff because staff were doing back-
20 to-back mandations then. And you had staff
21 that were being mandated every day of the week
22 Monday through Sunday. Or Sunday through
23 Saturday as we say in Bureau. Because that's
24 when our week officially starts - Sunday.

25 MR. [REDACTED]: When you say mandated what do

1 you mean by that?

2 MS. [REDACTED]: Mandations are
3 mandatory overtime. That's when you've
4 exhausted your overtime roster. That's the
5 people that sign up for overtime. You've gone
6 through that. There's no one available. Or
7 you get everybody from that list that wants to
8 do overtime or that's available. Then you
9 announce it over the intercom system. That's
10 voluntary. Whoever wants overtime outside of
11 that, you can assign them overtime from there.
12 And then we go to mandatory overtime. That's
13 when we have nothing else left. And we have to
14 utilize the staff that we have currently on
15 duty that's not officially on a double-shift.
16 That's not officially on 16 hours.

17 MR. [REDACTED]: So I'm going to ask a couple
18 more questions. How many hours where COs
19 working during that time period? ON average?

20 MS. [REDACTED]: Sixteen plus because
21 -.

22 MR. [REDACTED]: Per day?

23 MS. [REDACTED]: Per day. Yes.
24 Because there were days when staff would be
25 late. There were days when there wasn't

1 anybody even after we mandated everybody on the
2 shift. We didn't have anybody to fill a bunch
3 of posts. We had vacated posts. We had a lot
4 of stuff. It was grueling during that time.
5 And I think we had been doing that for at least
6 a year if not more than a year.

7 MR. [REDACTED]: Okay.

8 MS. [REDACTED]: Mm-hmm.

9 MR. [REDACTED]: Did you previously meet with
10 agents regarding the Epstein investigation?

11 MS. [REDACTED]: I did.

12 MR. [REDACTED]: Do you recall meeting with
13 them on August 14, 2019 in regard to the
14 matter?

15 MS. [REDACTED]: I don't remember what
16 day it was. But yes, I recall meeting with
17 them.

18 MR. [REDACTED]: I have a summary of the
19 report. What I'm going to do is I'm going to
20 read it out to you. And once I read it out to
21 you, we're going to have some follow-up
22 questions because there's some holes in there
23 that we would like to fill. This is like the
24 summary part. [REDACTED] informed that she
25 had been employed with the Bureau of Prisons

1 since [REDACTED] and promoted to
2 lieutenant around 2010 and has spent her entire
3 career working at the Metropolitan Correctional
4 Facility. During the interview, [REDACTED]
5 described the duties -.

6 MR. [REDACTED]: Let her correct that.
7 It's not correct. So if you hear something
8 that's not correct --

9 MR. [REDACTED]: Yes, please.

10 MR. [REDACTED]: -- just say that that's
11 not correct.

12 MS. [REDACTED]: Okay.

13 MR. [REDACTED]: If you hear anything, please
14 interrupt me and I'll -.

15 MS. [REDACTED]: Okay. I was a
16 lieutenant prior to coming here. I had - as a
17 matter of fact, I was promoted. I was given a
18 temporary position not to exceed a year as a
19 lieutenant back in I think it was 2000, 2001
20 when I was at MCC San Diego in California. And
21 I did - even after that year expired, I
22 remained in the lieutenant's office for the
23 next three or four years after that until I
24 transferred. And so when I came here, when I
25 left there, I went to be a counselor. And then

1 I picked up my lieutenant position again in
2 Jessup. When I came here, I was already a
3 lieutenant. I didn't get promoted to the
4 lieutenant rank coming here.

5 MR. [REDACTED]: Okay.

6 MS. [REDACTED]: And I haven't spent
7 my whole career here at MCC New York. This is
8 my fifth institution.

9 MR. [REDACTED]: Okay.

10 MR. [REDACTED]: You said you've been here
11 since 2014.

12 MS. [REDACTED]: I've been here since
13 November of 2014.

14 MR. [REDACTED]: Okay. I'm going to keep
15 going. If you hear anything wrong, please -.

16 MS. [REDACTED]: Okay.

17 MR. [REDACTED]: During the interview,
18 [REDACTED] described the duties and
19 responsibilities of the position as well as the
20 guards she supervises at the MCC. [REDACTED]-

21 [REDACTED] is assigned to the midnight shift to 8:00
22 a.m. shift, but routinely arrives at 10:00 a.m.

23 MS. [REDACTED]: 10:00 p.m.

24 MR. [REDACTED]: 10:00 p.m. Sorry, I read
25 that wrong. In addition to describing her

1 administrative duties, [REDACTED] described
2 how a count at the MCC works and that the
3 lieutenants are responsible for supervising one
4 count per shift. [REDACTED] described that
5 during the count, two guards assigned to the
6 area are to unlock the main gate that separates
7 the cells from the open and common area where
8 the guards are. One guard will walk down range
9 and actually look into each cell and count the
10 number of prisoners inside. Once the count is
11 complete, the guard will return to the gate and
12 exchange places with the guard that was left to
13 secure the gate. That guard will then walk
14 down range and count the number of prisoners in
15 the cells. Upon completion, the guard will
16 return to the gate, secure it from the outside,
17 and record the numbers that came from their
18 count. Those numbers will be compared to the
19 master list of prisoners on record for being
20 assigned to the cells. In addition to the
21 numbers being recorded and compared to the
22 master list or the E-1 sheet, the guards will
23 call in or receive a call from internal and
24 give a verbal record of their count. And
25 internal.

1 MS. [REDACTED]: Wait a minute. What
2 is that again?

3 MR. [REDACTED]: I'll repeat that back. In
4 addition to the numbers being recorded and
5 compared to the master list or E-1 sheet, the
6 guards will call in or receive a call from
7 internal.

8 MS. [REDACTED]: That's not true.

9 MR. [REDACTED]: Go ahead. You can tell me.

10 MS. [REDACTED]: When the officers
11 take the count, once they have gone around to
12 each range and both of them had counted each
13 range, before they leave that range, they will
14 compare their count for that particular range.
15 And they would do that in each subsequent
16 range. When they've completed, they call the
17 control center. And they will call in their
18 unit. They will call in the count that they
19 got for that particular unit. They will give
20 them their name, who conducted the count, and
21 at that time, the control center will let them
22 know whether they have a good count or a bad
23 count. Internals position is to pick up those
24 count slips after each unit has counted and
25 place those counts slips out into their

1 respective sally port to be picked up by
2 internal. They do not call. Internal has
3 absolutely nothing to do with their count
4 unless they get a bad count. Sometimes
5 internal, or if we have other extra staff, they
6 will go up there and they will assist them with
7 the count. You know just to see maybe if one
8 of them miscounted or something like that.
9 They would just be like an additional person.
10 A new set of eyes, basically, to assist them
11 with the count.

12 MR. [REDACTED]: So before I continue, I had a
13 question for you. Can you say the difference
14 between internal and control? What exactly
15 their duties are?

16 MS. [REDACTED]: The internal officer
17 is an officer who mans the elevator. He's
18 responsible for moving inmates around in the
19 institution. He has - they have checks and
20 stuff that they do throughout their shift. But
21 mainly they're responsible for moving inmates
22 up throughout the institution. They respond to
23 body alarms. They pick up the count slips.
24 And they just have general duties throughout
25 the night. They assist with the count

1 throughout the night. But yes, once those
2 officers if they was to get a bad count, they
3 count again. And then if they get another bad
4 count, a subsequent bad count, then internal or
5 whoever else we have available at the time
6 that's not assigned to doing something else
7 will go in and conduct another count. But
8 internal would never just - they never report
9 to internal the results of their count.

10 MR. [REDACTED]: I was just going to ask.
11 On this if she's able to identify during her
12 shift who was in internal.

13 MR. [REDACTED]: Do you remember who was in
14 internal that night?

15 MS. [REDACTED]: That night? No.

16 MR. [REDACTED]: What about control?

17 MS. [REDACTED]: No. I don't. And I
18 don't want to guess.

19 MR. [REDACTED]: And that's why I gave him
20 -. This is the official duty roster from those
21 nights. See I didn't expect you to remember.
22 That's why I was just asking if you were table
23 to look at these --

24 MS. [REDACTED]: Yeah.

25 MR. [REDACTED]: -- things and be able to

1 determine who it is that actually -. I think
2 this is you. you were on the 10th. So -.

3 MR. [REDACTED]: So we're going to present you
4 with two rosters. One from August 9th, 2019.

5 MR. [REDACTED]: Well I don't think you
6 were on August 9th. Well I guess you were at
7 the 10:00 p.m. So -.

8 MR. [REDACTED]: The 10:00 p.m. And [REDACTED]
9 worked an overnight too. Right? So from
10 August 9th and then also from August 10th. So
11 I'm going to mark it Exhibit 1 on August 9th.
12 And Exhibit 2 for August 10th.

13 MS. [REDACTED]: Okay. This is August
14 10th.

15 MR. [REDACTED]: Can you take a look and let
16 me know who the internal was and who the
17 control was for those nights?

18 MS. [REDACTED]: For both nights?

19 MR. [REDACTED]: Yes, please.

20 MS. [REDACTED]: Okay. I'm currently
21 looking at the assignment roster for Friday,
22 August 9, 2019.

23 MR. [REDACTED]: Let's start with that
24 afternoon. And then the evening.

25 MS. [REDACTED]: You want day watch?

1 MR. [REDACTED]: Yeah. Again, you can go
2 through it.

3 MS. [REDACTED]: Okay. On Friday,
4 August 9, 2019, the day watch. You wanted the
5 control room or you wanted -?

6 MR. [REDACTED]: Let's do control room first.

7 MS. [REDACTED]: The control room
8 number one was Officer [REDACTED].

9 MR. [REDACTED]: Please spell that. I don't
10 have it. Just for the record. Can you spell
11 the name on that?

12 MS. [REDACTED]: Yes. [REDACTED].

13 MR. [REDACTED]: Okay. Officer [REDACTED].

14 MS. [REDACTED]: Yes. And his control
15 number two officer was Officer [REDACTED], [REDACTED]
16 [REDACTED] For the evening watch shift, [REDACTED], [REDACTED],
17 would have been the control number one officer.
18 It seems like it appears. And [REDACTED], [REDACTED]
19 [REDACTED], would have been the control two
20 according to this roster.

21 MR. [REDACTED]: And those were the people
22 that they would have called with the numbers.
23 Correct?

24 MS. [REDACTED]: They generally would
25 call the control number two.

1 MR. [REDACTED]: Okay. Control two.

2 MS. [REDACTED]: Control two. Yes.

3 MR. [REDACTED]: And who was that again?

4 MS. [REDACTED]: On day watch that
5 would have been [REDACTED]. And on evening watch
6 that would have been [REDACTED].

7 MR. [REDACTED]: Now as far as the counts,
8 who would have picked up the slips from
9 internal? Who was that?

10 MS. [REDACTED]: Internal during day
11 watch was Officer [REDACTED] who was overtime.
12 And for the evening watch shift, you had
13 Officer [REDACTED] and they had an internal
14 number two, [REDACTED] - Officer [REDACTED].

15 MR. [REDACTED]: So they would have been
16 the people that like for instance would go to
17 the SHU and pick up the count slips?

18 MS. [REDACTED]: They would go to each
19 floor --

20 MR. [REDACTED]: Sure.

21 MS. [REDACTED]: -- and pick up all
22 the count slips for the entire institution.

23 MR. [REDACTED]: To include for the
24 special housing unit though?

25 MS. [REDACTED]: Everywhere.

1 MR. [REDACTED]: Great.

2 MS. [REDACTED]: Yes. Everywhere.

3 Whether that be medical - wherever we had
4 inmates at that time, they would have been
5 picking up those count slips. Or sometimes if
6 unit team or somebody like that is here. And
7 they're on the unit at the time, you know,
8 they'll say if they're on their way down
9 they'll say I'll take the count slip down. So
10 it just depends on what day it is and what we
11 have going on during that specific time. But
12 for the most part, when no one else has
13 delivered the count slips down, it would be
14 [REDACTED]. Well, on this day, Friday, August
15 9th. It would have been between [REDACTED] and
16 [REDACTED] or both.

17 MR. [REDACTED]: Great. Do you mind just
18 - this is only so that we know what document
19 you're looking at - do you mind just initialing
20 and dating and then circling the people that
21 you just discussed?

22 MS. [REDACTED]: Do you want me to
23 date each one?

24 MR. [REDACTED]: No-no. I'm sorry. Just
25 on the top of the form, just an initial and the

1 date. And then you can just circle the names
2 of the people that you just said. Just for the
3 purposes of the documents that we discussed
4 will be attached to the transcript of this.
5 And it's just to make sure that we have the
6 right document. Thank you. We'll come back to
7 this.

8 MR. [REDACTED]: So I'm going to also present
9 you with the roster for August 10, 2019. Can
10 you do the same for us again? Identify the
11 internal and the control officers?

12 MS. [REDACTED]: Okay.

13 MR. [REDACTED]: Do you want her to be
14 specific though between the hours of 6:00 and
15 8:00 a.m.?

16 MR. [REDACTED]: Yes. So specifically, 10
17 p.m. -.

18 MR. [REDACTED]: So between 10 p.m. and
19 6:00 a.m.

20 MR. [REDACTED]: I think the roster -. What's
21 the time that starts on the roster for August
22 10th? Midnight?

23 MS. [REDACTED]: Midnight. Yeah.

24 MR. [REDACTED]: So let's identify from
25 midnight to let's say -.

1 MR. [REDACTED]: 8:00 a.m. The same shift
2 that you were on.

3 MR. [REDACTED]: Yeah.

4 MS. [REDACTED]: Okay. So I'm looking
5 at the assignment roster for Saturday, August
6 10, 2019. The control number one officer was
7 [REDACTED] who is non-custody. She worked in
8 the R&D - Receiving and Discharge department
9 for - she was on overtime. For day watch,
10 control number one is Officer [REDACTED]. Control
11 number two is Officer [REDACTED] who was on
12 overtime. For evening watch, in the control
13 one position there was Officer [REDACTED] and
14 control two was Officer [REDACTED] who was also
15 non-custody.

16 MR. [REDACTED]: Now when they - when the
17 SHU officers would call control for the counts
18 during that shift, who is it that they would
19 have called? And which counts would have been
20 called? For that shift? I think you said that
21 typically, actually it --

22 MS. [REDACTED]: Typically -.

23 MR. [REDACTED]: -- works from 10:00 p.m.
24 to 6:00 a.m. but it shows on their schedule
25 it's 12:00 to 8:00.

1 MS. [REDACTED]: Well the officers
2 were working those hours.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: The officers were
5 working --

6 MR. [REDACTED]: So just the lieutenants
7 were different?

8 MS. [REDACTED]: -- 12:00 to 8:00.
9 Yes. It was just the lieutenants.

10 MR. [REDACTED]: Okay. So if they
11 actually worked 12:00 to 8:00.

12 MS. [REDACTED]: To 8:00, 8:00 to
13 4:00, and 4:00 to midnight. That's correct.

14 MR. [REDACTED]: Okay. So who on the
15 schedule then when the special housing unit
16 officers would call in, who was it that they
17 would call into?

18 MS. [REDACTED]: They would normally
19 call control two. Now this is not all-
20 inclusive because if control two is busy,
21 sometimes they would call control one. Because
22 control two would be you know sometimes
23 handling back-to-back calls. And plus, they're
24 responsible for answering outside calls and
25 stuff to that nature as well. I mean when

1 people are calling in from the outside, they
2 don't care if they miss count time or not. But
3 the control number two officers work from 6:00
4 to 2:00 to 2:00 to 10:00. Those were their
5 hours.

6 MR. [REDACTED]: Okay.

7 MS. [REDACTED]: Okay? And um.

8 MR. [REDACTED]: So 6:00 a.m. or 6:00
9 p.m.?

10 MS. [REDACTED]: The day watch would
11 work - or the a.m. shift as we call it. They
12 would work from 6:00 a.m. to 2:00 p.m.

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: And the p.m. shift
15 would work 2:00 p.m. to 10:00 p.m.

16 MR. [REDACTED]: Okay. So specifically in
17 the hours that you were working there, who
18 would have been called by the special housing
19 unit?

20 MS. [REDACTED]: Well like I said,
21 they would have been calling because I worked
22 morning watch. They would have been calling -.
23 There wouldn't have been a control two -.

24 MR. [REDACTED]: So that's -.

25 MS. [REDACTED]: Wait a minute.

1 MR. [REDACTED]: So that's so yeah. Let's
2 say for instance the 12:00 p.m. count, the 3:00
3 a.m. count, and the 5:00 a.m. count. Who would
4 have been called then on August 10th?

5 MS. [REDACTED]: They would have been
6 calling control number one because I don't
7 think they had, um -. They would have been
8 calling -. I want to say they was calling
9 control number one. Because at this time, it
10 look like we had a control number two. Because
11 there was a time when internal number two would
12 fill in for the control number two. But it
13 doesn't look like this was during that time.

14 MR. [REDACTED]: To your best guess, who
15 of the officers in the special housing unit,
16 who would have been called? For the 12:00, the
17 3:00, and the 5:00 a.m. counts, who would have
18 been called on those?

19 MS. [REDACTED]: They would have been
20 calling the control center number one.

21 MR. [REDACTED]: And who was that?

22 MS. [REDACTED]: During the 12:00 to
23 8:00 shift that would have been Officer [REDACTED]
24 who, like I said, was on overtime. She's non-
25 custody. She works in the R&D department.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: That's where she's
3 assigned.

4 MR. [REDACTED]: Okay. And then for those
5 same counts, 12:00 a.m., 3:00 a.m., and 5:00
6 a.m., who from internal would have collected
7 those slips?

8 MS. [REDACTED]: It could have been
9 either one of them.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: Because on morning
12 watch, it looks like there was two. But I'm
13 trying to remember at that time if um -.
14 Because sometimes the internal two would assist
15 control because there were other things that
16 needed to be done. But you have for internal
17 there on morning watch there was Officer [REDACTED]
18 and Officer [REDACTED] who was on overtime. Officer
19 [REDACTED] was on overtime for midnight to 8:00. So
20 between those two, they would have been picking
21 up the count slips.

22 MR. [REDACTED]: Just can you repeat those
23 two again?

24 MS. [REDACTED]: That's internal would
25 have been Officer [REDACTED]. And internal number

1 two was Officer [REDACTED]. And he was on overtime.

2 MR. [REDACTED]: Great. Thank you very
3 much.

4 MR. [REDACTED]: Can you do the same with
5 that? Just circle.

6 MR. [REDACTED]: Just circle the names
7 that you just mentioned and then just initial
8 and date on the top.

9 MS. [REDACTED]: Oh, you know what I'm
10 doing?

11 MR. [REDACTED]: It's -.

12 MS. [REDACTED]: I'm putting the date
13 of the roster on here.

14 MR. [REDACTED]: Yeah, I know. You want
15 to date it today. I'm sorry. So today is
16 6/14/21. Sorry. And I'm handing you back the
17 other roster so you can fix that.

18 MR. [REDACTED]: So the August 10th roster I'm
19 going to mark as Exhibit 2. And August 9th
20 will be Exhibit 1.

21 MR. [REDACTED]: I wouldn't. this is -.
22 If you're doing exhibits, this is Exhibit 1.

23 MR. [REDACTED]: Alright.

24 MR. [REDACTED]: If you want to do that.

25 MR. [REDACTED]: Okay.

1 MR. [REDACTED]: Because we're probably
2 going to have to go back to this, I wouldn't
3 mark them as exhibits.

4 MR. [REDACTED]: Okay. No problem.

5 MR. [REDACTED]: Because this is always
6 going to be Exhibit 1.

7 MR. [REDACTED]: I understand. Just to
8 clarify before we move forward. How many
9 counts take place at the MCC? Daily?

10 MS. [REDACTED]: It depends. During
11 the week we have the -. Let's start with day
12 watch. Day watch we have the 4:00 p.m. count.
13 Evening watch we have the 10:00 p.m. count.
14 Morning watch we have the 12:00 a.m., the 3:00
15 a.m., and the 5:00 a.m. So five. On weekends
16 and holidays, we have an additional count of
17 10:00 a.m. which is added for weekends and
18 holidays.

19 MR. [REDACTED]: Okay. Thank you. So I'm
20 going to go back and I'm going to continue
21 reading from that spot. So I'm going to reread
22 that line and we'll move forward.

23 MS. [REDACTED]: Okay.

24 MR. [REDACTED]: In addition to the numbers
25 being recorded and compared to the master list

1 or E-1 sheet, the guards will call in or
2 receive a call from internal and give a verbal
3 record of the account and internal will compare
4 that number to the number that they have on
5 file and advise the count matches and is good
6 or does not match and a count needs to be
7 conducted again. You clarified that. You
8 explained how the control and the internal
9 works. The count slips prepared by the guards
10 are then placed in the area for pickup by
11 another guard assigned in the MCC and brought
12 to control for review. In addition to the
13 official counts that are to be conducted at
14 specific times during each shift, [REDACTED]-
15 [REDACTED] informed that the guards are also
16 responsible for conducting rounds every 30 to 40
17 minutes. During the rounds, the guards simply
18 walk the range and view that the prisoners are
19 alive and in their cells with no issues. The
20 number of prisoners is not recorded, but simply
21 the fact that a round was conducted. And the
22 officers who conducted it is. When asked,
23 [REDACTED] stated that she has no knowledge
24 of rounds or counts not being conducted and
25 that no one would tell her if that were the

1 case.

2 MS. [REDACTED]: As far as the rounds
3 go, the rounds are irregular. So they're not
4 supposed to be done at the same time and
5 there's a reason for that. You know. So the
6 rounds are supposed to be conducted - are
7 usually conducted every hour and they're done
8 on an irregular basis. So that's how the
9 rounds are supposed to be done.

10 MR. [REDACTED]: So you say every hour,
11 it's not every 30 minutes?

12 MS. [REDACTED]: That would be in SHU.

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: Special housing has
15 its own set of rules as far as the count goes
16 but on the other units, and even in SHU the
17 rounds are supposed to be irregular.

18 MR. [REDACTED]: Sure.

19 MS. [REDACTED]: They're not supposed
20 to be like every half hour or something like
21 that.

22 MR. [REDACTED]: Is it correct that it's
23 every 30 minutes but it's supposed to be
24 between 30 and 40 minutes?

25 MS. [REDACTED]: There's a little

1 hangover just for that --

2 MR. [REDACTED]: Sure.

3 MS. [REDACTED]: -- so that the rounds
4 can be irregular if you get tied up. Because
5 when you're making rounds, inmates will stop
6 you. They will hold conversations with you and
7 ask questions. You know and so it's hard to
8 keep those rounds within those guidelines
9 because there's always something to trip you
10 up. When you're making rounds you may notice
11 something out of place, so that would stop you.
12 But as far as those rounds getting conducted,
13 those rounds are supposed to be conducted on an
14 irregular basis. But do understand that there
15 are things that will trip you up. So sometimes
16 you may be on time. Sometimes you -. It's
17 hard to fall within those guidelines because
18 you're - it's live time. Everything is live.
19 So you can't predict what's going to happen
20 while you're making your rounds.

21 MR. [REDACTED]: Understood. And that was a
22 summary of your interview. So as you can see,
23 we have a few questions we want to follow -.

24 MS. [REDACTED]: Right.

25 MR. [REDACTED]: And we've got -.

1 MS. [REDACTED]: You have medical
2 emergencies. You have inmates that are
3 complaining, wait until you start making your
4 rounds to complain about being in pain or
5 something that's hurting them. Or a lot of
6 general stuff. They'll ask you questions just
7 about anything when you're making rounds.

8 MR. [REDACTED]: Understood.

9 MS. [REDACTED]: Mm-hmm.

10 MR. [REDACTED]: I'm going to go back to my
11 interview now and I have a few questions for
12 you. If there were instructions of guidance
13 from upper management, how would you receive
14 them?

15 MS. [REDACTED]: It depends. During
16 that time, they made -. Whoever was in the
17 office may come and say something to the person
18 in the office. And it was left up to everybody
19 else to get that information from that
20 individual.

21 MR. [REDACTED]: Who was in the office at that
22 point? I mean is a certain person assigned to
23 the office or it could be anybody in the
24 office?

25 MS. [REDACTED]: Like the lieutenant.

1 Like a - when I say the office, I'm talking
2 about like the lieutenants' office. So
3 sometimes they would just - and more often than
4 not - they would just say something to whoever
5 is in the office. And that's how everybody is
6 supposed to get that information.

7 MR. [REDACTED]: If there were instructions
8 from the lieutenants, who would give it?

9 MS. [REDACTED]: We would expect the
10 captain to give it.

11 MR. [REDACTED]: Did the instructions that
12 would come from above the captain? Or was it
13 always from the captain?

14 MS. [REDACTED]: Um.... I don't -. I
15 mean, from time to time, some of the AWS would
16 put things out. But the normal chain would be
17 through the captain because that was our
18 immediate supervisor.

19 MR. [REDACTED]: Okay. If you had important
20 details to discuss with your subordinates or
21 COs who report to you, how would you
22 communicate that to them?

23 MS. [REDACTED]: One more time.

24 MR. [REDACTED]: If you had important details
25 or instructions you wanted to discuss with your

1 subordinates or COs, correctional officers, who
2 report to you, how would you communicate those
3 instructions to them?

4 MS. [REDACTED]: I usually did it when
5 I made my rounds. And I would tell them. But
6 you could also do a thing such as 3-3-3s. And
7 that way, that's when everybody come on the
8 line and you could do it that way. But you
9 really didn't have time. It was easier to just
10 tell everybody individually because that way
11 you're with them in person. And it's just
12 easier for you to do it at that time because if
13 they had questions, then they could ask you
14 questions. And when you're doing over the
15 phone at the hole, you're sitting in the
16 office. So you're really not getting anything
17 done, you know. At least if I'm making my
18 rounds, I'm getting my rounds done and I'm
19 doing my - passing down information to my staff
20 at the same time. And also it lets me know
21 that you got it. I'm telling you. it's just
22 you and me. There's no distractions in the
23 background. There's nothing else going on.
24 But it just depends on the person.

25 MR. [REDACTED]: Okay.

1 MS. [REDACTED]: How they got that
2 information to each individual staff.

3 MR. [REDACTED]: Would you communicate that
4 directly with your COs or would you tell
5 another CO to pass on the message?

6 MS. [REDACTED]: It depends on what
7 the information was. I mean things that you
8 want them to know and definitely. If it was
9 something that was a new policy or procedure or
10 something like that, you would definitely want
11 to tell them yourselves because at that time,
12 like I said, there wasn't anything coming out
13 in writing. That's generally how new policy
14 and procedure is put in place. You know you
15 either receive a memorandum saying starting
16 with this memorandum or starting with -
17 effective today or some other date, this is
18 what we're going to be doing. That's generally
19 how that information is put out. Or some type
20 of manual or something like that is updated.
21 Those are the ways that it's generally put out.
22 That way you have the information there and you
23 can refer back to it as needed.

24 MR. [REDACTED]: What if it involved an
25 inmate? Like certain instructions for certain

1 inmates. How would that come out? Would that
2 come out verbally or would that be written?

3 MS. [REDACTED]: It depends on, like I
4 say, the person that's delivering the
5 information. It depended on that.

6 MR. [REDACTED]: On August 9th when you came
7 on shift during that day, you said you were
8 working overnight.

9 MS. [REDACTED]: Yes.

10 MR. [REDACTED]: So technically, weren't you
11 on shift August 9th nighttime? Morning watch?
12 Do you remember?

13 MS. [REDACTED]: August 9th going into
14 August 10th.

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: So -.

17 MR. [REDACTED]: Did you work the day before
18 too? You don't recall.

19 MS. [REDACTED]: I don't know if I did
20 or not. I may have.

21 MR. [REDACTED]: Let's try to focus -.

22 MS. [REDACTED]: Yeah. I don't know.

23 MR. [REDACTED]: No problem. So let's talk
24 about August -.

25 MR. [REDACTED]: Um, so if you're asking -

1 -

2 MS. [REDACTED]: What do you mean did
3 I work --

4 MR. [REDACTED]: -- specifically August
5 9th --

6 MS. [REDACTED]: -- day watch or -?

7 MR. [REDACTED]: It looks like she was on
8 from midnight to 8:00 the day before.

9 MR. [REDACTED]: Day before too.

10 MR. [REDACTED]: So that means you would
11 have left at 6:00 a.m. on August 9th.

12 MS. [REDACTED]: Right. And came back
13 -.

14 MR. [REDACTED]: And come back at 10:00
15 p.m.

16 MS. [REDACTED]: That's correct.

17 MR. [REDACTED]: So let's focus on 10:00
18 p.m. to 6:00 a.m. August 9th night going into
19 August 10th day.

20 MS. [REDACTED]: Right. Because I
21 don't think I worked evening watch.

22 MR. [REDACTED]: No there's a reason. Can I -
23 ?

24 MR. [REDACTED]: Sure. I'm just saying
25 she's done at 6:00 a.m. not at 8:00.

1 MR. [REDACTED]: Yeah, that's what I wanted to
2 ask.

3 MS. [REDACTED]: Okay.

4 MR. [REDACTED]: So I just want to clarify.
5 That day, I know you don't recall but according
6 to the schedule, what is that showing? What
7 time did you leave on August 9th morning?

8 MS. [REDACTED]: Oh. I would have
9 left probably - it depends on who was relieving
10 me. I probably would have left probably before
11 6:00.

12 MR. [REDACTED]: Before 6:00.

13 MS. [REDACTED]: Mm-hmm.

14 MR. [REDACTED]: Would you -?

15 MS. [REDACTED]: 6:00 a.m.

16 MR. [REDACTED]: 6:00 a.m. By 6:00 a.m.,
17 would you happen to have heard if there was an
18 inmate being removed from the MCC? Or did that
19 come afterwards? Let's say they -.

20 MS. [REDACTED]: What on August 9th?

21 MR. [REDACTED]: August 9th.

22 MS. [REDACTED]: I don't recall. What
23 day did Epstein die? Because I don't even
24 remember what day he passed.

25 MR. [REDACTED]: August 10th.

1 MS. [REDACTED]: Okay.

2 MR. [REDACTED]: Well that's when he was
3 found.

4 MS. [REDACTED]: Okay.

5 MR. [REDACTED]: He was found August 10th
6 morning.

7 MS. [REDACTED]: So you said -.

8 MR. [REDACTED]: August 9th. That would be
9 Friday morning. Right? You left the shift it
10 looks like 6:00 a.m. Right?

11 MS. [REDACTED]: Which would have been
12 Saturday morning.

13 MR. [REDACTED]: No-no. Sorry. I should
14 clarify. August 9th --

15 MS. [REDACTED]: Oh.

16 MR. [REDACTED]: -- morning is Friday morning.

17 MS. [REDACTED]: Okay. Friday
18 morning.

19 MR. [REDACTED]: Friday morning, you did the
20 overnight shift. Then you left. And then you
21 came back August 9th, 10:00 p.m. and you worked
22 until 6:00 a.m.

23 MS. [REDACTED]: Right.

24 MR. [REDACTED]: Now I'm talking about August
25 9th -. Let's say August 8th 10:00 p.m. to

1 August 9th -.

2 MS. [REDACTED]: Oh my God.

3 MR. [REDACTED]: The reason I'm asking is I'm
4 just trying to clarify. Would you have known
5 if any instructions came about inmates having
6 to be brought out for court or anything like
7 that. Would you have heard about it before you
8 left?

9 MS. [REDACTED]: We're talking about
10 August -.

11 MR. [REDACTED]: 9th.

12 MS. [REDACTED]: I mean I may have. I
13 can't recall.

14 MR. [REDACTED]: Okay. But does it happen
15 before 6:00 a.m. or it happens after 6:00 a.m.
16 normally?

17 MS. [REDACTED]: You mean like inmates
18 that are going to court?

19 MR. [REDACTED]: Going to court or being
20 removed from the prison for whatever reason.

21 MS. [REDACTED]: I mean if it involved
22 me. Say if we had an inmate up on 10 South.
23 Because those inmates up there are generally 3-
24 man holes. So if there was an inmate that I
25 had to physically be involved in escorting,

1 yes. They would notify me or the activities
2 lieutenant. It just depends.

3 MR. [REDACTED]: No problem. Now I'm going to
4 keep going. Are you familiar with Inmate
5 Jeffrey Epstein?

6 MS. [REDACTED]: Yes.

7 MR. [REDACTED]: Okay. Did you work in the
8 SHU while Epstein was assigned to the SHU?

9 MS. [REDACTED]: No.

10 MR. [REDACTED]: Okay. Do you recall if
11 Epstein had a cellmate?

12 MS. [REDACTED]: At some point he had
13 a cellmate.

14 MR. [REDACTED]: Okay. Were you aware that
15 Epstein had attempted to commit suicide before?

16 MS. [REDACTED]: Yes.

17 MR. [REDACTED]: Okay. Do you recall around
18 what time - what date it was?

19 MS. [REDACTED]: I know it was in
20 July. I can't remember the exact date. But I
21 know it was in July.

22 MR. [REDACTED]: Were you there for that
23 incident?

24 MS. [REDACTED]: Yes.

25 MR. [REDACTED]: Okay. Quickly, do you

1 remember? Like a short summary what
2 transpired?

3 MS. [REDACTED]: Um, we were called to
4 the special housing unit. I think when we got
5 there and Officer Thomas was working that day.
6 When we got there, the officer informed us that
7 an inmate had tried to hurt himself. So we go
8 up to the cell and it's Epstein.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: And he's lying on the
11 floor seemingly out of it I guess you could
12 say. But when we tap him and we move him, we
13 could see him kind of looking up at us. But
14 then he would close his eyes like he didn't
15 want us to know that he was actually conscious.

16 MR. [REDACTED]: Okay.

17 MS. [REDACTED]: So we couldn't get
18 anything from him. He wouldn't respond to us.
19 But we knew that he was okay. He was
20 breathing. And like I said, he would look up
21 at us from time to time. When he didn't think
22 that we were looking at him.

23 MR. [REDACTED]: Okay.

24 MS. [REDACTED]: And -.

25 MR. [REDACTED]: What happened after that?

1 Was Epstein placed on suicide watch or psych
2 observation?

3 MS. [REDACTED]: Yes. He was placed
4 on suicide watch.

5 MR. [REDACTED]: Okay.

6 MS. [REDACTED]: Officer Thomas was
7 assigned to watch him. And he literally stood
8 there at his cell all night watching him and
9 talking to him.

10 MR. [REDACTED]: Who was?

11 MS. [REDACTED]: Officer Thomas.

12 MR. [REDACTED]: Okay. Same Thomas?

13 MS. [REDACTED]: Yes.

14 MR. [REDACTED]: [REDACTED] Thomas?

15 MS. [REDACTED]: Yes.

16 MR. [REDACTED]: Okay.

17 MS. [REDACTED]: Yes.

18 MR. [REDACTED]: How long - do you recall how
19 long he was on suicide watch?

20 MS. [REDACTED]: I don't recall.

21 MR. [REDACTED]: Okay. No problem. Now was
22 he eventually removed from suicide watch?

23 MS. [REDACTED]: Yes.

24 MR. [REDACTED]: What happened after suicide
25 watch? Was he placed on any of the

1 observation? Or -?

2 MS. [REDACTED]: I don't remember. I
3 don't remember if he went from suicide watch to
4 psych ops or if he went from suicide watch
5 straight back to the special housing unit.

6 MR. [REDACTED]: So suicide watch - where does
7 that take place?

8 MS. [REDACTED]: That's on the second
9 floor.

10 MR. [REDACTED]: Second floor. What unit?

11 MS. [REDACTED]: Medical.

12 MR. [REDACTED]: Medical?

13 MS. [REDACTED]: It's right out -.
14 It's like an extension to the medical unit
15 slash -. At that time, we had - there was a
16 female housing unit there. So it's adjacent to
17 the female housing unit. But the second floor
18 is our medical floor aside from the housing
19 unit.

20 MR. [REDACTED]: Okay.

21 MS. [REDACTED]: And the psych unit.

22 MR. [REDACTED]: When Epstein was returned
23 back to the SHU. Do you recall any
24 instructions being given by upper management,
25 executive staff, regarding Epstein being

1 assigned with a cellmate?

2 MS. [REDACTED]: No.

3 MR. [REDACTED]: Okay. Did you -? I'm going
4 to go through each. Did you receive any
5 instruction from Captain [REDACTED] in regard to
6 this?

7 MS. [REDACTED]: No.

8 MR. [REDACTED]: Okay. Do you recall? I'm
9 going to ask. Do you recall receiving an email
10 from psych instructing that Epstein needed a
11 cellmate?

12 MS. [REDACTED]: No.

13 MR. [REDACTED]: I'm going to show you a
14 document. Right? Read that document. Who is
15 that email from?

16 MS. [REDACTED]: This is from [REDACTED]
17 [REDACTED].

18 MR. [REDACTED]: And who is that?

19 MS. [REDACTED]: She was a
20 psychologist here at the time.

21 MR. [REDACTED]: Okay. And what is the
22 summary of that email?

23 MS. [REDACTED]: It's says inmate
24 Epstein register number 76318-054 is being
25 taken off of psych observation and needs to be

1 housed with an appropriate cellmate.

2 MR. [REDACTED]: What's the date of that
3 email?

4 MS. [REDACTED]: This is July 30, 2019
5 at 12:30 p.m.

6 MR. [REDACTED]: Do you recall getting that
7 email?

8 MS. [REDACTED]: I don't recall. This
9 is the first I've seen of this email. This is
10 the first time I've seen this email.

11 MR. [REDACTED]: So if you flip through the
12 pages, it actually shows you the recipients.
13 Is your name on that?

14 MS. [REDACTED]: If she sent it to the
15 lieutenants group, I'm sure - more than likely
16 -.

17 MR. [REDACTED]: There's a -.

18 MS. [REDACTED]: Yeah.

19 MR. [REDACTED]: It's in alphabetical order.

20 MS. [REDACTED]: Yeah. Yes, I'm here.

21 MR. [REDACTED]: Is there a reason why that -?
22 I mean, you don't recall reading that email
23 yourself then.

24 MS. [REDACTED]: I don't even remember
25 seeing this email.

1 MR. [REDACTED]: Okay. Did you ever
2 participate in executive committee meetings?

3 MS. [REDACTED]: No.

4 MR. [REDACTED]: Okay. That was just the
5 higher ups? You don't even know who -?

6 MS. [REDACTED]: I don't even know
7 what that -.

8 MR. [REDACTED]: Okay. No problem.

9 MS. [REDACTED]: Yeah, I don't -.

10 MR. [REDACTED]: Okay. So I'll move on.

11 MR. [REDACTED]: Initial and date.

12 MR. [REDACTED]: Yeah. Sorry. Can you
13 initial and date that document for me? I'm
14 going to mention some names. Can you just let
15 me know what, if any, conversations you had
16 with any of these people regarding Epstein and
17 Epstein needing a cellmate at all times?
18 Captain [REDACTED]. Lieutenant [REDACTED] [REDACTED].

19 MS. [REDACTED]: Okay. What do you
20 want me to do? I'm sorry.

21 MR. [REDACTED]: No. I'm going to through the
22 names.

23 MS. [REDACTED]: Okay.

24 MR. [REDACTED]: If you recall if you had a
25 conversation with any of these people in regard

1 to Epstein and Epstein needing a cellmate.

2 MS. [REDACTED]: Okay.

3 MR. [REDACTED]: Okay? This is prior to the
4 incident.

5 MS. [REDACTED]: Okay.

6 MR. [REDACTED]: Captain [REDACTED] [REDACTED].

7 Lieutenant [REDACTED] [REDACTED]. Lieutenant [REDACTED]
8 [REDACTED].

9 MR. [REDACTED]: You need to let her say
10 yes or no after each one.

11 MR. [REDACTED]: Okay. Sorry. Apologize.
12 Have you ever had a conversation with [REDACTED] -
13 Captain [REDACTED] - in regard to Epstein needing a
14 cellmate?

15 MS. [REDACTED]: No.

16 MR. [REDACTED]: What about Lieutenant [REDACTED]
17 [REDACTED]?

18 MS. [REDACTED]: No.

19 MR. [REDACTED]: Lieutenant [REDACTED] [REDACTED].

20 MS. [REDACTED]: No.

21 MR. [REDACTED]: Lieutenant [REDACTED] [REDACTED].

22 MS. [REDACTED]: No.

23 MR. [REDACTED]: Lieutenant [REDACTED].

24 MS. [REDACTED]: No.

25 MR. [REDACTED]: Lieutenant [REDACTED] [REDACTED].

1 MS. [REDACTED]: No.

2 MR. [REDACTED]: Lieutenant [REDACTED] [REDACTED].

3 MS. [REDACTED]: No.

4 MR. [REDACTED]: Now following that I have a
5 few more names. The rest are correctional
6 officers. Same thing. Have you had any
7 conversations with them about Epstein requiring
8 a cellmate? CO [REDACTED] [REDACTED].

9 MS. [REDACTED]: No.

10 MR. [REDACTED]: CO [REDACTED] [REDACTED].

11 MS. [REDACTED]: No.

12 MR. [REDACTED]: If I mispronounce the name,
13 please correct me. CO [REDACTED] [REDACTED].

14 MS. [REDACTED]: No.

15 MR. [REDACTED]: CO Michael Thomas.

16 MS. [REDACTED]: No.

17 MR. [REDACTED]: CO Tova Noel.

18 MS. [REDACTED]: No.

19 MR. [REDACTED]: CO [REDACTED] [REDACTED].

20 MS. [REDACTED]: No.

21 MR. [REDACTED]: CO [REDACTED] [REDACTED].

22 MS. [REDACTED]: No.

23 MR. [REDACTED]: CO [REDACTED] [REDACTED].

24 MS. [REDACTED]: [REDACTED]? [REDACTED]?

25 MR. [REDACTED]: Yeah.

1 MS. [REDACTED]: No.

2 MR. [REDACTED]: How about SOS [REDACTED]

3 [REDACTED]?

4 MS. [REDACTED]: No.

5 MR. [REDACTED]: Okay. When did you become

6 aware of Inmate [REDACTED] [REDACTED] being removed from

7 the MCC? [REDACTED] [REDACTED]. Do you know who [REDACTED]

8 [REDACTED] is?

9 MS. [REDACTED]: I don't even know who

10 that is.

11 MR. [REDACTED]: Okay. Do you recall who was

12 Epstein's cellmate?

13 MS. [REDACTED]: When?

14 MR. [REDACTED]: During that period? After he

15 came back from suicide watch?

16 MS. [REDACTED]: No.

17 MR. [REDACTED]: Okay.

18 MR. [REDACTED]: Do you remember if he had

19 one after that? We're talking about July 30th

20 when he came back. Are you -?

21 MS. [REDACTED]: I didn't know if he

22 had one or not.

23 MR. [REDACTED]: Okay.

24 MS. [REDACTED]: Um. No. I didn't

25 know if he had a cellmate or not to be honest

1 with you. No.

2 MR. [REDACTED]: And you're not aware of any
3 requirements of him having a cellmate either?

4 MS. [REDACTED]: I wasn't even aware
5 that they had sent out some information
6 regarding the fact that he needed to have a
7 cellmate. I would think that they would be -
8 that that would be something that they would
9 verbalize.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: That they would make
12 sure that we individually -. That they would
13 check to make sure that we all read that
14 message.

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: I mean if it was
17 something that was critical -. Because he was
18 on suicide watch. And because of the
19 circumstances that surrounded him. I would
20 expect for them to follow-up and make sure that
21 we all read that email and we were all aware
22 that he was to have a cellie.

23 MR. [REDACTED]: Who would you expect to do
24 that?

25 MS. [REDACTED]: I would expect for

1 psychology to follow-up with us. I would
2 expect for definitely the captain to get with
3 us individually and tell us.

4 MR. [REDACTED]: Okay.

5 MS. [REDACTED]: Hold a lieutenant's
6 meeting or something to let us know that we
7 were to make sure that he had a cellmate.

8 MR. [REDACTED]: Okay. If - let's say. Have
9 you ever dealt with an inmate that required a
10 cellmate before?

11 MS. [REDACTED]: Not directly, no.
12 No.

13 MR. [REDACTED]: But do you -? Okay. You
14 never have. But if let's say an inmate was
15 required to have a cellmate. And that cellmate
16 was removed for whatever reason. Do you know
17 what the procedure would be?

18 MS. [REDACTED]: If an inmate was
19 required to have a cellmate. And everybody
20 knew. Because when you're talking about an
21 inmate that needs a cellmate, it's not just the
22 lieutenants who work with that inmate. The
23 officers are the ones who are assigned to that
24 inmate housing unit. Around the clock, 24/7.
25 So you would definitely want that information.

1 That should be an all staff email to be honest
2 with you. Because that way everybody in the
3 institution knows that there's an important
4 reason why that inmate needs a cellmate. And
5 that way if at some point in time it's not
6 happening or there's a lapse in that, everybody
7 knows. So you've got - because you have staff
8 making rounds around the institution on the
9 housing units and all of that stuff all the
10 time. You know. different members of the
11 institution staff. So that would be an all
12 staff email just to alert everybody in the
13 institution that, you know, if you're ever in
14 that area and you come across this inmate and
15 he doesn't have a cellie, then you need to
16 follow-up, ask why, make sure somebody knows
17 that that inmate don't have a cellie.

18 MR. [REDACTED]: I'm going to clarify. Based
19 on the fact that based on what we - our
20 investigation. Inmate [REDACTED] [REDACTED] was assigned
21 as a cellmate for Jeffrey Epstein.

22 MS. [REDACTED]: Okay.

23 MR. [REDACTED]: And he was required -
24 according to psychology - he was required to
25 have a cellmate. Now Inmate [REDACTED] [REDACTED] was

1 removed from the MCC on August 9th morning
2 during the day watch. Now based on - I'm going
3 to read you the names again. Right. And you
4 just tell me. You might not know it directly,
5 but who would be responsible to take what
6 action when they found out that [REDACTED] [REDACTED] was
7 removed. If there was a requirement, that
8 Epstein had to have a cellmate at all times,
9 and his cellmate was removed, who would be
10 responsible to take action? And I'm going to
11 mention the names. Let me know what their role
12 would have been and what action they should
13 have taken.

14 MS. [REDACTED]: You're telling -.
15 You want me to tell you that. That's if in
16 fact they knew -.

17 MR. [REDACTED]: Yeah. If in fact they knew.

18 MS. [REDACTED]: Yeah. If in fact
19 they knew that he was supposed to have a
20 cellie.

21 MR. [REDACTED]: Yes.

22 MS. [REDACTED]: You know. Not
23 assuming that he had a cellie.

24 MR. [REDACTED]: And so we don't have to
25 go back and circle back to this. Not only - so

1 if he's naming a name, say what action should
2 have they taken and who should have told them
3 the information with regard to the need to have
4 a cellmate.

5 MS. [REDACTED]: Well I would have to
6 know what position those officers had --

7 MR. [REDACTED]: Sure.

8 MS. [REDACTED]: -- at the time that
9 this occurred also. Because -.

10 MR. [REDACTED]: We can hand you the roster
11 again.

12 MR. [REDACTED]: So this is the August
13 9th. I'll give you that one first.

14 MR. [REDACTED]: But just start with
15 (Indiscernible *00:58:18).

16 MR. [REDACTED]: Again, so he was removed
17 from his cell let's say around 8:30 a.m. and I
18 think he was removed from the institution
19 somewhere around 1:30 p.m. So 8:30 is when he
20 went to a court. And then by 1:30 he was gone.

21 MR. [REDACTED]: They were pretty much
22 notified he's not coming back.

23 MS. [REDACTED]: Mm.

24 MR. [REDACTED]: So I'll start with Captain
25 [REDACTED].

1 MS. [REDACTED]: Yes. Captain [REDACTED]
2 should have known.

3 MR. [REDACTED]: How would he have known? Who
4 should have made him aware of it?

5 MR. [REDACTED]: Let's just - instead of
6 going through it, let's just first start with
7 going from the bottom up. Who should have
8 known that he was removed? And how should the
9 chain of command have gone up? Looking at that
10 duty schedule roster.

11 MR. [REDACTED]: Yeah. Based on that. Who
12 should have initially known that he was
13 removed?

14 MS. [REDACTED]: Well R&D should have
15 known initially that the inmate was removed.
16 Now whether or not they would have known that
17 he was Epstein's cellie is something different.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: Like I said, if this
20 information had put out because Epstein was a
21 high-profile inmate. He had just attempted
22 suicide. That should have been an all-staff
23 email. That should have alerted everybody.
24 And not only that, but when that happens.
25 First of all, when Epstein originally arrived

1 to the MCC, Epstein should have been placed on
2 10 South. That's our - what they consider the
3 maximum-security unit here. He never should
4 have been placed on 10 South anyway because
5 you're not guaranteed that anybody in this
6 building is going to maintain a cellie because
7 it's an administrative institution. Inmates
8 come and go all the time. So there's - they
9 don't have a sentence date. And with that
10 said, that means that at any point and time
11 while we're sitting here, the courts can
12 release somebody and that inmate is gone right
13 now. So to put out an email to certain
14 individuals and not make that an all-staff
15 email so that it would -. And I guess we have
16 to go back and say what was the intentions of
17 that? If it's something that you feel is
18 concerning and that absolutely needs to happen
19 because you still feel that this inmate is at
20 risk, then you say to yourself, well why is he
21 being released from suicide watch? Or psych
22 ops. Why, you know? If you feel that this
23 inmate still needs this type of supervision.
24 And if the answer to that is yes, he still
25 needs that type of supervision, then you would

1 recommend that, you know, why don't you keep
2 him?? Why aren't you maintaining him? You
3 know. On watch? If he requires that type of
4 supervision? Or why - since you didn't do it
5 to begin with - which they should have done.
6 Considering he was high-profile, he was an at-
7 risk inmate, just the fact that he was a high-
8 profile inmate, he should have been placed on
9 10 South. After he attempted suicide and they
10 determined that they was going to remove him
11 from that and required him to have a cellie.
12 Then they should have either made it an all-
13 staff email, made sure everybody was aware -
14 everybody. Not just -. And it's difficult
15 because people are on days off, people are on
16 vacation, people are on sick leave, you see
17 what I'm saying?

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: So for somebody like
20 Epstein. Epstein should have automatically
21 gone to 10 South where he would have had 24-
22 hour monitoring on him at all times.

23 MR. [REDACTED]: Okay. Assuming that the CO -
24 . Let's start with the COs. Assuming the COs
25 in the SHU knew that this was a requirement.

1 In day watch. If he was removed at 8:30, who
2 is responsibility would it have been to notify
3 upwards?

4 MS. [REDACTED]: It would have been
5 any of their responsibility if they were there
6 at the time and they were aware that he was
7 being moved or if they knew that he was even
8 supposed to have a cellie.

9 MR. [REDACTED]: So who was the COs on for the
10 SHU?

11 MS. [REDACTED]: On -?

12 MR. [REDACTED]: Day watch for August 9th.

13 MS. [REDACTED]: Day watch on August
14 9th would have been Officer [REDACTED], Officer
15 [REDACTED], [REDACTED], and [REDACTED].

16 MR. [REDACTED]: Okay. And what would - if
17 they knew that Epstein was required to have a
18 cellmate, what should they have done?

19 MS. [REDACTED]: If they knew that
20 Epstein required a cellie, and his cellie was
21 released, if they knew he wasn't coming back.
22 I mean I don't know if they knew that when the
23 cellie left that he was never coming back. I
24 don't know what any of these people were told.
25 So I'm just assuming here. If his cellie was

1 released, and they knew for a fact that he
2 wasn't coming back, and if they knew that he
3 was supposed to have a cellie, which I doubt.
4 Because I didn't even know it. So -.

5 MR. [REDACTED]: Let's just assume they knew.
6 Let's just go from there. If they knew.

7 MS. [REDACTED]: Then one of them
8 should have called.

9 MR. [REDACTED]: Called who?

10 MS. [REDACTED]: The captain,
11 psychology, the lieutenant's office. One of
12 them.

13 MR. [REDACTED]: Okay. And let's just say
14 they called the lieutenant's office. What
15 would the lieutenant's office have done?

16 MS. [REDACTED]: They would have
17 followed up. They would have been like okay,
18 if they didn't know already, they would have
19 determined what's the status of this cellmate.
20 What is -? Is he coming back? They probably
21 would have moved Epstein out of that cell or
22 immediately put another inmate in the cell with
23 him.

24 MR. [REDACTED]: Okay.

25 MS. [REDACTED]: But when you're

1 talking about somebody like Epstein, you just
2 can't just put any inmate in that cell with
3 Epstein. So you know, you kind of have to seek
4 guidance on that and tell - let somebody know
5 what you have going on so they can determine
6 who they want in the cell with Epstein. Which
7 is why it goes back to 10 South. That's why he
8 should have been on 10 South because you can't.
9 He's not one of those inmates that you can just
10 put anybody in his cell with him.

11 MR. [REDACTED]: Who would you have - seeked
12 guidance from?

13 MS. [REDACTED]: Me?

14 MR. [REDACTED]: Yeah.

15 MS. [REDACTED]: As a lieutenant?

16 MR. [REDACTED]: To assign - get a new inmate
17 for Epstein. Who do you think? Because you
18 said he's high profile. Who would you have -?

19 MS. [REDACTED]: I would have informed
20 the captain --

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: -- that you know the
23 cellie that he had had been released and asked
24 him you know how do you want us to move
25 forward?

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: Who do you want the
3 SHU officers to place in that cell with him?

4 MR. [REDACTED]: So as per whoever the CO is
5 they should report it to the lieutenant or the
6 captain and they would have brought it up and
7 someone higher up should have assigned a
8 cellmate.

9 MS. [REDACTED]: The officers if they
10 knew.

11 MR. [REDACTED]: Yeah.

12 MS. [REDACTED]: If they were aware
13 that he was supposed to have had a cellmate and
14 based upon that email that I just saw for the
15 first time, I'm sure they didn't - in this
16 group here. Oh they would have contacted
17 somebody.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: These guys definitely
20 were not you know [REDACTED], [REDACTED], [REDACTED],
21 [REDACTED], these cats - they wouldn't have ignored
22 that. They would have told somebody. If they
23 knew, they would have definitely reported it to
24 somebody. And um -.

25 MR. [REDACTED]: How soon should have an

1 inmate been assigned to that cell? Normally,
2 what's the procedure? How soon after would
3 they -?

4 MS. [REDACTED]: I say that Epstein
5 should have been on 10 South.

6 MR. [REDACTED]: Okay.

7 MS. [REDACTED]: So I mean, as quick
8 as possible.

9 MR. [REDACTED]: Okay. That's it.

10 MS. [REDACTED]: Yeah. As quick as
11 possible.

12 MR. [REDACTED]: I'm not going to go through
13 names. You just explained this from the bottom
14 up. We just wanted to clarify.

15 MS. [REDACTED]: Okay.

16 MR. [REDACTED]: I'm going to move on. Did
17 you conduct on August 9th evening from 10:00
18 p.m. to August 10th the next day? Did you
19 conduct any rounds in the SHU during your
20 shift?

21 MS. [REDACTED]: Yes.

22 MR. [REDACTED]: What rounds did you do. Do
23 you recall? What count or rounds did you do in
24 the SHU?

25 MS. [REDACTED]: I don't remember what

1 rounds.

2 MR. [REDACTED]: Okay.

3 MS. [REDACTED]: I think it was
4 probably mid-morning I think. What do you mean
5 by rounds? Do you mean did I conduct my
6 lieutenant rounds?

7 MR. [REDACTED]: Yeah. Lieutenant rounds.

8 MS. [REDACTED]: Yeah. Yeah.

9 MR. [REDACTED]: Mid-morning?

10 MS. [REDACTED]: I think it was mid-
11 morning because there was a lot going on that
12 night.

13 MR. [REDACTED]: No problem.

14 MS. [REDACTED]: So I was running
15 behind.

16 MR. [REDACTED]: Let's clarify this
17 because you weren't there mid-morning.

18 MR. [REDACTED]: Mid-morning you mean
19 overnight.

20 MS. [REDACTED]: Yes. Overnight.

21 MR. [REDACTED]: Okay. So when you say
22 mid you mean like 4:00 a.m. on August 10th is
23 what you're saying?

24 MS. [REDACTED]: Yeah. Probably.
25 That sounds about right.

1 MR. [REDACTED]: Okay.

2 MR. [REDACTED]: Now I just have two
3 questions. Why do COs have to conduct rounds?

4 MS. [REDACTED]: To make sure that the
5 inmates are safe. That they're still
6 breathing. That there is nothing illegal or
7 unauthorized going on inside the institution.
8 Just to make sure that everything is okay.

9 MR. [REDACTED]: Okay. Is it -? Why do COs
10 have to conduct counts?

11 MS. [REDACTED]: To account for all
12 the inmates.

13 MR. [REDACTED]: Okay. Is it mandatory to
14 conduct counts and rounds?

15 MS. [REDACTED]: It's part of your
16 duties.

17 MR. [REDACTED]: Okay. Is it policy?

18 MS. [REDACTED]: Yes, it's policy.

19 MR. [REDACTED]: Okay. And you explained in
20 your previous interview about who is
21 responsible for conducting the rounds. As a
22 supervisor, you mentioned in your previous
23 interview that the supervisor should also
24 conduct one round per -. One count or one
25 round? I mean what are they -?

1 MS. [REDACTED]: Each lieutenant is
2 required to make rounds during their shift.
3 Whether that be the operations lieutenant or
4 whether that be the activities lieutenant.
5 Just a lieutenant. It doesn't have to be both.
6 If I'm operations lieutenant and I have an
7 activities lieutenant assigned, both of us
8 don't have to make rounds. The lieutenant - a
9 lieutenant just have to make rounds during each
10 respective shift.

11 MR. [REDACTED]: Is there specific units that
12 they have to go to or can it be anything?

13 MS. [REDACTED]: I mean if you're
14 making rounds, the idea is to go to each
15 housing unit.

16 MR. [REDACTED]: Okay.

17 MS. [REDACTED]: Now depending on what
18 you have going on during the night, sometimes
19 you may get that done. Sometimes you don't. I
20 mean there may be a lot going on at the
21 institution that you may not get around to
22 making the rounds done during your shift.

23 MR. [REDACTED]: Okay. I want to take a quick
24 detour. I'm going to show you two documents.
25 Can you show me what that is a map of?

1 MS. [REDACTED]: I have no idea.

2 MR. [REDACTED]: If you don't understand it --

3 MS. [REDACTED]: Yeah, I don't --

4 MR. [REDACTED]: -- then just say it.

5 MS. [REDACTED]: -- know what this is.

6 MR. [REDACTED]: Okay. No problem. How many
7 tiers are there for the SHU?

8 MS. [REDACTED]: I haven't been up
9 there in a while. I'm going to say there is
10 two. There's four tiers. I mean if you're
11 talking about upstairs and downstairs, there's
12 two tiers.

13 MR. [REDACTED]: Two tiers.

14 MS. [REDACTED]: Mm-hmm. And then you
15 have 10 South. And then you have Lower 10
16 South. So. If you count each individual tier,
17 I guess you would say five tiers. Because you
18 got Lower 10 South up there as well.

19 MR. [REDACTED]: Okay. Five tiers.

20 MS. [REDACTED]: Mm-hmm.

21 MS. [REDACTED]: Thank you. I'm going
22 to move on. I'm going to show you a document.
23 Can you tell me what that is?

24 MS. [REDACTED]: This is the E-1.

25 MR. [REDACTED]: What's an E-1?

1 MS. [REDACTED]: The E-1 is a
2 computation of all the housing units. Well it
3 includes all the housing units and how many
4 inmates they have on their unit at the time in
5 which this is actually printed.

6 MR. [REDACTED]: What time is that for?

7 MS. [REDACTED]: It says August 10,
8 2019 at 12:35 --

9 MR. [REDACTED]: 12:35. And can you -?

10 MS. [REDACTED]: -- a.m.

11 MR. [REDACTED]: Can you find the count for
12 the SHU in there? You can flip through it.
13 You can -.

14 MS. [REDACTED]: Yeah. It's -.

15 MR. [REDACTED]: What units are they reflected
16 by? What do they call the units on the
17 document? Are they referred to as the SHU? Or
18 are they referred to by a different name?

19 MS. [REDACTED]: They're referred to
20 by alphabets.

21 MR. [REDACTED]: What alphabets?

22 MS. [REDACTED]: For special housing
23 unit, it would be ZA. And their count is - at
24 this time - on August 10, 2019 at 0035, it was
25 72.

1 MR. [REDACTED]: If you flip through it, it
2 will tell you there might be more documents.
3 Keep going. It'll tell you who did the counts.
4 Do you recall who -? Based on the document,
5 can you tell me who did the count for the SHU?
6 Which SHU unit - ZA or ZB - was Epstein housed
7 in?

8 MS. [REDACTED]: Epstein was in ZA.

9 MR. [REDACTED]: ZA. And who did the count at
10 12 midnight?

11 MS. [REDACTED]: There was an issue
12 with the count at midnight.

13 MR. [REDACTED]: What was the issue?

14 MS. [REDACTED]: There was an inmate
15 that they had removed from the unit and he was
16 on - he was being housed in the receiving and
17 discharge in one of the holding cells in R&D on
18 the third floor. And -.

19 MR. [REDACTED]: Do you recall if that was
20 Inmate [REDACTED]?

21 MS. [REDACTED]: I don't know what.

22 MR. [REDACTED]: Okay.

23 MS. [REDACTED]: I don't remember what
24 his name was.

25 MR. [REDACTED]: Okay.

1 MS. [REDACTED]: But they were for
2 some reason -. I want to say. I don't know if
3 he was on dry cell or what his status was.

4 MR. [REDACTED]: Was -?

5 MS. [REDACTED]: I don't think he was
6 on suicide watch. I can't remember.

7 MR. [REDACTED]: You said dry cell. Now dry
8 cell. Is that in R&D?

9 MS. [REDACTED]: No. That's not in
10 R&D. Usually dry cell is done in the special
11 housing unit. So I can't remember what his
12 status was but he was -. I can't remember if
13 he was on dry cell or if he was on - if that
14 was an extension of the suicide watch. I can't
15 remember, but there was an inmate down there.
16 And he was being housed down there with the
17 watch on that particular night. And they were
18 counting him on the unit because they hadn't
19 received any guidance as to how he was going to
20 be counted. Because R&D, mind you, is the
21 intake unit. It's not a housing unit.

22 MR. [REDACTED]: Okay.

23 MS. [REDACTED]: So inmates are
24 theoretically are not supposed to be staying -
25 spending the night down there.

1 MR. [REDACTED]: So R&D. So they do mainly
2 intake you said. Right?

3 MS. [REDACTED]: That's what they do.
4 Yeah.

5 MR. [REDACTED]: If they move an inmate to R&D
6 what would it be for? Are they leaving the
7 (Indiscernible *01:14:14)?

8 MS. [REDACTED]: Yeah because they're
9 leaving or they're going to court or something
10 like that.

11 MR. [REDACTED]: On that sheet, what would you
12 identify the area - the unit - as for R&D on
13 there?

14 MS. [REDACTED]: RA.

15 MR. [REDACTED]: RA?

16 MS. [REDACTED]: Yes.

17 MR. [REDACTED]: Okay. Now based on that, you
18 said there was an issue with it.

19 MS. [REDACTED]: Right. Because if
20 you have an inmate in RA, then it's going to
21 interfere with the special housing unit count.
22 If this inmate that's here on RA is from
23 special housing. Okay.

24 MR. [REDACTED]: Yeah.

25 MS. [REDACTED]: When this - um.

1 Their count was originally 73. But then you
2 have an inmate in RA from special housing.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: So that would bring
5 it down to 72 because this inmate -. This is
6 an outcount. You do an outcount when an inmate
7 is in a different area than where he is housed.
8 Okay.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: And you can't have 73
11 inmates. If 73 is your base, if you've got an
12 inmate from that area on outcount, then that's
13 not a good count.

14 MR. [REDACTED]: Right. So the count. So
15 let's get it right. According to the records,
16 how many inmates should have been at the 12:00
17 p.m. count. How many inmates should have been
18 in the SHU?

19 MR. [REDACTED]: 12:00 a.m.

20 MR. [REDACTED]: 12:00 a.m. Sorry.

21 MS. [REDACTED]: Well that depends
22 because when they initially did this, that's
23 how they was counting the inmates. It wasn't
24 until I started doing that count that I
25 realized that something wasn't right. So

1 that's how we got around to there's an inmate
2 in R&D. You know that's being housed down
3 there on watch. You know. That's how we got to
4 that. So it's like oh, so there's an inmate in
5 R&D. You know. And then you start asking
6 questions. Why is he there? What's the deal
7 with him? Because none of this information was
8 passed down.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: So I've got to ask
11 the staff what's going on.

12 MR. [REDACTED]: I'm going to clarify. I'm
13 going to go back. My question is at midnight,
14 who did the count for the SHU?

15 MS. [REDACTED]: According to this, it
16 says Thomas and Noel.

17 MR. [REDACTED]: Alright. If they did the
18 count and how many people are supposed to do
19 the count?

20 MS. [REDACTED]: Two. At least two.

21 MR. [REDACTED]: Two. If they went through
22 the SHU and they did a head count, right. How
23 many people should they have down?

24 MS. [REDACTED]: They should have
25 gotten 72. But what I'm telling you is when

1 this count was done, they were counting this
2 inmate that was in R&D on that count because no
3 one had told them that the inmate was actually
4 somewhere else. And he was being counted in
5 that area. So they were logging -. So what I
6 understand - and that's how they understood it.
7 That that inmate was being carried on to their
8 count.

9 MR. [REDACTED]: Even though they didn't get
10 eyes on the inmate? Even though they don't
11 know physically. If they physically cannot see
12 the inmate, they're allowed to put it in their
13 count?

14 MS. [REDACTED]: Because the inmate is
15 being ghosted. They could call R&D and ask and
16 say he is the inmate there. Because there was
17 a staff member on the inmate. The problem was
18 not how many inmates they had or what's
19 counted. The problem was the status of this
20 inmate that was in R&D.

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: They didn't' know the
23 status of the inmate in R&D whether he was
24 going to be -. Whether he was staying there
25 altogether or how they were supposed to

1 indicate him on their count slip. They didn't
2 know any of that. That wasn't until they
3 brought this to my attention. And this was the
4 original count slip. There was another count
5 slip that they supposed to have been
6 completing. And place that in the Sally port,
7 but apparently nobody picked it up. So this
8 was the original count slip that was submitted.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: But they were
11 supposed to -. Once we corrected this issue,
12 with the dude in - with the guy in R&D and put
13 him on an outcount. And place him in R&D, then
14 they were supposed to go back, recount. They
15 were supposed to recount and then they was to
16 submit another count slip.

17 MR. [REDACTED]: Okay. That's what I'm
18 getting to.

19 MS. [REDACTED]: Yes.

20 MR. [REDACTED]: So who found out that there
21 was an error with the count? Did they notify
22 you or did you found -?

23 MS. [REDACTED]: Right. Right. When
24 they called. I think we kind of hashed it out
25 together.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: You know because they
3 were saying that they had an inmate that was
4 not on the unit. And they was like well what
5 do we do?

6 MR. [REDACTED]: Okay.

7 MS. [REDACTED]: Because I guess -. I
8 don't know what had happened, but they knew
9 that the guy wasn't on the unit. So they was
10 trying to get it corrected.

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: And of course we
13 started asking questions. Where is this inmate
14 at? What is he doing there? How long he's
15 been there. Dah-dah-dah-dah. But again, this
16 is count time. So you've just got to do the
17 best you can because we've got a count to
18 clear. You know.

19 MR. [REDACTED]: Do you recall. Sorry. You
20 had a question.

21 MR. [REDACTED]: I just want to make sure
22 that we're clear. So did they call in 73
23 without saying this is 73 with a guy that's not
24 actually here. Or did they just call in 73 and
25 someone said how is this 73 if you guys only

1 have 72?

2 MS. [REDACTED]: They called saying
3 that their count was you know that they had the
4 count issue was 73. But they had an inmate
5 that had been removed that had been taken off
6 the unit and was taken to R&D.

7 MR. [REDACTED]: Okay. So they knew that
8 when they called in the count? It wasn't like
9 --

10 MS. [REDACTED]: I mean --

11 MR. [REDACTED]: -- they said --

12 MS. [REDACTED]: -- they weren't
13 calling -.

14 MR. [REDACTED]: -- hey we've got 73 and -
15 -

16 MS. [REDACTED]: No-no-no-no-no.

17 MR. [REDACTED]: -- someone said how do
18 you have 73 for --

19 MS. [REDACTED]: No.

20 MR. [REDACTED]: -- someone that's not
21 there?

22 MS. [REDACTED]: No-no-no-no-no. When
23 they called in the count, they was like I have
24 73 but one of the inmates up here is in R&D.

25 MR. [REDACTED]: So they knew that there

1 was only 72 in SHU at the time. They made note
2 of the fact --

3 MS. [REDACTED]: Right because -.

4 MR. [REDACTED]: -- I'm calling in 73
5 because that's what our numbers are supposed to
6 be, but one guy is not here.

7 MS. [REDACTED]: And they didn't know
8 the status of that inmate.

9 MR. [REDACTED]: Sure.

10 MS. [REDACTED]: They didn't know -.

11 MR. [REDACTED]: So it wasn't like after-
12 the-fact. Like somebody like you're saying -.

13 MS. [REDACTED]: Like I caught them?

14 MR. [REDACTED]: Yeah. Like wait, how are
15 you calling 73 --

16 MS. [REDACTED]: No.

17 MR. [REDACTED]: -- if one guy's not here.

18 MS. [REDACTED]: No. No-no-no-no-no.
19 They -.

20 MR. [REDACTED]: So they brought it to
21 your guys' attention rather than the other way
22 around?

23 MS. [REDACTED]: And I said so how
24 many bodies do you have on the unit? And he
25 said I have 72.

1 MR. [REDACTED]: So that's a good answer.
2 So he - so Thomas is the one who called that
3 count? Rather than Noel?

4 MS. [REDACTED]: I think it was
5 Thomas. I don't think I spoke to Noel about
6 the count.

7 MR. [REDACTED]: So you don't remember
8 specifically though. But you --

9 MS. [REDACTED]: I think it was
10 Thomas.

11 MR. [REDACTED]: -- believe it was Thomas.

12 MS. [REDACTED]: It was a guy.

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: And I said well how
15 many inmates do you have on your unit right
16 now? How many bodies? And he said 72. And I
17 said well let me call because I need to call
18 and make sure that this other body is where
19 it's supposed to be. I need to see this body.
20 I need to make sure somebody -. I need to know
21 what's going on with this body. Is a person
22 sitting on it? Is this guy somewhere in a room
23 by himself?

24 MR. [REDACTED]: Okay. And you
25 specifically recall that?

1 MS. [REDACTED]: I told - and I said
2 go back. Go back around. Do another count.
3 And then send me a new count slip.

4 MR. [REDACTED]: That says 72 versus 73?

5 MS. [REDACTED]: That says 72. Yes.

6 MR. [REDACTED]: So you instructed them to do
7 a recount.

8 MS. [REDACTED]: Right.

9 MR. [REDACTED]: Do you know if they did the
10 recount?

11 MS. [REDACTED]: I don't know if they
12 did a recount because like I said --

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: -- I was in the
15 process. I had to continue with the count. I
16 had to verify and get some information
17 regarding this inmate in R&D. But I have no
18 reason to disbelieve that they didn't do the
19 count.

20 MR. [REDACTED]: Now what if they -? If
21 they already knew there was 72 and one guy,
22 would they be required to actually do a new
23 count? Or just fill out a new count slip?

24 MS. [REDACTED]: I told them to do a
25 new count. Just to make sure.

1 MR. [REDACTED]: So you told them to
2 actually do a new count?

3 MS. [REDACTED]: Yeah. I told them to
4 do a new count.

5 MR. [REDACTED]: And they were
6 instructions you provided to Thomas - or a
7 male. You don't know specifically if it was a
8 males voice?

9 MS. [REDACTED]: Right.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: Right. But yeah, I
12 said, you know, what did you all count. He
13 said we counted 72. And I was like well you
14 know, count again. And then send me - redo
15 your count slip and just send me another count
16 slip. Because I'm going to - while I verify
17 this other information.

18 MR. [REDACTED]: Okay. And the fact that
19 there's only the two people in the SHU - Thomas
20 and Noel - you believe it to have been Thomas.

21 MS. [REDACTED]: Right.

22 MR. [REDACTED]: Okay.

23 MS. [REDACTED]: And to be honest with
24 you, I'm giving myself some time so that I can
25 figure out whether or not -. I want to know

1 whether or not this guy is actually in SHU.

2 MR. [REDACTED]: Sure.

3 MS. [REDACTED]: Or um, in R&D. So
4 I'm like you know just count again and make
5 sure just in case. I'm saying to myself. I'm
6 not saying this to him. I'm thinking to
7 myself, just in case, I called. And there's
8 nobody down there. I wanted to make sure that
9 this is actually the count.

10 MR. [REDACTED]: Sure.

11 MS. [REDACTED]: There.

12 MR. [REDACTED]: And I want to make sure
13 so that something else is clear. When you as a
14 lieutenant are conducting rounds, that you're
15 required once per shift, that's rounds for
16 employees. Not conducting rounds with the COs
17 for inmates. So is your round to go around to
18 your employees to make sure? That's your
19 round? As opposed to participating in a count
20 or a round with the COs conducting of inmates?
21 Do you follow --

22 MS. [REDACTED]: We're not -.

23 MR. [REDACTED]: -- what I'm asking?

24 MS. [REDACTED]: We are not required
25 to go to each individual cell and look at the

1 inmates. When we make rounds, we get with the
2 officers. We make sure that -. I mean if we
3 choose to do that we can. But -.

4 MR. [REDACTED]: But there's no
5 requirement? For your requirement, that one
6 per shift of round. That's to do rounds with
7 your officer - or with your staff - as opposed
8 to conducting a round with them?

9 MS. [REDACTED]: No. There was
10 nothing here said to us or in policy telling us
11 that we needed to go around --

12 MR. [REDACTED]: Sure.

13 MS. [REDACTED]: -- on each housing
14 unit to each individual cell and check on the
15 inmates. If we chose to do that based upon
16 something that we knew wasn't right or
17 something that we had heard or something like
18 that during the course of our shift. Then that
19 - and we felt as though we needed to double
20 check on it. Because our officers are our eyes
21 and ears. And during that time, we didn't'
22 have a whole lot of time. We would spend half
23 of our shift just trying to fill overtime. At
24 that time.

25 MR. [REDACTED]: So are you supposed to

1 though? So if they do a count, are you
2 supposed to do a count with them during your
3 shift?

4 MS. [REDACTED]: I can't remember at
5 that time if we were required to do at least
6 one count because one count per shift is what
7 we're required to do as a lieutenant.

8 MR. [REDACTED]: One count with inmates?

9 MS. [REDACTED]: No. One count in the
10 control center.

11 MR. [REDACTED]: Okay. So you -. You're
12 not putting -. You're never putting your eyes
13 on the inmates doing a count with -. For
14 instance, in this case, if Noel and Thomas are
15 in the SHU, they're doing a 12:00 a.m. count, a
16 3:00 a.m. count, and a 5:00 a.m. count. Are
17 you doing any counts with them?

18 MS. [REDACTED]: No I'm not doing any.

19 MR. [REDACTED]: Okay.

20 MS. [REDACTED]: I'm not - and it
21 wouldn't be for just SHU. It would be for any
22 housing unit.

23 MR. [REDACTED]: Sure.

24 MS. [REDACTED]: Period. But -.

25 MR. [REDACTED]: But for this instance,

1 specifically, I'm talking about the 12:00 a.m.
2 count, a 3:00 a.m. count, and a 5:00 a.m.
3 count. Is there any requirement for any
4 lieutenants that are on that you have oversight
5 over the SHU to do a count with them?

6 MS. [REDACTED]: No.

7 MR. [REDACTED]: No.

8 MS. [REDACTED]: No.

9 MR. [REDACTED]: And there wasn't at that
10 time?

11 MS. [REDACTED]: No.

12 MR. [REDACTED]: And you hadn't done one
13 at that time with them?

14 MS. [REDACTED]: No.

15 MR. [REDACTED]: So your requirements are
16 geared toward staff members not toward inmates?

17 MS. [REDACTED]: Our -.

18 MR. [REDACTED]: Because you're an officer
19 -. You're responsible for the staff. The
20 staff are responsible for the inmates.
21 Correct?

22 MS. [REDACTED]: As a lieutenant, we
23 were required to do one count per shift in the
24 control center. We're required to take one
25 count.

1 MR. [REDACTED]: Sure. And this is the
2 one you did. You did the 12:00 a.m.?

3 MS. [REDACTED]: This is the one count
4 -.

5 MR. [REDACTED]: And this is why you
6 reviewed it and said, I've got the get this
7 thing right.

8 MS. [REDACTED]: Well during the
9 course of taking this count, that came up.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: And of course we had
12 to address it because we can't house the count
13 saying one thing in some area and it's not
14 adding up. I can't have an --

15 MR. [REDACTED]: So are they --

16 MS. [REDACTED]: -- inmate -.

17 MR. [REDACTED]: -- calling you that day
18 then. So Thomas is calling you and providing
19 your count and that's the count that you did?

20 MS. [REDACTED]: That's the -. I was
21 taking this count -.

22 MR. [REDACTED]: So he didn't call control
23 - or he called control, but you were the person
24 he spoke with.

25 MS. [REDACTED]: Right.

1 MR. [REDACTED]: Gotcha.

2 MS. [REDACTED]: Right. Right.

3 MR. [REDACTED]: Do you recall that night, did
4 you participate in the 10:00 p.m. count?

5 MS. [REDACTED]: Did I do what?

6 MR. [REDACTED]: Did you participate - were
7 you there when the 10:00 p.m. count happened?

8 MS. [REDACTED]: No. Hm-mm.

9 MR. [REDACTED]: So you came on shift after?

10 MS. [REDACTED]: I don't know if, I
11 probably was here during --

12 MR. [REDACTED]: But not participating.

13 MS. [REDACTED]: -- the 10:00 p.m.
14 count. Yeah. But I didn't take the 10:00 p.m.
15 count.

16 MR. [REDACTED]: Question. Do you know when
17 that inmate was removed to R&D? What time?

18 MS. [REDACTED]: I have no idea. I
19 have no idea. That was done prior to me
20 getting there.

21 MR. [REDACTED]: Now let's say the inmate was
22 removed prior to the 10:00 p.m. count. Would
23 the 10:00 p.m. count have been wrong? If they
24 reported?

25 MS. [REDACTED]: I have no - I can't

1 answer that. I don't know.

2 MR. [REDACTED]: No-no. But you fixed it.
3 They called you, they asked for the -. Let me
4 show you the 10 - two more documents. Let's do
5 -. Take a look at this document. What is
6 that?

7 MS. [REDACTED]: This is the E-1 for
8 August 9, 2019 at 9:33.

9 MS. [REDACTED]: Okay. And what's the
10 count for the SHU at that point?

11 MS. [REDACTED]: It's 73.

12 MR. [REDACTED]: 73?

13 MS. [REDACTED]: Mm-hmm.

14 MR. [REDACTED]: And what's the count for RA?
15 RA being the R&D?

16 MS. [REDACTED]: It's saying zero.

17 MR. [REDACTED]: Okay. If the inmate was
18 moved prior to this count, to R&D, would
19 technically the count for the SHU have been
20 wrong?

21 MS. [REDACTED]: That depends on what
22 the officers were told because like I said, RA
23 is not a housing unit. So no officer would
24 have been moving an inmate to RA on their own.
25 Something -.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: There had to have
3 been some guidance that - whereby they was told
4 because this inmate was there all night with a
5 watch on him.

6 MR. [REDACTED]: Which inmate? The one in
7 R&D?

8 MS. [REDACTED]: The inmate that was
9 taken to --

10 MR. [REDACTED]: R&D?

11 MS. [REDACTED]: R&D. Yes. The
12 inmate had a watch. There was a staff member
13 on the inmate. You can't --

14 MR. [REDACTED]: What was the watch for?

15 MS. [REDACTED]: -- just put an inmate
16 in R&D and just leave him there. There's
17 nobody to watch him. R&D staff leaves at
18 10:00. So you can't just leave an inmate there
19 with nobody watching him.

20 MR. [REDACTED]: So -. Maybe I'm saying this
21 wrong. I'm just trying to get clarification.
22 When you do - when a CO does a count - can they
23 account - but in their count - can they account
24 for an inmate that they do not get their eyes
25 on?

1 MS. [REDACTED]: Depending on who gave
2 them the instruction as to how that inmate was
3 going to be accounted for.

4 MR. [REDACTED]: What about?

5 MS. [REDACTED]: If that - say - if
6 that. If that inmate was in R&D at the 10:00
7 count, depending on how they were guided
8 because I mean they know that an inmate can't
9 be in R&D by himself either. So depending on
10 how that inmate was being counted, they may
11 have been given instructions by somebody to
12 ghost him. And count him in SHU. I don't
13 know. I can't explain that.

14 MR. [REDACTED]: So COs have the ability, it's
15 not per policy, COs have the ability to do
16 that?

17 MR. [REDACTED]: To do what?

18 MR. [REDACTED]: If they don't have eyes on,
19 if they can get instructions from another
20 person saying no, report it as your count?

21 MS. [REDACTED]: That would have to be
22 someone in their chain of command that would
23 advise them to do that.

24 MR. [REDACTED]: Who? Do you know?

25 MS. [REDACTED]: It would be someone

1 over the lieutenant's head because no
2 lieutenant is going to - that I knew at the
3 time - that I worked with at the time - would
4 have an inmate in a different area knowing that
5 that inmate was not going to be coming back to
6 that housing unit.

7 MR. [REDACTED]: So the key right now is we
8 don't know when the inmate was moved. Right?

9 MS. [REDACTED]: I don't know when. I
10 can't tell you when the inmate was moved. That
11 happened before I got there. What specific
12 time he was moved, I don't know.

13 MR. [REDACTED]: Let's say the inmate was
14 moved and they didn't get the authorization
15 from the captain. Would the count have been
16 wrong?

17 MS. [REDACTED]: I don't -. You know
18 as far as I know, it could have been someone
19 above the captain. I don't know. I can't
20 provide you with an adequate answer because --

21 MR. [REDACTED]: No problem.

22 MS. [REDACTED]: -- I don't -.

23 MR. [REDACTED]: We're going to go past that.

24 MS. [REDACTED]: Okay.

25 MR. [REDACTED]: So I'm going to show you.

1 This is just for clarification purposes, just
2 for our records. I'm going to show you one
3 more document. What is F?

4 MS. [REDACTED]: This is an E-1 for
5 August 9, 2019. The time is 1541.

6 MR. [REDACTED]: Okay. And that should be the
7 4:00 p.m. count?

8 MS. [REDACTED]: Yes. This would have
9 been for the 4:00 count.

10 MR. [REDACTED]: What is the lineup on top?
11 It says A-T-T-Y. What is that?

12 MS. [REDACTED]: What?

13 MR. [REDACTED]: Up here. Up here it says A-
14 T-T-Y.

15 MS. [REDACTED]: Oh, that's attorney
16 conference.

17 MR. [REDACTED]: Okay. And what is outcount?
18 On - towards the right. Over here.

19 MS. [REDACTED]: Well....

20 MR. [REDACTED]: This one right here.

21 MS. [REDACTED]: The outcount is the -
22 . This is for that section that you're
23 pointing to. That would be the number of
24 inmates that are not in their respective
25 housing units from these areas - the different

1 areas that are designated here.

2 MR. [REDACTED]: Is it possibly because
3 they're leaving?

4 MS. [REDACTED]: From the different
5 housing -. I have -. It could be a number of
6 things.

7 MR. [REDACTED]: Okay. At 4:00 p.m. what was
8 the count in the SHU?

9 MS. [REDACTED]: Um, 75.

10 MR. [REDACTED]: 75?

11 MS. [REDACTED]: Yes.

12 MR. [REDACTED]: Okay. And what is the count
13 for RA?

14 MS. [REDACTED]: Zero.

15 MR. [REDACTED]: Okay. So that's R&D.
16 There's nobody there. Where is - according to
17 that if you flip through it. Where is Epstein
18 at that point?

19 MS. [REDACTED]: It looks like he's in
20 attorney conference.

21 MR. [REDACTED]: Okay. No problem. We're
22 going to keep going.

23 MS. [REDACTED]: Okay.

24 MR. [REDACTED]: Um.... On August 10th.
25 Right. When did you go to the SHU?

1 MS. [REDACTED]: Like I said earlier,
2 I think it was -.

3 MR. [REDACTED]: Can you do me a favor? Can
4 you sign it and date it just like before?

5 MR. [REDACTED]: Initial and date on the
6 top.

7 MR. [REDACTED]: Initial.

8 MS. [REDACTED]: Which one?

9 MR. [REDACTED]: All of them.

10 MR. [REDACTED]: Oh. Since I showed you.

11 MS. [REDACTED]: Okay.

12 MR. [REDACTED]: I'll take that. When did you
13 -? Did you make a round into the SHU on August
14 10th?

15 MS. [REDACTED]: Yes.

16 MR. [REDACTED]: What time?

17 MS. [REDACTED]: I don't remember what
18 time. It was like halfway between my shift
19 later on in the morning.

20 MR. [REDACTED]: Did you speak to -?

21 MS. [REDACTED]: Probably about 4:--
22 something. Between 4:00 and 5:00 I guess.

23 MR. [REDACTED]: Do you recall who the COs
24 were on duty?

25 MS. [REDACTED]: Yes. Thomas and

1 Noel.

2 MR. [REDACTED]: Okay. Did you speak to them?

3 MS. [REDACTED]: Yes.

4 MR. [REDACTED]: Okay. And everything was
5 good? Did they say have any complaints or
6 anything like that?

7 MS. [REDACTED]: No. They were fine.

8 MR. [REDACTED]: Do you recall your
9 conversation at all?

10 MS. [REDACTED]: I don't recall my
11 conversation with them, but I spoke to them for
12 a minute because I stopped there. I went up to
13 10 South and I made my rounds up there. And I
14 came back and I spoke with them again before I
15 left.

16 MR. [REDACTED]: So you spoke with them
17 twice?

18 MS. [REDACTED]: Yeah. I spoke with
19 them initially. And I told them you know when
20 I get back out -. I'm going to run up to 10
21 South and make my rounds and sign my books and
22 stuff up there. And then I'll get back with
23 you guys. I'll come back on my way down.
24 Because I needed to sign their round sheets.

25 MR. [REDACTED]: Okay.

1 MR. [REDACTED]: Now you mentioned that you
2 don't know - you never heard of the requirement
3 for Epstein needing a cellmate. Right?

4 MS. [REDACTED]: Right.

5 MR. [REDACTED]: So you didn't know.
6 According to what you said before, you didn't
7 even know the COs knew that requirement.

8 MS. [REDACTED]: If I didn't know, I
9 know they didn't know. And according to that
10 because I don't even see -. Where is that
11 email? Because I want to see who did they
12 actually send that to. If it says on the email
13 who they sent that to.

14 MR. [REDACTED]: It looks like they sent
15 it up to all the officers, lieutenants and.

16 MS. [REDACTED]: This says suicide
17 watch/psych observation update.

18 MR. [REDACTED]: So on or around July
19 30th, Epstein came off of the suicide
20 observation and was placed back into the SHU.
21 And this was supposed to be the email saying
22 that he was required to have a cellmate while
23 he was in the SHU.

24 MS. [REDACTED]: Yeah, but this isn't
25 MYM all.

1 MR. [REDACTED]: Right. So you said you
2 think it should have gone to all staff.

3 MS. [REDACTED]: Yeah-yeah.

4 MR. [REDACTED]: So I guess what I'm -.

5 MS. [REDACTED]: This is only
6 addressed to suicide - whoever is in that
7 group. It looks like a group that they made
8 up. Because I never heard of that group
9 before. Suicide watch/psych -.

10 MR. [REDACTED]: You never got the email from
11 them?

12 MR. [REDACTED]: Sure. So -.

13 MS. [REDACTED]: Slash psych
14 observation update. I guess that's a group.

15 MR. [REDACTED]: So these are the -. So
16 the one - pages one through three. These are
17 the people that they I guess placed in that --

18 MS. [REDACTED]: That they placed in
19 that group.

20 MR. [REDACTED]: -- group. And it looks
21 like it's all the lieutenants and the officers
22 in the institution as opposed to the COs
23 themselves.

24 MS. [REDACTED]: You mean specific
25 officers? Specific staff? Because I can

1 assure you that's not all of them.

2 MR. [REDACTED]: That's not all of them.

3 Yeah. So I don't know how they actually chose
4 it. But you said you know you were on it but
5 you don't recall receiving it.

6 MS. [REDACTED]: I do not recall
7 receiving that.

8 MR. [REDACTED]: Now do you know -? I
9 don't know how it works here. I mean are you
10 in front of your computer? Do you read your
11 emails? How is that?

12 MS. [REDACTED]: During that time, I
13 will be honest with you. I didn't have time to
14 read any emails because in addition to not
15 having a lot of staff, we had a bunch of
16 incidents that were going on during that time
17 as well.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: A bunch of body
20 alarms and stuff like that that was going on.
21 And because of the fact that we were so short-
22 handed, you didn't have time to read emails and
23 stuff at the time. You just had too much to do
24 with the time in your shift. It was just way
25 too much.

1 MR. [REDACTED]: Sure.

2 MS. [REDACTED]: It was way too much.

3 MR. [REDACTED]: So although this was sent
4 to you, you don't think you probably even
5 clicked on it?

6 MS. [REDACTED]: I got a lot of emails
7 during that time that I can assure you I didn't
8 read.

9 MR. [REDACTED]: Sure. Alright. So you
10 were unaware. How does it work -? Just can
11 you walk me through specifically on, you know,
12 if [REDACTED] the cellie. Did you know that Epstein
13 had a cellmate?

14 MS. [REDACTED]: I didn't know Epstein
15 had a cellmate.

16 MR. [REDACTED]: So you didn't even know
17 he had a cellmate at all?

18 MS. [REDACTED]: I didn't know if he
19 had a cellmate or not.

20 MR. [REDACTED]: Okay.

21 MS. [REDACTED]: When all of this
22 happened, it, of course, later came out that he
23 had a cellmate and the inmate was removed. But
24 as far as me having personal knowledge of
25 whether or not he had a cellmate, I didn't know

1 if he had a cellmate or not. I assumed he had
2 a cellmate.

3 MR. [REDACTED]: Now being that you know
4 they sent this email. You said who should have
5 advised you at least at some point, hey he
6 needs a cellmate. Where was the communication
7 breakdown there?

8 MS. [REDACTED]: It wasn't just me.
9 It should have been everybody.

10 MR. [REDACTED]: Sure. So what my question
11 is though, who is responsible for that?

12 MS. [REDACTED]: The - you would think
13 that psychology would have called us or
14 somebody should have been making sure.

15 MR. [REDACTED]: Okay. So let's go
16 through that. From psychology, who should -
17 who dropped the ball here?

18 MS. [REDACTED]: Well I'm not going to
19 say anybody dropped the ball because it's all
20 about responsibilities to -.

21 MR. [REDACTED]: But somebody - psychology
22 I guess made the note. So is it the person
23 that's on the email, this [REDACTED] [REDACTED]?
24 Should have she gone around and aside from
25 sending this email should have she spoken to

1 people or had a meeting? What should have
2 happened?

3 MS. [REDACTED]: I mean if that's what
4 she -. I just feel as though they that - to
5 communicate -. Like I said originally. My
6 whole thing was Epstein should have been placed
7 on 10 South to begin with because he was that
8 type of inmate that checked all the boxes for -
9 -

10 MR. [REDACTED]: Sure.

11 MS. [REDACTED]: -- someone that
12 should have been placed on 10 South.

13 MR. [REDACTED]: And that's going to be
14 one of my follow-up questions is what the
15 difference between the SHU and 10 South. But
16 specifically to this, like what should have
17 psychology done differently?

18 MS. [REDACTED]: I would have made
19 sure - I just would have -. I just would have
20 made sure that everybody -. I never even would
21 have sent Epstein back to -. I would have
22 never even put him back in that position again.

23 MR. [REDACTED]: So if he had -.

24 MS. [REDACTED]: If he had a cellmate
25 because even saying that he had a cellmate.

1 Even telling somebody that he should have had a
2 cellmate. Still wouldn't have prevented him
3 from trying to harm himself. We had just went
4 through that.

5 MR. [REDACTED]: Sure.

6 MS. [REDACTED]: We - that was a
7 scenario when they got him. That got to the
8 memo being done.

9 MR. [REDACTED]: Okay. So -.

10 MS. [REDACTED]: You know? He had a
11 cellmate then.

12 MR. [REDACTED]: The other lieutenants
13 though in this case, they knew that he was
14 required to have a cellmate. Correct?
15 According to --

16 MR. [REDACTED]: Yes.

17 MR. [REDACTED]: -- there? So it sounds -
18 . From reviewing the other interviews, it
19 looks like you were the one that didn't know.
20 Everyone else knew. Do you know why that would
21 have been? Who should have made sure you knew
22 that he needed a cellmate?

23 MS. [REDACTED]: I would think whoever
24 knew that he needed an inmate.

25 MR. [REDACTED]: So that's what I'm

1 saying. Everyone else know. So like all the
2 other lieutenants and the captain. They all
3 said that they were aware that he was required
4 to have a cellmate. So the question -. So I
5 don't know if they got the information from the
6 email, if there was an all-hands. Who should
7 have made sure that you knew that he had a
8 cellmate?

9 MS. [REDACTED]: Okay. So if they
10 knew that. If everybody is saying that they
11 knew he should have had a cellmate, then why
12 didn't he have one?

13 MR. [REDACTED]: That's the -.

14 MS. [REDACTED]: How did we get to
15 that?

16 MR. [REDACTED]: That's the reason why
17 we're talking with you. That is the big issue
18 of why didn't he have one? Who? Where was the
19 communication breakdown?

20 MS. [REDACTED]: I don't know.

21 MR. [REDACTED]: So should have the
22 captain told you that? Should have the person
23 who relieved you that day? Should have that
24 person told you? Hey just so you know, Epstein
25 doesn't have a cellmate.

1 MS. [REDACTED]: It would have been
2 nice to have, when I got relieved for someone
3 to have said yeah, by the way, we got this
4 email saying that we were notified the Epstein
5 now requires to have a cellmate. Yeah. That
6 would have been real helpful.

7 MR. [REDACTED]: So looking at the Friday,
8 August 9th. Was it -? It looks like [REDACTED].
9 Was that the person who relieved you? As the
10 ops lieutenant? It looks like he was the ops
11 lieutenant.

12 MS. [REDACTED]: You relieved him.

13 MS. [REDACTED]: Yeah. I would have -
14 .

15 MR. [REDACTED]: No. She relieved him.
16 It was August 9th.

17 MS. [REDACTED]: Yeah. That would
18 have been who I would have relieved.

19 MR. [REDACTED]: Or he would have relieved
20 you. Correct? Because that's August 9th. You
21 started August 10th at 12:00 a.m. So let's see
22 how it shows here.

23 MS. [REDACTED]: I would have relieved
24 [REDACTED] because [REDACTED] was evening watch.

25 MR. [REDACTED]: But this was August 9th.

1 And you started August 10th, 12:00 a.m.

2 MS. [REDACTED]: Right. So that would
3 have been evening watch of -.

4 MR. [REDACTED]: You would have relieved
5 him. Correct.

6 MS. [REDACTED]: Right. I would have
7 relieved him.

8 MR. [REDACTED]: And so should have he
9 told you?

10 MS. [REDACTED]: I would - I mean -.

11 MR. [REDACTED]: How would then -? Or
12 should have -? [REDACTED] would have been gone.
13 So I'm assuming he would have been the one?

14 MS. [REDACTED]: Let me tell you
15 something. In the real world in a real
16 institution that was running in the manner in
17 which it should.

18 MR. [REDACTED]: Sure.

19 MS. [REDACTED]: Sure. That would
20 have --

21 MR. [REDACTED]: And you're not saying --

22 MS. [REDACTED]: -- occurred.

23 MR. [REDACTED]: -- that he did anything
24 wrong.

25 MS. [REDACTED]: And I'm not -.

1 MR. [REDACTED]: Let's get this place up
2 to running as best as possible.

3 MS. [REDACTED]: No. Let me -.

4 MR. [REDACTED]: Where should have this
5 communication occurred?

6 MS. [REDACTED]: Let's make something
7 clear right now.

8 MR. [REDACTED]: Yeah.

9 MS. [REDACTED]: I'm not here to cover
10 for anybody.

11 MR. [REDACTED]: Yeah-yeah-yeah.

12 MS. [REDACTED]: I'm not here to make
13 excuses for anybody or any of that.

14 MR. [REDACTED]: Right.

15 MS. [REDACTED]: What I'm trying to
16 get over to you is that at that particular time
17 when - even before -.

18 MR. [REDACTED]: Mm-hmm.

19 MS. [REDACTED]: Um....this incident
20 happened with Epstein. Even before the
21 suicide. We were so busy with a number of
22 different things.

23 MR. [REDACTED]: Sure.

24 MS. [REDACTED]: We were here when we
25 were finding shanks every - an unusual amount

1 of shanks, cell phones, drugs. Inmates were
2 going out of their mind on drugs and all this
3 other stuff. We had inmates fighting, inmates
4 getting stabbed, inmates getting slashed.
5 There were -. In addition to everything else
6 that we had to take care of. We were doing
7 uses of forces. We didn't' have adequate staff
8 to even do a use of force or even to respond to
9 a body alarm a lot of times. There were
10 incidents where we as lieutenants were the only
11 people here and had to do things. So -.

12 MR. [REDACTED]: So there's just
13 overwhelming -. You guys were just completely
14 overwhelmed. In the weeds.

15 MS. [REDACTED]: We -. At that time,
16 there was just so much going on.

17 MR. [REDACTED]: Right.

18 MS. [REDACTED]: You would be hell-
19 bent to stay abreast of every little thing that
20 was going on. You just -. When your relief
21 came, you know, you was like let me get some
22 fresh air.

23 MR. [REDACTED]: Just let me -. In this
24 circumstance. We're going to try to reign it
25 in specifically to -.

1 MS. [REDACTED]: If everything was
2 going fine --

3 MR. [REDACTED]: So how -.

4 MS. [REDACTED]: -- and on a good day.
5 Yes.

6 MR. [REDACTED]: Say he was - [REDACTED] -
7 Epstein's inmate was released you know sometime
8 between 8:00 and 2:00. So I'm assuming the way
9 it should have worked is the CO should have
10 notified a lieutenant. The lieutenant maybe
11 should have notified the ops lieutenant. The
12 ops lieutenant should have notified the
13 captain. Is that the way it should have worked
14 in a perfect world?

15 MS. [REDACTED]: It depends on who is
16 here.

17 MR. [REDACTED]: But should -. So --

18 MS. [REDACTED]: I'm saying that's --

19 MR. [REDACTED]: -- that's why we're
20 looking at the 9th.

21 MS. [REDACTED]: -- what I would have
22 done.

23 MR. [REDACTED]: Right.

24 MS. [REDACTED]: I can't tell you what
25 somebody --

1 MR. [REDACTED]: Because - but would that
2 --
3 MS. [REDACTED]: -- else would have
4 done.
5 MR. [REDACTED]: -- be standard operating
6 procedure? That's the way it works?
7 MS. [REDACTED]: That's not standing.
8 That's just what I would have done.
9 MR. [REDACTED]: Okay.
10 MS. [REDACTED]: Just to make sure
11 that -.
12 MR. [REDACTED]: So let's say -.
13 MS. [REDACTED]: Just to answer the
14 questions that I would have had regarding that.
15 MR. [REDACTED]: So -.
16 MS. [REDACTED]: I can't explain -. I
17 can't tell you what somebody else would have
18 done.
19 MR. [REDACTED]: So let's say --
20 MS. [REDACTED]: Or should have done.
21 MR. [REDACTED]: -- [REDACTED] for instance.
22 He was on the looks like 8:00 to 2:00 p.m.
23 Let's say he knew that [REDACTED] was gone and
24 Epstein was required to have a cellmate. What
25 should have he done? Should have he notified

1 [REDACTED] and should have he notified [REDACTED]?

2 MS. [REDACTED]: [REDACTED] used to -. If
3 he wasn't at that time, [REDACTED] used to be the
4 SHU lieutenant. So [REDACTED] probably would have
5 told them put somebody else in the cell with
6 him.

7 MR. [REDACTED]: Okay.

8 MS. [REDACTED]: You know?

9 MR. [REDACTED]: So you think he would
10 have just taken immediate action?

11 MS. [REDACTED]: I think he probably
12 would have said just put somebody in the cell
13 with him and called [REDACTED] and say hey this
14 dude don't have a cellie. I took care of it or
15 whatever.

16 MR. [REDACTED]: Now what about if --

17 MS. [REDACTED]: Or maybe he -.

18 MR. [REDACTED]: -- the executive staff
19 wants to have a hand in picking and choosing
20 who it is that Epstein is assigned to because
21 of his high-profile status? Should have [REDACTED]
22 still done that temporarily? Or should have
23 [REDACTED] just notified [REDACTED]?

24 MS. [REDACTED]: That is - that wasn't
25 written in stone.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: That is something
3 that I would have done.

4 MR. [REDACTED]: You would have done what?

5 MS. [REDACTED]: I would - that's
6 something that I would have done.

7 MR. [REDACTED]: What, temporarily?

8 MS. [REDACTED]: I'm not saying that
9 that's across the board that every operations
10 lieutenant that was here that day and was that
11 found themselves in that position. I'm not
12 going to say that's what -. There's no
13 standard procedure for that situation because
14 that's out of the ordinary. First of all, if
15 we're going to go by what should have been
16 done, Epstein should have been on 10 South.
17 That's what should have been done.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: Period.

20 MR. [REDACTED]: And what -?

21 MS. [REDACTED]: Now everything when -
22 .

23 MR. [REDACTED]: So you keep on going back
24 to 10 South.

25 MS. [REDACTED]: Right because --

1 MR. [REDACTED]: What the difference
2 between --

3 MS. [REDACTED]: -- that's how --

4 MR. [REDACTED]: -- 10 South -?

5 MS. [REDACTED]: -- important it is.

6 MR. [REDACTED]: So what's the difference
7 between 10 South and the SHU?

8 MS. [REDACTED]: The difference
9 between SHU is that SHU is for general
10 population inmates.

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: You know. You're not
13 guaranteed to have a cellie there. You know.
14 So you may have a cellie and you may not.
15 Epstein was a high-profile inmate. All high-
16 profile inmates they usually assign to 10
17 South. Epstein had just -. Even before he
18 committed suicide. Everybody knew and that's
19 not just here. That's people in the region.
20 You know all the way up to Donald Trump knew
21 Epstein was here. You know. And when you look
22 at Donald Trump all the way down the line, you
23 know, to the regional director, the
24 correctional services administrator. All those
25 people should have been involved in where

1 Epstein was placed when he got here. Now that
2 you know because they failed to do their job,
3 you know, and place him on 9 South where he
4 never should have been to begin with.

5 MR. [REDACTED]: Nine South or 10? Oh
6 they put him in 9 South.

7 MS. [REDACTED]: 9 South.

8 MR. [REDACTED]: Okay.

9 MS. [REDACTED]: They placed him in
10 regular old SHU.

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: For inmates that
13 faced disciplinary action. Inmates that are
14 being separated from other inmates on
15 protective custody. Those to - things of that
16 nature.

17 MR. [REDACTED]: So -.

18 MS. [REDACTED]: If he -.

19 MR. [REDACTED]: In 10 South, do inmates
20 all have cellmates in 10 South?

21 MS. [REDACTED]: Inmates on 10 South
22 don't have cellmates. But.

23 MR. [REDACTED]: Okay.

24 MS. [REDACTED]: What they do have up
25 there -. And I'm telling you he should have

1 been put up there from day one. Most
2 especially after he attempted suicide. So if
3 you didn't place him up there from day one.
4 When he attempted suicide with a cellmate.
5 Okay? Let's not forget that because when he
6 attempted suicide, he had a cellmate.

7 MR. [REDACTED]: Yeah but isn't the reason
8 why he didn't - wasn't successful partly
9 because of the cellmate? My understanding was
10 because once you're - once you commit suicide,
11 you want another person to try to prevent it
12 from actually a suicide being successful. So
13 if they want someone in there to basically
14 watch him, wouldn't they want him in the SHU
15 versus 10 South?

16 MS. [REDACTED]: You're not guaranteed
17 that -.

18 MR. [REDACTED]: You're not guaranteed but
19 I think that the purpose of him being required
20 a cellmate was that they want someone in there.
21 And that's why they wanted him vetted. Because
22 the purpose was so that someone could be
23 watching him partly. If he's trying to hang
24 himself, there's obviously going to be another
25 cellmate in there saying what are you going?

1 MS. [REDACTED]: First of all, an
2 inmate don't owe you nothing.

3 MR. [REDACTED]: Sure.

4 MS. [REDACTED]: Another inmate don't
5 owe you anything. And another inmate by policy
6 is not to be supervising another inmate. So by
7 you saying - because I don't even agree with
8 inmate companions.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: I've known a lot of
11 inmate companions who would antagonize the
12 person on watch just so they hang their damn
13 selves. Okay?

14 MR. [REDACTED]: Okay.

15 MS. [REDACTED]: So for you to sit
16 here and put somebody who you know is as high-
17 profile and as important as everybody made
18 Epstein out to be at that time, you relied on a
19 random inmate to keep him safe. I mean, that's
20 -. You're fooling yourself.

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: You're fooling
23 yourself.

24 MR. [REDACTED]: Okay. So just for your
25 own personal opinion was that he should have

1 been on 10 South and he shouldn't have had an
2 inmate at all. He should have just had closer
3 eyes on by staff members?

4 MS. [REDACTED]: That's not my
5 personal opinion. That's my professional
6 opinion.

7 MR. [REDACTED]: Right.

8 MS. [REDACTED]: Because I've worked
9 in this environment --

10 MR. [REDACTED]: Sure.

11 MS. [REDACTED]: -- long enough to
12 know --

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: -- that if somebody
15 said important to you --

16 MR. [REDACTED]: Where psychology -.

17 MS. [REDACTED]: -- and you wanted to
18 keep them safe, and for the type of inmate that
19 he was, that was the best environment for him.
20 They have cameras up there in every cell. And
21 they have a staff member -.

22 MR. [REDACTED]: There's cameras in the
23 cell themselves?

24 MS. [REDACTED]: There's cameras in
25 each individual cell. And there is - the

1 officers have monitors right by their desk.

2 MR. [REDACTED]: Okay.

3 MS. [REDACTED]: So.

4 MR. [REDACTED]: So if they would have had
5 eyes on at all times.

6 MS. [REDACTED]: They would have had
7 eyes on him at all times.

8 MR. [REDACTED]: Awesome. Okay. So
9 alright. I just wanted to get -.

10 MS. [REDACTED]: And I mean -.

11 MR. [REDACTED]: I really wanted to find
12 out though, in this specific circumstance, who
13 should have told you? That's the main
14 question.

15 MS. [REDACTED]: I mean a lot of
16 people.

17 MR. [REDACTED]: Who should have informed
18 you.

19 MS. [REDACTED]: A lot of people could
20 have told me.

21 MR. [REDACTED]: Right.

22 MS. [REDACTED]: A lot of people could
23 have told me.

24 MR. [REDACTED]: And you didn't have any
25 conversations with anyone about that

1 requirement? Because again, it seems like
2 everybody else knew. You didn't. So I'm just
3 trying to figure out where that communication
4 breakdown -.

5 MS. [REDACTED]: I don't know where it
6 --

7 MR. [REDACTED]: - occurred.

8 MS. [REDACTED]: -- occurred.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: To be honest with
11 you.

12 MR. [REDACTED]: Okay. Would have it been
13 the captain is responsible for that? Or is it
14 in this instance, since you said you didn't
15 know at all, should have [REDACTED] told [REDACTED],
16 [REDACTED] told you?

17 MS. [REDACTED]: I don't -. Look.
18 Look. I'm not going to sit here and tell you
19 what somebody could have, should have, would
20 have done. Because like I said, there was a
21 lot of things going on at this institution. If
22 we're going to say "shoul-da-woul-da-coul-da,"
23 then we should have had adequate staffing.

24 MR. [REDACTED]: Yep.

25 MS. [REDACTED]: We shouldn't have had

1 staff here that were dead on their feet.

2 MR. [REDACTED]: Sure.

3 MS. [REDACTED]: You know. Trying to
4 watch an inmate. And when all those
5 circumstances that was going on, there was a
6 lot of things that we should have been doing
7 that wasn't done. So it's not just about what
8 happened to Epstein. It's about everything
9 else surrounding his death that occurred that
10 didn't happen.

11 MR. [REDACTED]: That's one point.

12 MS. [REDACTED]: That should have been
13 occurring that didn't happen.

14 MR. [REDACTED]: Okay. Now let's - I'm going
15 to take it out. Let's say you're on shift.
16 Inmate attempted to commit suicide. You know
17 there's an issue with the inmate. You're
18 leaving the shift. Do you have a conversation
19 with the person you're relieving - I mean
20 whoever's relieving you? Do you have a
21 conversation with that person and advise them
22 what happened during your shift?

23 MS. [REDACTED]: Yes. I would -.

24 MR. [REDACTED]: Why? Why would you do it?
25 Just to, what reason -.

1 MS. [REDACTED]: Because look. Let me
2 explain something to you.

3 MR. [REDACTED]: No-no-no. I just need an
4 explanation.

5 MS. [REDACTED]: No-no-no. I'm going
6 to give you an explanation. But I'm going to
7 give you the explanation that best suits the
8 question that you're --

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: -- asking me. When
11 we do these pass downs, everybody is different.
12 Some people tell you verbatim everything that
13 happened. Some people don't. That's just the
14 nature of the beast. You know. I could sit
15 here all day and say somebody should have told
16 me something. Or you know if they had the
17 information. But when you've got so many
18 things on your mind and you've dealt with so
19 many things during the course of the day, you
20 know, people don't want to continue to stand
21 there and do it. People forget. I mean they
22 could have been standing there talking to me
23 for five minutes with all the things that go on
24 during the course of the day. You know.
25 That's not just here. That's every place I've

1 been when it comes to pass down. Some people
2 will tell you a bunch of stuff depending on
3 when it happened during the course of the day
4 and whatever else came behind it or came before
5 it. People they --

6 MR. [REDACTED]: No, I understand that. No-
7 no. I just -.

8 MS. [REDACTED]: -- don't always
9 remember.

10 MR. [REDACTED]: I get that. But let's just
11 say as Agent [REDACTED] already mentioned. If
12 there was instructions form the captain down
13 and the lieutenant. Let's say Lieutenant [REDACTED]
14 was aware of the instructions, and was clear
15 instructions that Epstein had to have a
16 cellmate. And he knew that the cellmate was
17 removed. What was -. Let's just say in a
18 perfect world. What was his role? When he
19 left the shift. What should he have done?

20 MS. [REDACTED]: [REDACTED] would have -.

21 MR. [REDACTED]: No-no-no. It's not "would
22 have." What should he have done?

23 MS. [REDACTED]: They would have
24 already had -. If you're telling me that this
25 inmate left at what time?

1 MR. [REDACTED]: Well he left the cell at
2 8:30 and by 1:30 he was gone from the
3 institution.

4 MS. [REDACTED]: Okay. So by the time
5 I got here at 10:00 at night, he should have
6 already had. That should have already been
7 taken care of.

8 MR. [REDACTED]: Okay. And that's what
9 we're asking. Who should have taken care of
10 it?

11 MS. [REDACTED]: The first person to
12 have known that he didn't have a cellie.

13 MR. [REDACTED]: So if [REDACTED] was that
14 person, should have he, what should have he
15 done? [REDACTED] doesn't work for the BOP anymore.
16 So we're just asking what should have happened?

17 MS. [REDACTED]: It doesn't matter
18 even if he was still --

19 MR. [REDACTED]: I know. I just --.

20 MS. [REDACTED]: -- working for the
21 Bureau. I mean. If someone knew for a fact
22 that he was supposed to have had a cellie. And
23 they received some type of information or they
24 came aware of the fact that he didn't. And
25 that inmate was never coming back. Depending

1 on that, they should have questioned to see
2 what was the circumstances surrounding that.
3 When they determine what the circumstances were
4 based upon the fact that if he was coming back
5 or whether or not he wasn't coming back, then
6 they should have made arrangements for him to
7 get another cellie.

8 MR. [REDACTED]: Okay. I'm done. Can I see
9 the roster one more time?

10 MR. [REDACTED]: Yeah. And then let's
11 stay specific to your instance, so we don't
12 have to ask you like what should have they
13 done? So as far as yours. If you - and again
14 you weren't. But if you were aware that he was
15 required to have a cellmate. Was there any
16 action that you should have or could have taken
17 between the hours that you were working?

18 MS. [REDACTED]: If I -.

19 MR. [REDACTED]: Could cell mates have
20 been reassigned at that time of night?

21 MS. [REDACTED]: Morning watch is not
22 the time to be moving inmates around because it
23 presents too much of a safety issue.

24 MR. [REDACTED]: Sure.

25 MS. [REDACTED]: And being that, if we

1 don't have adequate staffing, then -. Morning
2 watch, period. You're not even supposed to be
3 opening doors on morning watch.

4 MR. [REDACTED]: So that's my question.
5 If [REDACTED] had told you, which obviously he
6 didn't. Correct?

7 MS. [REDACTED]: Correct.

8 MR. [REDACTED]: If he had, could have you
9 even taken action?

10 MS. [REDACTED]: I would have
11 contacted -. Like I said. I would have called
12 [REDACTED] or psychology or somebody.

13 MR. [REDACTED]: So even at that time of
14 night?

15 MS. [REDACTED]: Even at that - yes.
16 Even at that time of the night.

17 MR. [REDACTED]: Okay.

18 MS. [REDACTED]: To figure out what's
19 going on with -. I mean I can't justify just
20 leaving him up there without a cellie if he's
21 supposed to have one. How am I going to
22 justify that? And that's not even something
23 that I would even risk.

24 MR. [REDACTED]: What about the COs? If
25 the COs knew - so Noel and Thomas - that he was

1 required to have a cellmate. Should have they
2 notified you?

3 MS. [REDACTED]: They should have
4 notified me. If they knew that he was supposed
5 to have a cellie and he didn't, yes. And they
6 would have.

7 MR. [REDACTED]: And in this -?

8 MS. [REDACTED]: If they had known
9 that they would have.

10 MR. [REDACTED]: In this instance they
11 never notified you though. Correct?

12 MS. [REDACTED]: No.

13 MR. [REDACTED]: So they didn't tell you,
14 and during this 4:00 a.m., it sounds like you
15 talked to them twice. They never told you that
16 Epstein didn't have a cellmate?

17 MS. [REDACTED]: No.

18 MR. [REDACTED]: Did they discuss Epstein
19 with you at all?

20 MS. [REDACTED]: No.

21 MR. [REDACTED]: Okay. And did they -
22 when they called control or any communications
23 you had over the telephone - did they ever
24 discuss Epstein?

25 MS. [REDACTED]: No.

1 MR. [REDACTED]: Or the cellmate?

2 MS. [REDACTED]: No.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: No.

5 MR. [REDACTED]: So these are the
6 questions. We just want more like yes-no like
7 this. And I don't mean to rush you, but we
8 have a bunch of other interviews we have to
9 conduct. So if we can keep to those like yes-
10 no type of things would be so appreciated on
11 our end.

12 MS. [REDACTED]: Well I can assure you
13 that everything is not going to be a flat yes
14 or no answer.

15 MR. [REDACTED]: Absolutely. I 100% get
16 that.

17 MS. [REDACTED]: Because nothing in
18 this business is --

19 MR. [REDACTED]: Right.

20 MS. [REDACTED]: -- flat yes or no.
21 It's all off the cuff. So.

22 MR. [REDACTED]: Absolutely. And that's
23 what we're just saying. Like if [REDACTED] knew,
24 what should have he done. It sounds like what
25 you're saying is he should have notified the

1 captain and he should have made sure a cellmate
2 was put in there. If [REDACTED] knew, same thing.
3 He should have notified the captain, he should
4 have put someone there. If you knew, you
5 should have notified the caption, you should
6 have put someone there. That's just the kind
7 of what the ops lieutenant does. Would it be
8 basically the ops lieutenant if it came up to
9 that person? They notify the captain. They
10 make sure it's done. Is that a fair
11 assessment?

12 MS. [REDACTED]: Yeah. That's a fair
13 assessment. And you're just notifying - and
14 the only reason why we're letting the captain
15 know is to let him know. Hey, you know you
16 guys, we keep telling you this guy should be on
17 10 South, but you keep him on SHU. And we keep
18 running into these close - really, really,
19 close calls.

20 MR. [REDACTED]: So the staff -.

21 MS. [REDACTED]: So that's one reason
22 why --

23 MR. [REDACTED]: Is the staff ever -?

24 MS. [REDACTED]: -- you notify them.

25 MR. [REDACTED]: Did you ever have any

1 discussions about him needing to be 10 South
2 with anyone prior to -?

3 MS. [REDACTED]: Everybody was telling
4 them that he needed to be on 10 South.
5 Everybody knew that.

6 MR. [REDACTED]: Alright. So prior to him
7 even dying, you know, prior to August 10th. It
8 was the captain and above were notified, hey we
9 need to get him on 10 South?

10 MS. [REDACTED]: Let me tell you
11 something. If we as lieutenants are
12 responsible for knowing everything that we're
13 supposed to know. And we're running this
14 institution off the cuff, we don't know what's
15 going to happen here at any given time of the
16 day or night. If we're required to know that,
17 you think that these cats in the region and in
18 the central office and at the executive staff
19 level don't know the same thing that or more
20 than we know?

21 MR. [REDACTED]: So I guess the question
22 is have you ever had any conversation - did you
23 ever have any conversations with the caption
24 yourself at that time?

25 MS. [REDACTED]: We've mentioned to

1 them several times that Epstein should be on 10
2 South.

3 MR. [REDACTED]: So who did you have
4 conversations with regarding that?

5 MS. [REDACTED]: We've - I've never
6 had a conversation with anybody. But during
7 these times, when this stuff was happening, I
8 used to always say you guys need to put Epstein
9 on 10 South. Epstein needs to be on 10 South.

10 MR. [REDACTED]: So my question is when
11 you say, "you guys," who were you saying that
12 to?

13 MS. [REDACTED]: [REDACTED]. I would tell
14 [REDACTED].

15 MR. [REDACTED]: So you specifically told
16 [REDACTED]?

17 MS. [REDACTED]: I would tell [REDACTED]
18 that -.

19 MR. [REDACTED]: Do you remember what his
20 responses were?

21 MS. [REDACTED]: No. I don't remember
22 what his -. Apparently, it was nothing. He
23 never got moved.

24 MR. [REDACTED]: Right. And that's what I
25 just meant. Did you say like did he

1 acknowledge at least that information that was
2 provided to him? Hey, he should be on 10
3 South?

4 MS. [REDACTED]: I don't know if he
5 did or not.

6 MR. [REDACTED]: But you do recall
7 actually telling him that?

8 MS. [REDACTED]: We all used to say
9 that Epstein needs to be 10 South.

10 MR. [REDACTED]: Did you do it with a
11 group of other lieutenants when you say, "we
12 all used to?"

13 MS. [REDACTED]: No.

14 MR. [REDACTED]: But you yourself. Do you
15 recall at least on one occasion or more that
16 you told [REDACTED] that?

17 MS. [REDACTED]: Yeah. I mentioned to
18 [REDACTED] that Epstein should be on 10 South.
19 Yes.

20 MR. [REDACTED]: Prior to August 10th?

21 MS. [REDACTED]: I don't know what the
22 date was.

23 MR. [REDACTED]: I just mean prior to him
24 dying you told him this?

25 MS. [REDACTED]: Yes. Prior to him

1 dying. And after he died. I mean.

2 MR. [REDACTED]: Okay. Sorry, I'll hand
3 it back over to you. I apologize for
4 hijacking.

5 MR. [REDACTED]: Do you have anything else on
6 that topic? Because I'm going to jump through
7 that.

8 MR. [REDACTED]: No. The main things,
9 again, are these about the email. Why it
10 wasn't received. The cellmate requirements
11 which she said that she didn't. who was
12 responsible for telling her that? What action
13 should have been taken. What did she know -?

14 MR. [REDACTED]: That's (Indiscernible
15 *02:01:29)

16 MR. [REDACTED]: Sure.

17 MR. [REDACTED]: So I'm just going to jump to
18 a different topic.

19 MR. [REDACTED]: And you mentioned how
20 cameras are so important in 10 South. So now
21 we're going to talk about the cameras that were
22 actually in the SHU.

23 MS. [REDACTED]: Mm-hmm.

24 MR. [REDACTED]: So basic question. Who had
25 access to see what was happening on the

1 cameras?

2 MS. [REDACTED]: What cameras?

3 MR. [REDACTED]: The cameras inside the MCC.

4 As a lieutenant did you ever utilize the

5 cameras for your job?

6 MS. [REDACTED]: I mean what cameras

7 are you talking about? Because we don't -

8 those of us who have access to cameras don't

9 have access to the same cameras or -.

10 MR. [REDACTED]: You want to know about

11 the SHU cameras.

12 MR. [REDACTED]: Yeah. It's about the SHU

13 cameras.

14 MR. [REDACTED]: Who has access to the SHU

15 cameras?

16 MS. [REDACTED]: Control. The control

17 center has access to the SHU cameras. We have

18 access to the SHU cameras. And as far as I

19 know, that's it.

20 MR. [REDACTED]: When you say "we," is

21 that the lieutenant's office?

22 MS. [REDACTED]: The lieutenant's

23 office.

24 MR. [REDACTED]: Do you normally utilize the

25 cameras for your job at all? For you daily

1 routine. Do you ever use it?

2 MS. [REDACTED]: If we're looking for
3 - say we're looking for somebody say internal.

4 MR. [REDACTED]: Okay.

5 MS. [REDACTED]: We may glance at the
6 camera to see if we see them or something like
7 that. But we're not sitting there. We don't
8 even have time to do that. And even if we did,
9 we wouldn't be doing it. We're not sitting up
10 there the whole time during our shift and just
11 looking at the cameras to see what's going on.

12 MR. [REDACTED]: No. That's not what I mean.
13 I just want to know. At that time - around
14 that time period, did you know that there were
15 cameras inside the MCC that were not working?

16 MS. [REDACTED]: I don't believe I
17 did.

18 MR. [REDACTED]: So it -.

19 MR. [REDACTED]: Specific to the SHU.

20 MS. [REDACTED]: Oh. No.

21 MR. [REDACTED]: Did you know the cameras

22 --

23 MS. [REDACTED]: No.

24 MR. [REDACTED]: -- in the SHU were --

25 MS. [REDACTED]: No-no-no.

1 MR. [REDACTED]: -- not working?

2 MS. [REDACTED]: No-no-no. I wasn't
3 aware.

4 MR. [REDACTED]: So even though you were
5 the lieutenant at that night did you not know -
6 ?

7 MS. [REDACTED]: The only cameras that
8 I would know that I would be aware of if
9 they're working or not would be the cameras
10 that I have access to which I can look on the
11 TV monitor and see that they're actively not
12 working at the time. Or one of the other staff
13 members who have access to cameras would call
14 and tell me or say something to me about that
15 camera not working.

16 MR. [REDACTED]: And did you know on
17 August 10th during your shift or I guess late
18 August 9th, early August 10th, that any cameras
19 in the SHU were not working?

20 MS. [REDACTED]: No. I wasn't aware of
21 that.

22 MR. [REDACTED]: As far as you remember,
23 were the live portion of the cameras working in
24 there? The ones that you were able to monitor
25 in real-time.

1 MS. [REDACTED]: The camera that we
2 had access to from the lieutenant's office at
3 the time was working.

4 MR. [REDACTED]: Would that show you both
5 the staff members as well as the range?

6 MS. [REDACTED]: That camera only -
7 that camera was really -. The visibility on it
8 was bad. It has always been bad.

9 MR. [REDACTED]: So was it only one camera
10 that you could access from your office of the
11 SHU?

12 MS. [REDACTED]: There was only one
13 camera that's up there on that monitor.

14 MR. [REDACTED]: Okay. And what does that
15 camera show?

16 MS. [REDACTED]: I think it shows like
17 the common area.

18 MR. [REDACTED]: Okay. So it doesn't even
19 --

20 MS. [REDACTED]: The SHU.

21 MR. [REDACTED]: -- show the range?

22 MS. [REDACTED]: The ranges and stuff
23 like that? No.

24 MR. [REDACTED]: But are there cameras on
25 the range?

1 MS. [REDACTED]: Yes. There's cameras
2 on the range.

3 MR. [REDACTED]: So who has access to
4 monitor that?

5 MS. [REDACTED]: I mean whoever has it
6 up on their computer -.

7 MR. [REDACTED]: Okay. So you could
8 toggle through what you want to look at.

9 MS. [REDACTED]: We can't toggle
10 through --

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: -- on our cameras in
13 the lieutenant's office. No.

14 MR. [REDACTED]: Okay.

15 MS. [REDACTED]: And I don't -.

16 MR. [REDACTED]: So in the lieutenant's
17 office, it's just -. Would control center?
18 Would they be the ones that would be having
19 eyes on the range?

20 MS. [REDACTED]: Nobody is sitting
21 around watching the range.

22 MR. [REDACTED]: Sure.

23 MS. [REDACTED]: The only people who
24 would be watching the cameras is the officers
25 that's assigned to 10 South.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: Because they have the
3 monitors right there at their desks.

4 MR. [REDACTED]: 10 South or 9 South?

5 MS. [REDACTED]: 10 South.

6 MR. [REDACTED]: So 10 South watches the
7 SHU as well?

8 MS. [REDACTED]: No. Ten South
9 watches the inmates assigned to 10 South.

10 MR. [REDACTED]: Oh. Sorry. But specific
11 -. We're talking specifically to the SHU. So
12 if, for instance, the range -.

13 MS. [REDACTED]: No. You asked me who
14 would be watching SHU. Who would have access
15 to those cameras? And I'm telling you the only
16 person who would be watching any cameras and
17 who is required to watch them would be the
18 officers that are assigned to 10 South.
19 Outside of that --

20 MR. [REDACTED]: But my question is --

21 MS. [REDACTED]: -- nobody is watching
22 any camera.

23 MR. [REDACTED]: -- so no one is watching
24 it. But who --

25 MS. [REDACTED]: As far as I know.

1 MR. [REDACTED]: -- would have had access
2 to it I guess is what we're saying. Who - if
3 someone wanted to look at the range within the
4 special housing unit, who would have access to
5 that camera?

6 MS. [REDACTED]: I don't know if
7 control has access to that.

8 MR. [REDACTED]: Okay. But your point is
9 no one's watching that. So if it's down, who
10 would know and how?

11 MS. [REDACTED]: I would think the
12 people who are responsible for the cameras
13 would know.

14 MR. [REDACTED]: And who is responsible
15 for the cameras?

16 MS. [REDACTED]: The um, the
17 communication guys.

18 MR. [REDACTED]: Do you know who -?

19 MS. [REDACTED]: And that would be if
20 they -. I don't even know if they look at
21 every camera every day to make sure that --

22 MR. [REDACTED]: Sure.

23 MS. [REDACTED]: -- they operative
24 because usually, staff reports that camera
25 stuff when they notice it.

1 MR. [REDACTED]: Well how - so would
2 people in the SHU know that their cameras were
3 down?

4 MS. [REDACTED]: I don't know if they
5 would know that. I have no way of knowing
6 that.

7 MR. [REDACTED]: You just said if staff
8 reported it. So that's the question would be
9 like, if the range camera in the SHU was down,
10 who would know? Who would they notify? Who
11 was responsible? Do you follow? So how would
12 they know that the range camera was down?

13 MS. [REDACTED]: I have no idea how
14 they would know.

15 MR. [REDACTED]: You don't know?

16 MS. [REDACTED]: Unless they have
17 access to it and they know - they can see it on
18 a monitor or something like that and see that
19 it's not working. I don't know outside of that
20 how they would know.

21 MR. [REDACTED]: DO you know -?

22 MS. [REDACTED]: Unless they was told.
23 I don't know.

24 MR. [REDACTED]: Does the SHU have access
25 to that?

1 MS. [REDACTED]: Not that I'm aware
2 of.

3 MR. [REDACTED]: Okay. So but you think
4 the communications would be the ones that would
5 know. Who in communications would be
6 responsible for getting it taken care of -
7 fixing the cameras?

8 MS. [REDACTED]: If they knew about
9 it?

10 MR. [REDACTED]: Right.

11 MS. [REDACTED]: The guys that work in
12 communications.

13 MR. [REDACTED]: All of them collectively?
14 Or is there one person?

15 MS. [REDACTED]: I - look. Look. I
16 don't work in communications.

17 MR. [REDACTED]: Sure.

18 MS. [REDACTED]: So I don't know if
19 one would know, another one would know, or if
20 they both would know at the same time. I don't
21 know. I can't tell you how another department
22 operates or how they conduct their business.

23 MR. [REDACTED]: Okay. Was there someone
24 named Mr. [REDACTED]? (Phonetic Sp. *02:07:26)

25 MS. [REDACTED]: Mr. [REDACTED] worked

1 down there. Yes.

2 MR. [REDACTED]: Would he be potentially
3 the one responsible for fixing it?

4 MS. [REDACTED]: I'm not going to say
5 he would be responsible for fixing it. But if
6 he was notified of it, he would have done it.

7 MR. [REDACTED]: What was his -?

8 MR. [REDACTED]: Okay.

9 MS. [REDACTED]: I mean if that was
10 his job. If that's what people in this
11 institution wanted.

12 MR. [REDACTED]: Okay. And what -?

13 MS. [REDACTED]: Look. Let me make
14 this clear to you. I don't know what the
15 communications instructions were regarding -.

16 MR. [REDACTED]: And we're not asking you
17 those questions. I'm sorry. We're not asking
18 you -. We're not looking at you to solve all
19 the problems. We just need to know like as far
20 as like if a camera goes down, who fixes it?

21 MS. [REDACTED]: If a staff member had
22 access to a camera and that camera went out, we
23 would call the communications department to
24 have them take a look at that camera and to
25 repair it or replace it, to fix it or whatever

1 needed to be done.

2 MR. [REDACTED]: And roughly how quickly -

3 MS. [REDACTED]: And that depends on
4 who answered the phone. That would be whoever
5 was working down there at the time, depending
6 on which one answered the phone. That's who we
7 would relay that information to. We weren't
8 picky about talking to a specific person. It
9 would be like if they work in that area, then
10 they should be capable of doing whatever it is
11 that we need to do to restore the cameras. Or
12 whatever manner they need to go about getting
13 it done.

14 MR. [REDACTED]: How quickly usually does
15 that get resolved? If a camera goes down, do
16 they really get it back up and running pretty
17 quickly? Or does it take days?

18 MS. [REDACTED]: If they're here and
19 they can replace it, they replace it on the
20 spot.

21 MR. [REDACTED]: ON the spot?

22 MS. [REDACTED]: Right.

23 MR. [REDACTED]: Would it be abnormal for
24 it to take -. So if someone reported it on a
25 Thursday, would it be abnormal for them to wait

1 until Monday to fix it?

2 MS. [REDACTED]: I don't -. I can't
3 say that because I don't know what the
4 circumstances would be concerning why they're
5 waiting until Monday to do it.

6 MR. [REDACTED]: Okay.

7 MR. [REDACTED]: During your time as a
8 lieutenant during that time period, did you
9 ever see any cameras down for any extended
10 period of time?

11 MS. [REDACTED]: Not that I can recall
12 right at this very moment.

13 MR. [REDACTED]: And Mr. [REDACTED]. What was
14 his position? Do you remember?

15 MS. [REDACTED]: He's the
16 communications officer. I think that's his
17 title.

18 MR. [REDACTED]: Do you know his first
19 name?

20 MS. [REDACTED]: No.

21 MR. [REDACTED]: I'm going to jump.

22 MR. [REDACTED]: Yeah. Please.

23 MR. [REDACTED]: Do you recall when you came
24 that evening August 9th. That evening when you
25 came on the shift. Do you recall hearing about

1 Epstein making a phone call?

2 MR. [REDACTED]: (Indiscernible
3 *02:09:51).

4 MR. [REDACTED]: Do you recall that?

5 MS. [REDACTED]: No.

6 MR. [REDACTED]: Okay. Is it normal practice
7 -? I'm just going to -. Is it normal practice
8 -? Let's say an inmate had to make a phone
9 call. And the inmate doesn't have that line,
10 you know the PIN set up for them, is it normal
11 for an officer to use the legal line to allow
12 the inmate to make a phone call?

13 MS. [REDACTED]: Not that I'm aware
14 of.

15 MR. [REDACTED]: Okay. Have you ever heard of
16 anyone using the legal line for other, for
17 anything unauthorized?

18 MS. [REDACTED]: No.

19 MR. [REDACTED]: Okay. Did you interact or
20 see Epstein on August 9th? Interact with or
21 see Epstein on August 9th?

22 MS. [REDACTED]: No.

23 MR. [REDACTED]: Okay.

24 MR. [REDACTED]: So neither August 9th nor
25 August 10th?

1 MS. [REDACTED]: No.

2 MR. [REDACTED]: Did you ever have any
3 interactions with Epstein?

4 MS. [REDACTED]: Yes, I've had
5 interaction. When he committed the suicide -
6 when he attempted suicide. I interacted with
7 him then.

8 MR. [REDACTED]: What about after that
9 date?

10 MS. [REDACTED]: After that day, no.

11 MR. [REDACTED]: Did you even see him
12 after that day?

13 MS. [REDACTED]: No.

14 MR. [REDACTED]: No? What about the cells
15 in the SHU? Can you see through them or are
16 they like, do you open up a slide in order to
17 see in?

18 MS. [REDACTED]: No. You can see
19 through it.

20 MR. [REDACTED]: You can see through them?

21 MS. [REDACTED]: Mm-hmm.

22 MR. [REDACTED]: From the SHU desk, can
23 you see?

24 MS. [REDACTED]: No. No. No. No.

25 MR. [REDACTED]: So if Epstein's desk I

1 think that's what we're showing you before was
2 the SHU layout. I think it was 15 feet - the
3 closest cell to where the people are sitting in
4 the SHU. They cannot see -.

5 MS. [REDACTED]: I don't care where
6 you are inside a housing unit. You cannot see
7 from any - unless you're standing there in that
8 window, you can't see inside somebody's -.

9 MR. [REDACTED]: And is the window open
10 the whole time?

11 MS. [REDACTED]: I mean you may be
12 able to see if their light is on or something
13 like that. Whatever that window - whatever you
14 can see from that vantage point, you may be
15 able to see like the corner of something or
16 whatever. But no.

17 MR. [REDACTED]: Is the window open the
18 whole time? Or do you have to open it and
19 close it?

20 MS. [REDACTED]: The window is open
21 all the time.

22 MR. [REDACTED]: And about how big is that
23 window?

24 MS. [REDACTED]: I don't know how big
25 it is.

1 MR. [REDACTED]: Is it like 12 inches by
2 12 inches?

3 MS. [REDACTED]: I don't know how big
4 it is.

5 MR. [REDACTED]: Okay. But you've been in
6 the SHU though?

7 MS. [REDACTED]: Yes I've been in the
8 SHU. But I don't have to measure the window to
9 tell you how big it is.

10 MR. [REDACTED]: But I mean the difference
11 between like you know a three-foot by two-foot
12 or is it like -?

13 MS. [REDACTED]: I'm not going to -
14 I'm not even going to speculate on the
15 measurements. I mean.

16 MR. [REDACTED]: Is it -?

17 MS. [REDACTED]: I don't know how big.
18 I don't know the measurements of the window.

19 MR. [REDACTED]: So we've never been in
20 there. So we're just asking because we've
21 never put eyes on - in the SHU. So is it a
22 large thing that you can - where you have to
23 kind of like get up close to it or -?

24 MS. [REDACTED]: No. It's a little
25 narrow. It's a small window. It's not a big,

1 huge window where -.

2 MR. [REDACTED]: So would it be like as
3 big as this?

4 MS. [REDACTED]: No. It wouldn't be
5 that big.

6 MR. [REDACTED]: So smaller than basically
7 12X12? Roughly 16X12?

8 MS. [REDACTED]: Sir, go up there and
9 look at the window. Because I don't --

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: -- know the
12 measurements of the window.

13 MR. [REDACTED]: Okay. So for the record,
14 I'm holding up a piece of paper that's roughly
15 16 inches by 12 inches. And it is being said
16 that it is smaller than that.

17 MR. [REDACTED]: SHU inmates. What are they
18 allowed to have in their cell? What kind of
19 items are they allowed to have inside their
20 cell? If you're placed in the SHU.

21 MR. [REDACTED]: It depends on what your
22 status is in the SHU. I mean you have inmates
23 that are in there on AD status. You have
24 inmates that --

25 MR. [REDACTED]: What's AD?

1 MS. [REDACTED]: -- are on DS.
2 Administrative Detention. You have inmates
3 that they're on disciplinary segregation. You
4 have inmates up there that are up there for
5 protective custody. You have inmates up there
6 for various reasons. So there is different
7 items that each, depending on their status,
8 they are allowed to have.

9 MR. [REDACTED]: So there's no set SHU policy
10 on what inmate is allowed to have and not have
11 in the cell?

12 MS. [REDACTED]: I don't know what
13 their policies - what their policy is. If they
14 have a set policy here, in general, I've never
15 seen a set policy for this institution in
16 particular about what the inmates can have or
17 what they couldn't have if they're in SHU.

18 MR. [REDACTED]: Okay so no -.

19 MS. [REDACTED]: But I'm sure there
20 has to be something.

21 MR. [REDACTED]: So what kind of holding was
22 Epstein under? What would he fall under?

23 MS. [REDACTED]: I don't know what.
24 To be honest with you, I don't know what,
25 because he wasn't up there for disciplinary

1 action. He wasn't up there pending
2 disciplinary action. So I'm going to - and I
3 don't want to say he was up there for
4 protective custody. Because like I said
5 previously, and I'll continue to say that, for
6 someone in his position, he never should have
7 been up on SHU.

8 MR. [REDACTED]: Now someone in the SHU. Are
9 they allowed to have the same types of items as
10 a normal person in a regular cell? Or they
11 have only a limited amount of items?

12 MS. [REDACTED]: Um, Epstein, to be
13 honest with you, there's no telling what they
14 didn't allow Epstein to have in his cell.

15 MR. [REDACTED]: Why do you say it like that?

16 MS. [REDACTED]: I say it like that
17 because I know that he was always trying to get
18 things that he wasn't supposed to have. And to
19 be honest with you, I don't know if they
20 approved them or not.

21 MR. [REDACTED]: What was he trying to get?

22 MS. [REDACTED]: He was - when he was
23 in attorney conference he was trying to get his
24 meals delivered - his hot trays and stuff like
25 that. Regular inmate trays delivered to

1 attorney conference. Things of that nature.

2 So -.

3 MR. [REDACTED]: Did he get special
4 privileges?

5 MS. [REDACTED]: I don't know if he
6 did or not because I worked nights. So I
7 didn't have a lot of interactions with Epstein
8 or any other inmates during the daytime because
9 I wasn't here.

10 MR. [REDACTED]: Was Epstein allowed to have
11 pill bottles in his cell?

12 MS. [REDACTED]: I don't know if he
13 was or not.

14 MR. [REDACTED]: Are inmates allowed to have
15 pill bottles in the cell?

16 MS. [REDACTED]: If medical says that
17 they can have them, yes.

18 MR. [REDACTED]: Okay. How many changes of
19 clothing or linens are inmates allowed to have
20 in the SHU?

21 MS. [REDACTED]: I don't know what
22 their policy is up there on SHU. My previous
23 institution, they in SHU, they don't have any
24 exchange of clothing up in SHU. When they get
25 their shower, their rec and shower, they're

1 given a new set of clothing at that time. But
2 they don't maintain any additional clothing in
3 the special housing unit outside of that. I
4 don't know what they do here. But that's how
5 it was always done at my previous institution.

6 MR. [REDACTED]: So inmates shouldn't have two
7 or three different pairs of -?

8 MS. [REDACTED]: Like I said, I don't
9 know what their policy is or was in SHU at that
10 time because things change here. Because
11 things around here change on a moment-to-moment
12 basis.

13 MR. [REDACTED]: How was Epstein interaction
14 with other inmates? Did he have any issues
15 with any inmates?

16 MS. [REDACTED]: I don't know what his
17 interaction was with other inmates.

18 MR. [REDACTED]: When was the last time you
19 interacted with Epstein?

20 MS. [REDACTED]: I just told you.
21 When he attempted suicide.

22 MR. [REDACTED]: Okay. Do you know why
23 Epstein was in prison?

24 MS. [REDACTED]: Uh, because of some
25 allegation that he was having - engaging in

1 sexual acts with underage females.

2 MR. [REDACTED]: So the next set of questions
3 is just general questions we have to ask. Did
4 you have any specific feelings regarding why he
5 was in prison?

6 MS. [REDACTED]: No.

7 MR. [REDACTED]: Okay. Did you speak about
8 Epstein with other inmates?

9 MS. [REDACTED]: No.

10 MR. [REDACTED]: What time did you leave shift
11 hat day? I know -.

12 MS. [REDACTED]: It was right after
13 5:00.

14 MR. [REDACTED]: After 5:00?

15 MS. [REDACTED]: Yes.

16 MR. [REDACTED]: And when did you hear about
17 the incident?

18 MS. [REDACTED]: I think it was - I
19 was working late that day because I had some -
20 I was still finishing up my work. And I don't
21 know probably 7:00 sometime after 7:00 I guess.

22 MR. [REDACTED]: You left after 7:00? Or you
23 heard after 7:00?

24 MS. [REDACTED]: I think it was after
25 7:00. I wasn't really looking at the clock. I

1 was here working. I had went downstairs to
2 finish some work that I had that I didn't get
3 to finish during my shift. And at some point
4 in time, that's when I heard that um that they
5 had had a medical emergency up in SHU.

6 MR. [REDACTED]: But were you here on the
7 premises?

8 MS. [REDACTED]: Yes. I was still
9 here.

10 MR. [REDACTED]: Did you respond up there at
11 all?

12 MS. [REDACTED]: I called up there to
13 make sure everybody was okay. And they - when
14 I asked who was up there they was telling me
15 that they didn't have but one or two staff
16 members up there. So yes. I went up there to
17 see if they needed some help because I knew
18 feeding and all that stuff still needed to be
19 done.

20 MR. [REDACTED]: So when you went up to the
21 SHU after the incident, was Epstein still in
22 the SHU or was he removed already?

23 MS. [REDACTED]: No. He wasn't there.

24 MR. [REDACTED]: He wasn't there. Did you get
25 to see the inside of the cell?

1 MS. [REDACTED]: No. No. Nope.

2 MR. [REDACTED]: Did you have any
3 communications with Michael Thomas or Tova Noel
4 after this incident?

5 MS. [REDACTED]: Noel was still there.
6 I asked her if she was okay. And she said, you
7 know, not really. And I went to help them feed
8 and shortly after that, when I came back up out
9 the range after feeding the tier, she was gone.
10 They had pulled her off her post.

11 MR. [REDACTED]: Okay. After that day, did
12 you have any communications with them?

13 MS. [REDACTED]: No.

14 MR. [REDACTED]: Okay.

15 MR. [REDACTED]: When inmates come off of
16 suicide watch and are in or assigned to the
17 SHU, so suicide watch to the SHU. Are they
18 assigned a cellmate?

19 MS. [REDACTED]: One more time.

20 MR. [REDACTED]: So when inmates come off
21 of suicide watch or psych observation and
22 they're on psych observation due to suicide
23 watch, are they assigned -. If they are then
24 assigned to the SHU, are they assigned a
25 cellmate?

1 MS. [REDACTED]: No.

2 MR. [REDACTED]: No? When you said that
3 you were working nights, were you working
4 nights all in August 2019?

5 MS. [REDACTED]: I don't. If that was
6 my quarterly post, more than likely I was. But
7 offhand I can't remember.

8 MR. [REDACTED]: Do you remember if you
9 would have been working days as well? I'm just
10 trying to rectify -.

11 MS. [REDACTED]: I mean I would have
12 to look at my schedule.

13 MR. [REDACTED]: Sure.

14 MS. [REDACTED]: I don't know if I was
15 working both or if I was strictly assigned to
16 that one. I'm not sure.

17 MR. [REDACTED]: Okay.

18 MR. [REDACTED]: I just had a follow-up on
19 that.

20 MR. [REDACTED]: So you said. Sorry, go
21 ahead.

22 MR. [REDACTED]: Did you work overtime during
23 that time?

24 MS. [REDACTED]: What do you mean?

25 MR. [REDACTED]: You mentioned everyone's

1 working overtime during that time. Right?

2 Everyone's mandated and everything.

3 MS. [REDACTED]: I'm sure at some
4 point in time. I don't know if it was around
5 that time, but yeah. If a lieutenant then
6 called in sick, yeah. We was required to stay
7 and work that shift.

8 MR. [REDACTED]: Would that be -? So that
9 would be the day watch?

10 MS. [REDACTED]: It could have been
11 either or. Well depending on what shift you're
12 working.

13 MR. [REDACTED]: So you said you were
14 involved with responding to the July 23rd
15 incident where Epstein originally tried to
16 commit suicide?

17 MS. [REDACTED]: Yes.

18 MR. [REDACTED]: Now is it your
19 understanding that he tried to commit suicide?

20 MS. [REDACTED]: As far as I know.

21 MR. [REDACTED]: Did you hear anything
22 about his cellmate attempting to kill him?

23 MS. [REDACTED]: There was some
24 reference that I guess he had mentioned at that
25 time that his cellmate had done that to him.

1 But when I went back and spoke to him he never
2 mentioned that to me. He never said anything.

3 MR. [REDACTED]: When you say, you
4 actually questioned Epstein?

5 MS. [REDACTED]: Yes.

6 MR. [REDACTED]: And what did he say to
7 you?

8 MS. [REDACTED]: He didn't say
9 anything. He really didn't say anything about
10 the incident. He said that he had gotten up to
11 get some water and the next thing he knew -. I
12 think that was what he said. He had gotten up.
13 I would have to look at my memo. I think he
14 said he had gotten up to get some water or
15 something like that. And the next thing he
16 knew we were there.

17 MR. [REDACTED]: Okay. And what number
18 were you in responding?

19 MS. [REDACTED]: I don't know what -
20 if I was first if we went because usually when
21 we respond to an emergency, we -. Even if I
22 get on the elevator first, the elevator may
23 stop and pick up somebody else along the way.
24 But I think it was me and I don't know. I
25 don't remember.

1 MR. [REDACTED]: When you did respond,
2 what did you see?

3 MS. [REDACTED]: Um.

4 MR. [REDACTED]: When you got to the cell?

5 MS. [REDACTED]: He was lying on the
6 floor. He appeared to be unresponsive. But
7 when we walked up to him, we would see his
8 chest rising. And he was kind of clammy.

9 MR. [REDACTED]: Did he have anything
10 around his neck?

11 MS. [REDACTED]: No. He didn't have
12 anything around his neck.

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: And there were
15 different times when he would open one eye and
16 kind of you know like he was trying to see what
17 we were doing. And then he would close his
18 eyes. But he would never respond to us. He
19 just wanted to maintain that mode like he was
20 unconscious or something like that. I guess.
21 I don't know what was going through his mind.

22 MR. [REDACTED]: Do you know if someone
23 removed something that was around his neck?

24 MS. [REDACTED]: I don't know if
25 someone. I don't know.

1 MR. [REDACTED]: Okay. Point being, like
2 if he's claiming someone tried to kill him, but
3 also at the same time is saying that he's
4 trying to commit suicide. He didn't have
5 anything around his neck. Is there any reason
6 for you to believe that his cellmate was
7 actually trying to kill him?

8 MS. [REDACTED]: No. I mean I had no
9 proof that his cellmate tried to do anything to
10 him. And I'm trying to remember what the
11 officer said. I don't even remember offhand
12 what the officers were telling me. I don't
13 know if they saw him with something around his
14 neck or what they observed. But I can't
15 remember. I would have to refer back to my
16 notes. Because that was a long time ago.

17 MR. [REDACTED]: Sure. So if counts are
18 not conducted. And I'm assuming -. Are counts
19 more important than rounds? Or are they both
20 just as equally as important?

21 MS. [REDACTED]: I mean they're both
22 important. They are both independently
23 important.

24 MR. [REDACTED]: Okay. So let's go first
25 with counts. If counts are not conducted, who

1 is -. So if counts are signed off on. You're
2 given a count slip. If those counts actually
3 weren't conducted. So if let's say for
4 instance that during your shift, the 12:00
5 a.m., the 3:00 a.m., and the 5:00 a.m. If they
6 were not conducted - those counts- who is
7 responsible for that? For them being signed
8 and certified? Who - so I'm assuming the
9 people? Noel and Thomas are the ones assigned
10 to that shift. And they are the ones who
11 certify that those counts were conducted and
12 then provided to you. Are they the only ones
13 that are responsible for providing false
14 information?

15 MS. [REDACTED]: Providing false
16 information?

17 MR. [REDACTED]: Correct. So if they're
18 saying they conducted counts but they didn't.
19 So they were providing you with something
20 saying either 72 or 73, but those counts were
21 not conducted.

22 MS. [REDACTED]: How would I know if
23 they weren't conducted?

24 MR. [REDACTED]: Right. That's what I'm
25 asking. So are they the only ones that are

1 responsible for falsifying that?

2 MS. [REDACTED]: Who else would know
3 whether or not they did them or not? I mean --

4 MR. [REDACTED]: That's what I'm asking.

5 MS. [REDACTED]: -- no one else would
6 have any way of knowing.

7 MR. [REDACTED]: So it doesn't go above
8 them. If they are the ones that are saying it,
9 there's no other people that can like verify
10 that it actually was conducted.

11 MS. [REDACTED]: How would they verify
12 it?

13 MR. [REDACTED]: That's my question to
14 you.

15 MS. [REDACTED]: And that's what I'm
16 saying to you. If they're the ones that are -.
17 There is no reason whatsoever for us to ever
18 believe that someone is not conducting their
19 counts or doing what they're supposed to be
20 doing. You know. We're not out there with
21 them. I mean we have no way of knowing what -.
22 As far as I know, no one has any way of knowing
23 what I'm doing when I'm here.

24 MR. [REDACTED]: Sure.

25 MS. [REDACTED]: You know so you have

1 to have confidence in and you have to know your
2 staff. That's what it comes down to. You have
3 to walking and talking. It's not just about
4 the inmates. It's not just about you know what
5 we did with Epstein. It's about every inmate
6 that was being housed at MCC at the time.
7 Every inmate had the potential to hang
8 themselves or kill themselves or do whatever.
9 It wasn't just about Epstein. We're
10 responsible for every inmate in this
11 institution.

12 MR. [REDACTED]: Sure.

13 MS. [REDACTED]: And I have - if I
14 have absolutely no reason to believe that a
15 staff member in this building, or doubt, unless
16 they reveal something to me that would make me
17 doubt what they said is true.

18 MR. [REDACTED]: So -.

19 MS. [REDACTED]: Other than that, I
20 have no reason to believe that a staff member
21 isn't doing what they're supposed to be doing.

22 MR. [REDACTED]: So if you were told that
23 the 12:00 a.m., 3:00 a.m. and 5:00 a.m. counts
24 were not conducted on August 10th, does that
25 surprise you?

1 MS. [REDACTED]: Yes, that would
2 surprise me.

3 MR. [REDACTED]: It does surprise you?

4 MS. [REDACTED]: Yes.

5 MR. [REDACTED]: Okay. Do you have any
6 reasons to believe that either Thomas or Noel
7 did not conduct counts in the past?

8 MS. [REDACTED]: No.

9 MR. [REDACTED]: No?

10 MS. [REDACTED]: I have no reason to
11 believe. I don't even believe that they didn't
12 do it that night to be honest with you. But
13 no, I have no reason to believe that they
14 didn't --.

15 MR. [REDACTED]: Have you heard that they
16 made any statements to any other staff members
17 about not conducting rounds or counts?

18 MS. [REDACTED]: No. No.

19 MR. [REDACTED]: So you never heard those
20 either?

21 MS. [REDACTED]: No.

22 MR. [REDACTED]: Okay. And you don't know
23 of them ever not conducting counts or rounds
24 other than -?

25 MS. [REDACTED]: I don't know of them

1 or any other staff members not conducting
2 counts or rounds or anything like that.

3 MR. [REDACTED]: Okay. And you didn't -?
4 On August 10th, did you speak to them at all
5 about hey did you guys really do these counts?

6 MS. [REDACTED]: No.

7 MR. [REDACTED]: Okay.

8 MS. [REDACTED]: No.

9 MR. [REDACTED]: What about with the
10 rounds? So would you be surprised to find out
11 that they didn't' do rounds on August 10th
12 during your shift?

13 MS. [REDACTED]: Yes. I would be
14 surprised to find out --

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: -- that they didn't'
17 do rounds. Yes.

18 MR. [REDACTED]: So if it were found out
19 that they didn't do any rounds. That to you is
20 shocking? You would be like wait what?

21 MS. [REDACTED]: Yes. I would be
22 surprised that they didn't do

23 MR. [REDACTED]: Okay. Do you have any
24 follow-ups on those specific questions?
25 Specifically with regards to falsification of

1 rounds and counts? Who has to sign off on the
2 counts and rounds?

3 MR. [REDACTED]: What do you mean?

4 MR. [REDACTED]: So is it solely the COs
5 that are in the SHU? Or does someone else have
6 to verify on the counts that they were
7 conducted?

8 MS. [REDACTED]: I mean you can't
9 verify that they're conducted. You can verify
10 that the -.

11 MR. [REDACTED]: That they provided you
12 that information.

13 MS. [REDACTED]: Right. That they
14 turned in the count slip.

15 MR. [REDACTED]: Right.

16 MS. [REDACTED]: But you can't verify
17 anything else.

18 MR. [REDACTED]: So there's no procedure
19 in place for a lieutenant to make sure that COs
20 are actually performing the duties that they
21 say they're doing?

22 MS. [REDACTED]: Do you know how many
23 people who have -? Supervisors would have to
24 be in -? That would mean that a supervisor
25 would have to be on every unit during every

1 count.

2 MR. [REDACTED]: Well I'm talking
3 specifically about the SHU.

4 MS. [REDACTED]: And watching the
5 count.

6 MR. [REDACTED]: I'm speaking specifically
7 to the SHU. So in the special housing unit,
8 there's no verification process. If the COs
9 are saying they did it, you just take their
10 word. There's no way to verify it?

11 MS. [REDACTED]: SHU is no different,
12 sir. Before this incident with Epstein, SHU
13 was no different than any other unit in this
14 building. It's not about whether or not solely
15 whether or not SHU is doing it. It's about
16 whether --

17 MR. [REDACTED]: So you're saying --

18 MS. [REDACTED]: -- everybody on every
19 unit --

20 MR. [REDACTED]: -- prior to this incident
21 --

22 MS. [REDACTED]: -- is doing it.

23 MR. [REDACTED]: -- is there something
24 that has been implemented since then? To
25 ensure that counts and rounds are being

1 conducted?

2 MS. [REDACTED]: No.

3 MR. [REDACTED]: So it's still the same.
4 It's all up to the COs. If they're certifying
5 that they did it, the lieutenants are taking
6 their word for it.

7 MS. [REDACTED]: That's correct.

8 MR. [REDACTED]: Okay.

9 MS. [REDACTED]: That's correct. As
10 far as I know. Yes.

11 MR. [REDACTED]: On August 10th during
12 your shift from August 9th 10:00 p.m. to 6:00
13 a.m. the following day. What was the chain of
14 command? Was it Noel or Thomas, or was there a
15 hierarchy? Was one in charge of the other?
16 Was one subordinate or were they both equal?

17 MS. [REDACTED]: What do you mean?
18 You mean inside the SHU?

19 MR. [REDACTED]: Correct. So does one
20 give the other orders or do they work tougher?
21 Is there a hierarchy in there?

22 MS. [REDACTED]: Well they should be
23 working together.

24 MR. [REDACTED]: Okay. But there's no
25 like person that's in charge of the other?

1 MS. [REDACTED]: No.

2 MR. [REDACTED]: So if -?

3 MS. [REDACTED]: No.

4 MR. [REDACTED]: And how was it determined
5 with counts and rounds? Is there someone that
6 takes lead on it? Or is it?

7 MS. [REDACTED]: No.

8 MR. [REDACTED]: No?

9 MS. [REDACTED]: I mean we all have
10 the same responsibilities.

11 MR. [REDACTED]: Okay. Back over to you.

12 MR. [REDACTED]: Just for in terms of policy-
13 wise. If a count is wrong. Right, there's an
14 issue with the count. What does the policy
15 state? What should happen?

16 MS. [REDACTED]: What type of issue?

17 MR. [REDACTED]: Let's say the COs in the SHU
18 did a count. And the count comes to the
19 control center and it's wrong. They identify
20 the fact that it's wrong. What's the next
21 step?

22 MR. [REDACTED]: What do you mean? It's wrong
23 how?

24 MR. [REDACTED]: The count is off. The number
25 is wrong. Let's say it said 72 -.

1 MS. [REDACTED]: You mean the count
2 slip? The count slip comes to control -?

3 MR. [REDACTED]: Yes.

4 MS. [REDACTED]: And the count slip is
5 wrong?

6 MR. [REDACTED]: Yes.

7 MS. [REDACTED]: Then if control is
8 aware of that, and especially if control is
9 taking the count. Then control will call them
10 back and tell them I need a new count slip
11 because this one is not right. And usually the
12 only time that that would happen is would be
13 like in the incidents where we may have moved a
14 staff member during that time. And we need to
15 go back and update that count slip that we were
16 originally getting. Or like in this case with
17 the inmate being in R&D. We needed to go back
18 and get another count slip that reflected the
19 new count which was 72. Once we put the inmate
20 in R&D.

21 MR. [REDACTED]: Okay. On that same topic, if
22 the count was wrong, and you told them that
23 they needed to go back and do another count.

24 MS. [REDACTED]: Not that the count
25 was wrong. That the count slip was wrong. The

1 number that was reflected on the count slip was
2 wrong.

3 MR. [REDACTED]: Did you see them do the
4 count?

5 MS. [REDACTED]: No.

6 MR. [REDACTED]: So the number they reported
7 was wrong. The count should have been -.

8 MS. [REDACTED]: They said that they
9 had -. They said that they had their count was
10 73 but that they had there was an inmate that
11 was in R&D. So that was the problem. They
12 never did a count slip saying - they never said
13 my count is 73 and left it at that. They were
14 clear to say that the count is - SHU has 73 but
15 there is an inmate that is down on the third
16 floor in R&D. Or something to that effect.
17 They notified me that there was an inmate that
18 was off their housing unit.

19 MR. [REDACTED]: So you're saying the count
20 wasn't wrong.

21 MS. [REDACTED]: What was on the count
22 slip was wrong.

23 MR. [REDACTED]: The count slip was wrong
24 but she said that they explained it when they
25 delivered it.

1 MR. [REDACTED]: But you just stated a little
2 bit before that the count wasn't wrong, the
3 count slip was wrong.

4 MS. [REDACTED]: The count slip was
5 wrong.

6 MR. [REDACTED]: Why did you ask them to go
7 back and do the count?

8 MS. [REDACTED]: Because I needed to
9 find out what was going on with this dude in
10 R&D so that, you know, if they in fact -. If
11 we made changes to whatever the status was to
12 this guy in R&D. If he was in fact going to be
13 there overnight or whatever the case may be,
14 then we needed to get him off of their count.
15 So while I was verifying that, I said, you know
16 what, just go back and do it again just to make
17 sure. While I'm looking into this thing with
18 this dude. I didn't say that to them. I'm
19 thinking to myself. I'll have them go back and
20 do another count while I check on this inmate
21 that was -.

22 MR. [REDACTED]: There's a possibility the
23 count was wrong then.

24 MS. [REDACTED]: What do you mean?

25 MR. [REDACTED]: You said go back and verify

1 if the guy was still there or not there.

2 MS. [REDACTED]: I didn't say go back
3 and verify if the guy was still there. I said
4 while I verify what's going on with this guy in
5 R&D to see if he's still in R&D. That's what
6 I'm talking about. I wanted to verify if he
7 was still in R&D. And if he was, if he was
8 going to be staying there. Because I wasn't
9 aware that there was an inmate in R&D. So from
10 my own, and I wasn't verbalizing this. I was
11 saying this to myself.

12 MR. [REDACTED]: But the point being is
13 you got a count that was a 73 and you said do
14 it again. Correct?

15 MS. [REDACTED]: The count slip that
16 was 73 was broke down because they had put the
17 count slip out.

18 MR. [REDACTED]: Right. And you --

19 MS. [REDACTED]: So -

20 MR. [REDACTED]: -- asked them to do the
21 count again though. Because you got a count
22 slip - and this is where I just want to make
23 sure that we're all on the same page here. So
24 you did though, take action. You got a count
25 slip that seemed to be inaccurate and

1 questioned it. You said can you do the count
2 again.

3 MS. [REDACTED]: I hadn't even gotten
4 the count slip then.

5 MR. [REDACTED]: Oh, okay.

6 MS. [REDACTED]: Like I said, when
7 they called in the count, they said the count
8 like the count in the book or wherever they was
9 reading it from say 73 but there is an inmate
10 that's in R&D.

11 MR. [REDACTED]: So that's how they called
12 the count in? There's 73, but there's one
13 inmate in R&D. And you said, can you do the
14 count again?

15 MS. [REDACTED]: They wasn't even
16 really calling in the count. They was
17 questioning. You know, they were basically
18 informing me that we've got 73 -. Because they
19 weren't even sure what they should do or how
20 they should go about it.

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: You know. They just
23 wanted it to be known that there was an inmate
24 off their housing unit that was somewhere else.
25 He wasn't physically on the housing unit. And

1 that was the whole question as to how do they
2 want us to do - how are we supposed to count
3 this guy? What's the deal with that? So I'm
4 saying, you know, let me - I need to figure
5 this out. Because I wasn't - I didn't even
6 know that there was a guy in R&D at the time.
7 So I need to verify that there is a guy in R&D
8 and what's the status of this dude in R&D, why
9 he's there. All these questions I have to ask
10 before I can even tell them anything about it.

11 MR. [REDACTED]: So at what point would
12 have they filled out the count slip? After you
13 did the verification? Would have they then
14 created the count slip?

15 MS. [REDACTED]: They would have
16 created a new count slip.

17 MR. [REDACTED]: Okay. So -.

18 MS. [REDACTED]: And that count slip
19 apparently was never picked up because --

20 MR. [REDACTED]: Never picked up or not
21 recorded.

22 MS. [REDACTED]: -- because the one
23 that you all was able to get a copy of was the
24 73 and not the one that reflected the in count
25 which would have been 72.

1 MR. [REDACTED]: And do you know that
2 there was a count slip that was created?

3 MS. [REDACTED]: I have no reason to
4 believe that there wasn't.

5 MR. [REDACTED]: But do you have a reason
6 to believe that there was? Did you ever see
7 one?

8 MS. [REDACTED]: If I had saw it, it
9 would have been during the time that I would
10 have taken the count and I would have attached
11 it to the rest of the count slips and went on
12 about my business.

13 MR. [REDACTED]: So at the same time we're
14 saying to you there's no reason to believe that
15 there wasn't. there's also then no reason to
16 believe that there was.

17 MS. [REDACTED]: I - let me tell you -
18 .

19 MR. [REDACTED]: The point being is that
20 you don't know. You don't know if there was a
21 count slip.

22 MS. [REDACTED]: If -. Let me tell
23 you something. Based upon the fact that I've
24 worked with these guys for a certain period of
25 time and I know what they're capable of doing.

1 I can for the most part tell you what somebody
2 would do and what they wouldn't do. I have
3 never had a problem with a staff member not
4 correcting their count slip or not sending me
5 another - a corrected count slip.

6 MR. [REDACTED]: Now we're only asking you
7 because I have personally not seen it. So I'm
8 asking you if there's another one, do we need
9 to go try to find this. Or do you not know.

10 MS. [REDACTED]: You're not going to
11 find it. I mean it's two years later.

12 MR. [REDACTED]: Right.

13 MS. [REDACTED]: Where are you going
14 to find it at? If it wasn't picked up - I mean
15 the fact that they could have put it out there
16 and no one picked it up.

17 MR. [REDACTED]: Here's a question. If they
18 did do one, right, it's expected that they
19 should have for that one. Right. A new one.
20 Yes or no? Because of the error, it was
21 expected that they would have filled out a new
22 one with the correct number.

23 MS. [REDACTED]: I'm sure that they
24 filled that they filled out another one and
25 probably put it out in and it was an oversight

1 on somebody's part and they didn't pick it up.

2 MR. [REDACTED]: Yeah but here's the thing.
3 You don't know if - yes or no. Did you see it
4 for that? Yes or no.

5 MS. [REDACTED]: No. I didn't see
6 it.

7 MR. [REDACTED]: No-no. We're going that,
8 would it possibly have been picked up at the
9 3:00 a.m. count?

10 MS. [REDACTED]: I don't know when it
11 could have been picked up, sir.

12 MR. [REDACTED]: Is it in the same place? Or
13 is it a different place it's kept?

14 MS. [REDACTED]: Depending. I mean
15 they could have put it in the same place. They
16 could have put it in a different place. I
17 don't know.

18 MR. [REDACTED]: Okay. That's it. We just
19 want to know.

20 MR. [REDACTED]: I can't tell you something
21 that I didn't see. If I didn't see it, I can't
22 --

23 MR. [REDACTED]: And that's what --

24 MS. [REDACTED]: -- tell you where
25 they put it or who picked it up or what

1 happened to it.

2 MR. [REDACTED]: And that's what we're
3 getting at. The point being is that you're not
4 sure. So we just don't want to - because you
5 said you have no reason to believe that they
6 didn't. That indicates that they did. And we
7 just want to make sure that you're correct.
8 You've never seen it. You're actually not sure
9 if they did or not.

10 MS. [REDACTED]: Okay.

11 MR. [REDACTED]: Is that correct though?

12 MS. [REDACTED]: No. I never saw the
13 count slip.

14 MR. [REDACTED]: Okay. Perfect. I mean
15 it's not like a "gotcha," we just want to make
16 sure --

17 MR. [REDACTED]: Yeah.

18 MR. [REDACTED]: -- that you dint - there
19 isn't a count slip out there that we need to
20 try to go find.

21 MS. [REDACTED]: Let me tell you
22 something. It's -. If-if-if. I can't - if I
23 can make something right that's wrong or need
24 correcting, then that's what I'm here for. I'm
25 not here to like I said, and I'll say this a

1 thousand times. I'm not here to cover for
2 nobody. I'm not here to provide false answers
3 for something that somebody had done, but at
4 the same time, you all are throwing these
5 questions at me about what somebody would have
6 done. I don't know what's in somebody's mind -
7 -

8 MR. [REDACTED]: Ma'am, we're absolutely
9 not asking --

10 MS. [REDACTED]: -- with the stuff --

11 MR. [REDACTED]: -- those questions.
12 We're asking you --

13 MS. [REDACTED]: -- that's taken
14 place.

15 MR. [REDACTED]: We're saying did you see
16 it. So that's what we're trying to get you to
17 answer more like yes, no, hey I don't know on
18 that front. So we're trying to keep it
19 consolidated and ask you direct questions.
20 What did you know? Did you know if they did
21 another count slip?

22 MS. [REDACTED]: Well what I also know
23 is there's no reason for them to not have done
24 it. I've never had a reason or a circumstance
25 where somebody didn't do a corrected count

1 slip. I mean it's - there's really nothing to
2 it.

3 MR. [REDACTED]: And this is only because
4 of the way you're answering this. Should have
5 you ensured that they did a new count slip?

6 MS. [REDACTED]: I had no reason to.

7 MR. [REDACTED]: But was it your
8 responsibility to ensure that they created a
9 new count slip?

10 MS. [REDACTED]: It was my
11 responsibility to tell them. Well they knew to
12 create it. If the count was different, they
13 knew to create a new count slip. I'm not
14 required to wait around for that count slip to
15 manifest itself in SHU when I have a thousand
16 other duties to do.

17 MR. [REDACTED]: Okay.

18 MS. [REDACTED]: I leave that you
19 know.

20 MR. [REDACTED]: So it's your requirement
21 to do a new count but it's not your requirement
22 to follow up to obtain a new count slip.

23 MS. [REDACTED]: Because what
24 generally happens is that the internal officers
25 would go pick that count slip up and bring it

1 down to the control center. And they would
2 attach it to that count.

3 MR. [REDACTED]: And would have it then
4 been Noel or Thomas' responsibility to contact
5 internal to tell them to come get it? Or would
6 it have been your responsibility to tell
7 internal to?

8 MS. [REDACTED]: Sometimes I would
9 tell them. Sometimes SHU would tell them. It
10 just depends --

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: -- on the
13 circumstance.

14 MR. [REDACTED]: In this circumstance do
15 you know who would have been responsible for
16 that?

17 MS. [REDACTED]: I mean we all could
18 have done it.

19 MR. [REDACTED]: Okay.

20 MS. [REDACTED]: We all could have
21 done it.

22 MR. [REDACTED]: So when you say depending
23 on circumstance, in this --

24 MS. [REDACTED]: Well that was just
25 something I said. But any of us could have

1 done it. If control - if I see that control -.

2 MR. [REDACTED]: So let's get at it this
3 way. Did you contact internal?

4 MS. [REDACTED]: Let me tell you
5 something. If internal comes to the control
6 center, and I walk over there to drop off count
7 slips that they've already collected. And I
8 walk over there and I see them there. And I'll
9 say hey, can you go grab the new one from
10 South. That would be an example of a
11 circumstance.

12 MR. [REDACTED]: Okay. So in this
13 circumstance, did you contact internal and tell
14 them to get the new slip?

15 MS. [REDACTED]: I didn't contact --

16 MR. [REDACTED]: Okay.

17 MS. [REDACTED]: -- internal to tell
18 them.

19 MR. [REDACTED]: And are you aware if
20 Thomas and Noel contacted internal to come
21 collect a new slip?

22 MS. [REDACTED]: They may have. And I
23 may have -.

24 MR. [REDACTED]: But you're not aware?

25 MS. [REDACTED]: And control may have

1 announced it over the intercom. I can't
2 remember from --

3 MR. [REDACTED]: Sure.

4 MS. [REDACTED]: -- this year to that
5 one.

6 MR. [REDACTED]: You're not aware. Great.

7 MS. [REDACTED]: You know if that
8 actually occurred.

9 MR. [REDACTED]: Now you mentioned that an
10 all-staff email should have been put out that
11 Epstein had a requirement. Who should have put
12 that out?

13 MS. [REDACTED]: The person - the -.

14 MR. [REDACTED]: Was that psychology? The
15 warden? The captain? The AW?

16 MS. [REDACTED]: I mean they all
17 should have been doing it.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: To be honest with
20 you, they all should have known that he should
21 have been up on 10 South.

22 MR. [REDACTED]: Okay.

23 MS. [REDACTED]: But.

24 MR. [REDACTED]: Has an all-staff email
25 ever gone out before saying that this person is

1 on suicide watch. He's required to have an
2 email. I mean a cellmate.

3 MS. [REDACTED]: Here?

4 MR. [REDACTED]: Yes.

5 MS. [REDACTED]: I've never seen that.
6 I've never seen that done here. But we didn't
7 have -. I'm trying to remember a time when
8 prior to Epstein that I had even seen an email
9 period about an inmate needing an inmate in the
10 cell to be housed with another inmate. To be
11 honest with you.

12 MR. [REDACTED]: Okay. Now speaking to
13 that though, you know, we showed you the email
14 that was sent to you that you said you don't
15 recall ever receiving it. Do you have a lot of
16 emails that have gone unread?

17 MS. [REDACTED]: I'm sure I do.

18 MR. [REDACTED]: Okay. So yeah. You
19 didn't receive this but there's also a lot of
20 emails that you didn't receive --

21 MS. [REDACTED]: There's a lot of
22 emails that I received --

23 MR. [REDACTED]: -- and you probably
24 haven't --

25 MS. [REDACTED]: -- and haven't had

1 time to read at that time because of everything
2 that was going on during our shift and in this
3 building.

4 MR. [REDACTED]: And is that just a
5 constant issue of just trying to keep up with
6 emails as well as do your job?

7 MS. [REDACTED]: That was a constant
8 issue. Yes. Because there was so much going
9 on in this building at the time. So much
10 chaos. That you didn't have time to read.

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: You didn't have time
13 to read a lot of the emails that you'd gotten.
14 But most importantly, if when you're talking
15 about information that's that important, you
16 know. Whoever is sending out the information.
17 Whoever got the information should always be
18 trying to make sure that everybody knows that
19 this is important. We have to make sure that
20 he has a cellie because like I said, the
21 officers are the main ones who come in contact.

22 MR. [REDACTED]: And that goes back to our
23 original question.

24 MS. [REDACTED]: With the inmates.

25 MR. [REDACTED]: If the chain of command

1 went up to [REDACTED] during that time and that he
2 knew that he was required to have a cellmate
3 and didn't, what should have he done?

4 MS. [REDACTED]: If what?

5 MR. [REDACTED]: If you were the ops
6 lieutenant at the time, so put yourself into
7 the place of [REDACTED]. If you knew that Epstein
8 was required to have a cellmate, and his
9 current cellmate was removed, he should have -
10 and what you said was, I believe, he should
11 have notified the captain and ensured that a
12 cellmate was put in place.

13 MS. [REDACTED]: That's what I would
14 have done.

15 MR. [REDACTED]: Correct.

16 MS. [REDACTED]: I said [REDACTED] was the
17 SHU lieutenant at one point. So he probably
18 would have assigned another inmate to the cell.
19 It just depends on you as a supervisor.

20 MR. [REDACTED]: Sure.

21 MS. [REDACTED]: There is nothing
22 written in stone concerning how you're going to
23 - indicating how you're going to handle that
24 situation because -.

25 MR. [REDACTED]: And if the inmate that

1 was removed - [REDACTED] - was done at the end of
2 his shift, should have he then passed that
3 information on to the next operations
4 lieutenant to be able to handle the situation?

5 MS. [REDACTED]: That's if he knew
6 about it. But chances are, he probably would
7 have handled it --

8 MR. [REDACTED]: No, let's --

9 MS. [REDACTED]: -- himself before he
10 left.

11 MR. [REDACTED]: Okay.

12 MS. [REDACTED]: I can't --.

13 MR. [REDACTED]: So you think that --

14 MS. [REDACTED]: Look. I can't answer
15 for him.

16 MR. [REDACTED]: Sure.

17 MS. [REDACTED]: I don't know what he
18 should have done or what he would have done or
19 what --

20 MR. [REDACTED]: If it was --.

21 MS. [REDACTED]: -- he could have
22 done.

23 MR. [REDACTED]: -- as an ops lieutenant.
24 Do you think even if it happened at the end of
25 a shift, he should have handled it?

1 MS. [REDACTED]: I'm not saying what
2 he should have done.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: I'm saying -. Look.
5 What he should have done and what he could have
6 done and what he would have done is on him.

7 MR. [REDACTED]: Sure.

8 MS. [REDACTED]: We don't have - there
9 is no instruction or no instructional manual
10 that tells us every little thing that we're
11 supposed to be doing --

12 MR. [REDACTED]: Right.

13 MS. [REDACTED]: -- for every scenario
14 because it'll never happen.

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: You'll never have an
17 exact scenario for everything that happens.
18 You just have to use your common sense and good
19 judgment regarding it.

20 MR. [REDACTED]: So going back to what you
21 said about your hours aren't specific to what
22 the duty agent roster says. You said you would
23 work -. Although the roster says 12:00 a.m. to
24 8:00 a.m., you were actually 10:00 p.m. to 6:00
25 a.m. What would have [REDACTED] have been on August

1 9th. Looking at the duty roster. What times
2 would he have actually - have worked according
3 to that?

4 MS. [REDACTED]: I'm thinking he would
5 have worked -. he would have came in around
6 6:00 and worked until 2:00.

7 MR. [REDACTED]: Okay. So he would have
8 been 6:00 a.m. to 2:00 p.m.?

9 MS. [REDACTED]: Yes.

10 MR. [REDACTED]: And then [REDACTED] would
11 have been 2:00 p.m. to 10:00 p.m.?

12 MS. [REDACTED]: That's correct.

13 MR. [REDACTED]: Okay. If he didn't -.
14 If [REDACTED] didn't tell [REDACTED] that, would have
15 it then been the ultimate responsibility for
16 the COs to again report it up the chain of
17 command? Or because they reported it
18 previously, would that have covered them with
19 hey we got it up to the ops lieutenant. That
20 person's supposed to take care of it. Do you
21 follow what I'm saying? So for people working
22 in the SHU. They had already reported it up.
23 It got to [REDACTED]. At that point, is everybody
24 in the SHU covered? They reported it. Or
25 should each subsequent shift have also

1 reported, hey he's supposed to have an inmate -
2 he's supposed to have a cellmate in here. He
3 doesn't.

4 MS. [REDACTED]: That's if they knew.
5 There is no reason for me to believe that those
6 guys that was there on SHU that if they knew
7 that, whether or not before they left, I'm sure
8 they would have questioned that again as to
9 what you want me to do about this particular
10 situation.

11 MR. [REDACTED]: Okay. So should have
12 each -. So then let's say if Thomas and Noel
13 did know. And they knew he was without a
14 cellmate. Should have they then told you?
15 When you did your rounds? Like when they're
16 calling control. And you're stopping by at
17 4:00 a.m. Would have it been their
18 responsibility to say hey, just so you know,
19 he's required to have a cellmate and he
20 doesn't.

21 MS. [REDACTED]: I'm not going to say
22 that that's what they should have done because
23 there's no rules and regulations regarding
24 that. But they - I would have - if it was me,
25 I would have mentioned it.

1 MR. [REDACTED]: Okay. So even if they
2 know, somebody told them just make sure, he's
3 required to have a cellmate in SHU at that
4 point, they're not actually required to notify
5 someone.

6 MS. [REDACTED]: If what? If somebody
7 tells -?

8 MR. [REDACTED]: So you're saying that
9 there's no rules and -

10 MS. [REDACTED]: If who tells them
11 that?

12 MR. [REDACTED]: So if they are told. And
13 I'm not saying you did.

14 MS. [REDACTED]: You're saying -. Okay
15 so now you're saying if they knew that he was
16 supposed to have a cellie.

17 MR. [REDACTED]: Correct.

18 MS. [REDACTED]: Yeah. If they knew
19 the was supposed to have a cellie.

20 MR. [REDACTED]: If they knew -. Yeah.
21 So if they then because it was during their
22 shift. They should have at some point informed
23 you hey he's supposed to have a cellmate and he
24 doesn't. And they didn't do that. Correct?

25 MS. [REDACTED]: That's correct.

1 MR. [REDACTED]: Okay. Fair enough.

2 That's it. You done?

3 MR. [REDACTED]: (Indiscernible *02:48:29)

4 MR. [REDACTED]: What?

5 MR. [REDACTED]: Do you know of any -
6 currently, do you know of any policy violations
7 that's happening at the MCC?

8 MS. [REDACTED]: As far as what?

9 MR. [REDACTED]: For August 9th and 10th
10 or are you talking about --

11 MR. [REDACTED]: No-no-no. Just in general.

12 MR. [REDACTED]: -- just in general?

13 MR. [REDACTED]: In general. In general, do
14 you know of any policy violations or any kind
15 of violations happening here at the MCC?

16 MS. [REDACTED]: What I do know is
17 that there are people here who abuse their
18 power. They blame everybody for everything and
19 they expect everybody to members of
20 correctional services and to take on the
21 responsibilities of other departments when it's
22 clearly not their responsibility. You have a
23 lot of people that come here that really are
24 not versed on what it is they're supposed to be
25 doing - their responsibilities. So they pawn

1 that off on other people. But there's a -.
2 There's no clear and defined form of policy and
3 procedure here. There's no consistency that
4 goes on here. Everything is hodge-podge. A
5 lot of times, people are required to make
6 decisions off the cuff or to do -. Because
7 when you come here, if you don't have or while
8 you're here - or working here. There is no
9 formal guidance that teaches and guides staff
10 to know what they're supposed to be doing.
11 There's nothing written in stone regarding what
12 you're supposed to be doing and what you're
13 supposed to be doing on a daily basis. There
14 are post orders and stuff like that. But
15 they're not in depth enough to let staff know
16 this is what you're supposed to be doing.
17 There are a lot of things that - decisions that
18 people make off the cuff that's not ever put in
19 writing. And that they would tell whoever's
20 here at the time. And I guess expect that
21 information to get disseminated throughout the
22 institution. And it's not. That's not being
23 done. That's not being done. So you have a
24 lot of - we have a lot of new staff here. And
25 a lot of them are falling between the cracks

1 because they just aren't getting information to
2 them in a manner in which they should.

3 MR. [REDACTED]: On what you just mentioned.
4 So you're saying that there's orders or
5 decisions coming down from up above? And it's
6 not being properly communicated out.

7 MS. [REDACTED]: This is how. This is
8 how this place has always been. You -. People
9 in-in-in-in um positions will require the
10 people up under them to carry their load rather
11 than them carrying their own load. When if -
12 if I'm a lieutenant, my duties and
13 responsibilities and authority end at a certain
14 level. At that point, the captain and above
15 takes over. A lot of times, you don't see
16 that. They expect you to do your job and their
17 job as well. We can't -. There are certain
18 decisions that we can't make. If it was up to
19 me, Epstein would have been up on 10 South. So
20 those are the type of decisions where you tell
21 people that these things are wrong. You give
22 them intel about certain things. And here we
23 are. We done found a loaded gun in the
24 institution. That - those type things should
25 never happen. Never happen.

1 MR. [REDACTED]: That's all I have.

2 MR. [REDACTED]: Anything else?

3 MR. [REDACTED]: Nope.

4 MS. [REDACTED]: You have Thomas and
5 Noel that were left holding the bag for
6 something that, for a decision that should have
7 been made by the staff way above their level in
8 regard to Epstein and what was best for him
9 during his time here. It may not have saved
10 his life, but we certainly would have been in a
11 better position if he had decided to take it
12 somewhere.

13 MR. [REDACTED]: But do you agree that
14 counts and rounds need to be conducted? If
15 people are falsifying counts and rounds -?

16 MS. [REDACTED]: I'm not. I don't
17 know anything about --

18 MR. [REDACTED]: If --.

19 MS. [REDACTED]: -- people falsifying
20 counts --

21 MR. [REDACTED]: But if --

22 MS. [REDACTED]: -- but yes --

23 MR. [REDACTED]: -- they were.

24 MS. [REDACTED]: -- counts and rounds
25 need to be done. They're important.

1 MR. [REDACTED]: Right. And if they were
2 aware that there was a cellmate requirement,
3 they should have reported the matter to someone
4 like yourself.

5 MS. [REDACTED]: Yeah, but you have
6 other people that are - were responsible for
7 disseminating that information to -

8 MR. [REDACTED]: Okay.

9 MS. [REDACTED]: -- everybody to make
10 sure that everybody had that information. And
11 everybody knew that.

12 MR. [REDACTED]: Right. And that --

13 MS. [REDACTED]: And they also had -.

14 MR. [REDACTED]: -- I guess like yourself,
15 you received an email but you didn't read it.
16 So that's where there's one of those things
17 that yeah, there's definitely things to work
18 out. But I'm just saying when you say, like
19 there are things that sound like they were
20 probably done wrong here like counts and rounds
21 aren't being conducted. People aren't
22 reporting information up the chain if they're
23 being told to do so. But as well as everything
24 else, you're saying as an institution.

25 MS. [REDACTED]: When I first came

1 into the Bureau, you didn't even have email.
2 So how was - and you still now is no different
3 than back then. You still have inmates who was
4 with in potential danger. The same situations
5 that existed in the institutions then. It's
6 the same instances that exist now. So if back
7 then they were able to make sure everybody was
8 on the same page and that information was
9 disseminated and it got to everybody. Why
10 should it be any different here? You can't
11 rely on an inmate because first of all, in
12 order to know, you don't just send out. That's
13 the whole purpose of walking and talking. To
14 disseminate information that way. Because
15 you're never guaranteed that when you send out
16 an email that somebody is going to read it. I
17 have a ton of emails on my computer at home
18 that I don't read. So nothing is guaranteed.
19 You have to know. When you're in charge and
20 you're running something, you-you-you-you need
21 to know that whatever you put out there, that
22 if it's that important, if it's that important,
23 why are you sending it through an email anyway.
24 Why aren't you calling somebody on the phone?
25 Back it up. Call people on the phone. Make

1 sure everybody knows.

2 MR. [REDACTED]: I think the purpose is to
3 put it in writing. But yeah, so email but also
4 verify verbally.

5 MS. [REDACTED]: You need to verify
6 that if you're sending those emails to
7 pertinent people who should have access to that
8 information that everybody knows about it.

9 MR. [REDACTED]: Do you all have all staff
10 like where lieutenants are all present where
11 they can verbalize something to you? Is that
12 done here?

13 MS. [REDACTED]: Do we have what?

14 MR. [REDACTED]: So you're saying that not
15 only an email but people should verbalize it.
16 But there's a ton of people that need to know
17 things. So is there a process in place where
18 someone like the captain, say? If the warden
19 tells the captain make sure he has a cellmate,
20 is there a process in place where the captain
21 can get in front of all the lieutenants and
22 tell them this? Or is that - is there -?

23 MS. [REDACTED]: The captain has
24 access to every lieutenant here. The captain's
25 office is -.

1 MR. [REDACTED]: But how would he go about
2 verbalizing? Would he have to tell each
3 individual lieutenant?

4 MS. [REDACTED]: He should.

5 MR. [REDACTED]: So each --

6 MS. [REDACTED]: If it's that
7 important.

8 MR. [REDACTED]: -- lieutenant he needs to
9 specifically tell? And were you - being the
10 ops lieutenant - were you one of the people he
11 should have specifically told?

12 MS. [REDACTED]: He should have told
13 all of us. Not just time. He should have told
14 all of us.

15 MR. [REDACTED]: SO if you were -.

16 MS. [REDACTED]: Um, psychology should
17 have made sure that we all knew that.

18 MR. [REDACTED]: And this goes to like
19 since you didn't know. You have an email but
20 no one verbalized it. Who should have told
21 you? Whose ultimate responsibility do you
22 believe it was that hey that's the position
23 that really should have informed me. I'm the
24 ops lieutenant. I should have known that he
25 needed an inmate. Who was the person that

1 should have told you that verbally?

2 MS. [REDACTED]: Everybody who had
3 stake in making sure.

4 MR. [REDACTED]: But you relay believe
5 that every single one of those persons should
6 have verbally told you this?

7 MS. [REDACTED]: They should have made
8 sure that enough people knew whereby everybody
9 should have known.

10 MR. [REDACTED]: So this is what we talked
11 about. Everybody did know but you. So who
12 should have told you?

13 MS. [REDACTED]: No.

14 MR. [REDACTED]: The lieutenants. The
15 lieutenants --

16 MS. [REDACTED]: Everybody didn't
17 know.

18 MR. [REDACTED]: -- that were involved
19 here all knew that he was required to have an
20 inmate. You're the only one who said that you
21 didn't know. So my question to you is they all
22 knew. Who should have been the one to tell
23 you?

24 MS. [REDACTED]: The same people that
25 told them. Just because they read the email

1 doesn't mean that before they read the email,
2 they wasn't aware.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: I mean that doesn't
5 say that.

6 MR. [REDACTED]: No. I do believe that
7 most of these people were told verbally. So
8 that's what I'm saying. Who should have
9 verbally told you?

10 MS. [REDACTED]: Who verbally told
11 them?

12 MS. [REDACTED]: So whoever verbally
13 told them should have verbally told you?

14 MS. [REDACTED]: I mean -.

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: A number of -.
17 You've got -. Psychology has a stake --

18 MR. [REDACTED]: Sure.

19 MS. [REDACTED]: -- in whether or not
20 he has a cellie. Right?

21 MR. [REDACTED]: Do you understand what
22 I'm saying? I'm saying like psychology, the
23 captain, the warden, the AW. They can't all
24 tell you the same thing. It should be one
25 person. I'm assuming that should have told

1 you.

2 MS. [REDACTED]: There's never one
3 person that disseminates information. That's
4 how we all know what happens here. When you
5 don't have one person -.

6 MR. [REDACTED]: Okay.

7 MS. [REDACTED]: One person that would
8 mean that that one person would have to work
9 every shift to let everybody know what's going
10 on. But if you see me here, and you know that
11 that's important. Then you should at least
12 make the effort to make sure hey, did you know?

13 MR. [REDACTED]: Right.

14 MS. [REDACTED]: I mean we're not -.

15 MR. [REDACTED]: And being that the
16 captain doesn't work when you work at nights
17 especially. It sounds like from July 30th to
18 the time that this happened.

19 MR. [REDACTED]: At some point in time.

20 MR. [REDACTED]: So would that have been
21 the other ops lieutenant? His requirement to
22 tell you.

23 MS. [REDACTED]: At some point in
24 time. I'm sure. The captain seen me between
25 July 30th and every day at some point

1 thereafter.

2 MR. [REDACTED]: Okay. So by saying the
3 captain, does that mean you believe the captain
4 is the one who should have told you that?

5 MS. [REDACTED]: If the captain knew,
6 the captain should have made sure that we knew.

7 MR. [REDACTED]: Okay.

8 MS. [REDACTED]: You know, there's a -
9 there's a - there's a - there's a chain.

10 MR. [REDACTED]: And that's my question is
11 who is that chain of command? Who was
12 responsible for letting you know? The captain?

13 MS. [REDACTED]: If he knew.

14 MR. [REDACTED]: Okay. So -.

15 MS. [REDACTED]: He should have
16 ensured. He should have made sure that we all
17 knew.

18 MR. [REDACTED]: Alright.

19 MS. [REDACTED]: That we were aware of
20 that information. That we knew.

21 MR. [REDACTED]: So the person that should
22 have told you is the captain? That's what I'm
23 getting at.

24 MS. [REDACTED]: Whoever was
25 responsible for ensuring that inmate's safety

1 and wellbeing. Whoever had a stake in that
2 should have been making sure that everybody
3 knew. Whether it was the warden making sure or
4 the AQ.

5 MR. [REDACTED]: Sure. So if the warden
6 contacted the captain and told the captain hey
7 make sure all your lieutenants know -.

8 MS. [REDACTED]: Whether it was the
9 warden telling the AOs, the AOs telling the
10 captains and telling them to tell us.

11 MR. [REDACTED]: But the person above you.
12 So let's say. Take this as like what I'm
13 telling you.

14 MS. [REDACTED]: It could have been -.
15 It could have been another officer, sir, that
16 knew and didn't.

17 MR. [REDACTED]: Okay. And that's my
18 question.

19 MS. [REDACTED]: And could have said
20 hey.

21 MR. [REDACTED]: So in this instance, if
22 the warden told the captain, the captain you
23 know telling the lieutenants. Should have it
24 been both your relieving ops lieutenant as well
25 as the captain are the ones that should have

1 been telling you this?

2 MS. [REDACTED]: Which one? Which
3 relieving?

4 MR. [REDACTED]: Well in this case it
5 would have been [REDACTED].

6 MS. [REDACTED]: I mean, but you said
7 the email came out on July 30th.

8 MR. [REDACTED]: Sure. But I'm saying -.

9 MS. [REDACTED]: So it could have been
10 anybody between --

11 MR. [REDACTED]: But then to back up
12 [REDACTED] --

13 MS. [REDACTED]: -- then forward.

14 MR. [REDACTED]: -- [REDACTED] should have told
15 [REDACTED]. [REDACTED] told you. Or should have the
16 captain told all three?

17 MS. [REDACTED]: We should have had -
18 we should have known that way, way before that
19 day.

20 MR. [REDACTED]: Well they did know.

21 MS. [REDACTED]: Okay.

22 MR. [REDACTED]: And so that's my question
23 is for you.

24 MS. [REDACTED]: Okay.

25 MR. [REDACTED]: So they knew, the captain

1 knew. The warden knew. You didn't know. Who
2 should have told you? Should have your
3 relieving ops lieutenants told you? Or should
4 have your captain told you?

5 MS. [REDACTED]: Whoever knew that day
6 that he was left without a cellie. And who
7 came in contact with me should have, you know.

8 MR. [REDACTED]: Okay. So the highest
9 level basically the highest officer. So if
10 [REDACTED] knew it would have been - and he didn't
11 tell the captain, it would have been his
12 responsibility to either told the captain and
13 the ops lieutenant next to him. And that ops
14 lieutenant should have told the captain or you.
15 The point being the information never go to
16 you.

17 MS. [REDACTED]: I never was told.

18 MR. [REDACTED]: Sure. No. And that's
19 why.

20 MS. [REDACTED]: I never was told that
21 he didn't have a cellie on that day.

22 MR. [REDACTED]: Okay.

23 MS. [REDACTED]: But as far as what
24 somebody supposed to do is clearly left up to
25 that individual and what their knowledge is and

1 how much they know. How long they've been on
2 the job and how well they do their job and so
3 forth and so on.

4 MR. [REDACTED]: Okay.

5 MS. [REDACTED]: All of us don't
6 necessarily handle things all the same way.
7 We're not all - we don't all think alike. We
8 don't share the same brain. So how one person
9 handle it is not necessarily how somebody else
10 would have handled it. But -.

11 MR. [REDACTED]: Sure. But everybody has
12 their duties and responsibilities. And that's
13 it.

14 MS. [REDACTED]: That's correct.

15 MR. [REDACTED]: Alright.

16 MR. [REDACTED]: Just one left. In regard to
17 August 9th and 10th. Is there anything that we
18 forgot that we didn't ask or that you think we
19 should have asked about? Any important details
20 that we might have missed?

21 MS. [REDACTED]: Concerning Epstein?

22 MR. [REDACTED]: Concerning Epstein.

23 MR. [REDACTED]: No.

24 MR. [REDACTED]: Okay.

25 MS. [REDACTED]: Not that I can think

1 of.

2 MR. [REDACTED]: That's it.

3 MR. [REDACTED]: Alright. It is currently
4 12:39 p.m. on June 14, 2021. This is Senior
5 Special Agent [REDACTED] and I am
6 turning of the recorder.

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CERTIFICATE

I hereby certify that the foregoing pages represent an accurate transcript of the electronic sound recording of the proceedings before the Department of Justice, Office of the Inspector General in the matter of:

Interview of [REDACTED]

[REDACTED]

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