

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 [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 their 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 official DOJ OIG  
16 investigation into the death of inmate Jeffrey  
17 Epstein and everything in response 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], Brooklyn, New York  
10 11209.

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]: December 11, 1994.

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

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

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 [REDACTED].

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 [REDACTED].

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 [REDACTED]. 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 lateral 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 leave around 10:00  
25 and then we got off - we got relieved at around

1 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 December 11, 1994 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 [REDACTED] 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] how  
2 account 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 key 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 south. 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 sat 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 internal.

13 MR. [REDACTED]: Do you remember who was an  
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 she  
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],  
17 would have been the control number one officer.  
18 It seems like it appears. And [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 a

1 date. And then you can just circle the name of  
2 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.

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

11 MS. [REDACTED]: Okay.

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

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

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

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

22 MS. [REDACTED]: Midnight. Yeah.

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

25 MR. [REDACTED]: 8:00 a.m. The same shift

1 that you were on.

2 MR. [REDACTED]: Yeah.

3 MS. [REDACTED]: Okay. So I'm looking  
4 at the assignment roster for Saturday, August  
5 10, 2019. The control number one officer was  
6 Ms. [REDACTED] who is non-custody. She works in  
7 the R&D - Receiving and Discharge department  
8 for - she was on overtime. For day watch,  
9 control number one is Officer [REDACTED]. Control  
10 number two is Officer [REDACTED] (Phonetic Sp.  
11 \*00:27:07) who was on overtime. For evening  
12 watch, in the control one position there was  
13 Officer [REDACTED] and control two was Officer  
14 [REDACTED] who was also non-custody.

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

21 MS. [REDACTED]: Typically -.

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

25 MS. [REDACTED]: Well the officers

1 were working those hours.

2 MR. [REDACTED]: Okay.

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

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

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

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

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

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

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

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

5 MR. [REDACTED]: Okay.

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

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

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

12 MR. [REDACTED]: Okay.

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

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

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

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

24 MS. [REDACTED]: Wait a minute.

25 MR. [REDACTED]: So that's so yeah. Let's

1 say for instance the 12:00 p.m. count, the 3:00  
2 a.m. count, and the 5:00 a.m. count. Who would  
3 have been called then on August 10th?

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

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

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

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

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

25 MR. [REDACTED]: Okay.

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

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

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

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: Because on morning  
11 watch, it look like there was two. But I'm  
12 trying to remember at that time if um -.  
13 Because sometimes the internal two would assist  
14 control because there were other things that  
15 needed to be done. But you have for internal  
16 there on morning watch there was Officer [REDACTED]  
17 and Officer [REDACTED] (Phonetic Sp. \*00:31:14) who  
18 was on overtime. Officer [REDACTED] was on overtime  
19 for midnight to 8:00. So between those two,  
20 they would have been picking up the count  
21 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 alive.  
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 back on the  
6 schedule, what is that showing? What time did  
7 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 eh 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 then 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]: Michael 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]. (Phonetic Sp. \*00:49:19).

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]  
19 (Phonetic Sp. \*00:51:28).

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

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

24 MS. [REDACTED]: Okay.

25 MR. [REDACTED]: If you recall if you had a

1 conversation with any of these people in regard  
2 to Epstein and Epstein needing a cellmate.

3 MS. [REDACTED]: Okay.

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

6 MS. [REDACTED]: Okay.

7 MR. [REDACTED]: Captain [REDACTED].  
8 Lieutenant [REDACTED]. Lieutenant [REDACTED]  
9 [REDACTED].

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

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

16 MS. [REDACTED]: No.

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

19 MS. [REDACTED]: No.

20 MR. [REDACTED]: Lieutenant [REDACTED].

21 MS. [REDACTED]: No.

22 MR. [REDACTED]: Lieutenant [REDACTED].

23 MS. [REDACTED]: No.

24 MR. [REDACTED]: Lieutenant [REDACTED].

25 MS. [REDACTED]: No.

1 MR. [REDACTED]: Lieutenant [REDACTED].  
2 MS. [REDACTED]: No.  
3 MR. [REDACTED]: Lieutenant [REDACTED].  
4 MS. [REDACTED]: No.  
5 MR. [REDACTED]: Now following that I have a  
6 few more names. The rest are correctional  
7 officers. Same thing. Have you had any  
8 conversations with them about Epstein requiring  
9 a cellmate? CO [REDACTED].  
10 MS. [REDACTED]: No.  
11 MR. [REDACTED]: CO [REDACTED].  
12 MS. [REDACTED]: No.  
13 MR. [REDACTED]: If I mispronounce the name,  
14 please correct me. CO [REDACTED].  
15 MS. [REDACTED]: No.  
16 MR. [REDACTED]: CO Michael Thomas.  
17 MS. [REDACTED]: No.  
18 MR. [REDACTED]: CO Tova Noel.  
19 MS. [REDACTED]: No.  
20 MR. [REDACTED]: CO [REDACTED].  
21 MS. [REDACTED]: No.  
22 MR. [REDACTED]: CO [REDACTED].  
23 MS. [REDACTED]: No.  
24 MR. [REDACTED]: CO [REDACTED].  
25 MS. [REDACTED]: [REDACTED]? [REDACTED]?

1 MR. [REDACTED]: Yeah.

2 MS. [REDACTED]: No.

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

4 [REDACTED]?

5 MS. [REDACTED]: No.

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

7 aware of Inmate Efren Reyes being removed from

8 the MCC? Efren Reyes. Do you know who Efren

9 Reyes is?

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

11 that is.

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

13 Epstein's cellmate?

14 MS. [REDACTED]: When?

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

16 came back from suicide watch?

17 MS. [REDACTED]: No.

18 MR. [REDACTED]: Okay.

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

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

21 when he came back. Are you -?

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

23 had one or not.

24 MR. [REDACTED]: Okay.

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

1 know if he had a cellmate or not to be honest  
2 with you. No.

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

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

11 MR. [REDACTED]: Okay.

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

16 MR. [REDACTED]: Okay.

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

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

1 MS. [REDACTED]: I would expect for  
2 psychology to follow-up with us. I would  
3 expect for definitely the captain to get with  
4 us individually and tell us.

5 MR. [REDACTED]: Okay.

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

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

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

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

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

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

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

23 MS. [REDACTED]: Okay.

24 MR. [REDACTED]: And he was required -  
25 according to psychology - he was required to

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

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

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

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

22 MR. [REDACTED]: Yes.

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

25 MR. [REDACTED]: And so we don't have to

1 go back and circle back to this. Not only - so  
2 if he's naming a name, say what action should  
3 have they taken and who should have told them  
4 the information with regard to the need to have  
5 a cellmate.

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

8 MR. [REDACTED]: Sure.

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

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

13 MR. [REDACTED]: So this is the August  
14 9th. I'll give you that one first.

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

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

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

24 MS. [REDACTED]: Mm.

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

1 [REDACTED].

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

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

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

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

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

19 MR. [REDACTED]: Okay.

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

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

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

19 MR. [REDACTED]: Okay.

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

24 MR. [REDACTED]: Okay. Assuming that the CO -  
25 . Let's start with the COs. Assuming the COs

1 in the SHU knew that this was a requirement.  
2 In day watch. If he was removed at 8:30, who  
3 is responsibility would it have been to notify  
4 upwards?

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

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

12 MS. [REDACTED]: On -?

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

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

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

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

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

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

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

10 MR. [REDACTED]: Called who?

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

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

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

25 MR. [REDACTED]: Okay.

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

12 MR. [REDACTED]: Who would you have - seek  
13 guidance from?

14 MS. [REDACTED]: Me?

15 MR. [REDACTED]: Yeah.

16 MS. [REDACTED]: As a lieutenant?

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

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

22 MR. [REDACTED]: Okay.

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

1 forward?

2 MR. [REDACTED]: Okay.

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

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

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

12 MR. [REDACTED]: Yeah.

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

19 MR. [REDACTED]: Okay.

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

1 MR. [REDACTED]: How soon should have an  
2 inmate been assigned to that cell? Normally,  
3 what's the procedure? How soon after would  
4 they -?

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

7 MR. [REDACTED]: Okay.

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

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

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

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

16 MS. [REDACTED]: Okay.

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

22 MS. [REDACTED]: Yes.

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

1 MS. [REDACTED]: I don't remember what  
2 rounds.

3 MR. [REDACTED]: Okay.

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

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

9 MS. [REDACTED]: Yeah. Yeah.

10 MR. [REDACTED]: Mid-morning?

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

14 MR. [REDACTED]: No problem.

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

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

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

21 MS. [REDACTED]: Yes. Overnight.

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

25 MS. [REDACTED]: Yeah. Probably.

1 That sounds about right.

2 MR. [REDACTED]: Okay.

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

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

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

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

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

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

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

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

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

1 round? I mean what are they -?

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

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

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

17 MR. [REDACTED]: Okay.

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

24 MR. [REDACTED]: Okay. I want to take a quick  
25 detour. I'm going to show you two documents.

1 Can you show me what that is a map of?

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

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

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

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

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

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

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

14 MR. [REDACTED]: Two tiers.

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

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

21 MS. [REDACTED]: Mm-hmm.

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

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

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

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

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

8 MS. [REDACTED]: It says August 10,  
9 2019 at 12:35 --

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

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

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

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

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

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

22 MR. [REDACTED]: What alphabets?

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

1 72.

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

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

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

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

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

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

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

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

23 MR. [REDACTED]: Okay.

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

1 MR. [REDACTED]: Okay.

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

5 MR. [REDACTED]: Was -?

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

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

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

23 MR. [REDACTED]: Okay.

24 MS. [REDACTED]: So inmates are  
25 theoretically are not supposed to be staying -

1 spending the night down there.

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

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

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

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

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

15 MS. [REDACTED]: RA.

16 MR. [REDACTED]: RA?

17 MS. [REDACTED]: Yes.

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

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

25 MR. [REDACTED]: Yeah.

1 MS. [REDACTED]: When this - um.  
2 Their count was originally 73. But then you  
3 have an inmate in RA from special housing.

4 MR. [REDACTED]: Okay.

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

10 MR. [REDACTED]: Okay.

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

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

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

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

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

1 realized that something wasn't right. So  
2 that's how we got around to there's an inmate  
3 in R&D. You know that's being housed down  
4 there on watch. You know. That's how we got to  
5 that. So it's like oh, so there's an inmate in  
6 R&D. You know. And then you start asking  
7 questions. Why is he there? What's the deal  
8 with him? Because none of this information was  
9 passed down.

10 MR. [REDACTED]: Okay.

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

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

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

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

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

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

25 MS. [REDACTED]: They should have

1 gotten 72. But what I'm telling you is when  
2 this count was done, they were counting this  
3 inmate that was in R&D on that count because no  
4 one had told them that the inmate was actually  
5 somewhere else. And he was being counted in  
6 that area. So they were logging -. So what I  
7 understand - and that's how they understood it.  
8 That that inmate was being carried on to their  
9 count.

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

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

22 MR. [REDACTED]: Okay.

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

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

10 MR. [REDACTED]: Okay.

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

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

20 MS. [REDACTED]: Yes.

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

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

1 together.

2 MR. [REDACTED]: Okay.

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

7 MR. [REDACTED]: Okay.

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

12 MR. [REDACTED]: Okay.

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

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

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

1 someone said how is this 73 if you guys only  
2 have 72?

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

8 MR. [REDACTED]: Okay. So they knew that  
9 when they called in the count? It wasn't like  
10 --

11 MS. [REDACTED]: I mean --

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

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

15 MR. [REDACTED]: -- hey we've got 73 and -  
16 -

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

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

20 MS. [REDACTED]: No.

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

23 MS. [REDACTED]: No-no-no-no-no. When  
24 they called in the count, they was like I have  
25 73 but one of the inmates up here is in R&D.

1 MR. [REDACTED]: So they knew that there  
2 was only 72 in SHU at the time. They made note  
3 of the fact --

4 MS. [REDACTED]: Right because -.

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

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

10 MR. [REDACTED]: Sure.

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

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

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

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

17 MS. [REDACTED]: No.

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

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

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

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

1 said I have 72.

2 MR. [REDACTED]: So that's a good answer.

3 So he - so Thomas is the one who called that  
4 count? Rather than Noel?

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

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

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

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

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

14 MR. [REDACTED]: Okay.

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

25 MR. [REDACTED]: Okay. And you

1 specifically recall that?

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

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

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

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

9 MS. [REDACTED]: Right.

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

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

14 MR. [REDACTED]: Okay.

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

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

25 MS. [REDACTED]: I told them to do a

1 new count. Just to make sure.

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

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

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

10 MS. [REDACTED]: Right.

11 MR. [REDACTED]: Okay.

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

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

22 MS. [REDACTED]: Right.

23 MR. [REDACTED]: Okay.

24 MS. [REDACTED]: And to be honest with  
25 you, I'm giving myself some time so that I can

1 figure out whether or not -. I want to know  
2 whether or not this guy is actually in SHU.

3 MR. [REDACTED]: Sure.

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

11 MR. [REDACTED]: Sure.

12 MS. [REDACTED]: There.

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

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

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

25 MS. [REDACTED]: We are not required

1 to go to each individual cell and look at the  
2 inmates. When we make rounds, we get with the  
3 officers. We make sure that -. I mean if we  
4 choose to do that we can. But -.

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

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

13 MR. [REDACTED]: Sure.

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

1 MR. [REDACTED]: So are you supposed to  
2 though? So if they do a count, are you  
3 supposed to do a count with them during your  
4 shift?

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

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

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

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

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

20 MR. [REDACTED]: Okay.

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

24 MR. [REDACTED]: Sure.

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

1 MR. [REDACTED]: But for this instance,  
2 specifically, I'm talking about the 12:00 a.m.  
3 count, a 3:00 a.m. count, and a 5:00 a.m.  
4 count. Is there any requirement for any  
5 lieutenants that are in that you have oversight  
6 over the SHU to do a count with them?

7 MS. [REDACTED]: No.

8 MR. [REDACTED]: No.

9 MS. [REDACTED]: No.

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

12 MS. [REDACTED]: No.

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

15 MS. [REDACTED]: No.

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

18 MS. [REDACTED]: Our -.

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

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

1 count.

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

4 MS. [REDACTED]: This is the one count  
5 -.

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

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

11 MR. [REDACTED]: Okay.

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

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

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

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

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

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

1 MS. [REDACTED]: Right.

2 MR. [REDACTED]: Gotcha.

3 MS. [REDACTED]: Right. Right.

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

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

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

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

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

11 MS. [REDACTED]: I don't know if I  
12 probably was here doing --

13 MR. [REDACTED]: But not participating.

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

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

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

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

1 MS. [REDACTED]: I have no - I can't  
2 answer that. I don't know.

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

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

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

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

13 MR. [REDACTED]: 73?

14 MS. [REDACTED]: Mm-hmm.

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

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

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

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

1 Something -.

2 MR. [REDACTED]: Okay.

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

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

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

11 MR. [REDACTED]: R&D?

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

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

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

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

1 on?

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

5 MR. [REDACTED]: What about?

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

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

18 MR. [REDACTED]: To do what?

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

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

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

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

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

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

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

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

22 MR. [REDACTED]: No problem.

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

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

25 MS. [REDACTED]: Okay.

1 MR. [REDACTED]: So I'm going to show you.  
2 This is just for clarification purposes, just  
3 for our records. I'm going to show you one  
4 more document. What is F?

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

7 MR. [REDACTED]: Okay. And that should be the  
8 4:00 p.m. count?

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

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

13 MS. [REDACTED]: What?

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

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

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

20 MS. [REDACTED]: Well....

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

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

1 housing units from these areas - the different  
2 areas that are designated here.

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

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

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

10 MS. [REDACTED]: Um, 75.

11 MR. [REDACTED]: 75?

12 MS. [REDACTED]: Yes.

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

15 MS. [REDACTED]: Zero.

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

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

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

24 MS. [REDACTED]: Okay.

25 MR. [REDACTED]: Um.... On August 10th.

1 Right. When did you go to the SHU?

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

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

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

8 MR. [REDACTED]: Initial.

9 MS. [REDACTED]: Which one?

10 MR. [REDACTED]: All of them.

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

12 MS. [REDACTED]: Okay.

13 MR. [REDACTED]: I'll take that. When did you  
14 -? Did you make a round into the SHU on August  
15 10th?

16 MS. [REDACTED]: Yes.

17 MR. [REDACTED]: What time?

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

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

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

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

1 MS. [REDACTED]: Yes. Thomas and  
2 Noel.

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

4 MS. [REDACTED]: Yes.

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

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

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

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

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

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

1 MR. [REDACTED]: Okay.

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

5 MS. [REDACTED]: Right.

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

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

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

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

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

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

1 MYM all.

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

4 MS. [REDACTED]: Yeah-yeah.

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

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

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

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

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

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

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

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

25 MS. [REDACTED]: You mean specific

1 officers? Specific staff? Because I can  
2 assure you that's not all of them.

3 MR. [REDACTED]: That's not all of them.  
4 Yeah. So I don't know how they actually chose  
5 it. But you said you know you were on it but  
6 you don't recall receiving it.

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

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

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

19 MR. [REDACTED]: Okay.

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

1 too much.

2 MR. [REDACTED]: Sure.

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

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

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

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

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

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

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

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: When all of this  
23 happened, it of course later came out that he  
24 had a cellmate and the inmate was removed. But  
25 as far as me having personal knowledge of

1 whether or not he had a cellmate, I didn't know  
2 if he had a cellmate or not. I assumed he had  
3 a cellmate.

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

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

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

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

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

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

22 MR. [REDACTED]: But somebody - psychology  
23 I guess made the note. So is it the person  
24 that's on the email, this [REDACTED]?  
25 (Phonetic Sp. \*01:39:47) Should have she gone

1 around and aside from sending this email should  
2 have she spoken to people or had a meeting?  
3 What should have happened?

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

11 MR. [REDACTED]: Sure.

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

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

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

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

25 MS. [REDACTED]: If he had a cellmate

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

6 MR. [REDACTED]: Sure.

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

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

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

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

17 MR. [REDACTED]: Yes.

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

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

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

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

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

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

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

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

22 MR. [REDACTED]: So should have the  
23 captain told you that? Should have the person  
24 who relieved you that day? Should have that  
25 person told you? Hey just so you know, Epstein

1 doesn't have a cellmate.

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

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

13 MS. [REDACTED]: You relieved him.

14 MS. [REDACTED]: Yeah. I would have -  
15 .

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

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

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

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

1 MR. [REDACTED]: But this was August 9th.  
2 And you started August 10th, 12:00 a.m.  
3 MS. [REDACTED]: Right. So that would  
4 have been evening watch of -.  
5 MR. [REDACTED]: You would have relieved  
6 him. Correct.  
7 MS. [REDACTED]: Right. I would have  
8 relieved him.  
9 MR. [REDACTED]: And so should have he  
10 told you?  
11 MS. [REDACTED]: I would - I mean -.  
12 MR. [REDACTED]: How would then -? Or  
13 should have -? [REDACTED] would have been gone.  
14 So I'm assuming he would have been the one?  
15 MS. [REDACTED]: Let me tell you  
16 something. In the real world in a real  
17 institution that was running in the manner in  
18 which it should.  
19 MR. [REDACTED]: Sure.  
20 MS. [REDACTED]: Sure. That would  
21 have --  
22 MR. [REDACTED]: And you're not saying --  
23 MS. [REDACTED]: -- occurred.  
24 MR. [REDACTED]: -- that he did anything  
25 wrong.

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

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

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

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

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

9 MR. [REDACTED]: Yeah.

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

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

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

15 MR. [REDACTED]: Right.

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

19 MR. [REDACTED]: Mm-hmm.

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

24 MR. [REDACTED]: Sure.

25 MS. [REDACTED]: We were here when we

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

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

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

18 MR. [REDACTED]: Right.

19 MS. [REDACTED]: You would be hell-  
20 bent to stay abreast of every little thing that  
21 was going on. You just -. When your relief  
22 came, you know, you was like let me get some  
23 fresh air.

24 MR. [REDACTED]: Just let me -. In this  
25 circumstance. We're going to try to reign it

1 in specifically to -.

2 MS. [REDACTED]: If everything was  
3 going fine --

4 MR. [REDACTED]: So how -.

5 MS. [REDACTED]: -- and on a good day.  
6 Yes.

7 MR. [REDACTED]: Say he was - Reyes -  
8 Epstein's inmate was released you know sometime  
9 between 8:00 and 2:00. So I'm assuming the way  
10 it should have worked is the CO should have  
11 notified a lieutenant. The lieutenant maybe  
12 should have notified the ops lieutenant. The  
13 ops lieutenant should have notified the  
14 captain. Is that the way it should have worked  
15 in a perfect world?

16 MS. [REDACTED]: It depends on who is  
17 here.

18 MR. [REDACTED]: But should -. So --

19 MS. [REDACTED]: I'm saying that's --

20 MR. [REDACTED]: -- that's why we're  
21 looking at the 9th.

22 MS. [REDACTED]: -- what I would have  
23 done.

24 MR. [REDACTED]: Right.

25 MS. [REDACTED]: I can't tell you what

1 somebody --

2 MR. [REDACTED]: Because - but would that

3 --

4 MS. [REDACTED]: -- else would have  
5 done.

6 MR. [REDACTED]: -- be standard operating  
7 procedure? That's the way it works?

8 MS. [REDACTED]: That's not standing.  
9 That's just what I would have done.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: Just to make sure  
12 that -.

13 MR. [REDACTED]: So let's say -.

14 MS. [REDACTED]: Just to answer the  
15 questions that I would have had regarding that.

16 MR. [REDACTED]: So -.

17 MS. [REDACTED]: I can't explain -. I  
18 can't tell you what somebody else would have  
19 done.

20 MR. [REDACTED]: So let's say --

21 MS. [REDACTED]: Or should have done.

22 MR. [REDACTED]: -- [REDACTED] for instance.

23 He was on the looks like 8:00 to 2:00 p.m.

24 Let's say he knew that Reyes was gone and

25 Epstein was required to have a cellmate. What

1 should have he done? Should have he notified  
2 [REDACTED] and should have he notified [REDACTED]?

3 MS. [REDACTED]: [REDACTED] used to -. If  
4 he wasn't at that time, [REDACTED] used to be the  
5 SHU lieutenant. So [REDACTED] probably would have  
6 told them put somebody else in the cell with  
7 him.

8 MR. [REDACTED]: Okay.

9 MS. [REDACTED]: You know?

10 MR. [REDACTED]: So you think he would  
11 have just taken immediate action?

12 MS. [REDACTED]: I think he probably  
13 would have said just put somebody in the cell  
14 with him and call [REDACTED] and say hey this dude  
15 don't have a cellie. I took care of it or  
16 whatever.

17 MR. [REDACTED]: Now what about if --

18 MS. [REDACTED]: Or maybe he -.

19 MR. [REDACTED]: -- the executive staff  
20 wants to have a hand in picking and choosing  
21 who it is that Epstein is assigned to because  
22 of his high-profile status? Should have [REDACTED]  
23 still done that temporarily? Or should have  
24 [REDACTED] just notified [REDACTED]?

25 MS. [REDACTED]: That is - that wasn't

1 written in stone.

2 MR. [REDACTED]: Okay.

3 MS. [REDACTED]: That is something  
4 that I would have done.

5 MR. [REDACTED]: You would have done what?

6 MS. [REDACTED]: I would - that's  
7 something that I would have done.

8 MR. [REDACTED]: Was that temporarily?

9 MS. [REDACTED]: I'm not saying that  
10 that's across the board that every operations  
11 lieutenant that was here that day and was that  
12 found themselves in that position. I'm not  
13 going to say that's what -. There's no  
14 standard procedure for that situation because  
15 that's out of the ordinary. First of all, if  
16 we're going to go by what should have been  
17 done, Epstein should have been on 10 South.  
18 That's what should have been done.

19 MR. [REDACTED]: Okay.

20 MS. [REDACTED]: Period.

21 MR. [REDACTED]: And what -?

22 MS. [REDACTED]: Now everything when -  
23 .

24 MR. [REDACTED]: So you keep on going back  
25 to 10 South.

1 MS. [REDACTED]: Right because --

2 MR. [REDACTED]: What the difference  
3 between --

4 MS. [REDACTED]: -- that's how --

5 MR. [REDACTED]: -- 10 South -?

6 MS. [REDACTED]: -- important it is.

7 MR. [REDACTED]: So what's the difference  
8 between 10 South and the SHU?

9 MS. [REDACTED]: The difference  
10 between SHU is that SHU is for general  
11 population inmates.

12 MR. [REDACTED]: Okay.

13 MS. [REDACTED]: You know. You're not  
14 guaranteed to have a cellie there. You know.  
15 So you may have a cellie and you may not.  
16 Epstein was a high-profile inmate. All high-  
17 profile inmates they usually assign to 10  
18 South. Epstein had just -. Even before he  
19 committed suicide. Everybody knew and that's  
20 not just here. That's people in the region.  
21 You know all the way up to Donald Trump knew  
22 Epstein was here. You know. And when you look  
23 at Donald Trump all the way down the line, you  
24 know, to the regional director, the  
25 correctional services administrator. All those

1 people should have been involved in where  
2 Epstein was placed when he got here. Now that  
3 you know because they failed to do their job,  
4 you know, and place him on 9 South where he  
5 never should have been to begin with.

6 MR. [REDACTED]: Nine South or 10? Oh  
7 they put him in 9 South.

8 MS. [REDACTED]: 9 South.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: They placed him in  
11 regular old SHU.

12 MR. [REDACTED]: Okay.

13 MS. [REDACTED]: For inmates that  
14 faced disciplinary action. Inmates that are  
15 being separated from other inmates in  
16 protective custody. Those to - things of that  
17 nature.

18 MR. [REDACTED]: So -.

19 MS. [REDACTED]: If he -.

20 MR. [REDACTED]: In 10 South, do inmates  
21 all have cellmates in 10 South?

22 MS. [REDACTED]: Inmates on 10 South  
23 don't have cellmates. But.

24 MR. [REDACTED]: Okay.

25 MS. [REDACTED]: What they do have up

1 there -. And I'm telling you he should have  
2 been put up there from day one. Most  
3 especially after he attempted suicide. So if  
4 you didn't place him up there from day one.  
5 When he attempted suicide with a cellmate.  
6 Okay? Let's not forget that because when he  
7 attempted suicide, he had a cellmate.

8 MR. [REDACTED]: Yeah but isn't the reason  
9 why he didn't - wasn't successful partly  
10 because of the cellmate? My understanding was  
11 because once you're - once you commit suicide,  
12 you want another person to try to prevent it  
13 from actually a suicide being successful. So  
14 if they want someone in there to basically  
15 watch him, wouldn't they want him in the SHU  
16 versus 10 South?

17 MS. [REDACTED]: You're not guaranteed  
18 that -.

19 MR. [REDACTED]: You're not guaranteed but  
20 I think that the purpose of him being required  
21 a cellmate was that they want someone in there.  
22 And that's why they wanted him vetted. Because  
23 the purpose was so that someone could be  
24 watching him partly. If he's trying to hang  
25 himself, there's obviously going to be another

1 cellmate in there saying what are you going?

2 MS. [REDACTED]: First of all, an  
3 inmate don't owe you nothing.

4 MR. [REDACTED]: Sure.

5 MS. [REDACTED]: Another inmate don't  
6 owe you anything. And another inmate by policy  
7 is not to be supervising another inmate. So by  
8 you saying - because I don't even agree with  
9 inmate companions.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: I've known a lot of  
12 inmate companions who would antagonize the  
13 person on watch just so they hang their damn  
14 selves. Okay?

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: So for you to sit  
17 here and put somebody who you know is as high-  
18 profile and as important as everybody made  
19 Epstein out to be at that time, you relied on a  
20 random inmate to keep him safe. I mean, that's  
21 -. You're fooling yourself.

22 MR. [REDACTED]: Okay.

23 MS. [REDACTED]: You're fooling  
24 yourself.

25 MR. [REDACTED]: Okay. So just for your

1 own personal opinion was that he should have  
2 been on 10 South and he shouldn't have had an  
3 inmate at all. He should have just had closer  
4 eyes on by staff members?

5 MS. [REDACTED]: That's not my  
6 personal opinion. That's my professional  
7 opinion.

8 MR. [REDACTED]: Right.

9 MS. [REDACTED]: Because I've worked  
10 in this environment --

11 MR. [REDACTED]: Sure.

12 MS. [REDACTED]: -- long enough to  
13 know --

14 MR. [REDACTED]: Okay.

15 MS. [REDACTED]: -- that if somebody  
16 said important to you --

17 MR. [REDACTED]: Where psychology -.

18 MS. [REDACTED]: -- and you wanted to  
19 keep them safe, and for the type of inmate that  
20 he was, that was the best environment for him.  
21 They have cameras up there in every cell. And  
22 they have a staff member -.

23 MR. [REDACTED]: There's cameras in the  
24 cell themselves?

25 MS. [REDACTED]: There's cameras in

1 each individual cell. And there is - the  
2 officers have monitors right by their desk.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: So.

5 MR. [REDACTED]: So if they would have had  
6 eyes on at all times.

7 MS. [REDACTED]: They would have had  
8 eyes on him at all times.

9 MR. [REDACTED]: Awesome. Okay. So  
10 alright. I just wanted to get -.

11 MS. [REDACTED]: And I mean -.

12 MR. [REDACTED]: I really wanted to find  
13 out though, in this specific circumstance, who  
14 should have told you? That's the main  
15 question.

16 MS. [REDACTED]: I mean a lot of  
17 people.

18 MR. [REDACTED]: Who should have informed  
19 you.

20 MS. [REDACTED]: A lot of people could  
21 have told me.

22 MR. [REDACTED]: Right.

23 MS. [REDACTED]: A lot of people could  
24 have told me.

25 MR. [REDACTED]: And you didn't have any

1 conversations with anyone about that  
2 requirement? Because again, it seems like  
3 everybody else knew. You didn't. So I'm just  
4 trying to figure out where that communication  
5 breakdown -.

6 MS. [REDACTED]: I don't know where it  
7 --

8 MR. [REDACTED]: - occurred.

9 MS. [REDACTED]: -- occurred.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: To be honest with  
12 you.

13 MR. [REDACTED]: Okay. Would have it been  
14 the captain is responsible for that? Or is it  
15 in this instance, since you said you didn't  
16 know at all, should have [REDACTED] called [REDACTED],  
17 [REDACTED] told you?

18 MS. [REDACTED]: I don't -. Look.  
19 Look. I'm not going to sit here and tell you  
20 what somebody could have, should have, would  
21 have done. Because like I said, there was a  
22 lot of things going on at this institution. If  
23 we're going to say "shoul-da-woul-da-coul-da,"  
24 then we should have had adequate staffing.

25 MR. [REDACTED]: Yep.

1 MS. [REDACTED]: We shouldn't have had  
2 staff here that were dead on their feet.

3 MR. [REDACTED]: Sure.

4 MS. [REDACTED]: You know. Trying to  
5 watch an inmate. And when all those  
6 circumstances that was going on, there was a  
7 lot of things that we should have been doing  
8 that wasn't done. So it's not just about what  
9 happened to Epstein. It's about everything  
10 else surrounding his death that occurred that  
11 didn't happen.

12 MR. [REDACTED]: That's one point.

13 MS. [REDACTED]: That should have been  
14 occurring that didn't happen.

15 MR. [REDACTED]: Okay. Now let's - I'm going  
16 to take it out. Let's say you're on shift.  
17 Inmate attempted to commit suicide. You know  
18 there's an issue with the inmate. You're  
19 leaving the shift. Do you have a conversation  
20 with the person you're relieving - I mean  
21 whoever's relieving you? Do you have a  
22 conversation with that person and advise them  
23 what happened during your shift?

24 MS. [REDACTED]: Yes. I would -.

25 MR. [REDACTED]: Why? Why would you do it?

1 Just to reason -.

2 MS. [REDACTED]: Because look. Let me  
3 explain something to you.

4 MR. [REDACTED]: No-no-no. I just need an  
5 explanation.

6 MS. [REDACTED]: No-no-no. I'm going  
7 to give you an explanation. But I'm going to  
8 give you the explanation that best suits the  
9 question that you're --

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: -- asking me. When  
12 we do these pass downs, everybody is different.  
13 Some people tell you verbatim everything that  
14 happened. Some people don't. That's just the  
15 nature of the beast. You know. I could sit  
16 here all day and say somebody should have told  
17 me something. Or you know if they had the  
18 information. But when you've got so many  
19 things on your mind and you've dealt with so  
20 many things during the course of the day, you  
21 know, people don't want to continue to stand  
22 there and do it. People forget. I mean they  
23 could have been standing there talking to me  
24 for five minutes with all the things that go on  
25 during the course of the day. You know.

1 That's not just here. That's every place I've  
2 been when it comes to pass down. Some people  
3 will tell you a bunch of stuff depending on  
4 when it happened during the course of the day  
5 and whatever else came behind it or came before  
6 it. People they --

7 MR. [REDACTED]: No, I understand that. No-  
8 no. I just -.

9 MS. [REDACTED]: -- don't always  
10 remember.

11 MR. [REDACTED]: I get that. But let's just  
12 say as Agent [REDACTED] already mentioned. If  
13 there was instructions from the captain down  
14 and the lieutenant. Let's say Lieutenant [REDACTED]  
15 was aware of the instructions and was clear  
16 instructions that Epstein had to have a  
17 cellmate. And he knew that the cellmate was  
18 removed. What was -. Let's just say in a  
19 perfect world. What was his role? When he  
20 left the shift. What should he have done?

21 MS. [REDACTED]: [REDACTED] would have -.

22 MR. [REDACTED]: No-no-no. It's not "would  
23 have." What should he have done?

24 MS. [REDACTED]: They would have  
25 already had -. If you're telling me that this

1 inmate left at what time?

2 MR. [REDACTED]: Well he left the cell at  
3 8:30 and by 1:30 he was gone from the  
4 institution.

5 MS. [REDACTED]: Okay. So by the time  
6 I got here at 10:00 at night, he should have  
7 already had. That should have already been  
8 taken care of.

9 MR. [REDACTED]: Okay. And that's what  
10 we're asking. Who should have taken care of  
11 it?

12 MS. [REDACTED]: The first person to  
13 have known that he didn't have a cellie.

14 MR. [REDACTED]: So if [REDACTED] was that  
15 person, should have he what should have he  
16 done? [REDACTED] doesn't work for the BOP anymore.  
17 So we're just asking what should have happened?

18 MS. [REDACTED]: It doesn't matter  
19 even if he was still --

20 MR. [REDACTED]: I know. I just -.

21 MS. [REDACTED]: -- working for the  
22 Bureau. I mean. If someone knew for a fact  
23 that he was supposed to have had a cellie. And  
24 they received some type of information or they  
25 came aware of the fact that he didn't. And

1 that inmate was never coming back. Depending  
2 on that, they should have questioned to see  
3 what was the circumstances surrounding that.  
4 When they determine what the circumstances were  
5 based upon the fact that if he was coming back  
6 or whether or not he wasn't coming back, then  
7 they should have made arrangements for him to  
8 get another cellie.

9 MR. [REDACTED]: Okay. I'm done. Can I see  
10 the roster one more time?

11 MR. [REDACTED]: Yeah. And then let's  
12 stay specific to your instance so we don't have  
13 to ask you like what should have they done? So  
14 as far as yours. If you - and again you  
15 weren't. But if you were aware that he was  
16 required to have a cellmate. Was there any  
17 action that you should have or could have taken  
18 between the hours that you were working?

19 MS. [REDACTED]: If I -.

20 MR. [REDACTED]: Could cell mates have  
21 been reassigned at that time of night?

22 MS. [REDACTED]: Morning watch is not  
23 the time to be moving inmates around because it  
24 presents too much of a safety issue.

25 MR. [REDACTED]: Sure.

1 MS. [REDACTED]: And being that if we  
2 don't have adequate staffing, then -. Morning  
3 watch, period. You're not even supposed to be  
4 opening doors on morning watch.

5 MR. [REDACTED]: So that's my question.  
6 If [REDACTED] had told you, which obviously he  
7 didn't. Correct?

8 MS. [REDACTED]: Correct.

9 MR. [REDACTED]: If he had, could have you  
10 even taken action?

11 MS. [REDACTED]: I would have  
12 contacted -. Like I said. I would have called  
13 [REDACTED] or psychology or somebody.

14 MR. [REDACTED]: So even at that time of  
15 night?

16 MS. [REDACTED]: Even at that - yes.  
17 Even at that time of the night.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: To figure out what's  
20 going on with -. I mean I can't justify just  
21 leaving him up there without a cellie if he's  
22 supposed to have one. How am I going to  
23 justify that? And that's not even something  
24 that I would even risk.

25 MR. [REDACTED]: What about the COs? If

1 the COs knew - so Noel and Thomas - that he was  
2 required to have a cellmate. Should have they  
3 notified you?

4 MS. [REDACTED]: They should have  
5 notified me. If they knew that he was supposed  
6 to have a cellie and he didn't, yes. And they  
7 would have.

8 MR. [REDACTED]: And in this -?

9 MS. [REDACTED]: If they had known  
10 that they would have.

11 MR. [REDACTED]: In this instance they  
12 never notified you though. Correct?

13 MS. [REDACTED]: No.

14 MR. [REDACTED]: So they didn't tell you  
15 and during this 4:00 a.m. it sounds like you  
16 talked to them twice. They never told you that  
17 Epstein didn't have a cellmate?

18 MS. [REDACTED]: No.

19 MR. [REDACTED]: Did they discuss Epstein  
20 with you at all?

21 MS. [REDACTED]: No.

22 MR. [REDACTED]: Okay. And did they -  
23 when they called control or any communications  
24 you had over the telephone - did they ever  
25 discuss Epstein?

1 MS. [REDACTED]: No.

2 MR. [REDACTED]: Or the cellmate?

3 MS. [REDACTED]: No.

4 MR. [REDACTED]: Okay.

5 MS. [REDACTED]: No.

6 MR. [REDACTED]: So these are the  
7 questions. We just want more like yes-no like  
8 this. And I don't mean to rush you, but we  
9 have a bunch of other interviews we have to  
10 conduct. So if we can keep to those like yes-  
11 no type of things would be so appreciated on  
12 our end.

13 MS. [REDACTED]: Well I can assure you  
14 that everything is not going to be a flat yes  
15 or no answer.

16 MR. [REDACTED]: Absolutely. I 100% get  
17 that.

18 MS. [REDACTED]: Because nothing in  
19 this business is --

20 MR. [REDACTED]: Right.

21 MS. [REDACTED]: -- flat yes or no.  
22 It's all off the cuff. So.

23 MR. [REDACTED]: Absolutely. And that's  
24 what we're just saying. Like if [REDACTED] knew  
25 what should have he done. It sounds like what

1 you're saying is he should have notified the  
2 captain and he should have made sure a cellmate  
3 was put in there. If [REDACTED] knew, same thing.  
4 He should have notified the captain, he should  
5 have put someone there. If you knew, you  
6 should have notified the caption, you should  
7 have put someone there. That's just the kind  
8 of what the ops lieutenant does. Would it be  
9 basically the ops lieutenant if it came up to  
10 that person? They notify the captain. They  
11 make sure it's done. Is that a fair  
12 assessment?

13 MS. [REDACTED]: Yeah. That's a fair  
14 assessment. And you're just notifying - and  
15 the only reason why we're letting the captain  
16 know is to let him know. Hey, you know you  
17 guys we keep telling you this guy should be on  
18 10 South, but you keep him on SHU. And we keep  
19 running into these close - really, really,  
20 close calls.

21 MR. [REDACTED]: So the staff -.

22 MS. [REDACTED]: So that's one reason  
23 why --

24 MR. [REDACTED]: Is the staff ever -?

25 MS. [REDACTED]: -- you notify them.

1 MR. [REDACTED]: Did you ever have any  
2 discussions about him needing to be 10 South  
3 with anyone prior to -?

4 MS. [REDACTED]: Everybody was telling  
5 them that he needed to be on 10 South.  
6 Everybody knew that.

7 MR. [REDACTED]: Alright. So prior to him  
8 even dying, you know, prior to August 10th. It  
9 was the captain and above were notified, hey we  
10 need to get him on 10 South?

11 MS. [REDACTED]: Let me tell you  
12 something. If we as lieutenants are  
13 responsible for knowing everything that we're  
14 supposed to know. and we're running this  
15 institution off the cuff, we don't know what's  
16 going to happen here at any given time of the  
17 day or night. If we're required to know that,  
18 you think that these cats in the region and in  
19 the central office and at the executive staff  
20 level don't know the same thing that or more  
21 than we know?

22 MR. [REDACTED]: So I guess the question  
23 is have you ever had any conversation - did you  
24 ever have any conversations with the caption  
25 yourself at that time?

1 MS. [REDACTED]: We've mentioned to  
2 them several times that Epstein should be on 10  
3 South.

4 MR. [REDACTED]: So who did you have  
5 conversations with regarding that?

6 MS. [REDACTED]: We've - I've never  
7 had a conversation with anybody. But during  
8 these times, when this stuff was happening, I  
9 used to always say you guys need to put Epstein  
10 on 10 South. Epstein needs to be on 10 South.

11 MR. [REDACTED]: So my question is when  
12 you say, "you guys," who were you saying that  
13 to?

14 MS. [REDACTED]: [REDACTED]. I would tell  
15 [REDACTED].

16 MR. [REDACTED]: So you specifically told  
17 [REDACTED]?

18 MS. [REDACTED]: I would tell [REDACTED]  
19 that -.

20 MR. [REDACTED]: Do you remember what his  
21 responses were?

22 MS. [REDACTED]: No. I don't remember  
23 what his -. Apparently, it was nothing. He  
24 never got moved.

25 MR. [REDACTED]: Right. And that's what I

1 just meant. Did you say like did he  
2 acknowledge at least that information that was  
3 provided to him? Hey, he should be on 10  
4 South?

5 MS. [REDACTED]: I don't know if he  
6 did or not.

7 MR. [REDACTED]: Bu you do recall actually  
8 telling him that?

9 MS. [REDACTED]: We all used to say  
10 that Epstein needs to be 10 South.

11 MR. [REDACTED]: Did you do it with a  
12 group of other lieutenants when you say, "we  
13 all used to?"

14 MS. [REDACTED]: No.

15 MR. [REDACTED]: But you yourself. Do you  
16 recall at least on one occasion or more that  
17 you told [REDACTED] that?

18 MS. [REDACTED]: Yeah. I mentioned to  
19 [REDACTED] that Epstein should be on 10 South.  
20 Yes.

21 MR. [REDACTED]: Prior to August 10th?

22 MS. [REDACTED]: I don't know what the  
23 date was.

24 MR. [REDACTED]: I just mean prior to him  
25 dying you told him this?

1 MS. [REDACTED]: Yes. Prior to him  
2 dying. And after he died. I mean.

3 MR. [REDACTED]: Okay. Sorry, I'll hand  
4 it back over to you. I apologize for  
5 hijacking.

6 MR. [REDACTED]: Do you have anything else on  
7 that topic? Because I'm going to jump through  
8 that.

9 MR. [REDACTED]: No. The main things,  
10 again, are these about the email. Why it  
11 wasn't received. The cellmate requirements  
12 which she said that she didn't. who was  
13 responsible for telling her that? What action  
14 should have been taken. What did she know -?

15 MR. [REDACTED]: That's (Indiscernible  
16 \*02:01:29)

17 MR. [REDACTED]: Sure.

18 MR. [REDACTED]: So I'm just going to jump to  
19 a different topic.

20 MR. [REDACTED]: And you mentioned how  
21 cameras are so important in 10 South. So now  
22 we're going to talk about the cameras that were  
23 actually in the SHU.

24 MS. [REDACTED]: Mm-hmm.

25 MR. [REDACTED]: So basic question. Who had

1 access to see what was happening on the  
2 cameras?

3 MS. [REDACTED]: What cameras?

4 MR. [REDACTED]: The cameras inside the MCC.  
5 As a lieutenant did you ever utilize the  
6 cameras for your job?

7 MS. [REDACTED]: I mean what cameras  
8 are you talking about? Because we don't -  
9 those of us who have access to cameras don't  
10 have access to the same cameras or -.

11 MR. [REDACTED]: You want to know about  
12 the SHU cameras.

13 MR. [REDACTED]: Yeah. It's about the SHU  
14 cameras.

15 MR. [REDACTED]: Who has access to the SHU  
16 cameras?

17 MS. [REDACTED]: Control. The control  
18 center has access to the SHU cameras. We have  
19 access to the SHU cameras. And as far as I  
20 know, that's it.

21 MR. [REDACTED]: When you say "we," is  
22 that the lieutenant's office?

23 MS. [REDACTED]: The lieutenant's  
24 office.

25 MR. [REDACTED]: Do you normally utilize the

1 cameras for your job at all? For you daily  
2 routine. Do you ever use it?

3 MS. [REDACTED]: If we're looking for  
4 - say we're looking for somebody say internal.

5 MR. [REDACTED]: Okay.

6 MS. [REDACTED]: We may glance at the  
7 camera to see if we see them or something like  
8 that. But we're not sitting there. We don't  
9 even have time to do that. And even if we did,  
10 we wouldn't be doing it. We're not sitting up  
11 there the whole time during our shift and just  
12 looking at the cameras to see what's going on.

13 MR. [REDACTED]: No. That's not what I mean.  
14 I just want to know. At that time - around  
15 that time period, did you know that there were  
16 cameras inside the MCC that were not working?

17 MS. [REDACTED]: I don't believe I  
18 did.

19 MR. [REDACTED]: So it -.

20 MR. [REDACTED]: Specific to the SHU.

21 MS. [REDACTED]: Oh. No.

22 MR. [REDACTED]: Did you know the cameras

23 --

24 MS. [REDACTED]: No.

25 MR. [REDACTED]: -- in the SHU were --

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

2 MR. [REDACTED]: -- not working?

3 MS. [REDACTED]: No-no-no. I wasn't  
4 aware.

5 MR. [REDACTED]: So even though you were  
6 the lieutenant at that night did you not know -  
7 ?

8 MS. [REDACTED]: The only cameras that  
9 I would know that I would be aware of if  
10 they're working or not would be the cameras  
11 that I have access to which I can look on the  
12 TV monitor and see that they're actively not  
13 working at the time. Or one of the other staff  
14 members who have access to cameras would call  
15 and tell me or say something to me about that  
16 camera not working.

17 MR. [REDACTED]: And did you know on  
18 August 10th during your shift or I guess late  
19 August 9th, early August 10th, that any cameras  
20 in the SHU were not working?

21 MS. [REDACTED]: No. I wasn't aware of  
22 that.

23 MR. [REDACTED]: As far as you remember,  
24 were the live portion of the cameras working in  
25 there? The ones that you were able to monitor

1 in real-time.

2 MS. [REDACTED]: The camera that we  
3 had access to from the lieutenant's office at  
4 the time was working.

5 MR. [REDACTED]: Would that show you both  
6 the staff members as well as the range?

7 MS. [REDACTED]: That camera only -  
8 that camera was really -. The visibility on it  
9 was bad. It has always been bad.

10 MR. [REDACTED]: So was it only one camera  
11 that you could access from your office of the  
12 SHU?

13 MS. [REDACTED]: There was only one  
14 camera that's up there on that monitor.

15 MR. [REDACTED]: Okay. And what does that  
16 camera show?

17 MS. [REDACTED]: I think it shows like  
18 the common area.

19 MR. [REDACTED]: Okay. So it doesn't even  
20 --

21 MS. [REDACTED]: The SHU.

22 MR. [REDACTED]: -- show the range?

23 MS. [REDACTED]: The ranges and stuff  
24 like that? No.

25 MR. [REDACTED]: But are there cameras on

1 the range?

2 MS. [REDACTED]: Yes. There's cameras  
3 on the range.

4 MR. [REDACTED]: So who has access to  
5 monitor that?

6 MS. [REDACTED]: I mean whoever has it  
7 up on their computer -.

8 MR. [REDACTED]: Okay. So you could  
9 toggle through what you want to look at.

10 MS. [REDACTED]: We can't toggle  
11 through --

12 MR. [REDACTED]: Okay.

13 MS. [REDACTED]: -- on our cameras in  
14 the lieutenant's office. No.

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: And I don't -.

17 MR. [REDACTED]: So in the lieutenant's  
18 office, it's just -. Would control center?  
19 Would they be the ones that would be having  
20 eyes on the range?

21 MS. [REDACTED]: Nobody is sitting  
22 around watching the range.

23 MR. [REDACTED]: Sure.

24 MS. [REDACTED]: The only people who  
25 would be watching the cameras is the officers

1 that's assigned to 10 South.

2 MR. [REDACTED]: Okay.

3 MS. [REDACTED]: Because they have the  
4 monitors right there at their desks.

5 MR. [REDACTED]: 10 South or 9 South?

6 MS. [REDACTED]: 10 South.

7 MR. [REDACTED]: So 10 South watches the  
8 SHU as well?

9 MS. [REDACTED]: No. Ten South  
10 watches the inmates assigned to 10 South.

11 MR. [REDACTED]: Oh. Sorry. But specific  
12 -. We're talking specifically to the SHU. So  
13 if, for instance, the range -.

14 MS. [REDACTED]: No. You asked me who  
15 would be watching SHU. Who would have access  
16 to those cameras? And I'm telling you the only  
17 person who would be watching any cameras and  
18 who is required to watch them would be the  
19 officers that are assigned to 10 South.

20 Outside of that --

21 MR. [REDACTED]: But my question is --

22 MS. [REDACTED]: -- nobody is watching  
23 any camera.

24 MR. [REDACTED]: -- so no one is watching  
25 it. But who --

1 MS. [REDACTED]: As far as I know.

2 MR. [REDACTED]: -- would have had access  
3 to it I guess is what we're saying. Who - if  
4 someone wanted to look at the range within the  
5 special housing unit, who would have access to  
6 that camera?

7 MS. [REDACTED]: I don't know if  
8 control has access to that.

9 MR. [REDACTED]: Okay. But your point is  
10 no one's watching that. So if it's down, who  
11 would know and how?

12 MS. [REDACTED]: I would think the  
13 people who are responsible for the cameras  
14 would know.

15 MR. [REDACTED]: And who is responsible  
16 for the cameras?

17 MS. [REDACTED]: The um, the  
18 communication guys.

19 MR. [REDACTED]: Do you know who -?

20 MS. [REDACTED]: And that would be if  
21 they -. I don't even know if they look at  
22 every camera every day to make sure that --

23 MR. [REDACTED]: Sure.

24 MS. [REDACTED]: -- they operative  
25 because usually, staff reports that camera

1 stuff when they notice it.

2 MR. [REDACTED]: Well how - so would  
3 people in the SHU know that their cameras were  
4 down?

5 MS. [REDACTED]: I don't know if they  
6 would know that. I have no way of knowing  
7 that.

8 MR. [REDACTED]: You just said if staff  
9 reported it. So that's the question would be  
10 like if the range camera in the SHU was down,  
11 who would know? Who would they notify? Who  
12 was responsible? Do you follow? So how would  
13 they know that the range camera was down?

14 MS. [REDACTED]: I have no idea how  
15 they would know.

16 MR. [REDACTED]: You don't know?

17 MS. [REDACTED]: Unless they have  
18 access to it and they know - they can see it on  
19 a monitor or something like that and see that  
20 it's not working. I don't know outside of that  
21 how they would know.

22 MR. [REDACTED]: DO you know -?

23 MS. [REDACTED]: Unless they was told.  
24 I don't know.

25 MR. [REDACTED]: Does the SHU have access

1 to that?

2 MS. [REDACTED]: Not that I'm aware  
3 of.

4 MR. [REDACTED]: Okay. So but you think  
5 the communications would be the ones that would  
6 know. Who in communications would be  
7 responsible for getting it taken care of -  
8 fixing the cameras?

9 MS. [REDACTED]: If they knew about  
10 it?

11 MR. [REDACTED]: Right.

12 MS. [REDACTED]: The guys that work in  
13 communications.

14 MR. [REDACTED]: All of them collectively?  
15 Or is there one person?

16 MS. [REDACTED]: I - look. Look. I  
17 don't work in communications.

18 MR. [REDACTED]: Sure.

19 MS. [REDACTED]: So I don't know if  
20 one would know, another one would know, or if  
21 they both would know at the same time. I don't  
22 know. I can't tell you how another department  
23 operates or how they conduct their business.

24 MR. [REDACTED]: Okay. Was there someone  
25 named Mr. [REDACTED]? (Phonetic Sp. \*02:07:26)

1 MS. [REDACTED]: Mr. [REDACTED] worked  
2 down there. Yes.

3 MR. [REDACTED]: Would he be potentially  
4 the one responsible for fixing it?

5 MS. [REDACTED]: I'm not going to say  
6 he would be responsible for fixing it. But if  
7 he was notified of it, he would have done it.

8 MR. [REDACTED]: What was his -?

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: I mean if that was  
11 his job. If that's what people in this  
12 institution wanted.

13 MR. [REDACTED]: Okay. And what -?

14 MS. [REDACTED]: Look. Let me make  
15 this clear to you. I don't know what the  
16 communications instructions were regarding -.

17 MR. [REDACTED]: And we're not asking you  
18 those questions. I'm sorry. We're not asking  
19 you -. We're not looking at you to solve all  
20 the problems. We just need to know like as far  
21 as like if a camera goes down, who fixes it?

22 MS. [REDACTED]: If a staff member had  
23 access to a camera and that camera went out, we  
24 would call the communications department to  
25 have them take a look at that camera and to

1 repair it or replace it, to fix it or whatever  
2 needed to be done.

3 MR. [REDACTED]: And roughly -

4 MS. [REDACTED]: And that depends on  
5 who answered the phone. That would be whoever  
6 was working down there at the time, depending  
7 on which one answered the phone. That's who we  
8 would relay that information to. We weren't  
9 picky about talking to a specific person. It  
10 would be like if they work in that area, then  
11 they should be capable of doing whatever it is  
12 that we need to do to restore the cameras. Or  
13 whatever manner they need to go about getting  
14 it done.

15 MR. [REDACTED]: How quickly usually does  
16 that get resolved? If a camera goes down, do  
17 they really get it back up and running pretty  
18 quickly? Or does it take days?

19 MS. [REDACTED]: If they're here and  
20 they can replace it, they replace it on the  
21 spot.

22 MR. [REDACTED]: ON the spot?

23 MS. [REDACTED]: Right.

24 MR. [REDACTED]: Would it be abnormal for  
25 it to take -. So if someone reported it on a

1 Thursday, would it be abnormal for them to wait  
2 until Monday to fix it?

3 MS. [REDACTED]: I don't -. I can't  
4 say that because I don't know what the  
5 circumstances would be concerning why they're  
6 waiting until Monday to do it.

7 MR. [REDACTED]: Okay.

8 MR. [REDACTED]: During your time as a  
9 lieutenant during that time period, did you  
10 ever see any cameras down for any extended  
11 period of time?

12 MS. [REDACTED]: Not that I can recall  
13 right at this very moment.

14 MR. [REDACTED]: And Mr. [REDACTED]. What was  
15 his position? Do you remember?

16 MS. [REDACTED]: He's the  
17 communications officer. I think that's his  
18 title.

19 MR. [REDACTED]: Do you know his first  
20 name?

21 MS. [REDACTED]: No.

22 MR. [REDACTED]: I'm going to jump.

23 MR. [REDACTED]: Yeah. Please.

24 MR. [REDACTED]: Do you recall when you came  
25 that evening August 9th. That evening when you

1 came on the shift. Do you recall hearing about  
2 Epstein making a phone call?

3 MR. [REDACTED]: Jesus. This  
4 (Indiscernible \*02:09:51).

5 MR. [REDACTED]: Do you recall that?

6 MS. [REDACTED]: No.

7 MR. [REDACTED]: Okay. Is it normal practice  
8 -? I'm just going to -. Is it normal practice  
9 -? Let's say an inmate had to make a phone  
10 call. And the inmate doesn't have that line,  
11 you know the PIN set up for them, is it normal  
12 for an officer to use the legal line to allow  
13 the inmate to make a phone call?

14 MS. [REDACTED]: Not that I'm aware  
15 of.

16 MR. [REDACTED]: Okay. Have you ever heard of  
17 anyone using the legal line other for anything  
18 unauthorized?

19 MS. [REDACTED]: No.

20 MR. [REDACTED]: Okay. Did you interact or  
21 see Epstein on August 9th? Interact with or  
22 see Epstein on August 9th?

23 MS. [REDACTED]: No.

24 MR. [REDACTED]: Okay.

25 MR. [REDACTED]: So neither August 9th nor

1 August 10th?

2 MS. [REDACTED]: No.

3 MR. [REDACTED]: Did you ever have any  
4 interactions with Epstein?

5 MS. [REDACTED]: Yes, I've had  
6 interaction. When he committed the suicide -  
7 when he attempted suicide. I interacted with  
8 him then.

9 MR. [REDACTED]: What about after that  
10 date?

11 MS. [REDACTED]: After that day, no.

12 MR. [REDACTED]: Did you even see him  
13 after that day?

14 MS. [REDACTED]: No.

15 MR. [REDACTED]: No? What about the cells  
16 in the SHU? Can you see through them or are  
17 they like open up a slide in order to 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<sup>3</sup> 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 they  
8 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 or  
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 with  
14 direction with other inmates? Did he have any  
15 issues 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 Toby 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.

3 MR. [REDACTED]: When you say you actually  
4 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 confident 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 r 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 rounds or counts  
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 falsification of rounds and

1 counts? Who has to sign off on the counts and  
2 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 if 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 would be like  
13 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 you  
13 got a count that was a 73 and you said do it  
14 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 and this is where I just want to make sure that  
23 we're all on the same page here. So you did  
24 though take action. You got a count slip that  
25 seemed to be inaccurate and questioned it. You

1 said can you do the count again.

2 MS. [REDACTED]: I hadn't even gotten  
3 the count slip then.

4 MR. [REDACTED]: Oh, okay.

5 MS. [REDACTED]: Like I said, when  
6 they called in the count, they said the count  
7 like the count in the book or wherever they was  
8 reading it from say 73 but there is an inmate  
9 in R&D.

10 MR. [REDACTED]: So that's how they called  
11 the count in? There's 73, but there's one  
12 inmate in R&D. And you said, can you do the  
13 count again?

14 MS. [REDACTED]: They wasn't even  
15 really calling in the count. They was  
16 questioning. You know they were basically  
17 informing me that we've got 73 -. Because they  
18 weren't even sure what they should do or how  
19 they should go about it.

20 MR. [REDACTED]: Okay.

21 MS. [REDACTED]: You know. They just  
22 wanted it to be known that there was an inmate  
23 off their housing unit that was somewhere else.  
24 He wasn't physically on the housing unit. And  
25 that was the whole question as to how do they

1 want us to do - how are we supposed to count  
2 this guy? What's the deal with that? So I'm  
3 saying, you know, let me - I need to figure  
4 this out. Because I wasn't - I didn't even  
5 know that there was a guy in R&D at the time.  
6 So I need to verify that there is a guy in R&D  
7 and what's the status of this dude in R&D, why  
8 he's there. All these questions I have to ask  
9 before I can even tell them anything about it.

10 MR. [REDACTED]: So at what point would  
11 have they filled out the count slip? After you  
12 did the verification? Would have they then  
13 created the count slip?

14 MS. [REDACTED]: They would have  
15 created a new count slip.

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

17 MS. [REDACTED]: And that count slip  
18 apparently was never picked up because --

19 MR. [REDACTED]: Never picked up and not  
20 recorded.

21 MR. THIELHORN: -- because the one that  
22 you all was able to get a copy of was the 73  
23 and not the one that reflected the in count  
24 which would have been 72.

25 MR. [REDACTED]: And do you know that

1 there was a count slip that was created?

2 MS. [REDACTED]: I have no reason to  
3 believe that there wasn't.

4 MR. [REDACTED]: But do you have a reason  
5 to believe that there was? Did you ever see  
6 one?

7 MS. [REDACTED]: If I had saw it, it  
8 would have been during the time that I would  
9 have taken the count and I would have attached  
10 it to the rest of the count slips and went on  
11 about my business.

12 MR. [REDACTED]: So at the same time we're  
13 saying to you there's no reason to believe that  
14 there wasn't. there's also then no reason to  
15 believe that there was.

16 MS. [REDACTED]: I - let me tell you -  
17 .

18 MR. [REDACTED]: The point being is that  
19 you don't know. You don't know if there was a  
20 count slip.

21 MS. [REDACTED]: If -. Let me tell  
22 you something. Based upon the fact that I've  
23 worked with these guys for a certain period of  
24 time and I know what they're capable of doing.  
25 I can for the most part tell you what somebody

1 would do and what they wouldn't do. I have  
2 never had a problem with a staff member not  
3 correcting their count slip or not sending me  
4 another - a corrected count slip.

5 MR. [REDACTED]: Now we're only asking you  
6 because I have personally not seen it. So I'm  
7 asking you if there's another one, do we need  
8 to go try to find this. Or do you not know.

9 MS. [REDACTED]: You're not going to  
10 find it. I mean it's two years after.

11 MR. [REDACTED]: Right.

12 MS. [REDACTED]: Where are you going  
13 to find it at? If it wasn't picked up - I mean  
14 the fact that they could have put it out there  
15 and no one picked it up.

16 MR. [REDACTED]: Here's a question. If they  
17 did do one, right, it's expected that they  
18 should have for that one. Right. A new one.  
19 Yes or no? Because of the error, it was  
20 expected that they would have filled out a new  
21 one with the correct number.

22 MS. [REDACTED]: I'm sure that they  
23 feel that they filled out another one and  
24 probably put it out in and it was an oversight  
25 on somebody's part and they didn't pick it up.

1 MR. [REDACTED]: Yeah but here's the thing.  
2 You don't know if - yes or no. Did you see it  
3 for that? Yes or no.

4 MS. [REDACTED]: No. I didn't see  
5 it.

6 MR. [REDACTED]: No-no. We're going that  
7 would it possibly have been picked up at the  
8 3:00 a.m. count?

9 MS. [REDACTED]: I don't know when it  
10 could have been picked up, sir.

11 MR. [REDACTED]: Is it in the same place? Or  
12 is it a different place it's kept?

13 MS. [REDACTED]: Depending. I mean  
14 they could have put it in the same place. They  
15 could have put it in a different place. I  
16 don't know.

17 MR. [REDACTED]: Okay. That's it. We just  
18 want to know.

19 MR. [REDACTED]: I can't tell you something  
20 that I didn't see. If I didn't see it, I can't  
21 --

22 MR. [REDACTED]: And that's what --

23 MS. [REDACTED]: -- tell you where  
24 they put it or who picked it up or what  
25 happened to it.

1 MR. [REDACTED]: And that's what we're  
2 getting at. The point being is that you're not  
3 sure. So we just don't want to - because you  
4 said you have no reason to believe that they  
5 didn't. That indicates that they did. And we  
6 just want to make sure that you're correct.  
7 You've never seen it. You're actually not sure  
8 if they did or not.

9 MS. [REDACTED]: Okay.

10 MR. [REDACTED]: Is that correct though?

11 MS. [REDACTED]: No. I never saw the  
12 count slip.

13 MR. [REDACTED]: Okay. Perfect. I mean  
14 it's not like a "gotcha," we just want to make  
15 sure --

16 MR. [REDACTED]: Yeah.

17 MR. [REDACTED]: -- that you dint - there  
18 isn't a count slip out there that we need to  
19 try to go find.

20 MS. [REDACTED]: Let me tell you  
21 something. It's -. If-if-if. I can't - if I  
22 can make something right that's wrong or need  
23 correcting, then that's what I'm here for. I'm  
24 not here to like I said, and I'll say this a  
25 thousand times. I'm not here to cover for

1 nobody. I'm not here to provide false answers  
2 for something that somebody had done, but at  
3 the same time, you all are throwing these  
4 questions at me about what somebody would have  
5 done. I don't know what's in somebody's mind -  
6 -

7 MR. [REDACTED]: Ma'am, we're absolutely  
8 not asking --

9 MS. [REDACTED]: -- with the stuff --

10 MR. [REDACTED]: -- those questions.

11 We're asking you --

12 MS. [REDACTED]: -- that's taken  
13 place.

14 MR. [REDACTED]: We're saying did you see  
15 it. So that's what we're trying to get you to  
16 answer more like yes, no, I don't know on that  
17 front. So we're trying to keep it consolidated  
18 and ask you direct questions. What did you  
19 know? Did you know if they did another count  
20 slip?

21 MS. [REDACTED]: Well what I also know  
22 is there's no reason for them to not have done  
23 it. I've never had a reason or a circumstance  
24 where somebody didn't do a corrected count  
25 slip. I mean it's - there's really nothing to

1 it.

2 MR. [REDACTED]: And this is only because  
3 of the way you're answering this. Should have  
4 you ensured that they did a new count slip?

5 MS. [REDACTED]: I had no reason to.

6 MR. [REDACTED]: But was it your  
7 responsibility to ensure that they created a  
8 new count slip?

9 MS. [REDACTED]: It was my  
10 responsibility to tell them. Well they knew to  
11 create it. If the count was different, they  
12 knew to create a new count slip. I'm not  
13 required to wait around for that count slip to  
14 manifest itself in SHU when I have a thousand  
15 other duties to do.

16 MR. [REDACTED]: Okay.

17 MS. [REDACTED]: I leave that you  
18 know.

19 MR. [REDACTED]: So it's your requirement  
20 to do a new count but it's not your requirement  
21 to follow up to obtain a new count slip.

22 MS. [REDACTED]: Because what  
23 generally happens is that the internal officers  
24 would go pick that count slip up and bring it  
25 down to the control center. And they would

1 attach it to that count.

2 MR. [REDACTED]: And would have it then  
3 been Noel or Thomas' responsibility to contact  
4 internal to tell them to come get it? Or would  
5 it have been your responsibility to tell  
6 internal to?

7 MS. [REDACTED]: Sometimes I would  
8 tell them. Sometimes SHU would tell them. It  
9 just depends --

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: -- on the  
12 circumstance.

13 MR. [REDACTED]: In this circumstance do  
14 you know who would have been responsible for  
15 that?

16 MS. [REDACTED]: I mean we all could  
17 have done it.

18 MR. [REDACTED]: Okay.

19 MS. [REDACTED]: We all could have  
20 done it.

21 MR. [REDACTED]: So when you say depending  
22 on circumstance in this -.

23 MS. [REDACTED]: Well that was just  
24 something I said. But any of us could have  
25 done it. If control - if I see that control -.

1 MR. [REDACTED]: So let's get at it this  
2 way. Did you contact internal?

3 MS. [REDACTED]: Let me tell you  
4 something. If internal comes to the control  
5 center, and I walk over there to drop off count  
6 slips that they've already collected. And I  
7 walk over there and I see them there. And I'll  
8 say hey, can you go grab the new one from 9  
9 South. That would be an example of a  
10 circumstance.

11 MR. [REDACTED]: Okay. So in this  
12 circumstance, did you contact internal and tell  
13 them to get the new slip?

14 MS. [REDACTED]: I didn't contact --

15 MR. [REDACTED]: Okay.

16 MS. [REDACTED]: -- to tell them.

17 MR. [REDACTED]: And are you aware if  
18 Thomas and Noel contacted internal to come  
19 collect a new slip?

20 MS. [REDACTED]: They may have. And I  
21 may have -.

22 MR. [REDACTED]: But you're not aware?

23 MS. [REDACTED]: And control may have  
24 announced it over the intercom. I can't  
25 remember from --

1 MR. [REDACTED]: Sure.

2 MS. [REDACTED]: -- this year to that  
3 one.

4 MR. [REDACTED]: You're not aware. Great.

5 MS. [REDACTED]: You know if that  
6 actually occurred.

7 MR. [REDACTED]: Now you mentioned that an  
8 all-staff email should have been put out that  
9 Epstein had a requirement. Who should have put  
10 that out?

11 MS. [REDACTED]: The person - the -.

12 MR. [REDACTED]: Is that psychology? The  
13 warden? The captain? The AW?

14 MS. [REDACTED]: I mean they all  
15 should have been doing it.

16 MR. [REDACTED]: Okay.

17 MS. [REDACTED]: To be honest with  
18 you, they all should have known that he should  
19 have been up on 10 South.

20 MR. [REDACTED]: Okay.

21 MS. [REDACTED]: But.

22 MR. [REDACTED]: Has an all-staff email  
23 ever gone out before saying that this person is  
24 on suicide watch. He's required to have an  
25 email. I mean a cellmate.

1 MS. [REDACTED]: Here?

2 MR. [REDACTED]: Yes.

3 MS. [REDACTED]: I've never seen that.  
4 I've never seen that done here. But we didn't  
5 have -. I'm trying to remember a time when  
6 prior to Epstein that I had even seen an email  
7 period about an inmate needing an inmate in the  
8 cell to be housed with another inmate. To be  
9 honest with you.

10 MR. [REDACTED]: Okay. Now speaking to  
11 that though, you know, we showed you the email  
12 that was sent to you that you said you don't  
13 recall ever receiving it. Do you have a lot of  
14 emails that have gone unread?

15 MS. [REDACTED]: I'm sure I do.

16 MR. [REDACTED]: Okay. So yeah. You  
17 didn't receive this but there's also a lot of  
18 emails that you didn't receive --

19 MS. [REDACTED]: There's a lot of  
20 emails that I receive --

21 MR. [REDACTED]: -- and you probably  
22 haven't --

23 MS. [REDACTED]: -- and have time to  
24 read at that time because of everything that  
25 was going on during our shift and in this

1 building.

2 MR. [REDACTED]: And is that just a  
3 constant issue of just trying to keep up with  
4 emails as well as do your job?

5 MS. [REDACTED]: That was a constant  
6 issue. Yes. Because there was so much going  
7 on in this building at the time. So much  
8 chaos. That you didn't have time to read.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: You didn't have time  
11 to read a lot of the emails that you'd gotten.  
12 But most importantly, if when you're talking  
13 about information that's that important, you  
14 know. Whoever is sending out the information.  
15 Whoever got the information should always be  
16 trying to make sure that everybody knows that  
17 this is important. We have to make sure that  
18 he had a cellie because like I said, the  
19 officers are the main ones who come in contact.

20 MR. [REDACTED]: And that goes back to our  
21 original question.

22 MS. [REDACTED]: With the inmates.

23 MR. [REDACTED]: If the chain of command  
24 went up to [REDACTED] during that time and that he  
25 knew that he was required to have a cellmate

1 and didn't. what should have he done?

2 MS. [REDACTED]: If what?

3 MR. [REDACTED]: If you were the ops  
4 lieutenant at the time, so put yourself into  
5 the place of [REDACTED]. If you knew that Epstein  
6 was required to have a cellmate, and his  
7 current cellmate was removed, he should have -  
8 and what you said was, I believe, he should  
9 have notified the captain and ensure that a  
10 cellmate was put in place.

11 MS. [REDACTED]: That's what I would  
12 have done.

13 MR. [REDACTED]: Correct.

14 MS. [REDACTED]: I said [REDACTED] was the  
15 SHU lieutenant at one point. So he probably  
16 would have assigned another inmate to the cell.  
17 It just depends on you as a supervisor.

18 MR. [REDACTED]: Sure.

19 MS. [REDACTED]: There is nothing  
20 written in stone concerning how you're going to  
21 - indicating how you're going to handle that  
22 situation because -.

23 MR. [REDACTED]: And if the inmate that  
24 was removed - Reyes - was done at the end of  
25 his shift, should have he then passed that

1 information on to the next operations  
2 lieutenant to be able to handle the situation?

3 MS. [REDACTED]: That's if he knew  
4 about it. But chances are, he probably would  
5 have had it --

6 MR. [REDACTED]: No, let's --

7 MS. [REDACTED]: -- done before he  
8 left.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: I can't --

11 MR. [REDACTED]: So you think that --

12 MS. [REDACTED]: Look. I can't answer  
13 for him.

14 MR. [REDACTED]: Sure.

15 MS. [REDACTED]: I don't know what he  
16 should have done or what he would have done or  
17 what --

18 MR. [REDACTED]: If it was --

19 MS. [REDACTED]: -- he could have  
20 done.

21 MR. [REDACTED]: -- as an ops lieutenant.  
22 Do you think even if it happened at the end of  
23 a shift, he should have handled it?

24 MS. [REDACTED]: I'm not saying what  
25 he should have done.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: I'm saying -. Look.  
3 What he should have done and what he could have  
4 done and what he would have done is on him.

5 MR. [REDACTED]: Sure.

6 MS. [REDACTED]: We don't have - there  
7 is no instruction or no instructional manual  
8 that tells us every little thing that we're  
9 supposed to be doing --

10 MR. [REDACTED]: Right.

11 MS. [REDACTED]: -- for every scenario  
12 because it'll never happen.

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: You'll never have an  
15 exact scenario for everything that happens.  
16 You just have to use your common sense and good  
17 judgment regarding it.

18 MR. [REDACTED]: So going back to what you  
19 said about your hours aren't specific to what  
20 the duty agent roster says. You said you would  
21 work -. Although the roster says 12:00 a.m. to  
22 8:00 a.m., you were actually 10:00 p.m. to 6:00  
23 a.m. What would have [REDACTED] have been on August  
24 9th. Looking at the duty roster. What times  
25 would he have actually - have worked according

1 to that?

2 MS. [REDACTED]: I'm thinking he would  
3 have worked -. he would have come in around  
4 6:00 and worked until 2:00.

5 MR. [REDACTED]: Okay. So he would have  
6 been 6:00 a.m. to 2:00 p.m.?

7 MS. [REDACTED]: Yes.

8 MR. [REDACTED]: And then [REDACTED] would  
9 have been 2:00 p.m. to 10:00 p.m.?

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

11 MR. [REDACTED]: Okay. If he didn't -.  
12 If [REDACTED] didn't tell [REDACTED] that, would have  
13 it then been the ultimate responsibility for  
14 the COs to again report it up the chain of  
15 command? Or because they reported it  
16 previously, would that have covered them with  
17 hey we got it up to the ops lieutenant. That  
18 person's supposed to take care of it. Do you  
19 follow what I'm saying? So for people working  
20 in the SHU. They had already reported it up.  
21 It got to [REDACTED]. At that point, is everybody  
22 in the SHU covered? They reported it. Or  
23 should each subsequent shift has also reported  
24 hey he's supposed to have an inmate - he's  
25 supposed to have a cellmate in here. He

1 doesn't.

2 MS. [REDACTED]: That's if they knew.  
3 There is no reason for me to believe that those  
4 guys that was there on SHU that if they knew  
5 that, whether or not before they left, I'm sure  
6 they would have questioned that again as to  
7 what you want me to do about this particular  
8 situation.

9 MR. [REDACTED]: Okay. So should have  
10 each -. So then let's say if Thomas and Noel  
11 did know. And they knew he was without a  
12 cellmate. Should have they then told you?  
13 When you did your rounds? Like when they're  
14 calling control. And you're stopping by at  
15 4:00 a.m. Would have it been their  
16 responsibility to say hey, just so you know,  
17 he's required to have a cellmate and he  
18 doesn't.

19 MS. [REDACTED]: I'm not going to say  
20 that that's what they should have done because  
21 there's no rules and regulations regarding  
22 that. But they - I would have - if it was me,  
23 I would have mentioned it.

24 MR. [REDACTED]: Okay. So even if they  
25 know, somebody told them just make sure. He's

1 required to have a SHU at that point, they're  
2 not actually required to notify someone.

3 MS. [REDACTED]: If what? If somebody  
4 tells -?

5 MR. [REDACTED]: So you're saying that  
6 there's no rules and -

7 MS. [REDACTED]: If who tells them  
8 that?

9 MR. [REDACTED]: So if they are told. And  
10 I'm not saying you did.

11 MS. [REDACTED]: You're saying -. Okay  
12 so now you're saying if they knew that he was  
13 supposed to have a cellie.

14 MR. [REDACTED]: Correct.

15 MS. [REDACTED]: Yeah. If they knew  
16 the was supposed to have a cellie.

17 MR. [REDACTED]: If they knew -. Yeah.  
18 So if they then because it was during their  
19 shift. They should have at some point informed  
20 you hey he's supposed to have a cellmate and he  
21 doesn't. And they didn't do that. Correct?

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

23 MR. [REDACTED]: Okay. Fair enough.  
24 That's it. You done?

25 MR. [REDACTED]: (Indiscernible \*02:48:29)

1 MR. [REDACTED]: What?

2 MR. [REDACTED]: Do you know of any -  
3 currently, do you know of any policy violations  
4 that's happening at the MCC?

5 MS. [REDACTED]: As far as what?

6 MR. [REDACTED]: For August 9th and 10th  
7 or are you talking about --

8 MR. [REDACTED]: No-no-no. Just in general.

9 MR. [REDACTED]: -- just in general?

10 MR. [REDACTED]: In general. In general, do  
11 you know of any policy violations or any kind  
12 of violations happened here at the MCC?

13 MS. [REDACTED]: What I do know is  
14 that there are people here who abuse their  
15 power. They blame everybody for everything and  
16 they expect everybody to members of  
17 correctional services and to take on the  
18 responsibilities of other departments when it's  
19 clearly not their responsibility. You have a  
20 lot of people that come here that really are  
21 not versed on what it is they're supposed to be  
22 doing - their responsibilities. So they pawn  
23 that off on other people. But there's a -.  
24 There's no clear and defined form of policy and  
25 procedure here. There's no consistency that

1 goes on here. Everything is hodge-podge. A  
2 lot of times, people are required to make  
3 decisions off the cuff or to do -. Because  
4 when you come here, if you don't have or while  
5 you're here - or working here. There is no  
6 formal guidance that teaches and guides staff  
7 to know what they're supposed to be doing.  
8 There's nothing written in stone regarding what  
9 you're supposed to be doing and what you're  
10 supposed to be doing on a daily basis. There  
11 are post orders and stuff like that. But  
12 they're not in depth enough to let staff know  
13 this is what you're supposed to be doing.  
14 There are a lot of things that - decision that  
15 people make off the cuff that's not ever put in  
16 writing. And that they would tell whoever's  
17 here at the time. And I guess expect that  
18 information to get disseminated throughout the  
19 institution. And it's not. That's not being  
20 done. That's not being done. So you have a  
21 lot of - we have a lot of new staff here. And  
22 a lot of them are falling between the cracks  
23 because they just aren't getting information to  
24 them in a manner in which they should.  
25 MR. [REDACTED]: On what you just mentioned.

1 So you're saying that there's orders or  
2 decisions coming down from up above? And it's  
3 not being properly communicated out.

4 MS. [REDACTED]: This is how. This is  
5 how this place has always been. You -. People  
6 in-in-in-in um positions will require the  
7 people up under them to carry their load rather  
8 than them carrying their own load. When if -  
9 if I'm a lieutenant, my duties and  
10 responsibilities and authority end at a certain  
11 level. At that point, the captain and above  
12 takes over. A lot of times, you don't see  
13 that. They expect you to do your job and their  
14 job as well. We can't -. There are certain  
15 decisions that we can't make. If it was up to  
16 me, Epstein would have been up on 10 South. So  
17 those are the type of decisions where you tell  
18 people that these things are wrong. You give  
19 them intel about certain things. And here we  
20 are. We done found a loaded gun in the  
21 institution. That - those type things should  
22 never happen. Never happen.

23 MR. [REDACTED]: That's all I have.

24 MR. [REDACTED]: Anything else?

25 MR. [REDACTED]: Nope.

1 MS. [REDACTED]: You have Thomas and  
2 Noel that were left holding the bag for  
3 something that a decision that should have been  
4 made by the staff way above their level in  
5 regard to Epstein and what was best for him  
6 during his time here. It may not have saved  
7 his life, but we certainly would have been in a  
8 better position if he had decided to take it  
9 somewhere.

10 MR. [REDACTED]: But do you agree that  
11 counts and rounds need to be conducted? If  
12 people are falsifying counts and rounds -?

13 MS. [REDACTED]: I'm not. I don't  
14 know anything about --

15 MR. [REDACTED]: If --.

16 MS. [REDACTED]: -- people falsifying  
17 counts --

18 MR. [REDACTED]: But if --

19 MS. [REDACTED]: -- but yes --

20 MR. [REDACTED]: -- they were.

21 MS. [REDACTED]: -- counts and rounds  
22 need to be done. They're important.

23 MR. [REDACTED]: Right. And if they were  
24 aware that there was a cellmate requirement,  
25 they should have reported the matter to someone

1 like yourself.

2 MS. [REDACTED]: Yeah, but you have  
3 other people that are - were responsible for  
4 disseminating that information to -

5 MR. [REDACTED]: Okay.

6 MS. [REDACTED]: -- everybody to make  
7 sure that everybody had that information. And  
8 everybody knew that.

9 MR. [REDACTED]: Right. And that --

10 MS. [REDACTED]: And they also had -.

11 MR. [REDACTED]: -- I guess like yourself,  
12 you received an email but you didn't read it.  
13 So that's where there's one of those things  
14 that yeah, there's definitely things to work  
15 out. But I'm just saying when you say, like  
16 there are things that sound like they were  
17 probably done wrong here like counts and rounds  
18 aren't being conducted. People aren't  
19 reporting information up the chain if they're  
20 being told to do so. But as well as everything  
21 else, you're saying as an institution.

22 MS. [REDACTED]: When I first came  
23 into the Bureau, you didn't even have email.  
24 So how was - and you still now is no different  
25 than back then. You still have inmates who was

1 with in potential danger. The same situations  
2 that existed in the institutions then. It's  
3 the same instances that exist now. So if back  
4 then they were able to make sure everybody was  
5 one the same page and that information was  
6 disseminated and it got to everybody. Why  
7 should it be any different here? You can't  
8 rely on an inmate because first of all, in  
9 order to know, you don't just send out. That's  
10 the whole purpose of walking and talking. To  
11 disseminate information that way. Because  
12 you're never guaranteed that when you send out  
13 an email that somebody is going to read it. I  
14 have a ton of emails on my computer at home  
15 that I don't read. So nothing is guaranteed.  
16 You have to know. When you're in charge and  
17 you're running something, you-you-you-you need  
18 to know that whatever you put out there, that  
19 if it's that important, if it's that important,  
20 why are you sending it through an email anyway.  
21 Why aren't you calling somebody on the phone?  
22 Back it up. Call people on the phone. Make  
23 sure everybody knows.

24 MR. [REDACTED]: I think the purpose is to  
25 put it in writing. But yeah, so email but also

1 verify verbally.

2 MS. [REDACTED]: You need to verify  
3 that if you're sending those emails to  
4 pertinent people who should have access to that  
5 information that everybody knows about it.

6 MR. [REDACTED]: Do you all have all staff  
7 like we're lieutenants are all present where  
8 they can verbalize something to you? Is that  
9 done here?

10 MS. [REDACTED]: Do we have what?

11 MR. [REDACTED]: So you're saying that not  
12 only an email but people should verbalize it.  
13 But there's a ton of people that need to know  
14 things. So is there a process in place where  
15 someone like the captain, say? If the warden  
16 tells the captain make sure he has a cellmate,  
17 is there a process in place where the captain  
18 can get in front of all the lieutenants and  
19 tell them this? Or is that - is there -?

20 MS. [REDACTED]: The captain has  
21 access to every lieutenant here. The captain's  
22 office is -.

23 MR. [REDACTED]: But how would he know  
24 about verbalizing? We have to tell each  
25 individual lieutenant.

1 MS. [REDACTED]: He should.

2 MR. [REDACTED]: So each --

3 MS. [REDACTED]: If it's that  
4 important.

5 MR. [REDACTED]: -- lieutenant he needs to  
6 specifically tell? And were you - being the  
7 ops lieutenant - were you one of the people he  
8 should have specifically told?

9 MS. [REDACTED]: He should have told  
10 all of us. Not just time. He should have told  
11 all of us.

12 MR. [REDACTED]: SO if you were -.

13 MS. [REDACTED]: Um, psychology should  
14 have made sure that we all knew that.

15 MR. [REDACTED]: And this goes to like  
16 since you didn't know. You have an email but  
17 no one verbalized it. Who should have told  
18 you? Whose ultimate responsibility do you  
19 believe it was that hey that's the position  
20 that really should have informed me. I'm the  
21 ops lieutenant. I should have known that he  
22 needed an inmate. Who was the person that  
23 should have told you that verbally?

24 MS. [REDACTED]: Everybody who had  
25 stake in making sure.

1 MR. [REDACTED]: But you relay believe  
2 that every single one of this person should  
3 have verbally told you this?

4 MS. [REDACTED]: They should have made  
5 sure that enough people knew whereby everybody  
6 should have known.

7 MR. [REDACTED]: So this is what we talked  
8 about. Everybody did know but you. So who  
9 should have told you?

10 MS. [REDACTED]: No.

11 MR. [REDACTED]: The lieutenants. The  
12 lieutenants --

13 MS. [REDACTED]: Everybody didn't  
14 know.

15 MR. [REDACTED]: -- that were involved  
16 here all knew that he was required to have an  
17 inmate. You're the only one who said that you  
18 didn't know. So my question to you is they all  
19 knew. Who should have been the one to tell  
20 you?

21 MS. [REDACTED]: The same people that  
22 told them. Just tbc they read the email  
23 doesn't mean that before they read the email,  
24 they wasn't aware.

25 MR. [REDACTED]: Okay.

1 MS. [REDACTED]: I mean that doesn't  
2 say that.

3 MR. [REDACTED]: No. I do believe that  
4 most of these people were told verbally. So  
5 that's what I'm saying. Who should have  
6 verbally told you?

7 MS. [REDACTED]: Who verbally told  
8 them?

9 MS. [REDACTED]: So whoever verbally  
10 told them should have verbally told you?

11 MS. [REDACTED]: I mean -.

12 MR. [REDACTED]: Okay.

13 MS. [REDACTED]: A number of -.  
14 You've got -. Psychology has a stake --

15 MR. [REDACTED]: Sure.

16 MS. [REDACTED]: -- in whether or not  
17 he has a cellie. Right?

18 MR. [REDACTED]: Do you understand what  
19 I'm saying? I'm saying like psychology, the  
20 captain, the warden, the AW. They can't all  
21 tell you the same thing. It should be on  
22 person. I'm assuming that should have told  
23 you.

24 MS. [REDACTED]: There's never one  
25 person that disseminates information. That's

1 how we all know what happens here. When you  
2 don't have one person -.

3 MR. [REDACTED]: Okay.

4 MS. [REDACTED]: One person that would  
5 mean that that one person would have to work  
6 every shift to let everybody know what's going  
7 on. But if you see me here, and you know that  
8 that's important. Then you should at least  
9 make the effort to hey, did you know?

10 MR. [REDACTED]: Right.

11 MS. [REDACTED]: I mean we're not -.

12 MR. [REDACTED]: And bin g that the  
13 captain doesn't you work when you work at  
14 nights especially. It sounds like from July  
15 30th to the time that this happened.

16 MR. [REDACTED]: At some point in time.

17 MR. [REDACTED]: So would that have been  
18 the other ops lieutenant? His requirement to  
19 tell you.

20 MS. [REDACTED]: At some point in  
21 time. I'm sure. The captain seen me between  
22 July 30th and every day at some point  
23 thereafter.

24 MR. [REDACTED]: Okay. So by saying the  
25 captain, does that mean you believe the captain

1 is the one who should have told you that?

2 MS. [REDACTED]: If the captain knew,  
3 the captain should have made sure that we knew.

4 MR. [REDACTED]: Okay.

5 MS. [REDACTED]: You know, they're the  
6 - they're the - they're the - they're the  
7 chain.

8 MR. [REDACTED]: And that's my question is  
9 who is that chain of command? Who was  
10 responsible for letting you know? The captain?

11 MS. [REDACTED]: If he knew.

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

13 MS. [REDACTED]: He should have  
14 ensured. He should have mad ensure that we all  
15 knew.

16 MR. [REDACTED]: Alright.

17 MS. [REDACTED]: That we were aware of  
18 that information. That we knew.

19 MR. [REDACTED]: So the person that should  
20 have told you is the captain? That's what I'm  
21 getting at.

22 MS. [REDACTED]: Whoever was  
23 responsible for ensuring that inmate's safety  
24 and wellbeing. Whoever had a stake in that  
25 should have been making sure that everybody

1 knew. Whether it was the warden making sure.

2 MR. [REDACTED]: Sure. So if the warden  
3 contacted the captain and told the captain hey  
4 make sure all your lieutenants know -.

5 MS. [REDACTED]: Whether it was the  
6 warden telling the AWs, the AWs telling the  
7 captains and telling them to tell us.

8 MR. [REDACTED]: But the person above you.  
9 So let's say. Take this as like what I'm  
10 telling you.

11 MS. [REDACTED]: It could have been -.  
12 It could have been another officer, sir, that  
13 knew and didn't.

14 MR. [REDACTED]: Okay. And that's my  
15 question.

16 MS. [REDACTED]: And could have said  
17 hey.

18 MR. [REDACTED]: So in this instance, if  
19 the warden told the captain, the captain you  
20 know telling the lieutenants. Should have it  
21 been both your relieving ops lieutenant as well  
22 as the captain are the ones that should have  
23 been telling you this?

24 MS. [REDACTED]: Which one? Which  
25 relieving?

1 MR. [REDACTED]: Well in this case it  
2 would have been [REDACTED].

3 MS. [REDACTED]: I mean, but you said  
4 the email came out on July 30th.

5 MR. [REDACTED]: Sure. But I'm saying -.

6 MS. [REDACTED]: So it could have been  
7 anybody between --

8 MR. [REDACTED]: But then to back up  
9 [REDACTED] --

10 MS. [REDACTED]: -- then forward.

11 MR. [REDACTED]: -- [REDACTED] should have told  
12 [REDACTED]. [REDACTED] told you. Or should have the  
13 captain told all three?

14 MS. [REDACTED]: We should have had -  
15 we should have known that way, way before that  
16 day.

17 MR. [REDACTED]: Well they did know.

18 MS. [REDACTED]: Okay.

19 MR. [REDACTED]: And so that's my question  
20 is for you.

21 MS. [REDACTED]: Okay.

22 MR. [REDACTED]: So they knew, the captain  
23 knew. The warden knew. You didn't know. Who  
24 should have told you? Should have your  
25 relieving ops lieutenants told you? Or should

1 have your captain told you?

2 MS. [REDACTED]: Whoever knew that day  
3 that he was left without a cellie. And who  
4 came in contact with me should have you know.

5 MR. [REDACTED]: Okay. So the highest  
6 level basically the highest officer. So if  
7 [REDACTED] knew it would have been - and he didn't  
8 tell the captain, it would have been his  
9 responsibility to either told the captain and  
10 the ops lieutenant next to him. And that ops  
11 lieutenant should have told the captain or you.  
12 The point being the information never go to  
13 you.

14 MS. [REDACTED]: I never was told.

15 MR. [REDACTED]: Sure. No. And that's  
16 why.

17 MS. [REDACTED]: I never was told that  
18 he didn't have a cellie on that day.

19 MR. [REDACTED]: Okay.

20 MS. [REDACTED]: But as far as what  
21 somebody supposed to do is clearly left up to  
22 that individual and what their knowledge is and  
23 how much they know. How long they've been on  
24 the job and how well they do their job and so  
25 forth and so on.

1 MR. [REDACTED]: Okay.

2 MS. [REDACTED]: All of us don't  
3 necessarily handle things all the same way.  
4 We're not all - we don't all think alike. We  
5 don't share the same brain. So how one person  
6 handle it is not necessarily how somebody else  
7 would have handled it. But -.

8 MR. [REDACTED]: Sure. But everybody has  
9 their duties and responsibilities. And that's  
10 it.

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

12 MR. [REDACTED]: Alright.

13 MR. [REDACTED]: Just one left. In regard to  
14 August 9th and 10th. Is there anything that we  
15 forgot that we didn't ask or that you think we  
16 should have asked about? Any important details  
17 that we might have missed?

18 MS. [REDACTED]: Concerning Epstein?

19 MR. [REDACTED]: Concerning Epstein.

20 MR. [REDACTED]: No.

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: Not that I can think  
23 of.

24 MR. [REDACTED]: That's it.

25 MR. [REDACTED]: Alright. It is currently

1 12:39 p.m. on June 14, 2021. This is Senior  
2 Special Agent [REDACTED] and I am  
3 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]



---

Marci Bratton, Transcriber

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