

DIGITALLY RECORDED  
SWORN STATEMENT  
OF

[REDACTED]

OIG CASE #:  
2019-010614

DEPARTMENT OF JUSTICE  
OFFICE OF THE INSPECTOR GENERAL  
AUGUST 5, 2021

RESOLUTE DOCUMENTATION SERVICES  
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Agoura Hills, CA 91301  
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APPEARANCES:

OFFICE OF THE INSPECTOR GENERAL

BY: [REDACTED]  
BY: [REDACTED]

WITNESS:

[REDACTED]

OTHER APPEARANCES:

NONE

1 MR. [REDACTED]: This is special agent [REDACTED]  
2 [REDACTED]. The recorder is now on. My name is  
3 [REDACTED]. I'm a special agent with the  
4 U.S. Department of Justice, Office of the  
5 Inspector General, New York Field Office, and  
6 these are my credentials.  
7 MR. [REDACTED]: All right.  
8 MR. [REDACTED]: This interview is with  
9 Federal Bureau of Prisons employee, [REDACTED]  
10 [REDACTED]. It is being conducted as part of an  
11 official U.S. Department of Justice, Office of  
12 the Inspector General investigation. Today is  
13 August 5th, 2021, and the time is 6:19 p.m.  
14 This interview is being conducted at the  
15 Metropolitan Correctional Center, MCC, 150 Park  
16 Row, New York City. Also present is DOJ/OIG  
17 Senior Special Agent, [REDACTED]. This  
18 interview will be recorded by me, Special Agent  
19 [REDACTED]. Could everyone please identify  
20 themselves for the record, and spell your last  
21 name? To start, again, I am DOJ/OIG Special  
22 Agent, [REDACTED].  
23 MR. [REDACTED]: My name is senior special  
24 agent, [REDACTED], with the U.S.  
25 Department of Justice, Office of the Inspector

1 General. [REDACTED] And these are  
2 my credentials.  
3 MR. [REDACTED]: Okay. And my name is [REDACTED]  
4 [REDACTED]. Senior Officer with the Federal Bureau  
5 of Prisons.  
6 MR. [REDACTED]: And spell your last name,  
7 too.  
8 MR. [REDACTED]: [REDACTED]  
9 MR. [REDACTED]: Thank you, sir.  
10 MR. [REDACTED]: This is an official DOJ/OIG  
11 investigation into the death of inmate, Jeffrey  
12 Epstein, and the surrounding circumstances.  
13 You are being asked to voluntarily provide  
14 answers to our questions. Will you agree to a  
15 voluntary interview with the DOJ/OIG?  
16 MR. [REDACTED]: Yes.  
17 MR. [REDACTED]: Please review DOJ/OIG form  
18 III-226/2. It states, the United States  
19 Department of Justice, Office of the Inspector  
20 General, Warnings and Assurances to Employee  
21 Requested to Provide Information on a Voluntary  
22 Basis. "You are being asked to provide  
23 information as part of an investigation being  
24 conducted by the Office of the Inspector  
25 General. This investigation is being conducted

1 pursuant to the Inspector General Act of 1978,  
 2 as amended. This investigation pertains to job  
 3 performance failure, security failure, and  
 4 false certifications. This is a voluntary  
 5 interview. Accordingly --  
 6 MR. [REDACTED]: Mm-hmm.  
 7 MR. [REDACTED]: -- you do not have to answer  
 8 any questions. No disciplinary action will be  
 9 taken against you if you choose not to answer  
 10 any questions.  
 11 MR. [REDACTED]: Uh-huh.  
 12 MR. [REDACTED]: Any statement you furnish may  
 13 be used as evidence in any future criminal  
 14 proceedings, or agency disciplinary  
 15 proceedings, or both."  
 16 MR. [REDACTED]: Uh-huh.  
 17 MR. [REDACTED]: The waiver states, "I  
 18 understand the Warnings and Assurances stated  
 19 above and I am willing to make a statement and  
 20 answer questions. No promises or threats have  
 21 been made to me, and no pressure or coercion of  
 22 any kind has been used against me." Please  
 23 review the form. If you understand and agree,  
 24 sign your name, and print your name right below  
 25 it.

1 voluntary interview --  
 2 MR. [REDACTED]: Yeah.  
 3 MR. [REDACTED]: -- and you can end the  
 4 interview.  
 5 MR. [REDACTED]: Like --.  
 6 MR. [REDACTED]: You don't have to answer if  
 7 you don't want to.  
 8 MR. [REDACTED]: It's been like this every  
 9 time.  
 10 MR. [REDACTED]: Yes.  
 11 MR. [REDACTED]: Yeah.  
 12 MR. [REDACTED]: Before starting the  
 13 interview, I would like to place you under  
 14 oath. Can you please raise your right hand?  
 15 Mr. [REDACTED], do you swear to tell the truth and  
 16 nothing but the truth during this interview?  
 17 MR. [REDACTED]: Yes.  
 18 MR. [REDACTED]: Thank you. You can put your  
 19 hand down. Mr. [REDACTED], please let me know if  
 20 you do not understand any questions I ask, and  
 21 I will try and repeat it, or try to rephrase it  
 22 for you.  
 23 MR. [REDACTED]: Mm-hmm.  
 24 MR. [REDACTED]: Okay. I just wanted to show  
 25 the recorder is right there.

1 MR. [REDACTED]: Here's a pen for you, if  
 2 you need one.  
 3 MR. [REDACTED]: So, do I need a union rep for  
 4 this?  
 5 MR. [REDACTED]: You could have one, if  
 6 you want, but like we mentioned, it's going to  
 7 be primarily to review the statement that you  
 8 already provided.  
 9 MR. [REDACTED]: Okay.  
 10 MR. [REDACTED]: And just to ask for some  
 11 clarification on some of the information that  
 12 you provided.  
 13 MR. [REDACTED]: Let's get this over with.  
 14 MR. [REDACTED]: Thank you for signing. This  
 15 is Agent [REDACTED]. I'm going to put the date as  
 16 August 5th, 2021. And the time is 6:22 p.m.  
 17 The place is MCC, New York. I'm signing at the  
 18 line for signature of the Office of the  
 19 Inspector General, Special Agent. Senior  
 20 Special Agent, would you sign it?  
 21 MR. [REDACTED]: This is [REDACTED]  
 22 [REDACTED]. I'm signing as the witness.  
 23 MR. [REDACTED]: Did you understand the form?  
 24 MR. [REDACTED]: Yes.  
 25 MR. [REDACTED]: You understand it's a

1 MR. [REDACTED]: Yup.  
 2 MR. [REDACTED]: What is your current home  
 3 address?  
 4 MR. [REDACTED]: My current home address would  
 5 be [REDACTED]  
 6 MR. [REDACTED]: Where is that?  
 7 MR. [REDACTED]: In [REDACTED]  
 8 MR. [REDACTED]: What part?  
 9 MR. [REDACTED]: [REDACTED]  
 10 MR. [REDACTED]: [REDACTED] Okay.  
 11 What is your date of birth?  
 12 MR. [REDACTED]: [REDACTED]  
 13 MR. [REDACTED]: What is your social security  
 14 number?  
 15 MR. [REDACTED]: [REDACTED]  
 16 MR. [REDACTED]: What is your current phone  
 17 number?  
 18 MR. [REDACTED]: [REDACTED]  
 19 MR. [REDACTED]: What is your highest level of  
 20 education?  
 21 MR. [REDACTED]: High school with some college.  
 22 MR. [REDACTED]: What high school?  
 23 MR. [REDACTED]: [REDACTED]  
 24 [REDACTED]  
 25 MR. [REDACTED]: Okay. And some college. Did

1 you earn a degree?  
 2 MR. [REDACTED]: No. I haven't finished that.  
 3 I started in [REDACTED]  
 4 [REDACTED] And then, I did online. So,  
 5 and now, I'm working here.  
 6 MR. [REDACTED]: What major are you following?  
 7 MR. [REDACTED]: It was criminal justice.  
 8 MR. [REDACTED]: Were you planning - you were  
 9 going to finish that up, you said?  
 10 MR. [REDACTED]: I want to.  
 11 MR. [REDACTED]: Okay. Do you have any  
 12 military service?  
 13 MR. [REDACTED]: Yes.  
 14 MR. [REDACTED]: What branch?  
 15 MR. [REDACTED]: [REDACTED]  
 16 MR. [REDACTED]: Honorably discharged?  
 17 MR. [REDACTED]: Yes.  
 18 MR. [REDACTED]: When did you serve?  
 19 MR. [REDACTED]: [REDACTED] to [REDACTED]  
 20 MR. [REDACTED]: And what grade were you when  
 21 you left?  
 22 MR. [REDACTED]: I was an E4 when I left.  
 23 MR. [REDACTED]: Okay. How long have you  
 24 served with the Federal Bureau of Prisons?  
 25 MR. [REDACTED]: Approximately [REDACTED] years now.

1 MR. [REDACTED]: Okay. What is your current  
 2 position with the MCC?  
 3 MR. [REDACTED]: Senior Officer.  
 4 MR. [REDACTED]: Who is your current  
 5 supervisor?  
 6 MR. [REDACTED]: The Operations Lieutenant.  
 7 MR. [REDACTED]: What's the name?  
 8 MR. [REDACTED]: I think [REDACTED] is the  
 9 Operations tonight.  
 10 MR. [REDACTED]: Operations Lieutenant. Do  
 11 you -?  
 12 MR. [REDACTED]: So, what do you mean by  
 13 that? It's every day, it's a different one, or  
 14 (Indiscernible \*00:06:15)?  
 15 MR. [REDACTED]: It can very well be. So, the  
 16 lieutenants sometimes will work on a different  
 17 schedule than us. So, our schedule, like, a  
 18 schedule might not line up, like, tonight I'm  
 19 working, [REDACTED] is working right now, but some -  
 20 like, yesterday, it was [REDACTED] that was  
 21 working.  
 22 MR. [REDACTED]: Sure.  
 23 MR. [REDACTED]: So, you know, you never know.  
 24 MR. [REDACTED]: Okay.  
 25 MR. [REDACTED]: Do you recall being

1 MR. [REDACTED]: What was your enter on duty  
 2 date?  
 3 MR. [REDACTED]: It can be a month and  
 4 year.  
 5 MR. [REDACTED]: Yeah.  
 6 MR. [REDACTED]: Yeah. It was [REDACTED] [REDACTED]  
 7 [REDACTED] Yeah. Because I just made [REDACTED] years.  
 8 But I could get that, as --  
 9 MR. [REDACTED]: Oh, that's easy.  
 10 MR. [REDACTED]: -- a paper.  
 11 MR. [REDACTED]: It's fine. It's just a  
 12 know approximately when you started.  
 13 MR. [REDACTED]: Okay. And what did you prior  
 14 to working at the Metropolitan Correctional  
 15 Center?  
 16 MR. [REDACTED]: [REDACTED] Cleaning job. And car  
 17 dealerships. Until I landed this.  
 18 MR. [REDACTED]: Okay. And what year did you  
 19 start here, again?  
 20 MR. [REDACTED]: [REDACTED]  
 21 MR. [REDACTED]: With the MCC?  
 22 MR. [REDACTED]: Yes.  
 23 MR. [REDACTED]: Have you been here at the MCC  
 24 the whole time?  
 25 MR. [REDACTED]: Yes.

1 previously interviewed by the FBI and OIG  
 2 regarding the Epstein investigation?  
 3 MR. [REDACTED]: Yes.  
 4 MR. [REDACTED]: I'm going to read you a  
 5 summary of the FBI's notes. The reason, these  
 6 notes belong to the FBI, but because the OIG  
 7 was present, we do have the notes along with  
 8 you, too. So, I'm going to read it --  
 9 MR. [REDACTED]: Uh-huh.  
 10 MR. [REDACTED]: -- just tell me if there's  
 11 any corrections, or --  
 12 MR. [REDACTED]: Okay.  
 13 MR. [REDACTED]: -- anything that's missing.  
 14 MR. [REDACTED]: Okay.  
 15 MR. [REDACTED]: I'm going to go right into  
 16 it. "[REDACTED] informed that he has been a guard  
 17 with the Bureau" -.  
 18 MR. [REDACTED]: Yeah, yeah. Start from  
 19 the beginning.  
 20 MR. [REDACTED]: All right. So, "On September  
 21 25, 2019, at approximately 11:30 hours, the  
 22 undersigned, along with Special Agent [REDACTED]  
 23 [REDACTED] of the Office of the Inspector  
 24 General, Special Agent [REDACTED] of the  
 25 Federal Bureau of Investigation, and Assistant

1 United States Attorneys, for the southern  
2 district of New York, [REDACTED], and  
3 [REDACTED] did interview Federal Bureau of  
4 Prisons Correctional Guard, [REDACTED].  
5 Date of birth: [REDACTED] at the Southern  
6 District of New York. This interview was  
7 conducted in the presence of [REDACTED] attorney.  
8 [REDACTED] informed that he has been a guard with  
9 the Bureau of Prisons (BOP) for approximately  
10 three years, all of which have been at the  
11 Metropolitan Correctional Center."

12 MR. [REDACTED]: Mm-hmm.

13 MR. [REDACTED]: So, are you represented  
14 in this matter? Are you represented in this  
15 matter?

16 MR. [REDACTED]: Yeah. I guess so. I mean, I  
17 had a lawyer --

18 MR. [REDACTED]: Yeah. So, this is --

19 MR. [REDACTED]: -- then.

20 MR. [REDACTED]: -- so, I do want to make  
21 sure you understand this is a voluntary  
22 interview. I know that you had an attorney  
23 there. Are you good with us reviewing this  
24 report, and -?

25 MR. [REDACTED]: Yeah. We could review it real

1 was number one? Are you pointing to [REDACTED]

2 [REDACTED]

3 MR. [REDACTED]: Yeah.

4 MR. [REDACTED]: Okay.

5 MR. [REDACTED]: Now, was [REDACTED] - was  
6 he non-custody, though?

7 MR. [REDACTED]: Yeah.

8 MR. [REDACTED]: So, being that he was  
9 non-custody, would you actually be kind of the  
10 OIC, being that you were, like, were you more  
11 senior, or -?

12 MR. [REDACTED]: No. Actually, he has more  
13 time in the Bureau than I do.

14 MR. [REDACTED]: He does? Okay. So, he  
15 would be kind of responsible, at the time,  
16 then?

17 MR. [REDACTED]: Yeah. Like, the way it's a  
18 very tricky thing, the way that that works  
19 here.

20 MR. [REDACTED]: Okay.

21 MR. [REDACTED]: You know, so, even if -  
22 because he has more time than me, he's not -  
23 because he started in custody - he has more  
24 time than me, so I guess when they gave him the  
25 overtime, they just, like, filled in the slot.

1 quick, and just get this over with.

2 MR. [REDACTED]: Okay.

3 MR. [REDACTED]: "[REDACTED] informed that he has  
4 completed all the basic and required training  
5 for being a guard in the BOP, and that he is  
6 currently the senior officer in the Special  
7 Housing Unit (SHU)."

8 MR. [REDACTED]: Well, then I was.

9 MR. [REDACTED]: At that point. Okay. And  
10 August 2019?

11 MR. [REDACTED]: Mm-hmm.

12 MR. [REDACTED]: Okay. Did you -?

13 MR. [REDACTED]: I wasn't the number one  
14 officer that night, but -.

15 MR. [REDACTED]: Who was that number one  
16 officer?

17 MR. [REDACTED]: I'm not even sure.

18 MR. [REDACTED]: Here's the daily  
19 assignment roster from that night.

20 MR. [REDACTED]: Can you see it, by looking at  
21 the -? We provided the MCC New York roster for  
22 August 9th, 2019.

23 MR. [REDACTED]: Okay. He was on OT. Yeah. I  
24 was the number three man.

25 MR. [REDACTED]: You were number three. Who

1 MR. [REDACTED]: Okay.

2 MR. [REDACTED]: You know, I worked in there  
3 every day, at that point in time, but what am I  
4 supposed to tell the man, like, yo, you're  
5 number one, what am I supposed to anybody?

6 MR. [REDACTED]: Sure. So, technically,  
7 because he's number one, he was the OIC?

8 MR. [REDACTED]: Yeah.

9 MR. [REDACTED]: I gotcha.

10 MR. [REDACTED]: But, you know, that's -.

11 MR. [REDACTED]: Have you received MCC  
12 refresher training? Annual refresher training?

13 MR. [REDACTED]: In SHU?

14 MR. [REDACTED]: In SHU, MCC training, and  
15 also in SHU.

16 MR. [REDACTED]: Oh, like, oh, yeah, the annual  
17 --

18 MR. [REDACTED]: Yeah.

19 MR. [REDACTED]: -- training or whatever?

20 MR. [REDACTED]: Yeah.

21 MR. [REDACTED]: Like, yeah. I just did that  
22 on the computer this year.

23 MR. [REDACTED]: Ask him --

24 MR. [REDACTED]: Did you have -.

25 MR. [REDACTED]: -- you know, you want to

1 ask him about at the time.  
 2 MR. [REDACTED]: I'm going back. Yeah. In  
 3 2019, did you receive the annual MCC refresher  
 4 training?  
 5 MR. [REDACTED]: I believe so. I don't even  
 6 remember at this point, but I could look it up  
 7 in the computer.  
 8 MR. [REDACTED]: Everybody pretty much  
 9 does every year, though. Correct?  
 10 MR. [REDACTED]: Yeah.  
 11 MR. [REDACTED]: So, you (Indiscernible  
 12 \*00:10:10).  
 13 MR. [REDACTED]: But we're supposed to. But  
 14 sometimes, we'll be off.  
 15 MR. [REDACTED]: Sure.  
 16 MR. [REDACTED]: Do you recall, in 2019, if  
 17 you received the SHU training?  
 18 MR. [REDACTED]: Quarterly training.  
 19 MR. [REDACTED]: Quarterly training.  
 20 MR. [REDACTED]: In order to your -. You  
 21 were, like, assigned to the SHU.  
 22 MR. [REDACTED]: Yeah. At some point in time,  
 23 I probably did. What the dates are, I don't  
 24 remember.  
 25 MR. [REDACTED]: Okay. What about the suicide

1 MR. [REDACTED]: Yes.  
 2 MR. [REDACTED]: Can you let me know who else  
 3 worked with you during that shift? According to  
 4 when you - if you can refer to the roster.  
 5 MR. [REDACTED]: Okay. For 2:00 to 10:00, this  
 6 is me right here, coming in at 2:00 to 10:00.  
 7 And so, when I came in, some of these people  
 8 from the dayshift was still here.  
 9 MR. [REDACTED]: Can you - because we're  
 10 recording --  
 11 MR. [REDACTED]: Oh.  
 12 MR. [REDACTED]: -- say the names that you're  
 13 pointing to.  
 14 MR. [REDACTED]: Okay. So, when I came in to  
 15 do SHU number three, you had [REDACTED], [REDACTED],  
 16 [REDACTED] still working. And then, at 4:00, when  
 17 the shift change came on, this is when these  
 18 individuals came on, [REDACTED], [REDACTED]. Well,  
 19 [REDACTED] was already there, I believe. Because she  
 20 got stuck for overtime that night. But that's  
 21 when they came in. And then, nobody was  
 22 assigned to SHU four, after 4:00.  
 23 MR. [REDACTED]: So, you started 2:00 p.m.?  
 24 MR. [REDACTED]: I started at 2:00 p.m.  
 25 MR. [REDACTED]: And during the time that you

1 prevention training? In 2019.  
 2 MR. [REDACTED]: That would have been part  
 3 of the SHU.  
 4 MR. [REDACTED]: Part of the SHU training.  
 5 MR. [REDACTED]: Yeah, as well as part of  
 6 --  
 7 MR. [REDACTED]: Yeah.  
 8 MR. [REDACTED]: -- the annual refresher  
 9 training.  
 10 MR. [REDACTED]: Yeah. I've seen that on the  
 11 computer before, too. Now, in 2019, I don't  
 12 remember. It was --  
 13 MR. [REDACTED]: Sure.  
 14 MR. [REDACTED]: -- It was too --.  
 15 MR. [REDACTED]: Okay. We're going to go --  
 16 MR. [REDACTED]: Maybe it was something that  
 17 was mentioned in the course, that --  
 18 MR. [REDACTED]: Right. Yeah, yeah.  
 19 MR. [REDACTED]: -- it's 2021, right?  
 20 MR. [REDACTED]: Yeah, yeah, yeah, yeah.  
 21 MR. [REDACTED]: I understand. "When asked  
 22 about his activities for August 9th, 2019,  
 23 [REDACTED] replied, 'I assumed that's Epstein day.'  
 24 [REDACTED] informed that, as far as he can recall,  
 25 he worked the 2:00 p.m. by 10:00 p.m. shift."

1 started, [REDACTED], [REDACTED] - you said [REDACTED],  
 2 [REDACTED], and [REDACTED] was still there?  
 3 MR. [REDACTED]: Mm-hmm.  
 4 MR. [REDACTED]: And at 4:00 p.m., [REDACTED]  
 5 came on?  
 6 MR. [REDACTED]: [REDACTED] left when I came in,  
 7 because he's 1400. His time ended.  
 8 MR. [REDACTED]: Okay. And then, at 4:00  
 9 p.m., [REDACTED] came in?  
 10 MR. [REDACTED]: Yeah. He came up for  
 11 overtime. [REDACTED] came in for her regular shift.  
 12 MR. [REDACTED]: Okay. I'm going to continue  
 13 on.  
 14 MR. [REDACTED]: Mm-hmm.  
 15 MR. [REDACTED]: And I'm going to read that  
 16 line again. "[REDACTED] informed that, as far as he  
 17 can recall, he worked a 2:00 p.m. by 10:00 p.m.  
 18 shift, and did not see Epstein for the majority  
 19 of his shift because Epstein was with his  
 20 lawyers all day."  
 21 MR. [REDACTED]: Yes.  
 22 MR. [REDACTED]: "[REDACTED] first recalls seeing  
 23 Epstein at approximately 8:00 p.m., and at that  
 24 time, [REDACTED] informed BOP guard [REDACTED]" -  
 25 that's [REDACTED]

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: "That Epstein needed to make  
 3 a phone call. [REDACTED] informed that he made the  
 4 -."  
 5 MR. [REDACTED]: That's backwards.  
 6 MR. [REDACTED]: Go ahead. Clarify that for  
 7 me.  
 8 MR. [REDACTED]: What happened was is, [REDACTED]  
 9 informed me that he needed to make a phone  
 10 call. That's, like, because I can't make that  
 11 determination, and that's not an officer,  
 12 that's a unit manager.  
 13 MR. [REDACTED]: So, [REDACTED] is a unit  
 14 manager?  
 15 MR. [REDACTED]: Yeah.  
 16 MR. [REDACTED]: Do you know his first name,  
 17 offhand?  
 18 MR. [REDACTED]: No.  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: [REDACTED]? Is that a yes?  
 21 MR. [REDACTED]: Yes.  
 22 MR. [REDACTED]: Okay.  
 23 MR. [REDACTED]: That's all right.  
 24 MR. [REDACTED]: Sorry.  
 25 MR. [REDACTED]: No problem.

1 the judge or anybody tell him that, like, yeah,  
 2 he gets to make a phone call or whatever. So,  
 3 okay, no problem. You know, you're owing me at  
 4 this point in time or whatever. So, now, at  
 5 that point in time, there was a lot of stuff  
 6 going on. That, I do remember. There was a  
 7 lot of things going on. Two other inmates  
 8 attempted suicides, and, you know -  
 9 MR. [REDACTED]: We'll come to -. I'm going  
 10 to go through that, too.  
 11 MR. [REDACTED]: Okay.  
 12 MR. [REDACTED]: You said, so, approximately  
 13 what time did Epstein get brought back? Do you  
 14 recall?  
 15 MR. [REDACTED]: It was 8:00 something, but it  
 16 was, like, very close to, like, the end of the  
 17 day. It was locking time. The day was done.  
 18 Because Epstein usually did that. He would  
 19 stay with his lawyers from the time in the  
 20 morning, to the end, when they couldn't stay no  
 21 more.  
 22 MR. [REDACTED]: Okay.  
 23 MR. [REDACTED]: So, he would wait all the way  
 24 to the very end. And he came back after the  
 25 legal visits were done, that's around the time

1 MR. [REDACTED]: That's only because of  
 2 this.  
 3 MR. [REDACTED]: Yeah, yeah.  
 4 MR. [REDACTED]: You know, picking it up.  
 5 MR. [REDACTED]: So --  
 6 MR. [REDACTED]: I knew what you meant.  
 7 MR. [REDACTED]: -- that night, were you in  
 8 the SHU when this happened? Did [REDACTED]  
 9 approach you in the SHU?  
 10 MR. [REDACTED]: Yes.  
 11 MR. [REDACTED]: So, that night, when that  
 12 happened, I'm running around, as I normally do,  
 13 doing things in the SHU. I get the call on the  
 14 radio. You know, you've got to return, coming  
 15 into SHU, or whatever. So, when he gets  
 16 brought in or whatever --  
 17 MR. [REDACTED]: Who gets brought in?  
 18 MR. [REDACTED]: -- Epstein.  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: Epstein gets brought into the  
 21 SHU. Just like normal, you know, like, you  
 22 take them, pat search them, and everything like  
 23 that, before you put them in the cell. So,  
 24 [REDACTED] informed me, hey, he needs to make a  
 25 phone call, I don't know if, like, you know,

1 he came back. That day, a specific time, I  
 2 can't remember. But I know it was around 8:00  
 3 ish, you know, 8:00, 9:00 ish.  
 4 MR. [REDACTED]: That's fine.  
 5 MR. [REDACTED]: Because the legal visits  
 6 usually end about 8:00. But, you know, there  
 7 was other things going on. You know that?  
 8 MR. [REDACTED]: Who brought him back?  
 9 MR. [REDACTED]: [REDACTED] handed him off to me.  
 10 MR. [REDACTED]: So --  
 11 MR. [REDACTED]: If I remember correctly.  
 12 MR. [REDACTED]: -- so, he brought him back  
 13 from attorney visiting?  
 14 MR. [REDACTED]: Yes.  
 15 MR. [REDACTED]: Okay.  
 16 MR. [REDACTED]: So, he handed him off to me,  
 17 and told me he needed a phone call or whatever.  
 18 So, I had to put Epstein, you know - where'd I  
 19 put him? - I had to put him in the shower  
 20 because I couldn't put him in the room, with  
 21 the phone, by himself, and I'm pulling out  
 22 other inmates at the time, because one of them  
 23 had a noose tied around his neck. He was  
 24 probably playing it, but you can't joke like  
 25 that.

1 MR. [REDACTED]: Which inmate? Do you recall?  
 2 MR. [REDACTED]: I don't remember his name at  
 3 the moment.  
 4 MR. [REDACTED]: Okay. And so, you put him in  
 5 the shower, you said?  
 6 MR. [REDACTED]: Yeah.  
 7 MR. [REDACTED]: And what did [REDACTED] instruct  
 8 you?  
 9 MR. [REDACTED]: And what - oh, just to give  
 10 him a social call, and that's it.  
 11 MR. [REDACTED]: So, it was a social call, he  
 12 mentioned?  
 13 MR. [REDACTED]: Mm-hmm.  
 14 MR. [REDACTED]: Not a legal call?  
 15 MR. [REDACTED]: I believe it was a social  
 16 call.  
 17 MR. [REDACTED]: And do you recall, who  
 18 plugged the phone in? Was it you or [REDACTED]?  
 19 MR. [REDACTED]: I don't remember who plugged  
 20 the phone in.  
 21 MR. [REDACTED]: Okay. And do you remember  
 22 who he said that Epstein wanted to talk to?  
 23 MR. [REDACTED]: No. He never told me who  
 24 Epstein wanted to talk to.  
 25 MR. [REDACTED]: Was any of the instructions,

1 like, did [REDACTED] walk with you to the -? Did  
 2 he come into the shower area with you?  
 3 MR. [REDACTED]: No.  
 4 MR. [REDACTED]: Well, who provided him  
 5 the call? Did [REDACTED] give him the phone, or  
 6 did you give him the phone?  
 7 MR. [REDACTED]: I think [REDACTED] gave him the  
 8 phone.  
 9 MR. [REDACTED]: All right.  
 10 MR. [REDACTED]: Because I didn't hand him the  
 11 phone.  
 12 MR. [REDACTED]: Okay.  
 13 MR. [REDACTED]: I mean, [REDACTED] told me what  
 14 he, you know, what he needed or whatever.  
 15 Okay. No problem. Took him over there to the  
 16 shower, put him in there, and then, I can't  
 17 remember who plugged in the phone, to give him  
 18 the phone call. I don't remember right now.  
 19 MR. [REDACTED]: Because did you --  
 20 MR. [REDACTED]: You might add --  
 21 MR. [REDACTED]: -- ever finish that  
 22 sentence? So, finish the sentence --  
 23 MR. [REDACTED]: Yeah.  
 24 MR. [REDACTED]: -- before asking the  
 25 questions.

1 MR. [REDACTED]: Like --  
 2 MR. [REDACTED]: Okay.  
 3 MR. [REDACTED]: Because it was two years  
 4 ago. He's got to --. And doesn't it say in  
 5 there --  
 6 MR. [REDACTED]: Yeah. It'll go.  
 7 MR. [REDACTED]: -- that --  
 8 MR. [REDACTED]: "[REDACTED] informed that he made  
 9 the decision to have Epstein call from G-tier  
 10 shower to make the call, and believes --."  
 11 MR. [REDACTED]: That, I did. Because I told  
 12 him, put him over here. Because we couldn't  
 13 put him next to these other inmates. That,  
 14 yeah.  
 15 MR. [REDACTED]: Okay. Because those are the  
 16 inmates that was threatening suicide?  
 17 MR. [REDACTED]: Yeah.  
 18 MR. [REDACTED]: Okay.  
 19 MR. [REDACTED]: They were, and they were on  
 20 his tier.  
 21 MR. [REDACTED]: Okay.  
 22 MR. [REDACTED]: So, on L-tier?  
 23 MR. [REDACTED]: Yeah.  
 24 MR. [REDACTED]: Was, people were  
 25 threatening suicide?

1 MR. [REDACTED]: Yeah.  
 2 MR. [REDACTED]: Okay.  
 3 MR. [REDACTED]: I'm going to read that.  
 4 "[REDACTED] informed that he made the decision to  
 5 have Epstein call from the G-tier shower to  
 6 make the call, and believes guards [REDACTED] and  
 7 [REDACTED] were present, as well. [REDACTED] informed  
 8 that [REDACTED] dialed the number for Epstein."  
 9 MR. [REDACTED]: There we go. Yeah, because  
 10 this was a long time ago.  
 11 MR. [REDACTED]: "[REDACTED] further informed that  
 12 he did not overhear the conversation, and that  
 13 [REDACTED] was present for the call initially.  
 14 And then, left before the call ended. [REDACTED]  
 15 says that during the Epstein call, another  
 16 inmate, [REDACTED] was claiming to want to come  
 17 in from suicide, so that diverted some guards  
 18 from Epstein." And do you know how long  
 19 Epstein's call lasted?  
 20 MR. [REDACTED]: I'm not sure how long that  
 21 call lasted. I'm sure we could look on the  
 22 computer and get it.  
 23 MR. [REDACTED]: Do you know if [REDACTED]  
 24 plugged that line into the legal line, or the -  
 25 ?

1 MR. [REDACTED]: I don't.  
 2 MR. [REDACTED]: You don't know if it was a  
 3 recorded phone call?  
 4 MR. [REDACTED]: I don't.  
 5 MR. [REDACTED]: Okay. And was that normal?  
 6 Does [REDACTED] normally do that? Allow calls on  
 7 the legal line, or -?  
 8 MR. [REDACTED]: Not without permission, to my  
 9 knowledge.  
 10 MR. [REDACTED]: Who would have to give  
 11 permission?  
 12 MR. [REDACTED]: Like, I've heard times that,  
 13 you know, a judge may call, like, this person  
 14 needs a legal call. And when that happens or  
 15 whatever, like, all right, we got to get these  
 16 people a legal call. And so, that does happen,  
 17 but I've never known him to do that on his own  
 18 accord.  
 19 MR. [REDACTED]: Okay. Our understanding is,  
 20 based on the investigation, I think Epstein  
 21 stated that he wanted to call his mother. So,  
 22 you think that would have been on the - that  
 23 should have been on the - ?  
 24 MR. [REDACTED]: That should have been on the  
 25 recorded line.

1 people that were in there, that stated that  
 2 [REDACTED] basically gave him a call, and left.  
 3 MR. [REDACTED]: Okay.  
 4 MR. [REDACTED]: And then, later, called  
 5 back and said, hey, his phone call is up, go  
 6 get the phone from him.  
 7 MR. [REDACTED]: Mm-hmm.  
 8 MR. [REDACTED]: Does that sound right?  
 9 MR. [REDACTED]: That sounds about right or  
 10 whatever. I don't think I took that call. But  
 11 I do remember when --  
 12 MR. [REDACTED]: Yeah. I don't think you  
 13 did, either.  
 14 MR. [REDACTED]: -- yeah, but I know when  
 15 everything was all said and done, then dealing  
 16 with the other inmates, you know, I can't  
 17 remember who took the phone out. I do remember  
 18 helping somebody bring Epstein back to his  
 19 cell, and put him in the cell, because I think  
 20 I was the one that put him in the cell.  
 21 MR. [REDACTED]: You put him back into his  
 22 cell?  
 23 MR. [REDACTED]: In his cell.  
 24 MR. [REDACTED]: Okay. You know, from the  
 25 shower, you brought Epstein back from G-tier

1 MR. [REDACTED]: That should have been. Okay.  
 2 And it should not have been on the legal line?  
 3 MR. [REDACTED]: No.  
 4 MR. [REDACTED]: And do you recall if [REDACTED]  
 5 stayed with him for a little bit? Did he listen  
 6 to the conversation? Did anybody listen to the  
 7 conversation?  
 8 MR. [REDACTED]: I don't think so. Well,  
 9 that's --  
 10 MR. [REDACTED]: Well, it says in here  
 11 that - so, just read the --  
 12 MR. [REDACTED]: Yeah.  
 13 MR. [REDACTED]: -- yeah.  
 14 MR. [REDACTED]: Because I know [REDACTED] was up  
 15 there for a while.  
 16 MR. [REDACTED]: Do you know how long  
 17 [REDACTED] was there? Was he there for the  
 18 majority of the conversation, or just a  
 19 portion?  
 20 MR. [REDACTED]: Oh, maybe a portion, but I was  
 21 busy at the time, so I couldn't --  
 22 MR. [REDACTED]: Sure.  
 23 MR. [REDACTED]: -- wasn't looking at him the  
 24 whole time.  
 25 MR. [REDACTED]: Because we have other

1 over to L-tier.  
 2 MR. [REDACTED]: To his cell.  
 3 MR. [REDACTED]: Or into his cell. Okay.  
 4 MR. [REDACTED]: So, when you went to get  
 5 Epstein out of the cell, was the phone still in  
 6 there with him?  
 7 MR. [REDACTED]: I don't remember.  
 8 MR. [REDACTED]: Okay. And do you know how  
 9 long after he started the phone call, you  
 10 brought him back to the cell?  
 11 MR. [REDACTED]: With everything going on --  
 12 MR. [REDACTED]: Just read it.  
 13 MR. [REDACTED]: -- I mean --  
 14 MR. [REDACTED]: I think it says it in  
 15 there. So, you could keep on reading, and  
 16 then, it'll probably get to that.  
 17 MR. [REDACTED]: "After all the guards dealt  
 18 with inmate [REDACTED], Epstein needed to be  
 19 placed back in the cell. [REDACTED] recalls no  
 20 other guard getting up to move Epstein, so he  
 21 made the move at approximately 9:30 p.m."  
 22 MR. [REDACTED]: Mm-hmm.  
 23 MR. [REDACTED]: "[REDACTED] recalls guard [REDACTED]  
 24 filing out the 30-minute round paperwork, while  
 25 he did some of the administrative computer

1 stuff. [REDACTED] informed that -."

2 MR. [REDACTED]: Before we get onto that,

3 though --

4 MR. [REDACTED]: Yeah.

5 MR. [REDACTED]: -- does that sound right?

6 9:30 p.m.? Was that when --

7 MR. [REDACTED]: Mm-hmm.

8 MR. [REDACTED]: -- so, he basically was

9 put in there - what does it sound like? -

10 around 8:00, and then, about --

11 MR. [REDACTED]: Mm-hmm.

12 MR. [REDACTED]: -- 9:30, you moved him

13 back?

14 MR. [REDACTED]: Yeah. Because I, like, he had

15 to stay in there a little longer than probably

16 we wanted, because so much stuff was going on

17 that day.

18 MR. [REDACTED]: Right.

19 MR. [REDACTED]: Do you -. Go ahead.

20 MR. [REDACTED]: So, being that he was in

21 there for probably an hour, maybe an hour and a

22 half, the majority of that time wasn't spent on

23 the phone. Correct?

24 MR. [REDACTED]: No.

25 MR. [REDACTED]: Can you estimate, like,

1 coming up to SHU to work overtime, who doesn't

2 work up there all the time, they don't know

3 that the inmate pulled a fast one, and moved

4 the thing that says legal down to social, and

5 vice versa.

6 MR. [REDACTED]: Oh, well, the information

7 we have is actually, it was an intentional

8 legal line. So, not that, like, an orderly

9 actually misplaced it, but it was intentionally

10 --

11 MR. [REDACTED]: No, no, no. Not the orderly

12 putting the line in or whatever. What I'm

13 saying is the stickers on the jacks on the

14 wall.

15 MR. [REDACTED]: Yeah, no, our information

16 is that [REDACTED] actually was instructed, or

17 provided, was provided approval to give a legal

18 call.

19 MR. [REDACTED]: Oh, okay.

20 MR. [REDACTED]: And do a legal line. But

21 the instructions were also, that we understand,

22 that [REDACTED] was supposed to monitor the entire

23 call.

24 MR. [REDACTED]: Hmm.

25 MR. [REDACTED]: And that's where we're

1 around -?

2 MR. [REDACTED]: Because if his phone calls

3 ended after 15-minutes, if [REDACTED] did call

4 back or whatever, and that phone call - that

5 phone is supposed to die, it's supposed to go

6 off anyway after a certain timeframe.

7 MR. [REDACTED]: Even on a legal line?

8 MR. [REDACTED]: Not on a legal line.

9 MR. [REDACTED]: Right. So, the

10 information we have is, it was actually a legal

11 line call.

12 MR. [REDACTED]: Okay.

13 MR. [REDACTED]: And that's what we're a

14 little confused about, why he was given a

15 personal call on a legal line. But do you know

16 anything about that?

17 MR. [REDACTED]: I know up there in that SHU,

18 that if - and it's very difficult, especially

19 when you're short-staffed - you know, you have

20 orderlies that walk around and, you know, try

21 to help keep the place clean. If you're short

22 staffed, and you can't be everywhere, and you

23 have an orderly cleaning the tier, they will

24 take those little things, and flip the, you

25 know? Like, so, if you have somebody that's

1 trying to get, like, all right, well, how long

2 was that call, and how long did he monitor? Do

3 you know?

4 MR. [REDACTED]: Gotcha.

5 MR. [REDACTED]: And do you know that?

6 MR. [REDACTED]: That, I don't know. Because I

7 -.

8 MR. [REDACTED]: So, if it lasted 15

9 minutes, do you think he was there for, like,

10 five minutes? The fact that he had to go back

11 somewhere, and then call, and say, hey, his

12 call is up, get that --

13 MR. [REDACTED]: Yeah.

14 MR. [REDACTED]: -- phone from him. Do

15 you remember -? Just because you put in there

16 that he did stay for the call. Can you --

17 MR. [REDACTED]: Yes, I'm --

18 MR. [REDACTED]: -- in your recollection

19 at all, can you think about, about how long he

20 was even there?

21 MR. [REDACTED]: Probably somewhere between

22 five to ten minutes, but, like --

23 MR. [REDACTED]: Okay.

24 MR. [REDACTED]: -- I mean, like, all that time

25 passed now, and I was running around, and --

1 MR. [REDACTED]: Sure. But just, you know  
 2 he wasn't there for the whole entire thing?  
 3 MR. [REDACTED]: Right.  
 4 MR. [REDACTED]: Okay. Sure.  
 5 MR. [REDACTED]: Mm-hmm.  
 6 MR. [REDACTED]: And just to clarify, you  
 7 don't recall if [REDACTED] gave instructions to  
 8 you, or if you overheard him give instructions  
 9 to [REDACTED] or [REDACTED] about --  
 10 MR. [REDACTED]: No.  
 11 MR. [REDACTED]: -- monitoring the call?  
 12 MR. [REDACTED]: No.  
 13 MR. [REDACTED]: Okay.  
 14 MR. [REDACTED]: Like, because usually, on a  
 15 social call, you don't really have to monitor,  
 16 because you could just go on the computer, and  
 17 listen to the phone call. You know, on legal  
 18 calls, you know, they have attorney/client  
 19 privilege, so you can't listen anyway. So, any  
 20 time I know it may be a legal call going on,  
 21 and I know I can't listen in, it's because they  
 22 - well, this is now - but they put inmates in a  
 23 little visit room for their legal calls, so  
 24 they could do the teleconference because of  
 25 COVID.

1 MR. [REDACTED]: No.  
 2 MR. [REDACTED]: Because I'm going to jump  
 3 off. Okay. "[REDACTED] recalls guard [REDACTED] filling  
 4 out the 30-minute round paperwork while he did  
 5 some administrative computer stuff."  
 6 MR. [REDACTED]: Mm-hmm.  
 7 MR. [REDACTED]: Do you know if she pre-filled  
 8 the 30-minute round paperwork?  
 9 MR. [REDACTED]: I do not.  
 10 MR. [REDACTED]: Okay.  
 11 MR. [REDACTED]: Is this the paperwork?  
 12 What's this?  
 13 MR. [REDACTED]: Yeah.  
 14 MR. [REDACTED]: That's the 30-minute round  
 15 sheet. Yeah.  
 16 MR. [REDACTED]: So, it's on August 9th,  
 17 2019?  
 18 MR. [REDACTED]: Is that for the SHU?  
 19 MR. [REDACTED]: Mm-hmm. Nope. This is L-  
 20 tier.  
 21 MR. [REDACTED]: This would be during evening  
 22 watch?  
 23 MR. [REDACTED]: This is morning watch.  
 24 MR. [REDACTED]: Mm-hmm.  
 25 MR. [REDACTED]: Day watch. Evening watch.

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: But I can't even - you know -  
 3 I can't sit there and listen to him make his  
 4 legal call.  
 5 MR. [REDACTED]: Sure.  
 6 MR. [REDACTED]: So, I, you know -?  
 7 MR. [REDACTED]: So, either way, you  
 8 didn't think you had to listen, because if it  
 9 was a legal line, you can't listen; if it was  
 10 social line, it was supposed to be recorded?  
 11 MR. [REDACTED]: Right.  
 12 MR. [REDACTED]: All right. And then, do  
 13 you -?  
 14 MR. [REDACTED]: And if we had more time, if I  
 15 knew, you know --  
 16 MR. [REDACTED]: Yeah, yeah, yeah.  
 17 MR. [REDACTED]: -- what to do.  
 18 MR. [REDACTED]: Absolutely. But do you  
 19 remember, did he instruct you to monitor the  
 20 call after he left?  
 21 MR. [REDACTED]: No.  
 22 MR. [REDACTED]: No.  
 23 MR. [REDACTED]: No.  
 24 MR. [REDACTED]: Okay. Okay.  
 25 MR. [REDACTED]: Any other questions on that?

1 MR. [REDACTED]: Okay. And you were working  
 2 during evening watch, right?  
 3 MR. [REDACTED]: From 2:00 to 10:00.  
 4 MR. [REDACTED]: So, who was doing the round  
 5 sheets?  
 6 MR. [REDACTED]: So, this is [REDACTED] right here.  
 7 MR. [REDACTED]: Who's on the other one?  
 8 MR. [REDACTED]: This one?  
 9 MR. [REDACTED]: Yeah.  
 10 MR. [REDACTED]: I have no idea whose signature  
 11 this is. This is day shift. Yeah. I don't  
 12 know whose signature this is right here.  
 13 MR. [REDACTED]: [REDACTED] Is it -.  
 14 MR. [REDACTED]: Actually, hmm -.  
 15 MR. [REDACTED]: Like, [REDACTED]  
 16 MR. [REDACTED]: It actually might be. Yeah.  
 17 That looks like an "[REDACTED]" Yeah.  
 18 MR. [REDACTED]: You're not sure, but  
 19 maybe [REDACTED] though?  
 20 MR. [REDACTED]: Yeah. Maybe.  
 21 MR. [REDACTED]: Because it stops, it  
 22 looks like, at about 2:00 p.m., and wasn't  
 23 [REDACTED] done by, like, around 2:00 p.m.?  
 24 MR. [REDACTED]: That's exactly right, because  
 25 that's when I came in. So, I relieved [REDACTED]

1 that day. So, he stopped right here.  
 2 MR. [REDACTED]: And is that why they  
 3 stopped there, because he left?  
 4 MR. [REDACTED]: He --  
 5 MR. [REDACTED]: So, it looks like they  
 6 weren't --  
 7 MR. [REDACTED]: -- yeah, so, I guess the  
 8 --  
 9 MR. [REDACTED]: -- filled in for the rest  
 10 of the --  
 11 MR. [REDACTED]: -- right, because the --  
 12 MR. [REDACTED]: -- time.  
 13 MR. [REDACTED]: -- date, when I relieved him,  
 14 I guess he must have been the one controlling  
 15 this paper. So, I relieved him. And the crew  
 16 here didn't continue it. I just came in. So,  
 17 I probably didn't know at the time or whatever.  
 18 But I think we probably did say later, like,  
 19 what the hell is this?  
 20 MR. [REDACTED]: Okay. So, it's probably  
 21 [REDACTED]. And then, as you noticed, the other  
 22 -. Do you know why the other round counts  
 23 wouldn't be filled - the round - ?  
 24 MR. [REDACTED]: These?  
 25 MR. [REDACTED]: Yeah.

1 yet.  
 2 MR. [REDACTED]: All right.  
 3 MR. [REDACTED]: She wasn't at work yet.  
 4 MR. [REDACTED]: Gotcha. So, what -. So,  
 5 we have information, the investigation has  
 6 informed us that she actually pre-populated the  
 7 round sheets that she filled out. Do you know  
 8 anything about her? When you say that she  
 9 filled out these things, did she fill them all  
 10 out in front of you? Did you see that?  
 11 MR. [REDACTED]: Huh-uh. I didn't see her do  
 12 that.  
 13 MR. [REDACTED]: You didn't see her pre-  
 14 populate it? Okay. Go ahead.  
 15 MR. [REDACTED]: "[REDACTED] informed that, before  
 16 he left -."  
 17 MR. [REDACTED]: I'm sorry. Sorry. I  
 18 should follow up. What did you see her do?  
 19 Since you said that you saw her filling out the  
 20 round sheets.  
 21 MR. [REDACTED]: Yeah. So --  
 22 MR. [REDACTED]: What did you see?  
 23 MR. [REDACTED]: -- yeah, I just saw the round  
 24 sheet sitting there, and she was doing it. So,  
 25 I'm assuming that she's just doing it for,

1 MR. [REDACTED]: Yeah.  
 2 MR. [REDACTED]: Why they wouldn't be  
 3 filled in?  
 4 MR. [REDACTED]: For the day watch. The end  
 5 of day watch, and that would be from --  
 6 MR. [REDACTED]: From 2:00 to 4:00.  
 7 MR. [REDACTED]: -- 2:00 p.m. -. Yeah.  
 8 MR. [REDACTED]: Or 2:30, in this case. From  
 9 2:30 to 4:00. I'm going to assume that they  
 10 were forgetting because, like, from what I'm  
 11 looking at here - and this is just an  
 12 assumption - from what I'm looking at here,  
 13 from the time [REDACTED] got into work, he was  
 14 the one filling out this paper. Nobody else  
 15 probably thought about it.  
 16 MR. [REDACTED]: Okay. So, when you  
 17 mentioned that [REDACTED] was filling out the 30-  
 18 minute round sheets, you're talking about over  
 19 here?  
 20 MR. [REDACTED]: Yeah.  
 21 MR. [REDACTED]: Okay. So, she was  
 22 filling out the --  
 23 MR. [REDACTED]: Yeah --  
 24 MR. [REDACTED]: -- the day watch.  
 25 MR. [REDACTED]: -- because she wasn't here

1 okay, cool, we just did that round. And I'm on  
 2 the computer, doing the other admin work.  
 3 MR. [REDACTED]: Okay. So, you just --  
 4 MR. [REDACTED]: Because -.  
 5 MR. [REDACTED]: -- saw her doing  
 6 something, but you weren't really watching over  
 7 her?  
 8 MR. [REDACTED]: Yeah. Because the thing is,  
 9 because remember when you asked me about the  
 10 SHU one position, and I'm SHU three? This is  
 11 the tricky part. [REDACTED] may be on paper as  
 12 SHU one, but he's on overtime. I worked up  
 13 there every day. I'm the only one who has  
 14 access to do the stuff on the computer.  
 15 MR. [REDACTED]: Okay.  
 16 MR. [REDACTED]: So -.  
 17 MR. [REDACTED]: And what type of stuff  
 18 were you doing on the computer?  
 19 MR. [REDACTED]: So, the computer, you do 583s.  
 20 You do the - there's another SHU log-in there -  
 21 you do the -.  
 22 MR. [REDACTED]: When you say 583, that's  
 23 an incident report, right?  
 24 MR. [REDACTED]: Yeah. The incident reports.  
 25 You do the daily, like, inmates took showers,

1 and then, the OIC thing has to have a  
 2 signature, but because nobody else has the  
 3 access to it, that portion will fall on me  
 4 because the paperwork still has to get done  
 5 anyway.  
 6 MR. [REDACTED]: Right. So, you were the  
 7 one on your shift that had access to the actual  
 8 computer systems --  
 9 MR. [REDACTED]: Right.  
 10 MR. [REDACTED]: -- and the databases.  
 11 MR. [REDACTED]: Mm-hmm.  
 12 MR. [REDACTED]: Okay.  
 13 MR. [REDACTED]: Yeah, because they don't. So,  
 14 I'm, like --  
 15 MR. [REDACTED]: Sure.  
 16 MR. [REDACTED]: -- handle this paperwork. The  
 17 physical paperwork. I'll take care of the  
 18 computerized.  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: "[REDACTED] informed that, before  
 21 he left, he conducted a round and spoke to  
 22 Epstein, and asked, 'Are you good?', to which  
 23 Epstein gave a thumbs up response."  
 24 MR. [REDACTED]: Yes.  
 25 MR. [REDACTED]: When you say conducted a

1 The wording on this is wrong. Do you recall  
 2 stating that to [REDACTED] and [REDACTED]? "Make sure  
 3 you watch him?"  
 4 MR. [REDACTED]: Yes, I did.  
 5 MR. [REDACTED]: "He's your priority."  
 6 MR. [REDACTED]: Yeah, I did.  
 7 MR. [REDACTED]: Why would you state something  
 8 like that?  
 9 MR. [REDACTED]: I just didn't like the way he  
 10 was looking. I can't determine what this man  
 11 was thinking, but -. And he normally, you  
 12 know, saying, you ask him a question, if it's a  
 13 yes or a no question, he would normally just  
 14 give you a thumbs up or whatever, and stuff,  
 15 like, pretty much just not want to be bothered  
 16 with you, for the most part.  
 17 MR. [REDACTED]: Well, it was -. Wasn't  
 18 it not true that he was kind of the priority  
 19 for the whole SHU? Was this sign up in the SHU,  
 20 saying that, "Mandatory rounds must be  
 21 conducted every 30 minutes on Epstein, as per  
 22 God."  
 23 MR. [REDACTED]: Yeah. That was in the SHU.  
 24 MR. [REDACTED]: So, do you remember  
 25 seeing that?

1 round, did you conduct a round through all the  
 2 tiers, or just around up to Epstein, just to  
 3 check on him?  
 4 MR. [REDACTED]: I specifically went to  
 5 Epstein.  
 6 MR. [REDACTED]: Okay.  
 7 MR. [REDACTED]: I specifically went to that  
 8 dude.  
 9 MR. [REDACTED]: And you checked on him?  
 10 MR. [REDACTED]: And I checked. I looked at  
 11 him. Yo, you good? He gave me a thumbs up or  
 12 whatever. All right.  
 13 MR. [REDACTED]: So, what do you mean?  
 14 Yeah. So, that, I think what his clarification  
 15 is, you did a round on Epstein. You didn't do  
 16 a round throughout the SHU. Correct?  
 17 MR. [REDACTED]: No. Not throughout the SHU.  
 18 I have specifically checked on him.  
 19 MR. [REDACTED]: Oh, gotcha. Okay.  
 20 MR. [REDACTED]: "[REDACTED] said that, before he  
 21 left, he went back to guards [REDACTED] and [REDACTED],  
 22 and -", oh, this -. "[REDACTED] said that, before  
 23 he left, he went back to guards [REDACTED] and  
 24 [REDACTED], and 'Make sure you watch him.'  
 25 Referring to Epstein, "He's your priority."

1 MR. [REDACTED]: I do remember seeing that.  
 2 Where it was actually posted or whatever, I  
 3 don't know.  
 4 MR. [REDACTED]: I think it was on one of  
 5 the computers.  
 6 MR. [REDACTED]: Yeah. I do remember seeing  
 7 that. Yeah.  
 8 MR. [REDACTED]: So, I'm assuming that's  
 9 also part of the reason why you checked on  
 10 Epstein. Correct?  
 11 MR. [REDACTED]: Mm-hmm.  
 12 MR. [REDACTED]: Because he was the SHU  
 13 priority?  
 14 MR. [REDACTED]: Yeah.  
 15 MR. [REDACTED]: Yeah. And then, you were  
 16 just reinforcing two of the people when you  
 17 left, "Make sure you got him?"  
 18 MR. [REDACTED]: Mm-hmm.  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: And then, I looked at the guy,  
 21 and then, you, you know, he just had a look on  
 22 his face. I'm, like, and then, that -. And  
 23 I'm, like, yeah. I stopped.  
 24 MR. [REDACTED]: So, you actually thought  
 25 something might be up?

1 MR. [REDACTED]: Yeah. Because I'm looking at  
 2 him, he gave me the thumbs up or whatever.  
 3 I'm, like, he just looked different. I can't  
 4 explain it. But he just looked different. You  
 5 know, he didn't look like himself. He's an  
 6 entitled --  
 7 MR. [REDACTED]: Yeah, yeah.  
 8 MR. [REDACTED]: -- you know, rich guy or  
 9 whatever. You know? Just very nonchalantly or  
 10 whatever, I'm, like, you don't usually do it  
 11 that way.  
 12 MR. [REDACTED]: Okay. So, you --  
 13 MR. [REDACTED]: But that's my personal  
 14 opinion.  
 15 MR. [REDACTED]: Yeah.  
 16 MR. [REDACTED]: That's not a fact.  
 17 MR. [REDACTED]: Did you mention that at  
 18 all to --?  
 19 MR. [REDACTED]: I didn't tell them that part.  
 20 I just said, "Watch this guy."  
 21 MR. [REDACTED]: All right. So, you  
 22 didn't say why to watch him --  
 23 MR. [REDACTED]: Hmm-mm.  
 24 MR. [REDACTED]: -- you just said, "Make  
 25 sure you watch him"?

1 MR. [REDACTED]: So --.  
 2 MR. [REDACTED]: And that would have been  
 3 right around 10:00 p.m.  
 4 MR. [REDACTED]: Yeah. Right before I left, I  
 5 was, like, yeah, keep an eye on that dude.  
 6 MR. [REDACTED]: Okay.  
 7 MR. [REDACTED]: And right out the door.  
 8 MR. [REDACTED]: Okay.  
 9 MR. [REDACTED]: Did they respond to you? Did  
 10 they say okay?  
 11 MR. [REDACTED]: I don't even remember if they  
 12 did. I know they heard me because I was  
 13 standing right in front of them, but I don't  
 14 even remember if they responded or not.  
 15 MR. [REDACTED]: And then, when he gave you a  
 16 thumbs up, did he say anything else to you?  
 17 MR. [REDACTED]: Hmm-mm.  
 18 MR. [REDACTED]: There was no verbal  
 19 conversation?  
 20 MR. [REDACTED]: No.  
 21 MR. [REDACTED]: Okay.  
 22 MR. [REDACTED]: He very rarely talked unless  
 23 he wanted something. Yeah.  
 24 MR. [REDACTED]: Okay. And just because I'm  
 25 showing you these documents, can you initial

1 MR. [REDACTED]: Yeah. I didn't give them no  
 2 details. I just said, "Watch this guy."  
 3 MR. [REDACTED]: Did you have a feeling  
 4 that he might hurt himself or anything like  
 5 that?  
 6 MR. [REDACTED]: I didn't know, but I just felt  
 7 that it was the best thing to just keep an eye  
 8 on this dude.  
 9 MR. [REDACTED]: Okay.  
 10 MR. [REDACTED]: Mm-hmm.  
 11 MR. [REDACTED]: Something - your spidey  
 12 senses went up and said - something --  
 13 MR. [REDACTED]: Mm-hmm.  
 14 MR. [REDACTED]: -- something is amiss  
 15 here, or make sure you're watching him.  
 16 MR. [REDACTED]: Yeah.  
 17 MR. [REDACTED]: And your positive you  
 18 told them that?  
 19 MR. [REDACTED]: Yeah.  
 20 MR. [REDACTED]: Okay. And to both of  
 21 them? Or you just said it both at the same  
 22 time, or individually?  
 23 MR. [REDACTED]: I said it both at the same  
 24 time.  
 25 MR. [REDACTED]: All right.

1 and date the top of them? It's not to test  
 2 what's on the documents, it's more to --  
 3 MR. [REDACTED]: To show you that --  
 4 MR. [REDACTED]: -- for our records, that --.  
 5 MR. [REDACTED]: -- I saw it.  
 6 MR. [REDACTED]: You saw it. These are  
 7 documents we showed you.  
 8 MR. [REDACTED]: And you want me to sign and  
 9 date?  
 10 MR. [REDACTED]: Initial and date. Today is  
 11 8/5/2021.  
 12 MR. [REDACTED]: And you said it was 8/5 --?  
 13 MR. [REDACTED]: '21. The same thing for the  
 14 other ones, too. Excuse me. This one, too?  
 15 MR. [REDACTED]: Yes, please. This, we'll  
 16 keep, just in case we go back and refer to it.  
 17 So, I'm going to read that line back, and  
 18 finish off the paragraph. "[REDACTED] said that,  
 19 before he left, he went back to guards [REDACTED] and  
 20 [REDACTED], and, 'Make sure you watch him,'  
 21 referring --."  
 22 MR. [REDACTED]: And stated.  
 23 MR. [REDACTED]: Yeah.  
 24 MR. [REDACTED]: Make sure you have that  
 25 word.

1 MR. [REDACTED]: "And stated," just make sure  
2 I put that, "And stated, 'Make sure you watch  
3 him,' referring to Epstein, 'He's your  
4 priority.'"

5 MR. [REDACTED]: Mm-hmm.

6 MR. [REDACTED]: "[REDACTED] stated that Epstein  
7 seemed normal and he was just sitting there."

8 MR. [REDACTED]: And that's correct.  
9 Right?

10 MR. [REDACTED]: Mm-hmm. Yeah because, like,  
11 it's an opinion of mine. I can't tell you --

12 MR. [REDACTED]: Sure.

13 MR. [REDACTED]: -- what I'm thinking.

14 MR. [REDACTED]: Absolutely. We just want  
15 to make sure that the report is accurate.

16 MR. [REDACTED]: "[REDACTED] explained the 30-  
17 minute rounds, and when asked about the  
18 paperwork, stated that the exact times are  
19 probably off because they are estimates." What  
20 do you mean by "Estimates"?

21 MR. [REDACTED]: Because, at that point in  
22 time, it was only three of us in there. You  
23 know, so, [REDACTED] is working overtime. So,  
24 he's doing multiple things. He's doing his  
25 regular job, and SHU stuff at the same time.

1 MR. [REDACTED]: So, you're saying that they  
2 went in and they did the rounds?

3 MR. [REDACTED]: Yeah. I've seen it. Because  
4 as I'm doing my paperwork and talking to  
5 inmates and stuff like that, they were moving  
6 the whole time. I, you know, like, if I  
7 remember correctly, I barely saw them sit down.

8 MR. [REDACTED]: So, you saw them moving. Did  
9 you actually see them do the rounds, or you  
10 just saw them move?

11 MR. [REDACTED]: I saw them going in and out of  
12 tiers or whatever, because [REDACTED] -. I know  
13 [REDACTED] had a blue bin, at one point in time,  
14 he was going from tier to tier, doing  
15 something. And I think [REDACTED] had the key. You  
16 know, but it was a lot of movement that day.  
17 So, I guess that's the best way to put it.

18 MR. [REDACTED]: So, you saw movement, but you  
19 don't -. You didn't actually see  
20 (Indiscernible \*00:34:18)?

21 MR. [REDACTED]: They had to go down the range,  
22 but I didn't, like -. Every single time, at  
23 every 30-minute mark --

24 MR. [REDACTED]: Yeah.

25 MR. [REDACTED]: -- I don't know.

1 So, and then, you got dudes over here acting  
2 like they want to commit suicide. So now, as  
3 you're doing rounds, and everything is going  
4 on, you talk to one inmate, now this inmate has  
5 a problem. You may forget sometimes to go up  
6 there and just write it, you know, write it in  
7 or whatever. So, sometimes they might be,  
8 like, shit, fuck, I forgot. And then, they'll  
9 go back or whatever. I'm not saying, but  
10 that's just, you know, normal or whatever,  
11 like, oh, man, I forgot. And you just go write  
12 in it. That's just normal, how they do it.  
13 That's why I hate these papers. I rather just  
14 do it on the computer because you can't miss.

15 MR. [REDACTED]: You have questions on that?

16 MR. [REDACTED]: But there's still some  
17 more, right?

18 MR. [REDACTED]: Yeah. "When told that there  
19 is a video of the SHU area, [REDACTED] stated that  
20 he would be surprised to see video of the  
21 rounds not being conducted."

22 MR. [REDACTED]: Mm-hmm.

23 MR. [REDACTED]: When asked about -.

24 MR. [REDACTED]: Because they were on their  
25 feet all day.

1 MR. [REDACTED]: Okay.

2 MR. [REDACTED]: Just finish the thing,  
3 and then --

4 MR. [REDACTED]: Yeah.

5 MR. [REDACTED]: -- you can ask the  
6 additional questions.

7 MR. [REDACTED]: "When asked about the round  
8 sheets and the sign-off procedures, [REDACTED] could  
9 not clearly remember who did what rounds  
10 exactly, or what, if any, rounds he did. Only  
11 that --

12 MR. [REDACTED]: Mm-hmm.

13 MR. [REDACTED]: -- he would not have signed  
14 off on the rounds had they not been conducted."

15 MR. [REDACTED]: That's true.

16 MR. [REDACTED]: And based on the round  
17 sheets, you're saying that you saw [REDACTED]?

18 MR. [REDACTED]: Mm-hmm.

19 MR. [REDACTED]: Is that [REDACTED] signature on -  
20 -

21 MR. [REDACTED]: That's [REDACTED].

22 MR. [REDACTED]: -- on the evening watch?

23 MR. [REDACTED]: Mm-hmm.

24 MR. [REDACTED]: Is that for all the tiers?  
25 (Indiscernible \*00:34:50).

1 MR. [REDACTED]: This is --  
 2 MR. [REDACTED]: That's for L-tier, right?  
 3 MR. [REDACTED]: -- this is for L-tier. Each  
 4 sheet is for a different tier. And this is J-  
 5 tier. So, J-tier didn't get finished. K-tier  
 6 didn't get finished.  
 7 MR. [REDACTED]: What do you mean, they didn't  
 8 get finished?  
 9 MR. [REDACTED]: There's blank spots.  
 10 MR. [REDACTED]: For what time?  
 11 MR. [REDACTED]: 11:00 and 12:00.  
 12 MR. [REDACTED]: What were they doing?  
 13 MR. [REDACTED]: 11:00 - excuse me - 11:00 and  
 14 through 11:30.  
 15 MR. [REDACTED]: What's your take --  
 16 MR. [REDACTED]: So -.  
 17 MR. [REDACTED]: -- on why they would be  
 18 empty?  
 19 MR. [REDACTED]: Maybe they didn't -. Maybe  
 20 they didn't do it. I don't know. I don't know  
 21 why it would be empty. I'm thinking too much  
 22 now because I'm, like, if this was finished,  
 23 why wasn't -?  
 24 MR. [REDACTED]: What is it? You hesitated.  
 25 MR. [REDACTED]: Yeah.

1 in here.  
 2 MR. [REDACTED]: On August 9th and 10th --  
 3 MR. [REDACTED]: Yeah.  
 4 MR. [REDACTED]: -- do you recall where these  
 5 forms were?  
 6 MR. [REDACTED]: I believe this was by the  
 7 desk.  
 8 MR. [REDACTED]: On the officer's desk?  
 9 MR. [REDACTED]: I believe so.  
 10 MR. [REDACTED]: Where are the forms supposed  
 11 to be kept?  
 12 MR. [REDACTED]: When initially I was trained,  
 13 they were on the desk. As time went on, they  
 14 said they wanted them on the tiers. So, a  
 15 definitive answer on that, the instruction on  
 16 that has changed so much, like, you know, one -  
 17 -  
 18 MR. [REDACTED]: Mm-hmm.  
 19 MR. [REDACTED]: -- one day, they was, like,  
 20 keep them on the ranges, another day you come  
 21 in or whatever, leave it right here so you  
 22 can't miss it, so you don't lose any papers.  
 23 MR. [REDACTED]: Why do they keep it on the  
 24 ranges?  
 25 MR. [REDACTED]: So, on the ranges, when you do

1 MR. [REDACTED]: Explain that.  
 2 MR. [REDACTED]: Like, I don't know. Because  
 3 if you were doing the round here, how did you -  
 4 ? Unless something happened at that time, at  
 5 night, but I wasn't at work at that time.  
 6 Because this is after --  
 7 MR. [REDACTED]: Okay.  
 8 MR. [REDACTED]: -- this is after 10:00.  
 9 MR. [REDACTED]: After 10:00.  
 10 MR. [REDACTED]: So, I wasn't here for this.  
 11 MR. [REDACTED]: So, you're saying there's  
 12 about three tiers where it wasn't finished off,  
 13 right? The K-tier.  
 14 MR. [REDACTED]: Mm-hmm.  
 15 MR. [REDACTED]: That's J-tier.  
 16 MR. [REDACTED]: That's J.  
 17 MR. [REDACTED]: And -.  
 18 MR. [REDACTED]: J-tier. K-tier. H.  
 19 MR. [REDACTED]: H-tier.  
 20 MR. [REDACTED]: And G.  
 21 MR. [REDACTED]: They weren't finished off?  
 22 MR. [REDACTED]: Hmm-mm.  
 23 MR. [REDACTED]: Okay. Do you know where?  
 24 Where were these round sheets kept in the SHU?  
 25 MR. [REDACTED]: There's been so many changes

1 do a round or whatever, you go and do a whole  
 2 round, when you get to the end of the range,  
 3 the paper is right there on the clipboard. So,  
 4 you could sign it, and finish the round, and  
 5 come out.  
 6 MR. [REDACTED]: Just to ensure that they're  
 7 actually --  
 8 MR. [REDACTED]: Right.  
 9 MR. [REDACTED]: -- doing their rounds. Okay.  
 10 And how many people are needed to conduct  
 11 rounds?  
 12 MR. [REDACTED]: Only one person is needed to  
 13 conduct a round.  
 14 MR. [REDACTED]: Not two people?  
 15 MR. [REDACTED]: No. Two people are needed for  
 16 a count.  
 17 MR. [REDACTED]: And -.  
 18 MR. [REDACTED]: Because, you know, like, in  
 19 the -. Unless it's one -.  
 20 MR. [REDACTED]: Was that per policy, or  
 21 is that per practice?  
 22 MR. [REDACTED]: Per practice. When you do a  
 23 round, it's one person that opens the grill,  
 24 and one person goes down. Is that what you  
 25 mean? Because, you know, a count, one person

1 goes down, comes out, and then, the next person  
2 goes down and comes out. But for a round, only  
3 one person.

4 MR. [REDACTED]: So, we were informed by  
5 per policy, at least, counts and rounds are  
6 conducted exactly the same way. The only thing  
7 difference is that, in a count, you count  
8 inmates. Is that not correct?

9 MR. [REDACTED]: Not the way I was taught, but  
10 that's per - I'm going to be honest - that's  
11 per practice.

12 MR. [REDACTED]: And is that even to date,  
13 that's what they do?

14 MR. [REDACTED]: I haven't been in the SHU  
15 since --

16 MR. [REDACTED]: Okay.

17 MR. [REDACTED]: -- so, I don't know what  
18 they're doing up there.

19 MR. [REDACTED]: Oh, you haven't been in  
20 SHU since this date?

21 MR. [REDACTED]: I've been in there after that  
22 date, but I haven't been in the SHU in months.

23 MR. [REDACTED]: Okay. So, when you were,  
24 after that date, though, they never went over,  
25 like, how to conduct a round? And so, yeah,

1 everything that we're saying is that a round  
2 and a count is exactly the same. Two people  
3 are needed. The only difference is, during a  
4 count, you count.

5 MR. [REDACTED]: Hmm. No. I don't --

6 MR. [REDACTED]: You've never heard of  
7 that?

8 MR. [REDACTED]: -- I don't remember - after  
9 that incident - I don't remember having that  
10 discussion with anyone.

11 MR. [REDACTED]: So, your understanding is  
12 only one person --

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

14 MR. [REDACTED]: -- per count --

15 MR. [REDACTED]: -- that's my understanding.

16 MR. [REDACTED]: -- per round. Okay.

17 MR. [REDACTED]: Okay. Any other questions on  
18 the rounds?

19 MR. [REDACTED]: Yeah. So, as far as, do  
20 you know if these rounds that were on this  
21 round sheet, were they all conducted as it's  
22 filled out?

23 MR. [REDACTED]: That, I don't know, because --

24 MR. [REDACTED]: You're not sure?

25 MR. [REDACTED]: -- I'm not sure.

1 MR. [REDACTED]: So, what is your  
2 understanding, if the one person is only  
3 filling out the count, is she filling it out on  
4 behalf of - so, in this case, it was [REDACTED] - is  
5 she filling it out on behalf of everybody in  
6 the SHU, or is she only saying that she  
7 conducted the round?

8 MR. [REDACTED]: I'm going to assume that she  
9 was filling it out for everybody that was  
10 working. Like, so, if she did a round, and  
11 [REDACTED] did a round, she just filled it out,  
12 in that case. I learned my lesson from that,  
13 so I only signed when I did it.

14 MR. [REDACTED]: Yeah, yeah, yeah. For  
15 that point forward, correct?

16 MR. [REDACTED]: Hell no. I knew that, learned  
17 that before it.

18 MR. [REDACTED]: All right.

19 MR. [REDACTED]: So, you only would fill it  
20 out. So, you're not, obviously, on here. But  
21 is she filling it out for both you and  
22 [REDACTED], as well?

23 MR. [REDACTED]: I'm going to assume, maybe.

24 MR. [REDACTED]: Okay.

25 MR. [REDACTED]: But I don't know what her

1 thought process is with this.

2 MR. [REDACTED]: So, how it mentioned  
3 there that, you know, the video would be  
4 reviewed. That video has been reviewed, in  
5 detail.

6 MR. [REDACTED]: Mm-hmm.

7 MR. [REDACTED]: Do you believe that all  
8 these rounds were conducted on that date?

9 MR. [REDACTED]: I believe the vast majority of  
10 them should have been. Now, were all of them?  
11 Because I know for a fact, me personally, I  
12 wasn't the one to do every --

13 MR. [REDACTED]: So, you --

14 MR. [REDACTED]: -- single round.

15 MR. [REDACTED]: -- so, you weren't the  
16 one conducting the round, but you can't say if  
17 the other people were?

18 MR. [REDACTED]: I can't --

19 MR. [REDACTED]: You can only --

20 MR. [REDACTED]: -- I can't say that.

21 MR. [REDACTED]: All right. Do you  
22 believe all those rounds were conducted?

23 MR. [REDACTED]: I believe, I definitely  
24 believe this - what is this? L and M, and I'm  
25 just confused as to the rest.

1 MR. [REDACTED]: Because again --  
 2 MR. [REDACTED]: But --  
 3 MR. [REDACTED]: -- we have -. Like, our  
 4 investigation has showed that that was all pre-  
 5 filled out.  
 6 MR. [REDACTED]: So, yeah. And that -. Wait a  
 7 minute.  
 8 MR. [REDACTED]: And I don't know why she  
 9 would pre-fill out some of them, but not the  
 10 rest.  
 11 MR. [REDACTED]: I see. I see why. Yeah.  
 12 MR. [REDACTED]: Explain.  
 13 MR. [REDACTED]: Yeah. Because of the times.  
 14 01:02, 33:34. 03 to 04. And then, then you  
 15 flip the page, it's the same thing. It's just  
 16 a minute difference. I see why.  
 17 MR. [REDACTED]: So, now that you're  
 18 looking at it, do you believe that those are  
 19 accurate?  
 20 MR. [REDACTED]: This stuff. It's pre-filled.  
 21 MR. [REDACTED]: It's pre-filled? These  
 22 are pre-filled?  
 23 MR. [REDACTED]: That - and yeah - it's a good  
 24 possibility that's pre-filled.  
 25 MR. [REDACTED]: And what do you know

1 MR. [REDACTED]: At the time, usually, I  
 2 stopped messing with this after my first  
 3 incident, and dealing with this round sheet.  
 4 So, if I do a round, I fill it out. If I  
 5 wasn't the one that did it, I don't sign it.  
 6 MR. [REDACTED]: Yeah, yeah. So, what I'm  
 7 talking about, from August, basically 10th,  
 8 from the time he was found, previous to that,  
 9 would you pre-populate round sheets?  
 10 MR. [REDACTED]: No, I didn't pre-populate.  
 11 MR. [REDACTED]: Okay.  
 12 MR. [REDACTED]: Because I learned something  
 13 before that time, to --  
 14 MR. [REDACTED]: Oh, what did you learn  
 15 before?  
 16 MR. [REDACTED]: Because that was a problem,  
 17 with people doing that before, and nobody  
 18 wanting to sign round sheets, for what reason  
 19 or whatever. So, I was, like, okay, if I did  
 20 it, sign it; if I didn't do it, not sign it.  
 21 That's how I learned my lesson. That's why my  
 22 name is not on this.  
 23 MR. [REDACTED]: Okay. So, your name  
 24 wasn't specifically on that round sheet because  
 25 you're, like, I'm not signing it, and getting

1 about -.  
 2 MR. [REDACTED]: I can't say that that's for  
 3 sure what she did.  
 4 MR. [REDACTED]: But by reviewing it --  
 5 MR. [REDACTED]: I could see where --  
 6 MR. [REDACTED]: -- from your knowledge -.  
 7 MR. [REDACTED]: -- I could see where that  
 8 assumption would come from.  
 9 MR. [REDACTED]: But from your knowledge  
 10 and experience, by looking at the way that  
 11 that's filled out, you would say that that's  
 12 pre-filled?  
 13 MR. [REDACTED]: Yes. Uh-huh. It's a  
 14 possibility.  
 15 MR. [REDACTED]: And have you ever pre-  
 16 filled out round sheets?  
 17 MR. [REDACTED]: No.  
 18 MR. [REDACTED]: Do people --  
 19 MR. [REDACTED]: Not to my knowledge.  
 20 MR. [REDACTED]: -- do people in general  
 21 fill out round sheets, and they fill them out,  
 22 pre-fill them?  
 23 MR. [REDACTED]: I'm sure they don't now.  
 24 MR. [REDACTED]: But did they at the time,  
 25 though?

1 jammed up for it?  
 2 MR. [REDACTED]: If I'm not getting jammed up,  
 3 if I did it, I sign it; if I didn't do it, and  
 4 you did it, because I won't sign for anybody  
 5 else.  
 6 MR. [REDACTED]: I gotcha. So, she was  
 7 signing for everybody else, but you wouldn't  
 8 sign for everybody else.  
 9 MR. [REDACTED]: Yeah. I didn't even -. I  
 10 didn't touch this paper at all that night.  
 11 MR. [REDACTED]: Okay. But previous to  
 12 that, would you have touched the papers?  
 13 MR. [REDACTED]: Previous to that, I probably  
 14 would have done rounds. But I wouldn't have  
 15 pre-populated the whole thing, like that.  
 16 MR. [REDACTED]: Would you ever pre-  
 17 populate any part of it?  
 18 MR. [REDACTED]: No. I don't think I pre-  
 19 populate. I don't remember a time that I did  
 20 pre-populate a thing or whatever. Now, what I  
 21 will say, because I know it's common or  
 22 whatever, in the beginning, I probably had  
 23 something pre-prepped for the count, and that  
 24 messed up or whatever.  
 25 MR. [REDACTED]: So, you would pre-prep

1 the count. Not a round.  
 2 MR. [REDACTED]: I pre-prepped the count slip  
 3 or whatever. I pre-prepped it.  
 4 MR. [REDACTED]: Okay. So, you pre-  
 5 prepped the count slips, but not the round  
 6 sheets.  
 7 MR. [REDACTED]: I didn't do this.  
 8 MR. [REDACTED]: Okay.  
 9 MR. [REDACTED]: No.  
 10 MR. [REDACTED]: Fair enough.  
 11 MR. [REDACTED]: And that's a lesson learned.  
 12 So, I learned my lesson --  
 13 MR. [REDACTED]: Sure.  
 14 MR. [REDACTED]: -- from that.  
 15 MR. [REDACTED]: Fair enough. Okay.  
 16 MR. [REDACTED]: Okay. And when you said you  
 17 pre-prepped the count, are you talking about  
 18 the night of August 9th?  
 19 MR. [REDACTED]: 4:00 p.m.  
 20 MR. [REDACTED]: The 4:00 p.m. count. That  
 21 was pre-prepped?  
 22 MR. [REDACTED]: Mm-hmm. I pre-prepped it  
 23 because of my -. There was so much going on,  
 24 everybody's leaving, some people coming in, and  
 25 stuff like that. I'm, like, okay, count time

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: All right. So, you're  
 3 saying that -.  
 4 MR. [REDACTED]: Because you will get pressured  
 5 to hurry up and finish the count, even though  
 6 the job to work in the SHU, the crew is  
 7 supposed to be four. Very rarely, you're going  
 8 to have four. You're asked to do the job with  
 9 four people, with sometimes three, and  
 10 sometimes two.  
 11 MR. [REDACTED]: Right.  
 12 MR. [REDACTED]: So, you're going to -. Your  
 13 phone is ringing, you're getting pressured,  
 14 you're getting supervisors coming at you. So,  
 15 if you don't have a way, you're going to find a  
 16 way.  
 17 MR. [REDACTED]: But that's what the  
 18 master sheet that you refer to?  
 19 MR. [REDACTED]: The E1.  
 20 MR. [REDACTED]: Oh, did you have access  
 21 to the E1?  
 22 MR. [REDACTED]: I don't think I had access to  
 23 the E1 at that time.  
 24 MR. [REDACTED]: So, how --  
 25 MR. [REDACTED]: Yeah.

1 or whatever you -. I wrote it out. I don't  
 2 remember if I put a number in there or not yet,  
 3 or whatever. And then, the count was supposed  
 4 to take place. So, I pre-wrote it or whatever.  
 5 And then, we just kept working. But there was  
 6 a lot going on that day. So.  
 7 MR. [REDACTED]: Perfect. So, going to  
 8 that paragraph, and then --  
 9 MR. [REDACTED]: Okay.  
 10 MR. [REDACTED]: -- you can clarify it.  
 11 MR. [REDACTED]: Yeah. So -.  
 12 MR. [REDACTED]: "When asked about the count  
 13 number in the SHU, for the -."  
 14 MR. [REDACTED]: Finish the paragraph,  
 15 too. Don't -.  
 16 MR. [REDACTED]: Yeah. "When asked about the  
 17 count number in the SHU, for the date, and the  
 18 number matching the MCC master number, [REDACTED]  
 19 stated, 'This would be a mistake on my part.'  
 20 He probably just used the numbers off the  
 21 master sheet, and that there was probably  
 22 signing off, down in response to pressure, and  
 23 having the count cleared."  
 24 MR. [REDACTED]: So, was this what you're  
 25 referring to?

1 MR. [REDACTED]: -- if you say that would  
 2 have been during this interview, then --  
 3 MR. [REDACTED]: Like, because I don't think I  
 4 had access to the E1 at that time. I think I  
 5 had -. It's another roster that we have in the  
 6 SHU. Like, not a running board. What is the  
 7 damn thing? I ain't been in there in a while.  
 8 SHU located. We have a SHU locator. And in  
 9 that or whatever, when people move, you change  
 10 it on that paper or whatever. Like, now - if  
 11 you've been up there - there's a board up there  
 12 now.  
 13 MR. [REDACTED]: Okay.  
 14 MR. [REDACTED]: You know? So, when you - on  
 15 that locator or whatever, that's probably what  
 16 I used because I don't believe I had access to  
 17 this at that time.  
 18 MR. [REDACTED]: All right. So, you  
 19 probably --  
 20 MR. [REDACTED]: Because I wasn't working  
 21 control at that time.  
 22 MR. [REDACTED]: -- so, at the time, you  
 23 used the SHU locator, and the amount of inmates  
 24 that were listed on the SHU locator, to fill  
 25 out the 4:00 p.m. count sheet?

1 MR. [REDACTED]: Yeah. Because, like, when  
 2 you're up there or whatever, like, the day  
 3 shift, they got to keep that SHU locator right  
 4 for the most part. You know what I'm saying?  
 5 You can't really screw that up.  
 6 MR. [REDACTED]: Okay.  
 7 MR. [REDACTED]: So, I was, like, okay. Boom.  
 8 And I - but like I said - I don't remember  
 9 writing a number in there or whatever, but if I  
 10 did, I did. That's my mistake. I own that.  
 11 MR. [REDACTED]: But you do remember that  
 12 you pre-populated it, though?  
 13 MR. [REDACTED]: I do remember that.  
 14 MR. [REDACTED]: Because it's -.  
 15 MR. [REDACTED]: Like, I know I wrote my name,  
 16 and then I wrote the date, and stuff like that,  
 17 or whatever.  
 18 MR. [REDACTED]: Let's take a look. I'm  
 19 showing you the E1.  
 20 MR. [REDACTED]: Mm-hmm.  
 21 MR. [REDACTED]: And the count sheets for -.  
 22 Is this for the 4:00 p.m. count on August 9th?  
 23 MR. [REDACTED]: Mm-hmm.  
 24 MR. [REDACTED]: Can you - this is the E1 on  
 25 the front, right?

1 number in here. I know I put the date and the  
 2 time, and then, I signed down here.  
 3 MR. [REDACTED]: Does that number look  
 4 like it was you?  
 5 MR. [REDACTED]: It looks like it --  
 6 MR. [REDACTED]: Okay.  
 7 MR. [REDACTED]: -- but I don't recall doing  
 8 it.  
 9 MR. [REDACTED]: Okay.  
 10 MR. [REDACTED]: I don't. I do not recall  
 11 doing that.  
 12 MR. [REDACTED]: Do you know if you  
 13 conducted the count at 4:00 p.m.?  
 14 MR. [REDACTED]: No.  
 15 MR. [REDACTED]: So, does that mean you  
 16 did not conduct the 4:00 p.m. count?  
 17 MR. [REDACTED]: I did not. Because, like, I  
 18 was -. That's why I'm at the bottom. I was,  
 19 like, I filled it out or whatever. All right.  
 20 We going to do this. We going to do that. And  
 21 I was running, too. I was ripping and running  
 22 or not. I thought that they did. So.  
 23 MR. [REDACTED]: All right. But you  
 24 didn't conduct the 4:00 p.m. count?  
 25 MR. [REDACTED]: No.

1 MR. [REDACTED]: Yeah. So, this is the 4:00  
 2 p.m. count, because this is printed out on  
 3 15:41.  
 4 MR. [REDACTED]: Take a look at the back, for  
 5 your CV, at the count slip that you - for that.  
 6 Keep going. Is it there?  
 7 MR. [REDACTED]: Just highlight it, so  
 8 that we can -. All right. So, ZA. That's the  
 9 SHU. Correct?  
 10 MR. [REDACTED]: Mm-hmm.  
 11 MR. [REDACTED]: And it shows 75?  
 12 MR. [REDACTED]: Mm-hmm.  
 13 MR. [REDACTED]: And then, done at 4:00  
 14 p.m. Who is listed on here?  
 15 MR. [REDACTED]: [REDACTED] and [REDACTED].  
 16 MR. [REDACTED]: All right. So, that's  
 17 yourself, correct? And then, you say you're the  
 18 one who filled that out right?  
 19 MR. [REDACTED]: Yeah.  
 20 MR. [REDACTED]: Is that your handwriting?  
 21 MR. [REDACTED]: Yeah. It looks like mine.  
 22 MR. [REDACTED]: All right. Cool.  
 23 MR. [REDACTED]: The date?  
 24 MR. [REDACTED]: Yeah, but I didn't -. But I  
 25 didn't put the -. I don't recall putting the

1 MR. [REDACTED]: You thought that they  
 2 did, though?  
 3 MR. [REDACTED]: I thought that they did.  
 4 MR. [REDACTED]: Do you know if they did?  
 5 MR. [REDACTED]: I think they did that, but I  
 6 don't know for sure right now. No.  
 7 MR. [REDACTED]: You're not sure?  
 8 MR. [REDACTED]: It's been too long.  
 9 MR. [REDACTED]: You didn't.  
 10 MR. [REDACTED]: Yeah.  
 11 MR. [REDACTED]: You signed it.  
 12 MR. [REDACTED]: I didn't.  
 13 MR. [REDACTED]: But you don't know if -.  
 14 All right. So, now you can go into those  
 15 questions.  
 16 MR. [REDACTED]: So.  
 17 MR. [REDACTED]: How many people are needed to  
 18 do the count?  
 19 MR. [REDACTED]: At least two.  
 20 MR. [REDACTED]: At least two?  
 21 MR. [REDACTED]: Mm-hmm.  
 22 MR. [REDACTED]: And you said that you don't  
 23 know if they did, but since you --  
 24 MR. [REDACTED]: Yeah. I was --  
 25 MR. [REDACTED]: -- signed it, it --

1 MR. [REDACTED]: -- it was an assumption. So,  
 2 that was my fault. So, I take that.  
 3 MR. [REDACTED]: Okay. So, technically, it  
 4 should have been you and whoever else --  
 5 MR. [REDACTED]: Mm-hmm.  
 6 MR. [REDACTED]: -- signed off on it, should  
 7 have done --  
 8 MR. [REDACTED]: Mm-hmm.  
 9 MR. [REDACTED]: -- but you don't recall doing  
 10 the count?  
 11 MR. [REDACTED]: Hmm-mm.  
 12 MR. [REDACTED]: No, not to recall. He  
 13 said he did not do the recall.  
 14 MR. [REDACTED]: Yeah.  
 15 MR. [REDACTED]: Yeah.  
 16 MR. [REDACTED]: He just said --  
 17 MR. [REDACTED]: That he did not.  
 18 MR. [REDACTED]: -- he doesn't know if the  
 19 other two did.  
 20 MR. [REDACTED]: Okay. Now, do you know if  
 21 that number was accurate?  
 22 MR. [REDACTED]: If - I'm going to find out  
 23 now. I'm sorry.  
 24 MR. [REDACTED]: Yeah. No problem.  
 25 MR. [REDACTED]: So, that number was accurate

1 assigned as a Special Housing Unit officer, I  
 2 proceeded to enter the Nine South visiting  
 3 room. As I walked towards the door, I observed  
 4 through the visiting room door, inmate  
 5 Fernandez, register number 86824-054, attempt  
 6 to grab an unknown item from his visitor. Once  
 7 inmate Fernandez reached to grab the item, I  
 8 called the door, and called for a lieutenant.  
 9 Once I was able to enter the visiting room, I  
 10 gave inmate Fernandez a direct order to walk  
 11 the visiting room, walk off the visiting room,  
 12 to conduct a visual search. Inmate Fernandez  
 13 complied, and a visual search was conducted.  
 14 The operations lieutenant was contacted, and  
 15 inmate Fernandez was removed from the unit."  
 16 MR. [REDACTED]: Mm-hmm.  
 17 MR. [REDACTED]: Now, this is the lieutenant  
 18 logs for that day. This is for August 9th.  
 19 This is day watch.  
 20 MR. [REDACTED]: Mm-hmm.  
 21 MR. [REDACTED]: The lieutenant log states,  
 22 "Inmate Fernandez, 86824054, on dry cell with  
 23 staff watch in R&D." If you look down here,  
 24 3:15 p.m., inmate Fernandez was placed on dry  
 25 cell.

1 there. So, if the base count was 76, that's  
 2 because Epstein was at his legal visit.  
 3 MR. [REDACTED]: Okay. I'm going to -. Let's  
 4 start off with the 4:00 p.m. count.  
 5 MR. [REDACTED]: (Indiscernible  
 6 \*00:48:03). This stuff. That's all. All  
 7 there.  
 8 MR. [REDACTED]: Okay. I'm going to show you  
 9 a memo. It's an email from [REDACTED],  
 10 to [REDACTED], and it's regarding to a shot.  
 11 Right before inmate, hmm, Leonardo Fernandez,  
 12 do you recall Fernandez - inmate Fernandez -  
 13 being in the SHU that day?  
 14 MR. [REDACTED]: I don't even know who that is.  
 15 MR. [REDACTED]: He was an inmate in the SHU.  
 16 And if you can read the -.  
 17 MR. [REDACTED]: You can just it for him.  
 18 You don't have to ask.  
 19 MR. [REDACTED]: Yeah. Well, yeah. This is  
 20 filled out by [REDACTED]. It's in regards to  
 21 Leonardo Fernandez. The incident date is  
 22 8/9/2019. It's at 1:40 p.m.  
 23 MR. [REDACTED]: Mm-hmm.  
 24 MR. [REDACTED]: "On August 9th, 2019, at  
 25 approximately 1:40 p.m., I, SOS [REDACTED], while

1 MR. [REDACTED]: Mm-hmm. And wait, the time  
 2 for this one was -?  
 3 MR. [REDACTED]: That just states the daily  
 4 sensitive information. So, this is --  
 5 MR. [REDACTED]: Okay.  
 6 MR. [REDACTED]: -- this is at 3:15 p.m. So,  
 7 I'm going to show you the midnight sheet count.  
 8 MR. [REDACTED]: Mm-hmm.  
 9 MR. [REDACTED]: From August 10th. This is  
 10 August 10th. Inmate Fernandez is - again - it  
 11 states there. If you notice, 12:35 a.m., it  
 12 was corrected. Inmate Fernandez was removed  
 13 from the SHU at 3:15 p.m., and was never keyed  
 14 out of the SHU.  
 15 MR. [REDACTED]: Show him the quarterly  
 16 assignment roster.  
 17 MR. [REDACTED]: Yeah.  
 18 MR. [REDACTED]: That's all in order.  
 19 Here it is.  
 20 MR. [REDACTED]: So, what happened was, when  
 21 the midnight lieutenant, [REDACTED], came  
 22 on --  
 23 MR. [REDACTED]: Mm-hmm.  
 24 MR. [REDACTED]: -- she realized there was a -  
 25 -

1 MR. [REDACTED]: A discrepancy.  
 2 MR. [REDACTED]: -- a discrepancy.  
 3 MR. [REDACTED]: Mm-hmm.  
 4 MR. [REDACTED]: So, she went in, she checked  
 5 it, and she corrected it at 12:35. If you  
 6 paid, if you look at the inmate history, of the  
 7 quarters for Fernandez, he was assigned to the  
 8 SHU --  
 9 MR. [REDACTED]: Mm-hmm.  
 10 MR. [REDACTED]: -- from August 2nd, at --  
 11 MR. [REDACTED]: 14:33.  
 12 MR. [REDACTED]: -- 14:33. And he was keyed  
 13 out on --  
 14 MR. [REDACTED]: On the 10th.  
 15 MR. [REDACTED]: -- August 10th. At 12:35  
 16 a.m.  
 17 MR. [REDACTED]: Mm-hmm.  
 18 MR. [REDACTED]: Now, if you -. Well, if he  
 19 was out of the SHU. Now, the day started off  
 20 with 77 inmates.  
 21 MR. [REDACTED]: Mm-hmm.  
 22 MR. [REDACTED]: And let's remember, don't  
 23 --  
 24 MR. [REDACTED]: So, that should have been 74.  
 25 MR. [REDACTED]: -- don't look at this.

1 MR. [REDACTED]: What's today's date again?  
 2 Seventh?  
 3 MR. [REDACTED]: 8/5.  
 4 MR. [REDACTED]: 8/5.  
 5 MR. [REDACTED]: So, like you said, you  
 6 just took the number off the master list and  
 7 filled that in?  
 8 MR. [REDACTED]: Yeah.  
 9 MR. [REDACTED]: So.  
 10 MR. [REDACTED]: Yeah.  
 11 MR. [REDACTED]: And when you say master  
 12 list, I mean actually, you called it something  
 13 different.  
 14 MR. [REDACTED]: The locator.  
 15 MR. [REDACTED]: The inmate locator.  
 16 Okay.  
 17 MR. [REDACTED]: This one, too.  
 18 MR. [REDACTED]: So, does that refresh  
 19 your memory now, though --  
 20 MR. [REDACTED]: Mm-hmm.  
 21 MR. [REDACTED]: -- that they didn't  
 22 provide you a number, you just filled that in  
 23 off of that?  
 24 MR. [REDACTED]: Mm-hmm.  
 25 MR. [REDACTED]: Yes?

1 MR. [REDACTED]: Yeah.  
 2 MR. [REDACTED]: Look at this.  
 3 MR. [REDACTED]: Okay.  
 4 MR. [REDACTED]: So, it should have been 74.  
 5 MR. [REDACTED]: So, now, you understand that  
 6 it was 74 inmates.  
 7 MR. [REDACTED]: Yes.  
 8 MR. [REDACTED]: Is that count accurate for  
 9 4:00 p.m.?  
 10 MR. [REDACTED]: No.  
 11 MR. [REDACTED]: So, was the count  
 12 conducted?  
 13 MR. [REDACTED]: No.  
 14 MR. [REDACTED]: No?  
 15 MR. [REDACTED]: No.  
 16 MR. [REDACTED]: Sorry, I didn't hear what  
 17 you -. Did you say -?  
 18 MR. [REDACTED]: No.  
 19 MR. [REDACTED]: No. All right. So, do  
 20 you know now that the count was not conducted?  
 21 MR. [REDACTED]: Yes.  
 22 MR. [REDACTED]: Okay. Great.  
 23 MR. [REDACTED]: Can you - same thing as  
 24 before - can you initial these documents to say  
 25 that these are the ones we showed you.

1 MR. [REDACTED]: Yes.  
 2 MR. [REDACTED]: Good. Thank you.  
 3 MR. [REDACTED]: This is the memo. Could you  
 4 just initial and date this for me? Do you have  
 5 anything else on that?  
 6 MR. [REDACTED]: No.  
 7 MR. [REDACTED]: On that count. Sorry. This  
 8 is the 5:00 p.m. count. Just initial the -.  
 9 Initial and date the 5:00 p.m. count here.  
 10 MR. [REDACTED]: 4:00 p.m.  
 11 MR. [REDACTED]: I mean 4:00 p.m. I keep  
 12 reading the bottom.  
 13 MR. [REDACTED]: It's all good.  
 14 MR. [REDACTED]: Move on?  
 15 MR. [REDACTED]: Yup.  
 16 MR. [REDACTED]: All right. "[REDACTED] was asked  
 17 several questions about Epstein, and  
 18 specifically if guard [REDACTED] advised about  
 19 Epstein needing a cell mate, to which [REDACTED]  
 20 responded, 'No.'" Do you -?  
 21 MR. [REDACTED]: Read that again.  
 22 MR. [REDACTED]: "[REDACTED] was asked several  
 23 questions about Epstein, and specifically, if  
 24 guard [REDACTED] advised about Epstein needing a  
 25 cell mate, to which [REDACTED] responded, 'No.'"

1 MR. [REDACTED]: Yeah. I didn't get that.  
 2 Okay. I thought you said I said that Epstein  
 3 didn't need --  
 4 MR. [REDACTED]: No.  
 5 MR. [REDACTED]: -- an inmate. Yeah. I'm,  
 6 like, nah, that -. I didn't have a -. I don't  
 7 remember having a conversation with [REDACTED]  
 8 about him telling me that Epstein needed a cell  
 9 mate or anything like that. No.  
 10 MR. [REDACTED]: What -?  
 11 MR. [REDACTED]: But he was supposed to have a  
 12 cell mate.  
 13 MR. [REDACTED]: He was supposed to have a  
 14 cell mate?  
 15 MR. [REDACTED]: He had a cell mate.  
 16 MR. [REDACTED]: So, why was he supposed to  
 17 have a cell mate?  
 18 MR. [REDACTED]: Well, no, I'm saying he had a  
 19 cell mate. It was the little, short dude.  
 20 That was his cell mate. I think his cell mate  
 21 got released that day.  
 22 MR. [REDACTED]: How do you know the cell mate  
 23 got released that day?  
 24 MR. [REDACTED]: Oh, just word of mouth,  
 25 because, like, I'm trying to remember what

1 with that, he's supposed to have. But you  
 2 can't put him with anybody.  
 3 MR. [REDACTED]: No, but you know --  
 4 MR. [REDACTED]: So, some -.  
 5 MR. [REDACTED]: -- you notified a  
 6 lieutenant?  
 7 MR. [REDACTED]: Yeah. So, somebody has to  
 8 tell me who they want me to put in there with  
 9 him. Because if you tell me to put somebody in  
 10 there, and that person beats him up.  
 11 MR. [REDACTED]: All right. So, if you  
 12 put him in at, you said, 9:30. Correct? Was  
 13 that when you're talking about?  
 14 MR. [REDACTED]: Yeah. When I - yeah - after  
 15 the shower. After he had his little phone call  
 16 and I put him back or whatever. Yeah, I asked,  
 17 like, does anybody want me to put him in there  
 18 with -.  
 19 MR. [REDACTED]: So, you're acting like  
 20 you're talking on the phone. So, did you get  
 21 on the phone with someone?  
 22 MR. [REDACTED]: Yeah. I got on the phone with  
 23 someone, and I, like, who it was at that time,  
 24 I don't remember.  
 25 MR. [REDACTED]: So, this, can you check the

1 happened because, like, because I remember,  
 2 when I put him in the cell, I was, like, where  
 3 the hell is your fucking cell mate at?  
 4 MR. [REDACTED]: So, you actually -. When  
 5 you put Epstein back from the shower, you mean?  
 6 MR. [REDACTED]: Yeah.  
 7 MR. [REDACTED]: You asked him where his -  
 8 ?  
 9 MR. [REDACTED]: I asked where, you know, where  
 10 is your cellie? Or whatever. So, he said,  
 11 like, he got released. So, I don't -. Like, I  
 12 don't know if he actually did get released or  
 13 not, or whatever, but that was the question,  
 14 like, but we don't have anybody else to put him  
 15 with. I don't remember who I spoke to that  
 16 night or whatever. But I asked that question,  
 17 like, there's no cell mate in there with this  
 18 guy.  
 19 MR. [REDACTED]: So, you asked someone?  
 20 MR. [REDACTED]: I asked someone, but who it  
 21 was, I don't remember who it was.  
 22 MR. [REDACTED]: Would it have been a  
 23 lieutenant?  
 24 MR. [REDACTED]: It would have been a  
 25 lieutenant. But my question -. But, like,

1 schedule --  
 2 MR. [REDACTED]: Mm-hmm.  
 3 MR. [REDACTED]: -- schedule, to - on the  
 4 roster.  
 5 MR. [REDACTED]: This is all --  
 6 MR. [REDACTED]: And I'm talking about  
 7 what time --  
 8 MR. [REDACTED]: (Indiscernible \*00:55:12).  
 9 MR. [REDACTED]: -- it would be, because I  
 10 mean, I think there's a shift change --  
 11 MR. [REDACTED]: Yeah. There's a shift change  
 12 --  
 13 MR. [REDACTED]: -- back then, at 10:00 --  
 14 MR. [REDACTED]: -- and then --  
 15 MR. [REDACTED]: -- 10:00 p.m. is when  
 16 there's that shift change.  
 17 MR. [REDACTED]: The lieutenant shift changes.  
 18 I don't even know what time it was.  
 19 (Indiscernible \*00:55:21)  
 20 MR. [REDACTED]: They show it was two  
 21 hours prior to --  
 22 MR. [REDACTED]: (Indiscernible \*00:55:23).  
 23 MR. [REDACTED]: -- to what the schedule  
 24 said back then. So, the Ops Lieutenant would  
 25 have been relieved at 10:00 p.m., and a new Ops

1 Lieutenant would have come back. So, if that  
 2 rings a bell.  
 3 MR. [REDACTED]: Yeah.  
 4 MR. [REDACTED]: I think it would have  
 5 been either --  
 6 MR. [REDACTED]: Because I know --  
 7 MR. [REDACTED]: -- it would have --  
 8 MR. [REDACTED]: -- well, I know this. I know  
 9 it wasn't --  
 10 MR. [REDACTED]: Here.  
 11 MR. [REDACTED]: -- I know I didn't speak to  
 12 Lieutenant [REDACTED].  
 13 MR. [REDACTED]: All right. So, this is --  
 14 MR. [REDACTED]: You know you didn't speak  
 15 to --. So, this would --  
 16 MR. [REDACTED]: -- no, this is --  
 17 MR. [REDACTED]: -- this was the 10th.  
 18 So, [REDACTED] replaced [REDACTED]. So, it would  
 19 have been either - I'm assuming - it would have  
 20 been either [REDACTED] or [REDACTED]. Now, what --  
 21 MR. [REDACTED]: So, it had to --  
 22 MR. [REDACTED]: -- what I'm showing you  
 23 right now is the daily assignment roster for  
 24 Saturday, August 10th, where it says that  
 25 [REDACTED] was the morning watch --

1 MR. [REDACTED]: -- at 9:30.  
 2 MR. [REDACTED]: Put him. You took him out of  
 3 the --  
 4 MR. [REDACTED]: Yeah, yeah, yeah.  
 5 MR. [REDACTED]: -- the showers.  
 6 MR. [REDACTED]: The showers.  
 7 MR. [REDACTED]: And then, brought him over to  
 8 the cell.  
 9 MR. [REDACTED]: Mm-hmm.  
 10 MR. [REDACTED]: So, let's say 9:30 onwards,  
 11 who would you have (Indiscernible \*00:56:29)?  
 12 MR. [REDACTED]: Well, no, no, no. Let's  
 13 clarify that, though. Is it before the shower,  
 14 when he was brought back to the SHU, or was it  
 15 after the shower that you noticed that there  
 16 wasn't a --  
 17 MR. [REDACTED]: After the shower.  
 18 MR. [REDACTED]: -- so, it was definitely  
 19 after the shower, and after the phone call?  
 20 MR. [REDACTED]: Yeah.  
 21 MR. [REDACTED]: Okay. And that's when  
 22 you (Indiscernible \*00:56:43) --  
 23 MR. [REDACTED]: And that's - and it's locking  
 24 time, so now, at that time, once you put him  
 25 back, there is no more movement.

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: -- officer who would have  
 3 come in the night before, at 10:00 p.m., and  
 4 relieved [REDACTED].  
 5 MR. [REDACTED]: Over here, actually, it  
 6 states, there's two possible lieutenants,  
 7 right? There's --  
 8 MR. [REDACTED]: [REDACTED].  
 9 MR. [REDACTED]: [REDACTED] was the acting --  
 10 MR. [REDACTED]: -- who was that, until 10:00  
 11 p.m.?  
 12 MR. [REDACTED]: -- Activities until 10:00  
 13 p.m.  
 14 MR. [REDACTED]: Mm-hmm.  
 15 MR. [REDACTED]: And then, there was [REDACTED].  
 16 MR. [REDACTED]: [REDACTED].  
 17 MR. [REDACTED]: That was there from --  
 18 MR. [REDACTED]: Until midnight.  
 19 MR. [REDACTED]: -- yeah, until midnight. So,  
 20 this conversation, when you went to Epstein's  
 21 cell, around what time do you think? You -  
 22 based on that memo - you took him out around  
 23 9:30.  
 24 MR. [REDACTED]: Put him in --  
 25 MR. [REDACTED]: Put him in.

1 MR. [REDACTED]: Okay. So, you  
 2 specifically recall --  
 3 MR. [REDACTED]: Asking.  
 4 MR. [REDACTED]: -- and that you asked  
 5 someone?  
 6 MR. [REDACTED]: I asked someone.  
 7 MR. [REDACTED]: And do you recall that it  
 8 was a lieutenant?  
 9 MR. [REDACTED]: Yeah. It had to be. Because  
 10 I called the lieutenant's office.  
 11 MR. [REDACTED]: You called. So, you know  
 12 that you called the lieutenant's office and  
 13 said --  
 14 MR. [REDACTED]: Mm-hmm. Like, yeah, this --  
 15 MR. [REDACTED]: -- he doesn't have a cell  
 16 mate?  
 17 MR. [REDACTED]: -- there's no cell mate here.  
 18 What do you want me to do? Or whatever. What  
 19 actually happened after that, I don't even  
 20 remember because I never even gave it a second  
 21 thought, after the fact.  
 22 MR. [REDACTED]: All right. So, after you  
 23 called, though, do you remember how that person  
 24 responded?  
 25 MR. [REDACTED]: Nah. I never even thought

1 about it again. I never thought about it again  
 2 until now. Now, I'm trying to rack my brain to  
 3 remember.  
 4 MR. [REDACTED]: Do you remember if it was  
 5 a man or a woman?  
 6 MR. [REDACTED]: I believe it was a man. But I  
 7 --  
 8 MR. [REDACTED]: You believe it was a man.  
 9 MR. [REDACTED]: -- I believe it was a man, but  
 10 I don't remember. I really don't.  
 11 MR. [REDACTED]: Okay. Because if it was  
 12 a man, it would have had to been [REDACTED].  
 13 MR. [REDACTED]: It would have been [REDACTED].  
 14 MR. [REDACTED]: Right?  
 15 MR. [REDACTED]: Yeah. It would have been  
 16 [REDACTED].  
 17 MR. [REDACTED]: And you know it wasn't --  
 18 MR. [REDACTED]: Because --  
 19 MR. [REDACTED]: -- [REDACTED].  
 20 MR. [REDACTED]: -- but I also know, too, that  
 21 when - if I'm working internally, and then,  
 22 like, I have to speak to a lieutenant,  
 23 sometimes the lieutenant is busy. I may pick  
 24 up the phone, and I'm not a lieutenant.  
 25 MR. [REDACTED]: Okay. So, it doesn't

1 know, because I was so busy that day, that I'm  
 2 just, like --  
 3 MR. [REDACTED]: This would have been --  
 4 MR. [REDACTED]: I got enough.  
 5 MR. [REDACTED]: -- this would have been  
 6 at the very end of your shift?  
 7 MR. [REDACTED]: This would have been at the  
 8 very end of my shift.  
 9 MR. [REDACTED]: So, would it have been  
 10 before you went up and checked on him, at that  
 11 --  
 12 MR. [REDACTED]: That would have been --  
 13 MR. [REDACTED]: -- next round?  
 14 MR. [REDACTED]: -- yeah, that would have been  
 15 --  
 16 MR. [REDACTED]: Or after?  
 17 MR. [REDACTED]: -- that would have been  
 18 before, and then, I checked on him again,  
 19 before I left. So, like, when I noticed it,  
 20 put him in, and I noticed that, made the phone  
 21 call. Then, before I leave, I check on him  
 22 again, and tell --  
 23 MR. [REDACTED]: Okay.  
 24 MR. [REDACTED]: -- hey, watch this guy.  
 25 MR. [REDACTED]: Okay. Did you - after

1 necessarily have to be a lieutenant in the  
 2 lieutenant's office.  
 3 MR. [REDACTED]: Not all the time, because  
 4 things happen. Sometimes the lieutenant may  
 5 call you, hey, I need you to go to this unit,  
 6 do X, Y, and Z. Now they're on the phone or  
 7 whatever. Grab that phone for me real quick.  
 8 It happens, but you know, you just relay the  
 9 messages and what have you.  
 10 MR. [REDACTED]: Okay. All right.  
 11 MR. [REDACTED]: And you said that could be  
 12 the internal?  
 13 MR. [REDACTED]: It could be. Is it? I don't  
 14 know. But I'm just saying, I know that I asked  
 15 that question. Who I did ask that question to,  
 16 I don't know at this time.  
 17 MR. [REDACTED]: Okay.  
 18 MR. [REDACTED]: I don't remember.  
 19 MR. [REDACTED]: So, just walk us through  
 20 what questions you asked and what response were  
 21 you given.  
 22 MR. [REDACTED]: Yeah. I know I said, hey,  
 23 this dude ain't got no cellee. I did say that.  
 24 This dude ain't got no cellee or whatever. And  
 25 after that, what actual response I got, I don't

1 you made the phone call, or when, first of all,  
 2 the phone call, do you remember the response  
 3 that you were given? When you said --  
 4 MR. [REDACTED]: I don't know.  
 5 MR. [REDACTED]: -- why doesn't this guy  
 6 have a cellee? Did you -?  
 7 MR. [REDACTED]: I don't remember.  
 8 MR. [REDACTED]: Did they say that they  
 9 would look into it, that they would check on  
 10 it?  
 11 MR. [REDACTED]: Probably, but I really don't  
 12 remember because I'm, like, after you get  
 13 frustrated, all right, I got this to do, I got  
 14 that to do, and then, you just -.  
 15 MR. [REDACTED]: Okay. Did you notify  
 16 [REDACTED] and [REDACTED] that he doesn't have a cell  
 17 mate?  
 18 MR. [REDACTED]: Well, they knew, but --  
 19 MR. [REDACTED]: They knew he didn't have  
 20 a cell mate?  
 21 MR. [REDACTED]: -- yeah, because they were up  
 22 there --  
 23 MR. [REDACTED]: They know?  
 24 MR. [REDACTED]: -- yeah.  
 25 MR. [REDACTED]: And did they know that he

1 was required to have a cell mate?  
 2 MR. [REDACTED]: Required. I don't know if  
 3 they knew that he was required to have a cell  
 4 mate. That, I don't know.  
 5 MR. [REDACTED]: But everybody that comes  
 6 off -. He was in suicide watch, previously.  
 7 Correct?  
 8 MR. [REDACTED]: Right.  
 9 MR. [REDACTED]: And every inmate that  
 10 comes off of suicide watch --  
 11 MR. [REDACTED]: Suicide watch. Should have a  
 12 cell mate.  
 13 MR. [REDACTED]: So, based upon that, they  
 14 knew he was required to have a cell mate.  
 15 Correct?  
 16 MR. [REDACTED]: Yeah, based off of that, they  
 17 would know.  
 18 MR. [REDACTED]: Okay. And was that a  
 19 discussion that you had with anyone in there,  
 20 that day, about, hey, where is his cell mate?  
 21 MR. [REDACTED]: I think we did ask that  
 22 question amongst ourselves, too, like, this  
 23 dude is supposed to have a cell mate. I think  
 24 we did.  
 25 MR. [REDACTED]: Is this before or after?

1 MR. [REDACTED]: Yeah. So, that's definitely  
 2 the discussion that -. That would have  
 3 happened after I took him out of the shower and  
 4 put him in his cell, and realized there was no  
 5 cell mate in there. That would have been the  
 6 discussion afterwards.  
 7 MR. [REDACTED]: And you do remember  
 8 talking with both [REDACTED] and [REDACTED], saying he  
 9 doesn't have a cell mate?  
 10 MR. [REDACTED]: Yup. Briefly, though. There  
 11 wasn't, like, a long, drawn-out -.  
 12 MR. [REDACTED]: Sure. Do you remember  
 13 what their responses were?  
 14 MR. [REDACTED]: I think it was just something,  
 15 like, yeah, we're just telling each other  
 16 what's going on. And continue business.  
 17 MR. [REDACTED]: Was there anything talked  
 18 about, like, where is he?  
 19 MR. [REDACTED]: Yeah, and that's when we found  
 20 out, like, this guy must be released or  
 21 whatever. So, there was a conversation about  
 22 that. But who actually said, oh, this dude got  
 23 released, or whatever, I don't remember.  
 24 MR. [REDACTED]: Okay.  
 25 MR. [REDACTED]: Everything was moving so fast.

1 After --  
 2 MR. [REDACTED]: Shower?  
 3 MR. [REDACTED]: -- yeah, after the shower.  
 4 That this conversation between you, [REDACTED] --  
 5 MR. [REDACTED]: This was after the shower.  
 6 MR. [REDACTED]: -- took place.  
 7 MR. [REDACTED]: Well, after the shower is  
 8 when you called, but what you're saying is  
 9 that, at - or are you saying that, after the  
 10 shower, after the phone call --  
 11 MR. [REDACTED]: Right.  
 12 MR. [REDACTED]: -- so, not after the  
 13 shower, but after the phone call in the shower,  
 14 is that when you had the conversation with [REDACTED]  
 15 and [REDACTED]?  
 16 MR. [REDACTED]: Yeah.  
 17 MR. [REDACTED]: So, you think at that  
 18 point --  
 19 MR. [REDACTED]: Because that's when I, like,  
 20 oh, shit, the dude ain't got no cell mate.  
 21 MR. [REDACTED]: And you would have --  
 22 MR. [REDACTED]: Sorry. Excuse my language.  
 23 MR. [REDACTED]: -- and you would have  
 24 conversed, saying, like, hey, he doesn't have a  
 25 cell mate right now?

1 And it was so long ago now.  
 2 MR. [REDACTED]: Was there any  
 3 conversation about, like, hey, we need to  
 4 notify somebody to get him a cell mate?  
 5 MR. [REDACTED]: Probably was, but I know I  
 6 made a phone call to someone, like, hey, what  
 7 do you want me to do with this guy? He ain't  
 8 got no cellee. I know I made a phone call to  
 9 someone. Who it was, at this point, I don't  
 10 remember.  
 11 MR. [REDACTED]: And that -.  
 12 MR. [REDACTED]: I wish they would have asked  
 13 me that question earlier because I probably  
 14 would have remembered then.  
 15 MR. [REDACTED]: Right. So, and that's,  
 16 like, under oath, this is, like, if you were on  
 17 the stand, literally in front of a judge --  
 18 MR. [REDACTED]: Mm-hmm.  
 19 MR. [REDACTED]: -- you swear under oath  
 20 that you made a phone call and notified  
 21 someone?  
 22 MR. [REDACTED]: I notified someone. Who it  
 23 was, I don't know.  
 24 MR. [REDACTED]: Okay. So, if we checked  
 25 the, like, the lines and the recordings, we'll

1 be able to find --  
 2 MR. [REDACTED]: You should be able to find  
 3 that, yes.  
 4 MR. [REDACTED]: -- okay. And then,  
 5 again, that would be, like, a penalty and  
 6 perjury of law, like, you know --  
 7 MR. [REDACTED]: Mm-hmm.  
 8 MR. [REDACTED]: -- you could get - you  
 9 can literally get charged if you're lying to us  
 10 because we're federal agents and you're under  
 11 oath.  
 12 MR. [REDACTED]: Mm-hmm.  
 13 MR. [REDACTED]: So, you're positive about  
 14 that statement, that you called someone and  
 15 notified them around 9:30 at night?  
 16 MR. [REDACTED]: I believe so. But if -.  
 17 Because I spoke to people about this. I know I  
 18 spoke to people about this.  
 19 MR. [REDACTED]: So, yeah. Just remember,  
 20 any -. We're just going to shut up for a  
 21 second, and let you think about who did you  
 22 speak with and what conversations were had.  
 23 What was stated?  
 24 MR. [REDACTED]: Mm-hmm.  
 25 MR. [REDACTED]: From the beginning of

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: And then, is there -.  
 3 Did we -? No, we didn't print out any of those  
 4 other documents. So, he was gone from the MCC  
 5 by 8:00, at least 8:30 a.m.  
 6 MR. [REDACTED]: Okay.  
 7 MR. [REDACTED]: So, you started at 2:00  
 8 p.m. What conversations can you remember that  
 9 you had, regarding Reyes being gone from the  
 10 institution?  
 11 MR. [REDACTED]: I don't. I remember finding  
 12 out that Reyes was gone when I put Epstein back  
 13 in his cell. That's when I remember that he  
 14 was gone.  
 15 MR. [REDACTED]: So, you -.  
 16 MR. [REDACTED]: I mean, that's when I realized  
 17 that he was gone because I'm, like, there's  
 18 supposed to be two people in here  
 19 MR. [REDACTED]: So, prior to that time,  
 20 you didn't know, at all, that Reyes was gone?  
 21 MR. [REDACTED]: Yeah, because I'm thinking  
 22 about it to myself, as we walk -.  
 23 MR. [REDACTED]: Sorry. He's giving me  
 24 documents to show you what happened to him.  
 25 So, this is from the Marshal Service. I don't

1 that day. So, here, I'm going to show you a  
 2 document, and this is - again - that  
 3 lieutenant's log, saying that, at 8:38 a.m.,  
 4 Reyes was pre-removed. And do you know that,  
 5 when you're pre-removed, that means you're  
 6 released from the MCC. Correct?  
 7 MR. [REDACTED]: Mm-hmm.  
 8 MR. [REDACTED]: Do you know that?  
 9 MR. [REDACTED]: That, well, yeah. It's a -.  
 10 So, could I see that?  
 11 MR. [REDACTED]: Yeah.  
 12 MR. [REDACTED]: So.  
 13 MR. [REDACTED]: And here is the 38 to go  
 14 along with that, and the daily log.  
 15 MR. [REDACTED]: Okay.  
 16 MR. [REDACTED]: Which shows that he was  
 17 pre-removed at 8:38.  
 18 MR. [REDACTED]: A.m.  
 19 MR. [REDACTED]: A.m.  
 20 MR. [REDACTED]: Okay.  
 21 MR. [REDACTED]: So, he left. He left the  
 22 SHU, I'm assuming, before then. That's when he  
 23 was keyed out.  
 24 MR. [REDACTED]: Mm-hmm.  
 25 MR. [REDACTED]: By R&D. Correct?

1 believe that you would have received this  
 2 email, but I'm just showing you.  
 3 MR. [REDACTED]: Mm-hmm.  
 4 MR. [REDACTED]: You can say if you  
 5 remember it. This is -. Did you ever see one  
 6 of these? This is a prisoner's schedule.  
 7 MR. [REDACTED]: No.  
 8 MR. [REDACTED]: The Marshal Service. So,  
 9 the Reyes right here, it shows that he was  
 10 gone, transferred within - per the judge - from  
 11 the MCC to GO. Do you know what GEO is?  
 12 MR. [REDACTED]: I've heard that term before,  
 13 but -.  
 14 MR. [REDACTED]: So, GEO is a --  
 15 MR. [REDACTED]: Contract.  
 16 MR. [REDACTED]: -- contract --  
 17 MR. [REDACTED]: Yeah. (Indiscernible  
 18 \*01:04:23).  
 19 MR. [REDACTED]: -- which was going around  
 20 here.  
 21 MR. [REDACTED]: Okay.  
 22 MR. [REDACTED]: This would have been sent  
 23 to all these people in custody, from R&D, as  
 24 well as to all the lieutenants.  
 25 MR. [REDACTED]: Okay.

1 MR. [REDACTED]: So, based upon this, they  
 2 would have generated what's called, I think, a  
 3 call out list. Do you know that?  
 4 MR. [REDACTED]: I know what a call out list  
 5 is. Yes.  
 6 MR. [REDACTED]: And then, we're of the  
 7 understanding, based upon this information,  
 8 next to Reyes name would have been WAB. Do you  
 9 know what that means?  
 10 MR. [REDACTED]: Yes.  
 11 MR. [REDACTED]: What does that mean?  
 12 MR. [REDACTED]: Like, I mean, offhand, I don't  
 13 know what the actual acronym means, but it does  
 14 mean that somebody is getting removed from the  
 15 building, whether they're being released, sent  
 16 to another institution, what have you.  
 17 MR. [REDACTED]: All right. So, that  
 18 would have -. It means, "With All Belongings."  
 19 And it means that they take all their stuff  
 20 because they're leaving.  
 21 MR. [REDACTED]: Mm-hmm.  
 22 MR. [REDACTED]: Do you remember, that  
 23 date, seeing that call out list? Would that be  
 24 maintained in the SHU for the (Indiscernible  
 25 \*01:05:06)?

1 MR. [REDACTED]: Yeah.  
 2 MR. [REDACTED]: -- so, is that something  
 3 that they keep in the SHU all day long?  
 4 MR. [REDACTED]: Yeah. Once you receive it.  
 5 All for the morning shift, because usually,  
 6 morning shift, depending on your internal, you  
 7 might get that paperwork probably about 3:00 or  
 8 something. You know, after you - as you're  
 9 conducting counts. So, you conduct counts, and  
 10 they come through and they hand you your roster  
 11 for the day. The call out sheets, the separate  
 12 rosters.  
 13 MR. [REDACTED]: And is that maintained,  
 14 though --  
 15 MR. [REDACTED]: Yes.  
 16 MR. [REDACTED]: -- throughout the day?  
 17 So, that, like --  
 18 MR. [REDACTED]: It's supposed to be.  
 19 MR. [REDACTED]: -- for instance -. Okay.  
 20 So, if somebody goes to court, you know, on  
 21 that list, it says this guy is court, it says  
 22 this guy is WAB, it says, you know, so that you  
 23 know where inmates are?  
 24 MR. [REDACTED]: Well, R&D will have the -. It  
 25 will be a court roster for R&D. And it's

1 MR. [REDACTED]: I don't remember seeing that  
 2 call out list. I do not.  
 3 MR. [REDACTED]: And in general, would the  
 4 call out list be maintained in the SHU, though?  
 5 MR. [REDACTED]: No. The call out list is  
 6 basically before R&D leaves for the night.  
 7 They print out the call out sheets for the next  
 8 day, and over the course of the morning shift,  
 9 internal, when they give out the daily rosters,  
 10 will give out the call out sheets to every  
 11 unit.  
 12 MR. [REDACTED]: Mm-hmm.  
 13 MR. [REDACTED]: For the following day. For  
 14 the next morning.  
 15 MR. [REDACTED]: And then, is that call  
 16 out list, though, like, for instance, the call  
 17 out list of the SHU, was that maintained in the  
 18 SHU at all, when they (Indiscernible  
 19 \*01:05:34)?  
 20 MR. [REDACTED]: Yeah. Once you have it in the  
 21 SHU or whatever, usually, they'll have it on  
 22 the desk with the rest of the paperwork. So,  
 23 you know what you're looking at. If you've got  
 24 to get somebody ready.  
 25 MR. [REDACTED]: Okay. So --

1 another -.  
 2 MR. [REDACTED]: Wouldn't that all be  
 3 listed on the call --  
 4 MR. [REDACTED]: Yeah.  
 5 MR. [REDACTED]: -- list, though?  
 6 MR. [REDACTED]: It would. Yeah, it would.  
 7 MR. [REDACTED]: So, point being is if,  
 8 like, if you're doing counts at 4:00 p.m., you  
 9 have that call list to be able to say, oh,  
 10 shit, this guy is at court, he's not back yet.  
 11 I need to find out where he is. Is that what  
 12 happens?  
 13 MR. [REDACTED]: Mm-hmm. Yeah. That's what's  
 14 supposed to happen. Yes.  
 15 MR. [REDACTED]: So, the questions that  
 16 all of that was, do you remember seeing that  
 17 call out list on August 9, 2019?  
 18 MR. [REDACTED]: I don't remember seeing it.  
 19 MR. [REDACTED]: No?  
 20 MR. [REDACTED]: No.  
 21 MR. [REDACTED]: But would it have been  
 22 there?  
 23 MR. [REDACTED]: It should have been there, but  
 24 I don't remember seeing it.  
 25 MR. [REDACTED]: Okay.

1 MR. [REDACTED]: Everybody waves differently.  
 2 So, I may put my paperwork on the clipboard.  
 3 Somebody else may like to have three stacks of  
 4 paper over here.  
 5 MR. [REDACTED]: Okay. But what you're  
 6 saying is that you did know, on August 9th,  
 7 that Reyes was gone, and he was Epstein's cell  
 8 mate, and Epstein was without a cell mate. But  
 9 you're saying you didn't know it until 9:30  
 10 p.m.?  
 11 MR. [REDACTED]: Yeah.  
 12 MR. [REDACTED]: And at that point, you  
 13 did call someone, in the lieutenant's office?  
 14 MR. [REDACTED]: Yeah.  
 15 MR. [REDACTED]: So, you definitely know  
 16 it was the lieutenant's office --  
 17 MR. [REDACTED]: I know.  
 18 MR. [REDACTED]: -- that you called?  
 19 MR. [REDACTED]: I called someone. So, like,  
 20 let me rephrase and put it like this. That I  
 21 noticed it. I had discussions with, you know,  
 22 (Indiscernible \*01:07:29), I said something  
 23 about it to them, and I called someone. Who I  
 24 spoke to, I do not remember. But I know I  
 25 called someone. And it had to be somebody

1 reason why we're reading this to you is to,  
 2 one) make sure that you --  
 3 MR. [REDACTED]: That it's accurate.  
 4 MR. [REDACTED]: -- it's accurate, but  
 5 also to refresh your memory. This is what you  
 6 stated to these people, is that accurate, and -  
 7 again - to fill in some of these blanks. Now,  
 8 we have a memo that was drafted on August 12th,  
 9 2019. Let's see if it was - it says United  
 10 States government, Federal Bureau of Prisons  
 11 memo. And it says, past information from  
 12 Special Housing Unit. It says, "On Friday,  
 13 August 9th, 2019, at approximately 1:50 p.m.,  
 14 I, SOS [REDACTED], passed on to oncoming staff  
 15 member, Officer [REDACTED], and present staff, SOS  
 16 [REDACTED] and Officer [REDACTED], that inmate Reyes  
 17 was going WAB, and possibly may return, also  
 18 that inmate Epstein will be needing a cell mate  
 19 upon arrival from his attorney visit." Do you  
 20 know if -?  
 21 MR. [REDACTED]: I don't remember having that  
 22 conversation with [REDACTED].  
 23 MR. [REDACTED]: Do you remember that that  
 24 conversation had, or do you believe that he's  
 25 lying to us? If he swore under oath that he

1 higher than me. Because I can't make that  
 2 decision.  
 3 MR. [REDACTED]: Sure. And you think it  
 4 was a man? You don't think it was [REDACTED]?  
 5 MR. [REDACTED]: I think it was -  
 6 MR. [REDACTED]: Or -?  
 7 MR. [REDACTED]: -- I'm pretty sure it was a  
 8 male. I think it was a man. But being that it  
 9 was so long ago, I can't remember exactly what  
 10 I said on a brief phone call --  
 11 MR. [REDACTED]: Sure.  
 12 MR. [REDACTED]: -- you know --  
 13 MR. [REDACTED]: I understand. Yeah. I  
 14 mean, we're -. Yeah --  
 15 MR. [REDACTED]: -- I'm just being honest with  
 16 you.  
 17 MR. [REDACTED]: -- we're two years later.  
 18 I got you.  
 19 MR. [REDACTED]: You know?  
 20 MR. [REDACTED]: And so -.  
 21 MR. [REDACTED]: And honestly, I thought this  
 22 was over. So, I was, like --  
 23 MR. [REDACTED]: Right. Yeah. No. This  
 24 is where -. That's why we're back, coming back  
 25 to people to try to, like -. Part of the

1 definitely passed that information onto you --  
 2 MR. [REDACTED]: You got a --  
 3 MR. [REDACTED]: -- and he's got this  
 4 memo.  
 5 MR. [REDACTED]: Mm-hmm.  
 6 MR. [REDACTED]: That he also did. Do you  
 7 believe he's lying about it?  
 8 MR. [REDACTED]: If he did, you might want to  
 9 ask [REDACTED] about that one because I do not  
 10 recall him speaking to me about this one.  
 11 MR. [REDACTED]: Okay.  
 12 MR. [REDACTED]: I don't necessarily want to  
 13 call anyone a liar, per se, but I don't  
 14 remember him speaking to me about this. So,  
 15 maybe he spoke to [REDACTED] and maybe I was  
 16 standing there, and he thought I heard him.  
 17 MR. [REDACTED]: Okay.  
 18 MR. [REDACTED]: But that's my assumption, but  
 19 I do not remember having this conversation with  
 20 him at all.  
 21 MR. [REDACTED]: All right. So, if he's  
 22 saying, you know, [REDACTED] was standing there, I  
 23 relayed the information specifically to [REDACTED],  
 24 saying, hey, what you call, it's WAB, Epstein  
 25 is going to need a new cell mate. You do not

1 recall that conversation?  
 2 MR. [REDACTED]: I don't recall that  
 3 conversation.  
 4 MR. [REDACTED]: Now, what is your opinion  
 5 of the fact that, if an inmate is WAB, that  
 6 means that he's not coming home --  
 7 MR. [REDACTED]: Yeah.  
 8 MR. [REDACTED]: -- right? What is your  
 9 opinion of the fact that he said, possibly may  
 10 not return? Why would he say - if someone is  
 11 WAB - why would he say possibly may not return?  
 12 MR. [REDACTED]: I don't know.  
 13 MR. [REDACTED]: Because your  
 14 understanding was, if someone was WAB --  
 15 MR. [REDACTED]: If it was WAB --  
 16 MR. [REDACTED]: -- you're not --  
 17 MR. [REDACTED]: -- he's supposed to be gone.  
 18 MR. [REDACTED]: He was gone. Correct?  
 19 MR. [REDACTED]: But - okay, so, with that --  
 20 MR. [REDACTED]: So, if --  
 21 MR. [REDACTED]: -- if he says possibly may  
 22 return or whatever, because this has happened,  
 23 usually, I've seen it before with other  
 24 inmates. You see somebody that says if they're  
 25 WAB, they're supposed to leave this date, their

1 Epstein is in the cell, because I'm assuming  
 2 with how it happened, I'm assuming he goes WAB,  
 3 Epstein goes to a legal visit, now your day is  
 4 going on and everything like that. And it's  
 5 just escaped everybody.  
 6 MR. [REDACTED]: Mm-hmm.  
 7 MR. [REDACTED]: That's what I'm thinking  
 8 happened. But yeah, he should have been  
 9 replaced during that shift.  
 10 MR. [REDACTED]: Mm-hmm.  
 11 MR. [REDACTED]: But if you don't have the  
 12 numbers, that's another question, that I'll  
 13 ask. If you don't have the numbers in the SHU,  
 14 if you have, like, an odd number, and you can't  
 15 put anybody with him. What are you going to  
 16 do?  
 17 MR. [REDACTED]: Or are you aware that  
 18 Epstein's cell mates were all vetted at the  
 19 highest level?  
 20 MR. [REDACTED]: No.  
 21 MR. [REDACTED]: So, in your opinion, if  
 22 you knew that Epstein was required to have a  
 23 cell mate, could have you just placed a cell  
 24 mate with him?  
 25 MR. [REDACTED]: No. I don't have that

1 stuff is packed up or whatever, and then,  
 2 something happens, and then, they can't go --  
 3 They can't leave. Like, but that's usually if  
 4 they're going to another institution or  
 5 something. Now, if this dude actually got  
 6 released or whatever, I don't see why - any  
 7 reason. Unless the judge put a hold on him.  
 8 MR. [REDACTED]: Well, he didn't get  
 9 released. Like I showed you. He got  
 10 transferred.  
 11 MR. [REDACTED]: Yeah. So, yeah. So, I don't  
 12 see, you know, like, unless the judge  
 13 miraculously put a hold on you or something  
 14 like that, I don't know why he said possibly.  
 15 MR. [REDACTED]: So, I guess my question  
 16 on that would be, then, if he's at least by  
 17 8:38 a.m., WAB, gone from the SHU, should  
 18 someone have --  
 19 MR. [REDACTED]: Yes.  
 20 MR. [REDACTED]: -- replaced him  
 21 beforehand?  
 22 MR. [REDACTED]: Yes. Replaced him and, yeah,  
 23 somebody should have --. Like, because during  
 24 the day shift or whatever, this dude leaves, he  
 25 goes to WAB or whatever, and you know that it's

1 authority to do that. Because if I was to --  
 2 MR. [REDACTED]: So, who has the  
 3 authority?  
 4 MR. [REDACTED]: -- if I was to make that  
 5 decision, and something happened to him, now  
 6 I'm screwed.  
 7 MR. [REDACTED]: So, who should have  
 8 placed him with a cell mate? That's place  
 9 Epstein with a new cell mate.  
 10 MR. [REDACTED]: It would have been one of us  
 11 to probably put the inmate in that cell. But  
 12 that determination would either come from the  
 13 operations lieutenant, the SHU lieutenant, or  
 14 the captain.  
 15 MR. [REDACTED]: Okay.  
 16 MR. [REDACTED]: Or anybody above that.  
 17 MR. [REDACTED]: Sure.  
 18 MR. [REDACTED]: But that's where the decision  
 19 would come from. They'll probably just tell  
 20 me, like, hey, execute.  
 21 MR. [REDACTED]: So, in your opinion,  
 22 based upon the information that we have, with  
 23 him going WAB, should the activities, ops, or a  
 24 captain have been notified, and those people  
 25 should have ensured that Epstein was --?

1 MR. [REDACTED]: Yes. Because if - like, all  
2 right, after all the stuff that we've seen here  
3 - if I was to, like, let's just say I was to  
4 put somebody in that cell, and something  
5 happened. Now I made the wrong decision, and  
6 then, the next question is going to be, well,  
7 why didn't you ask questions?

8 MR. [REDACTED]: Mm-hmm.

9 MR. [REDACTED]: So, I would not put somebody  
10 in there without somebody giving me the green  
11 light to do so.

12 MR. [REDACTED]: Now, if - was [REDACTED]  
13 the OIC back then?

14 MR. [REDACTED]: I think so.

15 MR. [REDACTED]: All right. So --

16 MR. [REDACTED]: For the day shift.

17 MR. [REDACTED]: -- so, [REDACTED] is the  
18 OIC. If him, the activities lieutenant, and  
19 the ops lieutenant, all for that day shift are  
20 saying, well, we didn't know if Reyes was going  
21 to come back or not, so we thought it was  
22 premature to place a new cell mate in there  
23 with him. Is that a legit excuse, do you  
24 think, or a reason, if the person is listed  
25 with WAB next to their name?

1 because, once you got there, you were just  
2 running?

3 MR. [REDACTED]: I was running, hopping and  
4 popping the whole time.

5 MR. [REDACTED]: Okay.

6 MR. [REDACTED]: Pretty much. I'm sweating.  
7 Everything.

8 MR. [REDACTED]: Okay.

9 MR. [REDACTED]: But we were all tired that  
10 day.

11 MR. [REDACTED]: Okay.

12 MR. [REDACTED]: I know you didn't know until  
13 9:30 p.m. When do you think would have been  
14 the first time you should have caught up to the  
15 fact that Reyes was not there?

16 MR. [REDACTED]: I was doing rounds, because in  
17 my mind, because I'm thinking about it, like,  
18 like how Epstein is the priority. So, if I'm  
19 working out ranges, and I'm talking to inmates  
20 here and there, and I had two other inmates on  
21 that tier where Epstein was, that wanted to  
22 play the suicide game, you know, as I walked  
23 through there, or whatever, I know this is  
24 Epstein's cell. I know Epstein is not here.  
25 Even when you look in there, you just keep

1 MR. [REDACTED]: Depending on how they looking  
2 at it, like, because - like I said before - if  
3 he's WAB and, like, maybe the bus got cancelled  
4 or whatever, and then, somebody would have to  
5 come back. If you're thinking about it that  
6 way, then yes. But if he was gone at 8:00  
7 something in the morning, then he ain't never  
8 coming back.

9 MR. [REDACTED]: At 2:00 p.m., he's still  
10 not back, wouldn't they know by then if that  
11 was --

12 MR. [REDACTED]: That's what I --

13 MR. [REDACTED]: -- truly WAB?

14 MR. [REDACTED]: -- that's what I would think.

15 MR. [REDACTED]: Okay. But you do not  
16 recall him specifically saying that to you?

17 MR. [REDACTED]: Hmm-mm.

18 MR. [REDACTED]: So, you believe, the  
19 first time that you - you did know, on August  
20 9th - but you believe the first time that you  
21 knew was at 9:30 p.m.

22 MR. [REDACTED]: That's the first time I think  
23 I knew, because it was too much running around.  
24 I don't not remember this conversation at all.

25 MR. [REDACTED]: Okay. And that's

1 going. And then, you know, you just keep going  
2 or whatever. So, like, it should have dawned  
3 on me then, but I'm thinking about this guy  
4 over here, that may have, you know, that had  
5 the noose around him, and he wants to play that  
6 game. And then, you got another inmate on  
7 another tier, doing some other crazy nonsense.  
8 There was just a lot of moving pieces that day.  
9 So, even in my movement around or whatever,  
10 like, it missed - it escaped it - it missed me.

11 MR. [REDACTED]: Yeah. And that was what  
12 I was going to go to, after that, is the fact  
13 that, would this have been the only - this  
14 mandatory rounds must be conducted every 30  
15 minutes on Epstein, as per God - would that  
16 have been the only orange card that was up  
17 there? Saying to make sure that Epstein is your  
18 priority in the SHU right now?

19 MR. [REDACTED]: It shouldn't have been. Like,  
20 I don't remember if there was anything on his  
21 door, or anything like that, or whatever. But  
22 I remember that. That, you know, that was per  
23 God, obviously, that's a joke.

24 MR. [REDACTED]: Yeah, yeah, yeah.

25 MR. [REDACTED]: But I do remember, it was

1 something else on a wall, at some point in  
2 time, about, like, yeah, make sure you watch  
3 this guy. So, I don't remember if it was a  
4 memo or something, but it was something else.  
5 But I definitely remember that one. If I'm not  
6 mistaken, there was more than one copy of that  
7 thing.

8 MR. [REDACTED]: Okay. So, but what I'm  
9 asking, was there anybody, any other inmate  
10 names, such as this, or was inmate your  
11 priority when you were in the SHU?

12 MR. [REDACTED]: No. No. I don't remember any  
13 of the inmates' name. I just remember that.

14 MR. [REDACTED]: So, this is the one guy  
15 that's up on the desk, on the officer's  
16 station, saying, making sure you're checking on  
17 him --

18 MR. [REDACTED]: Mm-hmm.

19 MR. [REDACTED]: -- on Epstein. So, that  
20 was what I was going to get at. If these  
21 rounds were actually conducted on L-tier,  
22 through that whole time, that that cell is  
23 empty --

24 MR. [REDACTED]: Mm-hmm.

25 MR. [REDACTED]: -- how did people not

1 notice Epstein's cell mate is gone?

2 MR. [REDACTED]: Right. And now, this right  
3 here --

4 MR. [REDACTED]: And I'm not talking about  
5 just your watch. So, night watch --

6 MR. [REDACTED]: Yeah.

7 MR. [REDACTED]: -- as well as day watch.

8 MR. [REDACTED]: Yeah. So, day watch, oh, no,  
9 this is morning watch. So, okay.

10 MR. [REDACTED]: Yeah. This is day watch.

11 MR. [REDACTED]: Yeah. So, day watch. Like,  
12 obviously, through here, they got rid of him.  
13 And, like, that, there should have been  
14 something done there.

15 MR. [REDACTED]: Yeah. I mean, he's  
16 claiming, he's the guy who was apparently, you  
17 know, [REDACTED] is apparently signing this, I  
18 believe, for all these. He's claiming, yeah, I  
19 passed on the information, he's gone, he's  
20 going to need a new cell mate, if he, in fact,  
21 doesn't come back.

22 MR. [REDACTED]: Mm-hmm.

23 MR. [REDACTED]: So, all right, he's  
24 swearing under oath that, and he wrote a memo,  
25 as well. And he swore a couple times to that.

1 As far as --

2 MR. [REDACTED]: Okay. So, now I got to write  
3 a memo, right?

4 MR. [REDACTED]: -- so, well, that's what  
5 - you don't have to write a memo, we're talking  
6 to you. So, as far as this goes, the question  
7 would be: how are anybody that's working - so,  
8 it's you --

9 MR. [REDACTED]: [REDACTED].

10 MR. [REDACTED]: -- did [REDACTED] start  
11 then?

12 MR. [REDACTED]: I think [REDACTED] comes in at  
13 4:00.

14 MR. [REDACTED]: So, it's at -. Okay. So  
15 --

16 MR. [REDACTED]: He's already here.

17 MR. [REDACTED]: -- you four --

18 MR. [REDACTED]: He's on (Indiscernible  
19 \*01:17:22).

20 MR. [REDACTED]: -- it said four. It's  
21 you, [REDACTED], and [REDACTED].

22 MR. [REDACTED]: Mm-hmm.

23 MR. [REDACTED]: How was it not noticed -  
24 if these rounds on this round sheet were  
25 conducted - how was it not noticed, even prior

1 to 9:30, if you're saying you noticed at 9:30,  
2 that that cell was empty? If this guy is your  
3 number one priority.

4 MR. [REDACTED]: Because I was looking for  
5 Epstein. Yeah, I was just, like, my mind, and  
6 on that specific cell, it was him.

7 MR. [REDACTED]: Right.

8 MR. [REDACTED]: And I knew he was at a legal  
9 visit.

10 MR. [REDACTED]: Yeah, yeah. So, and I  
11 get it, that you said you did a round on  
12 Epstein when he came back. But if rounds are  
13 being conducted in entire SHU --

14 MR. [REDACTED]: Mm-hmm.

15 MR. [REDACTED]: -- wouldn't people  
16 notice, hey, it's claiming that one, two,  
17 three, four, you know, however many there are  
18 there, throughout the day, you're going down  
19 everything, how did someone not notice that  
20 cell was empty?

21 MR. [REDACTED]: Hmm. And you're absolutely  
22 right. Now -.

23 MR. [REDACTED]: So, the point being is,  
24 does that mean that these rounds weren't  
25 conducted?

1 MR. [REDACTED]: I'm not going to say that  
 2 because I know those people went down, down  
 3 range, you know, but what I'm going to say is,  
 4 like, if that dude was gone, and you know, the  
 5 number one priority is Epstein, and you're just  
 6 doing rounds because you know that you're going  
 7 to have to count anyway.  
 8 MR. [REDACTED]: Yeah, yeah.  
 9 MR. [REDACTED]: You know what I'm saying? So,  
 10 when you go through on the count, that's when  
 11 you will catch that.  
 12 MR. [REDACTED]: So, yeah. In this case,  
 13 the 4:00 p.m. --  
 14 MR. [REDACTED]: Exactly.  
 15 MR. [REDACTED]: -- count wasn't  
 16 conducted?  
 17 MR. [REDACTED]: Exactly.  
 18 MR. [REDACTED]: So, the 4:00 p.m. count  
 19 wasn't conducted. And then --  
 20 MR. [REDACTED]: Yeah.  
 21 MR. [REDACTED]: -- you have reason to  
 22 believe the 10:00 p.m. count wasn't conducted,  
 23 either. Nor the 12:00 p.m. Nor the 3:00 a.m.  
 24 And not the 5:00 a.m. So, none of those counts  
 25 were conducted.

1 notified someone?  
 2 MR. [REDACTED]: Yes.  
 3 MR. [REDACTED]: And you do believe you  
 4 told both [REDACTED] and [REDACTED]?  
 5 MR. [REDACTED]: Yeah. Yes.  
 6 MR. [REDACTED]: Yes. And are you  
 7 confident of both those things? Can you state  
 8 under penalty and perjury of law, I told  
 9 [REDACTED] and [REDACTED], he did not have a cell mate?  
 10 MR. [REDACTED]: Yes.  
 11 MR. [REDACTED]: What about, are you  
 12 confident under penalty and perjury of law, I  
 13 called the lieutenant's office and notified  
 14 them that Epstein did not have a cell mate?  
 15 MR. [REDACTED]: I'm confident that I called,  
 16 but who was on the other end of that phone --  
 17 MR. [REDACTED]: Right.  
 18 MR. [REDACTED]: -- is my issue.  
 19 MR. [REDACTED]: Right. And what I'm  
 20 saying is, are you confident you called the  
 21 lieutenant's office, though?  
 22 MR. [REDACTED]: No, I can't say I'm confident  
 23 I called the lieutenant, but I want to say yes,  
 24 because that's normally what I would do.  
 25 MR. [REDACTED]: Right. So, who - if you

1 MR. [REDACTED]: I wasn't here for those.  
 2 MR. [REDACTED]: That's a - yeah, I know,  
 3 you left before 10:00 p.m. - so, that's when  
 4 you would believe it would have been caught, is  
 5 during the counts, not the rounds?  
 6 MR. [REDACTED]: I believe it would have been  
 7 caught more so during the counts, and with the  
 8 rounds, you can catch it, but with a million  
 9 things going on, it's a little bit harder.  
 10 MR. [REDACTED]: I gotcha.  
 11 MR. [REDACTED]: You know, [REDACTED] --  
 12 MR. [REDACTED]: So, the counts, the more  
 13 official thing, where there's two inmates where  
 14 you're actually counting inmates. So, the fact  
 15 that the 4:00 p.m. count wasn't conducted,  
 16 that's why you believe you didn't actually  
 17 catch it until 9:30?  
 18 MR. [REDACTED]: Yeah.  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: That's why I believe I didn't  
 21 catch it.  
 22 MR. [REDACTED]: All right. But you did  
 23 catch it at 9:30 --  
 24 MR. [REDACTED]: Yeah. I did catch it.  
 25 MR. [REDACTED]: -- and you do believe you

1 didn't call the lieutenant's office - who would  
 2 it be that you would have called?  
 3 MR. [REDACTED]: It might have been a unit  
 4 manager, or somebody. If anybody was still in  
 5 the building at the time. But I called  
 6 somebody. I spoke to someone, higher than me,  
 7 that could make a decision about this  
 8 situation.  
 9 MR. [REDACTED]: All right. So, that was  
 10 going to be my next question. Are you sure,  
 11 not only did you call, but you actually spoke  
 12 with someone?  
 13 MR. [REDACTED]: Yes. I spoke with someone.  
 14 Who it was, at this point, I don't remember.  
 15 MR. [REDACTED]: Okay. So, someone. You  
 16 did make that notification, and you're saying  
 17 someone else (Indiscernible \*01:20:44).  
 18 MR. [REDACTED]: I made that notification, yes.  
 19 MR. [REDACTED]: And you did - and you're  
 20 positive you informed [REDACTED] and [REDACTED]?  
 21 MR. [REDACTED]: Yeah. Because we were all  
 22 talking. Like, it was, like, yeah. This dude  
 23 is (Indiscernible \*01:20:54). Like, it was a  
 24 conversation. A brief conversation, but a  
 25 conversation nonetheless.

1 MR. [REDACTED]: And you had the three of  
2 you had it?

3 MR. [REDACTED]: Yeah. Like, it was, like, you  
4 know, I said something, he said something, she  
5 said something. And then, it's back to  
6 business because it doesn't stop just because -  
7 . You've got to kind of figure things out, as  
8 you move. So -.

9 MR. [REDACTED]: Okay. What do you got on  
10 that?

11 MR. [REDACTED]: When we initially asked you  
12 the question about Epstein and his cell mate,  
13 you said that Epstein must have a cell mate.  
14 Right? To that effect. You knew that Epstein  
15 needed a cell mate.

16 MR. [REDACTED]: Hmm, and I knew, and when I  
17 said that, I mean, I knew that he had one  
18 before. I knew he had one before. Because  
19 that's why I was, like, oh, like, where did  
20 this guy go?

21 MR. [REDACTED]: Other than the fact that he  
22 came off psych observation, was there any other  
23 reason why you felt that Epstein needed a cell  
24 mate?

25 MR. [REDACTED]: Personally?

1 MR. [REDACTED]: Only from what I heard. I  
2 don't know.

3 MR. [REDACTED]: Have you heard that, if  
4 Tartaglione attacked Epstein, did he try to  
5 kill him, or did Epstein try to hang himself?

6 MR. [REDACTED]: I heard that Epstein tried to  
7 hang himself and that, you know, he blamed  
8 Tartaglione.

9 MR. [REDACTED]: Okay. Now, you said from  
10 that point onwards, instructions started coming  
11 down. From who?

12 MR. [REDACTED]: The instructions started  
13 coming down from the SHU lieutenant. I know  
14 Lieutenant [REDACTED] would come in. He would -.

15 MR. [REDACTED]: So, who is the SHU  
16 lieutenant?

17 MR. [REDACTED]: Now?

18 MR. [REDACTED]: No, no. At that point.

19 MR. [REDACTED]: At that point in time, I think  
20 it was still Lieutenant [REDACTED].

21 MR. [REDACTED]: Was it [REDACTED]?

22 MR. [REDACTED]: Was it Lieutenant [REDACTED]?

23 MR. [REDACTED]: [REDACTED] was in there, too. Mm-  
24 hmm. [REDACTED] - yeah - [REDACTED] was. I think [REDACTED] was  
25 SHU Lieutenant at that time. In fact, I can

1 MR. [REDACTED]: Did anyone instruct you? Any  
2 instructions come down?

3 MR. [REDACTED]: The instructions started  
4 coming down about him needing a cell mate after  
5 his first so-called suicide attempt or  
6 whatever, and that's when they started picking,  
7 and that's when, you know, like, how - well,  
8 what's the other guy's name, Tartaglione? And  
9 that's why we, as officers, can't determine who  
10 we're going to put in there with this guy. You  
11 know, like, because if I -. Like, let's say I  
12 ought to put somebody else in there with him or  
13 whatever, and because Epstein is saying that  
14 Tartaglione attacked him, and this, and that,  
15 and the third. That would fall on me. You  
16 know, you want a supervisor to make that  
17 determination.

18 MR. [REDACTED]: So, let's talk about --

19 MR. [REDACTED]: So -.

20 MR. [REDACTED]: -- that. Were you there for  
21 that incident, when that happened, the first  
22 attempt of suicide?

23 MR. [REDACTED]: I wasn't there for that, no.

24 MR. [REDACTED]: Do you know what happened  
25 between Epstein and Tartaglione?

1 find out right now.

2 MR. [REDACTED]: He was not working on -?

3 MR. [REDACTED]: He was not working that night,  
4 though.

5 MR. [REDACTED]: No. He was off that day?

6 MR. [REDACTED]: Mm-hmm. Yeah. Let's see. So  
7 -.

8 MR. [REDACTED]: So, it came from Lieutenant  
9 [REDACTED]. You think it came from Lieutenant [REDACTED],  
10 also?

11 MR. [REDACTED]: Yeah. Because I, like, I  
12 didn't speak to [REDACTED] recently during that  
13 timeframe, I don't believe. I think, like,  
14 because I think it was, like, I know one time  
15 ,specifically, Lieutenant [REDACTED] was, like, by -  
16 he specifically said - boss's do, not that  
17 night, though. But, you know, he specifically,  
18 like, that's one of the first people that was,  
19 like, was adamant about keep an eye on this  
20 guy. This is why we put him in this cell.

21 MR. [REDACTED]: Well, what about the cell  
22 mate requirement?

23 MR. [REDACTED]: The cell mate requirement  
24 thing. That was something that it was  
25 conversations amongst other SHU crew members

1 from day, evening, morning shift, or whatever.  
 2 Like --  
 3 MR. [REDACTED]: Yeah.  
 4 MR. [REDACTED]: -- we knew we couldn't just  
 5 make a decision. So, that was a thing, like,  
 6 everybody was, like, yo, call the lieutenants,  
 7 like, make --  
 8 MR. [REDACTED]: Mm-hmm.  
 9 MR. [REDACTED]: -- like, have them tell you  
 10 who to put in there with this person.  
 11 MR. [REDACTED]: When was this conversation?  
 12 MR. [REDACTED]: This is over the course of  
 13 time. You know, a couple days. Because we,  
 14 like, people get - people leave this  
 15 institution, and people come back in. So,  
 16 usually, you never really know. So, this is,  
 17 like, you know, days leading, you know, days  
 18 leading up to this or whatever. We just, like,  
 19 idle conversations, that, amongst staff, that  
 20 we have had.  
 21 MR. [REDACTED]: That Epstein needed a  
 22 cellmate at all times.  
 23 MR. [REDACTED]: Yeah. And then, like, you  
 24 know, like, because I believe, at one point in  
 25 time, he had a cell mate, somebody left, and

1 MR. [REDACTED]: But he was no longer in the  
 2 SHU, at that point?  
 3 MR. [REDACTED]: But yeah, after I relieved  
 4 him, I think he -. I don't know if he went  
 5 home, or if he went somewhere else. I don't  
 6 know.  
 7 MR. [REDACTED]: Okay. Does that sound right?  
 8 MR. [REDACTED]: Yeah. So, what you want  
 9 to say is, this --  
 10 MR. [REDACTED]: Last page.  
 11 MR. [REDACTED]: -- so, this --  
 12 MR. [REDACTED]: Last page.  
 13 MR. [REDACTED]: No, no. Not that one. It's  
 14 the other one. Not this one. I need the other  
 15 one.  
 16 MR. [REDACTED]: Yeah. The email.  
 17 MR. [REDACTED]: The email.  
 18 MR. [REDACTED]: So, this email from  
 19 [REDACTED] to [REDACTED], who was the ops lieutenant  
 20 at the time, was sent at 6:07 p.m., where he  
 21 wrote this - you wrote that, the shot, where  
 22 everyone would call it the --  
 23 MR. [REDACTED]: So, look at the date on top.  
 24 At the time.  
 25 MR. [REDACTED]: -- so, it appears that

1 then, they -. We had to find a cell mate for  
 2 him real quick. But like I said, like, this is  
 3 - it's bits and pieces here.  
 4 MR. [REDACTED]: Which SHU staff do you recall  
 5 having that conversation with?  
 6 MR. [REDACTED]: Pfft. Usually, those are the  
 7 little quick conversations you have during  
 8 shift change. So, this is, like, hi, bye,  
 9 blah, blah, blah, blah, blah.  
 10 MR. [REDACTED]: But you don't recall if it  
 11 happened?  
 12 MR. [REDACTED]: Yeah. I don't recall it.  
 13 MR. [REDACTED]: I have a question. That  
 14 [REDACTED] memo. So, you said you've relieved  
 15 [REDACTED]. Do you recall relieving [REDACTED] at  
 16 what time?  
 17 MR. [REDACTED]: (Indiscernible  
 18 \*01:24:59).  
 19 MR. [REDACTED]: Hmm. 2:00. Yeah.  
 20 MR. [REDACTED]: At 2:00?  
 21 MR. [REDACTED]: Yeah. 2:00. Maybe a little -  
 22 .  
 23 MR. [REDACTED]: Do you recall if he left the  
 24 institution?  
 25 MR. [REDACTED]: I don't know.

1 [REDACTED] was still in the institution at 6:00  
 2 p.m. We're trying to figure out why. What  
 3 would he have been doing in there? Would he -?  
 4 MR. [REDACTED]: I don't know.  
 5 MR. [REDACTED]: No? And he's not listed  
 6 on that daily roster. Correct? It's signed  
 7 from -.  
 8 MR. [REDACTED]: That's the 10th. Look at the  
 9 9th.  
 10 MR. [REDACTED]: After he left. Can you  
 11 find his name on there?  
 12 MR. [REDACTED]: It's -.  
 13 MR. [REDACTED]: What's the schedule show him  
 14 leaving at?  
 15 MR. [REDACTED]: 2:00. We saw him leaving at  
 16 2:00 because I'm his relief.  
 17 MR. [REDACTED]: And you know he was not  
 18 in the SHU. Correct?  
 19 MR. [REDACTED]: Right.  
 20 MR. [REDACTED]: Do you guys have access to  
 21 BOP -?  
 22 MR. [REDACTED]: Let him look first.  
 23 MR. [REDACTED]: Okay.  
 24 MR. [REDACTED]: I don't know. And what was  
 25 your question again?

1 MR. [REDACTED]: Do you have access to BOP  
 2 email outside of work?  
 3 MR. [REDACTED]: No.  
 4 MR. [REDACTED]: The only way to send an email  
 5 is from where?  
 6 MR. [REDACTED]: I could send an email to a BOP  
 7 address.  
 8 MR. [REDACTED]: No, no. From your BOP email  
 9 to another BOP. Like, let's say he was sending  
 10 an email to [REDACTED], right? Could he have done  
 11 it from outside the institution? Or does he  
 12 have to be inside the MCC to get that?  
 13 MR. [REDACTED]: Like, say it one more time.  
 14 MR. [REDACTED]: So, in order for him to send  
 15 this email --  
 16 MR. [REDACTED]: Yes, in order for [REDACTED] to  
 17 send an email to --  
 18 MR. [REDACTED]: This email.  
 19 MR. [REDACTED]: -- [REDACTED].  
 20 MR. [REDACTED]: This email.  
 21 MR. [REDACTED]: Mm-hmm.  
 22 MR. [REDACTED]: In order for him to send this  
 23 email, can he do it outside of the MCC, or does  
 24 he have to be inside the MCC to send it?  
 25 MR. [REDACTED]: Oh, no. You can send an email

1 MR. [REDACTED]: Yes. Anything we showed you.  
 2 MR. [REDACTED]: Okay.  
 3 MR. [REDACTED]: Just down there.  
 4 MR. [REDACTED]: What is this one?  
 5 MR. [REDACTED]: This is the one --.  
 6 MR. [REDACTED]: Okay.  
 7 MR. [REDACTED]: Schedule report. That's the  
 8 one that shows that inmate Reyes, he had left.  
 9 MR. [REDACTED]: Gotcha.  
 10 MR. [REDACTED]: And you'll notice, he was  
 11 transferred within, and he went from MCC --  
 12 MR. [REDACTED]: To GEO.  
 13 MR. [REDACTED]: -- to GEO.  
 14 MR. [REDACTED]: Thank you, sir.  
 15 MR. [REDACTED]: And we probably covered this,  
 16 but just want to ask one more time. If that  
 17 4:00 p.m. count was done, would it have been  
 18 caught that Reyes was not in the institution,  
 19 and Epstein needed a cell mate?  
 20 MR. [REDACTED]: There would have --. It would  
 21 have been caught that, you know, that he wasn't  
 22 in the institution, but, like, when you count,  
 23 even though you're looking at living, breathing  
 24 bodies, you know, sometimes you'll be, like, I  
 25 don't remember everybody's name. Sometimes I'm

1 to a BOP email, outside of the MCC.  
 2 MR. [REDACTED]: But what he's saying is,  
 3 would he have access to his BOP email outside  
 4 of the MCC? Would he have been able to send it  
 5 --  
 6 MR. [REDACTED]: Oh, would --  
 7 MR. [REDACTED]: -- yeah.  
 8 MR. [REDACTED]: -- would [REDACTED] has access  
 9 to --. Oh. Not to my knowledge. I don't know  
 10 how to do that.  
 11 MR. [REDACTED]: Okay. Yeah, no. And we  
 12 already know that.  
 13 MR. [REDACTED]: And you didn't see him all  
 14 day? After he had left.  
 15 MR. [REDACTED]: Hmm-mm.  
 16 MR. [REDACTED]: And you relieved him. You  
 17 didn't see him in the SHU?  
 18 MR. [REDACTED]: No.  
 19 MR. [REDACTED]: He never came back?  
 20 MR. [REDACTED]: Hmm-mm.  
 21 MR. [REDACTED]: Okay. So, we have all these  
 22 documents that we showed you. Just initial  
 23 them, please.  
 24 MR. [REDACTED]: Okay. Hmm. And this. This  
 25 one, too, or no?

1 talking to inmates and I'm, like, hey, you.  
 2 So, I probably wouldn't even notice it was  
 3 Reyes. You know?  
 4 MR. [REDACTED]: But would you --  
 5 MR. [REDACTED]: But if you --.  
 6 MR. [REDACTED]: -- you would have noticed  
 7 that there was no one in the cell, is what  
 8 we're saying.  
 9 MR. [REDACTED]: Right.  
 10 MR. [REDACTED]: Now, we asked you about, have  
 11 you ever pre-filled --  
 12 MR. [REDACTED]: Mm-hmm.  
 13 MR. [REDACTED]: -- round sheets --  
 14 MR. [REDACTED]: Mm-hmm.  
 15 MR. [REDACTED]: -- or count sheets. You said  
 16 yes to the count sheets. Right?  
 17 MR. [REDACTED]: Mm-hmm.  
 18 MR. [REDACTED]: Do you recall ever pre-  
 19 filling round sheets at all?  
 20 MR. [REDACTED]: I don't recall pre-filling  
 21 round sheets. I remember being taught about  
 22 it, at one point in time.  
 23 MR. [REDACTED]: Taught about it by who?  
 24 MR. [REDACTED]: That was when I was a daisy  
 25 fresh rookie.

1 MR. [REDACTED]: Okay.  
 2 MR. [REDACTED]: So, I knew that that was  
 3 something that was done.  
 4 MR. [REDACTED]: The pre-filling?  
 5 MR. [REDACTED]: Yeah.  
 6 MR. [REDACTED]: By who?  
 7 MR. [REDACTED]: I want to say it was [REDACTED],  
 8 but I was a rookie back then. I was --  
 9 MR. [REDACTED]: By who?  
 10 MR. [REDACTED]: -- (Indiscernible \*01:30:15),  
 11 though. [REDACTED], but that was -. I was a rookie  
 12 by then.  
 13 MR. [REDACTED]: Who is [REDACTED]?  
 14 MR. [REDACTED]: He don't work here no more.  
 15 MR. [REDACTED]: Do you recall his first name?  
 16 MR. [REDACTED]: No.  
 17 MR. [REDACTED]: Okay. Do you recall hearing  
 18 or seeing anybody else pre-fill round sheets or  
 19 count sheets?  
 20 MR. [REDACTED]: Yeah. You hear about it, but  
 21 -.  
 22 MR. [REDACTED]: Like, who?  
 23 MR. [REDACTED]: You know what I'm saying,  
 24 like, I've heard about it from multiple people.  
 25 Names and dates of when they did it. Like, I

1 mentioned the SHU crew. So, the names. What  
 2 are the names?  
 3 MR. [REDACTED]: From all these -. From back  
 4 then or whatever, it was a whole slew of  
 5 people.  
 6 MR. [REDACTED]: Which is fine. Any names you  
 7 recall. Because you said you learned it from  
 8 people, right?  
 9 MR. [REDACTED]: Yeah.  
 10 MR. [REDACTED]: And so -.  
 11 MR. [REDACTED]: So, like, as me learning,  
 12 like, well, now, I know when I started,  
 13 [REDACTED] was up there. [REDACTED] (Phonetic Sp.  
 14 \*01:31:49). was up there.  
 15 MR. [REDACTED]: [REDACTED]?  
 16 MR. [REDACTED]: [REDACTED] Oh. How do you  
 17 spell that?  
 18 MR. [REDACTED]: He doesn't work here no more.  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: Who else used to work up  
 21 there? Some dude that used to work here, named  
 22 [REDACTED] used to work up there. It's a bunch of  
 23 people.  
 24 MR. [REDACTED]: So, you've got --  
 25 MR. [REDACTED]: Track of all these names.

1 don't know.  
 2 MR. [REDACTED]: I don't need - who have you  
 3 heard about? - I don't need dates or anything,  
 4 but who have you heard about pre-filling the  
 5 rounds and counts sheets?  
 6 MR. [REDACTED]: You know, some of the old  
 7 school staff, like, you know, like, when, like,  
 8 but these people don't even work here anymore.  
 9 You know, like, I mean, I don't know these  
 10 people. They don't work here anymore. They,  
 11 you know, like, they had a whole SHU crew.  
 12 Like, there was a whole system of things that -  
 13 they had it on lock. That was just how it  
 14 worked.  
 15 MR. [REDACTED]: So, you said SHU --  
 16 MR. [REDACTED]: So, I remember, as a rookie, I  
 17 would go in there. And then, you know, they  
 18 teach you things or whatever, and then, you  
 19 know, like, I guess they've been working so  
 20 long, you know, they know the short cuts that  
 21 they do. So, I remember learning about it then  
 22 or whatever. And then, I even got taught at  
 23 one point, or whatever. I'm, like, okay. But  
 24 I wasn't working up there then.  
 25 MR. [REDACTED]: So, the names. I know you

1 MR. [REDACTED]: -- [REDACTED], [REDACTED] and  
 2 [REDACTED]  
 3 MR. [REDACTED]: Yeah.  
 4 MR. [REDACTED]: Have you seen them pre-fill -  
 5 have you heard or seen them - pre-fill round  
 6 sheets or count sheets?  
 7 MR. [REDACTED]: I've heard of it. But, you  
 8 know, like, I haven't seen them do it, but I've  
 9 heard of it or whatever. And I do remember who  
 10 it was, though. I remember, at one point in  
 11 time, somebody showed me, like, oh, yeah, this  
 12 is how you -. Teaching me how to do the round  
 13 sheets. And taught me that way.  
 14 MR. [REDACTED]: What did they teach you  
 15 exactly?  
 16 MR. [REDACTED]: Like, I start here. So, the  
 17 time is 4:05. And you start at 4:05, finish at  
 18 4:06. The next one, you do at 4:07, 4:08.  
 19 MR. [REDACTED]: So, that's why you, when you  
 20 saw that -.  
 21 MR. [REDACTED]: That's when I saw that, and I  
 22 recognized it.  
 23 MR. [REDACTED]: So, you think that's --  
 24 MR. [REDACTED]: That's -.  
 25 MR. [REDACTED]: -- that's how it was taught

1 for --  
 2 MR. [REDACTED]: Mm-hmm.  
 3 MR. [REDACTED]: -- how many round sheets have  
 4 you done? (Indiscernible \*01:32:58) that it was  
 5 pre-filled?  
 6 MR. [REDACTED]: Pre-filled?  
 7 MR. [REDACTED]: Yeah.  
 8 MR. [REDACTED]: I don't recall doing any pre-  
 9 filled round sheets on my career. Because it  
 10 was a situation -. Well, that's another story,  
 11 so I'm not even going to get into that.  
 12 MR. [REDACTED]: Okay.  
 13 MR. [REDACTED]: Yeah, but -.  
 14 MR. [REDACTED]: You've never, on the round  
 15 sheets.  
 16 MR. [REDACTED]: Hmm-mm.  
 17 MR. [REDACTED]: How many count sheets have  
 18 you?  
 19 MR. [REDACTED]: Now, the count sheets, on the  
 20 other hand, if, you know, you're in a hurry,  
 21 you fill it out --  
 22 MR. [REDACTED]: Mm-hmm.  
 23 MR. [REDACTED]: -- you execute it. And then,  
 24 you put it out. Because you're just, like, you  
 25 don't want to waste time just doing paperwork.

1 MR. [REDACTED]: No. But they were all -. I  
 2 do recall an incident where, I guess there was  
 3 a bad count. No. There was two good counts.  
 4 It was two good counts, and then, they figured  
 5 out it was a bad count the next shift or  
 6 whatever. So, basically, what people were  
 7 doing, they would look in on the computer to  
 8 see what the number was, fill out the paper,  
 9 and send it down. I remember that happening a  
 10 while back.  
 11 MR. [REDACTED]: They looked on the computer  
 12 for the number?  
 13 MR. [REDACTED]: Yeah.  
 14 MR. [REDACTED]: How do you look --  
 15 MR. [REDACTED]: Like --  
 16 MR. [REDACTED]: -- on the computer?  
 17 MR. [REDACTED]: -- they, I guess, like, you  
 18 know, somebody must have had work control, and  
 19 had E1 access, and just looked up the number --  
 20 MR. [REDACTED]: Mm-hmm.  
 21 MR. [REDACTED]: -- of what control would have  
 22 on the E1, then filled it out, and then said,  
 23 here you go. And turned it in. And that went  
 24 on for some time or whatever. So -.  
 25 MR. [REDACTED]: When was this?

1 But obviously, I learned a valuable lesson from  
 2 that one.  
 3 MR. [REDACTED]: So, I know on that one, that  
 4 a count wasn't actually done. Have there been  
 5 any other situations --  
 6 MR. [REDACTED]: No.  
 7 MR. [REDACTED]: -- where the counts haven't  
 8 been done?  
 9 MR. [REDACTED]: No.  
 10 MR. [REDACTED]: Do you know of any employees  
 11 that haven't been doing rounds or counts?  
 12 MR. [REDACTED]: In SHU or just in the prison  
 13 in general?  
 14 MR. [REDACTED]: Just in general.  
 15 MR. [REDACTED]: Yeah.  
 16 MR. [REDACTED]: The SHU is what we  
 17 concentrated --  
 18 MR. [REDACTED]: Yeah.  
 19 MR. [REDACTED]: -- but if you know in  
 20 general.  
 21 MR. [REDACTED]: Nah, and - pfft - and  
 22 especially after all of this.  
 23 MR. [REDACTED]: No. Let's talk about -  
 24 starting at that time, too - were you aware of  
 25 employees not doing rounds and counts?

1 MR. [REDACTED]: I don't even remember when it  
 2 is. But I remember that was -. I remember  
 3 that was a thing because it was, like, some  
 4 people were supposed to get in trouble for  
 5 that.  
 6 MR. [REDACTED]: Do you recall if [REDACTED],  
 7 [REDACTED], or any of the SHU staff had access to the  
 8 E1? Even yourself. Did you guys have access to  
 9 the E1 document?  
 10 MR. [REDACTED]: No. I didn't have access to  
 11 the E1 at that time. No.  
 12 MR. [REDACTED]: What about the rest of the  
 13 staff?  
 14 MR. [REDACTED]: I don't think so.  
 15 MR. [REDACTED]: How would they have the  
 16 count?  
 17 MR. [REDACTED]: He already said.  
 18 MR. [REDACTED]: No, he did, but I'm going to  
 19 ask about the 10:00 p.m. and the midnight. How  
 20 would they know to go off the -? I know you  
 21 went off the master sheet, right?  
 22 MR. [REDACTED]: Mm-hmm.  
 23 MR. [REDACTED]: What sheet -? What number -?  
 24 Where would they have got the number two? Not  
 25 for a 10:00 p.m. and a midnight.

1 MR. [REDACTED]: With that --  
 2 MR. [REDACTED]: (Indiscernible \*01:35:18).  
 3 MR. [REDACTED]: -- yeah, what would have  
 4 happened with that is, is you just, like, when,  
 5 like, I'm leaving at 10:00. So, I'm leaving at  
 6 10:00. And they were there for the 4:00 count.  
 7 So, they already know numbers.  
 8 MR. [REDACTED]: From the 4:00?  
 9 MR. [REDACTED]: They already know the numbers.  
 10 MR. [REDACTED]: So, they're going based  
 11 upon the 4:00 count (Indiscernible \*01:35:37) -  
 12 -  
 13 MR. [REDACTED]: Right.  
 14 MR. [REDACTED]: -- and if anybody left,  
 15 they would just subtract them from that number  
 16 --  
 17 MR. [REDACTED]: Right.  
 18 MR. [REDACTED]: -- that you used?  
 19 MR. [REDACTED]: Mm-hmm.  
 20 MR. [REDACTED]: Because they know that  
 21 the 4:00 p.m. count --  
 22 MR. [REDACTED]: Yeah. So, like --  
 23 MR. [REDACTED]: -- (Indiscernible  
 24 \*01:35:44).  
 25 MR. [REDACTED]: -- put, like, this -. All

1 MR. [REDACTED]: -- as their base count,  
 2 and at the 10:00 p.m., anything that changed,  
 3 because [REDACTED] was --  
 4 MR. [REDACTED]: Mm-hmm.  
 5 MR. [REDACTED]: -- you know, constant.  
 6 She was there the whole time.  
 7 MR. [REDACTED]: Yes.  
 8 MR. [REDACTED]: Okay.  
 9 MR. [REDACTED]: Have you ever slept on the  
 10 job while you was --  
 11 MR. [REDACTED]: Not intentionally.  
 12 MR. [REDACTED]: -- while you're sitting on  
 13 the computer.  
 14 MR. [REDACTED]: Like, you know, you sitting on  
 15 the computer, you might.  
 16 MR. [REDACTED]: Dose off.  
 17 MR. [REDACTED]: A box of sandman. Especially  
 18 if you're doing 16 hours on the regular basis.  
 19 MR. [REDACTED]: Did you sleep on August 9th -  
 20 -  
 21 MR. [REDACTED]: No.  
 22 MR. [REDACTED]: -- when you were working?  
 23 MR. [REDACTED]: No.  
 24 MR. [REDACTED]: Have you heard of a SHU -  
 25 let's just talk about SHU employees whenever

1 right. So, let's just say for the sake of  
 2 argument, if 9:30, right? It's 9:30, lock the  
 3 institution down, you count, you take a count  
 4 at 10:00. You count at 10:00, and at this  
 5 point in time, you know, 12:00, you're off or  
 6 whatever. So, midnight comes around, your  
 7 relief comes in, or whatever the case. But in  
 8 this particular case, the only person that went  
 9 home was [REDACTED]. Because [REDACTED] was still  
 10 here. So, if [REDACTED] was coming in, or  
 11 whatever, yo, [REDACTED] was here the whole time.  
 12 She knows all the numbers.  
 13 MR. [REDACTED]: Right.  
 14 MR. [REDACTED]: He ain't got to do nothing.  
 15 MR. [REDACTED]: So, she know that the  
 16 4:00 count cleared, the number that you called  
 17 in was good at the time --  
 18 MR. [REDACTED]: Mm-hmm.  
 19 MR. [REDACTED]: -- or at least they said  
 20 it was good.  
 21 MR. [REDACTED]: And nobody else left, or came  
 22 in, and this -.  
 23 MR. [REDACTED]: So, they could just use  
 24 that number --  
 25 MR. [REDACTED]: Mm-hmm.

1 you were working - have you heard about SHU  
 2 employees sleeping on the job?  
 3 MR. [REDACTED]: Rumors, but I never observed  
 4 it.  
 5 MR. [REDACTED]: Okay. When you were those  
 6 three of you guys in there, did you observe  
 7 [REDACTED] or [REDACTED] sleeping --  
 8 MR. [REDACTED]: No.  
 9 MR. [REDACTED]: -- during the shift on August  
 10 9th?  
 11 MR. [REDACTED]: No. I don't know how they  
 12 would because we was running the whole time.  
 13 MR. [REDACTED]: There's going to be a lot  
 14 of unnecessary stuff in there, but if you want  
 15 to ask those.  
 16 MR. [REDACTED]: Okay. Well, how do you  
 17 answer some of these questions, you said last  
 18 time you interacted with Epstein, something  
 19 triggered in your mind, right? And so, that's  
 20 why you told [REDACTED] and [REDACTED] --  
 21 MR. [REDACTED]: Yeah.  
 22 MR. [REDACTED]: -- to keep an eye on him.  
 23 Okay. Do you know if there was any threats  
 24 made to Epstein?  
 25 MR. [REDACTED]: No.

1 MR. [REDACTED]: Did you know why Epstein was  
2 in prison?  
3 MR. [REDACTED]: Well, yeah. I watch the news.  
4 MR. [REDACTED]: Okay. Did you have any  
5 feelings regarding why he was in prison?  
6 MR. [REDACTED]: No.  
7 MR. [REDACTED]: Did Epstein have -. Go  
8 ahead. You were going to say something.  
9 MR. [REDACTED]: Like, feelings, what you did  
10 is what you did. My personal feelings don't  
11 matter. It's a job. You know what I'm saying?  
12 So, like, I do my best for something like that.  
13 That's why I don't personally like to read  
14 people's paperwork. Because once you know, you  
15 can't un-know it.  
16 MR. [REDACTED]: Mm-hmm.  
17 MR. [REDACTED]: So, but nah, I didn't have any  
18 feelings towards him or whatever. I'm, like,  
19 okay, he needs to go here, he needs to go -.  
20 All right. There you go. There you go.  
21 MR. [REDACTED]: What is your understanding of  
22 what happened to Epstein on August 9th and 10th  
23 of 2019?  
24 MR. [REDACTED]: My understanding of it was  
25 that --

1 MR. [REDACTED]: I would assume so. I wasn't  
2 there. I didn't see anything, but -.  
3 MR. [REDACTED]: Did you have any involvement  
4 with Epstein's death?  
5 MR. [REDACTED]: No.  
6 MR. [REDACTED]: What would have prevented  
7 Epstein's death? What actions could have been  
8 taken to prevent his death?  
9 MR. [REDACTED]: I mean, personally, I feel  
10 that if a person wants to take their own life,  
11 they're going to do it. You know? So, I do not  
12 know.  
13 MR. [REDACTED]: Do you think them actually,  
14 if the C.O.s actually did the rounds and the  
15 counts, it could have helped?  
16 MR. [REDACTED]: I think it could have been a  
17 deterrent, but the truth of the matter is, if  
18 somebody is actually attempting to do that,  
19 they're going to do it. That's not going to  
20 stop. And the only reason I say that is  
21 because of my mother's (Indiscernible  
22 \*01:40:12). If you want to do it, you're going  
23 to do it.  
24 MR. [REDACTED]: What about in a cell? In  
25 a cell, though, if he actually had a cell mate

1 MR. [REDACTED]: What is your understanding of  
2 what happened to him?  
3 MR. [REDACTED]: -- that he hung himself. He  
4 hung himself in the cell.  
5 MR. [REDACTED]: What is your - you said he  
6 hung himself?  
7 MR. [REDACTED]: Yeah. That's my understanding  
8 of what happened.  
9 MR. [REDACTED]: Do you have any information  
10 with regard to any suspicious activity that  
11 occurred on August 9th and 10th, 2019, leading  
12 up to the discovery of Epstein in his cell?  
13 MR. [REDACTED]: No.  
14 MR. [REDACTED]: What do you know about  
15 someone else taking Epstein's life?  
16 MR. [REDACTED]: Nothing.  
17 MR. [REDACTED]: What do you know about  
18 other's assisting in taking Epstein's life?  
19 MR. [REDACTED]: Nothing.  
20 MR. [REDACTED]: Did Epstein take his own  
21 life?  
22 MR. [REDACTED]: I wasn't there, but I would  
23 assume so.  
24 MR. [REDACTED]: Did Epstein act alone in  
25 taking his own life?

1 in there. Do you think that that would have  
2 potentially helped to actually somebody else in  
3 there?  
4 MR. [REDACTED]: Yes and no. I think it might  
5 have deterred him for a bit, but, you know?  
6 MR. [REDACTED]: He would have found a  
7 way?  
8 MR. [REDACTED]: He would have found a way. If  
9 that's really what you wanted to do, you would  
10 have found a way. But that's an opinion.  
11 MR. [REDACTED]: At least in this specific  
12 circumstance, you think that, between the  
13 counts and the rounds, and then getting an  
14 actual cell mate in there for him, because he  
15 was required to have a cell mate, do you think  
16 that those things would have at least helped?  
17 MR. [REDACTED]: I think it would have helped.  
18 Yes.  
19 MR. [REDACTED]: What is some of the  
20 systematic problems inside the MCC - and  
21 specifically, the SHU - that allowed for  
22 Epstein to die?  
23 MR. [REDACTED]: A lack of staff. Overworked  
24 staff. Not getting clear instructions on what  
25 to do in certain instances; i.e., you know, he

1 doesn't have a cell mate, but there was no  
2 directive of who to put in there. Like I said,  
3 if you have an odd number, you don't have a  
4 body to put there.

5 MR. [REDACTED]: Hmm.

6 MR. [REDACTED]: You can't just take an inmate  
7 from another house that didn't do anything,  
8 just because you trust him, and put him in  
9 there.

10 MR. [REDACTED]: So, you're saying there  
11 should have been a backup inmate?

12 MR. [REDACTED]: There should have been a  
13 backup plan for that. You know, and it was -.  
14 To me, it was decisions made, on the part of  
15 the institution, that were wrong. And because  
16 they made these decisions, now those other two  
17 officers have to pay for it. You know,  
18 Epstein, as high-profile as he is, should not  
19 have been in SHU. He should have been in Ten  
20 South.

21 MR. [REDACTED]: Why do you say that?

22 MR. [REDACTED]: That's not a decision that we  
23 get to make. Because he's too high a profile.  
24 Look, after that thing hit the news, the world  
25 knew who he was. The world knew who El Chapo

1 attorney visits had anything to do with the  
2 fact that he wasn't placed in Ten South?

3 MR. [REDACTED]: I definitely think that's a  
4 possibility. You hear lawyer, and they jump,  
5 too.

6 MR. [REDACTED]: Right.

7 MR. [REDACTED]: Perfect example is - and this  
8 is more so the systemic problems that are here  
9 - if an inmate says, I want to talk to my  
10 family, I want to -. For whatever reason, you  
11 know, and they get a call from the judge, the  
12 lawyer, anything of the sort. They're going  
13 to, oh, you've got to give this inmate a phone  
14 call, even though this inmate just had his  
15 required phone call, and it's not time for that  
16 phone call again. As soon as you hear lawyer  
17 or judge or whatever, they're going to tell you  
18 to do that.

19 MR. [REDACTED]: Sure.

20 MR. [REDACTED]: Even though he's supposed to  
21 wait his time. You know, so, but that's how -.  
22 I hope that answers your question.

23 MR. [REDACTED]: Yeah.

24 MR. [REDACTED]: Fair enough. That's enough.

25 MR. [REDACTED]: Just back to the call

1 was. El Chapo never touched a unit. He went  
2 straight to Ten South. Why would you put  
3 somebody that high-profile, you know, that  
4 close to regular, every day inmates.

5 MR. [REDACTED]: Now, if people are in Ten  
6 South, can they have attorney visits?

7 MR. [REDACTED]: Yes.

8 MR. [REDACTED]: So, they can still do  
9 that attorney visit all day long --

10 MR. [REDACTED]: But they don't --

11 MR. [REDACTED]: -- if -.

12 MR. [REDACTED]: -- they could. But in Ten  
13 South, the attorney goes up to Ten South.

14 There is a room where it's a barrier between -  
15 they can talk to each other, but it's a glass  
16 and stuff in there, anything that needs to get  
17 handed, you know, search it, and then, you pass  
18 it over. You could obviously can't read  
19 anybody's legal work, but you make sure that  
20 there's no contraband in there, when it has -.  
21 And there's another room in there with a slot  
22 that they can, that the lawyer could do that,  
23 but the lawyer has to show it to you first, and  
24 then hand it to the inmate.

25 MR. [REDACTED]: Do you think that the

1 that you said that you made some time between  
2 9:30 and 10:00. Would it have potentially been  
3 to the control center?

4 MR. [REDACTED]: I guess it's possible. It was  
5 definitely possible. Because if anything or  
6 whatever, like, because that is one of the  
7 places that we call, control, the lieutenant's  
8 office, the unit team, and, you know, sometimes  
9 you might make a phone call, like, oh, no, this  
10 person ain't here, try this person, try control  
11 center. So, it's definitely possible.

12 MR. [REDACTED]: So, looking at the 9th,  
13 that roster, who would have been on between  
14 9:30 and 10:00 --

15 MR. [REDACTED]: This is --

16 MR. [REDACTED]: -- in control center --

17 MR. [REDACTED]: -- the 9th.

18 MR. [REDACTED]: -- or the lieutenant's  
19 office? Who could have been some potential  
20 possibilities that you spoke with?

21 MR. [REDACTED]: Hmm. Now, I could have  
22 possibly spoke to [REDACTED] I could have - and  
23 honestly, enough - I could have definitely,  
24 possibly spoke to [REDACTED] or [REDACTED] too.  
25 But yeah. I wouldn't have asked him.

1 MR. [REDACTED]: Okay.  
 2 MR. [REDACTED]: Was there any that you  
 3 said you definitely would have spoken to  
 4 someone higher than you? Are you any of those  
 5 people higher than you?  
 6 MR. [REDACTED]: I mean --  
 7 MR. [REDACTED]: Or were then.  
 8 MR. [REDACTED]: -- well, [REDACTED]  
 9 (Indiscernible \*01:44:52), I'm a seven, they're  
 10 eights.  
 11 MR. [REDACTED]: Okay.  
 12 MR. [REDACTED]: You know, and they've been in  
 13 the building for so long, that they --  
 14 MR. [REDACTED]: Sure, sure, sure.  
 15 MR. [REDACTED]: -- they know every nook and  
 16 cranny in here.  
 17 MR. [REDACTED]: Yeah, yeah, yeah.  
 18 MR. [REDACTED]: So, that's, like, that's one  
 19 of the people, like, oh, wait a minute, I don't  
 20 know how to do something. Hey, can you teach  
 21 me how to do this?  
 22 MR. [REDACTED]: Sure.  
 23 MR. [REDACTED]: You know, so, they always gave  
 24 me good information. So, I would have probably  
 25 asked them. [REDACTED] is always giving me good

1 reason, I'm assuming that the reason that I  
 2 don't remember is because I was just moving so  
 3 fast. Like, I'm usually very, very detailed  
 4 and trying to remember things, and --  
 5 MR. [REDACTED]: Sure, sure.  
 6 MR. [REDACTED]: -- you know, but --.  
 7 MR. [REDACTED]: All right. And then, do  
 8 you know anything about, if the 10:00 p.m.  
 9 count was conducted?  
 10 MR. [REDACTED]: That, I don't know.  
 11 MR. [REDACTED]: You just --  
 12 MR. [REDACTED]: That --  
 13 MR. [REDACTED]: -- you were gone.  
 14 MR. [REDACTED]: -- I was gone.  
 15 MR. [REDACTED]: Okay. So, you were  
 16 definitely gone by --  
 17 MR. [REDACTED]: Yeah. I was definitely gone.  
 18 MR. [REDACTED]: -- before the 10:00 p.m.  
 19 count. All right. Do you want to ask  
 20 anything?  
 21 MR. [REDACTED]: No.  
 22 MR. [REDACTED]: Do we have - on the other  
 23 interview sheets, I had, like, the list of  
 24 (Indiscernible \*01:46:33). Some here. Let me  
 25 just look.

1 information when I'm trying to learn something.  
 2 So, I might have asked him.  
 3 MR. [REDACTED]: And so, now - and again,  
 4 thinking back on, like, how, like you're  
 5 saying, this is such a higher profile thing,  
 6 and this was so in the media, and everybody who  
 7 knew who he was after this - thinking back to  
 8 that, and thinking, like, oh, shit, I knew he  
 9 didn't have a cell mate, I know I called  
 10 somebody, that doesn't help jog your memory of  
 11 what was said, or what was done, and the fact  
 12 that you're involved now, specifically, with  
 13 central --  
 14 MR. [REDACTED]: Yeah. And I'm --  
 15 MR. [REDACTED]: -- (Indiscernible  
 16 \*01:45:41).  
 17 MR. [REDACTED]: -- and I'm trying to remember  
 18 exactly who I spoke to. I really am.  
 19 MR. [REDACTED]: Because I mean --  
 20 MR. [REDACTED]: Yeah.  
 21 MR. [REDACTED]: -- wouldn't you have  
 22 thought of that, like, even, like, that day  
 23 after, like, oh, man, good thing I called that  
 24 person and told them?  
 25 MR. [REDACTED]: Yeah. And, like, the only

1 MR. [REDACTED]: Initial. Just initial this  
 2 one, too.  
 3 MR. [REDACTED]: Do you know anything  
 4 about Epstein being prematurely removed from  
 5 suicide watch; and the reasons why, if he was?  
 6 MR. [REDACTED]: Prematurely removed? Factually  
 7 speaking, I don't know if it's premature. I'm  
 8 not psych. Personally speaking, yeah, I think  
 9 it's probably a little fast.  
 10 MR. [REDACTED]: Do you know if anybody  
 11 had any influence on him being removed from  
 12 suicide watch?  
 13 MR. [REDACTED]: That, I don't know.  
 14 MR. [REDACTED]: Okay. So, you don't know  
 15 anything about, like, attorneys, or judges, or  
 16 wardens, or anything --  
 17 MR. [REDACTED]: No.  
 18 MR. [REDACTED]: -- who had contact with  
 19 him?  
 20 MR. [REDACTED]: Yeah. I don't get to be privy  
 21 to that.  
 22 MR. [REDACTED]: Sure. Do you know  
 23 anything about the MCC SHU cameras being  
 24 tampered with or manipulated?  
 25 MR. [REDACTED]: No.

1 MR. [REDACTED]: No. Do you know anything  
 2 about Epstein being in his assigned cell on  
 3 August 10th? Not being in his assigned cell on  
 4 August 10th, 2019?  
 5 MR. [REDACTED]: No. Not being in his assigned  
 6 cell? You mean, that's because the 10th is when he  
 7 was discovered?  
 8 MR. [REDACTED]: Correct.  
 9 MR. [REDACTED]: Hmm. No.  
 10 MR. [REDACTED]: So, you don't -.  
 11 MR. [REDACTED]: Like, so, he was -. Because,  
 12 I mean, like, I worked that day, but I worked  
 13 at 2:00. So -.  
 14 MR. [REDACTED]: Who's in charge of making  
 15 sure that the inmates are in the cells that  
 16 shows within the - I don't know if it was  
 17 Sentry or what system would I be that inmate  
 18 cell assignments are in?  
 19 MR. [REDACTED]: Oh, like, the Sentry. Sentry.  
 20 Yes.  
 21 MR. [REDACTED]: So, whose job is it to  
 22 ensure that --  
 23 MR. [REDACTED]: That the -.  
 24 MR. [REDACTED]: -- Sentry matches what  
 25 cells they're in?

1 particular case, I would assume that a  
 2 lieutenant would have been all over that, and  
 3 they would have made sure it was done properly.  
 4 MR. [REDACTED]: So, in this case, should  
 5 it have been Lieutenant [REDACTED], who was the SHU  
 6 lieutenant?  
 7 MR. [REDACTED]: Yeah.  
 8 MR. [REDACTED]: All right. So, he should  
 9 have been making sure -. So, I mean, it's from  
 10 July 30th all the way to August 10th. He's in  
 11 a cell that doesn't match up with what Sentry  
 12 says.  
 13 MR. [REDACTED]: Yeah. That's not good.  
 14 MR. [REDACTED]: So, who, during that  
 15 period, should have caught that --  
 16 MR. [REDACTED]: That would have been --  
 17 MR. [REDACTED]: -- (Indiscernible  
 18 \*01:49:33)?  
 19 MR. [REDACTED]: -- that would have been the  
 20 SHU lieutenant.  
 21 MR. [REDACTED]: The SHU lieutenant --  
 22 MR. [REDACTED]: Yeah.  
 23 MR. [REDACTED]: -- would have audited  
 24 those reports?  
 25 MR. [REDACTED]: Yeah.

1 MR. [REDACTED]: That's a collective. Really.  
 2 You know, in the SHU, there's supposed to be  
 3 the OIC. And probably with a little help from  
 4 C&A. On a regular housing unit, you get a new  
 5 inmate, hey, C&A, I got this new inmate, here's  
 6 his numbers, and here's the bed assignment, and  
 7 C&A keys it in. In SHU, usually - because it's  
 8 supposed to be four people in there - the SHU  
 9 OIC would key the inmate in, when they arrive.  
 10 MR. [REDACTED]: Okay. So, if after  
 11 they're -. So, if he arrives from suicide  
 12 watch on July 30th, 2019, and he's placed in  
 13 cell A --  
 14 MR. [REDACTED]: Mm-hmm.  
 15 MR. [REDACTED]: -- but for whatever  
 16 reason, a few hours later, it's determined he  
 17 can't be in cell A, he's got to be in cell B,  
 18 and him and his roommate, Reyes, were moved  
 19 over to cell B. Who's responsible for making  
 20 that change?  
 21 MR. [REDACTED]: For making it physically or on  
 22 the computer?  
 23 MR. [REDACTED]: In the computer.  
 24 MR. [REDACTED]: You, like, you, normally, you  
 25 would want it to be the OIC. For this

1 MR. [REDACTED]: To see who is in -. And  
 2 how often is that audited, do you know?  
 3 MR. [REDACTED]: I don't know right off hand.  
 4 MR. [REDACTED]: Okay.  
 5 MR. [REDACTED]: But yeah. SHU lieutenant  
 6 should have caught that one.  
 7 MR. [REDACTED]: And does that --  
 8 MR. [REDACTED]: Yeah.  
 9 MR. [REDACTED]: -- have anything to do  
 10 with the OIC on the different shifts, to say,  
 11 like, all right, are these inmates in their  
 12 appropriate cells, or is Sentry up to date?  
 13 MR. [REDACTED]: We can ask one another these  
 14 questions or whatever, but it's very difficult  
 15 --  
 16 MR. [REDACTED]: Okay.  
 17 MR. [REDACTED]: -- to, you know, do that with  
 18 everything that's going on, because even during  
 19 shift change, nothing stops moving. So, the  
 20 way I was taught is, like, the morning watch  
 21 shift, because things slowed down, is they're  
 22 supposed to go through the paperwork and check  
 23 it, and fix everything.  
 24 MR. [REDACTED]: Okay.  
 25 MR. [REDACTED]: This is the way that I was

1 taught how to do it. You know? So.  
 2 MR. [REDACTED]: Yeah, but ultimately, you  
 3 believe it was the SHU lieutenant that should  
 4 have been responsible?  
 5 MR. [REDACTED]: Yes.  
 6 MR. [REDACTED]: Is that a yes or no?  
 7 MR. [REDACTED]: Yes.  
 8 MR. [REDACTED]: Do you know -. Did we  
 9 ever talk about cell searches?  
 10 MR. [REDACTED]: No.  
 11 MR. [REDACTED]: Do you know if cell  
 12 searches were being conducted in the SHU in  
 13 July and August of 2019?  
 14 MR. [REDACTED]: On my shift, no. On the day  
 15 shift, that's when they're supposed to be  
 16 conducted, because you have more staff, and you  
 17 can pull inmates out and actually execute that.  
 18 On the evening shift, you don't have enough  
 19 staff to do that.  
 20 MR. [REDACTED]: Per policy, in the SHU,  
 21 aren't you supposed to - even at that time - to  
 22 be doing five cell searches per shift?  
 23 MR. [REDACTED]: Yeah. You're supposed to do  
 24 five cell searches per shift, but being that  
 25 they're in the SHU and you can't just pull them

1 MR. [REDACTED]: No.  
 2 MR. [REDACTED]: You didn't even know  
 3 that?  
 4 MR. [REDACTED]: No.  
 5 MR. [REDACTED]: So, they were not being  
 6 conducted then?  
 7 MR. [REDACTED]: No. Not cells.  
 8 MR. [REDACTED]: Yeah.  
 9 MR. [REDACTED]: Because you don't have the  
 10 people --  
 11 MR. [REDACTED]: Sure.  
 12 MR. [REDACTED]: -- to pull these inmates out.  
 13 MR. [REDACTED]: And the morning watch,  
 14 that was the policy, that you just conduct  
 15 searches of the common areas. But during day  
 16 watch, and night watch, you were supposed to be  
 17 doing cell searches.  
 18 MR. [REDACTED]: Easier enough if you have a  
 19 full crew --  
 20 MR. [REDACTED]: Right.  
 21 MR. [REDACTED]: -- but if you don't have a  
 22 full crew, how are you going to execute that?  
 23 MR. [REDACTED]: So, the reason why they  
 24 weren't being done is because you were  
 25 understaffed?

1 out like that, it's impossible to do that. So,  
 2 when you do your searches in SHU, you search  
 3 kind of, like, the common areas, and, you know,  
 4 things of that nature, during the day, you  
 5 know, because inmates are going to recreation,  
 6 medical, and all this, and things of that  
 7 nature, or whatever. And so, and you have more  
 8 people. So, it's a lot easier to move people  
 9 from one place, holding cell over here, search  
 10 the cell, put them back. It's a lot easier.  
 11 When I'm on the evening shift, if, you know, if  
 12 I'm doing social visits - social visits, well,  
 13 that, too - social visits, or phone calls, or  
 14 cell sanitation, meaning that, you know,  
 15 inmates get the broom and sweeps out his cell,  
 16 I hold the bag up to the slot, he throws his  
 17 trash out, and then I'm onto the next one. You  
 18 know, it's --  
 19 MR. [REDACTED]: Okay.  
 20 MR. [REDACTED]: -- yeah.  
 21 MR. [REDACTED]: So, are you aware that,  
 22 at the time, in August 2019, though, it was a  
 23 policy at least, maybe not practice, but a  
 24 policy, that five cell searches were supposed  
 25 to be being conducted during the evening watch?

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: Okay. Overworked and  
 3 understaffed?  
 4 MR. [REDACTED]: Yes.  
 5 MR. [REDACTED]: Okay. Do you remember  
 6 them ever being done at night watch?  
 7 MR. [REDACTED]: No. I've never seen a cell  
 8 search conducted on the evening shift.  
 9 MR. [REDACTED]: Okay. That's all I got.  
 10 MR. [REDACTED]: That's all I got, too.  
 11 MR. [REDACTED]: Anything - you've got  
 12 questions for us? - or anything you want to ask  
 13 about this stuff, or -?  
 14 MR. [REDACTED]: Hmm. Where do I stand in the  
 15 mix of all this, at this point?  
 16 MR. [REDACTED]: We don't -. This is a  
 17 big investigation. We're talking to a ton of  
 18 people.  
 19 MR. [REDACTED]: Mm-hmm.  
 20 MR. [REDACTED]: So, as far as what we do  
 21 is, we just basically put the puzzle together.  
 22 MR. [REDACTED]: Mm-hmm.  
 23 MR. [REDACTED]: We don't, you know, say  
 24 this person or, you know? We basically give our  
 25 report to the BOP, and the BOP determines --

1 MR. [REDACTED]: Mm-hmm.  
 2 MR. [REDACTED]: -- what it is that's  
 3 going to happen to people. So, I can't  
 4 necessarily say this or that, how you stand, or  
 5 how you don't stand. We're the fact finders.  
 6 MR. [REDACTED]: Mm-hmm.  
 7 MR. [REDACTED]: You know, we, you know,  
 8 we present information. We don't make  
 9 determinations. So, based upon, you know - and  
 10 again, I think you've already provided all this  
 11 information in the past - it's just now, we  
 12 needed to gain clarification of exactly what  
 13 you meant from what you said --  
 14 MR. [REDACTED]: Okay.  
 15 MR. [REDACTED]: -- and that was, again,  
 16 the purpose of this. So, we can't really say.  
 17 What we can say is that - again - you're kind  
 18 of, like, a small piece of this puzzle.  
 19 MR. [REDACTED]: Mm-hmm. My next question is,  
 20 even though this happened so long ago, why wait  
 21 so long?  
 22 MR. [REDACTED]: And then, that's --  
 23 MR. [REDACTED]: Because that's not the only --  
 24 Like, that's an incident, yes, and it's a big  
 25 one, but working in here, things happen all the

1 MR. [REDACTED]: -- and it's also why  
 2 there's a new case agent. So - you know, on  
 3 this - so, to make sure that we're going  
 4 through these things, it's, like, why weren't  
 5 these questions asked? Why weren't, you know,  
 6 that's part of the reason --  
 7 MR. [REDACTED]: Yeah.  
 8 MR. [REDACTED]: -- why we're here.  
 9 MR. [REDACTED]: And --  
 10 MR. [REDACTED]: Is to say, like, all  
 11 right, well, we'll reading this, but what does  
 12 he mean by that? You know what I mean?  
 13 MR. [REDACTED]: Mm-hmm.  
 14 MR. [REDACTED]: So, that's - again - why  
 15 we're here, is, like, all right, I could see  
 16 that you said whatever it is you said, but it's  
 17 not clear at all with what you meant.  
 18 MR. [REDACTED]: Right.  
 19 MR. [REDACTED]: And so, that's why we're  
 20 here, is to just get clarity on exactly what it  
 21 was that was stated, and it's also part of the  
 22 reason why we've --  
 23 MR. [REDACTED]: Got the recorder.  
 24 MR. [REDACTED]: -- recorded every single  
 25 on these, is so that we don't have that problem

1 time. So --  
 2 MR. [REDACTED]: Sure.  
 3 MR. [REDACTED]: -- to be expected to remember  
 4 --  
 5 MR. [REDACTED]: I totally understand.  
 6 MR. [REDACTED]: -- something from 2019, all  
 7 the way to 2021, and since that timeframe, I've  
 8 had other inmates attempt suicide, I've had --  
 9 MR. [REDACTED]: Sure.  
 10 MR. [REDACTED]: -- other inmates attack staff  
 11 members. I've had to, you know, be a part of a  
 12 use of force teams. Multiple things. And I  
 13 got to go back to 2019 and try to remember  
 14 specific details --  
 15 MR. [REDACTED]: Absolutely. No, and that  
 16 is --  
 17 MR. [REDACTED]: -- do you know how difficult  
 18 that is?  
 19 MR. [REDACTED]: -- I couldn't agree more,  
 20 and those details should have been provided in  
 21 2019. They should have been asked. It's part  
 22 of the reason why a senior special agent is on  
 23 this, is to make sure that these questions are  
 24 being asked --  
 25 MR. [REDACTED]: Oh.

1 in the future of, like, well, now we can say  
 2 exactly what was the question that was asked,  
 3 what was stated --  
 4 MR. [REDACTED]: Stated --  
 5 MR. [REDACTED]: -- in response.  
 6 MR. [REDACTED]: -- and what was meant.  
 7 MR. [REDACTED]: Right.  
 8 MR. [REDACTED]: Mm-hmm.  
 9 MR. [REDACTED]: And so, that's part of  
 10 it. The old case agent, at least from us, is  
 11 no longer with us. So, that's another reason  
 12 why, you know, there's a lot of reasons why  
 13 we're doing it now, and we weren't able to do  
 14 it for a time period.  
 15 MR. [REDACTED]: Mm-hmm.  
 16 MR. [REDACTED]: I'm just not -. I'm not  
 17 sure that I can, you know, I can disclose what  
 18 those --  
 19 MR. [REDACTED]: Mm-hmm.  
 20 MR. [REDACTED]: -- reasons were. But  
 21 there were reasons. And now, we're trying to  
 22 move as fast as we can. I don't know if you've  
 23 heard, but we've been in here talking to a lot  
 24 of people.  
 25 MR. [REDACTED]: Yeah. I've heard. I heard

1 that somebody was here. Who it was, I don't  
 2 know.  
 3 MR. [REDACTED]: Yeah. Yeah.  
 4 MR. [REDACTED]: But now, I do.  
 5 MR. [REDACTED]: Yeah. So, we're talking  
 6 to a lot of people, especially a lot of people  
 7 that, you know, worked August 9th and 10th,  
 8 because we've got to, you know --  
 9 MR. [REDACTED]: Mm-hmm.  
 10 MR. [REDACTED]: -- got to make sure that  
 11 we have our information right. Not just that  
 12 we talked to people, but we've got to make sure  
 13 that that's the actual, accurate information.  
 14 So --  
 15 MR. [REDACTED]: Fair enough.  
 16 MR. [REDACTED]: -- so, that's why we're  
 17 back out here, is primarily to make sure that  
 18 things are accurate.  
 19 MR. [REDACTED]: Okay. Not a problem. And so,  
 20 with all this and everything like that, so,  
 21 what's the next course of action? So, I've been  
 22 interviewed, you're still interviewing other  
 23 people. So, what happens next?  
 24 MR. [REDACTED]: That's what we're kind of  
 25 saying, is, like, we take the information and

1 MR. [REDACTED]: Nope.  
 2 MR. [REDACTED]: -- I think this part right  
 3 here now. Right?  
 4 MR. [REDACTED]: All right. Anything  
 5 else?  
 6 MR. [REDACTED]: If you can think of anything  
 7 else, anything else you think that you forgot  
 8 to share with us --  
 9 MR. [REDACTED]: Mm-hmm.  
 10 MR. [REDACTED]: -- you're (Indiscernible  
 11 \*01:57:23).  
 12 MR. [REDACTED]: Now, on that note,  
 13 though, being that this will be reviewed, is  
 14 there anything you want to say for the record?  
 15 MR. [REDACTED]: Pretty much that, like,  
 16 although it may be a tragedy that he's gone, I  
 17 wasn't here, I didn't have anything to do with  
 18 it. And I really don't think that, you know,  
 19 [REDACTED] and [REDACTED] should be going through what  
 20 they're going through. I'm not saying that  
 21 they didn't make a mistake. But that's  
 22 personal opinion.  
 23 MR. [REDACTED]: Okay.  
 24 MR. [REDACTED]: Are you still in  
 25 communication with them?

1 we pass it along. When that will happen, I  
 2 couldn't tell you that.  
 3 MR. [REDACTED]: Okay.  
 4 MR. [REDACTED]: Ultimately, though, I  
 5 would think what would, you know, if you're  
 6 talking about what happens specifically with  
 7 you, that would be in the hands of the BOP.  
 8 So, and who in the BOP? I don't know about  
 9 that.  
 10 MR. [REDACTED]: Okay.  
 11 MR. [REDACTED]: I don't know if it  
 12 happens with the warden level. I don't know if  
 13 it happens with OIA. I don't know what happens  
 14 there. But yeah. Timing. Like, I don't know.  
 15 All I know is we're not judge and jury. All we  
 16 are is the --  
 17 MR. [REDACTED]: Mm-hmm.  
 18 MR. [REDACTED]: -- the questioners.  
 19 MR. [REDACTED]: Do the -. Find the facts.  
 20 MR. [REDACTED]: Gotcha.  
 21 MR. [REDACTED]: Can I see all the documents  
 22 we showed? You signed all?  
 23 MR. [REDACTED]: Yeah, he did.  
 24 MR. [REDACTED]: You sure. All right.  
 25 Anything in there, right? I think this --

1 MR. [REDACTED]: No. I never had either one of  
 2 their phone numbers.  
 3 MR. [REDACTED]: Okay.  
 4 MR. [REDACTED]: Okay. Great. Well, I  
 5 appreciate your time. Thank you very much for  
 6 your cooperation. It is --  
 7 MR. [REDACTED]: 8:16.  
 8 MR. [REDACTED]: -- 8:16 p.m. This is  
 9 Senior Special Agent [REDACTED] [REDACTED], and I'm  
 10 turning off the recorder.  
 11  
 12  
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 25

CERTIFICATE

I hereby certify that the foregoing pages represent an accurate transcript of the electronic sound recording of the proceedings before the Department of Justice, Office of the Inspector General in the matter of:

Interview of [REDACTED] [REDACTED]

Brianna Rose Burton, Transcriber