

DIGITALLY RECORDED
SWORN STATEMENT
OF

[REDACTED]

OIG CASE #:
2019-010614

DEPARTMENT OF JUSTICE
OFFICE OF THE INSPECTOR GENERAL
OCTOBER 27, 2021

RESOLUTE DOCUMENTATION SERVICES

Phone: [REDACTED]

APPEARANCES:

OFFICE OF THE INSPECTOR GENERAL

BY: [REDACTED]
BY: [REDACTED]

WITNESS:

[REDACTED]

OTHER APPEARANCES:

NONE

1 MR. [REDACTED]: The recorder is on.
 2 MR. [REDACTED]: My name is [REDACTED]. I
 3 am a Special Agent with the U.S. Department of
 4 Justice, Office of the Inspector General, New
 5 York Field Office, and these are my
 6 credentials.
 7 MS. [REDACTED]: Thank you.
 8 MR. [REDACTED]: This interview with Federal
 9 Bureau of Prisons employee, Captain Kim
 10 [REDACTED]. Did I get that right?
 11 MS. [REDACTED]: [REDACTED].
 12 MR. [REDACTED]: [REDACTED].
 13 MS. [REDACTED]: Yes.
 14 MR. [REDACTED]: Is being conducted as part of
 15 an official U.S. Department of Justice, Office
 16 of the Inspector General investigation.
 17 Today's date is October 27th. The time is
 18 11:25 a.m. This interview is being conducted
 19 at the OIG, New York Field Office, located on
 20 the [REDACTED], New
 21 York, New York. Also present is:
 22 MR. [REDACTED]: DOJ/OIG Senior Special
 23 Agent, [REDACTED]. And these are my
 24 credentials.
 25 MS. [REDACTED]: Thank you.

1 MR. [REDACTED]: Thank you.
 2 MR. [REDACTED]: This interview will be
 3 recorded by me, Special Agent [REDACTED].
 4 Could everyone please identify themselves for
 5 the record, and spell your last name? To
 6 start, again, I am DOJ/OIG Special Agent,
 7 [REDACTED].
 8 MR. [REDACTED]: Senior Special Agent
 9 [REDACTED].
 10 MS. [REDACTED]: And Captain
 11 [REDACTED], as in [REDACTED].
 12 MR. [REDACTED]: Thank you. This is an
 13 official DOJ/OIG investigation into the death
 14 of inmate Jeffrey Epstein, and you are being
 15 asked to voluntarily provide answers to our
 16 questions. Will you agree to a voluntary
 17 interview with the DOJ/OIG?
 18 MS. [REDACTED]: Yes.
 19 MR. [REDACTED]: Okay. I'm going to provide
 20 you with a form. OIG form III-226/2. It
 21 states, "United States Department of Justice,
 22 Office of the Inspector General Warnings and
 23 Assurances to Employees Requested to Provide
 24 Information on a Voluntary Basis. You are
 25 being asked to provide information as part of

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

7
1 [REDACTED]
2 [REDACTED]
3 [REDACTED].
4 MR. [REDACTED]: Thank you. What is your date
5 of birth?
6 MS. [REDACTED]: [REDACTED].
7 MR. [REDACTED]: What is your social security
8 number?
9 MS. [REDACTED]: [REDACTED].
10 MR. [REDACTED]: What is your current cell
11 phone number?
12 MS. [REDACTED]: Area code is [REDACTED].
13 MR. [REDACTED]: What is your highest level of
14 education?
15 MS. [REDACTED]: Some college.
16 MR. [REDACTED]: Which college?
17 MS. [REDACTED]: Just a couple-community
18 college.
19 MR. [REDACTED]: Okay.
20 MS. [REDACTED]: In my hometown. Back in
21 Indiana.
22 MR. [REDACTED]: What was the name of the
23 college?
24 MS. [REDACTED]: Commonwell (Phonetic Sp.
25 *00:04:27) Business College.

6
1 MS. [REDACTED]: And signature and print?
2 MR. [REDACTED]: Yes. This is [REDACTED].
3 I'm signing on the Signature of the Special
4 Agent. Agent [REDACTED], can you please sign
5 as a witness?
6 MR. [REDACTED]: Yes. I am signing as a
7 witness. Put my name, and I will enter the
8 date, time, and place.
9 MR. [REDACTED]: Thank you. Captain [REDACTED],
10 before starting the interview, I would like to
11 place you under oath. Can you please raise
12 your right hand?
13 MS. [REDACTED]: Yeah.
14 MR. [REDACTED]: Do you swear to tell the
15 truth and nothing but the truth during this
16 interview?
17 MS. [REDACTED]: Yes.
18 MR. [REDACTED]: Thank you. You can put your
19 hand down. Please let me know if you do not
20 understand any questions I ask, and I will try
21 to repeat it, or rephrase it for you.
22 MS. [REDACTED]: Okay.
23 MR. [REDACTED]: What is your current home
24 address?
25 MS. [REDACTED]: [REDACTED]-

8
1 MR. [REDACTED]: Okay. And was there a
2 concertation you were following?
3 MS. [REDACTED]: No.
4 MR. [REDACTED]: Okay. What did you do prior
5 to working for the BOP?
6 MS. [REDACTED]: I worked for Indiana State
7 Corrections.
8 MR. [REDACTED]: And how long was that for?
9 MS. [REDACTED]: I started, it was about, I
10 believe I started in 1993. And then, I left
11 there in '98, and came to the BOP.
12 MR. [REDACTED]: Okay. In '98, you came to
13 the BOP?
14 MS. [REDACTED]: Yes.
15 MR. [REDACTED]: Okay. Did you have any
16 military service?
17 MS. [REDACTED]: No.
18 MR. [REDACTED]: Okay. And have you been with
19 the BOP since 1998?
20 MS. [REDACTED]: Yes.
21 MR. [REDACTED]: Okay. Do you remember your
22 exact enter on duty date?
23 MS. [REDACTED]: April 26, 1998.
24 MR. [REDACTED]: Thank you. And what is your
25 current employment status?

9

1 MS. [REDACTED]: I'm sorry. I don't
2 understand.
3 MR. [REDACTED]: What is your current
4 position with --
5 MR. [REDACTED]: Yeah.
6 MR. [REDACTED]: -- the BOP?
7 MS. [REDACTED]: I'm a captain. I'm sorry.
8 MR. [REDACTED]: At the FCI Fort --
9 MS. [REDACTED]: At Fort --
10 MR. [REDACTED]: -- Dix.
11 MS. [REDACTED]: -- yes. At FCI Fort Dix.
12 I'm the complex captain.
13 MR. [REDACTED]: Okay. And prior to being
14 captain at FCI Fort Dix, were you employed at
15 the MCC?
16 MS. [REDACTED]: Well, I was the deputy
17 captain at Fort Dix. Then I got the
18 institution captain, but prior to that, yes, I
19 was employed at MCC New York.
20 MR. [REDACTED]: During what time period?
21 MS. [REDACTED]: I started in -. I
22 transferred to MCC in April of 2013, and I left
23 in September 2019.
24 MR. [REDACTED]: And what was, in September
25 2019, you transferred over to -?

11

1 MS. [REDACTED]: Well, the administrative
2 lieutenant is part of the custody department,
3 because everything I did involved officers and
4 lieutenants.
5 MR. [REDACTED]: Okay. And in terms, I know
6 there is an operations lieutenant. There is an
7 activities lieutenant.
8 MS. [REDACTED]: Mm-hmm.
9 MR. [REDACTED]: And where would you fall
10 under? Like, do you work side by side with
11 them, or is there a separate department that
12 you are -?
13 MS. [REDACTED]: Well, we worked on the same
14 floor. But I don't do the same duties that
15 they do.
16 MR. [REDACTED]: Okay.
17 MS. [REDACTED]: So, I would be there with
18 them, but they would be covering the shift. I
19 had nothing to do with the shift itself. You
20 know, the trips that went out, or the work
21 assignments or whatever. I would do the work
22 assignments prior to them actually working on
23 that day. So, as the administrative
24 lieutenant, my responsibility was to generate
25 the daily rosters, and the quarterly rosters,

10

1 MS. [REDACTED]: FCI Fort Dix.
2 MR. [REDACTED]: As a deputy --
3 MS. [REDACTED]: Captain.
4 MR. [REDACTED]: -- captain.
5 MS. [REDACTED]: Mm-hmm.
6 MR. [REDACTED]: What was your position at the
7 MCC in 2019?
8 MS. [REDACTED]: I was a lieutenant.
9 MR. [REDACTED]: A lieutenant. Okay. Was
10 that a nine, or -?
11 MS. [REDACTED]: No. I was an 11.
12 MR. [REDACTED]: An 11.
13 MS. [REDACTED]: Mm-hmm.
14 MR. [REDACTED]: Okay. And as a lieutenant at
15 the MCC, what were your duties there?
16 MS. [REDACTED]: That year, I was assigned as
17 the administrative lieutenant. So, my duties
18 consisted of making sure the staff and the
19 correctional services department got their
20 training. I did everybody's schedules.
21 Sometimes, I covered shifts. If the captain
22 wasn't there, I acted in his capacity. Just
23 various, you know, responsibilities.
24 MR. [REDACTED]: It was not in custody, it was
25 more, you said administrative?

12

1 and give those to the lieutenants, and then
2 they did whatever they needed to do with them.
3 MR. [REDACTED]: Okay. And who reported to
4 you directly?
5 MS. [REDACTED]: The officers reported to me.
6 And that was pretty much it.
7 MR. [REDACTED]: Which officers?
8 MS. [REDACTED]: All of them, because I did
9 all of their schedules. So, they came to me if
10 they had an issue, or they needed time off,
11 they had an issue with their schedule. They
12 were out on workman's comp. Or, you know,
13 anything dealing with leave time, or anything,
14 they came to me.
15 MR. [REDACTED]: Okay. And you mentioned that
16 you would coordinate training for the
17 employees?
18 MS. [REDACTED]: Mm-hmm.
19 MR. [REDACTED]: What kind of trainings?
20 MS. [REDACTED]: The quarterly mandatory
21 trainings that we were required to do. Our
22 annual trainings that we were required to do.
23 Regular annual refresher training. Firearms
24 training. I had to do all of - schedule all of
25 that.

1 MR. [REDACTED]: Okay. And did you schedule
2 all of that, the quarterly training, the annual
3 refresher training, all that, in 2019?

4 MS. [REDACTED]: Yes. Mm-hmm.

5 MR. [REDACTED]: How is it documented if
6 employees received training?

7 MS. [REDACTED]: So, which training are we
8 talking about? Just any, or -?

9 MR. [REDACTED]: Just --

10 MR. [REDACTED]: Just -.

11 MR. [REDACTED]: -- specifically, we
12 talked about the SHU quarterly training, and
13 the annual refresher training.

14 MS. [REDACTED]: Okay. So, for the annual
15 refresher training, Human Resources would
16 normally get with me. They would tell me the
17 dates that they wanted to do annual refresher
18 training. And what I would do is go onto the
19 roster program. They would let me know how
20 many staff to put in each day. I would go into
21 the program. I would assign them, and then, I
22 would back fill their positions with a non-
23 custody staff member.

24 So, that was documented on every quarterly
25 roster. So, what I used to do was, because I

1 read them, and sign them. And he would do the
2 training, and then just give me the sign in
3 sheet for everybody that attended.

4 MR. [REDACTED]: Okay.

5 MR. [REDACTED]: And prior to them actually
6 starting their rotation in the SHU, this
7 training would have to be completed.

8 MS. [REDACTED]: Yes.

9 MR. [REDACTED]: All right. And it's a
10 mandatory training?

11 MS. [REDACTED]: Yes.

12 MR. [REDACTED]: And what topics does the
13 training cover?

14 MS. [REDACTED]: We have a Special Housing
15 Unit slide show. That's the normal training.

16 MR. [REDACTED]: Yeah.

17 MS. [REDACTED]: But what the training should
18 cover, outside of them doing that slide show,
19 that SHU, normally the SHU lieutenant does the
20 training. Outside of that slide show, they
21 should be discussing with them how to operate
22 the SHU program. We have psychology come in
23 and do a class on suicide prevention. Hunger
24 strikes. They should be talking to them about
25 how to fill out the documentation for 292s.

1 sat with the union, to determine which non-
2 custody staff member went to what post, I would
3 keep that, I would have them bid on what they
4 wanted to work. And I would keep that
5 documentation in the administrative office with
6 me. As far as the quarterly training goes,
7 every quarter, any staff member who bid to work
8 in SHU - in the Special Housing Unit, I'm
9 sorry.

10 Any staff member that bid to work there,
11 they had to go through mandatory quarterly
12 training. So, what I would do is, I would get
13 with the SHU lieutenant to figure out a date.
14 It has to be completed before the new quarter
15 starts. And he would tell me whatever - he or
16 she - would tell me whatever date they wanted
17 to do it. Every staff member that was on the
18 quarterly roster, that would be in SHU, was
19 scheduled to attend that training. We would do
20 it in a classroom setting, for, like, a four-
21 hour block. And all I would do was schedule
22 the training, let the SHU lieutenant know, make
23 sure he had the post orders, because all field
24 office the staff who were going to be up there
25 was supposed to go through the post orders, and

1 Just anything dealing with SHU, period, that
2 lieutenant is supposed to go over it with them,
3 as well as have them watch that slide show.

4 MR. [REDACTED]: So, are they allowed to work
5 in the SHU without getting that training?

6 MS. [REDACTED]: Yes. However, they
7 shouldn't because that training is documented.
8 Every quarter, we have to send to the region
9 that it was completed. And it also gets, I
10 believe it gets keyed into their training file
11 with Human Resources.

12 MR. [REDACTED]: And who was required to
13 ensure that they receive that training?

14 MS. [REDACTED]: The SHU lieutenant.

15 MR. [REDACTED]: Okay. And then, what
16 would your role be in that? Like, if someone
17 didn't actually - someone would bid for that
18 quarterly position, and actually wasn't able,
19 for whatever reason, to attend the actual
20 quarterly training, for the SHU, what is the
21 protocol? What should have taken place?

22 MS. [REDACTED]: So, if, just say for
23 instance, can I give an example --

24 MR. [REDACTED]: Absolutely.

25 MS. [REDACTED]: -- okay. So, just say for

1 instance a staff member was out on a workman's
2 comp. They had missed the SHU training for
3 that reason, or they were on annual leave.
4 When they come back to work, I would coordinate
5 it with the SHU lieutenant, to have that person
6 go over the training with them. And then, they
7 would come back and make sure that they sign
8 that they completed the training. And again, I
9 kept that stored in, on file in my office. In
10 the admin office.

11 MR. [REDACTED]: All right. So, it sounds
12 like you were the one who kind of keeps records
13 of who has done it, and who has not. You then
14 coordinate it with the SHU lieutenant, and say
15 if this person needs to take it. And then,
16 after they take it, they are supposed to come
17 to you and sign it?

18 MS. [REDACTED]: No. Not -. After they take
19 it, I would give the SHU lieutenant the sign-in
20 sheet.

21 MR. [REDACTED]: Okay.

22 MS. [REDACTED]: Because that person should
23 sign for the date that they actually completed
24 the training.

25 MR. [REDACTED]: Okay.

1 everybody for that one day, for four hours.

2 MR. [REDACTED]: And let's say if somebody
3 missed it, and they came back, they would have
4 to sit through that four hours?

5 MS. [REDACTED]: Well, once I would tell the
6 SHU lieutenant this person is back, you got to
7 make sure that they complete the training. I'm
8 not sure how he went about doing it with them.
9 Because I didn't attend the training. I never
10 attended the training. I just scheduled it.

11 MR. [REDACTED]: Who schedules the trainers?
12 Who picks the trainers and schedules them to
13 teach the class?

14 MS. [REDACTED]: Well, any lieutenant can
15 teach training for the Special Housing Unit.
16 During annual refresher training, every year
17 when we do it, it's a lieutenant assigned to do
18 it.

19 MR. [REDACTED]: So, normally, it's a
20 lieutenant. So, in this case, if a C.O. missed
21 the training, they come back, the lieutenant
22 can technically give the full training?

23 MS. [REDACTED]: They can.

24 MR. [REDACTED]: Okay. And how soon after
25 they come back from training should the

1 MS. [REDACTED]: So, the sign-in sheet would
2 have everybody that actually attended on the
3 scheduled day, and then the names of the people
4 who still needed to attend it. And once they
5 do it, they are supposed to sign, and sign for
6 the date that they do it.

7 MR. [REDACTED]: Okay.

8 MR. [REDACTED]: So, my next question would
9 have been, if any employee was not able to
10 attend training, was there a makeup training
11 session involved?

12 MS. [REDACTED]: Yes.

13 MR. [REDACTED]: And that would be not by you,
14 that would be by the SHU lieutenant?

15 MS. [REDACTED]: Yes.

16 MR. [REDACTED]: Okay. And do they normally
17 get training? How long is the SHU training?
18 How long does it normally take? The quarterly
19 training.

20 MS. [REDACTED]: We usually schedule it for a
21 four-hour block.

22 MR. [REDACTED]: For how many days?

23 MS. [REDACTED]: One. Just one day.

24 MR. [REDACTED]: So, one day, four hours?

25 MS. [REDACTED]: Mm-hmm. I would schedule

1 lieutenant give them a training?

2 MS. [REDACTED]: Right away, if they are
3 going to have them in SHU. I would -. I tried
4 my best - because I was the admin lieutenant
5 there for a long time - so, I tried my best to
6 keep up with that, to make sure, as soon as
7 this person came back, they did whatever they
8 needed to do.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: But I can I --

11 MR. [REDACTED]: Yeah. Sure.

12 MS. [REDACTED]: -- say something?

13 MR. [REDACTED]: Yeah.

14 MR. [REDACTED]: Absolutely.

15 MS. [REDACTED]: Because you had asked me,
16 can a person work in the Special Housing Unit
17 without the training, and like I said, yes, but
18 they shouldn't. However, you had a lot of non-
19 custody staff who weren't required to take this
20 training. Because they weren't in correctional
21 services.

22 MR. [REDACTED]: But the quarterly bided
23 people --

24 MS. [REDACTED]: The quarterly bided people
25 --

1 MR. [REDACTED]: -- were required.
 2 MS. [REDACTED]: -- had to do it.
 3 MR. [REDACTED]: Right.
 4 MS. [REDACTED]: That was it.
 5 MR. [REDACTED]: Okay.
 6 MR. [REDACTED]: Yes.
 7 MR. [REDACTED]: Do you recall a C.O. by the
 8 name of Tova Noel?
 9 MS. [REDACTED]: Yes.
 10 MR. [REDACTED]: Do you know if in that
 11 quarter that - this would be June, July, August
 12 of 2019 - if she was one of those C.O.s that
 13 bid for the SHU?
 14 MS. [REDACTED]: I don't remember. I think
 15 she got a relief post in SHU, if I'm not
 16 mistaken, and I do remember, she was out for a
 17 while because she had injured, I don't know if
 18 it was her ankle or something. She was out on
 19 workman's comp. So, around that time, when we
 20 did the training, she wasn't there.
 21 MR. [REDACTED]: She wasn't there.
 22 MS. [REDACTED]: Hmm-mm.
 23 MR. [REDACTED]: Now -.
 24 MR. [REDACTED]: Whoa, whoa. So, what
 25 happened if she wasn't there?

1 completed it.
 2 MR. [REDACTED]: And for any of these
 3 people, did you review the training with them,
 4 or was it always the SHU lieutenant that was
 5 supposed to review the training with them?
 6 MS. [REDACTED]: No. I never did the
 7 training with them. It was always the SHU
 8 lieutenant, or whoever was assigned to SHU at
 9 that time.
 10 MR. [REDACTED]: So, with this sign-in
 11 sheet, would you, did you give that sign-in
 12 sheet to the lieutenant to have them sign, or
 13 would you go to the employee themselves and
 14 have them sign it?
 15 MS. [REDACTED]: No. I gave this to the
 16 lieutenant.
 17 MR. [REDACTED]: All right. So, in this
 18 instance, we spoke with Tova Noel. She is
 19 claiming that you went directly to her with
 20 this, and asked her to sign it. Do you recall
 21 that?
 22 MS. [REDACTED]: No.
 23 MR. [REDACTED]: No?
 24 MS. [REDACTED]: No. I remember speaking to
 25 her, and she returned back to work, from her

1 MS. [REDACTED]: Once she came back, the SHU
 2 lieutenant would have gotten with her to get
 3 with her to have her take care of it, and have
 4 her sign.
 5 MR. [REDACTED]: Okay. Go ahead.
 6 MR. [REDACTED]: Okay. Is this the mandatory
 7 quarterly SHU training for 2019?
 8 MS. [REDACTED]: Yes.
 9 MR. [REDACTED]: The date shows 6/6/2019?
 10 MS. [REDACTED]: Mm-hmm.
 11 MR. [REDACTED]: Is that the -?
 12 MS. [REDACTED]: Yeah. I'm sorry. Yes.
 13 MR. [REDACTED]: Okay. And that is the sign-
 14 in sheet?
 15 MS. [REDACTED]: Yes.
 16 MR. [REDACTED]: Okay.
 17 MR. [REDACTED]: So, on the sign-in sheet,
 18 it shows different dates on it. Do you know
 19 what they would represent?
 20 MS. [REDACTED]: So, as I said, the
 21 difference dates would be because, when we
 22 actually had this training, these people
 23 probably weren't here. So, once they came
 24 back, they had to do the training, and sign
 25 that they completed it on the date that they

1 injury, and I told her she had to do the
 2 training.
 3 MR. [REDACTED]: Okay.
 4 MS. [REDACTED]: But I didn't have her sign
 5 this.
 6 MR. [REDACTED]: Do you remember her
 7 saying -. So, she returned to work on or
 8 around June 24th of 2021.
 9 MS. [REDACTED]: Mm-hmm.
 10 MR. [REDACTED]: The SHU was her quarterly
 11 --
 12 MR. [REDACTED]: 2019. Sorry.
 13 MR. [REDACTED]: -- sorry. 2019. The SHU
 14 was her quarterly bid post. And she says
 15 that, on the 26th, is when she signed, that you
 16 came to her directly and said, you have to sign
 17 this, and she said she didn't get it from the
 18 lieutenant. She got it directly from you.
 19 Does that --
 20 MS. [REDACTED]: No.
 21 MR. [REDACTED]: -- ring a bell at all?
 22 MS. [REDACTED]: No.
 23 MR. [REDACTED]: All right. We just want
 24 to read you some quotes from her transcript.
 25 Just to see, you know, what your response is to

1 this. We asked her, "Who was your direct
2 supervisor?" And she said, "Lieutenant
3 [REDACTED]." Would that be accurate?

4 MS. [REDACTED]: No.

5 MR. [REDACTED]: So, you didn't believe
6 that you were her direct supervisor?

7 MS. [REDACTED]: Well, the operations
8 lieutenant on her shift, or the activities
9 lieutenant on her shift was her direct
10 supervisor.

11 MR. [REDACTED]: Okay. So, that changes
12 every day, but I guess if we had one specific
13 one that was a constant, would that be you?

14 MS. [REDACTED]: No. She was dealing with me
15 while she was out on workman's comp, because
16 while she was out, I was the one getting her
17 doctor's notes, and calling to check on her, or
18 if she had, like, a CA-7 that needed to be
19 filled out, so she can keep getting paid, I had
20 to fill that out.

21 MR. [REDACTED]: Okay. So, while she was
22 out, up until at least the 24th of - June -
23 2019, that's why she considered you her
24 supervisor, because you were the one dealing
25 directly with her?

1 MS. [REDACTED]: I'm assuming.

2 MR. [REDACTED]: Okay.

3 MS. [REDACTED]: But once she returned to
4 work, whoever that shift lieutenant was, would
5 be who she would deal with.

6 MR. [REDACTED]: Okay. So then, we asked,
7 it says - and this is me speaking - "You
8 mentioned you didn't remember ever going to
9 quarterly SHU training. This is a sign-in
10 sheet for quarterly SHU training. I just want
11 you to, is this your signature on there for
12 June 26th, 2019?" And she responds, "You see
13 how I'm the last one on the bottom of all of
14 them?" I say, "Correct." She says, "Because I
15 wasn't at the training when I came in," she
16 responded. "Did they provide it to you one on
17 one, though?" She said, "No." I said, "So,
18 how come?" She said, "Because when I came back
19 from an injury, the lieutenant asked me to sign
20 because when they had program review, they need
21 to show that I received the training. But I
22 never did. She just asked me to sign."
23 "That's why I wonder why, who asked you to do
24 that?" I said. And she said, "Lieutenant
25 [REDACTED]."

1 MS. [REDACTED]: Mm-hmm.

2 MR. [REDACTED]: I said, "So, that
3 supervisor you mentioned was your first line
4 supervisor, asked you to sign without providing
5 you the training?" She said, "Yes." I said,
6 "And she didn't, like, provide you anything to
7 review?" She said, "No." And I said, "She
8 didn't go over anything with you?" She said,
9 "No." I said, "Did you discuss this with her,
10 that how can you sign something without being
11 provided the training?"

12 She said, "Well, I just told her I wasn't
13 here. I was out on an injury. She said she
14 knows, but she needed me to sign it because
15 they need it for a program review." I said,
16 "What's her first name?" And she responded,
17 "[REDACTED] [REDACTED]." I said, "And is she a
18 lieutenant?" And Noel said, "She's a - I don't
19 know what she is now - but she is not at MCC
20 anymore. She's at somewhere in Jersey." So,
21 with all that being said, what is your response
22 to Ms. Noel, with her statements to us?

23 MS. [REDACTED]: Her statement is partially
24 true.

25 MR. [REDACTED]: Okay.

1 MS. [REDACTED]: I did explain to her that
2 she needed to complete the training because we
3 had to have it done for our program review.
4 However, I had her do that training with the
5 SHU lieutenant. I would have never had her
6 sign something that she didn't review. And the
7 reason why her name is last on that list is
8 because she came back to work at that time.

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

10 MR. [REDACTED]: Did you ask her to sign the
11 document for the program review, prior to the
12 program review, without her actually taking the
13 training?

14 MS. [REDACTED]: No. I explained to her that
15 she had to complete the training because when
16 we had our program review, they review these
17 documents, and that is part of what they call
18 our working papers. And if one person has - or
19 whoever - has it missed, we get a write-up for
20 that.

21 MR. [REDACTED]: Did you speak with Lieutenant
22 [REDACTED], and instruct him that, hey, listen, he
23 needs to give Tova Noel the training?

24 MS. [REDACTED]: Yes.

25 MR. [REDACTED]: And did he ever confirm with

1 you that he did provide it to her?
 2 MS. [REDACTED]: No. I just got the sign-in
 3 sheet back with her name signed.
 4 MR. [REDACTED]: Oh, so, you didn't give it to
 5 her. You gave it to the lieutenant. And --
 6 MS. [REDACTED]: Yeah.
 7 MR. [REDACTED]: -- the lieutenant got her to
 8 sign in, and provide it back to you?
 9 MS. [REDACTED]: Yes.
 10 MR. [REDACTED]: So, she is saying you
 11 came directly to her. She didn't get any
 12 training from either Lieutenant [REDACTED], who was
 13 the SHU lieutenant at the time, or provided any
 14 kind of sheets to review. She said - and we
 15 can go into greater detail of what she said --
 16 MS. [REDACTED]: Mm-hmm.
 17 MR. [REDACTED]: -- but she said that you
 18 didn't, when she said this to you, you said, I
 19 just need it for the program review, and you
 20 asked her not to date it, and she said that she
 21 intentionally wanted to date it, to show what
 22 date that she did this on.
 23 MS. [REDACTED]: That's not accurate at all.
 24 MR. [REDACTED]: Okay. So, please,
 25 explain to us. And just for the record, we are

1 sign because when they had program review, they
 2 need to show that I received the training, but
 3 I never did. She just asked me to sign." So,
 4 her saying that you asked her to sign that, is
 5 inaccurate?
 6 MS. [REDACTED]: Yes, it is.
 7 MR. [REDACTED]: Okay. And are you
 8 confident with that? Because this is, like, an
 9 under oath. She was under oath, and you are
 10 now under oath. So, now --
 11 MS. [REDACTED]: Mm-hmm.
 12 MR. [REDACTED]: -- we have two
 13 discrepancies of what happened.
 14 MS. [REDACTED]: Yes. I am confident with
 15 that.
 16 MR. [REDACTED]: Do you recall,
 17 specifically? Can you place yourself back into
 18 that conversation? Do you remember
 19 specifically this happening or not happening?
 20 MS. [REDACTED]: I remember specifically
 21 speaking to her about it. And I told her she
 22 had to complete the training, but I did not
 23 have her sign anything.
 24 MR. [REDACTED]: Okay.
 25 MS. [REDACTED]: I didn't. I did tell her

1 not saying that what she said was accurate.
 2 That's why we're asking you --
 3 MS. [REDACTED]: Mm-hmm.
 4 MR. [REDACTED]: -- to just clarify all of
 5 this, of what exactly happened.
 6 MS. [REDACTED]: No. The only conversation
 7 that she and I had, and if I remember
 8 correctly, it was on her first day back, if I
 9 am not mistaken. Her first day back to work,
 10 because she came to me to find out where she
 11 was working. And when we had that
 12 conversation, I did say to her that she had to
 13 complete the training, you know, because we got
 14 to make sure we are in line with everything for
 15 program review. But I never gave her anything
 16 to sign. At all.
 17 MR. [REDACTED]: So, when she says you
 18 specifically gave her this sign-in sheet, you
 19 are saying you did not?
 20 MS. [REDACTED]: No. I did not. And I
 21 definitely didn't tell her not to date it.
 22 MR. [REDACTED]: All right. So, when she
 23 says that, you know, let's go back and read it.
 24 She specifically says, "Because when I came
 25 back from an injury, the lieutenant asked me to

1 that, after she did the training, she was going
 2 to have to sign the sheet. And I told her she
 3 had to complete it because of program review.
 4 I did do that.
 5 MR. [REDACTED]: Okay. Do you recognize -
 6 hold on - this stuff that we are giving you
 7 here. Can you just let us know what this
 8 information is? And what the sign-in sheet is?
 9 MS. [REDACTED]: Okay. So, this is another
 10 sign-in sheet for training. This one would be
 11 for the -. Dr. [REDACTED] was the chief
 12 psychologist. So, that would be discussing
 13 suicide training.
 14 MR. [REDACTED]: Just -.
 15 MS. [REDACTED]: This is -.
 16 MR. [REDACTED]: So, that one was suicide
 17 prevention training?
 18 MS. [REDACTED]: This one was. Yes.
 19 MR. [REDACTED]: Okay.
 20 MS. [REDACTED]: This is Dr. [REDACTED], again,
 21 but this is a different training. This was in
 22 2018.
 23 MR. [REDACTED]: Okay. So, the one that
 24 we are on top, though, that is the sign-in for,
 25 it says June 6, 2019. And then, again, on the

1 bottom, it says T. Noel.
 2 MS. [REDACTED]: Yes.
 3 MR. [REDACTED]: And then, does it have a
 4 date next to that one, too?
 5 MS. [REDACTED]: June 26.
 6 MR. [REDACTED]: Okay. So, that was also
 7 the June 26, 2019. So, it looks like she had
 8 the quarterly, the quarterly post training, or
 9 quarterly, what do you call it --
 10 MR. [REDACTED]: SHU training.
 11 MR. [REDACTED]: -- SHU training. And
 12 then, the suicide prevention training, both
 13 signed on the same date.
 14 MS. [REDACTED]: Mm-hmm.
 15 MR. [REDACTED]: Did you give that -
 16 either one of those - sign-in sheets directly
 17 to Ms. Noel?
 18 MS. [REDACTED]: No.
 19 MR. [REDACTED]: No.
 20 MS. [REDACTED]: Because Dr. [REDACTED] would
 21 keep her own sheet. And also, the SHU
 22 lieutenant, who completed the training, that
 23 person would get a copy of this, as well. And
 24 then, when everything was completed, they would
 25 give me back the sign-in sheets.

1 MS. [REDACTED]: I didn't.
 2 MR. [REDACTED]: -- do you believe that
 3 Lieutenant - would it have been Lieutenant [REDACTED]
 4 that would have provided this to you, when it
 5 was all done?
 6 MS. [REDACTED]: Yes.
 7 MR. [REDACTED]: Okay. So, he wouldn't
 8 have provided that back to you until after June
 9 26, 2019, after Ms. Noel signed?
 10 MS. [REDACTED]: No. Because at the time, if
 11 I had this, then the last person before her was
 12 June 23rd. So, [REDACTED] took care of all of these
 13 people, and then, he gave it back to me. I
 14 can't remember if he just came back after the
 15 6th, when everybody was done, and got it. Or
 16 if he came back. Because I kept them in a
 17 binder. I keep all of these in a binder, in
 18 the admin lieutenant's office. So, all he had
 19 to do was just come get the binder. You see
 20 what I'm saying? So, he could have come and
 21 got it, had them do whatever they needed to do.
 22 And the sheet would have already been in the
 23 binder. And then, he keeps the copy from Dr.
 24 [REDACTED], as well. They are supposed to keep a
 25 binder in the SHU lieutenant's office, with

1 MR. [REDACTED]: Okay. So, if this was
 2 all completed, if the training was done on June
 3 6, 2019, when would you get the sign-in sheets?
 4 MS. [REDACTED]: Whenever the SHU lieutenant
 5 brought down to me. Brought them back to me.
 6 MR. [REDACTED]: Okay. So, in this case,
 7 do you believe it would have been some time
 8 shortly after June 6, 2019?
 9 MS. [REDACTED]: Well, I don't remember that.
 10 But I do remember, because these other people
 11 who weren't there, they had to do the exact
 12 same thing, and the SHU lieutenant got with all
 13 of all them, and had them all do their
 14 training, and sign for their days. I didn't do
 15 any of these people's.
 16 MR. [REDACTED]: Okay. So, and the fact
 17 that, when was the - prior to T. Noel - when
 18 was the last date on that?
 19 MS. [REDACTED]: June, it looks the 23rd, and
 20 then, June 20th.
 21 MR. [REDACTED]: Okay. So, the two prior
 22 were both in the 20s. And you don't believe
 23 you went direct to either of those two, either?
 24 MS. [REDACTED]: No. I didn't.
 25 MR. [REDACTED]: So, do you --

1 these same forms.
 2 MR. [REDACTED]: Okay. So, on this
 3 specific training, this is, these were the
 4 statements that were made, I said, "So, there
 5 is another training that you - it says that you
 6 conducted on also June 26th, 2019, for SHU
 7 suicide prevention training. Did you also not
 8 receive that training?" Ms. Noel responded,
 9 "Yeah. I didn't." I responded, "You did not
 10 receive that training?" She said, "No." I
 11 said, "Did you receive -"
 12 So, there's slides in the back that show
 13 that the training, shows the training and how
 14 they conducted it. Did they provide you with
 15 those slides?" And she responded, "No because
 16 I wasn't there." I said, "You weren't there?"
 17 And she responds, "I was out on injury." I
 18 said, "Okay. Can you - when were you out on
 19 injury? What were the dates?" And she
 20 responded, "From March 2019 to I came back in
 21 June. So, when I came back in June, that's
 22 when I was told to sign this." Again, is this
 23 - you believe it's Lieutenant [REDACTED] that
 24 actually told her to sign it?
 25 MS. [REDACTED]: It should have been. Yes.

1 MR. [REDACTED]: Did you --
 2 MS. [REDACTED]: Yes.
 3 MR. [REDACTED]: -- but it was not you?
 4 MS. [REDACTED]: No.
 5 MR. [REDACTED]: And are you confident it
 6 wasn't you?
 7 MS. [REDACTED]: To my recollection, yes.
 8 MR. [REDACTED]: Okay. Shortly there
 9 later, I said, "But when you came back, was it
 10 around the 26th when they asked you to sign
 11 those?" And she responded, "I came back in
 12 June. I don't recall the date exactly." I
 13 said, "Okay." She said, "But I remember the
 14 day I came back into work, and the lieutenant
 15 asked me to go see Lieutenant [REDACTED]. And she
 16 asked me to sign, and I said, but I wasn't
 17 here. I was out on injury.
 18 And she said she's aware, but they need me
 19 to sign for program review." I said, "Okay."
 20 She said, "So, I signed." And I said, "So,
 21 both trainings, when you signed, they didn't
 22 actually ever provide you anything?" She said,
 23 "No." I said, "Verbally? Electronically?
 24 Nothing?" She said, "No." I said, "Okay. And
 25 that was on the date that was signed that that

1 MS. [REDACTED]: That, and also, too,
 2 probably to find out about what her schedule
 3 would be, or where she is supposed to be
 4 working at. That's the only thing that I could
 5 think of. But we did have the conversation
 6 about the training. But at no time did I ask
 7 her to sign anything.
 8 MR. [REDACTED]: Okay. So, what
 9 conversation did you have about the training?
 10 MS. [REDACTED]: I just told her that she
 11 needed to complete the training. Because part
 12 of her post - if I remember right - it was a
 13 relief post. So, I don't think she was
 14 assigned to SHU every day.
 15 MR. [REDACTED]: Now, did you maybe tell
 16 her sign this training, sign this form, because
 17 I have a program review up. Go do your
 18 training. Don't date it because you didn't do
 19 the training yet?
 20 MS. [REDACTED]: No. I would have never told
 21 her to sign it, because she hadn't completed
 22 it. And I definitely would not have told her
 23 not to date it.
 24 MR. [REDACTED]: Okay. Because again, she
 25 is saying - and this is a question I asked -

1 happened?" Ms. Noel said, "Actually, she told
 2 me not to date it.
 3 I remember when I was signing. She said,
 4 don't date it." And I said, "But you dated it
 5 anyway? Did you have a conversation about
 6 that?" And she said, "No." I said, "After you
 7 dated it, she didn't say, why did you date it?
 8 Or anything like that?" She responded, "No."
 9 So, she is saying all this time, that
 10 specifically, that the lieutenant said to go
 11 see you, and that you had her sign this
 12 information.
 13 MS. [REDACTED]: That's not true.
 14 MR. [REDACTED]: It's not accurate?
 15 MS. [REDACTED]: No. It's not. And if the
 16 lieutenant that was on shift would have told
 17 her to come to see me, it was her first day
 18 back. So, when they returned to work for a
 19 work-related injury, they are supposed to bring
 20 in a note from the doctor, clearing them to be
 21 back at work. So, she would have come to see
 22 me, to give me a copy of that note. Because in
 23 order for her to work, she had to have that
 24 note from her doctor.
 25 MR. [REDACTED]: Okay.

1 "But did you do this per the direction of your
 2 supervisor?" She said, "Supervisor, yes." And
 3 I said, "So, did she specifically say you must
 4 sign this?" Ms. Noel said, "Yes." And I said,
 5 "Okay. And again, that was [REDACTED]?" And Ms.
 6 Noel said, "[REDACTED]." So, she is claiming,
 7 under oath, under penalty of, you know, you
 8 know, of perjury, which is a criminal offense,
 9 which is - again - you are under oath.
 10 MS. [REDACTED]: Mm-hmm.
 11 MR. [REDACTED]: That you specifically
 12 told her to sign this. That's where I just
 13 wanted -. I don't want to trip up, because
 14 this right now is more of an administrative
 15 thing.
 16 MS. [REDACTED]: Mm-hmm.
 17 MR. [REDACTED]: I don't want to bring it
 18 to a criminal.
 19 MS. [REDACTED]: Mm-hmm.
 20 MR. [REDACTED]: If, you know, under oath,
 21 under the penalties of perjury, which is
 22 statute 18 USC 1001, false statements, are you
 23 confident that you did not ask her to sign
 24 this?
 25 MS. [REDACTED]: Yes. I am.

1 MR. [REDACTED]: Okay. So, even though
 2 she has her attorneys present when this is
 3 happening, and she is specifically saying,
 4 throughout all of these questions, [REDACTED],
 5 [REDACTED], [REDACTED].
 6 MS. [REDACTED]: Yes. Because she dealt with
 7 me the whole time that she was out of work.
 8 And again, like I said, I believe I got her to
 9 talk to her on her first day back to work.
 10 MR. [REDACTED]: Mm-hmm.
 11 MS. [REDACTED]: So, I do not, at no time,
 12 ever recall telling her to sign anything, or
 13 not date anything. I do remember telling her
 14 she had to complete this training, because she
 15 was assigned to SHU. If you guys look at these
 16 other dates, for all these other people, and
 17 I'm just saying --
 18 MR. [REDACTED]: Mm-hmm.
 19 MS. [REDACTED]: -- I know they don't have
 20 anything to do with it. They're all the same
 21 just like hers. When they came back, the SHU
 22 lieutenant got with them - and these are all
 23 different dates, same thing - to have them
 24 complete this training. I didn't have them do
 25 it.

1 MS. [REDACTED]: That took care of that.
 2 MR. [REDACTED]: And again, do you
 3 believe, it sounded like you said that the SHU
 4 lieutenant could have come into your office,
 5 retrieved these documents, and --
 6 MS. [REDACTED]: Well --
 7 MR. [REDACTED]: -- had her sign it?
 8 MS. [REDACTED]: -- the binder for the sign-
 9 in sheets for the Special Housing Unit was in
 10 my office. Because I kept up with all of
 11 these. I maintained all of these forms, just
 12 to make sure that everybody stayed up on what
 13 it was that they were supposed to do, because
 14 when we have our program review, those
 15 documents would be reviewed in the office that
 16 I worked in. We all were responsible for them.
 17 It wasn't just me. My office was opened.
 18 Every lieutenant had a key to it.
 19 MR. [REDACTED]: Mm-hmm.
 20 MS. [REDACTED]: And I am not at all saying
 21 that [REDACTED] would have come in my office and
 22 taken some something that he shouldn't have
 23 taken, or whatever the case may be. I remember
 24 having a conversation with [REDACTED] to tell him,
 25 when these people come back to work, they need

1 MR. [REDACTED]: Okay.
 2 MR. [REDACTED]: Are those all SHU employees?
 3 Can you verify --
 4 MS. [REDACTED]: At the time --
 5 MR. [REDACTED]: -- at the time.
 6 MS. [REDACTED]: -- yes, they were.
 7 MR. [REDACTED]: All right. So, if we go
 8 and speak with Lieutenant [REDACTED], do you believe
 9 he is going to say, yes, I had her sign this?
 10 MS. [REDACTED]: I would hope so.
 11 MR. [REDACTED]: Okay. But you are
 12 absolutely confident - under oath, again, you
 13 could be prosecuted if we find out you are
 14 lying - that this, you did not have her sign
 15 these documents?
 16 MS. [REDACTED]: No. I did not have her sign
 17 these. I do not recall having her sign these
 18 at all.
 19 MR. [REDACTED]: Okay.
 20 MS. [REDACTED]: At all.
 21 MR. [REDACTED]: And who do you believe
 22 had her sign these?
 23 MS. [REDACTED]: It should have been the SHU
 24 lieutenant.
 25 MR. [REDACTED]: Okay.

1 to get their SHU training done, because all of
 2 these people were out on the 6th, when the
 3 training occurred.
 4 MR. [REDACTED]: Okay. And you recall
 5 specifically telling Ms. Noel, get the training
 6 done?
 7 MS. [REDACTED]: I recall specifically
 8 telling her she had to do the training.
 9 MR. [REDACTED]: Okay. But you are
 10 positive you didn't have her sign those
 11 documents?
 12 MS. [REDACTED]: Yes.
 13 MR. [REDACTED]: Okay.
 14 MS. [REDACTED]: As far as I can recall, yes,
 15 sir, I am positive I didn't.
 16 MR. [REDACTED]: Okay. Great. So, I
 17 guess we'll have to revisit that with
 18 Lieutenant [REDACTED]. Sorry. I hand it back to
 19 you. I just figured it was better for me to
 20 read it.
 21 MR. [REDACTED]: Yeah.
 22 MR. [REDACTED]: Being that I was the one
 23 on this transcript.
 24 MR. [REDACTED]: No problem. It looks like we
 25 covered some of them. So, just to clarify, who

1 was responsible to make sure that all employees
2 received the trainings?

3 MS. [REDACTED]: You mean for SHU?

4 MR. [REDACTED]: For the SHU. Who was
5 responsible to make sure that all the SHU
6 employees received mandatory quarterly SHU
7 training?

8 MS. [REDACTED]: The SHU lieutenant.

9 MR. [REDACTED]: Okay.

10 MS. [REDACTED]: And me. And me.

11 MR. [REDACTED]: You?

12 MS. [REDACTED]: Because I scheduled it.

13 MR. [REDACTED]: Okay. And if they are not -
14 if those employees - are not there, when they
15 come back, who is responsible to make sure
16 that, hey, listen, it's taking - they receive
17 the training? I know you mentioned that you
18 make sure that they come back and sign the
19 sheet. But who actually is supposed to give
20 them the training?

21 MS. [REDACTED]: Well, I didn't say that they
22 come back and sign the sheet. I said that,
23 when they come back, they are supposed to
24 complete the training, and then sign the sheet.

25 MR. [REDACTED]: Okay. So, and the SHU

1 because you are back to work, sign off on it,
2 and have the SHU lieutenant provide you the
3 training?

4 MS. [REDACTED]: No.

5 MR. [REDACTED]: Is it standard practice for
6 employees to sign the sheet, even if they never
7 received the training?

8 MS. [REDACTED]: No. It shouldn't be. I
9 don't have them do that.

10 MR. [REDACTED]: Has there been instances,
11 that you are aware of, where an employee was
12 signed the sheet, and that employee never
13 received the training?

14 MS. [REDACTED]: Not that I am aware of.

15 MR. [REDACTED]: This is the first incident
16 you -?

17 MS. [REDACTED]: Well, this is the first time
18 I'm even hearing about any of this, with her.
19 Because I knew she came back to work, and she
20 was supposed to have the training.

21 MR. [REDACTED]: Do you know if she
22 conducted the training or not?

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

24 MR. [REDACTED]: So, you are not even sure
25 if she did or not?

1 lieutenant is responsible to make sure that
2 they get the training?

3 MS. [REDACTED]: Yes.

4 MR. [REDACTED]: Okay.

5 MS. [REDACTED]: And the administrative
6 lieutenant. However, it's not written
7 anywhere. As the administrative lieutenant,
8 that's just what I did. All administrative
9 lieutenants don't do that. Because SHU is SHU.
10 It belongs to the SHU lieutenant. But because
11 we had gotten a bad rating on our previous
12 reviews, pretty much, they had me maintaining
13 all of our paperwork. So, I kept med trips. I
14 kept rosters. I kept daily security
15 inspections. And whatever paperwork that had
16 to do with correctional services, I was
17 responsible for maintaining it. So, this was
18 something that I just maintained on my own, to
19 make sure that it got done. So that, the
20 department, as a whole, when the time came,
21 wouldn't get written up for it.

22 MR. [REDACTED]: Is there a possibility that,
23 when Noel came back to work, you told her, hey,
24 listen, sign off on the paperwork of the sign-
25 in sheet, saying that you received the training

1 MS. [REDACTED]: No. Hmm-mm.

2 MR. [REDACTED]: And being that -.

3 MR. [REDACTED]: But when you spoke with
4 her about the need for her to take the
5 training, tell me a little bit more about that
6 conversation. What did she say?

7 MS. [REDACTED]: She just said, okay. Noel
8 really didn't talk -. Can I -?

9 MR. [REDACTED]: Go ahead.

10 MS. [REDACTED]: Okay.

11 MR. [REDACTED]: Please.

12 MS. [REDACTED]: Oh, okay.

13 MR. [REDACTED]: You know, again, this is
14 -.

15 MS. [REDACTED]: Noel really didn't talk a
16 lot. To any of us. You know what I'm saying?
17 She would come to work, when she would come to
18 work. And she would do whatever it is that she
19 needed to do, but as far as my interactions
20 with her, it was really only during her times
21 of needing some time off, or scheduling. She
22 may have needed to work a different shift, or
23 whatever the case may be. So, we really never
24 actually had long conversations or anything
25 like that. It was always business, like, as it

1 should be. You know what I'm saying?
2 Supervisor to subordinate. And like I said,
3 when she came in that day, if I remember right,
4 it was her first day back.

5 MR. [REDACTED]: That you had a
6 conversation with her?

7 MS. [REDACTED]: Yeah. Because she would
8 have had to give me that letter, saying that
9 she was cleared to be back at work.

10 MR. [REDACTED]: But during that day, is
11 that when she signed these documents?

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

13 MR. [REDACTED]: Okay.

14 MS. [REDACTED]: I'm not sure if it was
15 during that day or not. I talked to her, and I
16 told her she had to complete the SHU training.
17 I do remember saying that to her.

18 MR. [REDACTED]: Okay. Now, this is going
19 to be the last part of the transcript that I
20 read, where I said to Ms. Noel, "And what do
21 you - now that you've experienced this - what
22 do you blame that on? Do you also blame it on,
23 like, poor management, or, like, the lack of
24 manpower? What are your thoughts on that?"
25 Ms. Noel responded, "It's both, but every time

1 something happens, the officers get in trouble.
2 And the problem is, it starts from the top.
3 Because if my supervisor is telling me to
4 falsify documents, and I do it, I'm in trouble.
5 But Lieutenant [REDACTED] got promoted. You
6 understand? Like, the problem starts from the
7 top, and it comes all the way down." So, she
8 maintained, throughout the entire interview -
9 this is now page 449 of the interview --

10 MS. [REDACTED]: Mm-hmm.

11 MR. [REDACTED]: -- this was you. You
12 specifically. So, if you are saying you 100
13 percent didn't do this, why would she say that
14 you were the one? Does she have an axe to
15 grind with you? Is there something -

16 MS. [REDACTED]: We had no problems with each
17 other, that I'm aware of. But again, we
18 didn't, we didn't have regular interactions
19 with each other. Because when she came to
20 work, she was not on my shift. First of all.
21 When she was at work, she barely ever worked
22 the day shift, if I remember. And I was at
23 work during the day shift. If she had an issue
24 on the shift with anything, she wouldn't have
25 come to me.

1 She would have went to the operations or
2 the activities lieutenant. She was injured, if
3 I remember, I think it was her ankle, but I'm
4 not sure what it was. But once she got
5 injured, that's really more when our
6 interactions started with each other, because
7 she was out of work for such a long time. But
8 we didn't have any problems with each other
9 whatsoever.

10 MR. [REDACTED]: So, why do you believe
11 that she would have stated, with such clarity,
12 that you had her sign those documents, as
13 opposed to Lieutenant [REDACTED], who we discussed
14 also, with regarding being the SHU lieutenant?

15 MS. [REDACTED]: Probably because I was the
16 first person that spoke to her about it, and
17 when she came back to work. That would be the
18 only thing that I can think of.

19 MR. [REDACTED]: Okay. Do you think she
20 took it on herself to, then, sign it? After
21 the conversation with you, as opposed to you
22 actually physically handing her the documents?

23 MS. [REDACTED]: No. I didn't give her the -
24 -

25 MR. [REDACTED]: That's --

1 MS. [REDACTED]: -- the forms to sign.

2 MR. [REDACTED]: -- right. That's what
3 I'm saying is, like, do you think, in her mind,
4 you said you needed to conduct the SHU training
5 and sign the form, or something to that effect.
6 Then she took it on herself to just go sign the
7 form, without ever actually taking the
8 training?

9 MS. [REDACTED]: I couldn't answer that, sir.
10 I'm sorry. I don't know what she was thinking.

11 MR. [REDACTED]: Yeah. No. I mean, we
12 just have to -. So, if she is stating this,
13 and if we go to Lieutenant [REDACTED], and he says, I
14 didn't have her sign it, I'm just trying -
15 we're just, we got to try to, you know --

16 MS. [REDACTED]: Because --

17 MR. [REDACTED]: -- as you know, with this
18 investigation, there are a ton of different
19 elements.

20 MS. [REDACTED]: Mm-hmm.

21 MR. [REDACTED]: This is just one of many.

22 MS. [REDACTED]: Mm-hmm.

23 MR. [REDACTED]: But we have to reconcile
24 them.

25 MS. [REDACTED]: Mm-hmm.

1 MR. [REDACTED]: So, you know, all of this
2 will be written up in, like, a, you know, a
3 report and all that. So, it's just one of
4 those things that we have got to make sure that
5 we have, to the best of our ability, a
6 reconciliation for each element, and this has
7 to do with a staff member not receiving the
8 proper training, and also, according to her,
9 being instructed by her supervisor to
10 specifically sign when the supervisor knew that
11 she didn't conduct the training.

12 MS. [REDACTED]: Mm-hmm.

13 MR. [REDACTED]: So, again, just, I do
14 want to emphasize that this is under oath. So,
15 this would be, like, if you were in a court of
16 law.

17 MS. [REDACTED]: Mm-hmm.

18 MR. [REDACTED]: That you are confident
19 with your statements.

20 MS. [REDACTED]: Mm-hmm. Yes. I don't -
21 like I said - I don't recall having her sign
22 anything.

23 MR. [REDACTED]: Okay.

24 MS. [REDACTED]: Because I wouldn't have done
25 that. I told her she had to complete the

1 these forms, and I had them in the binder. And
2 I do not, at no time, remember telling her to
3 sign anything that she didn't do the training
4 for.

5 MR. [REDACTED]: And did she, would she
6 have had the ability to - sorry, the ability -
7 to obtain those sign-in sheets from your binder
8 --

9 MS. [REDACTED]: No.

10 MR. [REDACTED]: -- and sent them herself?

11 MS. [REDACTED]: No.

12 MR. [REDACTED]: No. She couldn't have
13 done that?

14 MS. [REDACTED]: No.

15 MR. [REDACTED]: So, either yourself or
16 Lieutenant [REDACTED] would have had to have actually
17 obtained those sheets, and asked her to sign?

18 MS. [REDACTED]: Yes.

19 MR. [REDACTED]: So, one of the two of you
20 had to have actually had her sign those forms?

21 MS. [REDACTED]: Yes.

22 MR. [REDACTED]: And that just goes back
23 to the confusion of, why would she specifically
24 say you, and - again, throughout - with such
25 clarity, as opposed to Lieutenant [REDACTED]?

1 training. Now, once she left my office and
2 once she got up in SHU, and got with the SHU
3 lieutenant, I don't know if the training was
4 ever completed.

5 MR. [REDACTED]: Right.

6 MS. [REDACTED]: I wouldn't know that.

7 MR. [REDACTED]: At --

8 MS. [REDACTED]: I wouldn't.

9 MR. [REDACTED]: -- at the time, though,
10 on June 26th, 2019, would have this sign-in
11 sheet been in that folder that you referred to?

12 MS. [REDACTED]: Yes. It would have been in
13 that binder that I had. It should have been,
14 anyway, because --

15 MR. [REDACTED]: All right.

16 MS. [REDACTED]: -- again, once the SHU
17 lieutenant completed the training, and got both
18 of the sheets back from the chief psychologist,
19 then they would bring me the sheets, and then I
20 would put them in the binder. So, these other
21 people that did their training, he had them
22 sign off the sheet that we already have from
23 the 6th. And then, he knew where the binder
24 was. And again, I'm not saying that he did
25 anything at all. [REDACTED], I'm saying. But I kept

1 MS. [REDACTED]: I don't know. I do not
2 know. And to be honest with you, if she spoke
3 to [REDACTED] about it, and whatever transpired
4 between the two of them, as far as the training
5 is concerned, I don't know. But she did sign
6 that form on her own, and she wasn't forced to
7 do it, and I didn't threaten her with program
8 review. I did explain to her that everybody
9 that was in SHU had to complete that training,
10 so that we wouldn't get written up for program
11 review.

12 MR. [REDACTED]: And when you had that
13 conversation with her, were either the binder,
14 were those sheets on your desk?

15 MS. [REDACTED]: No. Not that I -. No. Not
16 that I remember.

17 MR. [REDACTED]: Okay. So, it wasn't,
18 like, you know, this sheet, this sign-in sheet
19 is here, and you were just having this
20 conversation, like, you know, not telling her
21 sign here, date here, but saying, like, you
22 need to complete this training, and it would be
23 sitting right there for her to sign?

24 MS. [REDACTED]: No. I would have told [REDACTED]
25 she's back, she got to do the SHU training.

1 MR. [REDACTED]: Okay. And did she sign
 2 either of these training documents that are on
 3 the table, in your presence?
 4 MS. [REDACTED]: No. Not that I -. No. Not
 5 that I recall, she didn't. No.
 6 MR. [REDACTED]: Okay. Sorry. Go ahead.
 7 MR. [REDACTED]: No problem. Now, this
 8 training takes about four hours?
 9 MS. [REDACTED]: It's set up for four hours.
 10 It doesn't have to be four hours. Maybe the
 11 SHU lieutenant can go over everything with him,
 12 and then, they will go up to SHU, do shake
 13 downs, or whatever. But it's set for a four-
 14 hour block, and that's in case somebody comes
 15 in late, or whatever.
 16 MR. [REDACTED]: But you should at least take
 17 two hours, three hours, to go over all the
 18 material?
 19 MS. [REDACTED]: Well, not necessarily.
 20 Because if she - and I'm sorry, I said - if she
 21 was coming back to work, he could have just had
 22 her review the slide show. You know what I'm
 23 saying? Everything else, the only thing that
 24 is actually required that they do is the slide
 25 show. Everything else is kind of just us

1 next set of questions. I mean, there is one,
 2 two, three, four, five, six people that came
 3 back. And if the lieutenant had to sit down
 4 with them, that's quite a bit of time.
 5 MS. [REDACTED]: Mm-hmm.
 6 MR. [REDACTED]: That he would have to spend
 7 doing the trainings all over again.
 8 MS. [REDACTED]: Mm-hmm.
 9 MR. [REDACTED]: Is there a possibility he
 10 would have said, hey, listen, I'll do it for
 11 all the employees, together, when they come
 12 back, and just pushed off to training?
 13 MS. [REDACTED]: I couldn't -. I don't think
 14 so.
 15 MR. [REDACTED]: No, I would say --
 16 MR. [REDACTED]: Or he would have just handed
 17 -.
 18 MR. [REDACTED]: -- no, it's, they dated
 19 it on the date they are saying that they did
 20 the training.
 21 MR. [REDACTED]: Unless they were instructed,
 22 hey, sign off on the paperwork, and -. Or do
 23 you think Lieutenant [REDACTED] actually just sent
 24 them an email, or told them go on the shared
 25 drive, pull up the slides, and just read it.

1 adding to it. They got to do the slide show.
 2 And they're supposed to do the suicide
 3 prevention training. And psych does the
 4 suicide prevention training.
 5 MR. [REDACTED]: Now, the slide show, would he
 6 have manually handed it to her, or is that
 7 something he would have emailed her?
 8 MS. [REDACTED]: He wouldn't have to email
 9 that to her. She can login it on her own.
 10 It's in the - well, at the time, it was, it's
 11 called Blue (Phonetic Sp. *00:46:13) now. The
 12 training site for the courses. But I'm not
 13 sure, then, if they were using Blue. I think
 14 it was just in the G-drive for annual training.
 15 Saved in the computer, on the - for annual
 16 training.
 17 MR. [REDACTED]: On, like, the shared drive?
 18 MS. [REDACTED]: Yes. They had an annual
 19 training folder that had, you know, everything,
 20 all of the slide shows and stuff in it. So,
 21 the people who would have come back to work,
 22 they should have reviewed that, at least, and
 23 that would have sufficed for them having the
 24 training.
 25 MR. [REDACTED]: So, that was going to be my

1 MS. [REDACTED]: I don't know. I couldn't --
 2 MR. [REDACTED]: Okay.
 3 MS. [REDACTED]: -- answer for what he did.
 4 MR. [REDACTED]: But that's not something you
 5 would instruct them? That would be Lieutenant
 6 [REDACTED]?
 7 MS. [REDACTED]: Yeah. I don't -. I don't
 8 do it at all. I don't do the training for
 9 them.
 10 MR. [REDACTED]: Okay.
 11 MR. [REDACTED]: And who was actually -.
 12 So, you said both of you, though, are
 13 responsible to ensure that the training was
 14 conducted?
 15 MS. [REDACTED]: Well, it depends, as far as
 16 I am concerned, I only was responsible for it
 17 because I just made sure it got done. The
 18 person who is supposed to make sure it gets
 19 done is the SHU lieutenant.
 20 MR. [REDACTED]: Mm-hmm.
 21 MS. [REDACTED]: Who, and that changes
 22 quarterly. So, whoever that lieutenant is, or
 23 whoever that lieutenant was, that is who would
 24 be responsible for doing the training.
 25 MR. [REDACTED]: Okay.

1 MR. [REDACTED]: Based on your education
 2 experience, is there anything wrong with
 3 employees signing documents, stating they have
 4 received training when they have not?
 5 MS. [REDACTED]: Yeah. They shouldn't do
 6 that. That's lying.
 7 MR. [REDACTED]: Just, is there anything that
 8 could go wrong? Like, let's say they didn't
 9 receive training, they go in and they are
 10 supposed to do their duties as certain way, and
 11 they don't do it. Would the training - based
 12 on your training and experience, education --
 13 MS. [REDACTED]: Mm-hmm.
 14 MR. [REDACTED]: -- experience.
 15 MS. [REDACTED]: Mm-hmm.
 16 MR. [REDACTED]: What could go wrong? If they
 17 go -. Like, Noel, that was her first time in
 18 the SHU?
 19 MS. [REDACTED]: No.
 20 MR. [REDACTED]: She had it previously?
 21 MS. [REDACTED]: She worked up there because
 22 she would work overtime sometimes up there.
 23 People who work over, like I said before,
 24 everybody doesn't get it. It's only the people
 25 who are assigned to be up there. And she would

1 MR. [REDACTED]: So, regardless, if she
 2 did these specific trainings, would have she
 3 had at least taken those trainings during
 4 annual refresher training?
 5 MS. [REDACTED]: Yes.
 6 MR. [REDACTED]: Okay. So, at least in
 7 2019, these trainings would have been conducted
 8 by Ms. Noel?
 9 MS. [REDACTED]: Yes. They should have been.
 10 MR. [REDACTED]: You know, not these
 11 specific ones, but she has already said she
 12 didn't take those trainings.
 13 MS. [REDACTED]: Mm-hmm.
 14 MR. [REDACTED]: But she did take annual
 15 refresher training. So, she would have at
 16 least received the trainings that were
 17 discussed during those two trainings?
 18 MS. [REDACTED]: Yes. Annual refresher
 19 training is at the beginning of the year.
 20 MR. [REDACTED]: Okay. *00:50:03)
 21 MS. [REDACTED]: Every year. And I don't
 22 remember when she went out on her injury.
 23 MR. [REDACTED]: In this case, the annual
 24 refresher training was around March.
 25 MS. [REDACTED]: Okay.

1 work up there, just as a regular workday
 2 sometimes, before she went out on her injury.
 3 Or sometimes, overtime. So, that wasn't her
 4 first time working in SHU.
 5 MR. [REDACTED]: But her first bid for the
 6 SHU, was that a bid for the SHU? Like, where
 7 she -. I know she did overtime, and she did,
 8 she was assigned. But was she actually
 9 assigned to the SHU, prior to this, based on
 10 your knowledge?
 11 MS. [REDACTED]: I don't remember. Because
 12 if I can remember when she started, I could
 13 probably be able to answer that, but I don't
 14 remember when she started. I don't.
 15 MR. [REDACTED]: Now, on these two
 16 trainings - the mandatory quarterly SHU
 17 training and the suicide prevention training -
 18 are those trainings also covered in the annual
 19 refresher training?
 20 MS. [REDACTED]: They're separate.
 21 MR. [REDACTED]: But what I mean is, so,
 22 this is, it looks like these are separate, but
 23 are those topics also covered in annual
 24 refresher training?
 25 MS. [REDACTED]: Yes. They are.

1 MR. [REDACTED]: Does that sound right?
 2 MS. [REDACTED]: Yeah. Around February or
 3 March. Yeah.
 4 MR. [REDACTED]: Okay.
 5 MS. [REDACTED]: But again, I don't remember
 6 when she went out on her injury.
 7 MR. [REDACTED]: The interview said she was
 8 off in March. The end of March to June.
 9 MR. [REDACTED]: Yeah. I'm not sure about
 10 it. I'm pretty sure she - you know that she
 11 took the annual refresher training. So, just
 12 point being, she should have at least been
 13 trained on SHU training, as well as suicide
 14 prevention?
 15 MS. [REDACTED]: Yes.
 16 MR. [REDACTED]: Okay. And if someone
 17 doesn't, is out during the annual refresher
 18 training, what happens in those instances?
 19 MS. [REDACTED]: When they come back to work,
 20 they have videos sometimes, and they will video
 21 the training for people that missed, or we have
 22 makeup days for, if she comes back within that
 23 meet of the makeup time, then she will do it
 24 then, along with other staff members, who may
 25 have missed it, or sometimes, if it's just one

1 or two people, and there wasn't a video for
2 them to watch, then HR will shoot them an email
3 and let them know they got to go on, and log-
4 in, and take a look at the slide shows or
5 whatever the case may be.

6 MR. [REDACTED]: Okay. Now, in this
7 instance, it says, do you remember having a
8 conversations with Ms. Noel regarding these
9 trainings? Do you know she needed to do annual
10 refresher training, or if she took it that
11 year?

12 MS. [REDACTED]: I don't remember because I
13 don't remember, like, what you guys are saying,
14 she went out around March --

15 MR. [REDACTED]: Yeah.

16 MS. [REDACTED]: -- I don't know, because
17 most of the time --

18 MR. [REDACTED]: (Indiscernible *00:51:29)
19 her.

20 MS. [REDACTED]: -- we would start annual
21 training in, like, February, like, the end of
22 January, around February. But I don't
23 remember. She would have been scheduled for it
24 on the daily rosters. On the quarterly
25 rosters. Not quarterly. The daily rosters.

1 responsible for annual, making sure that
2 everybody completes it. I'm responsible for
3 scheduling everybody to go.

4 MR. [REDACTED]: Okay. But in this
5 instance, under these, you are responsible for
6 making sure that they complete the quarterly
7 SHU training and the suicide prevention?

8 MS. [REDACTED]: The SHU lieutenant is
9 responsible. All I do is schedule it.

10 MR. [REDACTED]: Right. But I guess, why
11 would it have then, if he's responsible, why
12 would have you had to have that conversation
13 with Ms. Noel, and she got to make sure that
14 she does that SHU training?

15 MS. [REDACTED]: Because when we would
16 schedule the training, when people would be
17 out, as they trickle back in, we have to be
18 cognizant, and make sure that they took the
19 training, and signed for it. Because all of
20 them had to do because it they were signed for
21 it on the quarterly roster.

22 MR. [REDACTED]: Okay. So, that just goes
23 back to when you said not only take it, but
24 also sign for it.

25 MS. [REDACTED]: Mm-hmm.

1 So, I don't remember if she went or not.
2 Because again, like I said, I don't remember
3 when she went out.

4 MR. [REDACTED]: And it sounds like you
5 did remember her not -. You did remember her
6 needing to do this, though. So, what would
7 make you remember that versus an annual
8 refresher?

9 MS. [REDACTED]: No. I don't remember when
10 she went to annual refresher, or if she did.
11 Because this happened when she returned to work
12 from her injury:

13 MR. [REDACTED]: Mm-hmm.

14 MS. [REDACTED]: So, annual refresher
15 training would have happened way, a while
16 before that.

17 MR. [REDACTED]: So, I guess my point
18 being is, like, you were aware of when she came
19 back from her injury, that she had to do these.
20 So, if she had missed the annual refresher,
21 would you have also been aware that she needed
22 to do the annual refresher training?

23 MS. [REDACTED]: Right. But that part of it
24 wouldn't have been me. That would have been HR
25 that would have got with her. Because HR is

1 MR. [REDACTED]: How do you ensure that
2 they sign for it?

3 MS. [REDACTED]: The SHU lieutenant has them
4 sign for it. When they do this training, I'm
5 not there. He has the sign-in sheets, and he
6 has them sign in that they completed the
7 training on the day that they do the training.

8 MR. [REDACTED]: Mm-hmm.

9 MS. [REDACTED]: I just stored the sheets.

10 MR. [REDACTED]: Okay.

11 MS. [REDACTED]: In my office.

12 MR. [REDACTED]: And can you recall any
13 instance where you actually retrieved the sheet
14 and had an employee sign, that they did
15 training?

16 MS. [REDACTED]: No.

17 MR. [REDACTED]: No? So, that's just not
18 something you would do?

19 MS. [REDACTED]: No. Because the SHU
20 lieutenant was responsible for that.

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

22 MS. [REDACTED]: I just kept up with when
23 they came back to work. You know what I'm
24 saying? And on the time that they came back to
25 work, if they, if it was something that they

1 were missing or whatever, even for, like,
2 firearms training, it's the same thing. When
3 they come back, I will coordinate it with Human
4 Resources, to get them out to the range, so
5 that they can go in SHU.

6 MR. [REDACTED]: Okay. But you would
7 never have them sign that they did it?

8 MS. [REDACTED]: No.

9 MR. [REDACTED]: That's for any training?

10 MS. [REDACTED]: Any training.

11 MR. [REDACTED]: Okay.

12 MR. [REDACTED]: Have there been situations
13 where training was not -. Was to be -. Sorry.
14 I will repeat that. Have there been situations
15 where training was to be provided for
16 employees, however, there were no trainers, and
17 an employee never received the training they
18 were supposed to?

19 MS. [REDACTED]: Not that I am aware of.

20 MR. [REDACTED]: So, there's always trainers
21 available?

22 MS. [REDACTED]: Every lieutenant is an
23 instructor, for what, you know, different
24 things involving correctional services. So,
25 there would never be an instance where there is

1 MS. [REDACTED]: Well, Human Resources would.
2 If it was annual training, Human Resources
3 would be responsible for scheduling another
4 trainer to come in. Just like when we have new
5 classes that start, Human Resources does the
6 agenda, the training courses, and they outline
7 who is going to teach what, on what day, what
8 block, what time, and they send that out to us,
9 to all of the instructors, to make sure that we
10 are there. As far as SHU training is
11 concerned, we wouldn't schedule SHU training if
12 there wasn't a SHU lieutenant available to do
13 the SHU training. So --

14 MR. [REDACTED]: Okay.

15 MS. [REDACTED]: -- we coordinate it with the
16 SHU lieutenant, to say, okay, the quarter is
17 going to start on this day, what day do you
18 want me to schedule your training? That's what
19 I would do, so that that person knew that they
20 would be there to conduct the training.

21 MR. [REDACTED]: And you have never heard of
22 trainers never showing up, or people actually
23 not receiving the training?

24 MS. [REDACTED]: No.

25 MR. [REDACTED]: Okay. Anything else on the

1 not a trainer. They have -. And even during
2 annual refresher training - excuse me - they
3 have people that come from different
4 departments, that train, you know, on different
5 subjects. And then, they have backup people
6 for those people.

7 MR. [REDACTED]: So, not -. Should there be a
8 situation where we talk to a C.O. and the C.O.
9 says, yeah, I went to that, I went there, I
10 signed in, I sat there, but no one was ever
11 there to teach us the class, or no one is ever
12 there to - sometimes wasn't there to actually
13 conduct the training, so they never received
14 the training.

15 MS. [REDACTED]: That shouldn't be an
16 instance. No.

17 MR. [REDACTED]: Would that be something that
18 you would be made aware of, if someone -?
19 Let's say you scheduled a trainer to come in
20 and teach the class. Would you be aware if the
21 trainer never showed up, or whether there was a
22 conflict --

23 MS. [REDACTED]: Yes.

24 MR. [REDACTED]: -- who would be responsible
25 to schedule another trainer?

1 training? Because I'm going to jump --

2 MR. [REDACTED]: Yeah. Please do.

3 MR. [REDACTED]: -- okay. Did you have any
4 interactions with inmate Jeffrey Epstein during
5 his time at the MCC?

6 MS. [REDACTED]: No.

7 MR. [REDACTED]: Were you working during the
8 incident between Epstein and inmate Tartaglione
9 on July 23rd, 2019?

10 MS. [REDACTED]: The --

11 MR. [REDACTED]: Do you know who Tartaglione
12 is?

13 MS. [REDACTED]: That was his roommate in
14 SHU. No. I wasn't. No. Because I normally
15 work the day shift, and I believe that incident
16 in the evening, or the midnight shift, or
17 something.

18 MR. [REDACTED]: Okay. What was your
19 understanding about Epstein being required to
20 be housed with a cellmate? Did you know that
21 he was required to be housed with a cellmate?

22 MS. [REDACTED]: When he came off of watch -
23 suicide watch - the first, that first time,
24 then psychology, I believe it was Dr. [REDACTED], if
25 I remember right, she - they will send us out

1 an email to let us know this inmate is coming
 2 off watch, he needs to be celled with a
 3 cellmate.
 4 MR. [REDACTED]: And your understanding is,
 5 Mr. Epstein had to be celled with a cellmate?
 6 MS. [REDACTED]: Yes. Now, if it changed,
 7 because that was my understanding when he first
 8 came off of watch, and if I'm not mistaken, I
 9 think it may have been in July, I think it was,
 10 I'm not sure, when he came off of watch that
 11 first time. But she said he needed to have a
 12 Bunkie that - I'm sorry, a roommate - then.
 13 Now, after that, I have no idea if that
 14 changed.
 15 MR. [REDACTED]: Do you know who was chosen to
 16 be his cellmate?
 17 MS. [REDACTED]: No. I do not.
 18 MR. [REDACTED]: Okay. Anything? Were you
 19 working on August 9th and 10th, 2019?
 20 MS. [REDACTED]: I don't -. Was that the day
 21 of his suicide?
 22 MR. [REDACTED]: August 10th was when they
 23 found him.
 24 MS. [REDACTED]: Okay. I was in Indiana. My
 25 dad had had a stroke.

1 record?
 2 MS. [REDACTED]: No.
 3 MR. [REDACTED]: Okay.
 4 MS. [REDACTED]: No, sir.
 5 MR. [REDACTED]: Is there anything you
 6 would like to add that we haven't discussed?
 7 MS. [REDACTED]: No, sir.
 8 MR. [REDACTED]: Is there anything else
 9 that you wanted before?
 10 MR. [REDACTED]: No. Just ask --
 11 MR. [REDACTED]: Oh.
 12 MR. [REDACTED]: -- these documents, because
 13 we showed them to you, you are not testing
 14 what's on it, you are just contesting that
 15 these are the documents we showed. Can you
 16 initial and put today's date on it? On the top
 17 --
 18 MR. [REDACTED]: You need --
 19 MR. [REDACTED]: -- of each document.
 20 MR. [REDACTED]: Yeah. The top would be
 21 great.
 22 MS. [REDACTED]: These two?
 23 MR. [REDACTED]: No. Well, not this first
 24 one, but I think this -. So, some of these can
 25 - or some of these, do they go with this?

1 MR. [REDACTED]: I'm sorry.
 2 MR. [REDACTED]: I'm sorry to hear that.
 3 MS. [REDACTED]: And I saw it on TV. That's
 4 how I was - I was in his hospital room with
 5 him, and I saw it on TV - that's how I found
 6 out.
 7 MR. [REDACTED]: So, you weren't there August
 8 9th and 10th?
 9 MS. [REDACTED]: No.
 10 MR. [REDACTED]: Okay. Do you think Epstein
 11 took his own life?
 12 MS. [REDACTED]: Yes, I do.
 13 MR. [REDACTED]: Why?
 14 MR. [REDACTED]: Do you have any reason to
 15 believe that he didn't take his own life?
 16 MS. [REDACTED]: That he didn't take his own
 17 life?
 18 MR. [REDACTED]: Yeah.
 19 MS. [REDACTED]: No, I don't.
 20 MR. [REDACTED]: Okay. Do you have -.
 21 Are you comfortable with all the answers that
 22 you provided today?
 23 MS. [REDACTED]: Yes, I am.
 24 MR. [REDACTED]: Is there anything you
 25 would like to revise while we are still on the

1 MS. [REDACTED]: This is the slide show I was
 2 talking about.
 3 MR. [REDACTED]: Okay. So, is this
 4 suicide, the suicide training, and this one is
 5 the SHU quarterly training?
 6 MS. [REDACTED]: Yeah.
 7 MR. [REDACTED]: Okay. So, if you can
 8 just keep those with each other.
 9 MS. [REDACTED]: Okay.
 10 MR. [REDACTED]: And then, yeah, just sign
 11 the sign-in sheets on the top, if you don't
 12 mind.
 13 MR. [REDACTED]: So --
 14 MR. [REDACTED]: Or initial and date.
 15 MR. [REDACTED]: -- initial and today's date
 16 is the 27th.
 17 MR. [REDACTED]: So, 10/27/2021. And
 18 again, that's just to -. Like, we have to
 19 attach it to the record, saying that these are
 20 the actual sheets that we reviewed. And if you
 21 don't mind --
 22 MS. [REDACTED]: These two?
 23 MR. [REDACTED]: -- I guess --
 24 MR. [REDACTED]: Those two, yeah.
 25 MR. [REDACTED]: -- yeah.

1 MS. [REDACTED]: Okay.
 2 MR. [REDACTED]: Training, and the slide
 3 shows. But those slide shows are for each
 4 respective training?
 5 MS. [REDACTED]: Oh, this is suicide
 6 prevention for Special Housing Unit.
 7 MR. [REDACTED]: Right. So, that would be
 8 this one. Correct? With Dr. [REDACTED] on the
 9 top.
 10 MS. [REDACTED]: This is the same thing.
 11 It's just a different -. No, it's not. It's
 12 just a different -. This is a different
 13 version of this.
 14 MR. [REDACTED]: Okay. So, they are both
 15 suicide prevention. Neither of them are the
 16 quarterly SHU trainings?
 17 MS. [REDACTED]: No.
 18 MR. [REDACTED]: Okay. Great.
 19 MR. [REDACTED]: This one is the first --
 20 MS. [REDACTED]: No. None of --
 21 MR. [REDACTED]: -- after that.
 22 MR. [REDACTED]: Okay.
 23 MS. [REDACTED]: -- neither one of these is
 24 the quarterly SHU training.
 25 MR. [REDACTED]: Okay. Perfect. Thank

1 you so much. It is currently 12:25 p.m., on
 2 Wednesday, October 27th, 2021. This is Senior
 3 Special Agent [REDACTED] [REDACTED], and I am
 4 turning off the recorder.
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CERTIFICATE

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

Interview of [REDACTED] [REDACTED]

Brianna Rose Burton, Transcriber