

1 Alright. DO you know where we left off [REDACTED]?

2 What was the last question that we asked?

3 [REDACTED]: It was what we asked for  
4 (Indiscernible \*00:24:53) about the injuries.

5 [REDACTED]: Okay. So you were  
6 telling us you said March through June you were  
7 injured?

8 MS. NOEL: Yes.

9 [REDACTED]: And you were not actually  
10 working during that time?

11 MS. NOEL: No.

12 [REDACTED]: Do you remember around  
13 when in March and when did it end? Was it the  
14 beginning of March, end of March, middle?

15 MS. NOEL: Um I'm not sure. I just know  
16 it was March.

17 [REDACTED]: Sometime in March?

18 MS. NOEL: Yes.

19 [REDACTED]: But when you came back,  
20 was it around the 26th when they asked you to  
21 sign those?

22 MS. NOEL: I came back in June. I don't  
23 recall the date exactly.

24 [REDACTED]: Okay.

25 MS. NOEL: But I remember the day I came

1 into work and the lieutenant asked me to go see  
2 Lieutenant [REDACTED]. And she asked me to sign  
3 and I said but I wasn't here. I was out on an  
4 injury. And she said she's aware but they need  
5 me to sign it for program review.

6 [REDACTED] Okay.

7 MS. NOEL: So I signed.

8 [REDACTED]: So both trainings when  
9 you signed, they didn't actually even provide  
10 you anything?

11 MS. NOEL: No.

12 [REDACTED]: Verbally?

13 Electronically? Nothing?

14 MS. NOEL: No.

15 [REDACTED]: Okay. And that was on  
16 the date that was signed that that happened?

17 MS. NOEL: Actually she told me not to  
18 date it. I remember when I was signing, she  
19 said don't date it.

20 [REDACTED]: But you dated it anyway?  
21 Did you have a conversation about that?

22 MS. NOEL: No.

23 [REDACTED]: After you dated it, she  
24 didn't say why did you date it or anything like  
25 that?

1 MS. NOEL: No.

2 [REDACTED]: Okay. Did you receive  
3 that training though in the annual training  
4 courses as well? Like the suicide prevention  
5 or the - you know how to operate in the SHU  
6 during MCC annual? Or the - I think you call  
7 it the IF training? Or during the correctional  
8 officer training at FLETC?

9 MS. NOEL: Those trainings are like  
10 general overall training. It's not  
11 specifically speaking about SHU. Like SHU may  
12 come up in the conversations, but it's not  
13 specific to SHU or how to operate or run the  
14 SHU.

15 [REDACTED]: Okay.

16 MS. NOEL: Mm-hmm.

17 [REDACTED]: Do you know if they were  
18 doing this with other employees as well?  
19 Having them sign training that they weren't  
20 actually conducting?

21 MS. NOEL: I don't know.

22 [REDACTED]: Okay. But did you do  
23 this per the direction of your supervisor?

24 MS. NOEL: Supervisor. Yes.

25 [REDACTED]: So she - did she

1 specifically you must sign this?

2 MS. NOEL: Yes.

3 [REDACTED]: Okay. And again, that  
4 was [REDACTED]

5 MS. NOEL: [REDACTED]

6 [REDACTED]: [REDACTED]. And you said -  
7 and I apologize. I don't know if we were  
8 interrupted when -. Where did you say she is  
9 currently?

10 MS. NOEL: She is in Jersey I know. I'm  
11 trying to -.

12 [REDACTED]: At the FCI Fort Dix?

13 MS. NOEL: Yes.

14 [REDACTED]: Okay.

15 MR. FOY: Question real quick.

16 [REDACTED]: Absolutely. Do you want  
17 a more precise answer to when she was out and  
18 when she came back?

19 [REDACTED]: Uh, so far -.

20 MR. FOY: Because I happen to know --

21 [REDACTED]: Oh sure. If you'd like.

22 MR. FOY: -- the approximate dates.

23 [REDACTED]: Sure. You can provide  
24 that.

25 MR. FOY: And this is based on my review

1 of discovery and conversations with Ms. Noel.  
2 We're looking at about March 15 to June 24-ish.

3 [REDACTED]: Okay.

4 MR. FOY: And I note that the execution  
5 was on the 26th. But I think there was some  
6 time, you know, it's not like the first minute  
7 she was there they had her sign the document.

8 [REDACTED] Okay.

9 MS. NOEL: Right.

10 MR. FOY: So those are the estimated  
11 times. I could be off by a day or two, but -.

12 [REDACTED] Perfect.

13 MR. FOY: The 15th of March to June 24th.

14 [REDACTED]: And thank you attorney  
15 Foy.

16 MR. FOY: No problem.

17 [REDACTED]: During your time at the  
18 MCC, how often were you assigned to the special  
19 housing unit also known as the SHU?

20 MS. NOEL: Mm.

21 [REDACTED]: And this is an  
22 approximate. I'm not asking you for like exact  
23 amount.

24 MS. NOEL: When I came back from the  
25 injury, my assignment was the SHU. So from

1 June 20-whatever to August 10th, I worked the  
2 SHU.

3 [REDACTED]: Okay. And that was your  
4 quarterly assignment was in the SHU from - for  
5 that whole summer --

6 MS. NOEL: Yes.

7 [REDACTED]: -- in 2019?

8 MS. NOEL: Yes.

9 [REDACTED]: Okay. Thank you. So I  
10 know that you said that you didn't - they  
11 didn't provide you with the SHU training. Did  
12 they provide you with the policies of the SHU?

13 MS. NOEL: No.

14 [REDACTED]: So you never received  
15 those policies? Would it have been when you  
16 received and you said you had to initial and  
17 date something electronically? I think you  
18 said when you provided -?

19 MS. NOEL: That's the employee code of  
20 conduct.

21 [REDACTED]: Okay.

22 MS. NOEL: That's the - like the handbook  
23 that's online.

24 [REDACTED]: Should have they provided  
25 you with the polices and post orders in the

1 SHU?

2 MS. NOEL: In the SHU there is post  
3 orders.

4 [REDACTED]: Oh, okay. So in the SHU  
5 there's the post orders.

6 MS. NOEL: Yes.

7 [REDACTED]: And were you provided a  
8 copy of that to review?

9 MS. NOEL: Yes.

10 [REDACTED]: And had you reviewed  
11 that?

12 MS. NOEL: Yes.

13 [REDACTED]: Okay. And when did you  
14 review that?

15 MS. NOEL: When I came back.

16 [REDACTED]: So sometime in that June  
17 --

18 MS. NOEL: So in June.

19 [REDACTED]: -- or July timeframe?

20 MS. NOEL: Yes.

21 [REDACTED]: Okay. So aside from those  
22 post orders, did you receive any other SHU  
23 training?

24 MS. NOEL: No.

25 [REDACTED]: No. And who was