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Q=Sgt. Tarazi
Q1=Sgt. (Dennis Owens)
A=Deputy Rivera

Q: Interview with Deputy Rivera, September 3, 2015. 6:46 pm. Sheriff's Office headquarters. Hello?

A: Hi.

Q: How are you?

A: I'm good. I have my allergies. They're killing me today.

Q: Oh man. Claritin?

A: Uh, Zyrtec.

Q: Zyrtec? Well thank you for coming. I appreciate it. So you were working overtime?

A: I was working overtime.

Q: Okay. I was super, yeah. So I thought everyone was, uh, was DTed. Because they told me you were DTed.

A: Yeah.

Q: So I thought I was like, oh, everyone will be here today. Right?

A: No, no.

Q: Like, no, they're CTed.

A: Yeah.

43

44 Q: After you. Just go to the right. Have you been up here before?

45

46 A: Yeah. Yeah, I have.

47

48 Q: Okay.

49

50 A: I just - I have no sense of direction.

51

52 Q: All good. I just don't know a lot of - a lot of people.

53

54 A: Yeah, I know. A lot going on, huh?

55

56 Q: This is Sergeant (Owens). I'm not sure if you know him.

57

58 A: No, I don't.

59

60 Q: (Dennis Owens).

61

62 A: Great to meet you.

63

64 Q: Come on.

65

66 Q1: I've seen you at (Elwood) before.

67

68 A: Yeah, I'm sure you have.

69

70 Q: We're just gonna go into this room right here. All right.

71

72 Q1: Where do you want to sit? That one right there?

73

74 Q: Whatever. It doesn't matter. Okay. Um, okay. Well thank you for coming. I
75 really appreciate it. Uh, just so you know, I'm uh, my name is Sergeant Tarazi.
76 I'm a detective. This is (Dennis Owens). He's a Sergeant. Uh, we're criminal
77 investigators. We're not on internal affairs.

78

79 A: Okay.

80

81 Q: Um, so that being said, you don't have to talk to us if you don't want to. You're
82 free to leave at any time. Um, and everything that you tell us is a voluntary
83 statement that you want. Always tell that to everyone who comes here.

84

85 A: Okay.
86
87 Q: Um, if you wanna leave, just let us know, and we'll walk you out. Um, that
88 being said I'm sure you know why we want to talk to you.
89
90 A: Yeah.
91
92 Q: Um, can you just briefly tell us what you know about why we're here to talk?
93 And then...
94
95 A: Um, I was working overtime on CT and, uh, I was working at as the R20
96 position. I was taking (unintelligible) and...
97
98 Q1: Can you kinda explain the position when you say R20?
99
100 A: Uh, the Rover position.
101
102 Q1: Okay.
103
104 A: Um, for the W2 building. Uh, you take releases and transport inmates in and
105 out, um, of the - into the facility from processing to CCW or where they're
106 gonna be housed. Or you take 'em to the processing to get released.
107
108 Q: Okay.
109
110 A: Um, uh, I'm taking it is because I was working overtime on C Team and there
111 was an incident that happened in the dress-out room. I was very
112 uncomfortable with the situation. And so I felt it necessary to go ahead and
113 talk to the sergeants about it because I was frustrated with what had happened.
114
115 Q1: Which sergeants did you talk to?
116
117 A: I talked to Sergeant Sevillano and Sergeant Liddle. They were both on
118 overtime.
119
120 Q1: (Eric Little) or (Robert)?
121
122 A: (Robert).
123
124 Q1: Okay.
125
126 A: All right.

127

128 Q: So why don't we talk about, um, what you were uncomfortable with, what you
129 saw, like kind of the moments leading up to the incident, and then what
130 happened during the incident and what happened immediately after?

131

132 A: Okay. So I - it was barely when we first started, um, I was working overtime,
133 like I said. Um, I was taking a release. I just barely took off her handcuffs
134 when I heard some yelling coming from the dress-out room. And so I looked
135 at everybody that was in processing that was working. Nobody moved but I
136 ran towards the dress-out room. When I go in there, I see, um, Officer
137 (Persard) and, uh, (Simpson Holden). I'm not sure if she's a deputy or if she's
138 just a correctional, so yeah.

139

140 Q1: (Unintelligible) yeah.

141

142 A: Yeah. Um, and they were on the floor with an inmate. Um, they had her
143 pinned down on the ground. So as soon as I ran in Officer (Persard), yells at
144 me and says, "We got this Rivera." Well of course I'm not gonna go ahead and
145 leave. I see my fellow officers.

146

147 Q1: And what was (Persard) - (Persard) in the process of doing when she told you
148 that?

149

150 A: Well, they were pinned down, um, with this inmate. She was in her, um, she
151 wasn't even in her inmate clothing yet. She was in her, you know, her civilian
152 clothing and she was pinned down on the ground. Um, and it looked like they
153 were struggling with her. So I ran out, I grabbed some gloves and the guys
154 that are in processing are still standing there. So, um, Officer (Burden) tells
155 me, "Do you need waist chains?" I said, um, I said, "Probably," but, you
156 know, I ran back in. So I went in and I'm noticing that, oh, he had said, "Well,
157 do you need waist chains, but is she naked?" And I'm like well if you, I mean,
158 my thing is I don't care if she's naked. My partner, if it's a male or female at
159 that point, if you hear your partner screaming or - or whoever is screaming,
160 you don't know if it's your partner or inmate you run in there.

161

162 Q1: Is there any policy or anything that says that male custody staff is not
163 supposed to be around a woman when she's naked?

164

165 A: Um, well there's a policy in regards to, I mean, if they're in a unit and the
166 women are taking off their clothes, you just immediately, you know, address
167 it. But, um, you know, if you work in the position, you're gonna run into some
168 women that are just a little off.

169

170 Q1: Sure.

171

172 A: And they - they do that all the time. Now, if it happens, you know, what are
173 you gonna do? It happens with us as me a female when we work on the men's
174 side.

175

176 Q1: Okay. But you're - they're in the dress-out room, right? Correct?

177

178 A: They're in the dress-out room. Now if you're assisting, I mean, if you are
179 hearing yelling, no, there is no policy that you can't go ahead and - and, uh,
180 respond to, uh, someone that's yelling in the room.

181

182 Q1: Okay.

183

184 A: Yeah. Um, you're supposed to respond to anything, you know.

185

186 Q: So you, uh, you run out and to go get gloves and then what happens?

187

188 A: So I'm running back - I run back in - at - while I'm running back in (Burden)
189 had asked me, um, if, uh, I needed waists chains or, and, uh, I said, "Well I'm
190 not sure." You know, but I was running back in, and he says, "Well is she
191 naked?" I said, "I don't know." 'Cause at the moment she wasn't. But um, I
192 could tell that they were trying to take off her clothes but she - you know,
193 when I ran in the first time she wasn't naked yet. So as I'm going in there, I
194 could see Simpson holding up her legs, and she's trying to pull off her pants.
195 Now mind you in the back of my head, I'm thinking, why the hell are we
196 taking off her clothes? You know? I mean, but you know, okay. I'm seeing
197 them. So I don't know what the situation is. So I'm just assisting my partners.
198 So I grab her, um, right arm, and I'm trying to, you know, control her, and
199 she's yelling, and she's saying, "Why the fuck did you punch me?" You know,
200 and she was addressing (Persard). Um, and so...

201

202 Q: The inmate was saying this?

203

204 A: Yes.

205

206 Q: Okay.

207

208 A: "Why the fuck did you punch me?" You know, and she's yelling and, "You
209 didn't have to fucking do that." You know, and - and, "I didn't do nothing to
210 you. Why are you doing this?" And so okay, again, I'm still just trying to

211 control her. And Simpson-Hogan is pulling off her pants - pulling them off.
212 And I said, "What are you girls doing?" And so they said, "We're gonna try
213 and put her - we're gonna put her inmate clothing on." Now mind you not only
214 did I notice that it was a level one inmate because they were trying to put her
215 stripes on. So she's here for a minor, you know, thing.
216

217 Q: Right.
218

219 A: So I'm thinking to myself, okay, well, I'll deal with this afterwards. Now we
220 gotta deal with this female. Who's, you know, obviously at the point where we
221 have to control her no matter what. So, uh, while in the process we're taking
222 off her clothes and, um, (Persard) puts a boot to her chest to like her stomach
223 area and her chest area right here.
224

225 Q: Mm-hm.
226

227 Q1: Where is the inmate when she is...
228

229 A: She's laying down on the ground, on her back, you know? So she puts a boot
230 to her chest and, um, and it - it - it wasn't very long, but the inmate started
231 saying, "I can't breathe. I can't breathe." You know. And so she - she - she
232 eventually takes the thing, you know, her foot - her foot off. And then, um, the
233 inmate is still struggling. And then just a few seconds later (Persard) puts her
234 hands around her neck, you know, to pin her down. And so I'm thinking to...
235

236 Q1: Doing more of just like a control trying to keep her down, or is it like...
237

238 A: She's going like this, you know. She's pushing her down and the inmate is, "I
239 can't breathe. I can't breathe." You know. So, um, then the, um, we're trying to
240 pull her up at this time to put the shirt on. So we go ahead and - and - and
241 trying to take her arms out of the - her regular shirt - her inmate clothing.
242 We're trying to take the clothes off and, um, we get the shirt off. We're putting
243 the - the other clothing on and then (Persard) grabs her hair and knocks her
244 back to the ground, you know. Just pulls her back. So I'm like, you know, in
245 the background I'm thinking, you know, we've always been told. I mean, I'm a
246 JTO. I've been a JTO for years, you know? So why would we be dressing this
247 female out in the first place without a sergeant being present or giving us
248 permission to go ahead and do this? Why if she was already combative or
249 giving you a problem, why didn't you just wait and put her in the seat and let
250 the sergeant make that call. But you know, I'm already - I'm already
251 committed because I'm in there. Right?
252

253 Q: Sure. Mm-hm.

254

255 A: So I go ahead and, you know, we get her up, we got everything. And, um, we
256 drag her out of the dress-out room. And then that's when (Burden) puts the
257 waist chains on her. And, um, we escort her to one of the - the chairs and the
258 lobby area. And we, um, uh, secure her to the chair. At that point I'm
259 frustrated, and I just leave, you know. I - I left. So, um, I'm thinking to myself,
260 what the hell did, you know, just happened? You know, and so I went in and I,
261 you know, there's a couple of girls that I'm comfortable with. And the two
262 girls that were working in control which was (Gonzalez) and (Jimenez), I said,
263 "Look." They go, "What's wrong?" They could tell that I was upset. And so
264 they go, "What's wrong?" And I go - I go, "I just went - I just came from
265 processing." And I broke down the story to them and - and, um, and, uh, they
266 go, "Well no wonder. Um, Simpson-Hogan," who was the JTO for the C Unit
267 said, "No wonder she left to go ahead and go towards processing." Um, and
268 I...

269

270 Q1: Is Simpson-Hogan hard to work with?

271

272 A: Simpson-Hogan doesn't even work in processing. She was called from C Unit
273 to go to processing.

274

275 Q1: W4C?

276

277 A: Yeah. W4C.

278

279 Q1: Like way the hell over here.

280

281 A: Oh way...

282

283 Q1: Came over here?

284

285 A: She went all the way to processing from W4C. Okay? So she goes to
286 processing and well, the girls were telling me - they said, "Well wonder she
287 took off from - from C Unit to processing. And so we're talking and at the
288 same time, you know, I'm like, you know, what the hell should I do? You
289 know? Cause of course, nobody wants to be put in the position to be called a
290 snitch or, you know, to -- but I was totally uncomfortable with the situation.
291 This inmate was complaining that she couldn't breathe, that she had asthma
292 that, you know, she's being choked. So I'm thinking something happens to this
293 female, you know, we're - we're in trouble, you know? So I'm thinking to
294 myself, the hell with this, you know, and they go, and they're telling me, they

295 go, "Well in all honesty, we, um, Officer (Divine) who works - he's the JTO in
296 processing, um, has addressed an issue that he's had with this specific Officer
297 (Persard) about her use of force issues in processing with the sergeants. And
298 he feels like nothing's being done about it." And so, you know, I'm like okay,
299 well you know what? I feel comfortable because the two sergeants that were
300 on shift was Sergeant Liddle and Sergeant Sevillano. They work on D Team -
301 they're the sergeants on D Team. So Sergeant Liddle was the CCW sergeant
302 and of course, um, Sevillano was the, um, camp and processing sergeant. So,
303 um, I, you know, the girls would tell me, well, you know, "If I were you, I'd
304 go ahead and, you know, talk to the sergeants about it, see what they say, you
305 know?" Um, and so I went to Sergeant Liddle and, um, well right before I left,
306 I went into the JTO office because Sergeant Sevillano had called me and says,
307 "Hey, um, I need you to write an ER." Which was what I anticipated. Um, and
308 I go, "Well look, Sarge. I need you to come over here and speak with me and
309 Sergeant Liddle because I'm really uncomfortable of what happened." And so
310 we went into the office. I had first talked to Sergeant Liddle and broke down a
311 little bit about what had happened and how I felt like a sergeant should have
312 been called first. And, um, instead of us dressing her out. And so, um, I went,
313 and I broke it down for that. Well Sevillano when he came in, he broke down
314 what (Persard) and Simpson-Hogan had said, you know, about the incident.
315 Okay? And so I said, "Well, look, this is..." And he goes, "Well, you know,
316 you can write, you know, exactly what you did, your part in the incident."
317 You know, I go, but...

318
319 Q1: What did Sevillano tell you that what (Persard) did in the past that Simpson
320 said?

321
322 A: He said that, um, the inmate was, uh, uh, disruptive when she came in. That
323 they were saying that the inmate was disruptive, didn't wanna dress out. And
324 so, um, that they went and, uh, took it upon themselves to go ahead and dress
325 her - dress her out. And Sergeant Sevillano had stated to them that the first
326 mistake they did was that, you know, they were dressing her out without
327 calling a sergeant. But, you know, write it down the way they did it, you
328 know? So he told them, "Hey, look, you shouldn't have done that without, you
329 know, addressing it if she was combative, or she was being - giving you a
330 hard time. But you know what, write what you did, and you know, we'll take it
331 from there."

332
333 Q1: So all three of you then wrote ERs for that?

334
335 A: We all wrote ERs, right.

336

337 Q1: Now I'm assuming because the way you're saying there's a procedure in how
338 you do it, um, in processing if somebody's combative and doesn't want to
339 dress out.
340
341 A: Mm-hm.
342
343 Q1: And what - what is it your interpretation of that policy?
344
345 A: Well, you know, I mean, if she's - if - if - if she's aggressive, you try your best
346 just to go ahead and waist chain her, you know, handcuff her and sit her in a
347 chair, call the sergeant and say, "Hey, look, this inmate's giving me a hard
348 time. She's not dressing out. What do you wanna do with her?"
349
350 Q: Let me ask you, is - is there a rush to get 'em dressed out?
351
352 A: No, I mean, if they're combative wait until they calm down and, you know, I
353 mean, why - why would we, I mean, this is - there's a...
354
355 Q: As a general de-escalation...
356
357 A: ...D Team, you know. The unfortunate side to - to the department is that all
358 teams are inconsistent. So the sergeants do different things at different, you
359 know, times. And it's one of the things, the biggest problems we have, you
360 know. One Sergeant on one team will say, "Hey, you know, if someone says
361 they're suicidal, we bring 'em to processing." Next team will say, "Hey, put
362 'em in (unintelligible)." You know - you know, so it's confusing sometimes,
363 but you know, it's an inconsistency.
364
365 Q: Let me ask you this. Um, at the time this was going down in processing, were
366 there any other inmates beside the one you brought in?
367
368 A: I, in all honesty, as soon as I unhook- I took her handcuffs off, I heard the
369 scream and that's when I ran.
370
371 Q: What did you say?
372
373 A: So I injected...
374
375 Q: What happened to that inmate?
376
377 A: You know what, (Burden) and (Divine) must have told her sit down or
378 whatever, because I just ran in.

379

380 Q: Okay.

381

382 A: Yeah.

383

384 Q: Uh, and then, um, originally you said that you - you were unhandcuffing this
385 inmate.

386

387 A: Mm-hm.

388

389 Q: And then you heard a commotion coming from that room.

390

391 A: Right. Mm-hm.

392

393 Q: What did you hear exactly?

394

395 A: I just heard screaming. I didn't know who was in there because I didn't know
396 who was at - I'm on overtime. I didn't know who exactly was working in
397 processing at the time.

398

399 Q: Okay.

400

401 A: So I didn't know if it was an officer or an inmate that was yelling. I just heard
402 screaming. So I ran into the dress-out room.

403

404 Q: Do you remember what was being screamed? Did you - do you remember?

405

406 A: No. I can't. I -- what was said, all I know is that when I came in there, what
407 the inmate was screaming.

408

409 Q: Okay. When -- so she said, "Why did you punch me?"

410

411 A: Yeah. "Why did you punch me? Why, you know, why I didn't do nothing?
412 Why? Well, you know, why you - why you treating me like this?" You know,
413 that's what she was.

414

415 Q: Uh, do you remember the deputies in there? Uh, were they giving any
416 commands?

417

418 A: Oh well (Persard) kept saying, um, she kept saying, "Well sweetie, if, uh, you
419 know, calm down, calm down." But all the while she's, you know...

420

421 Q1: Jacking?

422

423 A: So, you know, for me the perception when I'm in there - outside anybody
424 would think, oh, okay, well, she's just trying to calm her down. And maybe,
425 you know, because you're hearing the hey sweetie, you know, I mean, don't,
426 you know, calm down. Why are you doing this? She's making the, you know,
427 making those statements, but I'm in there, and I'm seeing her all the while
428 saying that coming out of her mouth. But she's got a boot to her damn chest,
429 and she's got her by the, you know, on her neck and then pulling her hair and
430 then adjusting her out and taking off her clothes.

431

432 Q: Um, I got that. So you said that, um, the inmate, uh, was, uh,
433 struggling.

434

435 A: Yes.

436

437 Q: Um, how was she struggling?

438

439 A: Well she was just trying to get out, you know, like anybody would that's
440 getting pinned down on the floor, you know, kind of, you know, moving
441 around and trying to, you know, push up and, you know, get off the floor.

442

443 Q: Would you say that she was being assaultive?

444

445 A: I don't. And she wasn't striking at anybody. I think more that she was just
446 trying to get away. More of, hey, let - let go of me, you know. It wasn't that
447 she was trying to hit somebody.

448

449 Q: If you were in (Persard's) situation, and it was reversed, and you were
450 (Persard) in that moment and you were getting that resistance from, uh,
451 what would your reaction be to that? I'm just trying to see what...

452

453 A: In regards to when I'm first dressing her out? If I see...

454

455 Q: No, no, no. So like someone's struggling like that - that you're trying to control
456 what would - how would you take control?

457

458 A: I would tell her to calm down and then let's put waist chains on her and then
459 let's take a seat. Let's, you know, let's, let's hold off on dressing out 'cause she
460 needs to calm down.

461

462 Q: Okay.
463
464 A: Yeah.
465
466 Q: Um, so you said that, uh, so she had an arm, uh, she had her foot on her
467 chest/stomach area.
468
469 A: Mm-hm.
470
471 Q: And then she put her hand around her throat.
472
473 A: Not both hands.
474
475 Q: Just one?
476
477 A: Just one hand. Right.
478
479 Q: Okay. And then I'm gonna just do it on the serg here. Uh, just basically, was it
480 like this?
481
482 A: It was her left hand.
483
484 Q: Okay. So left hand on the throat?
485
486 A: Yeah, she was on the -- okay. The inmate - the inmate was - I was on this side,
487 (Persard) was on this side. So when she was on this side, she was like this at
488 first on her - on her chest.
489
490 Q: Mm-hm.
491
492 A: The inmate was laying flat, and she's trying to control her arm here and then
493 trying to hold her down. And then at first - and then she, you know, I could
494 see her going like this, you know, around her neck. And, um, then eventually,
495 you know, I mean, you hear the inmate saying, "I can't breathe, I can't breathe.
496 I got asthma." And then - and then the thing was that when she finally let her
497 go, and we got her up, she was doing the, you know, the heavy breathing, you
498 know, like she's having an asthma attack.
499
500 Q: Sure.
501
502 A: Yeah.
503

504 Q: So did you see any squeezing to the neck or was it...
505
506 A: I, can I say how much pressure or what? No. I, you know, all I know was that
507 she was, you know, had a...
508
509 Q: Just your opinion. Do you think she was choking her or did her arm was just
510 down there to hold her down? What's your opinion on that?
511
512 A: I - I - I don't think it was a - a loose, you know, hold.
513
514 Q: Okay.
515
516 A: Yeah. I don't think that she was meaning to like, not, you know, knock her
517 unconscious from, you know, stopping her breathing, but it wasn't something
518 that was light.
519
520 Q: You said was, uh, when she got up, she started breathing heavily.
521
522 A: Yeah.
523
524 Q: Do you think she was faking that like exaggerating it or do you think she was
525 really having an asthma attack?
526
527 A: You know, she could be faking it, you know? I mean these inmates, you
528 know, and then I don't know if, you know, she was in on drugs. I really didn't
529 even look at her charges. I don't know if she was under the influence, you
530 know, 'cause is a repeat offender. I know who she is.
531
532 Q: Yeah.
533
534 A: You know? So, I mean...
535
536 Q: She's been...
537
538 A: ...they know how to play the game, too.
539
540 Q: ...in 4 - she's been in (unintelligible).
541
542 A: You know, don't get me wrong.
543
544 Q: But, um...
545

546 A: Yeah.
547
548 Q: What's your best guess Like, I know you've seen fakers. You've seen real
549 people...
550
551 A: Uh-huh.
552
553 Q: ...getting asthma attacks. Um, sometimes it's hard to tell.
554
555 A: Mm-hm.
556
557 Q: But what's...
558
559 A: She probably could have been exaggerating it - yeah.
560
561 Q: Okay.
562
563 A: I mean, I - I could say that she - she - more than (unintelligible).
564
565 Q1: She stated she was having an asthma attack? Or (unintelligible).
566
567 A: She was saying -- no. Well she was saying, "I got asthma." Before that. And
568 then as we picked her up she was, like, you know, breathing heavy, yeah.
569
570 Q1: But it wasn't like a mad (unintelligible).
571
572 A: Yeah. It was - it was just -- yeah.
573
574 Q1: Like (unintelligible).
575
576 A: Hm. Yeah.
577
578 Q1: Gasping for air type of thing.
579
580 A: Mm-hm. Yeah.
581
582 Q1: Okay.
583
584 A: A- and, you know, again, if she could be, you know...
585
586 Q1: Sure.
587

588 Q: Um, (unintelligible).
589
590 A: She knows how to play the game.
591
592 Q: You had mentioned that you told two people before you went to the sergeant.
593
594 A: Yes.
595
596 Q: What were their names?
597
598 A: Deputy (Gonzalez).
599
600 Q: Okay.
601
602 A: And, uh, (Jimenez). They were working CCW control at the time.
603
604 Q: And are they, uh, C team as well?
605
606 A: They are C team - yes.
607
608 Q: (Jimenez). Are they females?
609
610 A: Yes.
611
612 Q: Okay. Deputies, officers?
613
614 A: Both of them I believe are deputies.
615
616 Q: Okay.
617
618 A: Yeah.
619
620 Q: Um...
621
622 A: Yeah.
623
624 Q: I'm just now trying to make sure they're not, like, a civilian (unintelligible).
625
626 A: No, no, no. (Unintelligible).
627
628 Q: Okay.
629

630 Q1: (Gonzalez) with a Z or S?
631
632 A: Z.
633
634 Q: Do you know their first names?
635
636 A: Um...
637
638 Q: Okay.
639
640 A: Uh, we'd still be (unintelligible).
641
642 Q: (Unintelligible) last time business.
643
644 A: Yeah.
645
646 Q: Um...
647
648 Q1: (Unintelligible).
649
650 Q: Do you know their badge numbers by chance?
651
652 A: No.
653
654 Q: Okay.
655
656 A: (Unintelligible).
657
658 Q: Um...
659
660 A: But you could tell if you look on - it was August 9 that that incident happened.
661 They were both working CCW control.
662
663 Q: So how long have you been a deputy?
664
665 A: Fourteen years.
666
667 Q: Fourteen years?
668
669 A: Mm-hm.
670

671 Q: And how long have you worked at (Elmont)?
672
673 A: Uh, I got out of classification in 2011 - 2012. So from probably 2012 on.
674 Three years, maybe, close to.
675
676 Q: Okay. And how long have you been a JTO?
677
678
679 A: I've been a JTO for about seven or eight years.
680
681 Q: Seven or eight years?
682
683 Q1: Uh - uh, the 9th did you have training?
684
685 A: No. I was working overtime.
686
687 Q1: Oh.
688
689 A: Yeah. I was working overtime.
690
691 Q: Um, have you had in your 14 years of experience when you have to have
692 someone change out for whatever reason...
693
694 A: Okay.
695
696 Q: Um, have you had someone refuse?
697
698 A: Oh yeah.
699
700 Q: And have you ever drop - pulled them to the ground and stripped them naked
701 on the floor?
702
703 A: We have had - see, I've done most of my career at the main jail. So if we have
704 - I worked, like, booking area and female ID.
705
706 Q: Okay.
707
708 A: We strip searched the females. If we have a female that's goin' to 8A that we
709 have to - we escort her up and there's a camera, you know. So anytime that
710 somethin' like that h- happens we have to document that we're strip searchin'
711 that female.
712

713 Q: What you saw from Broussard, is that right?
714
715 A: Yeah, Broussard.
716
717 Q1: Broussard.
718
719 A: Mm-hm.
720
721 Q: Um, what's your explanation for why she did that? What she did.
722
723 A: Personal opinion?
724
725 Q: Mm-hm.
726
727 A: Broussard had some use -- you know. Uh - uh, she's had incidents where she's
728 had some use of force issues that a lot of people have complained about.
729
730 Q: Do you think she has, like, so she just gets angry easy?
731
732 A: I - you know, um, I had a situation with her a couple years back. And it wasn't
733 a use of force issue. It was more of a policy issue.
734
735 Q: Mm-hm.
736
737 A: I was working on side 2, and she had propped all the three doors open. And
738 they were all felons. And (unintelligible) in all units. And so I asked her, you
739 know, um, I hope that you're not one of these officers 'cause I know a couple
740 of them used to do that just to keep the inmates quiet after lockdown. And,
741 you know, it was a - a little situation. Well we didn't get into an argument or
742 anything. But she basically told me, "Well if you don't like it go ahead and
743 work somewhere else. I can stay here by myself." And I addressed her and I
744 told her, I said, "I can't - I can't leave my post. This is a two-man position.
745 You know, so you can't tell me to go ahead and leave. You're asking me to go
746 ahead and do something against policy. I'm not asking you to do something
747 against policy."
748
749 Q: Sure.
750
751 A: "So I would appreciate it if you do what you're supposed to be doing and not
752 put us at risk and close these damn doors."
753
754 Q: Okay. What's your, uh, relationship with - with her?

755
756 A: She's (unintelligible).
757
758 Q: Okay. Are you guys friends?
759
760 A: I - I - I would say that we're acquaintances. I don't - I don't hang out with her.
761 I don't, you know...
762
763 Q: You ever -- do you text at all?
764
765 A: No.
766
767 Q: Have you talked to her about this since?
768
769 A: Nope.
770
771 Q: Okay. Would you know, um, Simpson?
772
773 A: Simpson-Hogan?
774
775 Q: Yeah.
776 A: They both were on D team for sometime too.
777
778 Q: Do you know - are you friends with her?
779
780 A: No, I'm not.
781
782 Q: Do you know what their relationship is?
783
784 A: They're friends.
785
786 Q: Would you say, like, they were good friends?
787
788 A: Yes.
789
790 Q: Okay.
791
792 A: Well, and one of the things that (Gonzalez) and (Jimenez) has told me that,
793 um, whenever Broussard has a situation where she wants to do something...
794
795 Q: Mm-hm.
796

797 A: ...there's only two people that she's gonna call. And one of them is Simpson-
798 Hogan.
799
800 Q: Who is the other one?
801
802 A: Uh, (Papier).
803
804 Q: Uh, male?
805
806 A: Female.
807
808 Q: (Papier).
809
810 A: Mm-hm.
811
812 Q: Um...
813
814 A: She wasn't there that day and wasn't involved at all.
815
816 Q: Okay.
817
818 A: But there's only two - two officers that she would call to - to assist her in
819 things like this.
820
821 Q: So whenever she wants to get into use of force...
822
823 A: It's gonna be those...
824
825 Q: ...or throw down someone...
826
827 A: ...it's gonna be those two officers.
828
829 Q: Okay. Um, what do you know about Simpson and her, uh, (unintelligible).
830
831 A: She has - I don't like working with her. Um...
832
833 Q: Why not?
834
835 A: Her - her way of doing things is a little different than mine. I mean, I'm - one
836 of the things that you hear as far as I'm concerned with the inmates. You
837 interview an inmate they'll say, hey, Officer (Gonzalez) is cool as shit but

838 don't mess with her because she's gonna tear (unintelligible). When - when
839 we're wrong we're wrong, and they know it.
840
841 Q: When you say that do you mean...
842
843 A: Simpson-Hogan - she's - it's - the - the way she works is a little different than
844 me, you know. And so I don't like the way she speaks to inmates. I don't like
845 the way she addresses them. I'm just a little different.
846
847 Q: What - what don't you like about it? Is she aggressive? Is she...
848
849 A: Uh...
850
851 Q: ...does she jack people up? Or is she...
852
853 A: I - I've never really seen her do anything as far as physical inside the units or
854 anything like that. I mean, uh, it's just the way she works and talks to people...
855
856 Q: Okay.
857
858 A: ...that I don't...
859
860 Q: Um, how would you say it's different? I don't know how you work. You seem
861 very nice.
862
863 A: Yeah.
864
865 Q: Um, but (unintelligible).
866
867 A: But, yeah, I'm - I'm a very loud...
868
869 Q: I just...
870
871 A: ...person.
872
873 Q: Yeah.
874
875 A: I'm very, uh, I'm from New York, and I'm Puerto Rican. So I'm loud, you
876 know. And - and, you know, outspoken. Whereas but I would speak to you
877 tactfully. You know? Um, whereas Simpson-Hogan would be bitch this or ho
878 this. Or, you know, that kind of stuff.
879

880 Q: 'Cause she's derogatory?
881
882 A: Mm-hm.
883
884 Q: Okay. She's insulting...
885
886 A: Yeah.
887
888 Q: ...to the prisoners. Okay.
889
890 A: Mm-hm.
891
892 Q: Um, in terms of - so I'm just gonna get up here. So actually, I wanna go get
893 some pictures. I took some pictures of, um, this area. And I just...
894
895 A: Mm-hm.
896
897 Q: ...kind of wanna show you, so you can describe to me exactly what was...
898
899 A: Okay.
900
901 Q: ...goin' on. I'll be right back.
902
903 A: Yeah, no, no, no, they were on B team. Yeah, they were on B team.
904
905 Q: Oh you...
906
907 A: Yeah.
908
909 Q: (Unintelligible).
910
911 A: All of us have been on B team at the same time, yeah. They just recently
912 moved to C team this last bump.
913
914 Q: When was the bump?
915
916 A: Not - not this time - no. Maybe the one before that.
917
918 Q: (Unintelligible) these here.
919
920 A: Yeah. Maybe the one before that.
921

922 Q: So this is processing, right?
923
924 A: Mm-hm. That's the dress out one right there.
925
926 Q: So we're gonna - I'm just taking 360 degrees. Where, um, the two male
927 deputies (unintelligible).
928
929 A: They - they were around here. (Divine) was I believe here. And (Burton) was
930 somewhere around here.
931
932 Q: Okay. So that was all the deputies that were there?
933
934 A: You know, it happened...
935
936 Q: As far as you know.
937
938 A: ...so fast that I'm not - I know those specifically were there. And they could
939 have been CSAs 'cause there's CSAs in the back.
940
941 Q: Okay.
942
943 A: I come in.
944
945 Q: So that's - that's (unintelligible).
946
947 A: That's CCW, the gate. I'm walkin' this way. I come in through the door.
948
949 Q: Okay. Just go on (unintelligible). Um, so you come in to here, right?
950
951 A: No, I don't come in there. That's the dress out room.
952
953 Q: Okay. So where were they?
954
955 A: They were in the dress out room which is - yeah, this (unintelligible).
956
957 Q: So that's - this drop off comes in here, right?
958
959 A: Yeah, yeah, yeah.
960
961 Q: So this is - so where - which part of the dress out room were they in?
962

963 A: Right towards this way. There was a - a green bin that they put the clothes in,
964 inside there, yeah, like this. It was right on where that trash can was.

965

966 Q: So let's see here.

967

968 A: Oh excuse me.

969

970 Q: So kind of over here in the - in the - in the corner near this cleanup...

971

972 A: This bin was on this wall right here.

973

974 Q: (Unintelligible) better angle on it.

975

976 A: So, like, you see where this trash can is?

977

978 Q: Yeah.

979

980 A: That bin at that time was over where that trash can is on that wall.

981

982 Q: Okay. So where were they...

983

984 A: And they were on the floor this way first.

985

986 Q: So where's her head? Where's head?

987

988 A: head at first was this way towards that wall.

989

990 Q: Facing this wall.

991

992 A: Right.

993

994 Q: Okay.

995

996 A: And Broussard was on that side and Simpson-Hogan was over here.

997

998 Q: Okay.

999

1000 A: By the time when I went out, and I came back in their heads were over here
1001 closer to the door.

1002

1003 Q: So...

1004

1005 A: So...

1006

1007 Q: head had flipped this way?

1008

1009 A: Yeah, flipped this way.

1010

1011 Q: So she had flipped completely 180...

1012

1013 A: Yeah.

1014

1015 Q: ...degrees.

1016

1017 A: Over here.

1018

1019 Q: Okay.

1020

1021 A: And they were - she was, like, right at the entrance of the door.

1022

1023 Q: Mm-hm.

1024

1025 A: Sh- her head was that way. Broussard was, like, probably where the trash can

1026 is. And Simpson-Hogan was closer to the dress out, you know, the little cubby

1027 hole right there.

1028

1029 Q: Okay.

1030

1031 A: Closer to that end 'cause she was at her feet. I was on the right - I mean, on the

1032 left side.

1033

1034 Q: Okay. And then, um, so when she - head was kind of -- let's see --

1035 over here?

1036

1037 A: Yeah, over here.

1038

1039 Q: Okay.

1040

1041 A: So...

1042

1043 Q: And then, uh, Broussard was stepping on her chest?

1044

1045 A: Yes. head was this way, her legs were that way. Broussard was on

1046 this side, the right side of her. And so she stepped on her with her left foot.

1047

1048 Q: Okay.

1049

1050 A: Over here.

1051

1052 Q: And then what was, uh, Simpson-Hogan...

1053

1054 A: And...

1055

1056 ((Crosstalk))

1057

1058 A: ...was trying to pull off her pants on that end. She was probably close to this
1059 end. And her legs were over there, and she was - and is a tiny skinny
1060 little thing, you know. So she's not...

1061

1062 Q: Right. So was legs were facing this way?

1063

1064 A: Yeah, her legs were that way.

1065

1066 Q: Okay. And then Broussard was at...

1067

1068 A: head...

1069

1070 Q: ...(unintelligible) head?

1071

1072 A: ...was here, but she was - and her legs were goin'...

1073

1074 Q: Okay. And Broussard was closer to the bench with left foot on chest.

1075

1076 A: No, not close to the bench. Simpson-Hogan was close to the bench at her legs.
1077 Broussard was on her right side this way.

1078

1079 Q: So closer to the door.

1080

1081 A: Yeah.

1082

1083 Q: Okay. And then she was pulling the pants off. Do you remember exactly how
1084 she was doing that?

1085

1086 A: Oh, she was just trying to (unintelligible).

1087

1088 Q: Did she unbutton it, do you know? Or was it, like, was it tight? Did it just
1089 come right off?
1090
1091 A: Yeah. And she's...
1092
1093 ((Crosstalk))
1094
1095 A: She was nasty. I remember when she pulled it off dirty just, poof, everywhere.
1096 So I was, like, you know.
1097
1098 Q: (Unintelligible).
1099
1100 A: So she - she pulled the pants. And I think they were tight. But I, you know
1101 (unintelligible).
1102
1103 Q: Do you remember if they were jeans or sweatpants or shorts? Or...
1104
1105 A: No, they were long pants that I know. They weren't shorts.
1106
1107 Q: Okay.
1108
1109 A: Yeah.
1110
1111 Q: Do you remember what color they were by chance?
1112
1113 A: (Unintelligible).
1114
1115 Q: Okay.
1116
1117 A: Uh...
1118
1119 Q: Um...
1120
1121 Q1: I've got a - I got a question about the foot on the throat thing. I'm trying to
1122 figure out - I'm not very limber. But if she had her foot down on her chest, and
1123 you said she reached down?
1124
1125 A: No. No, no, no. She was - she was, like, this, right? She - at first was like this.
1126 And then she gets up slightly and was trying to hold - 'cause she was trying to
1127 struggle and go up while we were trying to, you know, do her shirt and all
1128 that?
1129

1130 Q1: Mm-hm.
1131
1132 A: And so she pulls - pushed her down and tried to push her down. And then she
1133 went back down like this but moved her leg and went like this.
1134
1135 Q1: So her - she took her foot off of her chest basically.
1136
1137 A: Yeah. Then she took it off.
1138
1139 Q1: To get back down.
1140
1141 A: Yeah. She didn't - right. To get back down to...
1142
1143 Q1: Arm.
1144
1145 A: Yeah.
1146
1147 Q1: Okay.
1148
1149 A: Mm-hm.
1150
1151 Q1: All right. That makes more sense.
1152
1153 Q: So - so when she - how long do you think the - the foot was on the chest?
1154
1155 A: I'm not (unintelligible) seconds. Not - not minutes, you know what I mean? It
1156 was - 'cause we weren't in there.
1157
1158 Q1: Forty seconds, 45 seconds, 15 seconds?
1159
1160 A: Ten to 15 seconds.
1161
1162 Q1: Okay.
1163
1164 A: Yeah, I would say. It - it wasn't long.
1165
1166 Q: And how long do you think the - kind of...
1167
1168 A: Again...
1169
1170 Q: ...a neck hold or...
1171

1172 A: Not very long, you know? Um, it was just, you know, she -- yeah. I mean,
1173 seconds as well I would say.
1174

1175 Q: Okay. And then while the foot was on, and she transitioned into more of a
1176 choking hold...
1177

1178 A: Mm-hm.
1179

1180 Q: She's still trying to take off the pants, Simpson-Hogan?
1181

1182 A: Simpson-Hogan's still trying to take off her clothes.
1183

1184 Q: Okay.
1185

1186 A: And I was (unintelligible) too because at this point where, like I said, I was
1187 committed. So I'm over here holding her hand. And at the same time Simpson-
1188 Hogan is trying to pull her legs I'm trying to take off her - her pants. You
1189 know, the top part and try to pull them down. But when I got - came in the
1190 second time they were already, like, halfway down like this, you know.
1191

1192 Q: Okay.
1193

1194 A: They were already off.
1195

1196 Q: How did the shirt end up getting - the blouse, whatever she was wearing off
1197 her?
1198

1199 A: Oh, we ended up - but that's - what happened we ended up pulling her up to
1200 take her arms out of the sleeves.
1201

1202 Q: Okay.
1203

1204 A: And then once we got her shirt off, and we started pulling - putting the other
1205 shirt on while she's still struggling, once we got it on she - she pulled her
1206 down by her hair.
1207

1208 Q: Got it. So she's...
1209

1210 A: Yeah.
1211

1212 Q: ...sitting - she's sitting on her butt...
1213

1214 A: Right.
1215
1216 Q: ...toward - towards...
1217
1218 A: She's always...
1219
1220 Q: ...the fence.
1221
1222 A: ...like on her back somehow. W- what, you know, uh, either up or down she's
1223 on her back. She never twisted around or nothin'.
1224
1225 Q: So is she - she gets up. So she's sitting like this on the floor? And then grabs
1226 the hair...
1227
1228 A: Yeah.
1229
1230 Q: ...and pulls back?
1231
1232 A: Just - just pulls (unintelligible).
1233
1234 Q: Okay. And then she's...
1235
1236 A: Pretty much...
1237
1238 Q: ...does she slam into the ground?
1239
1240 A: No. Uh, no, no, no, no, no. She didn't - I mean, I - I just thought - 'cause if you
1241 remember when she's got her hand behind us, so she didn't hit her head or
1242 anything 'cause she's got her hand behind her head.
1243
1244 Q: Okay.
1245
1246
1247 A: Yeah.
1248
1249 Q: Um, never get on the floor (unintelligible). Um...
1250
1251 Q1: Playing Twister.
1252
1253 Q: So after you got the shirt on did the pants come back on first? Or did you put
1254 the shirt on?
1255

1256 A: The shirt was last. The pants were already on.
1257
1258 Q: So you got them off. When did you...
1259
1260 A: Yeah.
1261
1262 Q: ...get pants back on her?
1263
1264 Q1: You put jail clothes back on her, right?
1265
1266 A: Yeah. We put jail clothes on her.
1267
1268 Q: How'd that - how'd that transition go?
1269
1270 A: I don't know. Just a struggle. I mean, you know, she was wiry. So we just
1271 ended up pulling -- well we got her on her feet. We got everything on her.
1272 And the pants were still not completely up. So when - when we got her up
1273 Broussard comes behind her and pulls her pants up.
1274
1275 Q: Okay.
1276
1277 A: You know, and at the time she didn't have no gloves on. She goes, "Oh how
1278 nasty." You know. And (unintelligible), "Well, you probably should have put
1279 gloves on," you know, jokingly.
1280
1281 Q: Um, what - so after you got the clothes on what happened after that?
1282
1283 A: Well then we walked her out.
1284
1285 Q: How'd you walk her out?
1286
1287 A: Well we - we just escorted her out 'cause she was coming in backwards at the
1288 time.
1289
1290 Q: Did you have, like, pain compliance holds on her?
1291
1292 A: Yeah. I mean, I had her on, you know, uh, twist lock and wrist lock.
1293
1294 Q: Okay.
1295
1296 Q1: (Unintelligible).
1297

1298 A: Yes. But when we got her out.
1299
1300 Q1: Okay.
1301
1302 A: But that's when Deputy...
1303
1304 Q1: (Unintelligible).
1305
1306 A: ...(Burton) and the officer actually finally helped, you know? And put the
1307 weight chains on her.
1308
1309 Q: So you...
1310
1311 A: But then we escorted her to the chair, the locking chair.
1312
1313 Q: So let me - I'm just sorry (unintelligible) to get real specific. So when you
1314 said, uh, we escorted her you were one arm?
1315
1316 A: I was here.
1317
1318 Q: Do you remember which arm you had?
1319
1320 A: I still was on her right arm.
1321
1322 Q: Okay.
1323
1324 A: Yeah.
1325
1326 Q: And who had the left arm?
1327
1328 A: Broussard had her left arm.
1329
1330 Q: And what...
1331
1332 A: Simpson-Hogan was towards the front. (Roberting) came around, um, the
1333 back.
1334
1335 Q: Okay.
1336
1337 A: So we put her, you know, from the door we put her against the wall.
1338
1339 Q: Okay.

1340

1341 A: Right there. And so when we put her against the wall he put her waist chains
1342 on.

1343

1344 Q: And this is inside the changing area? Or...

1345

1346 A: No, no. This was - we pulled her out of the changing area and put her against
1347 the wall right on the - where you could see it on...

1348

1349 Q1: (Unintelligible), right?

1350

1351 Q: Yeah.

1352

1353 A: Yeah, you could see yeah, she's on the wall. And then that's when (Burton) put
1354 her - the waist chains on. (Unintelligible).

1355

1356 Q: So you step out...

1357

1358 A: So when we stepped out we put her right here on this wall.

1359

1360 Q: On the inside (unintelligible).

1361

1362 A: No, no, that - this one. 'Cause this is the bathroom. So of the - yeah. Um, no.
1363 This wall right here.

1364

1365 Q: Got it. So right out that door.

1366

1367 A: 'Cause that's the bathroom. This is the dress house.

1368

1369 Q: So she's facing the wall?

1370

1371 A: So she's facing the wall.

1372

1373 Q: Okay. And then your waist chain and shackle are here?

1374

1375 A: Waist chain and shackles are there. And then we walk her this way where all
1376 the lobby chairs are at. And we put her in that chair.

1377

1378 Q: This chair.

1379

1380 A: Yeah.

1381

1382 Q: Okay. And then, um, is she struggling still here?
1383
1384 A: At that point, we just attached her and I left. I was...
1385
1386 Q: Did you hear anything that she said?
1387
1388 A: I left.
1389
1390 Q: Okay.
1391
1392 A: At that point, I left.
1393
1394 Q: And you haven't had a conversation with (Bernardo) or, uh, Simpson...
1395
1396 A: Broussard.
1397
1398 Q: Broussard and...
1399
1400 A: No.
1401
1402 Q: ...Simpson...
1403
1404 A: Nope.
1405
1406 Q: ...at all. Um, or (unintelligible).
1407
1408 A: Only - only afterwards when I had to call her on - on the (IR) number, I
1409 believe. Or the report number that...
1410
1411 Q: This right here, (IR)?
1412
1413 A: Yeah. Just for - yeah.
1414
1415 Q: Okay. Um, and then what'd she say?
1416
1417 A: Nothing. I mean, on the way ut she said, "Oh thanks for helping me, Rivera."
1418 And that was it. And then I left.
1419
1420 Q: So, in your professional opinion, what - what's her take on this?
1421
1422 A: I just think it could have been handled better.
1423

1424 Q: Okay. Do you think that, um, the for- the force used was excessive?
1425

1426 A: It was unnecessary. But we shouldn't have even been put in that position to
1427 begin with.
1428

1429 Q: Got it. But, uh, once in the position it's, like you said, it's, like, you're kind
1430 of...
1431

1432 A: Yeah.
1433

1434 Q: ...already committed to...
1435

1436 A: We're already committed to it.
1437

1438 Q: ...it, right? Um, do you think the foot on the chest...
1439

1440 A: Mm-hm.
1441

1442 Q: ...and the arm choke thing...
1443

1444 A: Yes.
1445

1446 Q: ...uh, do you think that was excessive force?
1447

1448 A: Yes.
1449

1450 Q: Okay. Um, (unintelligible) you're not a lawyer. I don't wanna make you - you
1451 know...
1452

1453 A: No.
1454

1455 Q: ...you're not on the enforcement side so it's, like, the penal code stuff is...
1456

1457 A: Right - no.
1458

1459 Q: It's not your - it's not your forte. Um, however, do you think that this is
1460 something that's criminal based - just your opinion. Like, do you think it's a
1461 criminal...
1462

1463 A: You know, um, I - you know, didn't come out of there bleeding or,
1464 you know, anything like that. And, yes, she was struggling. You know, I just
1465 think that for me, um, Broussard is, uh - I wouldn't say, like, untrustful I just

1466 don't wanna work with her. But I - I can't - I - I don't wanna be put in a
1467 position where I can't count on her to not take it to a level that is unnecessary.
1468 'Cause to me this was unnecessary. So now as far as you know, I
1469 mean, I'm sure she came out of it okay. But could have b- h- been handled
1470 differently, yes. Um, you know, she didn't come out of there with scratches.
1471 They didn't find anything on her. But, yet, again, she had her clothes, or else
1472 they would have probably seen a big boot - boot mark on her chest, you
1473 know? But, you know...

1474
1475 Q1: You think what happened to her, though, is criminal?

1476
1477 A: No. I mean, i- it...

1478
1479 Q1: Explain what happened.

1480
1481 Q: That's - so this is what we're trying to figure out. Obviously, we don't have a
1482 video of what happened, right?

1483
1484 A: Yeah.

1485
1486 Q: And - and when people are in a struggle memory's not 100%. It - it can - who
1487 was where.

1488
1489 A: Mm-hm.

1490
1491 Q: The specifics, how many seconds, stuff, like...

1492
1493 A: Right?

1494
1495 Q: Right? All that stuff...

1496
1497 A: Yeah.

1498
1499 Q: ...matters. In - in court.

1500
1501 A: Mm-hm.

1502
1503 Q: Right? All that stuff matters. My memory's fuzzy. It's not...

1504
1505 A: Yeah.

1506

1507 Q: ...the greatest - it's not the greatest thing.
1508
1509 A: Right.
1510
1511 Q: Um, but just opinion-wise it's - I - I value it. I don't know if other people will,
1512 but I value it. Because you do your job and that's a job I - I - I don't think I
1513 could do. Um, I wouldn't have - I wouldn't have the skills for it. But, um, what
1514 do you think? Is your opinion - it doesn't mean anything other than your
1515 opinion.
1516
1517 A: Just my opinion.
1518
1519 Q: Yeah.
1520
1521 A: I - I think that - uh. It was insult, you know?
1522
1523 Q1: And if you wanna take the totality of everything you know about her, what's
1524 happened?
1525
1526 A: That's why I'm taking it...
1527
1528 Q1: And brush...
1529
1530 A: as a total...
1531
1532 Q1: ...you know...
1533
1534 A: You know...
1535
1536 Q1: ...sweepin' all into this one big pile.
1537
1538 A: And put it -- right. And that's why because I think she's dangerous to be
1539 around.
1540
1541 Q: Okay. Um, and I'm guessing you're saying that she's dangerous to be around
1542 because you've seen her do similar things in the past?
1543
1544 A: Just -- yeah. Just her - the way she handles things. The way she does things.
1545 Um, officers have addressed her use of force issues. Nothing has been done
1546 about it. Um, I - in been speaking with, you know, I haven't talked - I haven't
1547 worked with her in a long time, you know, but I just know how she can be,
1548 you know? And I - in a way, I hate giving my opinion, 'cause it's been a long

1549 time, you know? But I just know, for me, she's dangerous. I don't wanna be
1550 around her, I don't wanna work with her, you know? I can't trust her to be my
1551 partner.

1552
1553 Q: Okay. What do you think about Simpson-Hogan's actions?

1554
1555 A: I think Simpson-Hogan is, uh, kinda dragged into it at times, you know? I
1556 mean, I think that she has the same mentality, but I think a lotta the times it's,
1557 "Hey, we're girls, and we got each other's back, and we're gonna do it," you
1558 know? That kind of stuff.

1559
1560 Q1: Is it a - is it a girl thing or is it somethin' else?

1561
1562 A: I don't know - I don't know what it is, uh, with them. You know, I mean, y- I
1563 d- you know, in - in like, any department, um, y- you have little cliques that
1564 hang out together.

1565
1566 Q: Uh-huh, of course.

1567
1568 A: You know - you know, and so, they have their little clique and they kind of
1569 protect each other, and know what they wanna do, you know, "Hey, I - I got
1570 your back." You know, "This is the kinda report we're gonna write together."

1571
1572 Q1: Uh-huh, (unintelligible)...

1573
1574 A: "We're gonna talk." You know.

1575
1576 Q1: ...code of conduct.

1577
1578 A: Right. So that is their code of conduct.

1579
1580 Q1: (Unintelligible) you know, you've entrusted to...

1581
1582 A: Not...

1583
1584 Q1: ...to make the...

1585
1586 A: Right.

1587
1588 Q1: ...ER sound the way it should sound.

1589
1590 A: That's th- that's them.

1591
1592 Q: Uh, let me ask you this, um, Simpson-Hogan, I'll be - I'm gonna have to
1593 interview everyone...
1594
1595 A: Uh-huh.
1596
1597 Q: ...right, um, just to do a thorough investigation.
1598
1599 A: Right.
1600
1601 Q: And where this ends up, I don't know. Um, but we just ne- want the facts of it
1602 all. Uh, do you think...
1603
1604 Q1: We thank you for your honesty...
1605
1606 A: Uh-huh.
1607
1608 Q1: ...or for your opinions, at this...
1609
1610 Q: I think the - I've talked to a lot of, uh, custody deputies and officers over the -
1611 over the years...
1612
1613 A: Uh-huh.
1614
1615 Q: ...and it's rare, and - to get this kind of honesty from someone, so I really...
1616
1617 A: Uh-huh.
1618
1619 Q: ...commend you.
1620
1621 A: Thank you.
1622
1623 Q: Do you think Simpson-Hogan is going to be honest?
1624
1625 A: I think she might sugarcoat it.
1626
1627 Q: Okay.
1628
1629 A: 'Cause it's her friend.
1630
1631 Q: Do you think, um...
1632

1633 A: Broussard?
1634
1635 Q: ...Broussard is going to be honest?
1636
1637 A: She's gonna definitely sugar-coat it.
1638
1639 Q: Okay. Do you think that...
1640
1641 Q1: She'll be standoffish with us, you think?
1642
1643 A: She might be?
1644
1645 Q1: We confront her with...
1646
1647 A: You know...
1648
1649 Q1: ...the issues?
1650
1651 A: ...I mean, Broussard has had some time off because of her, you know...
1652
1653 Q: Days on the beach for her issues?
1654
1655 A: Right, for her problems.
1656
1657 Q: Okay. Uh...
1658
1659 A: Threatening the...
1660
1661 Q: Do you think she would just li- straight up lie to us?
1662
1663 A: I think she's gonna tell you what she did, but she's gonna...
1664
1665 Q1: Let me ask you something...
1666
1667 A: ...leave out some stuff.
1668
1669 Q1: ...did you see, or -- and - and this is, uh, playing that whole thing, right there,
1670 did you see the ER she wrote regarding this event?
1671
1672 A: Uh-uh.
1673

1674 Q1: Okay, no?
1675
1676 A: Uh-uh.
1677
1678 Q1: All right. (Unintelligible).
1679
1680 Q: Um, do...
1681
1682 A: I was told once I talked to the Sergeants, right, exactly how I felt and what I -
1683 I mean, what I did, what I saw, and then, the conversation that I had with him
1684 afterwards. And so, that's exactly what I wrote on my ER.
1685
1686 Q: Okay.
1687
1688 A: And it's exactly what I'm tellin' you right now.
1689
1690 Q: Okay.
1691
1692 Q1: Have you been party to a, uh, an incident where Broussard maybe hi- or
1693 Simpson has been a part of as well, and I kno- I - I'm sure you guys are like
1694 we are, we - we have some sort of a - a big event, and we all have to write
1695 paper on it, we all get together, (unintelligible), and we put our - our - we get
1696 everybody in line...
1697
1698 A: Yeah, yo-...
1699
1700 Q1: ...you know, this is our suspects, this is our victims...
1701
1702 A: Yeah.
1703
1704 Q1: ...this is...
1705
1706 A: Uh-huh.
1707
1708 Q1: ...you know, our witnesses, and we get everybody all lined up, and everybody
1709 goes off and writes their own part of paper.
1710
1711 A: Right.
1712
1713 Q1: But -- and - and just as an example, a use of force situation, in enforcement,
1714 everybody that is there, whether they saw it or not, per policy is to write paper

1715 on what they saw.

1716

1717 A: Uh-huh.

1718

1719 Q1: Have you seen them, o- write an ER that may have not been exactly what
1720 happened?

1721

1722 A: No, I - uh-uh, I d- I have never dealt with - like I said, um, Broussard usually
1723 is a loner, they usually put her in spots where she works a- by herself. And
1724 this is actually the first time that I've seen her actually, I think it's gotten to the
1725 point where they don't know where to put her anymore, 'cause nobody wants
1726 to work with her, you know? And this is what I hear from the girls on C
1727 Team, and they're like (Jimenez) and (Gonzalez) and (Glacier), you know, I
1728 mean, I've talked to as well, you know? And they addressed me 'cause I
1729 worked the following Monday as well, and then I was put on the men's side
1730 this time. And so Officer (Glacier) came over to me the following day and
1731 told me, "You know, I commend you because we've all been trying to address
1732 this with the Sergeant, and her behavior, and issues that we've had with her,
1733 and you're the first one that's actually gonna go ahead and - we - we feel bad
1734 that it was on overtime, and you got - you got put in the position of, you
1735 know, uh, of doing tha- you know, I mean, responding and doin' what you're
1736 supposed to do, but then you're - you're put in this position to see what I didn't
1737 wanna see."

1738

1739 Q1: Uh-huh.

1740

1741 Q: Let me ask...

1742

1743 A: You know?

1744

1745 Q: ...um, I have a question about processing the building itself.

1746

1747 A: Uh-huh.

1748

1749 Q: Do people go there to kinda - as a break room, like, for snacks or anything?

1750

1751 A: No, I don't.

1752

1753 Q: Do you remember there being snacks in there that evening, like a cheesecake
1754 or?

1755

1756 A: Oh no, I...

1757

1758 Q: No?

1759

1760 A: ...I didn't even - oh yeah, well the officers will bring food, we have a
1761 refrigerator - I mean a lotta locations have refrigerators, and officers - I know
1762 on D Team, like Hogan and a lotta people that actually work there regularly,
1763 will bring a little spread for them to eat duri- 'cause nobody likes ODR food,
1764 you know? So, we bring our - our stuff, yeah.

1765

1766 Q: Um, would you say processing is common though, to hang out, like, deputies
1767 just hang...

1768

1769 A: Some people will pass by, yeah. And then you've got the R ro- Rovers that
1770 come from the main jail, and...

1771

1772 Q: Okay.

1773

1774 A: ...will talk, and...

1775

1776 Q: So, I wanna talk about Simpson-Hogan's assignment. She was in...

1777

1778 A: C Unit.

1779

1780 Q: ...and M3?

1781

1782 A: No W4C, sh-...

1783

1784 Q: That is the...

1785

1786 A: ...that was the women's facility.

1787

1788 Q: W4? So that's the maximum security...

1789

1790 A: Right, that's usually...

1791

1792 Q: ...wing of...

1793

1794 A: ...my unit, right.

1795

1796 Q: Okay.

1797

1798 A: Uh, my team.

1799

1800 Q: So you usually work there?

1801

1802 A: Uh-huh.

1803

1804 Q: And then, what is it a two-man assignment? Or two...

1805

1806 A: That's a two-man position, she had a trainee that night.

1807

1808 Q: And is the trainee a position, or is that - does that...

1809

1810 A: No, that's the position...

1811

1812 Q: A- and...

1813

1814 A: ...it's not like an extra body.

1815

1816 Q: Okay.

1817

1818 A: Yeah. It's not sh- her and an officer that's workin' in the unit, and then she's got a trainee...

1819

1820

1821 Q: Okay.

1822

1823 A: ...just assisting.

1824

1825 Q: So the trainee's just a regular person?

1826

1827 A: He's - yeah.

1828

1829 Q: And they count?

1830

1831 A: Uh-huh.

1832

1833 Q: On FTO?

1834

1835 Q1: (unintelligible) sta-...

1836

1837 Q: On e-...

1838

1839 Q1: ...minimum staff?

1840

1841 A: Right. Uh-huh, it's a...
1842
1843 Q: On our end, it's a trainee is no one, they don't count for the staffing, so...
1844
1845 A: Right, no, this -- yeah, no, we...
1846
1847 Q: Um...
1848
1849 A: ...count it.
1850
1851 Q: ...so it sounds like Simpson-Hogan left trainee.
1852
1853 A: Uh-huh.
1854
1855 Q: Do you remember who the trainee was?
1856
1857 A: Kitong.
1858
1859 Q: So left Kitong...
1860
1861 A: Uh-huh.
1862
1863 Q: I like that name.
1864
1865 A: Uh-huh.
1866
1867 Q: Um, alone?
1868
1869 A: Uh-huh.
1870
1871 Q: What's your thought on that?
1872
1873 A: Well that's what they were saying, ca- I mean, 'cause (Jimenez) is saying
1874 (Gonzalez), when I went to talk to them, they were saying, "Yeah, she's got a
1875 trainee in there, and she took off, and we saw her walking towards
1876 processing." So when, you know, I went and addressed my frustration, they
1877 go, "No wonder she took off, 'cause she's got a trainee in there." So...
1878
1879 Q1: Ho- how - how long had the trainee been working for us?
1880
1881 A: Uh, it's this last Academy, so they - they probably - well, they were probably
1882 in their 15th week, you know, of training.

1883

1884 Q1: So you're a GTO?

1885

1886 A: Yeah, but I wasn't training.

1887

1888 Q1: W- oh no, no...

1889

1890 A: ...that one, I don't know...

1891

1892 Q1: I - I'm gonna ask you a question.

1893

1894 A: Uh-huh.

1895

1896 Q1: What - what does - what is your guys' policy as far as trainees? If the 15
1897 week...

1898

1899 A: We don't leave our trainees alone.

1900

1901 Q1: Okay, so it's no different than ours?

1902

1903 A: Uh-uh.

1904

1905 Q: Not even in an emergency?

1906

1907 A: Um, i- you know, in - in a case where, like in C Unit, we have to go to lunch.
1908 And so if we do- I mean, when - at their 15th week, they don't have to shadow
1909 us everywhere.

1910

1911 Q: Got it.

1912

1913 A: So, um, they can stay there, but of course, they can't go into the unit by
1914 themselves, they have to get an officer to come in and - and say, "Okay, we're
1915 doin' a welfare check, standby." And he has, you know, he or she has to do
1916 their check, and then come back out to the officer station. C Unit is the
1917 maximum security unit, so, you know, the officer station is outside of the
1918 units. So, if he's left there for 30 minutes, an hour, or whatever, as long as he's
1919 getting somebody to do the welfare checks, to standby, then he's fine alone.

1920

1921 Q: Then he's fine in the pod alone?

1922

1923 A: Yes. Right.

1924

1925 Q: Would you just - would you leave someone alone in - a trainee in their pod o-
1926 ...
1927
1928 A: On their 15th week? Yes.
1929
1930 Q: Okay, so it's just not that...
1931
1932 A: I ge- I feel that...
1933
1934 Q: ...big of a deal?
1935
1936 A: Yeah, it's not - it's not that big of a deal, right.
1937
1938 Q: Okay.
1939
1940 Q1: Okay, that's - that's what I...
1941
1942 A: Uh-huh, yeah.
1943
1944 Q1: ...(unintelligible) all right.
1945
1946 Q: Um...
1947
1948 A: N- not on their 15th week, right.
1949
1950 Q1: Okay. How many weeks were they in the - in the GTO (unintelligible)?
1951
1952 A: It's 24 weeks, and I know that this academy 'cause the trainees that I have,
1953 which was outta that academy, they were on their 23rd week, so we're talking
1954 -- well not even, then it has to be probably around the 20th week. So even
1955 later, you know, he's probably had...
1956
1957 Q: That was the 15th week.
1958
1959 A: ...maybe, yeah. Oh it was?
1960
1961 Q: Uh, yeah.
1962
1963 A: Oh okay.
1964
1965 Q: Um...
1966

1967 A: (Unintelligible)
1968
1969 Q1: Just never second-guess yourself.
1970
1971 A: Oh, uh-huh.
1972
1973 Q: I was actually impressed you said the same number I got...
1974
1975 A: Oh okay.
1976
1977 Q: ...from the records. Um, were there closer women to help...
1978
1979 Q1: Officers you mean?
1980
1981 Q: Yeah, just women officers, deputies, to come help her, rather than calling
1982 Simpson-Hogan?
1983
1984 A: Um, well she's always gonna have to get somebody from - from CCW, 'cause
1985 it's very rare you have a woman working the men's side. You have to have one
1986 in processing, but the m- th- who she was working with were all men. So m-
1987 no matter what, she would have to call somebody.
1988
1989 Q: And if you - if you wanted assistance with, uh, th-...
1990
1991 A: I wouldn't call a JTO that has a trainee.
1992
1993 Q: Um, I mean w- if you...
1994
1995 Q1: But would you call...
1996
1997
1998 A: Uh-huh.
1999
2000 Q1: ...W4C?
2001
2002 A: No, I would call a Sergeant, especially in that s- in a situation, I wouldn't have
2003 to go ahead and dress her out.
2004
2005 Q: Would you call someone via phone if you needed, uh, assistance, or would
2006 you just call someone on the radio?
2007

2008 A: Depending on the situation, you know what I mean, if - if she was, uh, givin'
2009 me a hard time, I've got three other officers in that processing area that should
2010 be able to help me to go ahead and waist chain her, and shackle her, and put
2011 her on a chair.
2012
2013 Q: So as far as you're...
2014
2015 A: And so we call a Sergeant.
2016
2017 Q: As far as you're concerned, there's no real legitimate reason for her to have
2018 called Simpson-Hogan.
2019
2020 A: No.
2021
2022 Q: Okay.
2023
2024 A: No- none whatsoever.
2025
2026 Q: Okay. Um, you got anything?
2027
2028 Q1: Mm, Burden and (Divine), what - is that - was that their regular...
2029
2030 A: Burden was in there...
2031
2032 Q1: ...position?
2033
2034 A: ...training. He's a - it's secondary chairing, it's - you know, it's not - he's not a
2035 new officer. So, that's a position that is, you know, like, for us wanting to
2036 learn a control position, or you know, a specialized position. So he was in
2037 their training, that was my understanding. (Divine) was his training officer.
2038 Now (Divine) was the regular officer in there.
2039
2040 Q1: Now, is it normal that - that the officers behind the desk there would go assist
2041 somebody having an issue in...
2042
2043 A: Uh-huh...
2044
2045 Q1: ...(unintelligible)?
2046
2047 A: I know on our team they would. I don't know i- w- I - it was a surprise to me
2048 that nobody even - you hear your partner's yelling in there, or somebo-
2049 something's going on, why would you guys not go?

2050
2051 Q: What do you think, are they just lazy? They just don't wanna get involved?
2052
2053 A: No, I think - I think it's that...
2054
2055 Q1: (Unintelligible) work with (unintelligible)...
2056
2057 A: ...their ti- (Divine) has made an i- a point to say, "This woman is dangerous."
2058
2059 Q: So she - he just does that (unintelligible)?
2060
2061 A: And so you're - you're - and, "Please get her the hell outta here." You know?
2062 And...
2063
2064 Q1: Well I think it's more of a I'm not helpin' her because I'm not gonna get sucked
2065 into her shit...
2066
2067 A: Right.
2068
2069 Q1: ...and I'm not gonna...
2070
2071
2072 A: Uh-huh.
2073
2074 Q1: ...get in trouble.
2075
2076 A: Right.
2077
2078 Q1: Versus you know what, um, you know, it's all good in here, you know? Did
2079 they - did they do anything to try and, uh, dissuade you from going in there?
2080
2081 A: No, I ran in...
2082
2083 Q1: Like, maybe they were covering up for the...
2084
2085 A: ...anyway, they didn't eve- they didn't have to stop, (unintelligible) sayin'
2086 (unintelligible) even if they did...
2087
2088 Q: So, you sa- you originally said that...
2089
2090 A: ...I was already running in.
2091

2092 Q: You said originally they said, "Rivera, we got this."
2093
2094 A: Yes.
2095
2096 Q: And who said that to you?
2097
2098 A: Broussard.
2099
2100 Q: And was she, like, going, like, putting the incarcerated offense...
2101
2102 A: No, she just - she was pinning her down, she goes, "R- Rivera, we got this."\
2103
2104 Q: Why do you think she said that?
2105
2106 A: Because she doesn't want me watching what she's doing.
2107
2108 Q: Got it. Um, is that common? Have you experienced other deputies...
2109
2110 A: She has done that with other ones.
2111
2112 Q: That you've heard of?
2113
2114 A: Uh-huh.
2115
2116 Q: Do you have firsthand knowledge, or just, you heard it through the grapevine?
2117
2118 A: Through the grapevine.
2119
2120 Q: Okay.
2121
2122 A: Yeah.
2123
2124 Q: Um, is it common when someone's struggling to refuse help?
2125
2126 A: No.
2127
2128 Q: Have you ever had that happen to you before?
2129
2130 A: Uh...
2131
2132 Q: Where they say...
2133

2134 A: For me?
2135
2136 Q: "Yeah, Rivera get..."
2137
2138 A: No, no, that's the first time I've ever had t- you know, I mean, and even if she
2139 di- and when she did, I came back up with my gloves on, and Burden was
2140 saying, "You need (unintelligible) come out." You know, whatever. And then
2141 he asked me if she was naked, "I don't know." And then I ran back in. I don't
2142 care if she told me not to be there. I - I - I responded.
2143
2144 Q: Okay. Um, do you think there's anything else important to add to this that we
2145 haven't talked about?
2146
2147 A: I- you know, I mean, for me, it's gonna be y- for me, I just tell you what I
2148 experienced with her.
2149
2150 Q: Uh-huh.
2151
2152 A: You know, I just know that other officers that have dealt with her have had the
2153 same issues.
2154
2155 Q: Okay.
2156
2157 Q1: Oh and that (unintelligible) with him and a (unintelligible) on the wall, right?
2158 About an alarm?
2159
2160 A: Yes.
2161
2162 Q1: Was that par- do you know if that was ever pushed?
2163
2164 A: Uh-huh.
2165
2166 Q: Yeah, there was a (unintelligible)..
2167
2168 Q1: Did she ever announce on the radio that she needed a..
2169
2170 A: She didn't a-..
2171
2172 Q1: ...415 or anything like that?
2173
2174 A: Nope.
2175

2176 Q1: Or...
2177
2178 A: Uh-uh.
2179
2180 Q1: ...al- or type of assistance?
2181
2182 A: Well that's why Sergeant Sevillano had said - had - well, you know what, I
2183 don't even know if that y- I thought there was a b- a - an alarm, I'm not sure.
2184
2185 Q: Okay.
2186
2187 A: Yeah.
2188
2189 Q: I'll look into it.
2190
2191 A: So...
2192
2193 Q1: And most of those rooms have a...
2194
2195 A: Yeah...
2196
2197 Q1: ...have (unintelligible)...
2198
2199 A: ...most of them have a scam alarm, a little button.
2200
2201 Q1: Yeah.
2202
2203 Q: Let's look at the pictures...
2204
2205 A: You know...
2206
2207 Q: ...see if we see it.
2208
2209 A: ...now whether or not they work, that...
2210
2211 Q1: That's a whole other story...
2212
2213 A: That's a whole 'nother story.
2214
2215 Q1: ...that's beyond us. Yes.
2216

2217 A: Yeah, because I've done it, you know, inspections, you know, and check 'em
2218 and sometimes...
2219
2220 Q: Okay.
2221
2222 A: ...they don't work, so.
2223
2224 Q: It's a County Jail.
2225
2226 A: Yeah. Right.
2227
2228 Q1: I know, (unintelligible)...
2229
2230 Q: It's just county equipment.
2231
2232
2233 Q1: ...W2 or W1 where - in the interview - even in the interview rooms you have...
2234
2235 A: Yeah.
2236
2237 Q1: ...the alarm...
2238
2239
2240 A: The scam alarms, right.
2241
2242 Q1: Yeah.
2243
2244
2245 A: And - and as long as (unintelligible)...
2246
2247 Q: Is this an alarm here?
2248
2249
2250 A: No. That's like a door-stopper?
2251
2252 Q: No? Okay.
2253
2254 Q1: Yeah.
2255
2256
2257 A: And I don't even know, 'cause there's no door there.
2258

2259 Q: Let's see if I have a picture. What would the o- is...
2260
2261
2262 A: It would - it would be like a little...
2263
2264 Q1: It - it would be by the door.
2265
2266
2267 A: ...back button, you know, it would be. No, that's the light e- m-...
2268
2269 Q1: 'Cause they're usually by the - the door.
2270
2271
2272 A: There's usually like, th- I know in the back wall, there's a - a panel, but...
2273
2274 Q: I don't think that show...
2275
2276
2277 A: ...you know.
2278
2279 Q: And its...
2280
2281
2282 A: I - I don't remember offhand if there is...
2283
2284 Q1: Is that a light switch? (Unintelligible).
2285
2286
2287 A: If anything, it's gonna be in the entry doorway like somethin' like this.
2288
2289 Q: Okay.
2290
2291
2292 A: You know, like right there.
2293
2294 Q: Okay.
2295
2296
2297 A: 'Cause that's where most of them are.
2298
2299 Q1: Yeah, they're usually right when you walk in the door.
2300

2301 Q: And...

2302

2303

2304 A: Yeah, right when you walk in.

2305

2306 Q: Do you - so there's, like, a privacy screen, like a black part...

2307

2308

2309 A: Yeah, it's just a - yeah.

2310

2311 Q: Was that untar- like was it open?

2312

2313

2314 A: When I ran in, it was closed.

2315

2316 Q: All the way?

2317

2318

2319 A: Uh, I don't...

2320

2321 Q: Do you remember?

2322

2323

2324 A: ...I - yeah, I can't tell you if it was, or it wasn't.

2325

2326 Q: Could you see what was goin' on before you got in, or did you have to move it

2327 outta your way?

2328

2329

2330 A: I don't remember.

2331

2332 Q: Okay.

2333

2334

2335 A: You know, I'm tryin' to see...

2336

2337 Q: It just happened too quick?

2338

2339

2340 A: You know, I responded and, you know, ran in, I can't remember like...

2341

2342 Q1: And you had responded w- to the screams you heard?
2343
2344
2345 A: Yes.
2346
2347 Q1: All right. And those were the screams of or Broussard?
2348
2349
2350 A: I - that's just it, I don't know who it was. I just heard screaming from the back,
2351 so I'm thinking, "Okay, let me run back there."
2352
2353 Q: And then, when you said, that uh, she was saying like, "Hey honey, calm
2354 down" the way you said it to me sounded sarcastic. Uh, what...
2355
2356
2357 A: Yeah, it a- you know, I mean, to me, I'm thinking "Really?" You know, "Y-
2358 you're talkin' to her like you're talkin' to one of your kids or something, and
2359 you're over here putting a foot to her chest and - and chokin' her out." You
2360 know? And so I'm thinkin'...
2361
2362 Q1: So it sounds like it's one of these things that, you're only verbalizing things to
2363 appease the ears around you.
2364
2365
2366 A: Outside, right.
2367
2368 Q1: Exactly.
2369
2370
2371 A: Uh-huh.
2372
2373 Q1: So you can do what wanna...
2374
2375
2376 A: Want to do.
2377
2378 Q1: Is that exactly what you...
2379
2380
2381 A: That's how I felt.
2382
2383 Q1: Okay.

2384

2385 Q: Um...

2386

2387

2388 A: Yeah.

2389

2390 Q: ...so at W4C at CCW where Simpson-Hogan was, how long does it take you
2391 to walk from there?

2392

2393 A: If you just walking?

2394

2395 Q: Yeah.

2396

2397 A: Mmm, two or three minu- three minutes, four minutes, I don't know.

2398

2399 Q: Doesn't take that long?

2400

2401 A: No.

2402

2403 Q: Okay.

2404

2405 A: No.

2406

2407 Q: Um, how many doors do you have to go through?

2408

2409 A: You go through the c- C Unit, come in, uh, the sally port kinda door, into
2410 CCW control, then you have two sally ports, I mean two doors right in front
2411 of CCW control, and then the outside one that takes you out of W4. So you
2412 have one, two, three, four, five doors.

2413

2414 Q: And do you have to use a key to open these, is someone buzzing you in?

2415

2416 A: Uh, C Unit Officer does - I have a th- our - Rover has the key to open up the -
2417 not the C Unit, C Unit, the officer has to be popped out or in.

2418

2419 Q: Who's doin' that?

2420

2421 A: ...unless I have - it has to be either you - one well you - if you know you're
2422 walking out, you'll pop the door and then walk out.

2423

2424 Q: Okay.

2425

2426 A: Or y- the officer that's there inside with you.
2427
2428 Q: Okay.
2429
2430 Q1: Has to be done with the panel, at the officer station?
2431
2432 A: It has to be done from the panel at the officer station.
2433
2434 Q: So the - probably the trainee...
2435
2436 A: Right.
2437
2438 Q: ...has the...
2439
2440 A: Or she popped it ou- you know, popped in, 'cause she knew that she was
2441 walkin' out...
2442
2443 Q: Okay.
2444
2445 A: ...you know? 'Cause we do it all the time.
2446
2447 Q1: Yeah, you pop 'em in?
2448
2449 A: Yeah. And then but the door that's going towards CCW control has to be
2450 popped by CCW control...
2451
2452 Q1: Okay.
2453
2454 A: ...and the - all three doors going out.
2455
2456 Q: Let's, uh, so after this happened, was reclassified as a Level Four?
2457
2458 A: Yes.
2459
2460 Q: Originally she was a Level 1?
2461
2462 A: One.
2463
2464 Q: Do you th- do you think that her - the behavior that she was exhibiting in that
2465 struggle justified a Level 4?
2466

2467 A: It - in - my whole thing is that, if it wouldn't - it - it sh- it shouldn't have even
2468 happened in the first place. So if it didn't happen, she wouldn't have been put
2469 in that position. Okay, you could have been a little, you know, squirmy or
2470 whatever, or have an attitude or whatever she wanted to, I could have made
2471 her a Level 2 and put her in, you know, side to it, as opposed to givin' her the
2472 freedom...
2473
2474 Q1: (Unintelligible) she's not Level 4, she was a W4, right?
2475
2476 A: But she was in - she's in 4C now.
2477
2478 Q1: Yeah.
2479
2480 A: Yeah.
2481
2482 Q: She's in po-...
2483
2484 Q1: Now she's out there with...
2485
2486 A: They didn't make her a level...
2487
2488 Q1: ...Simpson.
2489
2490 Q: She's in Pod 1...
2491
2492 A: She's in there with...
2493
2494 Q: ...south seven, yeah.
2495
2496 A: Yeah, in C Unit. Yeah.
2497
2498 Q: Yeah.
2499
2500 Q1: It's not - she ca- she can't go to W2 or anything like that, it'd be
2501 (unintelligible) program now?
2502
2503 A: No.
2504
2505 Q: So...
2506
2507 A: Uh-huh.
2508

2509 Q: ...what - what gets her to W4? Is there a documentation?
2510
2511 A: Yeah. A classi- I mean, classification would have to, um, justify her actions.
2512
2513 Q1: Who - who did the...
2514
2515 A: So...
2516
2517 Q1: ...re-class for 'em?
2518
2519 A: Th- uh, it had to be Broussard, 'cause all I wrote was in ER.
2520
2521 Q1: All right.
2522
2523 A: Yeah.
2524
2525 Q: And...
2526
2527 A: Broussard or Simpson-Hogan, one of the two.
2528
2529 Q: ...let's say hypothetically there's documentation somewhere that says
2530 was punching and striking...
2531
2532 A: Uh-huh. Then classification...
2533
2534 Q: ...a - a deputy...
2535
2536 A: ...would read the documentation, and if that's what they're seeing and - and
2537 goin' by what the officer...
2538
2539 Q: Said?
2540
2541 A: ...said...
2542
2543 Q: They'll just take it at face value?
2544
2545 A: ...they take it at s- face value and say, "Okay, well...
2546
2547 Q: Yeah.
2548
2549 A: ...and...
2550

2551 Q: And...

2552

2553 A: been in - she is a repeat offender, she's been...

2554

2555 Q1: (Unintelligible)...

2556

2557 A: Yeah, she's been in...

2558

2559 Q1: ...classify her as 4C.

2560

2561 Q: She w- she's in a...

2562

2563 A: ...the one time...

2564

2565 Q: ...she's a prior escapee, so that's not surprising she's there, but...

2566

2567 A: Uh-huh.

2568

2569 Q: ...um, if there's a documentation that says, "Hey, she's punching me, she was kicking me."

2570

2571

2572 A: Right.

2573

2574 Q: Is i-...

2575

2576 A: Classification would have that.

2577

2578 Q: Do you think that would be a lie if s- if uh...

2579

2580 A: At the time that - while was in there, she wasn't, um, pu- tryin' to punch anybody or hit anybody, she was just tryin' to get free of what was going on.

2581

2582

2583 Q: Did you hear any of the deputies in there, or officers, complain that she had punched or kicked?

2584

2585

2586 A: No, uh-uh.

2587

2588 Q: If...

2589

2590 A: No.

2591

2592 Q: If a inmate punches or kicks you, do you document any of that in a crime
2593 report?
2594
2595 A: Well, yeah.
2596
2597 Q: Not just a like - not just a use of..
2598
2599 A: Well...
2600
2601 Q: ...force report, like, do you, like, charge them with a new crime?
2602
2603 A: Well that would be up to the officer and say, "Okay, well yeah, I wanna
2604 charge you it with it."
2605
2606 Q: Is that common or is that uncommon?
2607
2608 A: Oh yeah. I mean, th- uh, you'll - you'll tell Sarge, "Hey, you know, hey, she
2609 did kick me or whatever?" Or you know, like somebody, um, gases you, even
2610 if it's water or whatever, it's up to you as the officer if you wanna go ahead
2611 and - and press charges.
2612
2613 Q: And did you...
2614
2615 A: And write the prime...
2616
2617 Q: ...does the officer write the report, and then like...
2618
2619 A: Yeah, and...
2620
2621 Q: ...an incident report?
2622
2623 A: ...and you as officer, w- yeah.
2624
2625 Q1: Now, and this you just do an IR or ADR?
2626
2627 A: A- an employee's report.
2628
2629 Q1: You do an ER?
2630
2631 A: That's what I wrote, right.
2632

2633 Q: Okay.
2634
2635 A: Uh-huh. But we get an IR number, an incident report number's.
2636
2637 Q: Sure.
2638
2639 A: That's why o- you know, that's why I said IR. Yeah.
2640
2641 Q: Okay.
2642
2643 A: Uh-huh.
2644
2645 Q: Um, so here's kinda the - there's gonna be the difficult part for you, in every
2646 criminal investigation, right? There's...
2647
2648 A: I'm not allowed to say anything.
2649
2650 Q: Uh, we'll get - we're gettin' there, um, in something where there's no video,
2651 and you got...
2652
2653 A: Uh-huh.
2654
2655 Q: ...one person saying something, and another person saying something.
2656
2657 A: Uh-huh.
2658
2659 Q: I haven't talked to either Simpson or uh, or the other one.
2660
2661 A: Uh-huh.
2662
2663 Q: Um, yeah, but I'm assuming, based on my experience, they're gonna tell me
2664 something completely different.
2665
2666 A: Uh-huh.
2667
2668 Q: Right? Um, and that's fine, that's what - this is how this always goes.
2669
2670 A: Uh-huh.
2671
2672 Q: Um, just be prepared for that - that - that may happen.
2673
2674 A: Yeah.

2675
2676 Q: I'm hoping everyo- in a perfect world, everyone will tell me the truth, and...
2677
2678 A: Uh-huh.
2679
2680 Q: ...we'll move on from this. Um, I do- I honestly don't know where this is
2681 gonna lead, um, just based on what you're telling me, you know, you're - you
2682 think it's a crime. It sounds like you're hesitant, like maybe like, borderline
2683 like...
2684
2685 A: E- no...
2686
2687 Q: ...clearly like, policy stuff...
2688
2689 A: Uh-huh.
2690
2691 Q: Right?
2692
2693 A: Was violated.
2694
2695 Q: But it doesn't sound like she wa- you know, she wasn't injured.
2696
2697 A: Uh-huh.
2698
2699 Q: It wasn't overboard...
2700
2701 A: Right.
2702
2703 Q: ...punching or kicking or anything like that...
2704
2705 A: Uh-huh.
2706
2707 Q: Um, so we'll see where it goes.
2708
2709 A: Mm-hm.
2710
2711 Q: We'll keep you informed on, um, on the investigation as much as I can.
2712 Obviously, I can't share with you what other people tell me. Um, but I can
2713 share with you what I'm gonna do at the end.
2714
2715 A: Mm-hm.
2716

2717 Q: If the DA y- you know, at the very end I'm gonna take everything everyone
2718 said, all the evidence I gather, it's gonna go to the District Attorney, and
2719 they're gonna read the report, and they're gonna decide whether or not they
2720 think they can - if criminal charges will apply.

2721
2722 A: Mm-hm.

2723
2724 Q: At the end of all that, everything I do ends up with Internal Affairs, and then
2725 they do their - their spiel.

2726
2727 A: Mmm.

2728
2729 Q: And I have nothing to do with whatever they'll do. Um, in the meantime, do
2730 not talk to anyone about anything we discussed.

2731
2732 A: Mm-hm.

2733
2734 Q: Um, and that should be it. Hopefully, everything will be good for you, and
2735 you don't have to work on - with her in the near future.

2736
2737 A: Oh no, I - I'm pretty good on my team. So.

2738
2739 Q: It's all about who you work with, right?

2740
2741 A: Yeah. Yeah. Well...

2742
2743 Q: That's what makes the...

2744
2745 A: Yeah, it's, uh.

2746
2747 Q: ...makes work that much better.

2748
2749 A: Yeah.

2750
2751 Q: Sarge, you got anything?

2752
2753 Q1: I'm good.

2754
2755 Q: Okay.

2756
2757 A: Yeah. Okay. Thank you.

2758

2759 Q: Thank you so much for your time.

2760

2761 Q1: Thank you.

2762

2763 Q: Have a safe trip back.

2764

2765 Q1: (Unintelligible) your honesty. We really do appreciate it.

2766

2767 A: Yeah. Thank you. Oh (unintelligible).

2768

2769

2770 This transcript has been reviewed with the audio recording submitted and it is an accurate

2771 transcription.

2772 Signed _____