

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:14-cv-02887-JLK

RULE 30(b)(6) DEPOSITION OF:
DAWN CEJA - March 29, 2016
The GEO Group, Inc.

ALEJANDRO MENOCA, et al.,
Plaintiffs,
v.
THE GEO GROUP, INC.,
Defendant.

PURSUANT TO NOTICE, the Rule 30(b)(6) deposition of DAWN CEJA, THE GEO GROUP, INC., was taken on behalf of the Plaintiffs at 600 Grant Street, Suite 450, Denver, Colorado 80203, on March 29, 2016, at 9:34 a.m., before Darcy Curtis, Registered Professional Reporter and Notary Public within Colorado.



Hunter + Geist, Inc.

303.832.5966
800.525.8490

1900 Grant Street, Suite 1025
Denver, CO 80203

■ www.huntergeist.com
■ scheduling@huntergeist.com

Your Partner in Making the Record

<p style="text-align: center;">1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO</p> <p>Civil Action No. 1:14-cv-02887-JLK</p> <hr/> <p style="text-align: center;">RULE 30(b)(6) DEPOSITION OF: DAWN CEJA - March 29, 2016 The GEO Group, Inc.</p> <hr/> <p>ALEJANDRO MENOCA, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>THE GEO GROUP, INC.,</p> <p>Defendant.</p> <hr/> <p>PURSUANT TO NOTICE, the Rule 30(b)(6) deposition of DAWN CEJA, THE GEO GROUP, INC., was taken on behalf of the Plaintiffs at 600 Grant Street, Suite 450, Denver, Colorado 80203, on March 29, 2016, at 9:34 a.m., before Darcy Curtis, Registered Professional Reporter and Notary Public within Colorado.</p>	<p style="text-align: center;">3</p> <p style="text-align: center;">I N D E X</p> <p>EXAMINATION OF DAWN CEJA: PAGE March 29, 2016</p> <p>By Mr. Free 5</p> <p>* REQUEST BY MR. FREE Pages 73, line 22 through 76, line 25</p> <p>DEPOSITION EXHIBITS: INITIAL REFERENCE</p> <p>Exhibit 1 Amended Notice of FRCP 30(b)(6) Deposition of Defendant The GEO Group, Inc. 5</p> <p>Exhibit 2 Defendant's Initial 26(a)(1) Disclosures, with attachments 32</p> <p>Exhibit 3 Aurora/ICE Processing Center, Policy and Procedure Manual, Sanitation, 12.1.4-AUR 41</p> <p>Exhibit 4 Clean-Up Lists 82</p> <p>Exhibit 5 Detainee Handbook, PL000051 through PL000055 87</p> <p>Exhibit 6 Memorandum to Special Management Unit from IDP (Hearing Panel), 10/24/14, with attachments 104</p> <p>Exhibit 7 Attachment #6-ICE voluntary work program form 155</p> <p>Exhibit 8 Aurora Detention Center, Policy and Procedure Manual, Detainee Work Program, 8.1.8-AUR, with attachment 158</p> <p>Exhibit 9 (CONFIDENTIAL) Letter to Sanchez from Choate, 12/10/12, with attachments 177</p>
<p style="text-align: center;">2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>For the Plaintiffs:</p> <p>ANDREW FREE, ESQ. Law Office of R. Andrew Free 1212 7th Avenue North Nashville, Tennessee 37208</p> <p>ALEXANDER HOOD, ESQ. Towards Justice 1535 High Street Suite 300 Denver, Colorado 80218</p> <p>ANDREW H. TURNER, ESQ. Buescher, Kelman, Perera & Turner, P.C. 600 Grant Street Suite 450 Denver, Colorado 80203</p> <p>BRANDT P. MILSTEIN, ESQ. Milstein Law Office 595 Canyon Boulevard Boulder, Colorado 80302</p> <p>For the Defendant:</p> <p>SHELBY A. FELTON, ESQ. Vaughan & DeMuro 720 South Colorado Boulevard Penthouse, North Tower Denver, Colorado 80246</p>	<p style="text-align: center;">4</p> <p>1 WHEREUPON, the following proceedings</p> <p>2 were taken pursuant to the Federal Rules of Civil</p> <p>3 Procedure.</p> <p>4 * * * * *</p> <p>5 DAWN CEJA,</p> <p>6 having been first duly sworn to state the whole truth,</p> <p>7 testified as follows:</p> <p>8 MR. FREE: Okay. Good morning, Ms. Ceja.</p> <p>9 My name is Andrew Free. I am one of the plaintiffs'</p> <p>10 counsel in this case. And before we go any further, I</p> <p>11 think the local rules would like us to identify all of</p> <p>12 the parties. Can you do that, Court Reporter?</p> <p>13 (Discussion off the record.)</p> <p>14 THE COURT REPORTER: Good morning. This</p> <p>15 is Darcy Curtis, the court reporter. The date is</p> <p>16 March 29, 2016, at 9:36 a.m. I am with Hunter +</p> <p>17 Geist, 1900 Grant Street, Suite 1025, Denver,</p> <p>18 Colorado. Present in the room is the deponent, Dawn</p> <p>19 Ceja, as well as counsel.</p> <p>20 MR. FREE: My name is Andrew Free, one of</p> <p>21 the counsel for Mr. Menocal and the plaintiffs in this</p> <p>22 case.</p> <p>23 MR. HOOD: I'm Alexander Hood from</p> <p>24 Towards Justice, and I'm counsel for the plaintiffs as</p> <p>25 well.</p>

5	<p>1 MR. TURNER: Andrew Turner, counsel for 2 plaintiffs. 3 MR. MILSTEIN: Brandt Milstein, counsel 4 for plaintiffs. 5 MS. FELTON: Shelby Felton, counsel for 6 defendant. 7 EXAMINATION 8 BY MR. FREE: 9 Q. And just to be clear, we're here on a 10 deposition under Federal Rules of Civil Procedure 11 30(b)(6). So this was a deposition that was noticed 12 for The GEO Group, which is the defendant in this 13 case. I'll just ask you to open your binder to Tab 1 14 and there you will find the deposition notice, which 15 we will enter as Exhibit 1 to this deposition. 16 (Deposition Exhibit 1 was marked.) 17 Q. Ms. Ceja, The GEO Group has designated 18 you as a witness who is knowledgeable on certain 19 aspects of our 30(b)(6) deposition notice. Is that 20 your understanding? 21 A. Yes. 22 Q. And you're prepared to testify here today 23 on those subjects that GEO has noticed you for; is 24 that right? 25 A. Yes.</p>	7	<p>1 A. I do not. 2 Q. Okay. Well, you've probably heard all of 3 this before, but we'll cover it again just so that 4 we're clear and we're on the same page in terms of the 5 rules of the road that we want to follow today. First 6 of all, this is not an endurance contest. If at any 7 point you need to take a break, you need to use the 8 restroom, you need a sip of water, I would ask that 9 you let me know and we'll take a break. 10 A. Okay. 11 Q. Okay. With one minor exception, if there 12 is a question pending and you have not answered it or 13 completed your answer or there's an objection pending, 14 I would ask that we not take a break while the 15 question is pending. Okay? 16 A. Okay. 17 Q. Is that fair? 18 A. Yes. 19 Q. All right. The second thing that you 20 probably know from being deposed before is that each 21 answer needs to be an audible answer so that the court 22 reporter can record it. And it can't be anything, you 23 know, that is sort of a grunt, like uh-huh or huh-uh, 24 because those look basically the same on a transcript. 25 Okay?</p>
6	<p>1 Q. Before we go any further, have you ever 2 given a deposition before? 3 A. Yes. 4 Q. Do you remember the name of the case or 5 cases in which you've provided a deposition? 6 A. Some of them. 7 Q. About how many times would you say you've 8 been deposed? 9 A. Approximately four or five. 10 Q. Were those in state or federal court? 11 A. District or federal. I don't recall. 12 Q. Do you remember when the last time you 13 were deposed was? 14 A. Approximately two years ago. 15 Q. Okay. Have you ever given a deposition 16 as a 30(b)(6) witness; in other words, a witness that 17 The GEO Group has designated as a person who is 18 knowledgeable in the areas that the other side wanted 19 to know about? 20 A. Yes. 21 Q. How many times have you done that? 22 A. Once. 23 Q. Do you remember what that case was about? 24 A. I do not. 25 Q. Do you remember about when that was?</p>	8	<p>1 A. Yes. 2 Q. The third thing that we need to be 3 mindful of is that if we talk over each other, the 4 court reporter is going to have a hard time knowing 5 who is saying what and when. I would ask that you let 6 me finish my question, and I will definitely try to 7 let you finish your answer. Is that fair? 8 A. Yes. 9 Q. Great. If for any reason you don't 10 understand a question that I ask, if you would be so 11 kind as to tell me. If you answer a question that 12 I've asked, I'm going to assume that you understood 13 it. Is that fair? 14 A. Yes. 15 Q. Okay. If you can't hear me or if there's 16 anything unclear about anything that I've said in 17 terms of terminology or anything like that, just feel 18 free to tell me and I'll try and rephrase it. 19 A. Okay. 20 Q. Okay. Great. Similarly, if you want to 21 correct or modify or expand upon something that you've 22 already said in this deposition, I want you to feel 23 free to let me know that that answer needs to be 24 modified or corrected or expanded. Is that fair? 25 A. Yes.</p>

9

1 **Q. If you think of something later in the**
2 **day about a question that was discussed earlier, feel**
3 **free, please, to go back and say, you know what, I**
4 **need to tell you more about that. Is that fair?**
5 A. Yes.
6 **Q. Great. If we are on a break or if we're**
7 **off the record, it's my understanding the local rules**
8 **here in Colorado forbid us from talking with our**
9 **attorneys about anything other than whether to assert**
10 **a privilege. So I would ask that during our coffee**
11 **breaks or bathroom breaks or lunch break that you not**
12 **discuss any of your testimony with your counsel with**
13 **the exception of the determination about whether a**
14 **privilege should be asserted. Is that fair?**
15 A. Yes.
16 **Q. Can we do that? Great. If you get**
17 **tired, again, let me know. Are you feeling okay**
18 **today?**
19 A. I'm fine. Thank you.
20 **Q. Great. Have you been sick recently?**
21 A. No.
22 **Q. Do you take any medication that would**
23 **affect your memory or your cognition?**
24 A. No.
25 **Q. Have you had any sort of injuries in the**

10

1 **last two years to your brain or to anything that would**
2 **undermine your ability to remember or recall details?**
3 A. No.
4 **Q. Do you understand the instructions we've**
5 **gone over so far?**
6 A. Yes.
7 **Q. Great. It is my understanding that you**
8 **are going to testify today about all of the subjects**
9 **in topic 1, subject -- page 2.**
10 A. Yes.
11 **Q. Can you take a look at that page and**
12 **verify that that's your understanding as well?**
13 A. Yes.
14 **Q. You understand you're testifying on**
15 **behalf of The GEO Group; you're not testifying**
16 **necessarily as to your personal knowledge, but you're**
17 **providing the testimony for The GEO Group?**
18 A. Yes.
19 **Q. Great. It's also my understanding that**
20 **you're going to provide testimony regarding all of the**
21 **sections in topic 2. Is that your understanding as**
22 **well?**
23 A. Yes.
24 **Q. Finally, it's my understanding that you**
25 **will be providing testimony on behalf of The GEO Group**

11

1 **today on topics 3 a, b, c, d, f, g, h, i, j, k, and l.**
2 **Is that your understanding as well?**
3 A. Yes.
4 **Q. Without telling me anything you discussed**
5 **with your lawyer, what did you do to prepare for**
6 **today's deposition?**
7 A. Met with Ms. Felton.
8 **Q. Did you examine any documents in advance**
9 **of today's deposition?**
10 A. Yes.
11 **Q. Which documents did you examine, if any?**
12 A. I don't recall exactly.
13 **Q. Do you remember approximately how many**
14 **documents you examined before today's deposition?**
15 A. A handful.
16 **Q. So somewhere between 10 and 20?**
17 A. Approximately.
18 **Q. And do you know, is that the number of**
19 **pages or the number of separate documents, you would**
20 **say?**
21 A. Separate documents.
22 **Q. Had you seen any of those documents**
23 **before you prepared for today's deposition?**
24 A. Yes.
25 **Q. Was there anything in there you hadn't**

12

1 **seen before?**
2 A. No.
3 **Q. Okay. Did you speak with anyone, again,**
4 **other than your attorney, about the content of today's**
5 **deposition?**
6 A. No.
7 **Q. No discussions with any GEO employees**
8 **about any of the subjects listed in our 30(b)(6)**
9 **deposition notice?**
10 A. No.
11 **Q. And apart from speaking with anyone, did**
12 **you exchange any type of correspondence with any GEO**
13 **employees or anyone else, other than your attorney,**
14 **about the contents of this 30(b)(6) witness notice?**
15 A. No.
16 **Q. Can I ask very briefly, what is your job**
17 **title?**
18 A. Assistant warden of operations.
19 **Q. Why would you say you're qualified to**
20 **testify on behalf of The GEO Group about the topics**
21 **that we have gone over just a moment ago?**
22 A. Due to my tenure with the company.
23 **Q. Well, let's talk through that. When did**
24 **you begin your employment with The GEO Group or its**
25 **predecessor?**

13	<p>1 A. July 1995.</p> <p>2 Q. What was your role when you began?</p> <p>3 A. Detention officer.</p> <p>4 Q. How long did you serve in that position?</p> <p>5 A. Approximately a year.</p> <p>6 Q. Where was your employment?</p> <p>7 A. In Aurora, Colorado.</p> <p>8 Q. Was it at the Aurora Detention Facility?</p> <p>9 A. The original one.</p> <p>10 Q. There's now a separate facility that's</p> <p>11 been constructed since 1995; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. What did you do after you were a</p> <p>14 detention officer?</p> <p>15 A. I was a field training officer.</p> <p>16 Q. What did that involve?</p> <p>17 A. Training other staff members, new staff</p> <p>18 members, that came on.</p> <p>19 Q. How long did you do that?</p> <p>20 A. Approximately a year.</p> <p>21 Q. Okay. What did you do after that?</p> <p>22 A. Sergeant.</p> <p>23 Q. What were your responsibilities as a</p> <p>24 sergeant?</p> <p>25 A. Supervising staff.</p>	15	<p>1 roughly to 1998, 1999; is that about right?</p> <p>2 A. Approximately, yes.</p> <p>3 Q. Then what did you do after you were an</p> <p>4 acting lieutenant?</p> <p>5 A. Training coordinator.</p> <p>6 Q. For the Aurora Detention Facility?</p> <p>7 A. Yes.</p> <p>8 Q. How long did you serve as a training</p> <p>9 coordinator?</p> <p>10 A. About a year.</p> <p>11 Q. And what were your responsibilities as a</p> <p>12 training coordinator?</p> <p>13 A. I would train all new staff that were</p> <p>14 coming into the facility.</p> <p>15 Q. On what?</p> <p>16 A. Various topics that were required by</p> <p>17 contract and ACA.</p> <p>18 Q. When you refer to a contract, what do you</p> <p>19 mean?</p> <p>20 A. The contract that the facility had with</p> <p>21 Immigration and Naturalization Service, at the time</p> <p>22 was INS.</p> <p>23 Q. And when you say ACA, do you mean the</p> <p>24 American Correctional Association?</p> <p>25 A. Yes.</p>
14	<p>1 Q. How many people would you say you</p> <p>2 supervised?</p> <p>3 A. On a shift, maybe average 15 to 20.</p> <p>4 Q. Did you work full time?</p> <p>5 A. Yes.</p> <p>6 Q. How many days a week did you work?</p> <p>7 A. Five.</p> <p>8 Q. After you supervised people as a</p> <p>9 sergeant, what did you do?</p> <p>10 A. I was an acting lieutenant.</p> <p>11 Q. How long did you serve as a sergeant?</p> <p>12 A. Approximately a year.</p> <p>13 Q. Okay. So then you were promoted again to</p> <p>14 acting lieutenant?</p> <p>15 A. Yes.</p> <p>16 Q. How long were you an acting lieutenant?</p> <p>17 A. Approximately six months.</p> <p>18 Q. What were your responsibilities?</p> <p>19 A. Supervising.</p> <p>20 Q. Okay. Supervising what, supervising --</p> <p>21 A. Staff.</p> <p>22 Q. Okay. How many people would you say you</p> <p>23 supervised then?</p> <p>24 A. Approximately 20, 25.</p> <p>25 Q. All right. So that should get us up</p>	16	<p>1 Q. Was there anybody else responsible for</p> <p>2 training during the period that you served in that</p> <p>3 role?</p> <p>4 A. I was responsible for all of the</p> <p>5 classroom training, and then the FTOs, the field</p> <p>6 training officers, would do the on-the-job training on</p> <p>7 the floor.</p> <p>8 Q. Approximately how many people would you</p> <p>9 say you trained?</p> <p>10 A. Roughly a hundred.</p> <p>11 Q. It's fair to say that every person who</p> <p>12 was employed there was at least trained in the</p> <p>13 classroom by you; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. What did you do after you were the</p> <p>16 training supervisor or coordinator?</p> <p>17 A. I was the accreditation fire safety</p> <p>18 manager.</p> <p>19 Q. How long did you do that?</p> <p>20 A. About a year.</p> <p>21 Q. Okay. And what were your</p> <p>22 responsibilities then?</p> <p>23 A. I was responsible for all of the fire</p> <p>24 suppression equipment, ensuring that all of the fire</p> <p>25 and life safety issues were addressed, and ensuring</p>

<p style="text-align: right;">17</p> <p>1 that the facility made it through accreditation, which</p> <p>2 would occur every three years, and that all of our</p> <p>3 standards were met and that we had documentation to</p> <p>4 meet those standards.</p> <p>5 Q. What was the accrediting body?</p> <p>6 A. I'm sorry. I didn't hear you.</p> <p>7 Q. What was the accrediting body?</p> <p>8 A. American Correctional Association.</p> <p>9 Q. Was there ever a time when the standards</p> <p>10 were not met?</p> <p>11 A. No.</p> <p>12 Q. Was there ever a time when the facility</p> <p>13 was noted for deficiencies even though they met the</p> <p>14 standards for accreditation?</p> <p>15 A. I'm not sure I follow your question.</p> <p>16 Q. In other words, did there come a time</p> <p>17 when you were responsible for accreditation where even</p> <p>18 though the facility was accredited, the ACA said we</p> <p>19 need to fix this, this, and this in terms of</p> <p>20 deficiencies?</p> <p>21 A. Not that I recall.</p> <p>22 Q. What did you do after you were the</p> <p>23 accreditation manager?</p> <p>24 A. I was the chief of security.</p> <p>25 Q. When did you begin that position</p>	<p style="text-align: right;">19</p> <p>1 Q. So that gets us up to 2005?</p> <p>2 A. Yes.</p> <p>3 Q. And then what did you do?</p> <p>4 A. Assistant warden of operations.</p> <p>5 Q. So that was another promotion?</p> <p>6 A. Yes.</p> <p>7 Q. And how did your duties change, if at</p> <p>8 all, when you were promoted to assistant warden?</p> <p>9 A. Higher level of supervision.</p> <p>10 Q. How many people did you supervise?</p> <p>11 A. Currently it's around 175, give or take.</p> <p>12 Q. Is that everyone at the facility who is</p> <p>13 employed?</p> <p>14 A. That's all inclusive except for the</p> <p>15 maintenance department and the fire safety manager and</p> <p>16 the accreditation manager.</p> <p>17 Q. Who supervises them?</p> <p>18 A. The warden.</p> <p>19 Q. Directly?</p> <p>20 A. Correct, that's a direct report.</p> <p>21 Q. What does the maintenance department do?</p> <p>22 A. They do the upkeep, all preventive</p> <p>23 maintenance on all of the systems.</p> <p>24 Q. What do you mean when you say systems?</p> <p>25 A. You know, from rooftop units, changing</p>
<p style="text-align: right;">18</p> <p>1 approximately?</p> <p>2 A. August of 2000.</p> <p>3 Q. And what did those job duties include?</p> <p>4 A. I was responsible for oversight of all of</p> <p>5 the detention officers, the maintenance department,</p> <p>6 classification, and the programs department.</p> <p>7 Q. How many people would you say you were</p> <p>8 supervising?</p> <p>9 A. About a hundred.</p> <p>10 Q. Okay. How many people were employed at</p> <p>11 the facility at that time?</p> <p>12 A. All inclusive, maybe 150, 160, 170.</p> <p>13 Q. Who were the people that you didn't</p> <p>14 supervise?</p> <p>15 A. The business office and human resources.</p> <p>16 Q. Okay. How many people were above you in</p> <p>17 your chain of command when you were the chief of</p> <p>18 security?</p> <p>19 A. Two.</p> <p>20 Q. Who were those people?</p> <p>21 A. The assistant warden of operations and</p> <p>22 the warden.</p> <p>23 Q. And for how long did you serve as the</p> <p>24 chief of security?</p> <p>25 A. Five years.</p>	<p style="text-align: right;">20</p> <p>1 filters, changing lightbulbs.</p> <p>2 Q. Approximately how many people work in the</p> <p>3 maintenance department?</p> <p>4 A. Three.</p> <p>5 Q. What do you mean by "upkeep"? You may</p> <p>6 have already sort of told me the answer to that, but</p> <p>7 is there anything else that is included in upkeep?</p> <p>8 A. Ensuring all of the systems are running</p> <p>9 smoothly.</p> <p>10 Q. Okay. What systems, again, are you</p> <p>11 talking about?</p> <p>12 A. Air-conditioning units, heating systems,</p> <p>13 HVAC.</p> <p>14 Q. Is it the physical plant or the physical</p> <p>15 structure and the guts of the building that they're</p> <p>16 responsible for making sure is maintained?</p> <p>17 A. Yes.</p> <p>18 Q. Not the computers?</p> <p>19 A. No.</p> <p>20 Q. Do you have any idea why that supervision</p> <p>21 is separate?</p> <p>22 A. I do not.</p> <p>23 Q. Okay. Now, have you done any other jobs</p> <p>24 since joining GEO in 1995?</p> <p>25 A. I was a part-time paralegal.</p>

21	<p>1 Q. Have you ever been suspended or</p> <p>2 disciplined?</p> <p>3 A. No.</p> <p>4 Q. Probably not with all of your promotion</p> <p>5 history, right?</p> <p>6 A. None.</p> <p>7 Q. What's your educational background?</p> <p>8 A. I have an associate's degree in general</p> <p>9 studies with an emphasis in criminal justice, I have a</p> <p>10 bachelor's degree in criminal justice and criminology,</p> <p>11 and a paralegal certificate.</p> <p>12 Q. From what institution did you obtain your</p> <p>13 associate's agree?</p> <p>14 A. Community College of Aurora.</p> <p>15 Q. And what about your bachelor's?</p> <p>16 A. Metro.</p> <p>17 Q. What in Metro?</p> <p>18 A. Sorry. Metropolitan University of</p> <p>19 Denver.</p> <p>20 Q. Thank you. What about your paralegal</p> <p>21 certificate?</p> <p>22 A. Denver Paralegal Institute.</p> <p>23 Q. What made you want to work part time as a</p> <p>24 paralegal?</p> <p>25 A. It just fascinated me, and it appeared to</p>	23
22	<p>1 go kind of hand in hand with the criminal justice</p> <p>2 aspect.</p> <p>3 Q. How long did you do that?</p> <p>4 A. About two years.</p> <p>5 Q. What period of time did that happen?</p> <p>6 A. Early 2000s.</p> <p>7 Q. Okay. Approximately how many hours a</p> <p>8 week did you work in that position?</p> <p>9 A. About 20.</p> <p>10 Q. Okay. Do you receive a paycheck from</p> <p>11 GEO?</p> <p>12 A. I do.</p> <p>13 Q. Okay. Have you ever received a paycheck</p> <p>14 from ICE?</p> <p>15 A. No.</p> <p>16 Q. By "ICE," it's the abbreviation for</p> <p>17 Immigration and Customs Enforcement, I-C-E. If I use</p> <p>18 ICE going forward, that's what we're talking about.</p> <p>19 Which ICE officials supervise you?</p> <p>20 A. No ICE supervisors supervise me.</p> <p>21 Q. Okay. Which ICE officials have the</p> <p>22 authority to hire or fire you?</p> <p>23 A. None.</p> <p>24 Q. Who has the authority to hire and fire</p> <p>25 you?</p>	24
21	<p>1 A. My warden.</p> <p>2 Q. That's it?</p> <p>3 A. Yes.</p> <p>4 Q. All right. What employment documents, if</p> <p>5 any, have you signed with Immigration and Customs</p> <p>6 Enforcement?</p> <p>7 A. None.</p> <p>8 Q. Okay. Now, during your time in all of</p> <p>9 these positions, have you had direct participation in</p> <p>10 the execution of the housing unit sanitation policy at</p> <p>11 the Aurora Detention Facility?</p> <p>12 A. I'm not sure what you mean by direct</p> <p>13 execution.</p> <p>14 Q. Have you been responsible for ensuring</p> <p>15 that the policy was followed?</p> <p>16 A. Yes.</p> <p>17 Q. Have you ensured the detainees were</p> <p>18 abiding by the policy?</p> <p>19 A. Yes.</p> <p>20 Q. Have you played any role in the</p> <p>21 formulation of the policies as the years went on?</p> <p>22 A. At times.</p> <p>23 Q. What was that role?</p> <p>24 A. Policy review.</p> <p>25 Q. Okay. Anything else?</p>	24

25	<p>1 Q. Anything else?</p> <p>2 A. No.</p> <p>3 Q. So by keeping their living area clean,</p> <p>4 you're discussing making their beds, avoiding any food</p> <p>5 from laying around, making sure their clothes are</p> <p>6 folded neatly in their lockers, perhaps, and then not</p> <p>7 hanging any pictures on the walls. You can't think of</p> <p>8 anything else that cleaning up their living area</p> <p>9 entails under the housing unit sanitation policy?</p> <p>10 A. Any personal items should be kept in</p> <p>11 their foot locker, no trash or debris should be laying</p> <p>12 around.</p> <p>13 Q. Anything else?</p> <p>14 A. No.</p> <p>15 Q. How many different living areas are there</p> <p>16 at the Aurora Detention Facility?</p> <p>17 A. Do you mean how many like housing --</p> <p>18 separate housing units?</p> <p>19 Q. I guess I don't know what you mean by</p> <p>20 living area, so I'm just trying to understand what you</p> <p>21 mean when you say keeping your living area clean. It</p> <p>22 sounds like you're discussing the bed and your</p> <p>23 personal items around your bed. So maybe we're</p> <p>24 talking about beds, but maybe you mean something else.</p> <p>25 I'm just trying to understand.</p>	27	<p>1 A. That includes medical and E unit, yes.</p> <p>2 Q. Okay. There's no C unit for immigrants?</p> <p>3 A. Not for ICE, no.</p> <p>4 Q. And no F or G unit?</p> <p>5 A. No.</p> <p>6 Q. When an ICE detainee is subject to this</p> <p>7 housing unit sanitation policy, can you explain to me,</p> <p>8 please, who is creating this policy.</p> <p>9 A. So the policy is pieces of ACA</p> <p>10 requirements, PBNDS, the ICE Performance-Based</p> <p>11 National Detention Standards, and sometimes pieces of</p> <p>12 corporate GEO policy. So we take all of these</p> <p>13 requirements and we put them into a site-specific</p> <p>14 policy.</p> <p>15 Q. Who is "we"?</p> <p>16 A. The facility.</p> <p>17 Q. And in that case, this is the Aurora</p> <p>18 facility?</p> <p>19 A. Yes.</p> <p>20 Q. And is that GEO?</p> <p>21 A. The Aurora facility.</p> <p>22 Q. When you're talking about we, you're</p> <p>23 discussing The GEO Group?</p> <p>24 A. I am saying the Aurora staff. Every GEO</p> <p>25 facility is different, so I am only referring to</p>
26	<p>1 A. For ICE housing units, I would say</p> <p>2 approximately 13 units.</p> <p>3 Q. How many different beds are there within</p> <p>4 those 13 units?</p> <p>5 A. It varies. The large ones contain 80.</p> <p>6 Q. Okay. Do you sometimes call those units</p> <p>7 Pods?</p> <p>8 A. Sometimes, yes.</p> <p>9 Q. What else do you use to refer to them?</p> <p>10 A. Housing unit.</p> <p>11 Q. What are they named in order to</p> <p>12 differentiate them? In other words, you don't call</p> <p>13 each housing unit a housing unit. You may use a</p> <p>14 letter or a name system. How does that work?</p> <p>15 A. They're each annotated with a letter and</p> <p>16 a number.</p> <p>17 Q. What are the letters and numbers?</p> <p>18 A. One section are the A units, one section</p> <p>19 are B units, another section is D, as in David,</p> <p>20 another section is E, as in Edward, medical area.</p> <p>21 Q. Anything else?</p> <p>22 A. Not regarding immigration, no.</p> <p>23 Q. Okay. So I think you told me a moment</p> <p>24 ago that for immigration at the Aurora Detention</p> <p>25 Facility, there are 13 units?</p>	28	<p>1 Aurora.</p> <p>2 Q. That's all I want you to discuss for the</p> <p>3 purposes of this question.</p> <p>4 A. Okay.</p> <p>5 Q. I'm asking: Do you know the name of the</p> <p>6 person or the people, names of the people, who take</p> <p>7 these three sources of the policy and put them</p> <p>8 together?</p> <p>9 A. It changes. Currently we have our</p> <p>10 accreditation manager that does our policy review.</p> <p>11 Q. Anybody else?</p> <p>12 A. Everybody will review a policy, and if</p> <p>13 they have additions or things that need to be deleted,</p> <p>14 that's what I refer to as a policy review. It's a</p> <p>15 group. Then the final policy is reviewed by the</p> <p>16 warden and signed off when it's done by the warden and</p> <p>17 by immigration.</p> <p>18 Q. Who is "we" in the policy review group?</p> <p>19 A. Usually the department heads, so it could</p> <p>20 be myself, the program manager, the accreditation</p> <p>21 manager, the chief of security. Usually people more</p> <p>22 in the upper echelon.</p> <p>23 Q. How often does that happen?</p> <p>24 A. Annually.</p> <p>25 Q. Who at ICE signs off on the policy?</p>

29	<p>1 A. The COTAR, the contracting officer's</p> <p>2 technical representative.</p> <p>3 Q. Do you know which version of the</p> <p>4 Performance-Based National Detention Standards the</p> <p>5 policy is currently drawn from?</p> <p>6 A. Currently we are going off of the 2011,</p> <p>7 and then I think there's been some adjustments on</p> <p>8 there that are from 2013.</p> <p>9 Q. Do you happen to know which version of</p> <p>10 the Performance-Based National Detention Standard</p> <p>11 governs the current contract between ICE and GEO?</p> <p>12 A. The same ones that I just said.</p> <p>13 Q. Okay. The housing unit sanitation policy</p> <p>14 applies to all ICE detainees at the Aurora Detention</p> <p>15 Facility, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Are they provided a copy of this policy?</p> <p>18 A. No.</p> <p>19 Q. What are they provided in order to know</p> <p>20 how they need to comply?</p> <p>21 A. They, upon initial admission, review a</p> <p>22 PowerPoint presentation as an orientation video. They</p> <p>23 receive a handbook, a local supplement handbook, and</p> <p>24 they also receive an ICE handbook. In each housing</p> <p>25 unit are bulletin boards, and we post notices and</p>	31	<p>1 Q. Are there separate policies provided in</p> <p>2 English and Spanish to each detainee?</p> <p>3 MS. FELTON: Object to form.</p> <p>4 Q. (BY MR. FREE) I'm going to strike that.</p> <p>5 The documents that the detainees receive upon</p> <p>6 admission to your facility, do they appear in English</p> <p>7 and Spanish in the same document, or are they provided</p> <p>8 two separate documents containing the housing unit</p> <p>9 sanitation policy?</p> <p>10 A. Depending on what language they prefer,</p> <p>11 they are asked. So if they say Spanish, we provide</p> <p>12 them the Spanish handbook. If they say English, we</p> <p>13 provide them the English handbook. And then each</p> <p>14 individual detainee signs for those documents.</p> <p>15 Q. Okay. And that signature remains in the</p> <p>16 detainee's file; is that correct?</p> <p>17 A. Yes, in the detention file.</p> <p>18 Q. Now, under the housing unit sanitation</p> <p>19 policy, you've outlined some tasks the detainees are</p> <p>20 responsible for. You told me you can't think of any</p> <p>21 other tasks. As you've thought about these other</p> <p>22 documents, these initial orientation documents, the</p> <p>23 documents that are provided in the ICE handbook, the</p> <p>24 documents that are provided in the PowerPoint or the</p> <p>25 information provided in the PowerPoint, can you think</p>
30	<p>1 things along such as that on those housing unit</p> <p>2 bulletin boards.</p> <p>3 Q. Is it a separate PowerPoint and video?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And that PowerPoint includes</p> <p>6 information about the housing unit sanitation policy,</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. Have you seen the video?</p> <p>10 A. I initially put the original one</p> <p>11 together, yes.</p> <p>12 Q. You were responsible for compiling it.</p> <p>13 Do you know if that's the one that's used right now?</p> <p>14 A. There have been updates to it.</p> <p>15 Q. Okay. Do you know what information it</p> <p>16 provides detainees regarding the housing unit</p> <p>17 sanitation policy?</p> <p>18 A. I would have to review it again to give</p> <p>19 you accurate information.</p> <p>20 Q. Okay. Can you remember anything about</p> <p>21 what it says?</p> <p>22 A. No.</p> <p>23 Q. Do you know what languages it's brought</p> <p>24 in?</p> <p>25 A. English and Spanish.</p>	32	<p>1 of anything else that the detainees are informed about</p> <p>2 what they have to do to comply with the housing unit</p> <p>3 sanitation policy?</p> <p>4 A. Not outside of the housing unit, no.</p> <p>5 Q. I would like you to take a look in Tab 7</p> <p>6 of the binder in front of you. And we're going to</p> <p>7 turn -- we're going to make Tab 7 Exhibit 2 to this</p> <p>8 deposition.</p> <p>9 (Deposition Exhibit 2 was marked.)</p> <p>10 Q. I'm going to represent to you that Tab 7</p> <p>11 includes documents that The GEO Group has provided to</p> <p>12 the plaintiffs' counsel that are marked GEO_MEN and</p> <p>13 they begin with the No. 1 and they continue through</p> <p>14 the No. 159. That's at the end of Tab 7 right before</p> <p>15 Tab 8. We're going to call those Bates numbers. So</p> <p>16 if I use that, you know what that means.</p> <p>17 A. Yes.</p> <p>18 Q. If you would turn to what's marked as 55,</p> <p>19 page 55 -- it's on the side, so you will have to turn</p> <p>20 your binder 90 degrees -- do you recognize what's in</p> <p>21 front of you?</p> <p>22 A. Yes.</p> <p>23 Q. What is that?</p> <p>24 A. A page of the detainee handbook.</p> <p>25 Q. You can turn to the previous page. And</p>

33	<p>1 at the top left-hand corner, it says, "ICE Detainee Handbook."</p> <p>2</p> <p>3 A. Yes. However, I'm not sure which year</p> <p>4 this is.</p> <p>5 Q. Okay. Would it make a difference for the</p> <p>6 answers?</p> <p>7 A. Not necessarily. However, it is reviewed</p> <p>8 annually.</p> <p>9 Q. Sure. I'll tell you what. If you see</p> <p>10 this policy and something sticks out at you as not</p> <p>11 being current or not accurately reflecting GEO's</p> <p>12 policies about the housing unit sanitation, let me</p> <p>13 know.</p> <p>14 A. Okay.</p> <p>15 Q. Is that fair?</p> <p>16 A. Yes.</p> <p>17 Q. We'll work off of this document. If we</p> <p>18 need to change it, just let us know. Fair?</p> <p>19 A. Yes.</p> <p>20 Q. Great. Who put this document together,</p> <p>21 this ICE detainee handbook?</p> <p>22 A. It's a group of people. So the handbook</p> <p>23 has been in effect since I started back in 1995. So</p> <p>24 over the years as standards change, contracts change,</p> <p>25 the policy review committee will review this on an</p>	35	<p>1 A. Correct, the voluntary work program with</p> <p>2 the detainees.</p> <p>3 Q. So when you read this second sentence,</p> <p>4 you are understanding the organized, supervised</p> <p>5 continuous program of daily cleaning by all detainees</p> <p>6 to mean the voluntary work program; is that right?</p> <p>7 A. It's all encompassing. So you have your</p> <p>8 voluntary work program, which covers areas in laundry</p> <p>9 or kitchen, and then you have your housing unit</p> <p>10 sanitation, which we discussed earlier.</p> <p>11 Q. Okay. What else does the voluntary work</p> <p>12 program cover that is not covered by the housing unit</p> <p>13 sanitation policy?</p> <p>14 A. I don't follow your question.</p> <p>15 Q. It's because I've been trying to sort of</p> <p>16 separate these things out into topics, because I want</p> <p>17 us to be in one lane, if we can, mentally.</p> <p>18 A. Okay.</p> <p>19 Q. Because we have a topic about the</p> <p>20 voluntary work program; we have a topic about the</p> <p>21 housing sanitation policy. It seems to me that you've</p> <p>22 described it as two programs, the voluntary work</p> <p>23 program and then the obligations of the detainees. Is</p> <p>24 that a fair understanding?</p> <p>25 A. I see it as your housing unit where you</p>
34	<p>1 annual basis and make changes as needed.</p> <p>2 Q. And the policy review committee has</p> <p>3 always been GEO or its corporate predecessor; is that</p> <p>4 correct?</p> <p>5 A. Local Aurora staff, yes.</p> <p>6 Q. The local GEO folks in Aurora?</p> <p>7 A. Yes.</p> <p>8 Q. Again, I'm not asking about any GEO</p> <p>9 office anywhere else for the purpose of this next line</p> <p>10 of questions. Section V on page 55, do you see that</p> <p>11 section?</p> <p>12 A. Yes.</p> <p>13 Q. And what does that say? It says, "The</p> <p>14 center will maintain the highest sanitation standards</p> <p>15 at all times in all locations without exception.</p> <p>16 There will be an organized, supervised and continuous</p> <p>17 program of daily cleaning by all detainees to maintain</p> <p>18 those standards."</p> <p>19 A. Yes.</p> <p>20 Q. Is this part of your housing unit</p> <p>21 sanitation policy?</p> <p>22 A. To have high sanitation levels, yes.</p> <p>23 Q. And indeed, to have an organized,</p> <p>24 supervised and continuous program of daily cleaning by</p> <p>25 all detainees to maintain those standards?</p>	36	<p>1 do your housing unit sanitation, and then there is as</p> <p>2 well your voluntary work program where they put in an</p> <p>3 application and are chosen to work in other areas of</p> <p>4 the facility.</p> <p>5 Q. But sometimes the voluntary work program</p> <p>6 detainees work in the housing unit; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. If you'll turn the page to the next part</p> <p>9 of the exhibit, it's page 56. Do you see on the</p> <p>10 left-hand column where it says, "Housing Unit</p> <p>11 Sanitation"?</p> <p>12 A. Yes.</p> <p>13 Q. It says, "Each and every detainee must</p> <p>14 participate in the facility's sanitation program. A</p> <p>15 list of detainees is developed each day by staff and</p> <p>16 is posted daily for viewing. During a general cleanup</p> <p>17 all detainees must participate. The assigned housing</p> <p>18 unit officer will be responsible for assuring this</p> <p>19 general cleanup is done on a regular basis." Do you</p> <p>20 see that?</p> <p>21 A. Yes.</p> <p>22 Q. Is that the current policy of GEO?</p> <p>23 A. Yes.</p> <p>24 Q. What's a general cleanup?</p> <p>25 A. After meals they have a day room area,</p>

37

1 which is a common area, where all of the TVs and
 2 tables are located. They all eat at these tables, so
 3 after meal service, they will clean up the tables,
 4 wipe down the tables, and sweep and mop the floors.
 5 **Q. And that is -- according to this policy,**
 6 **all detainees are required to participate?**
 7 A. In that common area cleanup.
 8 **Q. So that's every meal?**
 9 A. Yes.
 10 **Q. So when it says, "this general cleanup is**
 11 **done on a regular basis," that's one of the examples.**
 12 **A meal time is one of the examples; is that right?**
 13 A. Yes.
 14 **Q. Are there any other examples of when a**
 15 **general cleanup happens?**
 16 A. No. The general cleanup that that is
 17 discussing is after the meal service.
 18 **Q. Okay. So there's never another time when**
 19 **there's a general cleanup?**
 20 A. Not in the common area, no.
 21 **Q. Okay. What about anywhere else?**
 22 A. No.
 23 **Q. All right. Every single detainee at the**
 24 **Aurora Detention Facility who is detained under the**
 25 **ICE contract is bound by this housing unit sanitation**

38

1 **policy; is that right?**
 2 A. If they're housed in a housing unit.
 3 **Q. Where else could they be housed if**
 4 **they're an ICE detainee?**
 5 A. Medical.
 6 **Q. So if you're in medical, you're not**
 7 **subject to those cleanup requirements?**
 8 A. If there's a medical condition or some
 9 type of contagious disease that they may have, then,
 10 no.
 11 **Q. Okay. How many people can be housed in**
 12 **medical at a time?**
 13 A. I believe there's 11 beds in there.
 14 **Q. Okay. What's the current bed count at**
 15 **the facility for ICE detainees?**
 16 A. Today?
 17 **Q. Yes. How many available beds do you**
 18 **have?**
 19 A. The contract is up to 525.
 20 **Q. So the maximum number of beds that you**
 21 **can supply to ICE under your contract?**
 22 A. Yes.
 23 **Q. If you could, I now would like you to**
 24 **take a look at pages 46 and 51 -- excuse me -- 46**
 25 **through 51. So you're going to go backwards and**

39

1 **you're going to rotate the notebook. Do you recognize**
 2 **the document that I've placed in front of you?**
 3 A. Yes. This is the voluntary work program
 4 out of the PBNDS.
 5 **Q. If you'll turn to page 47, do you see**
 6 **Section C where it says, "Personal Housekeeping**
 7 **Required"?**
 8 A. Yes.
 9 **Q. Take a moment and look at that and let me**
 10 **know when you're ready for me to ask you some**
 11 **questions.**
 12 A. I'm ready.
 13 **Q. Okay. Now, do you understand that the**
 14 **personal housekeeping requirement is separate from the**
 15 **voluntary work program under the PBNDS?**
 16 A. I don't follow your statement.
 17 **Q. Is it your understanding that under the**
 18 **PBNDS there is a voluntary work program that detainees**
 19 **can elect to participate in, and then there's a**
 20 **mandatory personal housekeeping requirement?**
 21 A. In their cells, yes.
 22 **Q. All right. Is it your understanding that**
 23 **that mandatory personal housekeeping requirement is**
 24 **laid out here in Section C?**
 25 A. It says immediate living area.

40

1 **Q. Okay. What does that mean to you?**
 2 A. To me that could mean in their cell or in
 3 the common area, because that common area is also
 4 considered their living area. That's where they watch
 5 television. That's where they watch movies. That's
 6 where they play Xboxes, they play board games.
 7 **Q. Is there a living area that would be left**
 8 **that would not be immediate if it extended all of the**
 9 **way into the common area?**
 10 A. No.
 11 **Q. So in order for the word "immediate," to**
 12 **mean anything, it has to mean that there's some**
 13 **delineation between your immediate living area and the**
 14 **rest, right?**
 15 A. If I understand what you're saying
 16 correctly, the whole unit is -- it's all connected.
 17 **Q. Right.**
 18 A. The doors never lock. Their cells are
 19 always unlocked. They can come and go into that
 20 common area.
 21 **Q. So I just want to understand your**
 22 **testimony. Is it The GEO Group's understanding that**
 23 **the PBNDS extends the immediate living area all of the**
 24 **way out into the common area?**
 25 A. In my opinion, yes.

41

1 **Q. Okay. Well, you're speaking on behalf of**
 2 **The GEO Group. You understand that's the testimony**
 3 **you're providing?**
 4 A. Yes.
 5 **Q. Okay. If you could turn to Tab 8. We'll**
 6 **mark this as Exhibit 3.**
 7 (Deposition Exhibit 3 was marked.)
 8 **Q. Do you recognize the document?**
 9 A. Yes.
 10 **Q. What is it?**
 11 A. It is the local site-specific sanitation
 12 policy.
 13 **Q. And is this the policy that you were**
 14 **referring to earlier when you were discussing the one**
 15 **that goes through an annual review and sets forth the**
 16 **requirements that GEO is going to hold the detainees**
 17 **responsible for? And there are multiple policies in**
 18 **there. If you want to take a second and look, that's**
 19 **fine.**
 20 A. Yes. This is the facility sanitation
 21 policy.
 22 **Q. Okay. Who develops the housekeeping**
 23 **plan?**
 24 A. That would usually be the fire safety
 25 manager who also covers sanitation issues, and then

42

1 the review committee would review it and make any
 2 additions or deletions.
 3 **Q. Okay. Is there an example of a**
 4 **housekeeping plan at the page that I've marked? It's**
 5 **like three pages in and at the bottom, it says,**
 6 **"GEO_MEN 1505."**
 7 A. Yes.
 8 **Q. This is not provided to the detainees; is**
 9 **that correct?**
 10 A. No policies are provided to the
 11 detainees.
 12 **Q. Are these policies provided to all staff?**
 13 A. Yes.
 14 **Q. Are the staff expected to ensure that the**
 15 **facility operates according to these policies?**
 16 A. Yes.
 17 **Q. And if a detainee is noncompliant with**
 18 **these policies, does that mean the detainee has**
 19 **violated the housing unit sanitation policy?**
 20 A. Not --
 21 MS. FELTON: Object to form.
 22 A. Not necessarily.
 23 **Q. (BY MR. FREE) Let's go to, just as an**
 24 **example, 1508. It looks like this. Do you recognize**
 25 **that?**

43

1 A. It looks like part of the attachment to
 2 the sanitation policy.
 3 **Q. This is for the housing unit cleaning**
 4 **schedule, right? You'll see at the top.**
 5 A. I'm looking for a year.
 6 **Q. Sure. You're in the previous exhibit.**
 7 **You want to just go back a couple of pages, I think.**
 8 A. So this one looks like it was from 2010.
 9 **Q. Okay. Is this a fair representation of**
 10 **the type of thing that would be created pursuant to**
 11 **your company's policies at Aurora?**
 12 A. Yes.
 13 **Q. Okay. And this is what the employees**
 14 **would be responsible for implementing in each housing**
 15 **unit; is that right?**
 16 A. The entire facility.
 17 **Q. Okay. The tasks described under**
 18 **"Scheduled Cleaning" are assigned to the detainees; is**
 19 **that right?**
 20 MS. FELTON: Object to form.
 21 A. Can you repeat, please.
 22 **Q. (BY MR. FREE) Sure. In the second**
 23 **column -- and I'll clarify my question. In the second**
 24 **column, it says, "Scheduled Cleaning," there are a**
 25 **number of tasks. And it actually has the frequency,**

44

1 **between every meal, once a shift, once a month. Do**
 2 **you see that?**
 3 A. Yes.
 4 **Q. To the left of it, we have an area**
 5 **listed. To the right of it, we have cleaners and**
 6 **disinfectants. Is that right?**
 7 A. Yes.
 8 **Q. Every single thing in this table is**
 9 **assigned to a detainee; is that correct?**
 10 MS. FELTON: Object to form.
 11 A. No.
 12 **Q. (BY MR. FREE) Okay. Which of these**
 13 **tasks or areas or instructions is performed by someone**
 14 **other than a detainee?**
 15 A. Light fixtures, vents, air ducts, that's
 16 usually done by maintenance.
 17 **Q. That's the bottom row?**
 18 A. That's the bottom. Furniture, there's no
 19 furniture except for the tables in the common area.
 20 **Q. Okay. Anything else?**
 21 A. Let me clarify. This policy was from the
 22 old building.
 23 **Q. Let's turn then to 1510. It's a couple**
 24 **of pages in front of you. Do you recognize this**
 25 **document?**

45	<p>1 A. Yes. This is an updated version.</p> <p>2 Q. Is this the most recent policy?</p> <p>3 A. No.</p> <p>4 Q. Okay. Do you see Section B?</p> <p>5 A. Yes.</p> <p>6 Q. And in Section B, you see it says, "Each</p> <p>7 detainee will be responsible for the cleanliness of</p> <p>8 his or her cell or living area, including walls,</p> <p>9 floors, sink, toilet, windows, and other property</p> <p>10 within the cell, room, or living area." Do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 Q. So under this policy the detainees have</p> <p>14 to clean their own living area, right?</p> <p>15 A. Yes.</p> <p>16 Q. And then there is some separate</p> <p>17 housekeeping schedule that is developed pursuant to</p> <p>18 this policy called the housekeeping plan; is that</p> <p>19 right?</p> <p>20 A. Yes.</p> <p>21 Q. And detainees -- other than the</p> <p>22 maintenance exception that you noted before and the</p> <p>23 furniture exception that you noted before, detainees</p> <p>24 are assigned those jobs; is that right?</p> <p>25 A. Yeah.</p>	47	<p>1 However, if they do become a maintenance trustee, they</p> <p>2 are always working under the supervision of one of the</p> <p>3 maintenance employees.</p> <p>4 Q. (BY MR. FREE) Okay. And it's my</p> <p>5 understanding, though, that -- strike that. This</p> <p>6 policy that I've just shown you from 2014, is this the</p> <p>7 most recent?</p> <p>8 A. No.</p> <p>9 Q. No. Okay.</p> <p>10 MR. FREE: Would you mind making that a</p> <p>11 late-filed exhibit to today's deposition? Can we do</p> <p>12 that? Because I think we're trying to keep this up to</p> <p>13 date.</p> <p>14 Q. (BY MR. FREE) Do you know if there are</p> <p>15 any substantial changes to this policy?</p> <p>16 A. I don't know off the top of my head.</p> <p>17 Q. Okay. So the detainees are responsible</p> <p>18 for cleaning the living area, including the common</p> <p>19 area, under this policy from the windows to the walls;</p> <p>20 is that right?</p> <p>21 MS. FELTON: Object to form.</p> <p>22 A. No. And let me clarify. So under B</p> <p>23 where it talks about living area, a lot of times in</p> <p>24 their individual cells what happens is they will take</p> <p>25 toothpaste and use it as a type of glue and they'll</p>
46	<p>1 MS. FELTON: Object to form.</p> <p>2 Q. (BY MR. FREE) Now, I did notice on that</p> <p>3 previous document we were looking at when it was</p> <p>4 discussing -- going back to 1508, the maintenance</p> <p>5 actually says, "Done by maintenance trustee." Do you</p> <p>6 see at the bottom right-hand corner?</p> <p>7 A. Yes.</p> <p>8 Q. Who is that?</p> <p>9 A. A lot of times there is not a maintenance</p> <p>10 trustee. That is only if somebody were to apply under</p> <p>11 the voluntary work program that met the qualifications</p> <p>12 and was approved to work in that position, then we</p> <p>13 would have a maintenance trustee.</p> <p>14 Q. If there's no person in the voluntary</p> <p>15 work program working as a maintenance trustee, who</p> <p>16 performs these tasks?</p> <p>17 A. Maintenance.</p> <p>18 Q. Those are GEO employees who are not</p> <p>19 detainees?</p> <p>20 A. Yes.</p> <p>21 Q. So sometimes GEO employees are performing</p> <p>22 these maintenance tasks, and sometimes detainees are</p> <p>23 performing these maintenance tasks; is that right?</p> <p>24 MS. FELTON: Object to form.</p> <p>25 A. If they apply, meet the qualifications.</p>	48	<p>1 put it on the wall and put pictures on the wall. That</p> <p>2 is where they're supposed to keep their walls clean.</p> <p>3 They're not in the common area where the TVs are</p> <p>4 scrubbing walls. That's in their individual cells.</p> <p>5 The floors, that's in their cell, that's in the common</p> <p>6 area, but not in the day area. And there's no windows</p> <p>7 with the exception of -- because it's all skylights up</p> <p>8 there, so the basic windows are the ones when they go</p> <p>9 up and they're waiting and they put all of their</p> <p>10 handprints on it. So they'll just wipe the window</p> <p>11 down with a window cleaner.</p> <p>12 Q. (BY MR. FREE) So is that part of the</p> <p>13 housing unit sanitation policy that requires detainees</p> <p>14 to do this work?</p> <p>15 MS. FELTON: Object to form.</p> <p>16 A. Usually it's the one under the voluntary</p> <p>17 work program.</p> <p>18 Q. (BY MR. FREE) What determines whether</p> <p>19 it's going to be a voluntary work program detainee or</p> <p>20 a detainee within the unit who does that work, who</p> <p>21 does the windows?</p> <p>22 A. A detainee can decide whether or not they</p> <p>23 want to apply for a job. So they fill out an</p> <p>24 application. The ones that clean up after the meal</p> <p>25 service, those are those little sheets where they</p>

49

1 assign about three people to clean up after a meal
 2 service.
 3 **Q. Those are required cleanups for everyone**
 4 **if I understand your testimony earlier?**
 5 A. Correct.
 6 MS. FELTON: Object to form.
 7 A. Yes.
 8 **Q. (BY MR. FREE) All right. I read**
 9 **somewhere there are between 3 and 4,000 people who**
 10 **come through the Aurora Detention Facility a year as**
 11 **ICE detainees. Does that sound right to you?**
 12 A. Yes.
 13 **Q. Over the course of the past ten years,**
 14 **there have even been higher populations of ICE**
 15 **detainees. Is that your understanding?**
 16 A. Yes.
 17 **Q. In terms of sheer numbers of people who**
 18 **were detained at the Aurora Detention Facility, we're**
 19 **looking somewhere in the neighborhood of 40 to 60,000**
 20 **people who have been subject to these sanitation**
 21 **policies. Is that your understanding?**
 22 MS. FELTON: Object to form.
 23 A. Yes.
 24 **Q. (BY MR. FREE) Okay. And if you had to**
 25 **estimate the number of detainees in the last ten years**

50

1 **who have been through the Aurora Detention Facility,**
 2 **what would the number be?**
 3 A. In the last ten years?
 4 **Q. Yes, ma'am.**
 5 A. Maybe 50 to 60,000.
 6 **Q. Okay. Probably not less than 40?**
 7 A. Correct.
 8 **Q. We're going to be stretching it if we say**
 9 **it's more than 60; is that right?**
 10 A. It depends, because years ago we were
 11 doing sometimes 7,000 a year --
 12 **Q. Okay.**
 13 A. -- in and out.
 14 **Q. All of these people have been subject to**
 15 **this policy, is that right, to the --**
 16 MS. FELTON: Object to form.
 17 MR. FREE: Excuse me.
 18 **Q. (BY MR. FREE) -- to the housing unit**
 19 **sanitation policy?**
 20 A. Yes.
 21 **Q. Okay. In whatever form it was in when**
 22 **they were there is, I guess, my addendum to that**
 23 **question.**
 24 A. Yes.
 25 **Q. Great. What happens if a detainee does**

51

1 **not comply with the housing unit sanitation policy?**
 2 A. I don't follow.
 3 **Q. If a detainee refuses to comply or fails**
 4 **to comply with the housing unit sanitation policy,**
 5 **what happens?**
 6 A. Well, they -- you're talking about
 7 regular general sanitation?
 8 **Q. I don't know what that means. Tell me**
 9 **how you understand my question.**
 10 A. Like in their cell, in the cleaning up
 11 after the meal service?
 12 **Q. I'm talking about whatever this policy is**
 13 **that we've just discussed that is explained to the**
 14 **detainees when they come in and is part of their ICE**
 15 **detainee handbook and part of their local GEO**
 16 **supplement and it's on the PowerPoint, which I**
 17 **understand to mean you have some cleaning duties both**
 18 **in your living area and also for the purpose of**
 19 **regular cleanups.**
 20 A. The common areas.
 21 **Q. The common areas. That's what I**
 22 **understand the housing unit sanitation policy to mean**
 23 **in keeping with all of your testimony so far. Okay.**
 24 **So my question is: If a detainee doesn't comply with**
 25 **that policy, what happens?**

52

1 A. They can be charged with a 300-level
 2 offense.
 3 **Q. What is a 300-level offense?**
 4 A. For refusing to clean their assigned
 5 living area, I believe it's 306.
 6 **Q. And the fact you've said it's a 300-level**
 7 **offense indicates to me there's multiple levels; is**
 8 **that right?**
 9 A. Yes.
 10 **Q. On what level is the 300 level?**
 11 A. Second to the lowest.
 12 **Q. Okay. What are the potential penalties**
 13 **for failing to comply with policies and then getting**
 14 **charged with a 300-level offense?**
 15 MS. FELTON: Object to form.
 16 A. I would have to look at the handbook to
 17 see the specifics, but I believe we could take away
 18 their commissary ordering, they could do up to 72
 19 hours in disciplinary seg. I would have to look to be
 20 specific, though, on any other items.
 21 **Q. (BY MR. FREE) And by "disciplinary seg,"**
 22 **you mean disciplinary segregation?**
 23 A. Disciplinary segregation.
 24 **Q. That's a separate part of the facility?**
 25 A. It's a separate housing unit.

53

1 **Q. And explain to me what that is. How do**
 2 **you get there? What's the purpose of it?**
 3 MS. FELTON: Object to form.
 4 **Q. (BY MR. FREE) Compound. Let's just**
 5 **explain to me what the disciplinary segregation unit**
 6 **is.**
 7 A. So if a detainee is charged with an
 8 offense, they will -- depending on the offense, they
 9 could go to disciplinary segregation. However, if
 10 they haven't had their hearing, they will be on the
 11 administrative segregation side, so they will still be
 12 afforded all of the opportunities, such as TV and
 13 recreation and everything else, until their hearing is
 14 done. Once the hearing is done, depending on which
 15 level of offense, after their hearing if they are
 16 found guilty and disciplinary segregation time is
 17 warranted, they will be moved to the other side so
 18 they can't see the television.
 19 **Q. How does disciplinary segregation differ**
 20 **from the living unit that the detainee is normally**
 21 **detained within?**
 22 A. There's not a lot of difference. And let
 23 me explain why. Because in our segregation unit,
 24 they're still afforded television and they are also
 25 afforded social time. They still get recreation.

54

1 They still get all of the regular amenities that
 2 general population gets. It's just more of a
 3 restricted movement.
 4 **Q. How is movement restricted within**
 5 **disciplinary segregation?**
 6 A. So they don't get as much time out of
 7 their cell as you would in general population. So
 8 social time for somebody that is in administrative
 9 segregation can be up to two hours a day where they
 10 can come out of their cell and socialize with other
 11 detainees that are in administrative segregation in
 12 the segregation unit.
 13 **Q. What about for disciplinary segregation?**
 14 **How much social time is there there?**
 15 A. No social time for disciplinary
 16 segregation.
 17 **Q. Unlike the situation you described**
 18 **earlier in the general pop housing units, in both**
 19 **administrative segregation and disciplinary**
 20 **segregation, the doors are closed, right?**
 21 MS. FELTON: Object to form.
 22 A. Yes.
 23 **Q. (BY MR. FREE) Is there anybody else in**
 24 **the detainee's cell with him or her when he or she is**
 25 **in administrative segregation?**

55

1 A. They are all single cell units.
 2 **Q. What about in disciplinary segregation?**
 3 **Is anybody else in the cell with a person who is**
 4 **detained in disciplinary segregation?**
 5 A. No. It's one unit. So one side is
 6 disciplinary, one is administrative.
 7 **Q. What's the purpose of administrative**
 8 **segregation?**
 9 A. That can vary also. So there's
 10 protective custody. A detainee can request to be
 11 placed on protective custody. We could say, hey, you
 12 need to be put on protective custody, based on threats
 13 that are being made, for that person's safety. ICE
 14 can request somebody be placed in administrative seg
 15 for protective custody purposes. A lot of people just
 16 like to go back there for the peace and quiet. We
 17 only average about four people back there, so it's
 18 very quiet. They get to watch TV. Some people really
 19 enjoy it back there.
 20 **Q. I don't understand. You just told me**
 21 **that a lot of people like to go to administrative**
 22 **segregation for the peace and quiet. And I think I**
 23 **understood you to testify that there are only four**
 24 **people back there during a given day?**
 25 A. On average.

56

1 **Q. You have 500 beds that at some point are**
 2 **in some level of being filled; is that right?**
 3 A. 525.
 4 **Q. So if it's so popular, why doesn't**
 5 **everybody go back there during the day?**
 6 A. Some of them do for short periods of
 7 time.
 8 **Q. Like how long?**
 9 A. It depends. Some go back there for a
 10 week. Some go back there for a few days. Some just
 11 say they can't handle general population living.
 12 **Q. They go to administrative segregation,**
 13 **not disciplinary segregation?**
 14 A. Correct. Only -- and I'm only discussing
 15 administrative segregation.
 16 **Q. Let's talk about disciplinary**
 17 **segregation. Same explanation that you gave for**
 18 **administrative segregation as far as the purpose, or**
 19 **does it have a different purpose?**
 20 A. As I stated earlier, if you get charged
 21 with a violation, depending on the level, usually 100
 22 and 200 levels, you're automatically going to be taken
 23 back there and be put on the administrative
 24 segregation side pending your hearing.
 25 **Q. I don't know that that answers my**

57

1 **question. I'm asking about what the purpose of**
 2 **disciplinary segregation is. Do you understand that**
 3 **question?**
 4 A. Yes.
 5 **Q. Okay. What's the purpose of disciplinary**
 6 **segregation?**
 7 A. So disciplinary segregation, if they're
 8 found guilty of a rule violation after a hearing,
 9 that's where they will be housed as like a punitive
 10 measure based on their behavior. If they get into a
 11 fight, which is a high-level offense, especially if
 12 there's injuries, they're going to spend time in
 13 disciplinary segregation based off of what the hearing
 14 officer says.
 15 **Q. And according to the disciplinary policy,**
 16 **if you are charged with a 300-level offense, for**
 17 **instance, not cleaning your area and complying with**
 18 **the housing unit sanitation policy, one of the things**
 19 **that you can suffer is up to 72 hours in segregation;**
 20 **is that right?**
 21 MS. FELTON: Object to form.
 22 A. They could go back there to the
 23 administrative segregation side based on their
 24 hearing. So what happens a lot of times is if
 25 somebody goes back there on a 300-level offense, they

58

1 would go back there. And I'm not just saying on the
 2 306 or anything, but on any 300 or 400-level offense,
 3 if they go back there, by the time their hearing is
 4 done, they get time served and they get moved out.
 5 Usually the turnaround is about two days.
 6 **Q. (BY MR. FREE) So the hearing is such**
 7 **that they don't even have time to contest their time**
 8 **in administrative segregation because it's not**
 9 **happening immediately; is that right?**
 10 MS. FELTON: Object to form.
 11 A. That's the way the PBNDS is written. We
 12 have so many hours to do the investigation and get the
 13 UDC done.
 14 **Q. (BY MR. FREE) How many hours do you**
 15 **have?**
 16 A. 24 hours and then another 24 hours to get
 17 the UDC done. The UDC is done for all four levels,
 18 but the IDP is done for 100 and 200 levels.
 19 **Q. Just so we're clear when we're reading**
 20 **the transcript, can you tell us what an IDP and a UDC**
 21 **are, please.**
 22 A. So the UDC is the Unit Disciplinary
 23 Committee. That's for low-level offenses. And the
 24 IDP is the Interdisciplinary Panel for the high-level
 25 offenses.

59

1 **Q. This TV time that folks in administrative**
 2 **segregation have, are they watching it in a common**
 3 **area, or are they watching it from within their cell?**
 4 A. So social time, they come out of their
 5 cell and there's tables in front of the TV, so they
 6 can all come and sit in front of the TV together.
 7 However, the way that the TVs are situated on the
 8 administrative segregation side, they can see the TV
 9 all of the time even while they're in their cell and
 10 listen to it, because we provide them with headphones
 11 so they can watch television and hear it.
 12 **Q. So they have TV time all of the time?**
 13 A. Yes.
 14 **Q. And the social time is when they're out**
 15 **in a common area?**
 16 A. Yes.
 17 **Q. They are by themselves in these cells?**
 18 A. Yes. They are all single cells.
 19 **Q. Okay. What is the process for**
 20 **documenting the placement of a detainee into**
 21 **administrative segregation for a violation of the**
 22 **disciplinary policy?**
 23 A. So a charge packet is completed once a
 24 violation has allegedly occurred. The lieutenant
 25 signs off on it. There's also an order placing them

60

1 into administrative segregation and they will check
 2 off pending investigation for rule violation. They
 3 have to be seen by medical before they are housed in
 4 there to ensure that there's no medical issues that
 5 they can't be placed in there. Then they are placed
 6 on the administrative segregation side. We start an
 7 activity log that will document all of their
 8 activities, and then they are checked randomly every
 9 30 minutes to ensure their safety.
 10 **Q. What type of systems of records do you**
 11 **use to create these documents? For instance, the**
 12 **activity log, where is that kept?**
 13 A. It is kept in that unit. So anytime
 14 somebody is housed in there, they have an individual
 15 file. So you can open up that file, you can see why
 16 they are in there, if they're eating, medical is
 17 coming back ensuring they're getting their medication.
 18 **Q. What about all of the charging documents?**
 19 **What sort of systems of records are those charging**
 20 **documents kept in?**
 21 A. A copy is also kept in that individual
 22 file. The original will make its way to the person
 23 doing the investigation and then to the lieutenant who
 24 will conduct the hearing.
 25 **Q. How much of this is computerized?**

61	<p>1 A. They're all handwritten documents.</p> <p>2 Q. Are there ever any aggregate reports for</p> <p>3 any period of time, whether it be a day, a week, a</p> <p>4 month, a quarter, or a year, listing the number of</p> <p>5 people who have been charged under each disciplinary</p> <p>6 offense?</p> <p>7 MS. FELTON: Object to form.</p> <p>8 A. Can you clarify your question?</p> <p>9 Q. (BY MR. FREE) Yes. If I wanted to know</p> <p>10 how many people have been charged under the 300-level</p> <p>11 offense for not cleaning up your living area, is there</p> <p>12 any periodic report that a GEO official would have</p> <p>13 filled out that would tell me that?</p> <p>14 MS. FELTON: Object to form.</p> <p>15 A. I'm still not sure I follow exactly what</p> <p>16 you're saying.</p> <p>17 Q. (BY MR. FREE) Okay. Let me try it</p> <p>18 again.</p> <p>19 A. Okay.</p> <p>20 Q. During a given year, how many</p> <p>21 disciplinary charges would you say are lodged against</p> <p>22 detainees at the Aurora facility?</p> <p>23 A. So ACA, American Correctional</p> <p>24 Association, requires us to keep outcome measures and</p> <p>25 those numbers you could find every month.</p>	63	<p>1 A. The policy doesn't specify whether it has</p> <p>2 to be sent to me via e-mail.</p> <p>3 Q. In your experience, what's determined</p> <p>4 whether you get it by e-mail or not?</p> <p>5 A. It just depends on the person.</p> <p>6 Q. Okay. Have you ever considered, in the</p> <p>7 policy review committee, systematizing it so there's</p> <p>8 not so much variance person to person?</p> <p>9 A. There's been a lot of things that have</p> <p>10 been looked at, but that's not for me to decide. I --</p> <p>11 go ahead.</p> <p>12 Q. No. I want to let you finish your</p> <p>13 answer.</p> <p>14 A. No. That's okay. Go ahead.</p> <p>15 Q. I'm just wondering if that's one of those</p> <p>16 things that have been looked at, is systematizing the</p> <p>17 reporting of disciplinary charges.</p> <p>18 MS. FELTON: Object to form.</p> <p>19 A. That's a company decision that I have no</p> <p>20 control over.</p> <p>21 Q. (BY MR. FREE) I'm not asking you to make</p> <p>22 a decision for the company. All I'm asking you is to</p> <p>23 tell me on behalf of the company whether the reporting</p> <p>24 of disciplinary charges to you or to Brad -- Brad was</p> <p>25 his name -- whether that has ever been something that</p>
62	<p>1 Q. Where?</p> <p>2 A. At the facility with our compliance</p> <p>3 person.</p> <p>4 Q. In what format are those records kept?</p> <p>5 A. Computerized. I believe he keeps them</p> <p>6 all computerized.</p> <p>7 Q. Who is that person?</p> <p>8 A. Brad Stelter.</p> <p>9 Q. And did you used to have his job?</p> <p>10 A. Yes.</p> <p>11 Q. Who else looks at the numbers of</p> <p>12 disciplinary actions that are kept for the purposes of</p> <p>13 ACA compliance?</p> <p>14 A. I guess that varies. I'll take a look at</p> <p>15 them. However, I get the e-mails anytime that there</p> <p>16 is a charge that has been done, so I know what's going</p> <p>17 on.</p> <p>18 Q. Anytime there's an e-mail -- excuse me.</p> <p>19 Anytime there's a charge, you receive an e-mail?</p> <p>20 A. Not all of the time.</p> <p>21 Q. What determines whether you get an e-mail</p> <p>22 or not?</p> <p>23 A. If the lieutenant sends it. Sometimes</p> <p>24 I'll get just a hard copy in my mailbox.</p> <p>25 Q. What's the policy say?</p>	64	<p>1 you've considered formalizing and systematizing into a</p> <p>2 policy so that it's not ad hoc and person by person as</p> <p>3 you've described?</p> <p>4 A. So Brad doesn't get all of those. He</p> <p>5 will get the final numbers for the outcome measures.</p> <p>6 Outcome measures only deal with the numbers. You can</p> <p>7 keep them. However, anything that has been removed</p> <p>8 from their file, we don't count.</p> <p>9 Q. Okay. Who keeps the numbers?</p> <p>10 A. Usually that would be classification.</p> <p>11 Q. So a GEO employee or employees in the</p> <p>12 classification department would be responsible for</p> <p>13 getting these numbers of disciplinary actions or</p> <p>14 charges and giving them to Brad?</p> <p>15 A. Or giving them to the chief of security</p> <p>16 who will in turn give them to Brad.</p> <p>17 Q. Is there a written policy on how this</p> <p>18 works?</p> <p>19 A. No.</p> <p>20 Q. How did you train people, when you were</p> <p>21 responsible for training, on how to report to your</p> <p>22 accreditation people the number of disciplinary things</p> <p>23 that had happened?</p> <p>24 A. At the time ACA didn't require outcome</p> <p>25 measures.</p>

65

1 **Q. Do you recall when they started requiring**
 2 **it?**
 3 A. Probably within the last six years or so.
 4 **Q. Okay. You, The GEO Group, do have the**
 5 **outcome measures information that were provided to**
 6 **ACA; is that right?**
 7 A. Yes. Those are provided every three
 8 years, and then ICE also receives a second copy.
 9 **Q. How often does ICE receive that copy?**
 10 A. Only during the audit when they come in
 11 and audit the facility, which is annually.
 12 **Q. Who performs the audit?**
 13 A. A contractor through ICE.
 14 **Q. Is that the Nakamoto Group?**
 15 A. Currently, yes.
 16 **Q. Does the Office of Detention Oversight**
 17 **ever perform a separate audit?**
 18 A. Yes.
 19 **Q. How often do those audits happen?**
 20 A. I've seen it maybe once every three years
 21 or so.
 22 **Q. Okay. During these audits, are these**
 23 **metrics being provided to the auditors?**
 24 A. Yes.
 25 **Q. Are the disciplinary charges that you're**

66

1 **keeping track of when you're measuring outcomes broken**
 2 **down by the infraction?**
 3 MS. FELTON: Object to form.
 4 A. I would have to look at the sheet. Those
 5 outcome measures, they do change, and there's two
 6 different sets.
 7 **Q. (BY MR. FREE) What do you mean?**
 8 A. There's the ACA set and then there's the
 9 ICE set.
 10 **Q. Why are there two different sets?**
 11 A. They just each require their own.
 12 **Q. How do they differ?**
 13 A. Some of the questions that they ask. It
 14 just depends. I know it had recently changed within
 15 the last year again.
 16 **Q. So to go back to the original question**
 17 **that started us down this line --**
 18 A. Uh-huh.
 19 **Q. -- if I wanted to know how many people**
 20 **have been charged with a 300-level offense of refusing**
 21 **to clean pursuant to the housing unit sanitation**
 22 **policy, could I look at those metrics?**
 23 MS. FELTON: Object to form.
 24 A. You could see the outcome measures, but I
 25 don't know if it breaks it down into specific like for

67

1 a 301 or a 302 or if it's just for low-level offenses
 2 compared to high-level offenses.
 3 **Q. (BY MR. FREE) Do you have any way of**
 4 **knowing how many people have been placed into**
 5 **administrative segregation for refusal to clean their**
 6 **Pods?**
 7 MS. FELTON: Object to form.
 8 A. We would have to go back and look at each
 9 individual detention file.
 10 **Q. (BY MR. FREE) Could you also look at**
 11 **e-mails you've received?**
 12 A. E-mails aren't necessarily reliable,
 13 because sometimes we don't get one every single time
 14 somebody is put into administrative seg.
 15 **Q. So conceding that it could be under**
 16 **representative, it could also provide you a source of**
 17 **information about how many people have been placed**
 18 **into administrative segregation for not cleaning their**
 19 **Pods; is that right?**
 20 MS. FELTON: Object to form.
 21 A. I don't understand your question.
 22 **Q. (BY MR. FREE) Even if you don't get an**
 23 **e-mail every time, is it conceivable that a detainee**
 24 **who refused to clean his pod, was placed into**
 25 **administrative segregation, and then had documents**

68

1 **created, those documents were e-mailed to you?**
 2 MS. FELTON: Object to form.
 3 A. I'm sorry. I still don't understand.
 4 **Q. (BY MR. FREE) I think you told me**
 5 **earlier some lieutenants send you an e-mail with the**
 6 **paperwork, some don't; is that right?**
 7 A. Correct.
 8 **Q. Presumably if a person were charged with**
 9 **a 300-level violation for not cleaning their pod, then**
 10 **the documents would reflect that, the charging**
 11 **documents, right?**
 12 A. Yes.
 13 **Q. And sometimes you get the charging**
 14 **documents by e-mail, right?**
 15 A. Yes. And if I don't, then I get them in
 16 my mailbox as a hard copy.
 17 **Q. So at least some cases you could look at**
 18 **your e-mails and find out if a person was charged with**
 19 **a 300-level offense for not cleaning their pod?**
 20 MS. FELTON: Object to form.
 21 A. I could check my e-mail, but I couldn't
 22 go back more than three or four years because we got a
 23 new system and all of our old e-mails were wiped out,
 24 at least if I wanted to check it.
 25 **Q. (BY MR. FREE) Does anybody else get an**

69

1 e-mail that is similar to the one that you get from
 2 the lieutenant reporting a disciplinary charge?
 3 A. The chief of security usually gets those,
 4 the warden.
 5 Q. How do you determine whether employees
 6 are correctly following the housing unit sanitation
 7 policy if you can't tell when people are put into
 8 administrative segregation for violating it?
 9 MS. FELTON: Object to form.
 10 A. I know who is in segregation.
 11 Q. (BY MR. FREE) Okay.
 12 A. I'm back there -- when I'm not traveling,
 13 I'm back there. The chief of security is back there.
 14 I see the reports. I'm a firm believer in management
 15 by walking around. So when I make my rounds, I'm
 16 looking at sanitation issues. It doesn't matter if
 17 I'm in the hallway or whatever, you know, wherever I
 18 go, I'm making sure, so I know what's going on in my
 19 facility. I think, if memory serves me correct, I've
 20 seen maybe one that ever complained about being put
 21 into seg for a cleaning issue. Other than that,
 22 nobody has that I can recall.
 23 Q. Do you recall when you saw that one
 24 person who complained?
 25 A. It's been a long time. I would say

70

1 maybe -- I don't know -- four years. I don't know off
 2 the top of my head.
 3 Q. You were the assistant warden of
 4 operations at the time?
 5 A. Yes.
 6 Q. What do you recall about the complaint?
 7 A. I just recall that somebody was put in
 8 there, but I don't recall the specifics without
 9 actually seeing the report.
 10 Q. Where would you go to look for that
 11 report?
 12 A. I could go through detention files or I
 13 could look at a grievance. Maybe it was a grievance
 14 that I had received, because I was the grievance
 15 coordinator for a while.
 16 Q. What period were you serving in that
 17 function?
 18 A. 2010 through '13 or '14.
 19 Q. Okay. So for you to analyze at a
 20 corporate level here in Aurora whether someone was put
 21 into segregation for violating the housing unit
 22 sanitation policy, would that person have to file a
 23 grievance for it to come to your attention?
 24 A. No.
 25 MS. FELTON: Object to form.

71

1 A. No.
 2 Q. (BY MR. FREE) How else would you learn
 3 about that?
 4 A. From my rounds. A lot of times detainees
 5 will informally come and talk to you. They can fill
 6 out a detainee request form, otherwise known as a
 7 kite, but a lot of times you can just resolve issues
 8 by walking around.
 9 Q. Would that be in the administrative
 10 segregation unit?
 11 A. In any unit.
 12 Q. Do you recall whether there were other
 13 times when the detainee wasn't grieving through the
 14 formal grievance process or even submitting a kite,
 15 but the detainee was in administrative segregation for
 16 not cleaning up?
 17 MS. FELTON: Object to form.
 18 A. No.
 19 Q. (BY MR. FREE) No. Ms. Ceja, are you
 20 doing okay? Do you need a break?
 21 A. No. I'm fine. Thank you.
 22 MR. TURNER: How about the court
 23 reporter?
 24 THE COURT REPORTER: I'm good. Thank
 25 you.

72

1 MR. FREE: Are you sure?
 2 THE COURT REPORTER: Yes, I'm good.
 3 MR. FREE: Let us know. Ms. Felton?
 4 MS. FELTON: I don't matter.
 5 MR. FREE: You matter more than you know.
 6 MR. TURNER: She's not even under oath
 7 and she's telling the truth.
 8 MR. FREE: All right. I'm going to take
 9 a break. Okay. We'll go off the record for a moment.
 10 (Recess taken, 10:59 a.m. to 11:20 a.m.,
 11 after which time Mr. Turner was not present.)
 12 MR. FREE: We are back on the record at
 13 11:18 a.m. Thank you very much for giving me a little
 14 bit more time.
 15 Q. (BY MR. FREE) When we broke last, we
 16 were talking a little bit about administrative
 17 segregation and disciplinary segregation. First of
 18 all, is there anything about your testimony so far
 19 that you need to amplify or change or correct in any
 20 way?
 21 A. No.
 22 Q. Did you have any communications about
 23 your testimony with your attorney during the break?
 24 A. No.
 25 Q. Okay. Thank you.

73	<p>1 A. You're welcome.</p> <p>2 Q. So can you describe to me the physical</p> <p>3 layout of disciplinary segregation versus</p> <p>4 administrative segregation?</p> <p>5 A. Yes.</p> <p>6 Q. Thanks.</p> <p>7 A. When you walk into this unit, there's a</p> <p>8 total of 48 beds, two tiers. On the lower tier, as</p> <p>9 you walk in on the right-hand side, is the</p> <p>10 administrative segregation, and on the left side is</p> <p>11 disciplinary segregation.</p> <p>12 Q. What's in the middle?</p> <p>13 A. There's two tables, four seats at each</p> <p>14 table, an officer station to the right, two small</p> <p>15 recreation yards on the right, and then there are two</p> <p>16 televisions on the left-hand side facing</p> <p>17 administrative segregation.</p> <p>18 Q. Okay. I am a very visual learner. And I</p> <p>19 think it may be actually easier for you to just</p> <p>20 diagram it for us.</p> <p>21 A. Can I just, due to security concerns --</p> <p>22 MS. FELTON: We can't do that.</p> <p>23 MR. FREE: What do you mean?</p> <p>24 MS. FELTON: I mean that I'll object and</p> <p>25 instruct that she cannot diagram the facility for</p>	75	<p>1 facility -- if we want to go in, we can inspect it --</p> <p>2 MS. FELTON: You can go in and inspect</p> <p>3 it.</p> <p>4 MR. FREE: -- in lieu of having a</p> <p>5 diagram. So when can we do that?</p> <p>6 MS. FELTON: Well, we'll go off the</p> <p>7 record at another time and find a suitable date.</p> <p>8 MR. FREE: But we've agreed we can go to</p> <p>9 the facility and inspect?</p> <p>10 MS. FELTON: With ICE clearance, yes.</p> <p>11 Every single person that goes into that facility, I</p> <p>12 don't care who you are, every single person that walks</p> <p>13 into that facility has to be cleared by ICE first.</p> <p>14 I'm not talking a background check. I'm saying ICE</p> <p>15 has to say yes. I don't care if you're an assistant</p> <p>16 U.S. attorney.</p> <p>17 MR. FREE: So just so I understand,</p> <p>18 though, we have a stipulated protective order in this</p> <p>19 case.</p> <p>20 MS. FELTON: Yes, we do.</p> <p>21 MR. FREE: And I can pull it up. In</p> <p>22 fact, we may even have it in our binder.</p> <p>23 MS. FELTON: I'm fully aware of what the</p> <p>24 protective order says. And I'm fine with getting</p> <p>25 Judge Kane on the phone.</p>
74	<p>1 security purposes, because this deposition is going to</p> <p>2 go to people who have been in the facility or people</p> <p>3 who may go into the facility. And that is an ICE</p> <p>4 directive. They don't give out schematics of the</p> <p>5 facility. They don't allow us to diagram the facility</p> <p>6 so that detainees can't know where things are located</p> <p>7 within the facility.</p> <p>8 MR. FREE: Okay. So what is the legal</p> <p>9 basis of your objection?</p> <p>10 MS. FELTON: Security purposes.</p> <p>11 MR. FREE: That's not a privilege.</p> <p>12 MS. FELTON: No, it's not, no. And we</p> <p>13 can -- and it's not a privilege, but I'm not going to</p> <p>14 let her answer that for security purposes. I cannot</p> <p>15 have anybody diagram the facility, which is why if you</p> <p>16 want to go in and inspect the facility, we can do</p> <p>17 that, but I cannot diagram the facility and I cannot</p> <p>18 provide a schematic of the facility.</p> <p>19 MR. FREE: Great. When can we do that?</p> <p>20 MS. FELTON: You will have to get ICE</p> <p>21 clearance.</p> <p>22 MR. FREE: Well, no, you just assured</p> <p>23 us --</p> <p>24 MS. FELTON: Yes.</p> <p>25 MR. FREE: -- and you own this</p>	76	<p>1 MR. FREE: I wasn't finished. Let me</p> <p>2 just finish. I can pull it up. I think we may have</p> <p>3 printed it out. If not, I can print it out. My</p> <p>4 understanding is we have limitations on the use of</p> <p>5 this discovery and we have tiers that would prevent</p> <p>6 any of your concerns from being realized. You've</p> <p>7 marked everything in your paper discovery as</p> <p>8 confidential.</p> <p>9 MS. FELTON: Correct.</p> <p>10 MR. FREE: We haven't objected.</p> <p>11 MS. FELTON: No. And there is no</p> <p>12 provision in the protective order that prevents your</p> <p>13 clients from seeing the documents in this case.</p> <p>14 MR. FREE: Okay. How is the jury</p> <p>15 supposed to see what segregation looks like?</p> <p>16 MS. FELTON: It doesn't matter what</p> <p>17 segregation looks like. That's not an issue in this</p> <p>18 case.</p> <p>19 MR. FREE: So just to understand, you're</p> <p>20 instructing your witness not to answer; is that right?</p> <p>21 MS. FELTON: Yes.</p> <p>22 MR. FREE: Okay. You're not claiming any</p> <p>23 privilege?</p> <p>24 MS. FELTON: No.</p> <p>25 MR. FREE: Okay. Thank you.</p>

77	<p>1 Q. (BY MR. FREE) The tier is --</p> <p>2 MR. FREE: And by answer, I just want to</p> <p>3 clarify, you're instructing your witness not to</p> <p>4 diagram?</p> <p>5 MS. FELTON: Diagram.</p> <p>6 Q. (BY MR. FREE) And it's just one tier of</p> <p>7 a segregation unit, is my understanding, based on your</p> <p>8 testimony so far?</p> <p>9 A. Correct. ICE does not utilize -- we do</p> <p>10 not house ICE detainees on the second tier, just on</p> <p>11 the lower tier.</p> <p>12 Q. So it's just the lower floor of one tier?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. You said there are TVs on one</p> <p>15 side, right?</p> <p>16 A. The TVs face the administrative</p> <p>17 segregation side.</p> <p>18 Q. Okay. They don't face the disciplinary</p> <p>19 segregation side?</p> <p>20 A. Correct.</p> <p>21 Q. And you said in administrative</p> <p>22 segregation, you get two hours of social time?</p> <p>23 A. Yes.</p> <p>24 Q. Where are you when you're not doing</p> <p>25 social time?</p>	79	<p>1 MS. FELTON: Object to form.</p> <p>2 A. They're not physically restrained inside</p> <p>3 the cell, but the door is closed, yes.</p> <p>4 Q. (BY MR. FREE) The door physically</p> <p>5 prevents them from going out of the cell like they</p> <p>6 would in their pod; is that right?</p> <p>7 A. Correct.</p> <p>8 Q. And is that part of the explanation that</p> <p>9 you're giving to detainees about the consequences of</p> <p>10 violating the disciplinary rules?</p> <p>11 MS. FELTON: Object to form.</p> <p>12 A. I don't understand.</p> <p>13 Q. (BY MR. FREE) Do the detainees know what</p> <p>14 administrative segregation is or seg, whatever you're</p> <p>15 calling it, solitary, is this something that is</p> <p>16 explained to a detainee when he or she enters the</p> <p>17 facility?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. It's fair to say that when looking</p> <p>20 at all of these policies, including the housing unit</p> <p>21 sanitation policy, the detainee is on notice that if</p> <p>22 he or she doesn't comply, he or she could be taken to</p> <p>23 administrative segregation; is that right?</p> <p>24 A. Correct. And that's clearly set forth in</p> <p>25 the detainee handbook.</p>
78	<p>1 A. In the cell or outside in recreation.</p> <p>2 They still get recreation time.</p> <p>3 Q. How much time of recreation do you get?</p> <p>4 A. Up to two hours.</p> <p>5 Q. Is that overlapping with social time, or</p> <p>6 is that separate from it?</p> <p>7 A. Separate.</p> <p>8 Q. Out of a 24-hour day, you're talking</p> <p>9 about 20 hours in the cell; is that right?</p> <p>10 A. Correct.</p> <p>11 Q. And you're physically restrained in the</p> <p>12 cell?</p> <p>13 MS. FELTON: Object to form.</p> <p>14 Q. (BY MR. FREE) Let me rephrase. Is the</p> <p>15 door shut?</p> <p>16 A. Yes.</p> <p>17 Q. Is the cell door locked?</p> <p>18 A. Yes.</p> <p>19 Q. You're physically not able to get out of</p> <p>20 the cell for that 20 hours?</p> <p>21 A. Correct.</p> <p>22 Q. Do the detainees understand you're going</p> <p>23 to be physically restrained in the cell when you go to</p> <p>24 administrative segregation? Is that something that's</p> <p>25 explained to them?</p>	80	<p>1 Q. Nobody is springing this on them at the</p> <p>2 last minute as a surprise?</p> <p>3 A. Correct.</p> <p>4 MS. FELTON: Object to form.</p> <p>5 Q. (BY MR. FREE) And they know they're</p> <p>6 going to be limited in their movement in</p> <p>7 administrative segregation?</p> <p>8 A. Yes.</p> <p>9 MS. FELTON: Object to form.</p> <p>10 A. Yes.</p> <p>11 Q. (BY MR. FREE) Okay. At least that is</p> <p>12 the information that you're providing to detainees so</p> <p>13 they can comply with the policies; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. By that, I mean, that their</p> <p>16 movement is going to be limited and they're going to</p> <p>17 be limited in their amount of social time, rec time;</p> <p>18 is that right?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Now, the detainee handbook puts</p> <p>21 detainees on notice that they could actually be put in</p> <p>22 disciplinary segregation for up to 72 hours if they</p> <p>23 violate the requirement that they clean up; is that</p> <p>24 right?</p> <p>25 A. Yes.</p>

81

1 **Q. Now, if a person violates the requirement**
 2 **to comply with the housing unit sanitation policy,**
 3 **does it put anyone in danger?**
 4 MS. FELTON: Object to form.
 5 A. I don't understand what you're asking.
 6 **Q. (BY MR. FREE) Is the life or safety or**
 7 **health of anyone jeopardized when someone refuses to**
 8 **comply with the housing unit sanitation policy?**
 9 MS. FELTON: Object to form.
 10 A. No, not necessarily.
 11 **Q. (BY MR. FREE) Does failure to clean up**
 12 **ever pose a serious threat to the life, health,**
 13 **safety, or property of people in their pod or to the**
 14 **staff, to other detainees?**
 15 A. Yes.
 16 MS. FELTON: Object to form.
 17 **Q. (BY MR. FREE) When?**
 18 A. For example, if you don't clean up after
 19 meal service or if you order a lot of commissary and
 20 it's kept in a cell and they don't clean up their cell
 21 and you get food on the floor, you can get bugs. It
 22 becomes a health issue. It becomes a serious
 23 sanitation issue.
 24 **Q. Okay. But does that pose a serious**
 25 **threat to the lives of other people in the cell?**

82

1 MS. FELTON: Object to form.
 2 A. Not necessarily, but in some cases, there
 3 are people who do not know how to clean up after
 4 themselves.
 5 **Q. (BY MR. FREE) As far as GEO is**
 6 **concerned, does it matter, when you're looking at a**
 7 **disciplinary action, whether it poses a health or like**
 8 **a life safety issue?**
 9 MS. FELTON: Object to form.
 10 A. I don't understand.
 11 **Q. (BY MR. FREE) Circle back to that.**
 12 **Fair?**
 13 A. Okay.
 14 **Q. I'm going to hand you what we'll mark as**
 15 **Exhibit 4 to today's deposition.**
 16 **(Deposition Exhibit 4 was marked.)**
 17 **Q. I apologize that it is not already in**
 18 **your binder. I'm going to hand it to your counsel and**
 19 **to you. If you would just plug it in, or I can do it,**
 20 **behind Tab No. 17. Have you had a chance to look at**
 21 **the document that I just handed you that we marked as**
 22 **Exhibit 4? And in the bottom right-hand corner, it**
 23 **says, "PL 59, PL 60, PL 61." Have you had a chance to**
 24 **look at that?**
 25 A. Yes.

83

1 (At this time Mr. Turner entered the
 2 room.)
 3 **Q. Do you recognize this document?**
 4 A. Yes.
 5 **Q. Or these documents?**
 6 A. Yes.
 7 **Q. What are they? Let's start with the**
 8 **first page.**
 9 A. They are all different versions of the
 10 cleanup list over the years that has been used to
 11 specify who is going to clean up after meal service.
 12 **Q. Who created these documents?**
 13 A. I do not know who created any of these
 14 versions.
 15 **Q. Okay. How often are they distributed to**
 16 **detainees?**
 17 A. Usually --
 18 MS. FELTON: Object to form.
 19 A. They're not distributed to detainees, but
 20 usually what happens is the assigned officer on the
 21 graveyard shift will fill out the names and the person
 22 who will be responsible for the following day's meals,
 23 so when dayshift comes on, it will be ready to go.
 24 **Q. (BY MR. FREE) Okay. And then where is**
 25 **this posted, if it's posted?**

84

1 A. Usually it's posted right by the detainee
 2 mailboxes. They fold it and hang it over the edge.
 3 **Q. As far as you know, is this the way that**
 4 **the detainees find out that they're responsible for**
 5 **cleaning up after meals pursuant to the housing unit**
 6 **sanitation policy?**
 7 A. Yes.
 8 **Q. Okay. This falls -- I just want to make**
 9 **sure I understand. This falls outside of the realm of**
 10 **the voluntary work program; is that right?**
 11 A. This is for all of the common area, yes.
 12 **Q. This is within the housing unit**
 13 **sanitation policy and not the voluntary work program?**
 14 A. It's part of the living area.
 15 **Q. How does that answer my question?**
 16 A. What I referred to before, when we had
 17 the same discussion, that the common area is part of
 18 the living area. It's all connected.
 19 **Q. Let's try this a different way. Do**
 20 **people get paid for doing these jobs?**
 21 A. No.
 22 **Q. Are they required to do these jobs?**
 23 A. To keep the area clean, we assign them,
 24 yes.
 25 **Q. The answer is, yes, they're required to**

85	<p>1 do these jobs?</p> <p>2 A. Yes.</p> <p>3 Q. If they don't do these jobs, they can</p> <p>4 potentially be charged with a disciplinary infraction,</p> <p>5 a 300-level infraction?</p> <p>6 A. Possibly, yes.</p> <p>7 Q. And that could possibly lead to solitary</p> <p>8 confinement?</p> <p>9 MS. FELTON: Object to form.</p> <p>10 Q. (BY MR. FREE) Excuse me. Administrative</p> <p>11 segregation; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. And this is something that is explained</p> <p>14 to the detainees when they come in?</p> <p>15 A. It's in the handbook, yes.</p> <p>16 Q. And this is a uniform policy throughout</p> <p>17 all of the tiers in which ICE detainees are kept?</p> <p>18 MS. FELTON: Object to form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. FREE) Let me clarify. In each</p> <p>21 place where an ICE detainee is housed, does GEO use a</p> <p>22 cleanup list, like the ones we've just reviewed, to</p> <p>23 notify the detainees of their responsibilities for</p> <p>24 cleaning?</p> <p>25 A. I do not --</p>	87	<p>1 place?</p> <p>2 A. Yes. The system was in place when I</p> <p>3 started as a detention officer in 1995.</p> <p>4 Q. Maybe this first design may have dated</p> <p>5 back to that.</p> <p>6 A. No.</p> <p>7 Q. Okay. I kid. So let's now take a look</p> <p>8 at what we're going to mark as Exhibit 5 to this</p> <p>9 deposition.</p> <p>10 (Deposition Exhibit 5 was marked.)</p> <p>11 Q. Again, I'm sorry, but we do not have it</p> <p>12 in your binder, if you'll just slide that in at Tab 18</p> <p>13 of your deposition notebook. Take a look and review</p> <p>14 that, please, and let me know when I can ask you some</p> <p>15 questions about it.</p> <p>16 MS. FELTON: Is this 5?</p> <p>17 MR. FREE: It's Exhibit 5, correct.</p> <p>18 Q. (BY MR. FREE) At the bottom of the page,</p> <p>19 this is Plaintiffs 51, 52, 53, 54, and 55. Have you</p> <p>20 had a chance to look at that?</p> <p>21 A. Yes.</p> <p>22 Q. Do you recognize this document?</p> <p>23 A. Yes.</p> <p>24 Q. What is it?</p> <p>25 A. It is part of the detainee handbook local</p>
86	<p>1 MS. FELTON: Object to form.</p> <p>2 A. I do not know.</p> <p>3 Q. (BY MR. FREE) How else do they find out,</p> <p>4 if you know?</p> <p>5 A. I don't know how other facilities -- I'm</p> <p>6 sorry. I don't follow then.</p> <p>7 Q. I was just talking about the tiers in</p> <p>8 which the detainees in Aurora are housed. I'm not</p> <p>9 talking about anyplace else.</p> <p>10 A. Okay.</p> <p>11 Q. Okay. So everywhere that the detainees</p> <p>12 are housed, someone, maybe on graveyard shift, makes a</p> <p>13 list of who is going to clean up after a meal; is that</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. And then whether using this form or maybe</p> <p>17 some other form, the detainees are notified; is that</p> <p>18 right?</p> <p>19 A. Yes.</p> <p>20 Q. And this is not compensated work?</p> <p>21 A. Correct.</p> <p>22 Q. Since you became the assistant warden of</p> <p>23 operations in 2005 --</p> <p>24 A. Yes.</p> <p>25 Q. -- is this the system that's been in</p>	88	<p>1 supplement.</p> <p>2 Q. And is this one of the things or part of</p> <p>3 one of the handbooks that you testified earlier is</p> <p>4 provided to a detainee when he or she is admitted to</p> <p>5 the Aurora facility?</p> <p>6 A. Yes.</p> <p>7 Q. This section, Section VIII, at the bottom</p> <p>8 left-hand corner and what follows is the formal</p> <p>9 document that puts the detainee on notice of his or</p> <p>10 her obligations and rights under the discipline</p> <p>11 policy; is that right?</p> <p>12 A. Yes.</p> <p>13 MS. FELTON: Object to form.</p> <p>14 Q. (BY MR. FREE) Do they get this every</p> <p>15 time, this section of the handbook?</p> <p>16 MS. FELTON: Object to form.</p> <p>17 A. Yeah.</p> <p>18 Q. (BY MR. FREE) Every time a detainee is</p> <p>19 admitted --</p> <p>20 A. Yes, and they sign for it.</p> <p>21 Q. -- he or she signs memorializing that he</p> <p>22 or she received this policy?</p> <p>23 A. Yes.</p> <p>24 Q. Now, the only reason I wanted you to look</p> <p>25 at this, because I want to make sure I'm clear, if</p>

89

1 you'll turn to PL 54, the 300-level offense that you
 2 were referring to earlier, would that have been 306,
 3 refusal to clean assigned living area?
 4 A. Yes.
 5 Q. Okay. And that's in the high moderate
 6 offense category; is that right?
 7 A. Yes.
 8 Q. There are low moderate offense
 9 categories, but this is not in them; is that right?
 10 A. Yes. If you're referring to the 400
 11 level, yes.
 12 Q. That is right. And in the list of
 13 sanctions that apply to high moderate offenses,
 14 detainees are informed through this document that GEO
 15 could initiate criminal proceedings?
 16 MS. FELTON: Object to form.
 17 Q. (BY MR. FREE) Is that right?
 18 A. That's what is listed, yes.
 19 Q. I'm going to ask whether these other
 20 sanctions could follow from a 306 violation. I think
 21 the one we talked about earlier was a disciplinary
 22 segregation, up to 72 hours, right?
 23 A. Yes.
 24 Q. They could lose a job; is that right?
 25 A. Yes.

90

1 Q. They could be given a disciplinary
 2 transfer; is that right?
 3 A. That's what is listed.
 4 Q. That is GEO's policy?
 5 MS. FELTON: Object to form.
 6 A. This comes out of the PBNDS.
 7 Q. (BY MR. FREE) I'm sorry. I thought you
 8 said it was in the ICE detainee handbook.
 9 A. Yes, but it's based off of the PBNDS.
 10 Q. Is it your understanding that if there's
 11 a discrepancy between GEO's policy or practice and the
 12 PBNDS, the PBNDS controls; in other words, GEO must
 13 follow the PBNDS?
 14 MS. FELTON: Object to form.
 15 A. Yes. It is part -- it's tied to the
 16 contract.
 17 Q. (BY MR. FREE) Okay. Yes, exactly. So
 18 GEO, as part of the contract, has agreed to abide by
 19 the PBNDS; is that right?
 20 A. Yes.
 21 Q. To the extent this ICE detainee handbook
 22 that's given to the detainees contains things that
 23 aren't explicitly mentioned in the PBNDS, it's GEO's
 24 requirement that these things comply with the PBNDS,
 25 right?

91

1 MS. FELTON: Object to form.
 2 A. I don't understand.
 3 Q. (BY MR. FREE) Okay. The PBNDS does not
 4 contain all of these lists of codes, right?
 5 A. I'm pretty sure they do.
 6 Q. Okay. We'll come back to that.
 7 A. I'm pretty sure.
 8 Q. This is taken directly from the PBNDS?
 9 A. I'm pretty sure.
 10 Q. And that's 2008, 2011?
 11 A. It's been in the last two versions, the
 12 2008 and the 2011.
 13 Q. Okay.
 14 A. That's where we get it from.
 15 Q. As part of your duties as assistant
 16 warden of operations, have you ever seen a document
 17 called a statement of work?
 18 A. That sounds like something that would be
 19 in the contract.
 20 Q. Okay. Do you have any understanding as
 21 to what the purpose of that document is?
 22 MS. FELTON: Object to form.
 23 Q. (BY MR. FREE) No?
 24 A. It's in the contract.
 25 Q. Okay.

92

1 A. And we abide by it.
 2 Q. Okay. So the statement of work is
 3 something that would be in the contract and GEO would
 4 have to abide by it; is that right?
 5 A. Yeah.
 6 MS. FELTON: Object to form. She can't
 7 answer the question if she doesn't know what document
 8 you're talking about. She said she thinks it's part
 9 of the contract.
 10 MR. FREE: Fair.
 11 Q. (BY MR. FREE) You were prepared to
 12 testify about the existence and location of documents
 13 regarding employees, contractors, or others performing
 14 work in the Aurora Detention Facility and other GEO
 15 facilities that is the same or similar as work
 16 performed under the housing unit sanitation policy,
 17 what the scope of their work would be, and what the
 18 value of their services is. I've just read from 2 f
 19 of your 30(b)(6) deposition notice. You told me
 20 earlier you were prepared to testify about that; is
 21 that right?
 22 MS. FELTON: I'm going to object to form
 23 only because she was not designated to testify as to
 24 other facilities.
 25 MR. FREE: Fair, but the rest of it. I'm

93	<p>1 just excluding and other GEO facilities. We can deal 2 with that later.</p> <p>3 MS. FELTON: Yes.</p> <p>4 Q. (BY MR. FREE) You're prepared to testify 5 about that, right?</p> <p>6 A. Yes.</p> <p>7 Q. Where would you find documents regarding 8 employees, contractors, or others performing work in 9 Aurora that's the same or similar to those performed 10 in the housing unit sanitation policy?</p> <p>11 A. Can you specify?</p> <p>12 Q. Sure. I'll tell you what, just so we're 13 all on the same page literally, let's turn back to the 14 exhibit. It's Exhibit 1, which is the 30(b)(6) 15 deposition notice. I've looked at page 3 of the 16 notice, which is 2 f. Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Do any documents exist that would help us 19 understand the answers to this topic?</p> <p>20 A. For employees, all of our employee 21 records are kept with human resources. Contractors, 22 some of it is with human resource, because they have 23 to go through the background check through ICE, and 24 some of those are kept with the programs manager in 25 regards to training and things along that line that</p>	95	<p>1 under the housing unit sanitation policy?</p> <p>2 A. Hold on. I'm referring back in my head 3 to the policy.</p> <p>4 Q. Take all of the time you need. And if 5 you want, we've got the policy.</p> <p>6 A. Which tab is that one?</p> <p>7 Q. That is at 7. You're going to want to 8 turn to the page marked -- actually, it's going to be 9 easier, I think, to go to 8. So we're looking at 10 GEO -- this is Exhibit 3 -- 1419, 1420, 1421, and 11 behind that there's also a newer policy at 1510, 1511, 12 1512, and 1513.</p> <p>13 A. No.</p> <p>14 Q. Okay. I thought when we were looking at 15 the housekeeping plan -- that's 1508 -- that you told 16 me that -- and granted this is an old one -- you told 17 me that maintenance was doing the wiping down of 18 surfaces with a cloth for light fixtures and vents and 19 air ducts. That's the bottom row in that table on the 20 right-hand side.</p> <p>21 A. Yes.</p> <p>22 Q. So there's somebody that does some of 23 this; is that right?</p> <p>24 A. Yes.</p> <p>25 Q. Somebody who is not a detainee?</p>
94	<p>1 they have to go through.</p> <p>2 Q. What about others performing work?</p> <p>3 A. Employees and contractors cover 4 everything, because everybody that comes into the 5 building has to go through the clearance process. So 6 others, it's pretty much all inclusive between 7 employees and contractors.</p> <p>8 Q. Nobody volunteers to come in and do 9 anything in the housing unit sanitation policy, right?</p> <p>10 A. No.</p> <p>11 Q. Okay. So I just want to focus, though, 12 on the topic, which is documents that deal with these 13 people, the employees, contractors -- we can eliminate 14 others -- and the scope of the work, something that's 15 the same or similar to the housing unit sanitation 16 policy. Do you know of any documents that could help 17 us understand who else performs the work that 18 detainees perform under the housing unit sanitation 19 policy?</p> <p>20 MS. FELTON: Object to form.</p> <p>21 MR. FREE: What's the objection?</p> <p>22 MS. FELTON: You're assuming that there 23 are those people.</p> <p>24 Q. (BY MR. FREE) Are there those people? 25 Is there anybody else who performs the work performed</p>	96	<p>1 A. Then I'm confused by your question.</p> <p>2 Q. Tell me what's confusing you.</p> <p>3 A. Because there is a section in here that 4 talks about what maintenance will do.</p> <p>5 Q. Okay. Show me that section, please.</p> <p>6 A. It's 1512, H.</p> <p>7 Q. Okay. So this is one of the sources of 8 documents we can look at and see, you know, who else 9 is doing some work under the sanitation policy, 10 but . . .</p> <p>11 A. And for I, medical cleans up the fluids.</p> <p>12 Q. I see.</p> <p>13 MS. FELTON: Maybe I can help. Because 14 the policy is a total sanitation policy. So if your 15 question is a total building sanitation, you're going 16 to get one answer. If your question is detainee 17 sanitation, you're going to get a different answer.</p> <p>18 MR. FREE: I really appreciate that 19 clarification, Counsel. Thank you. What we're 20 talking about is just detainee sanitation.</p> <p>21 MS. FELTON: I know what you're talking 22 about.</p> <p>23 MR. FREE: Thanks. That's why they pay 24 you the big bucks.</p> <p>25 THE DEPONENT: Now I'm even more</p>

97

1 confused.

2 MS. FELTON: Sorry.

3 **Q. (BY MR. FREE) So I guess what I'm going**

4 **to look at then is back where I started, which is**

5 **Tab 7.**

6 A. Tab 7. Okay.

7 **Q. And we're at page 55 and 56.**

8 MR. FREE: I'll just ask this question

9 and then we'll ask that one.

10 A. 55?

11 **Q. (BY MR. FREE) And 56, yes, please. Your**

12 **counsel has told me that we're not talking about the**

13 **whole facility sanitation policy. In Section V of the**

14 **ICE detainee handbook, it says, "There will be an**

15 **organized, supervised and continuous program of daily**

16 **cleaning by all detainees to maintain these high**

17 **standards." We talked about that earlier.**

18 A. Yes.

19 **Q. And then on the next page, it says, "Each**

20 **and every detainee must participate in the facility's**

21 **sanitation program. A list of detainees is developed**

22 **each day by staff and is posted daily for viewing." I**

23 **think that that's the exhibit we looked at, which I**

24 **believe was Exhibit 5, that noted -- excuse me. It**

25 **was Exhibit 4 -- that noted the cleanup lists, right?**

98

1 A. Yes.

2 **Q. Okay. There's also general cleanup that**

3 **is listed separately in the housing unit sanitation**

4 **policy. Just follow along with me. It says, "During**

5 **a general cleanup all detainees must participate."**

6 **And are you telling me that's the cleanup that's**

7 **assigned every day by the person on the graveyard**

8 **shift, or is the general cleanup that detainees must**

9 **participate in something else?**

10 A. I believe I stated that earlier, that

11 it's all encompassing. So all of the detainees will

12 have a turn on this for general cleanup.

13 **Q. By "this," you're pointing to the cleanup**

14 **list?**

15 A. To the cleanup list, the one that is

16 posted every morning.

17 **Q. So that includes cleaning up the common**

18 **area --**

19 A. Yes.

20 **Q. -- right? It also includes cleaning**

21 **up -- by "it," I mean this housing unit sanitation**

22 **policy includes cleaning up your own living space?**

23 A. Yes.

24 **Q. It includes the windows and walls of the**

25 **common area as well?**

99

1 A. As I stated earlier, the walls in each

2 individual cell, because the toothpaste on the walls,

3 like I said, and the floors and stuff. So in that

4 common area, it's the tables and the sweeping and the

5 mopping of the floors.

6 **Q. Who cleans the windows and the walls in**

7 **the common area?**

8 A. Sometimes the housing unit trustee.

9 **Q. That's a voluntary work program person?**

10 A. Yes.

11 **Q. What about the other times?**

12 A. It's usually always that person.

13 **Q. Usually and always are not the same**

14 **thing. Is it always the trustee, or is it sometimes**

15 **someone else?**

16 A. I can't testify to every single time,

17 every single detainee. That's why I say usually,

18 because there's so many trustees and sometimes other

19 people may help out. It just depends.

20 **Q. Can you think of a circumstance in which**

21 **someone else would help out?**

22 A. Sometimes people just like to keep busy.

23 It makes the time go by faster.

24 **Q. Okay. I understand. So sometimes it's**

25 **not the voluntary work program person who is doing**

100

1 **this cleaning; sometimes it's someone that wants to**

2 **keep busy and wants to help?**

3 A. It's possible, yes.

4 **Q. Getting back to this 2 f in our**

5 **deposition notice, I think that I understand your**

6 **answer to be that because nobody else performs similar**

7 **work to the work described in the housing unit**

8 **sanitation policy, there's not another set of**

9 **documents out there that would tell us who is**

10 **performing this work?**

11 A. No, not to my knowledge.

12 **Q. Okay. Have you reviewed the statement of**

13 **work that's attached to GEO's most recent contract?**

14 A. Yes, I've read it.

15 **Q. In the statement of work, which has not**

16 **been provided to us at least -- so I'm just going off**

17 **of your recollection of it. In the statement of work,**

18 **is there a staffing plan?**

19 A. I would have to see it again. The

20 contract is very thick and the sections sometimes blur

21 into each other.

22 **Q. Have you ever seen the staffing plan for**

23 **the Aurora Detention Facility?**

24 A. Yes.

25 **Q. Are sanitation workers on the staffing**

101	<p>1 plan?</p> <p>2 A. Sanitation workers? What do you mean by</p> <p>3 "sanitation workers"?</p> <p>4 Q. Janitors, people who clean things up.</p> <p>5 A. Yes.</p> <p>6 Q. How many sanitation workers or janitors</p> <p>7 are on the staffing plan?</p> <p>8 A. One.</p> <p>9 Q. What is that person's name?</p> <p>10 A. Danielle Deets, D-e-e-t-s.</p> <p>11 Q. What is her job? What does she do in</p> <p>12 terms of her day?</p> <p>13 A. She will empty the trash and vacuum the</p> <p>14 carpets and clean the restrooms in the ICE</p> <p>15 administration area, the EOIR area, and the GEO</p> <p>16 administrative area.</p> <p>17 Q. Okay. Aside from what Danielle is doing,</p> <p>18 every other janitorial or sanitation task is performed</p> <p>19 by the detainees; is that correct?</p> <p>20 MS. FELTON: Object to form.</p> <p>21 A. No.</p> <p>22 Q. (BY MR. FREE) Who else performs those</p> <p>23 tasks?</p> <p>24 A. Maintenance sometimes does.</p> <p>25 Q. All right. Aside from Danielle and</p>	103	<p>1 Q. All right. How much roughly, if you</p> <p>2 know, is Danielle, the janitor, paid?</p> <p>3 A. I do not know. It is set by wage</p> <p>4 determination, Department of Labor.</p> <p>5 Q. So if we wanted to find that out, we</p> <p>6 would have to look at the wage determination that's</p> <p>7 attached to the GEO contract with ICE, right?</p> <p>8 A. Yes.</p> <p>9 Q. I've got page 37 in Exhibit 2. That's at</p> <p>10 Tab 7.</p> <p>11 MS. FELTON: Page which?</p> <p>12 MR. FREE: 37.</p> <p>13 Q. (BY MR. FREE) If you want to go back</p> <p>14 one, I'll just show you this is the wage</p> <p>15 determination --</p> <p>16 A. Yes.</p> <p>17 Q. -- that was revised on July 25, 2014.</p> <p>18 It's been filed with the court as document 18-2. So</p> <p>19 does it look to you like Daniel might get paid at</p> <p>20 least \$12 an hour?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. If you would bear with me for just</p> <p>23 a moment, I think we're through with this subject and</p> <p>24 can move on. Just a couple more housekeeping things.</p> <p>25 Okay. If you would please turn to Tab 10, we're going</p>
102	<p>1 maintenance, every janitorial or sanitation task is</p> <p>2 performed by the detainees; is that correct?</p> <p>3 A. No.</p> <p>4 Q. Who else performs those tasks?</p> <p>5 A. And let me explain.</p> <p>6 Q. Sure. Can you answer my question first</p> <p>7 and then explain? Who else performs those tasks?</p> <p>8 A. Everybody plays a role in that. For</p> <p>9 example, if I'm walking down the hallway and I see</p> <p>10 trash in the hallway, I'm going to pick it up. If a</p> <p>11 staff member goes into the staff lounge, they're going</p> <p>12 to pick up trash. I want to be clear on that, because</p> <p>13 everybody plays a part in the sanitation role.</p> <p>14 Q. That's fair. Who else's job is it to do</p> <p>15 that when they come to the facility that day or</p> <p>16 whether they're detained in the facility that day?</p> <p>17 A. It's everybody's job.</p> <p>18 Q. It's not your job to clean the windows</p> <p>19 and the walls, right?</p> <p>20 A. I have been known to clean windows. I</p> <p>21 just want to make that clear, because especially in my</p> <p>22 role as an assistant warden --</p> <p>23 Q. Set an example, yes, I understand.</p> <p>24 A. -- it's part of my role to set that</p> <p>25 example and lead by example.</p>	104	<p>1 to mark the entirety of Tab 10 as Exhibit 6 to today's</p> <p>2 deposition.</p> <p>3 (Deposition Exhibit 6 was marked.)</p> <p>4 Q. I don't want you to read the whole thing</p> <p>5 yet. I'm going to point you to a couple of pages.</p> <p>6 Okay?</p> <p>7 A. Okay.</p> <p>8 Q. This is pages 581 through 636 of your</p> <p>9 production to the plaintiffs in this case.</p> <p>10 MS. FELTON: This is 6?</p> <p>11 MR. FREE: This is Exhibit 6, that's</p> <p>12 right, Counsel.</p> <p>13 Q. (BY MR. FREE) You were talking earlier</p> <p>14 about the documents that accompany a detainee's file</p> <p>15 or may be forwarded to some person or another as a</p> <p>16 part of the disciplinary process. Do you remember</p> <p>17 that colloquy?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. I think that what we're looking at</p> <p>20 are some of those documents. I would like you to just</p> <p>21 help me understand them.</p> <p>22 A. Okay.</p> <p>23 Q. Okay. The first document, 581, do you</p> <p>24 recognize this document?</p> <p>25 A. Yes.</p>

105	<p>1 Q. Generally, what is it?</p> <p>2 A. It's a document that after the IDP</p> <p>3 hearing is held, if there's any disciplinary time</p> <p>4 imposed, this documents that amount of time and</p> <p>5 basically when the release date is.</p> <p>6 Q. So the IDP is the Institutional</p> <p>7 Disciplinary Panel?</p> <p>8 A. Yes.</p> <p>9 Q. This is regarding disciplinary</p> <p>10 segregation for one of the plaintiffs in this case,</p> <p>11 Mr. Brambila, right?</p> <p>12 A. Yes.</p> <p>13 Q. I see the prohibited act is fighting and</p> <p>14 the code is 201, so it's a 200-level offense?</p> <p>15 A. Yes.</p> <p>16 Q. And it looks like he's been imposed with</p> <p>17 seven days of disciplinary segregation; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. I'm reading all of that correctly. And</p> <p>20 then below, although it is redacted pretty heavily, we</p> <p>21 know it's Mr. Brambila. We know he's going to lose</p> <p>22 his commissary privileges. We don't really know much</p> <p>23 else behind that other than he's being put in</p> <p>24 disciplinary segregation. But all of this is typed</p> <p>25 up, right?</p>	107	<p>1 A. They have their own forms and then we go</p> <p>2 and type that and put our letterhead on it.</p> <p>3 Q. By "they," you mean ICE. They have their</p> <p>4 own forms, the "they" in that sentence is ICE has its</p> <p>5 own forms?</p> <p>6 A. Correct. ICE's form is attached to the</p> <p>7 PBNDS.</p> <p>8 Q. I understand. And then if we thumb</p> <p>9 through, we just have some logs. And I think those</p> <p>10 are the logs that you were describing earlier, the</p> <p>11 30-minute checks when you're in segregation. Do you</p> <p>12 see generally the logs I'm referring to?</p> <p>13 A. Yes.</p> <p>14 Q. These 30-minute checks are happening</p> <p>15 while the person is detained in the cell, is that</p> <p>16 right, in the segregation cell?</p> <p>17 MS. FELTON: Object to form.</p> <p>18 A. These checks are performed every 30</p> <p>19 minutes whether or not they're in the cell or not.</p> <p>20 Q. (BY MR. FREE) Okay. You could figure</p> <p>21 out, based on these 30-minute checks, how long the</p> <p>22 person spent in segregation; is that right?</p> <p>23 A. As long as these are all from the same</p> <p>24 incident with the same date, which I can't verify.</p> <p>25 Q. We can't either. I relate. If you look</p>
106	<p>1 A. This one is, yes.</p> <p>2 Q. Who typed it up or who would have typed</p> <p>3 it up?</p> <p>4 A. Either the chief of security would have</p> <p>5 typed it up or the administrative lieutenant.</p> <p>6 Q. Would that have been on a GEO computer?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And would they have saved this</p> <p>9 document?</p> <p>10 A. Probably not.</p> <p>11 Q. Okay. So is it the case that this is the</p> <p>12 type of document that would be available in a template</p> <p>13 form and you can just fill it in and print it out?</p> <p>14 A. Correct.</p> <p>15 Q. Let's look at the next document. What is</p> <p>16 this document? This is 582.</p> <p>17 A. This is an administrative segregation</p> <p>18 order.</p> <p>19 Q. And what's the function of this document?</p> <p>20 A. This is the one that I referred to</p> <p>21 earlier, that if somebody is pending disciplinary or</p> <p>22 any of those A through G, it would be checked and put</p> <p>23 into the file. This form is originally from ICE and</p> <p>24 was attached to the PBNDS.</p> <p>25 Q. It was edited by The GEO Group?</p>	108	<p>1 at 596, do you recognize this document?</p> <p>2 A. It's a charging packet.</p> <p>3 Q. It's titled "Incident of Prohibited Acts</p> <p>4 and Notice of Charges." Is that right?</p> <p>5 A. Yes, that is the title.</p> <p>6 Q. And the prohibited act is listed as</p> <p>7 fighting and the code is 201. You note that there's a</p> <p>8 work assignment here as a maintenance trustee. Do you</p> <p>9 see that?</p> <p>10 A. Yes.</p> <p>11 Q. Why is that on there?</p> <p>12 A. I can assume that he applied to be a</p> <p>13 maintenance trustee and met the qualifications and was</p> <p>14 selected and trained to be the maintenance trustee.</p> <p>15 Q. Okay. It's true, isn't it, that one of</p> <p>16 the consequences of being hit with a disciplinary</p> <p>17 infraction, even at the 300 level, is losing your job?</p> <p>18 MS. FELTON: Object to form.</p> <p>19 A. Let me clarify what you said. You said</p> <p>20 being hit with that.</p> <p>21 Q. (BY MR. FREE) Excuse me.</p> <p>22 A. If it goes through the process and the</p> <p>23 hearing is completed and the person conducting the</p> <p>24 hearing decides to choose that as an option, then,</p> <p>25 yes.</p>

109

1 **Q. Okay. The next page, page 597, do you**
 2 **recognize the format of this document?**
 3 A. Yes. It's the investigation report.
 4 **Q. What's the function of this document?**
 5 A. This is where a lieutenant will
 6 investigate the notice of charges. So in this
 7 instance, they were investigating what happened during
 8 the fight and they put down their findings.
 9 **Q. Okay. And do you see the date and time**
 10 **that the investigation began there at the bottom?**
 11 A. Yes.
 12 **Q. What time did it begin, on what date?**
 13 A. October 22, 1819.
 14 **Q. All right. And based on the discussion**
 15 **earlier, while this was going on, while this**
 16 **investigation was happening, it's my understanding**
 17 **that Mr. Brambila, one of our clients, would have been**
 18 **in administrative segregation; is that right?**
 19 A. Correct. And that's why that previous
 20 form was checked that he was in administrative
 21 segregation pending investigation of rules infraction.
 22 **Q. I see. If we just continue to thumb**
 23 **through and stop at 604, is it fair to say that the**
 24 **documents we just looked at are going to be created**
 25 **whenever a person is charged with a disciplinary**

110

1 **infraction and given a UDC?**
 2 A. Yes, for any rules violation.
 3 **Q. So anytime that happens, there should be**
 4 **a record of it?**
 5 A. If they're charged, yes.
 6 **Q. If they're charged. If we wanted to**
 7 **figure out what the basis for the charge is, what**
 8 **would be the best one of these documents to look at?**
 9 A. Do you mean why they were charged?
 10 **Q. Yes, which code it would be.**
 11 A. Then it would be the first page of the
 12 charge packet, which is the incident of prohibited
 13 acts and notice of charges.
 14 **Q. So that would be 596; is that right?**
 15 A. Yes.
 16 **Q. Is this the type of document that you**
 17 **were referring to when you testified earlier that**
 18 **sometimes you would get it by e-mail?**
 19 A. Yes.
 20 **Q. Okay. Is there any other type of**
 21 **document you would have received by e-mail in the**
 22 **instances where the lieutenant provided it to you?**
 23 A. I don't understand.
 24 **Q. Is there anything else you would have**
 25 **gotten by e-mail from the lieutenant when they were**

111

1 **notifying you that someone had been placed in ad seg**
 2 **and was going to be undergoing an investigation,**
 3 **anything else you would have gotten?**
 4 A. No.
 5 **Q. Okay. Thank you.**
 6 A. You're welcome.
 7 **Q. Are you required to report to ICE when**
 8 **you place someone in administrative segregation?**
 9 A. Yes.
 10 **Q. How do you do that?**
 11 A. Usually the lieutenant will send an
 12 e-mail.
 13 **Q. What about the other times?**
 14 A. Not everybody that even they're notified
 15 is charged with something. So anytime somebody goes
 16 to seg, they want to know, because there's time lines
 17 that have to be followed on reviews.
 18 **Q. I think I understand. So anytime a**
 19 **detainee is placed in administrative segregation, a**
 20 **lieutenant is going to e-mail ICE?**
 21 A. Yes. Usually it's the lieutenant.
 22 **Q. Or someone is going to e-mail ICE?**
 23 A. Correct, unless it's ICE placing them in
 24 administrative segregation themselves.
 25 **Q. Okay. Now, you said usually an e-mail is**

112

1 **sent. How else would ICE be notified?**
 2 A. Via telephone.
 3 **Q. Okay. Do you think it's more often that**
 4 **ICE is notified by e-mail or telephone, just in your**
 5 **experience?**
 6 A. I would really say it varies. Sometimes
 7 the lieutenant maybe can't get to the e-mail right
 8 away and, therefore, my chief of security or myself or
 9 even the warden may contact ICE to say, hey, this is
 10 what we have going on, just to keep them in the loop.
 11 **Q. You do that by telephone, e-mail?**
 12 A. Telephone. I can walk next door to their
 13 office.
 14 **Q. Okay. Who are you e-mailing to at ICE?**
 15 A. Usually it is -- well, always it's going
 16 to be the COTAR.
 17 **Q. The contracting officer's technical**
 18 **representative?**
 19 A. Yes. The AFOD.
 20 **Q. The assistant field office director?**
 21 A. Yes. And both SDDOs.
 22 **Q. And both of the supervisory detention**
 23 **deportation officers?**
 24 A. Yes.
 25 **Q. Anybody else?**

113

1 A. No.

2 **Q. And when they get an e-mail, do they ever**

3 **e-mail you back?**

4 A. Sometimes. Most of the time we'll pick

5 up the phone. It's a lot easier to communicate

6 verbally than it is over the computer.

7 **Q. Without telling me any of the A numbers**

8 **or anything like that, are you using A numbers, or are**

9 **you using some other identifier to indicate to ICE who**

10 **is being put in ad seg?**

11 A. Usually it's a combination of A numbers

12 and names.

13 **Q. Any other pattern that would be followed**

14 **here?**

15 A. No.

16 **Q. Okay. Is there like a magic word that**

17 **one could type into a search function and it's always**

18 **going to be in that e-mail, like segregation or --**

19 A. No.

20 **Q. -- solitary?**

21 A. I don't use the word "solitary," nor does

22 anybody else at the facility.

23 **Q. Except for the people in it.**

24 A. Excuse me?

25 **Q. Except for the people in it. The**

114

1 **question is: Are there common phrases we could use to**

2 **look in your e-mail and say that's going to be an**

3 **e-mail about notification for administrative**

4 **segregation?**

5 A. No.

6 **Q. No. It's just going to be --**

7 A. A number and/or name.

8 **Q. And then what is the e-mail going to**

9 **contain in the body?**

10 A. Well, the person -- well, you already

11 have the A number and the name, and why they're going

12 to administrative segregation.

13 **Q. You're going to have to tell them**

14 **something about administrative segregation in order to**

15 **tell them they're in administrative segregation,**

16 **right?**

17 A. That's why I said the why, the reason.

18 **Q. That word "segregation" or**

19 **"administrative segregation" or some derivation of it**

20 **should be in the e-mail most of the time, right?**

21 A. Most of the time.

22 **Q. Any other things that might be in those**

23 **e-mails?**

24 A. No.

25 MR. FREE: Okay. Let's go off the record

115

1 for just a moment. We're going off the record at

2 12:12.

3 (Discussion off the record.)

4 MR. FREE: We're back on the record at

5 12:13.

6 **Q. (BY MR. FREE) So is there anything about**

7 **your testimony regarding the housing unit sanitation**

8 **policy that you need to alter, amend, or change in any**

9 **way?**

10 A. No.

11 **Q. Everything you said, as far as you know,**

12 **is an accurate reflection of GEO's policies,**

13 **documents, everything that we've noticed in the**

14 **deposition; is that right?**

15 A. Yes.

16 **Q. Great. Thank you.**

17 A. You're welcome.

18 **Q. My cocounsel has made a liar out of me.**

19 **I'm going to ask you one more question. If you would**

20 **look back --**

21 MS. FELTON: That was on the record,

22 right?

23 MR. FREE: Absolutely on the record.

24 Absolutely on the record.

25 **Q. (BY MR. FREE) We're going to look at**

116

1 **Tab 18. This is Exhibit 5. We're going to look at PL**

2 **54. And we're looking at under "Sanctions" in the**

3 **right-hand column, there's this K, restrict to housing**

4 **unit. Mr. Hood wants to know what that means. What**

5 **does it mean?**

6 A. I have no idea. We have never used it,

7 but these are the same sanctions that come from the

8 PBNDS.

9 MR. TURNER: Maybe we should take a

10 moment off record and break before we leave this.

11 MR. FREE: Okay. We're going to take a

12 break.

13 THE DEPONENT: Okay.

14 MR. FREE: Let's go off the record at

15 12:14. Thanks.

16 (Recess taken, 12:17 p.m. to 1:19 p.m.)

17 MR. FREE: We are back on the record at

18 1:17 after a lunch break. All of the same attorneys

19 and the same deponent are in the room.

20 **Q. (BY MR. FREE) First of all, anything you**

21 **remember during lunch that you want to change, modify,**

22 **amplify, correct about your testimony earlier today?**

23 A. No.

24 **Q. Everything is still completely true and**

25 **correct?**

117

1 A. Yes.

2 **Q. Great. When you're in disciplinary**

3 **segregation, are you given two hours of social time?**

4 A. No.

5 **Q. How much social time are you given when**

6 **you're in disciplinary segregation?**

7 A. As I stated earlier, no social time for

8 disciplinary segregation.

9 **Q. I thought that's what you said. I just**

10 **wanted to make sure. Do you get rec time?**

11 A. Yes.

12 **Q. How much?**

13 A. Up to two hours.

14 **Q. Okay. So when you're in disciplinary**

15 **segregation, you're going to be in your cell for 22**

16 **hours a day; is that right?**

17 A. Yes.

18 **Q. Unless you're in medical or somewhere**

19 **else?**

20 A. Or shower, yes.

21 **Q. Are there 30-minute checks for both ad**

22 **seg and disciplinary seg?**

23 A. Yes.

24 **Q. What is the purpose of the checks?**

25 A. To ensure the safe well-being of those

118

1 inside, make sure nobody has committed suicide, or has

2 had a medical condition.

3 **Q. Are they at a heightened risk of suicide**

4 **when they're in those cells?**

5 A. No.

6 **Q. Do you do 30-minute checks when they're**

7 **in the general population?**

8 A. Yes.

9 **Q. Is it ever the case that people have**

10 **defaced the cells or flooded the cells or thrown feces**

11 **at the windows when you're putting them in**

12 **administrative segregation or disciplinary**

13 **segregation?**

14 A. There have been times that detainees have

15 done that, yes.

16 **Q. Have detainees attempted to harm**

17 **themselves when they're in disciplinary or**

18 **administrative segregation?**

19 A. No.

20 **Q. No. Nobody has slammed his head up**

21 **against the wall or something like that?**

22 A. Well, they have. They've kind of knocked

23 their head on the door, but not to the point where it

24 has injured them.

25 **Q. Okay. Have people sought additional**

119

1 **psychiatric treatment after having been placed in**

2 **disciplinary or administrative segregation?**

3 A. It's required that they are seen from the

4 medical department prior to even being placed into

5 administrative, disciplinary, or protective custody,

6 into that unit, to ensure, like I said earlier, that

7 there's no mental health issues, and then mental

8 health will come down and check on those that are

9 housed in there as well.

10 **Q. How often?**

11 A. I would have to check. It depends on who

12 is down there. If they're actively seeing mental

13 health, sometimes mental health will go down,

14 sometimes the detainee will be taken down to mental

15 health in the medical department.

16 **Q. Okay. Thank you. I'm going to talk for**

17 **a moment now about topic No. 3 in our deposition**

18 **notice. That's back at Tab 1, Exhibit 1. As you'll**

19 **recall, topic 3 regards the policies and practices**

20 **regarding the voluntary work program in the Aurora**

21 **Detention Facility over the last three years prior to**

22 **the time the litigation was filed up until the**

23 **present. Okay. So three years before we filed up**

24 **until now.**

25 A. Yes.

120

1 **Q. There's some specific parts of that. But**

2 **before we get started, has there always been a**

3 **voluntary work program at the Aurora facility?**

4 A. Yes.

5 **Q. How many people approximately participate**

6 **in it per day?**

7 MS. FELTON: Object to form.

8 A. It varies each day. However, I would say

9 on average there's anywhere from 60 to 70.

10 **Q. (BY MR. FREE) Okay.**

11 A. Approximately.

12 **Q. And has that number fluctuated at all or**

13 **has it gone up, down, or is it fairly constant?**

14 A. It fluctuates all of the time, you know,

15 number one, due to turnover. We have huge turnover.

16 The average length of stay is pretty short. And in --

17 well, that was the old facility, so that's out of that

18 time frame. So, yeah, it fluctuates. It just depends

19 on who puts in applications, where they want to work,

20 and if there's openings.

21 **Q. During this period that we're going to**

22 **talk about -- I want to make sure we're not going way,**

23 **way back -- we're just talking about this three-year**

24 **period before we filed litigation up until now.**

25 A. Yes.

121	<p>1 Q. Was it roughly 60 to 70 participants in</p> <p>2 the voluntary work program per day?</p> <p>3 A. Yes.</p> <p>4 Q. We looked at this a little bit earlier in</p> <p>5 Tab 7. It was the ICE Performance-Based National</p> <p>6 Detention Standard setting forth the federal</p> <p>7 government's rules on the voluntary work program.</p> <p>8 That's at page 46. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So I think you told me before this</p> <p>11 is the PBNDS standard from 2011, modified in 2013.</p> <p>12 You didn't tell me that, but this is the PBNDS</p> <p>13 standard for the voluntary work program; is that</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. And GEO is required to follow this</p> <p>17 standard?</p> <p>18 A. Yes.</p> <p>19 Q. If you'll turn the page to page 47, under</p> <p>20 Section C, there's a -- this is within the section</p> <p>21 entitled "Expected Practices." I'm looking at</p> <p>22 Section C. It does say that personal housekeeping is</p> <p>23 required. Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Work assignments are voluntary -- and</p>	123	<p>1 again.</p> <p>2 Q. Take a look.</p> <p>3 A. And what were you looking for?</p> <p>4 Q. I'm just looking for anything else that</p> <p>5 was work detainees must perform that is not voluntary.</p> <p>6 In other words, you have the voluntary work program</p> <p>7 and you have Section V C in the PBNDS saying, "Work</p> <p>8 assignments are voluntary"; -- that's on page 47 --</p> <p>9 "however, all detainees are responsible for personal</p> <p>10 housekeeping." And then it lists what that personal</p> <p>11 housekeeping entails.</p> <p>12 MS. FELTON: I'm going to object, because</p> <p>13 what she's looking at is only Section 5.8 of the</p> <p>14 PBNDS. So if your question is whether there's</p> <p>15 anything anywhere in the PBNDS, she's not looking at</p> <p>16 the whole thing.</p> <p>17 MR. FREE: That's fair. And I will</p> <p>18 stipulate that we only have 5.8 of the PBNDS in front</p> <p>19 of you.</p> <p>20 Q. (BY MR. FREE) So let's take a second and</p> <p>21 lay some foundation. Is there any other part of the</p> <p>22 PBNDS that allows a person responsible for detaining</p> <p>23 ICE detainees to force them to work?</p> <p>24 MS. FELTON: Object to form.</p> <p>25 A. I don't understand your question when you</p>
122	<p>1 those are work assignments within the VWP -- however,</p> <p>2 the PBNDS provides that all detainees are responsible</p> <p>3 for personal housekeeping. Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And then the PBNDS goes on to list</p> <p>6 what -- in explicit terms, four parts of personal</p> <p>7 housekeeping. Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Those four parts are preceded by the</p> <p>10 sentence, "Detainees are required to maintain their</p> <p>11 immediate living areas in a neat and orderly manner</p> <p>12 by: No. 1 making their bunk beds daily; No. 2</p> <p>13 stacking loose papers; No. 3 keeping the floor free of</p> <p>14 debris and dividers free of clutter; and No. 4</p> <p>15 refraining from hanging/draping clothing, pictures,</p> <p>16 keepsakes, or other objects from beds, overhead</p> <p>17 lighting fixtures or other furniture." Do you see</p> <p>18 that?</p> <p>19 A. Yes.</p> <p>20 Q. I don't see anywhere in the Performance-</p> <p>21 Based National Detention Standard where there's</p> <p>22 anything else under the personal housekeeping</p> <p>23 requirement that's listed by ICE. Do you see anything</p> <p>24 else?</p> <p>25 A. I would have to go through it and read it</p>	124	<p>1 say force to work.</p> <p>2 Q. (BY MR. FREE) I'll rephrase. Thank you</p> <p>3 for clarifying that you didn't understand. Is there</p> <p>4 anything in the Performance-Based National Detention</p> <p>5 Standards that expands the scope of work that</p> <p>6 detainees may be required to do?</p> <p>7 A. Maybe not in the PBNDS, but I would also</p> <p>8 want to check the contract to see if there's anything</p> <p>9 specific.</p> <p>10 Q. That's a great idea. Let's look at it.</p> <p>11 If you turn to page 14 of the same tab, Tab 7, do you</p> <p>12 see at the top it says, "Section H - Special Contract</p> <p>13 Requirements"?</p> <p>14 A. Yes.</p> <p>15 Q. And I will proffer to you that if you go</p> <p>16 backward, you're going to find that this is part of</p> <p>17 the GEO contract that has been disclosed to the</p> <p>18 plaintiffs in heavily redacted form at GEO Menocal</p> <p>19 Bates 1 all of the way to this page, page 14. This is</p> <p>20 all part of their contract.</p> <p>21 A. Okay.</p> <p>22 Q. Okay. Does that look right to you, that</p> <p>23 that's all part of the contract?</p> <p>24 A. Yes.</p> <p>25 Q. So it says, "The following</p>

125	<p>1 constraints" -- this is at Section H-5. The previous</p> <p>2 several paragraphs are blocked out. We can't see</p> <p>3 them. "The following constraints comprise the</p> <p>4 statutory, regulatory, policy and operational</p> <p>5 consideration that will affect the contractor." It</p> <p>6 says, "Constraints include, but are not limited to" --</p> <p>7 if you turn the page and go to page 15, you look at</p> <p>8 No. 10 --</p> <p>9 A. Yes.</p> <p>10 Q. -- it says the PBNDS. In this one, it</p> <p>11 says 2008, so I'm a little confused about the</p> <p>12 testimony earlier that 2011 applies. It's okay. For</p> <p>13 our purposes, we're just going to agree that '11 is</p> <p>14 what applies, right?</p> <p>15 A. 2011 does apply because there was a</p> <p>16 contract modification that incorporates all of the</p> <p>17 2011 standards into the current contract.</p> <p>18 Q. So we don't have that, but maybe we'll</p> <p>19 get it. Do you know if that contract modification</p> <p>20 alters in any way the voluntary work program?</p> <p>21 A. From what I recall, is that it</p> <p>22 incorporates the 2011 PBNDS, so everything that's in</p> <p>23 the PBNDS applies.</p> <p>24 Q. Got it. So if you look at the things</p> <p>25 that the contractor must follow, the statutory,</p>	127	<p>1 Q. Thank you. Now, I want to look back to</p> <p>2 page 11, Tab 7.</p> <p>3 A. Same tab?</p> <p>4 Q. Yes, same tab. Again, this is part of</p> <p>5 the contract.</p> <p>6 A. Yes.</p> <p>7 Q. And do you see the section where it says,</p> <p>8 "Voluntary Work Program"?</p> <p>9 A. Yes.</p> <p>10 Q. And bullet point No. -- or point No. 2</p> <p>11 says, "Detainees will be able to volunteer for work</p> <p>12 assignments but otherwise not be required to work,</p> <p>13 except to do personal housekeeping." Do you see that?</p> <p>14 A. Yes. It reiterates No. 2 in the PBNDS.</p> <p>15 Q. What do you mean, No. 2?</p> <p>16 A. No. 2 in the voluntary work program.</p> <p>17 Q. What page are you looking at? I'm sorry.</p> <p>18 A. I'm sorry. 46.</p> <p>19 Q. Okay. So this is essentially a</p> <p>20 restatement of, on page 46 on the right-hand column,</p> <p>21 "Expected Outcomes," No. 2, "Detainees shall be able</p> <p>22 to volunteer for work assignments but otherwise shall</p> <p>23 not be required to work, except to do personal</p> <p>24 housekeeping"?</p> <p>25 A. Yes.</p>
126	<p>1 regulatory, policy and operational consideration,</p> <p>2 No. 10 says the PBNDS. Does that make sense?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So when you say you're going to</p> <p>5 have to look at the contract, the contract requires</p> <p>6 GEO to follow the PBNDS, right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Now, you seem like you want to say</p> <p>9 something else.</p> <p>10 A. I just want to make sure that we're on</p> <p>11 the same page here.</p> <p>12 Q. Sure.</p> <p>13 A. Because I understand that this</p> <p>14 incorporates the 2008. However, there might be a</p> <p>15 section in the contract that also refers to other</p> <p>16 sections in the contract that would reflect back on</p> <p>17 the PBNDS, if that makes sense.</p> <p>18 Q. As far as you know, the PBNDS that is in</p> <p>19 front of you is the one that's in force and the one</p> <p>20 that GEO follows?</p> <p>21 A. Yes.</p> <p>22 Q. And as far as you know, there's nothing</p> <p>23 else in the PBNDS that would permit GEO to require</p> <p>24 additional work by detainees?</p> <p>25 A. Correct.</p>	128	<p>1 Q. Great. I understand. If someone wants</p> <p>2 to know what is personal housekeeping, then we look at</p> <p>3 V, the next page, page 47, and that's Section V C?</p> <p>4 A. Yes.</p> <p>5 Q. Great. Okay. If you would then to page</p> <p>6 53 in the same Tab 7, and this is part of what I think</p> <p>7 we identified earlier as the ICE detainee handbook</p> <p>8 that is provided to each ICE detainee who is admitted</p> <p>9 into the Aurora facility. Does that sound right to</p> <p>10 you?</p> <p>11 A. Yes, the local supplement.</p> <p>12 Q. The local supplement. So this is unique</p> <p>13 to GEO Aurora?</p> <p>14 A. Yes.</p> <p>15 (At this time Mr. Hood left the room.)</p> <p>16 Q. Do you see the part, in the right-hand</p> <p>17 column at the top, it says, "Detainee Work Program</p> <p>18 (Voluntary)"?</p> <p>19 A. Yes.</p> <p>20 Q. Now in the second paragraph, it says,</p> <p>21 "All work is done on a voluntary basis, except that</p> <p>22 work which is customarily required for cleaning your</p> <p>23 living area." Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Is it your understanding that the work</p>

129

1 that is customarily required under this policy that's
 2 in front of you is the work that we talked about
 3 earlier today in the housing unit sanitation policy?
 4 A. Yes, as I stated earlier.
 5 Q. Okay. That's what I thought you said.
 6 So, really, just to tie this together, detainee work
 7 program is voluntary, but there's also this other work
 8 that's in this GEO Aurora policy here on page 53 that
 9 says there's work which is customarily required for
 10 cleaning your living area. Do you follow me so far?
 11 A. Yes.
 12 Q. And then when we want to know what that
 13 is, then we look at things like Tab 16, the housing
 14 unit sanitation policy tasks, in addition to the
 15 personal housekeeping that you would do in your own
 16 area; is that right?
 17 A. Yes.
 18 Q. Okay.
 19 A. Maybe I don't understand what you're
 20 asking.
 21 Q. Okay.
 22 A. I want to make sure I understand
 23 correctly.
 24 Q. All right. Do you have a specific part
 25 where we broke down?

130

1 A. Are you talking about the living area? I
 2 feel like it's a semantic issue, so I want to make
 3 sure I understand what you're actually asking.
 4 Q. Well, we've read the PBNDS and we've read
 5 the contract and both of those things say personal
 6 housekeeping. We've agreed that that's those four
 7 things that are listed in the PBNDS, right?
 8 A. Right. It says immediate living area.
 9 (At this time Mr. Hood entered the room.)
 10 Q. Yes. We talked about earlier how you
 11 have this immediate living area and then you have
 12 these four specifically listed things behind the
 13 colon, No. 1, No. 2, No. 3, No. 4, and that's personal
 14 housekeeping, right?
 15 A. Yes.
 16 Q. But this morning we spent a lot of time
 17 talking about the housing unit sanitation policy that
 18 detainees are required to engage in that's outside of
 19 the voluntary work program. Do you recall that
 20 discussion just generally?
 21 A. Yes.
 22 Q. And that included things that were
 23 broader, I think, than just cleaning up -- just doing
 24 the four tasks listed in the PBNDS, right? It had to,
 25 because -- let me just make --

131

1 A. Go ahead.
 2 Q. -- sure you understand where I'm going.
 3 It had to, because the PBNDS says nothing about
 4 cleaning up your tables after lunch, it says nothing
 5 about getting a broom and mop and wiping down
 6 surfaces, it says nothing about detainees being
 7 required to engage in the sanitation of the whole
 8 facility, right, PBNDS doesn't say that?
 9 A. It says immediate living area. And as I
 10 said earlier, I consider that part of the immediate
 11 living area. They're living in that area.
 12 Q. I see. So your immediate living area is
 13 anywhere in the common area in addition to your bunk?
 14 A. I said that earlier, because in that
 15 section in the PBNDS before those four things, it says
 16 immediate living area.
 17 Q. Okay. Let's look at that. It's page 47.
 18 A. Okay. Go ahead.
 19 Q. Let's look at the italicized section that
 20 says, "Detainees are required to maintain their
 21 immediate living areas in a neat and orderly manner"
 22 and then it says "by" and then it provides a list of
 23 four kinds of tasks.
 24 A. Yes.
 25 Q. We said that there's nothing else in the

132

1 PBNDS that adds to this list, right, these are the
 2 four?
 3 A. Yes, but it says immediate living area.
 4 Q. Okay. So it's your testimony today that
 5 because the PBNDS says the words "immediate living
 6 areas" followed by "in a neat and orderly manner by,"
 7 GEO is permitted to expand the tasks that it can force
 8 detainees to perform beyond these four categories
 9 listed in the PBNDS?
 10 MS. FELTON: Object to form.
 11 A. And I disagree with how you say that,
 12 because we're not forcing anybody. ICE writes these
 13 and we follow them and it says immediate living area.
 14 Q. (BY MR. FREE) But then it says four
 15 things, right?
 16 A. Yes, and it also says immediate living
 17 area.
 18 Q. Okay. So I just want to make sure, you
 19 don't see anything in here -- in this PBNDS, in this
 20 list of four tasks, that is followed by the word "by,"
 21 colon, you don't see anything in here that says
 22 anything about cleaning sinks, do you?
 23 A. Not right here, no.
 24 Q. Do you see it anywhere else in the PBNDS?
 25 A. No, but they have sinks in their housing

133

1 unit, in their cell.
 2 **Q. I didn't see it here. Do you see it**
 3 **here?**
 4 A. Not in that verbiage, no.
 5 **Q. And then do you see anything in here**
 6 **about cleaning phones?**
 7 A. No, but it's in their immediate living
 8 area.
 9 **Q. Okay. Do you see anything in here about**
 10 **cleaning chairs besides keeping, maybe, loose papers**
 11 **off of them?**
 12 A. They don't have separate chairs. The
 13 chairs are attached to the tables, but it's in the
 14 immediate living area.
 15 **Q. Which is in the common area?**
 16 A. In the immediate living area.
 17 **Q. Wait. Wait. Wait. The common area**
 18 **includes the immediate living area?**
 19 A. Yes.
 20 **Q. What is excluded from your definition of**
 21 **the immediate living area?**
 22 A. Anything outside of that pod.
 23 **Q. Huh. Okay. And then do you see anything**
 24 **in here, in the PBNDS at page 47, that says anything**
 25 **about cleaning tables?**

134

1 A. No, but it's in the immediate living
 2 area.
 3 **Q. Okay. So it's your testimony today that**
 4 **when ICE tells the contractors that detainees are**
 5 **responsible for personal housekeeping and can be**
 6 **forced to do those jobs -- they're not voluntary, they**
 7 **have to do them, right? It's your testimony today**
 8 **that when ICE tells its contractor that detainees are**
 9 **required to maintain their immediate living areas in a**
 10 **neat and orderly manner by: Making their bunk beds**
 11 **daily, stacking loose papers, keeping the floor free**
 12 **of debris and dividers free of clutter, and refraining**
 13 **from hanging things, that that means that GEO can**
 14 **require them to clean tables, chairs, phones, windows,**
 15 **and sinks?**
 16 A. In my opinion, that is included in
 17 immediate living area.
 18 **Q. To be very clear, I'm not asking for your**
 19 **opinion. I want GEO's corporate testimony. Is it the**
 20 **policy of GEO that this PBNDS list of four extends to**
 21 **forcing detainees to clean tables, chairs, phones,**
 22 **windows, and sinks?**
 23 A. Yes. All of those items that you just
 24 listed are in the immediate living area which falls
 25 under that.

135

1 **Q. So what if I want someone to paint the**
 2 **immediate living area and I am contending that a neat**
 3 **and orderly immediate living area should be well**
 4 **painted. Let's just --**
 5 A. Yes.
 6 **Q. Does the PBNDS say that that's one of the**
 7 **things detainees are required to do?**
 8 MS. FELTON: Object to form.
 9 A. That is something that we would have
 10 somebody apply for under the voluntary work program.
 11 **Q. (BY MR. FREE) I would like an answer to**
 12 **my question, though, which is: Does the PBNDS say**
 13 **that that's one of the things detainees are required**
 14 **to do?**
 15 A. No.
 16 **Q. So how is it that GEO gets to make that**
 17 **determination if GEO, as we said under the contract,**
 18 **is bound by the constraints of the PBNDS?**
 19 A. Because it says immediate living area.
 20 **Q. Okay. If I think that maintaining a neat**
 21 **and orderly immediate living area requires vacuuming**
 22 **the floor, am I allowed to compel detainees to vacuum**
 23 **the floor?**
 24 A. They don't vacuum the floor.
 25 **Q. I would like an answer to my question,**

136

1 **though. Am I allowed, under your interpretation of**
 2 **the PBNDS, GEO's interpretation, to compel detainees**
 3 **to vacuum the floor in their immediate living area?**
 4 A. Yes.
 5 **Q. If I think that having a clean -- excuse**
 6 **me -- a neat and orderly immediate living area**
 7 **involves disinfecting the entire common area after a**
 8 **meal with some sort of commercial cleaner, am I**
 9 **allowed, under GEO's interpretation of the PBNDS, to**
 10 **require detainees to do that?**
 11 MS. FELTON: Object to form.
 12 A. That would be -- yes, after the meals,
 13 that would be wiping off the tables.
 14 **Q. (BY MR. FREE) Okay. But that's not**
 15 **making their bunks daily, right?**
 16 A. No. It's not one of the fours, but it
 17 says to main their immediate living area.
 18 **Q. Why don't you like the word "by"? Why**
 19 **are we breaking down the --**
 20 MS. FELTON: Counsel, I'm going to start
 21 instructing her not to answer. Just because she's not
 22 giving you the answer that you want --
 23 MR. FREE: I'm actually very happy with
 24 these answers.
 25 MS. FELTON: So am I. You keep asking --

137

1 MR. FREE: What is your basis of
 2 instruction not to answer the question?
 3 MS. FELTON: You're badgering the
 4 witness. You've asked her the same question over and
 5 over again.
 6 MR. FREE: This is the first time I've
 7 asked why she doesn't like the word "by." I'm trying
 8 to understand why GEO doesn't believe that this list
 9 constrains it. And the word "by" followed by a colon
 10 is a part of this sentence. It seems that the only
 11 part of the sentence that your witness wants to focus
 12 on is immediate living areas. If your witness wants
 13 to leave the testimony where it is, that's fine with
 14 me. Okay. But I want to give her a full and fair
 15 opportunity to answer these questions.
 16 MS. FELTON: If you think you can answer
 17 his question, go ahead.
 18 **Q. (BY MR. FREE) So my question to you,**
 19 **just to make sure -- and I just want to know the**
 20 **answers. Okay. The word "by" followed by a colon has**
 21 **a list. It says making bunk beds daily, stacking**
 22 **loose papers, keeping the floor free of debris and**
 23 **dividers free of clutter, and then refraining from**
 24 **doing these things. Okay. That's how ICE has phrased**
 25 **this sentence. And you've sat here and told me that**

138

1 **GEO believes the company can require detainees to do a**
 2 **lot more than that. At least in the examples I've**
 3 **given, this sentence is not limited to the four things**
 4 **that come after the word "by" colon. What is the**
 5 **basis for that?**
 6 A. Because it says immediate living area.
 7 And I know I keep saying that, but that's what it is.
 8 And it may be hard for you to understand because
 9 you've never been to the facility to see what it looks
 10 like. But when you walk into a unit, that is their
 11 living area. I guess you would have to see it to
 12 understand what I'm saying.
 13 **Q. Well, I want my child to clean his room.**
 14 **Okay. But I don't want him to clean his room by**
 15 **getting out a wax floor stripper and, you know,**
 16 **operating a dangerous piece of machinery outside of my**
 17 **supervision. I want my child to clean his room. In**
 18 **fact, I'm able to require my child to clean his room**
 19 **by making his bunk bed, stacking the papers, keeping**
 20 **his floor clean, and not hanging stuff on the walls.**
 21 **Okay. If I have that stipulation and I'm stuck with**
 22 **that, then why is it fair to make my child do all of**
 23 **these other things, to do this wax floor stripping,**
 24 **all of these other things? What is the limiting**
 25 **principle here, I guess, is what I'm asking. What is**

139

1 **the limiting principle?**
 2 MS. FELTON: I'm going to object to form.
 3 MR. FREE: Fair.
 4 MS. FELTON: There's no waxing the
 5 floors.
 6 MR. FREE: Well, it's a hypothetical
 7 question anyway, so there's no anything. Let's back
 8 up.
 9 **Q. (BY MR. FREE) By your logic, GEO, what**
 10 **can't you require a detainee to do within an immediate**
 11 **living area?**
 12 MS. FELTON: Object to form.
 13 A. I really don't understand.
 14 **Q. (BY MR. FREE) What is it that GEO,**
 15 **according to your reading of the PBNDS, cannot require**
 16 **a detainee to do within the immediate living area?**
 17 A. I would say they're not going to be
 18 stripping the floor.
 19 **Q. Okay. Anything else?**
 20 A. Are you limiting this only to the ones
 21 that are on that list or --
 22 **Q. No.**
 23 A. -- what? Because then I'm not sure if
 24 you're asking under the voluntary work program which
 25 are the paid positions.

140

1 **Q. That's the whole point, right? Because**
 2 **work assignments are voluntary. You can have them do**
 3 **what you want within the limits?**
 4 A. Yes.
 5 **Q. But the personal housekeeping is a**
 6 **requirement. And you're telling me that you can**
 7 **require them to do a lot more than the things that are**
 8 **in this list in the name of personal housekeeping?**
 9 A. Right, like wiping down tables after meal
 10 service, yes.
 11 **Q. What is the legal basis of GEO's position**
 12 **there?**
 13 MS. FELTON: Object to form.
 14 A. I don't know.
 15 **Q. (BY MR. FREE) What is the factual basis**
 16 **of GEO's position there?**
 17 A. Based on what it says.
 18 **Q. And that's it?**
 19 A. Yes.
 20 **Q. Okay. Now, do GEO employees get training**
 21 **on the Performance-Based National Detention Standards?**
 22 A. Yes.
 23 **Q. Is the position you have just articulated**
 24 **to me uniformly applied within the Aurora facility?**
 25 A. Yes.

141

1 MS. FELTON: Object to form.
 2 A. Yes.
 3 **Q. (BY MR. FREE) The position that GEO can**
 4 **have detainees perform work as a requirement outside**
 5 **of these four itemized things, is that position**
 6 **uniformly followed at the Aurora facility?**
 7 A. If I understand you correctly, they are
 8 trained, yes, based off of the PBNDS to maintain their
 9 immediate living areas.
 10 **Q. Okay. Under your interpretation, GEO's**
 11 **interpretation, of immediate living areas, that**
 12 **includes the sanitation policies that cover the common**
 13 **area; is that right?**
 14 A. Yes.
 15 **Q. Okay. Thank you. So let's turn our**
 16 **attention then to pages 60 -- we'll start there -- 60**
 17 **and 61 in Tab 7. Do you recognize the document in**
 18 **front of you?**
 19 A. Yes.
 20 **Q. What is it?**
 21 A. It's a job description for a housing unit
 22 worker.
 23 **Q. And what job is this describing?**
 24 A. A housing unit trustee.
 25 **Q. Specifically what type of work is this**

142

1 **trustee going to do?**
 2 A. Items in the unit, what's listed here.
 3 **Q. So if you look at the top, would you**
 4 **agree this is the job description for dormitory**
 5 **sanitation worker?**
 6 A. Yes, which is equivalent to a housing
 7 unit.
 8 **Q. Okay. Who created this document?**
 9 A. I don't know.
 10 **Q. Is this document presented to detainees**
 11 **who want to work in the voluntary work program?**
 12 A. Yes. Once they are approved for a
 13 position, a particular position, then, yes, they will
 14 receive a job description.
 15 **Q. If you'll turn the page to 61 within**
 16 **Tab 7, do you recognize this document?**
 17 A. Yes.
 18 **Q. What is it?**
 19 A. It's the work application for detainees
 20 to fill out.
 21 **Q. What is the date of the request here?**
 22 A. July 15, 2014.
 23 **Q. Who presents this document to the**
 24 **detainee?**
 25 A. They can get them from their housing

143

1 unit.
 2 **Q. Do they get them from GEO?**
 3 A. Yes.
 4 **Q. And what's the purpose of this document?**
 5 A. This document is utilized to see what
 6 type of experience they have and what position that
 7 they would like to volunteer in.
 8 **Q. Okay. Do you see where this document**
 9 **says, "There are 40 paid positions in the work member**
 10 **detail program"?**
 11 A. Yes.
 12 **Q. Is that true?**
 13 A. There's more now.
 14 **Q. So the answer to my question is no?**
 15 A. No.
 16 **Q. It's not true?**
 17 MS. FELTON: Object to form.
 18 **Q. (BY MR. FREE) Okay. So this is a**
 19 **document that was created in 2014?**
 20 A. Yes.
 21 **Q. In 2014 --**
 22 A. Wait.
 23 **Q. Excuse me, not created. A document that**
 24 **was presented to Mr. Menocal and July 15 of 2014 was**
 25 **the date of the request?**

144

1 A. I don't know if it was presented to him
 2 or if he found one that was sitting around. I don't
 3 know. Sometimes forms have their way of -- ones that
 4 have been revised find their way around, so I
 5 couldn't tell you.
 6 **Q. Can we agree that the date of request**
 7 **field in this form says, "July 15, 2014"?**
 8 A. Yes.
 9 **Q. Can we agree that the date and time field**
 10 **at the bottom right-hand corner next to Mr. Menocal's**
 11 **signature is July 15, 2014?**
 12 A. Yes.
 13 **Q. Do you remember testifying a moment ago**
 14 **that during the period that is described in our notice**
 15 **of deposition, there was 60 to 70 participants in the**
 16 **voluntary work program per day?**
 17 A. Yes.
 18 **Q. Do you see here on this form where it**
 19 **says, "There are 40 paid positions"?**
 20 A. Yes.
 21 **Q. Which one is correct?**
 22 A. The one that I said earlier.
 23 **Q. So this form that was presented to**
 24 **Mr. Menocal is false?**
 25 A. I don't --

145

1 **Q. This piece of information on this form is**
 2 **false?**
 3 A. That's correct. And I don't know if this
 4 was presented to him or not.
 5 **Q. Well, he signed it?**
 6 A. He did sign it, but like I said, I don't
 7 know -- a lot of times they keep copies of things and
 8 it's an old form.
 9 **Q. Who keeps copies of things?**
 10 A. Detainees do.
 11 **Q. But this was produced by GEO?**
 12 A. Yes.
 13 **Q. Did you know that?**
 14 A. I do know that.
 15 **Q. So how would GEO have gotten a copy of a**
 16 **form that Mr. Menocal kept?**
 17 A. Because as forms are revised, a lot of
 18 times they are out there in space and people tend to
 19 find forms that have already been revised and continue
 20 using them.
 21 **Q. But the date of arrival for Mr. Menocal**
 22 **was June 6 of 2014, right?**
 23 A. That's what it says.
 24 **Q. So GEO accepted this form and, in fact,**
 25 **Mr. Menocal participated in the voluntary work**

146

1 **program?**
 2 A. Yeah. It's still a job application.
 3 **Q. All right. Do you see where it asks, "If**
 4 **all paid positions are filled, would you be interested**
 5 **in working on a voluntary basis"? Do you see that?**
 6 A. Yes.
 7 **Q. Under which program described in the**
 8 **PBNDS or in any other document is there any sort of**
 9 **authority or policy for GEO to run a second voluntary**
 10 **work program?**
 11 A. I don't understand your question.
 12 **Q. Well, you've said there are 40 paid**
 13 **positions, this was false, but you didn't -- it could**
 14 **have been an old form. And then you ask if he wants**
 15 **to work voluntarily and he says no. If he had said**
 16 **yes, where is the policy I can look to to see what the**
 17 **program he is working for is?**
 18 A. Just what we have in the contract and in
 19 the PBNDS. There's no set amount. So even if we went
 20 over and he was approved, which he was for a housing
 21 unit, he would still get paid.
 22 **Q. I don't know that that necessarily**
 23 **answers my question, or maybe I just don't understand**
 24 **your answer. I'm assuming for a moment that you don't**
 25 **have enough spots in the voluntary work program and**

147

1 **that he elects that he'll work for this -- he'll work**
 2 **voluntarily, he would be interested in working on a**
 3 **voluntary basis.**
 4 A. Okay.
 5 **Q. First of all, it's already voluntary,**
 6 **right, the work program has to be voluntary?**
 7 A. Yes.
 8 **Q. But really what you're saying is a**
 9 **voluntary unpaid basis? That's what this question is**
 10 **about.**
 11 A. Correct, such as a special detail.
 12 **Q. Okay. So there's a special detail that**
 13 **he could work for if he had said yes?**
 14 A. Yes.
 15 **Q. And you're telling me the place that I**
 16 **could find out how that's run, how it's administered,**
 17 **what standards govern it, that's either the contract**
 18 **or the PBNDS?**
 19 A. Correct.
 20 **Q. Okay. Look at page 62, please. What is**
 21 **this document?**
 22 A. This appears to be the second page of the
 23 work application.
 24 **Q. Do you see at the top where it says,**
 25 **"Detainee Voluntary Work Program Agreement"?**

148

1 A. Yes.
 2 **Q. And then at the bottom it says, "Work**
 3 **Detail Orientation"?**
 4 A. Yes.
 5 **Q. Do you see that? Okay. Is this a**
 6 **contract?**
 7 MS. FELTON: Object to form.
 8 **Q. (BY MR. FREE) As far as GEO's policy and**
 9 **practice, is this a contract?**
 10 MS. FELTON: Object to form.
 11 A. I would have to double-check, but I
 12 believe this came out of the PBNDS and was attached to
 13 the voluntary work program standard.
 14 **Q. (BY MR. FREE) Okay. In this form as it**
 15 **appears in this?**
 16 A. I would have to double-check, but I
 17 believe so.
 18 **Q. As far as GEO is concerned, does**
 19 **Mr. Menocal's signature on this form, page 62, create**
 20 **a contract between him and GEO?**
 21 MS. FELTON: Object to form.
 22 MR. FREE: What's the objection to form?
 23 MS. FELTON: That there are legal
 24 standards for -- legal elements for a contract and she
 25 does not have the background to be answering that.

149

1 MR. FREE: So it calls for a legal
 2 conclusion?
 3 MS. FELTON: Yes.
 4 MR. FREE: Thanks.
 5 **Q. (BY MR. FREE) In practice if Mr. Menocal**
 6 **had signed this form and been accepted to work in the**
 7 **voluntary work program and then someone decided they**
 8 **didn't want him in there anymore, could he take this**
 9 **form to his supervisor and say, hey, look, I'm**
 10 **entitled to work in the voluntary work program, in**
 11 **practice?**
 12 MS. FELTON: Object to form.
 13 A. I don't know.
 14 **Q. (BY MR. FREE) Okay. In terms of the**
 15 **practice and the policy of GEO, the fact that**
 16 **Mr. Menocal signed this document at 62, does that**
 17 **create any rights for him?**
 18 A. I don't know, but I don't see his
 19 signature on here.
 20 **Q. Fair enough. Let's assume he had signed**
 21 **it. Thank you very much for pointing that out. He**
 22 **didn't sign it, at least this one. Assume he signed**
 23 **it.**
 24 A. Okay.
 25 **Q. Would he have any greater rights than he**

150

1 **had the moment before he signed it according to GEO's**
 2 **practice?**
 3 A. I don't think so.
 4 **Q. Okay. It's GEO's position he's not an**
 5 **employee of GEO, right?**
 6 A. No, not at all.
 7 **Q. So it's not an employment contract as far**
 8 **as GEO's practice and the policy of the corporation;**
 9 **this detainee voluntary work program agreement doesn't**
 10 **make him GEO's employee, right?**
 11 A. No.
 12 **Q. Okay. Does it obligate GEO to continue**
 13 **to hold his spot in the voluntary work program?**
 14 A. I'm not sure I understand, because he can
 15 be removed.
 16 **Q. Right. He can be removed at any time,**
 17 **right?**
 18 A. Yes.
 19 **Q. And according to this form, this is form**
 20 **62 -- the form at page 62, No. 7 at the bottom, it**
 21 **says, "Work detail members will receive \$1.00 per work**
 22 **day. The maximum paid out will be \$1.00 per day." Is**
 23 **that right?**
 24 A. Yes.
 25 **Q. Okay. And he must sign the pay sheet on**

151

1 **the day the work is performed, right?**
 2 **(At this time Mr. Turner left the room.)**
 3 A. Yes.
 4 **Q. It says, "All work detail members serve**
 5 **at the pleasure of the facility and may be removed**
 6 **from their work status without prior notice or**
 7 **justification." That's sort of what we were talking**
 8 **about before, right?**
 9 A. Yes.
 10 **Q. I would like you to turn to page 70,**
 11 **please, within Tab 7. This is another document**
 12 **produced by GEO for another one of the plaintiffs in**
 13 **this case. It appears to me that this is the job**
 14 **description for a laundry sanitation worker. Is that**
 15 **how it looks to you?**
 16 A. Yes.
 17 **Q. Is this a document that would have been**
 18 **given to Agoberto Vizguerra, the person who signed it,**
 19 **upon his entry into the voluntary work program?**
 20 A. It's possible he received a copy. I
 21 don't know for sure.
 22 **Q. But GEO has a copy, right?**
 23 A. Yes. It would be in his detention file.
 24 **Q. Excuse me. It's Dagoberto, but thank**
 25 **you. This explains all of the things that Dagoberto**

152

1 **is going to do as part of his work in the voluntary**
 2 **work program as a laundry sanitation worker; is that**
 3 **right?**
 4 A. Yes.
 5 **Q. I'm now looking at page 80. Do you**
 6 **recognize that document?**
 7 A. It's another job description.
 8 **Q. For what type of job?**
 9 A. Facility cleanup worker.
 10 **Q. And would you agree that it summarizes**
 11 **the duties and responsibilities that the facility**
 12 **cleanup worker needs to perform as part of the**
 13 **voluntary work program?**
 14 **(At this time Mr. Turner entered the**
 15 **room.)**
 16 A. Yes.
 17 **Q. Okay. And if you would turn to page 105,**
 18 **please, do you recognize that document?**
 19 A. Yes. It's a job description for a
 20 library worker.
 21 **Q. It's a library sanitation worker --**
 22 A. Yes.
 23 **Q. -- is that right? This is the summary of**
 24 **what Mr. Hugo, another one of our clients, Hugo**
 25 **Hernandez, is going to have to do as part of his**

153	<p>1 participation in the voluntary work program; is that</p> <p>2 right?</p> <p>3 A. Yes.</p> <p>4 Q. And then if you'll turn to page 120,</p> <p>5 please, do you recognize this document?</p> <p>6 A. Yes. It's for a medical sanitation</p> <p>7 worker.</p> <p>8 Q. And I believe this was for Ms. Argueta.</p> <p>9 This is a summary of the tasks that she's going to</p> <p>10 have to perform as part of her participation in the</p> <p>11 voluntary work program, right?</p> <p>12 A. Yes.</p> <p>13 Q. As part of its administration of the</p> <p>14 voluntary work program, GEO provides the documents</p> <p>15 that we've just gone over, the job description, the</p> <p>16 job application, the agreement, to every participant;</p> <p>17 is that right?</p> <p>18 A. Yes, as well as the training.</p> <p>19 Q. As well as the training. Okay. And I</p> <p>20 just want to go back at page 135. It seems like -- do</p> <p>21 you recognize this document?</p> <p>22 A. Yes. It's a different typed version of</p> <p>23 what we just discussed earlier of a program agreement.</p> <p>24 Q. Okay. So is this what you mean when you</p> <p>25 say there are different versions floating around out</p>	155	<p>1 in the contract or with the PBNDS; is that what you</p> <p>2 said?</p> <p>3 A. Could you repeat that?</p> <p>4 Q. I believe you told me a moment ago that</p> <p>5 the detainee voluntary work program agreement either</p> <p>6 came accompanying the ICE contract or it was part of</p> <p>7 the Performance-Based National Detention Standard; is</p> <p>8 that correct?</p> <p>9 A. Yes. I believe it was attached to either</p> <p>10 the 2008 or the 2011.</p> <p>11 Q. Okay. I'm now going to hand you what</p> <p>12 we'll mark as Exhibit 7.</p> <p>13 (Deposition Exhibit 7 was marked.)</p> <p>14 Q. We'll put it into Tab 19. Take a moment</p> <p>15 and review that document and let me know when you're</p> <p>16 ready to answer some questions about it, please.</p> <p>17 A. I'm ready.</p> <p>18 Q. Is this the type of attachment that</p> <p>19 you're talking about when you say it was attached to</p> <p>20 the contract?</p> <p>21 A. Yes, similar, but it doesn't look the</p> <p>22 same.</p> <p>23 Q. No, it doesn't, does it? Do you have any</p> <p>24 idea who would have modified this document?</p> <p>25 A. No.</p>
154	<p>1 there?</p> <p>2 A. Yes.</p> <p>3 Q. So if we compared that to, say, the</p> <p>4 document at 133, two pages back, they're the same in</p> <p>5 substance but different in form, right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I notice the document at 133,</p> <p>8 another detainee voluntary work program agreement, has</p> <p>9 at the bottom left-hand corner, Revised 9/12. Do you</p> <p>10 see that?</p> <p>11 A. Yes.</p> <p>12 Q. What does that mean?</p> <p>13 A. It was revised in September 2012.</p> <p>14 Q. Any idea who may have revised it?</p> <p>15 A. No.</p> <p>16 Q. And then if you'll turn to 137, do you</p> <p>17 recognize this document?</p> <p>18 A. Yes. It's another job description for a</p> <p>19 facility cleanup worker and then it says, "Floors" at</p> <p>20 the top.</p> <p>21 Q. Somebody struck through the "Cleanup" and</p> <p>22 handwrote the word "Floors"?</p> <p>23 A. Yes.</p> <p>24 Q. Now, I believe you told me that the</p> <p>25 detainee voluntary work program agreement either came</p>	156	<p>1 (At this time Mr. Turner left the room.)</p> <p>2 Q. Do you have any explanation for why this</p> <p>3 is the document -- and I'll proffer to you this was</p> <p>4 the document that was provided in a Freedom of</p> <p>5 Information Act request by U.S. Immigration and</p> <p>6 Customs Enforcement as Attachment 6 to the contract.</p> <p>7 You can see, at the bottom right-hand corner, there's</p> <p>8 the number of the FOIA request, F-O-I-A. This is the</p> <p>9 document that appears to be a template for the</p> <p>10 voluntary work program agreement. Do you have any</p> <p>11 explanation for why this doesn't line up with what we</p> <p>12 looked at in the previous documents that were being</p> <p>13 provided to GEO detainees?</p> <p>14 MS. FELTON: Object to form.</p> <p>15 A. No, but I don't know which standards this</p> <p>16 came out of either. There's been two different sets.</p> <p>17 Q. (BY MR. FREE) Do you see at the top</p> <p>18 where it says, "Insert Facility Name"?</p> <p>19 A. Yes.</p> <p>20 Q. Who do you think is responsible for</p> <p>21 inserting the facility name?</p> <p>22 MS. FELTON: Object to form.</p> <p>23 A. I have no idea.</p> <p>24 (At this time Mr. Turner entered the</p> <p>25 room.)</p>

157

1 **Q. (BY MR. FREE) Okay. Now, if you go back**
 2 **to, for instance, document No. -- just as an exemplar,**
 3 **document No. 90, exemplar document No. 90, at the top**
 4 **it does have The GEO Group, Inc./Aurora Ice Processing**
 5 **Center. Do you see that?**
 6 A. Yes.
 7 **Q. So the facility name has been inserted.**
 8 **Do you see that?**
 9 MS. FELTON: Object to form.
 10 **Q. (BY MR. FREE) The facility name -- I'll**
 11 **rephrase my question. The facility name is on this**
 12 **document?**
 13 A. Yes.
 14 **Q. Okay. Whereas, in this attachment to an**
 15 **ICE contract, it's not. Do you see that?**
 16 A. I see it.
 17 **Q. Okay. And you agree that here this is**
 18 **unique to the Aurora facility, The GEO Group; this**
 19 **document is specific to the Aurora facility?**
 20 A. I don't know for sure.
 21 **Q. Okay. Do you think that any other GEO**
 22 **facility would be using a voluntary work program**
 23 **agreement with that second line at the top that says,**
 24 **"The GEO Group, Inc./Aurora ICE Processing Center"?**
 25 A. No.

158

1 **Q. Okay. So this document has been created**
 2 **by someone for the GEO facility in Aurora. Can we**
 3 **agree on that?**
 4 A. Without going back and checking even with
 5 like the 2008, I would want to make sure and verify
 6 that none of this was as an attachment.
 7 **Q. Okay.**
 8 A. Because I don't know.
 9 **Q. Okay. When you say "this," you were**
 10 **pointing to the work detail orientation section at the**
 11 **bottom half of the sheet and 1 through 8 below; is**
 12 **that right?**
 13 A. Correct.
 14 **Q. Are there any other documents that need**
 15 **to be signed to participate in the voluntary work**
 16 **program with the exception of the training and safety**
 17 **documents?**
 18 A. No. I believe we looked at all of them.
 19 **Q. I thought so too. All right. Now I**
 20 **would like to turn your attention briefly to Tab 9.**
 21 **This is going to marked as Exhibit 8 to today's**
 22 **deposition.**
 23 **(Deposition Exhibit 8 was marked.)**
 24 **Q. Do you see this document? The tab**
 25 **contains several versions of the policy and we're**

159

1 **going to walk through them. I would like you to start**
 2 **at the beginning of Tab 9, which is GEO 1395. Do you**
 3 **see that?**
 4 A. Yes.
 5 **Q. What is this document?**
 6 A. This is a site-specific policy titled
 7 "Detainee Work Plan."
 8 **Q. Whose signature appears at the top of it?**
 9 A. That is the ICE COTAR.
 10 **Q. Who is on the right-hand side of it, the**
 11 **signature under "Approved By"?**
 12 A. The facility warden.
 13 **Q. Who is that?**
 14 A. Pardon me?
 15 **Q. Who is that?**
 16 A. John Choate, C-h-o-a-t-e.
 17 **Q. And this is policy 8.1.8-AUR, right?**
 18 A. Yes.
 19 **Q. I'm going to call this 8.1.8, if that's**
 20 **okay with you, because it's shorter.**
 21 A. Okay.
 22 **Q. Okay. Do you see under C where it says,**
 23 **"Detainees are required to maintain their immediate**
 24 **living areas in a neat and orderly manner"?**
 25 A. Yes.

160

1 **Q. And then the next page, if you turn it,**
 2 **instead of doing it in list form, it does it in**
 3 **sentence form and it parrots back the 1 through 4 of**
 4 **the PBNDS. Do you see that?**
 5 A. Okay. Yes.
 6 **Q. That's under the section titled "Required**
 7 **Work Assignments."**
 8 A. Yes. But it also says, "Detainees are
 9 not required to work except to do personal
 10 housekeeping and to clean their housing area."
 11 **Q. So is it your testimony that "and to**
 12 **clean their housing area" is broader than the personal**
 13 **chores?**
 14 A. Yes, reverting back to our earlier
 15 conversation.
 16 **Q. Okay. The part about cleaning their**
 17 **housing area doesn't appear anywhere verbatim in the**
 18 **PBNDS, does it?**
 19 A. I would have to look through all of the
 20 PBNDS.
 21 **Q. Let's be clear. 8.1.8 is the detainee**
 22 **voluntary work program/detainee work plan policy for**
 23 **GEO?**
 24 A. Yes.
 25 **Q. It should be keyed directly to PBNDS 5.8,**

161	<p>1 the voluntary work program PBNDS, right?</p> <p>2 A. Yes.</p> <p>3 Q. You have to follow that. And when we</p> <p>4 were looking at 5.8, I didn't see anything that says,</p> <p>5 "and to clean their housing area," did you?</p> <p>6 A. Just what we discussed earlier in the</p> <p>7 PBNDS.</p> <p>8 Q. So the words that aren't there, but</p> <p>9 you're reading into it from the phrase "immediate</p> <p>10 living areas"?</p> <p>11 A. Immediate living area, yes.</p> <p>12 Q. We're on the same page. You said earlier</p> <p>13 that there could be like a voluntary special detail</p> <p>14 and that is a situation where a person can't get into</p> <p>15 the voluntary work program but still wants to work for</p> <p>16 no money. Did I understand that correctly?</p> <p>17 A. There's special detail. However, usually</p> <p>18 we pay for those and that's covered under the PBNDS as</p> <p>19 well.</p> <p>20 Q. Where?</p> <p>21 A. In the voluntary work program.</p> <p>22 Q. Okay. Let me find it. So the PBNDS is</p> <p>23 at Tab 7.</p> <p>24 A. It's 48, Tab 7.</p> <p>25 Q. Show me where you're looking. "Special</p>	163	<p>1 mixes. It's just extra stuff.</p> <p>2 Q. Why do you do that?</p> <p>3 A. Because we do. We give them Xboxes. We</p> <p>4 give them a lot of things that we don't have to do.</p> <p>5 Q. When they are in the voluntary work</p> <p>6 program?</p> <p>7 A. Yes.</p> <p>8 Q. Huh.</p> <p>9 A. Well, the whole population gets the</p> <p>10 Xboxes and some of the other stuff, but the workers,</p> <p>11 we do.</p> <p>12 Q. What do the workers get, other than the</p> <p>13 goody bags, that the other people don't get?</p> <p>14 A. Sometimes they do get them. We actually</p> <p>15 give ice cream and cookies and stuff once a week on</p> <p>16 those that have the cleanest units.</p> <p>17 Q. I'm just talking about the voluntary work</p> <p>18 program participants versus the detainees who are not</p> <p>19 participants in the voluntary work program.</p> <p>20 A. But some of those that do clean, like the</p> <p>21 housing unit people, they are included with that, so</p> <p>22 like they would get the ice cream and stuff too.</p> <p>23 Q. What housing unit people?</p> <p>24 A. The trustees under the voluntary work</p> <p>25 program.</p>
162	<p>1 Details." Okay. That doesn't -- when you say,</p> <p>2 "Detainees may volunteer for temporary work details</p> <p>3 that occasionally arise. The work, which generally</p> <p>4 lasts from several hours to several days may involve</p> <p>5 labor-intensive work," what you're saying is that this</p> <p>6 policy tracks with this part of the PBNDS?</p> <p>7 A. I'm not sure I understand.</p> <p>8 Q. 8.1.8, the language in 8.1.8.</p> <p>9 A. Under D.</p> <p>10 Q. Yes.</p> <p>11 A. Yes.</p> <p>12 Q. It tracks part E of the PBNDS?</p> <p>13 A. Yes.</p> <p>14 Q. Great. Okay. And that's at 48. Are</p> <p>15 people paid for the special details?</p> <p>16 A. Yes. We also give them goody bags.</p> <p>17 Q. Like what?</p> <p>18 A. We give all trustees goody bags.</p> <p>19 Q. And by "trustees," you mean someone who</p> <p>20 has applied for and been accepted to the PBNDS or a</p> <p>21 person who is doing a special detail or what do you</p> <p>22 mean?</p> <p>23 A. Yes.</p> <p>24 Q. Yes. Okay. What's in a goody bag?</p> <p>25 A. They get bags of chips, candy bars, drink</p>	164	<p>1 Q. Okay. So who doesn't get the ice cream?</p> <p>2 A. The ones that don't like have good</p> <p>3 sanitation in their cells, in the common areas.</p> <p>4 Q. Okay. Do you see page 1397?</p> <p>5 A. Yes.</p> <p>6 Q. Would you agree that it lists a number of</p> <p>7 general work assignments and times?</p> <p>8 A. Yes.</p> <p>9 Q. Would you agree that it doesn't list the</p> <p>10 number of workers; is that right?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. So can you, without mathematical</p> <p>13 precision, just estimate how many people are in each</p> <p>14 of these eight categories on any given day in the</p> <p>15 voluntary work program? We'll just call it a weekday.</p> <p>16 A. Off the top of my head, I don't know.</p> <p>17 Some of these, like food service, I don't know for</p> <p>18 sure. Living area, usually it's maybe two for each</p> <p>19 unit.</p> <p>20 Q. And then you have area cleaning for</p> <p>21 inside the facility and that's three shifts. You have</p> <p>22 area cleaning outside the facility, that's just one</p> <p>23 shift. You have evening workers, building janitorial,</p> <p>24 that looks like from 3:30 to 8:30. Do you see that?</p> <p>25 A. Yes.</p>

165

1 **Q. And then you have maintenance from 9:30**
 2 **to 2:30. Do you see that?**
 3 A. Yes.
 4 **Q. Laundry, that's one shift. Then you have**
 5 **the barber, which is two shifts, really, one shift and**
 6 **then there's one that varies on time Saturday and**
 7 **Sunday. Do you see that?**
 8 A. Yes.
 9 **Q. When you described 60 to 70 participants**
 10 **in the voluntary work program, they're doing these**
 11 **jobs; is that right?**
 12 A. Some of these, yes.
 13 **Q. What other jobs are they doing?**
 14 A. Library.
 15 **Q. Okay. What else?**
 16 A. That's about it. That pretty much covers
 17 it, but these are general work assignments.
 18 **Q. What about medical?**
 19 A. Medical is not all of the time.
 20 **Q. Okay.**
 21 A. But they don't work all of those hours
 22 either.
 23 **Q. I'm now going to turn your attention to**
 24 **1400 in the same tab.**
 25 A. Okay.

166

1 **Q. What is this document?**
 2 A. This is site-specific policy 8.1.8-AUR
 3 titled "ICE Detainee Work Plan."
 4 **Q. Is the difference between this document**
 5 **and the one we were looking at that it has been put**
 6 **into effect later in time, so it was effective more**
 7 **recently?**
 8 A. I would assume it was from the annual
 9 review.
 10 **Q. Okay. But it's more recent than the**
 11 **first one we looked at?**
 12 A. Yes.
 13 **Q. Okay. Similarly, the rest of the**
 14 **documents in Tab 9 comprise the detainee voluntary**
 15 **work program local policies, site-specific policies,**
 16 **going up to page 1415, which is a sanitation policy;**
 17 **is that correct?**
 18 A. Yes.
 19 **Q. All right. Now, 1415, again, you have --**
 20 **well, why don't you tell me what this document is.**
 21 A. 1415?
 22 **Q. Yes, ma'am.**
 23 A. It's site-specific policy 12.1.4-AUR
 24 titled "Sanitation Procedures."
 25 **Q. Okay. And it appears to be a policy that**

167

1 **was revised in 2011. Do you see that in the top**
 2 **right-hand corner, 1415?**
 3 A. Yes.
 4 **Q. Do you see the Section B, Detainee**
 5 **Sanitation Responsibilities?**
 6 A. Yes.
 7 **Q. It says, "Each detainee will be**
 8 **responsible for the cleanliness of his or her cell or**
 9 **living area, including walls, floors, sink, toilet,**
 10 **windows, and other property within the cell, room, or**
 11 **living area." Do you see that?**
 12 A. Yes.
 13 **Q. And this sets forth what we were talking**
 14 **about earlier, the sanitation responsibilities, right?**
 15 A. Yes.
 16 **Q. It says "each detainee," right?**
 17 A. Yes.
 18 **Q. It doesn't say anything about immediate**
 19 **living area, does it?**
 20 A. Not in this policy.
 21 **Q. Okay. Because this policy encompasses**
 22 **more things that are in the PBNDS; is that right?**
 23 MS. FELTON: Object to form.
 24 **Q. (BY MR. FREE) More tasks, in other**
 25 **words?**

168

1 A. I wouldn't necessarily agree with that.
 2 **Q. There's a list of four things in the**
 3 **PBNDS, four types of things. We went over it pretty**
 4 **thoroughly earlier. Sinks, toilets, windows, and**
 5 **other property not included, right?**
 6 A. Yes.
 7 **Q. Okay. Now, as we were looking at the job**
 8 **descriptions of people performing work in the**
 9 **voluntary work program and looking at the list of**
 10 **people who are -- the types of workers that GEO is**
 11 **employing -- not employing but using to perform these**
 12 **tasks, I want you to think back to the staffing plan**
 13 **that I asked you about earlier. Okay?**
 14 A. Yes.
 15 **Q. Does GEO's staffing plan for the Aurora**
 16 **facility include kitchen workers?**
 17 A. Detention officers.
 18 **Q. I don't understand your answer.**
 19 A. There are detention officers that work in
 20 the kitchen, just like a detention officer would work
 21 in a housing unit.
 22 **Q. Okay. So there are kitchen workers**
 23 **contemplated in GEO's staffing plan; is that right?**
 24 A. Classified as detention officers, yes.
 25 **Q. They work in the kitchen?**

169

1 A. Yes.

2 **Q. How many?**

3 A. I don't know.

4 **Q. Does GEO have a librarian?**

5 A. No. They have a detention officer that

6 is assigned to the library.

7 **Q. How much is that detention officer paid?**

8 A. I would have to look in the wage

9 determination.

10 **Q. Let's look for it. Why don't you just**

11 **put this pen right there at 1400. Just so I'm clear**

12 **before we do all of this, I'm asking about people who**

13 **actually do work in the kitchen. I'm not asking about**

14 **people who guard the people who are in the kitchen.**

15 **Do you understand the distinction?**

16 A. The staff that work in our kitchen are

17 detention officers.

18 **Q. They're classified as detention officers**

19 **under the staffing plan. They're cooking meals,**

20 **right, or supervising cooking the meals?**

21 A. Yes.

22 **Q. They're not standing guard while the**

23 **detainees cook the meals. They're actually cooking**

24 **the meals, is that right, or are they standing guard**

25 **while the detainees cook meals?**

170

1 A. It's both.

2 **Q. Okay.**

3 A. They're assisting and supervising.

4 **Q. All right. And did you tell me you**

5 **didn't know how many there are?**

6 A. No. I would want to look at the staffing

7 plan. I don't know off the top of my head.

8 **Q. All right. Let's look at page 37 in**

9 **Tab 7.**

10 A. Tab 7, what?

11 **Q. Yes, ma'am, page 37. We're just going to**

12 **flip back and forth between 37 and 1400 for a little**

13 **while.**

14 A. Okay. Go ahead.

15 **Q. Food preparation, which is code 7,000,**

16 **and service occupations, you have cook. Would you**

17 **agree the cook makes 13.06 an hour?**

18 A. You're talking about the detention

19 officer?

20 **Q. No. I'm talking about if you were to pay**

21 **someone to do what that detention officer is doing in**

22 **the kitchen, cooking things --**

23 A. Yes.

24 **Q. -- and you were going to pay them under**

25 **this wage determination that's attached to GEO's**

171

1 **contract with ICE, that person -- I don't care what**

2 **you call them -- if they're doing that job, they're**

3 **going to be getting paid 13.06 an hour for cook I,**

4 **that's 7041?**

5 A. They're all classified as a detention

6 officer.

7 **Q. Okay. So you would have to pay them as a**

8 **detention officer?**

9 A. That is what their classification is.

10 **Q. All right. So for the corrections**

11 **officers, is that the closest thing you can think of**

12 **to a detention officer?**

13 A. No. It's detention officer, 27040.

14 Right below corrections officer.

15 **Q. What does that person make an hour?**

16 A. 24.05.

17 **Q. I don't know that that's right. Draw a**

18 **line underneath. I have 24.05. I do know that that's**

19 **right. Good. So they make 24 bucks an hour if you're**

20 **paying them as a detention officer; is that right?**

21 A. They are a detention officer.

22 **Q. Are they making \$24 an hour?**

23 A. Yes.

24 **Q. For working in the kitchen?**

25 A. As a detention officer, yes.

172

1 **Q. Okay. Same for a barber, in other words,**

2 **if we looked at -- would you agree if we looked at the**

3 **barber, a janitor, a maintenance worker, a laundry**

4 **worker, it's GEO's position we should be looking at**

5 **the detention officer code to determine the value of**

6 **those services rather than the actually functional**

7 **position that they're doing; is that right?**

8 MS. FELTON: Object to form.

9 A. I don't understand what you're saying.

10 **Q. (BY MR. FREE) Well, I'm try to figure**

11 **out the -- go ahead.**

12 A. Go ahead.

13 **Q. I'm trying to figure out the value of**

14 **this work that the detainees are doing in the kitchen,**

15 **because we're focusing on that as a starting point.**

16 A. Okay.

17 **Q. You're telling me, well, they're not**

18 **cooks. They're detention officers. That's what you**

19 **pay people who are getting paid pursuant to this**

20 **contract?**

21 A. That is what they're classified as, yes.

22 **Q. That's fine. We'll classify them as**

23 **detention officers. You're telling me for every**

24 **single one of those jobs, the librarian, the barber,**

25 **the maintenance worker, the laundry worker, instead of**

173	<p>1 looking at maintenance, you're going to look at</p> <p>2 detention officer to determine the value of the</p> <p>3 services that the detainees are providing?</p> <p>4 MS. FELTON: Object to form.</p> <p>5 A. They are a detention officer</p> <p>6 classification.</p> <p>7 Q. (BY MR. FREE) Okay. Functionally</p> <p>8 speaking, what do they do that's different from a</p> <p>9 detention officer who is in the pod looking at</p> <p>10 detainees?</p> <p>11 A. I don't follow.</p> <p>12 Q. Functionally speaking, a detention</p> <p>13 officer in the kitchen does different tasks than a</p> <p>14 detention officer who is in the housing unit, right?</p> <p>15 A. Not necessarily, because they are still</p> <p>16 doing -- they're supervising, they are still doing</p> <p>17 their checks on the detainees ensuring that everything</p> <p>18 is okay.</p> <p>19 Q. Imagine a Venn diagram and on one side of</p> <p>20 the Venn diagram is detention officers in the kitchen,</p> <p>21 on the other side of the Venn diagram is detention</p> <p>22 officers in the pods. I understand your testimony to</p> <p>23 be that in the middle of the Venn diagram, they're</p> <p>24 doing their checks, they're performing some similar</p> <p>25 functions, they're supervising the detainees, they're</p>	175	<p>1 MR. FREE: All right. In order to use</p> <p>2 the remaining time that we have and keep my promise to</p> <p>3 get you out of here when I said I would, I'm going to</p> <p>4 take a five-minute break and we'll come back in five</p> <p>5 minutes at 2:36 p.m. Okay. Thanks. We'll go off the</p> <p>6 record.</p> <p>7 (Recess taken, 2:34 p.m. to 2:40 p.m.)</p> <p>8 MR. FREE: We are going to go back on the</p> <p>9 record at 2:37 p.m. I think we're in the homestretch.</p> <p>10 Q. (BY MR. FREE) If you are a participant</p> <p>11 in the voluntary work program, are you exempted from</p> <p>12 selection for the job duties of the housing unit</p> <p>13 sanitation program?</p> <p>14 A. That, I don't know.</p> <p>15 Q. How would you find that out?</p> <p>16 A. I could ask. I don't know if that's a</p> <p>17 practice that they're doing or not.</p> <p>18 Q. Whom would you ask?</p> <p>19 A. I could ask my chief of security. I</p> <p>20 could ask officers. I just want to make sure I give</p> <p>21 you the right answer.</p> <p>22 Q. I appreciate that. Since you're speaking</p> <p>23 on behalf of GEO, I think we would like that too.</p> <p>24 Do you have any idea whether there's any</p> <p>25 sort of written policy on that?</p>
174	<p>1 maintaining security, right? That's what I understand</p> <p>2 so far.</p> <p>3 A. Correct. So if you look at the</p> <p>4 definition that is tagged on to that classification as</p> <p>5 detention officer through the Department of Labor, you</p> <p>6 would see the exact definition that, I guess, I'm</p> <p>7 trying to relay to you.</p> <p>8 Q. Thank you. That makes sense. So that</p> <p>9 will be under the code that's listed here?</p> <p>10 A. Yes.</p> <p>11 Q. But the people in the pod are not</p> <p>12 cooking; the detention officers who work in the pod</p> <p>13 are not cooking, right?</p> <p>14 A. No. They cook their own meals, though.</p> <p>15 Q. The answer to my question is, no, they're</p> <p>16 not cooking?</p> <p>17 A. No, not in the sense of working in the</p> <p>18 kitchen.</p> <p>19 Q. They're not cutting anybody's hair,</p> <p>20 right?</p> <p>21 A. Not at the -- no, not like they do at the</p> <p>22 barbershop, but they shave each other's heads.</p> <p>23 Q. The detention officers shave each other's</p> <p>24 heads?</p> <p>25 A. No, the detainees.</p>	176	<p>1 A. No.</p> <p>2 Q. You don't know or there is not?</p> <p>3 A. No, not to my knowledge.</p> <p>4 Q. There's not, to your knowledge --</p> <p>5 A. Correct.</p> <p>6 Q. -- any written policy on being exempt</p> <p>7 from the sanitation policy? Okay. Can you</p> <p>8 ballpark -- I know you said there was high turnover</p> <p>9 within the voluntary work program earlier. Did I get</p> <p>10 that right?</p> <p>11 A. There's a high turnover rate at the</p> <p>12 facility, period, because the stay is very short, the</p> <p>13 average length of stay of a detainee.</p> <p>14 Q. How long is the stay?</p> <p>15 A. Around, maybe, 35 days.</p> <p>16 Q. Okay. So that high turnover by necessity</p> <p>17 affects the voluntary work program and the turnover</p> <p>18 there, right?</p> <p>19 A. No, not necessarily.</p> <p>20 Q. Well, if the average length of stay in</p> <p>21 the facility is 35 days, is the average turnover in</p> <p>22 the voluntary work program like faster or slower?</p> <p>23 A. I mean, there's turnover, but there's</p> <p>24 always applications waiting in the wings for somebody</p> <p>25 that wants to work.</p>

177

1 **Q. You have people stacked up ready to go?**
 2 A. Yes.
 3 **Q. Ballpark, how many people a year would**
 4 **you say work in the dollar-a-day program --**
 5 MS. FELTON: Object to form.
 6 **Q. (BY MR. FREE) -- in the voluntary work**
 7 **program?**
 8 A. I have no idea.
 9 **Q. I would like to show you a document that**
 10 **we will mark as Exhibit 9 and that will be at Tab 11**
 11 **of your binder.**
 12 (Deposition Exhibit 9 was marked.)
 13 **Q. Now, I am not asking you about the total**
 14 **compensation paid to the voluntary work program**
 15 **participants, but what I'm going to ask you about**
 16 **based on this document is -- first of all, do you**
 17 **recognize this document?**
 18 A. I've seen it once or twice. I'm not very
 19 familiar with it.
 20 **Q. Do you have any idea what it is?**
 21 A. It says it's a billing for housing and
 22 man-days.
 23 **Q. Do you see the number 1,680 there?**
 24 A. Yes.
 25 **Q. Is it your understanding that based on**

178

1 **the dollar rate that this bills the government for**
 2 **1,680 man-days during the month of November -- excuse**
 3 **me -- December -- yes, November 2012?**
 4 A. I don't know. I can't answer that. I've
 5 never prepared one of these. I don't know.
 6 **Q. Okay. If you would turn to page 1612, do**
 7 **you see the column that says, "Detainees Worked" that**
 8 **corresponds with the column listing the dates in**
 9 **November?**
 10 A. Yes.
 11 **Q. And you see a separate column that says,**
 12 **"Detainees Paid"?**
 13 A. Yes.
 14 **Q. You see the total is 1,680?**
 15 A. Yes.
 16 **Q. This is November of 2012 based on the**
 17 **month identified at the top?**
 18 A. Okay.
 19 **Q. Do you see that?**
 20 A. Yes.
 21 **Q. Does this indicate to you that during the**
 22 **month of November 2012, between 53 and 72 detainees**
 23 **worked on any given day?**
 24 A. Yes, that's what it says.
 25 **Q. So there was a total of 1680 man-hours**

179

1 **or -- excuse me -- shifts worked by detainees at the**
 2 **Aurora facility during that month?**
 3 MS. FELTON: Object to form.
 4 **Q. (BY MR. FREE) In the voluntary work**
 5 **program?**
 6 A. I don't know if the 1680 is a total of
 7 all of that. I don't know.
 8 **Q. Okay. Based on what you told me before,**
 9 **about a 35-day turnover, would you say that these**
 10 **detainees would -- this pool of detainees would remain**
 11 **constant from November 1 to November 27, or is it the**
 12 **case that there might be some new people coming into**
 13 **the voluntary work program because others have left or**
 14 **been deported?**
 15 A. Yes. That's a very good possibility.
 16 **Q. The second part, right?**
 17 A. Yes.
 18 **Q. If there were 1680 shifts worked by the**
 19 **voluntary work program detainees, those would not**
 20 **necessarily encompass the same 53 to 72 detainees**
 21 **because of turnover, right?**
 22 A. I don't understand.
 23 **Q. You've got between 53 and 72 -- 51 --**
 24 **excuse me -- and 75 people working under the**
 25 **"Detainees Worked" --**

180

1 A. Yes.
 2 **Q. -- for each day in November, right?**
 3 A. Yes.
 4 **Q. Those are not necessarily going to be the**
 5 **same people because of turnover?**
 6 A. Correct.
 7 **Q. Okay. And that is going to multiply**
 8 **month by month as the turnover continues on that**
 9 **35-day average cycle, right?**
 10 A. It could change daily. Every day could
 11 be different.
 12 **Q. So more people are going to be in the**
 13 **program as time goes on, not in terms of positions but**
 14 **in terms of people who have actually participated in**
 15 **the voluntary work program, more of them -- the number**
 16 **is going to increase, right?**
 17 A. Not all of the time. I mean, the numbers
 18 fluctuate, but we have releases and then we get new
 19 book-ins, so it just depends.
 20 **Q. All right. Do you think it's safe to say**
 21 **that during the course of a year, several hundred**
 22 **detainees participate in the voluntary work program at**
 23 **Aurora?**
 24 A. I don't know the number. I don't even
 25 want to give a guess, because I don't know.

181	<p>1 Q. Okay. Where would I look to find out?</p> <p>2 A. I guess these numbers would tell you.</p> <p>3 Q. By "these numbers," you're pointing to</p> <p>4 the pages that we've just been discussing?</p> <p>5 A. 1612.</p> <p>6 Q. 1612. Okay. If we wanted to know how</p> <p>7 many shifts have been worked and then reverse engineer</p> <p>8 it by, maybe, turnover, that's where we would look, is</p> <p>9 the number of shifts worked per month; is that right?</p> <p>10 MS. FELTON: Object to form.</p> <p>11 A. I guess whatever the business office puts</p> <p>12 together.</p> <p>13 Q. (BY MR. FREE) Okay. What did you do to</p> <p>14 prepare to provide knowledgeable information and</p> <p>15 testimony on topic 3 b, which is the number of</p> <p>16 participants in the voluntary work program and any</p> <p>17 documents that we might look to to find that, so if</p> <p>18 you look back to Exhibit 1. Again, I don't want to</p> <p>19 know anything your lawyer told you.</p> <p>20 A. It was which one?</p> <p>21 Q. 3 b. It's on page 3.</p> <p>22 A. Based on my personal knowledge and I also</p> <p>23 met with Ms. Felton.</p> <p>24 Q. So what, based on your personal</p> <p>25 knowledge, did you do before you came in here to</p>	183	<p>1 November 2, who were in the voluntary work program,</p> <p>2 right, we have their names?</p> <p>3 A. Okay.</p> <p>4 Q. Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. We know that those individuals totaled</p> <p>7 60, because we look at the second page and we can</p> <p>8 see --</p> <p>9 A. Yes.</p> <p>10 Q. -- right? Okay. And this appears to be</p> <p>11 a batch summary printed out from a computer, right?</p> <p>12 A. Yes, that's what it says.</p> <p>13 MR. FREE: Okay. To counsel, did you</p> <p>14 designate -- cross-designate Furst for this or not?</p> <p>15 MS. FELTON: No. She's not designated</p> <p>16 for this. Ceja is not designated for this at all.</p> <p>17 MR. FREE: For b?</p> <p>18 MS. FELTON: Melody Furst is.</p> <p>19 MR. FREE: She is?</p> <p>20 MS. FELTON: Yes.</p> <p>21 MR. FREE: Good. Thank you. When were</p> <p>22 you going to tell me that? Just kidding.</p> <p>23 MS. FELTON: Well, it was in the e-mail</p> <p>24 that I sent.</p> <p>25 MR. FREE: Okay. That's fair.</p>
182	<p>1 figure out how many people participated in the</p> <p>2 voluntary work program?</p> <p>3 A. Just from what I know from working at the</p> <p>4 facility.</p> <p>5 Q. Based on that, what is the number?</p> <p>6 A. What I told you earlier, on average,</p> <p>7 about 50 to 60, I think I said.</p> <p>8 Q. Per day?</p> <p>9 A. Yes.</p> <p>10 Q. But in terms of the total number, you</p> <p>11 don't have any personal knowledge of that, right?</p> <p>12 A. No, because it does fluctuate.</p> <p>13 Q. And did you try and figure out, using any</p> <p>14 sort of document or record, what the total number of</p> <p>15 participants would be?</p> <p>16 A. No.</p> <p>17 Q. Did you review any documents reflecting</p> <p>18 the number of participants in the voluntary work</p> <p>19 program?</p> <p>20 A. No, because those are kept by the</p> <p>21 business office.</p> <p>22 Q. Now, if you look at 1613 --</p> <p>23 A. What tab?</p> <p>24 Q. It's Tab 11. -- it appears that we do</p> <p>25 have some indication about the individuals on Friday,</p>	184	<p>1 Q. (BY MR. FREE) In terms of the documents</p> <p>2 that we've looked at for initiating your participation</p> <p>3 in the voluntary work program, are those used</p> <p>4 uniformly for all of the voluntary work program</p> <p>5 participants?</p> <p>6 MS. FELTON: Object to form.</p> <p>7 Q. (BY MR. FREE) And I'm specifically</p> <p>8 talking about the agreement, the application, and the</p> <p>9 job description. Do you know which documents I'm</p> <p>10 referring to?</p> <p>11 A. Yes. Those are usually anytime somebody</p> <p>12 applies, yes.</p> <p>13 Q. It's my understanding you said that's</p> <p>14 what you use?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Now, has anybody ever complained</p> <p>17 about the pay that they receive in the voluntary work</p> <p>18 program?</p> <p>19 MS. FELTON: Object to form.</p> <p>20 A. If they did, they may have put it on a</p> <p>21 grievance. I don't think anybody has ever verbally</p> <p>22 come to me. It may have been on a grievance.</p> <p>23 Q. (BY MR. FREE) Okay. Do you recall ever</p> <p>24 seeing such a grievance?</p> <p>25 A. It's possible.</p>

185

1 **Q. Okay. Do you have any idea what your**
 2 **response would have been?**
 3 A. Well, it depends on what the grievance
 4 actually said.
 5 **Q. Assume the grievance was that they should**
 6 **have been paid more.**
 7 A. Then I --
 8 MS. FELTON: Object to form.
 9 **Q. (BY MR. FREE) You can answer.**
 10 A. What's the question again? I'm sorry.
 11 **Q. I'll start over, just because it's been**
 12 **sitting in the air for a while.**
 13 A. Thank you.
 14 **Q. Assume that a detainee filed a grievance**
 15 **saying he or she thought he or she should be paid more**
 16 **than \$1 for participating in the voluntary work**
 17 **program. What's GEO's response to that grievance?**
 18 A. It would probably be that the pay is
 19 determined by ICE and annotated in the contract.
 20 **Q. Okay. When you say that the pay is**
 21 **determined by ICE, are you referring to ICE's**
 22 **voluntary work program document?**
 23 A. Yes, and the contract, because it talks
 24 about the dollar a day in the contract.
 25 **Q. Okay. Let's just take a look at that**

186

1 **very quickly and then I think we're in the**
 2 **homestretch. If you would turn to page 49 in Tab 7,**
 3 **please.**
 4 A. Okay.
 5 **Q. If you look at the right-hand column, the**
 6 **section is called Compensation. And at the right, it**
 7 **says, "The compensation is at least \$1.00 (USD) per**
 8 **day." Do you see that?**
 9 A. Yes.
 10 **Q. Do you agree that says "at least"?**
 11 A. Yes.
 12 **Q. Then you mentioned the contract and you**
 13 **said the contract discusses the dollar-a-day program**
 14 **and sets the rate --**
 15 A. Yes.
 16 **Q. -- is that your testimony? Let's look at**
 17 **page 2 in Tab 7. Are you looking at item No. 4 where**
 18 **it says, "Stipend for detainee work program"?**
 19 A. Yes.
 20 **Q. Is that what you're referring to when you**
 21 **say that ICE has set the rate at a dollar a day?**
 22 A. Yes.
 23 **Q. Okay. ICE doesn't directly reimburse the**
 24 **detainees, does it?**
 25 A. I don't know how that works.

187

1 **Q. Okay. But it is GEO's policy in the**
 2 **Aurora facility that participants in the voluntary**
 3 **work program will not be paid more than a dollar a**
 4 **day?**
 5 A. Based off of this, the dollar a day, yes,
 6 what's in the contract signed between ICE and GEO.
 7 **Q. So the answer to my question is yes?**
 8 A. Yes.
 9 **Q. Okay. Is there anything about your**
 10 **testimony that you've given today that you wish to**
 11 **elaborate on or amplify or change or correct in any**
 12 **way?**
 13 A. No.
 14 **Q. As far as you know, everything that**
 15 **you've said is true and correct on behalf of GEO?**
 16 A. Yes.
 17 **Q. And is there any reason that during the**
 18 **course of today's deposition, you were not able to**
 19 **recall facts or information?**
 20 A. Just the ones that I already stated that
 21 I would want to check.
 22 **Q. So unless you told me otherwise, there**
 23 **was nothing that happened since we started today's**
 24 **deposition that would interfere with your ability to**
 25 **recall things on GEO's behalf?**

188

1 A. No.
 2 **Q. If there is something that you remember**
 3 **after today's deposition, we would encourage you to**
 4 **let your counsel know so we can correct the record.**
 5 A. Okay.
 6 MR. FREE: I do think we've flagged at
 7 least one late-filed exhibit that we would like to
 8 see. And to the court reporter, have we flagged the
 9 instructions not to answer in the transcript? And if
 10 not, let's please do that. We'll go back and locate
 11 in the transcript the instructions not to answer.
 12 Those are all of the plaintiffs' questions at this
 13 time.
 14 MS. FELTON: I don't have anything.
 15 MR. FREE: Okay. Thank you very much.
 16 MS. FELTON: I'll handle signature.
 17 WHEREUPON, the within proceedings were
 18 concluded at the approximate hour of 2:59 p.m. on the
 19 29th day of March, 2016.
 20 * * * * *
 21
 22
 23
 24
 25

189

I, DAWN CEJA, do hereby certify that I have read the above and foregoing deposition and that the same is a true and accurate transcription of my testimony, except for attached amendments, if any.

Amendments attached () Yes () No

DAWN CEJA

The signature above of DAWN CEJA was subscribed and sworn to before me in the County of _____, State of Colorado, this _____ day of _____, 2016.

Notary Public
My commission expires

Alejandro Menocal 3/29/16 (dc)

190

REPORTER'S CERTIFICATE
STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, Darcy Curtis, Registered Professional Reporter and Notary Public ID 20064016972, State of Colorado, do hereby certify that previous to the commencement of the examination, the said DAWN CEJA was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 12th day of April, 2016.

My commission expires May 2, 2018.

Reading and Signing was requested.
 Reading and Signing was waived.
 Reading and Signing is not required.

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, Darcy Curtis, Registered Professional Reporter and Notary Public ID 20064016972, State of Colorado, do hereby certify that previous to the commencement of the examination, the said DAWN CEJA was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 12th day of April, 2016.

My commission expires May 2, 2018.

- Reading and Signing was requested.
- Reading and Signing was waived.
- Reading and Signing is not required.



Darcy Curtis
Registered Professional Reporter
Certified Shorthand Reporter

A	additions 28:13 42:2	172:2 186:10	answer 7:13,21,21 8:7,11,23 20:6 63:13 74:14 76:20 77:2 84:15,25 92:7 96:16,17 100:6 102:6 135:11,25 136:21 136:22 137:2,15 137:16 143:14 146:24 155:16 168:18 174:15 175:21 178:4 185:9 187:7 188:9 188:11	140:24 162:20 applies 29:14 125:12,14,23 184:12 apply 46:10,25 48:23 89:13 125:15 135:10 appreciate 96:18 175:22 approved 46:12 142:12 146:20 159:11 approximate 188:18 approximately 6:9 6:14 11:13,17 13:5,20 14:12,17 14:24 15:2 16:8 18:1 20:2 22:7 26:2 120:5,11 April 190:13 area 24:14,17,20 25:3,8,20,21 26:20 36:25 37:1 37:7,20 39:25 40:3,3,4,7,9,13,20 40:23,24 44:4,19 45:8,10,14 47:18 47:19,23 48:3,6,6 51:18 52:5 57:17 59:3,15 61:11 84:11,14,17,18,23 89:3 98:18,25 99:4,7 101:15,15 101:16 128:23 129:10,16 130:1,8 130:11 131:9,11 131:11,12,13,16 132:3,13,17 133:8 133:14,15,16,17 133:18,21 134:2 134:17,24 135:2,3 135:19,21 136:3,6 136:7,17 138:6,11 139:11,16 141:13 160:10,12,17 161:5,11 164:18
a.m 1:14 4:16 72:10,10,13	addressed 16:25	agreed 75:8 90:18 130:6		
abbreviation 22:16	adds 132:1	agreement 147:25 150:9 153:16,23 154:8,25 155:5 156:10 157:23 184:8		
abide 90:18 92:1,4	adjustments 29:7			
abiding 23:18	administered 147:16			
ability 10:2 187:24	administration 101:15 153:13	ahead 63:11,14		
able 78:19 127:11 127:21 138:18 187:18	administrative 53:11 54:8,11,19 54:25 55:6,7,14 55:21 56:12,15,18 56:23 57:23 58:8 59:1,8,21 60:1,6 67:5,14,18,25 69:8 71:9,15 72:16 73:4,10,17 77:16,21 78:24 79:14,23 80:7 85:10 101:16 106:5,17 109:18 109:20 111:8,19 111:24 114:3,12 114:14,15,19 118:12,18 119:2,5	air 44:15 95:19 185:12		
Absolutely 115:23 115:24		Air-conditioning 20:12		
ACA 15:17,23 17:18 27:9 61:23 62:13 64:24 65:6 66:8		al 1:6		
accepted 145:24 149:6 162:20		Alejandro 1:6 189:25		
accompany 104:14		Alexander 2:5 4:23		
accompanying 155:6		allegedly 59:24		
accreditation 16:17 17:1,14,17,23 19:16 28:10,20 64:22		allow 74:5		
accredited 17:18		allowed 135:22 136:1,9		
accrediting 17:5,7		allows 123:22		
accurate 30:19 115:12 189:3		alter 115:8		
accurately 33:11		alters 125:20		
act 105:13 108:6 156:5	admission 29:21 31:6	amend 115:8		
acting 14:10,14,16 15:4	admitted 88:4,19 128:8	Amended 3:7		
action 1:2 82:7	advance 11:8	amendments 189:4 189:5		
actions 62:12 64:13	affect 9:23 125:5	amenities 54:1		
actively 119:12	affixed 190:12	American 15:24 17:8 61:23		
activities 60:8	afforded 53:12,24 53:25	amount 80:17 105:4 146:19		
activity 60:7,12	AFOD 112:19	amplify 72:19		
acts 108:3 110:13	aforesaid 190:8	analyze 70:19		
ad 64:2 111:1 113:10 117:21	aggregate 61:2	and/or 114:7		
addendum 50:22	ago 6:14 12:21 26:24 50:10 144:13 155:4	Andrew 2:3,3,8 4:9 4:20 5:1		
addition 129:14 131:13	Agoberto 151:18	annotated 26:15 185:19		
additional 118:25 126:24	agree 21:13 125:13 142:4 144:6,9 152:10 157:17 158:3 164:6,9 168:1 170:17	annual 34:1 41:15 166:8		
		annually 28:24 33:8 65:11		
			answered 7:12	
			answering 148:25	
			answers 33:6 56:25 93:19 136:24 137:20 146:23	
			anybody 16:1 28:11 54:23 55:3 68:25 74:15 94:25 112:25 113:22 132:12 184:16,21	
			anybody's 174:19	
			anymore 149:8	
			anyplace 86:9	
			anytime 60:13 62:15,18,19 110:3 111:15,18 184:11	
			anyway 139:7	
			apart 12:11	
			apologize 82:17	
			appear 31:6 160:17	
			appeared 21:25	
			appears 147:22 148:15 151:13 156:9 159:8 166:25 182:24 183:10	
			application 36:3 48:24 142:19 146:2 147:23 153:16 184:8	
			applications 120:19 176:24	
			applied 108:12	

164:20,22 167:9 167:11,19 areas 6:18 24:13 25:15 35:8 36:3 44:13 51:20,21 122:11 131:21 132:6 134:9 137:12 141:9,11 159:24 161:10 164:3 Argueta 153:8 arrival 145:21 articulated 140:23 Aside 101:17,25 asked 8:12 31:11 137:4,7 168:13 190:9 asking 28:5 34:8 57:1 63:21,22 81:5 129:20 130:3 134:18 136:25 138:25 139:24 169:12,13 177:13 asks 146:3 aspect 22:2 aspects 5:19 24:4 assert 9:9 asserted 9:14 assign 49:1 84:23 assigned 24:24 36:17 43:18 44:9 45:24 52:4 83:20 89:3 98:7 169:6 assignment 108:8 assignments 121:25 122:1 123:8 127:12,22 140:2 160:7 164:7 165:17 assistant 12:18 18:21 19:4,8 70:3 75:15 86:22 91:15 102:22 112:20 assisting 170:3 associate's 21:8,13 Association 15:24 17:8 61:24	assume 8:12 108:12 149:20,22 166:8 185:5,14 assuming 94:22 146:24 assured 74:22 assuring 36:18 attached 100:13 103:7 106:24 107:6 133:13 148:12 155:9,19 170:25 189:4,5 attachment 3:18,21 43:1 155:18 156:6 157:14 158:6 attachments 3:10 3:17,23 attempted 118:16 attention 70:23 141:16 158:20 165:23 attorney 12:4,13 72:23 75:16 attorneys 9:9 116:18 audible 7:21 audit 65:10,11,12 65:17 auditors 65:23 audits 65:19,22 August 18:2 Aurora 3:19 13:7,8 15:6 21:14 23:11 25:16 26:24 27:17 27:21,24 28:1 29:14 34:5,6 37:24 43:11 49:10 49:18 50:1 61:22 70:20 86:8 88:5 92:14 93:9 100:23 119:20 120:3 128:9,13 129:8 140:24 141:6 157:18,19 158:2 168:15 179:2 180:23 187:2 Aurora/ICE 3:11	authority 22:22,24 146:9 automatically 56:22 available 38:17 106:12 Avenue 2:4 average 14:3 55:17 55:25 120:9,16 176:13,20,21 180:9 182:6 avoiding 25:4 aware 75:23 <hr/> B <hr/> b 11:1 26:19 45:4,6 47:22 167:4 181:15,21 183:17 bachelor's 21:10 21:15 back 9:3 33:23 43:7 46:4 55:16,17,19 55:24 56:5,9,10 56:23 57:22,25 58:1,3 60:17 66:16 67:8 68:22 69:12,13,13 72:12 82:11 87:5 91:6 93:13 95:2 97:4 100:4 103:13 113:3 115:4,20 116:17 119:18 120:23 126:16 127:1 139:7 153:20 154:4 157:1 158:4 160:3 160:14 168:12 170:12 175:4,8 181:18 188:10 background 21:7 75:14 93:23 148:25 backward 124:16 backwards 38:25 badgering 137:3 bag 162:24 bags 162:16,18,25	163:13 ballpark 176:8 177:3 barber 165:5 172:1 172:3,24 barbershop 174:22 bars 162:25 based 55:12 57:10 57:13,23 77:7 90:9 107:21 109:14 122:21 140:17 141:8 177:16,25 178:16 179:8 181:22,24 182:5 187:5 basic 48:8 basically 7:24 105:5 basis 34:1 36:19 37:11 74:9 110:7 128:21 137:1 138:5 140:11,15 146:5 147:3,9 batch 183:11 Bates 32:15 124:19 bathroom 9:11 bear 103:22 bed 25:22,23 38:14 138:19 beds 24:22 25:4,24 26:3 38:13,17,20 56:1 73:8 122:12 122:16 134:10 137:21 began 13:2 109:10 beginning 159:2 behalf 1:13 10:15 10:25 12:20 41:1 63:23 175:23 187:15,25 behavior 57:10 believe 38:13 52:5 52:17 62:5 97:24 98:10 137:8 148:12,17 153:8 154:24 155:4,9 158:18	believer 69:14 believes 138:1 best 110:8 beyond 132:8 big 96:24 billing 177:21 bills 178:1 binder 5:13 32:6,20 75:22 82:18 87:12 177:11 bit 72:14,16 121:4 blocked 125:2 blur 100:20 board 40:6 boards 29:25 30:2 body 17:5,7 114:9 book-ins 180:19 bottom 42:5 44:17 44:18 46:6 82:22 87:18 88:7 95:19 109:10 144:10 148:2 150:20 154:9 156:7 158:11 Boulder 2:13 Boulevard 2:12,16 bound 37:25 135:18 Brad 62:8 63:24,24 64:4,14,16 brain 10:1 Brambila 105:11 105:21 109:17 Brandt 2:11 5:3 break 7:7,9,14 9:6 9:11 71:20 72:9 72:23 116:10,12 116:18 175:4 breaking 136:19 breaks 9:11,11 66:25 briefly 12:16 24:9 158:20 broader 130:23 160:12 broke 72:15 129:25 broken 66:1
--	---	--	--	--

broom 131:5	4:8,19 5:17 71:19	charges 61:21	clean 24:13,20 25:3	75:10 94:5
brought 30:23	183:16 189:1,7,11	63:17,24 64:14	25:21 37:3 45:14	cleared 75:13
bucks 96:24 171:19	190:5	65:25 108:4 109:6	48:2,24 49:1 52:4	clearly 79:24
Buescher 2:9	cell 24:17 40:2 45:8	110:13	66:21 67:5,24	clients 76:13
bugs 81:21	45:10 48:5 51:10	charging 60:18,19	80:23 81:11,18,20	109:17 152:24
building 20:15	54:7,10,24 55:1,3	68:10,13 108:2	82:3 83:11 84:23	closed 54:20 79:3
44:22 94:5 96:15	59:3,5,9 78:1,9,12	check 60:1 68:21	86:13 89:3 101:4	closest 171:11
164:23	78:17,20,23 79:3	68:24 75:14 93:23	101:14 102:18,20	cloth 95:18
bullet 127:10	79:5 81:20,20,25	119:8,11 124:8	134:14,21 136:5	clothes 24:23 25:5
bulletin 29:25 30:2	99:2 107:15,16,19	187:21	138:13,14,17,18	clothing 122:15
bunk 122:12	117:15 133:1	checked 60:8	138:20 160:10,12	clutter 122:14
131:13 134:10	167:8,10	106:22 109:20	161:5 163:20	134:12 137:23
137:21 138:19	cells 39:21 40:18	checking 158:4	Clean-Up 3:13	cocounsel 115:18
bunks 136:15	47:24 48:4 59:17	checks 107:11,14	cleaner 48:11	code 105:14 108:7
business 18:15	59:18 118:4,10,10	107:18,21 117:21	136:8	110:10 170:15
181:11 182:21	164:3	117:24 118:6	cleaners 44:5	172:5 174:9
busy 99:22 100:2	center 3:11,19	173:17,24	cleanest 163:16	codes 91:4
	34:14 157:5,24	chief 17:24 18:17	cleaning 25:8 34:17	coffee 9:10
C	certain 5:18	18:24 28:21 64:15	34:24 35:5 43:3	cognition 9:23
c 2:1 11:1 27:2 39:6	certificate 21:11,21	69:3,13 106:4	43:18,24 47:18	College 21:14
39:24 121:20,22	190:1	112:8 175:19	51:10,17 57:17	colloquy 104:17
123:7 128:3	certify 189:1 190:5	child 138:13,17,18	61:11 67:18 68:9	colon 130:13
159:22	190:10	138:22	68:19 69:21 71:16	132:21 137:9,20
C-h-o-a-t-e 159:16	chain 18:17	chips 162:25	84:5 85:24 97:16	138:4
call 26:6,12 32:15	chairs 133:10,12,13	Choate 3:22 159:16	98:17,20,22 100:1	Colorado 1:1,13,15
159:19 164:15	134:14,21	choose 108:24	128:22 129:10	2:7,10,13,16,17
171:2	chance 82:20,23	chores 160:13	130:23 131:4	4:18 9:8 13:7
called 45:18 91:17	87:20	chosen 36:3	132:22 133:6,10	189:13 190:2,5
186:6	change 19:7 33:18	Circle 82:11	133:25 160:16	column 36:10
calling 79:15	33:24,24 66:5	circumstance	164:20,22	43:23,24 116:3
calls 149:1	72:19 115:8	99:20	cleanliness 45:7	127:20 128:17
candy 162:25	116:21 180:10	CITY 190:3	167:8	178:7,8,11 186:5
Canyon 2:12	187:11	Civil 1:2 4:2 5:10	cleans 96:11 99:6	combination
care 75:12,15 171:1	changed 66:14	claiming 76:22	cleanup 36:16,19	113:11
carpets 101:14	changes 28:9 34:1	clarification 96:19	36:24 37:7,10,15	come 17:16 40:19
case 4:10,22 5:13	47:15	clarify 43:23 44:21	37:16,19 38:7	49:10 51:14 54:10
6:4,23 27:17	changing 19:25	47:22 61:8 77:3	83:10 85:22 97:25	59:4,6 65:10
75:19 76:13,18	20:1	85:20 108:19	98:2,5,6,8,12,13	70:23 71:5 85:14
104:9 105:10	charge 59:23 62:16	clarifying 124:3	98:15 152:9,12	91:6 94:8 102:15
106:11 118:9	62:19 69:2 110:7	classification 18:6	154:19,21	116:7 119:8 138:4
151:13 179:12	110:12	64:10,12 171:9	cleanups 49:3	175:4 184:22
cases 6:5 68:17	charged 52:1,14	173:6 174:4	51:19	comes 83:23 90:6
82:2	53:7 56:20 57:16	classified 168:24	clear 5:9 7:4 58:19	94:4
categories 89:9	61:5,10 66:20	169:18 171:5	88:25 102:12,21	coming 15:14
132:8 164:14	68:8,18 85:4	172:21	134:18 160:21	60:17 179:12
category 89:6	109:25 110:5,6,9	classify 172:22	169:11	command 18:17
Ceja 1:4,12 3:2 4:5	111:15	classroom 16:5,13	clearance 74:21	commencement

190:5 commercial 136:8 commissary 52:18 81:19 105:22 commission 189:19 190:14 committed 118:1 committee 33:25 34:2 42:1 58:23 63:7 common 24:17 37:1,7,20 40:3,3,9 40:20,24 44:19 47:18 48:3,5 51:20,21 59:2,15 84:11,17 98:17,25 99:4,7 114:1 131:13 133:15,17 136:7 141:12 164:3 communicate 113:5 communications 72:22 Community 21:14 company 12:22 63:19,22,23 138:1 company's 43:11 compared 67:2 154:3 compel 135:22 136:2 compensated 86:20 compensation 177:14 186:6,7 compiling 30:12 complained 69:20 69:24 184:16 complaint 70:6 completed 7:13 59:23 108:23 completely 116:24 compliance 62:2,13 comply 29:20 32:2 51:1,3,4,24 52:13 79:22 80:13 81:2 81:8 90:24	complying 57:17 Compound 53:4 comprise 125:3 166:14 computer 106:6 113:6 183:11 computerized 60:25 62:5,6 computers 20:18 conceding 67:15 conceivable 67:23 concerned 82:6 148:18 concerns 73:21 76:6 concluded 188:18 conclusion 149:2 condition 38:8 118:2 conduct 60:24 conducting 108:23 confidential 3:22 76:8 confinement 85:8 confused 96:1 97:1 125:11 confusing 96:2 connected 40:16 84:18 consequences 79:9 108:16 consider 24:16 131:10 consideration 125:5 126:1 considered 40:4 63:6 64:1 constant 120:13 179:11 constrains 137:9 constraints 125:1,3 125:6 135:18 constructed 13:11 contact 112:9 contagious 38:9 contain 26:5 91:4 114:9	containing 31:8 contains 90:22 158:25 contemplated 168:23 contending 135:2 content 12:4 contents 12:14 contest 7:6 58:7 continue 32:13 109:22 145:19 150:12 continues 180:8 continuous 34:16 34:24 35:5 97:15 contract 15:17,18 15:20 29:11 37:25 38:19,21 90:16,18 91:19,24 92:3,9 100:13,20 103:7 124:8,12,17,20,23 125:16,17,19 126:5,5,15,16 127:5 130:5 135:17 146:18 147:17 148:6,9,20 148:24 150:7 155:1,6,20 156:6 157:15 171:1 172:20 185:19,23 185:24 186:12,13 187:6 contracting 29:1 112:17 contractor 65:13 125:5,25 134:8 contractors 92:13 93:8,21 94:3,7,13 134:4 contracts 33:24 control 63:20 controls 90:12 controversy 190:6 conversation 160:15 cook 169:23,25 170:16,17 171:3	174:14 cookies 163:15 cooking 169:19,20 169:23 170:22 174:12,13,16 cooks 172:18 coordinator 15:5,9 15:12 16:16 70:15 copies 145:7,9 copy 29:17 60:21 62:24 65:8,9 68:16 145:15 151:20,22 corner 33:1 46:6 82:22 88:8 144:10 154:9 156:7 167:2 corporate 27:12 34:3 70:20 134:19 corporation 150:8 correct 8:21 19:20 29:15 30:7 31:16 34:4 35:1 42:9 44:9 49:5 50:7 56:14 68:7 69:19 72:19 76:9 77:9 77:13,20 78:10,21 79:7,24 80:3 86:21 87:17 101:19 102:2 106:14 107:6 109:19 111:23 116:22,25 126:25 144:21 145:3 147:11,19 155:8 158:13 164:11 166:17 174:3 176:5 180:6 187:11,15 188:4 corrected 8:24 Correctional 15:24 17:8 61:23 corrections 171:10 171:14 correctly 40:16 69:6 105:19 129:23 141:7 161:16	correspondence 12:12 corresponds 178:8 COTAR 29:1 112:16 159:9 counsel 4:10,19,21 4:24 5:1,3,5 9:12 32:12 82:18 96:19 97:12 104:12 136:20 183:13 188:4 190:10 count 38:14 64:8 County 189:12 190:3 couple 43:7 44:23 103:24 104:5 course 49:13 180:21 187:18 court 1:1 4:12,14 4:15 6:10 7:21 8:4 71:22,24 72:2 103:18 188:8 cover 7:3 35:12 94:3 141:12 covered 24:4 35:12 161:18 covers 35:8 41:25 165:16 cream 163:15,22 164:1 create 60:11 148:19 149:17 created 43:10 68:1 83:12,13 109:24 142:8 143:19,23 158:1 creating 27:8 criminal 21:9,10 22:1 89:15 criminology 21:10 cross-designate 183:14 current 29:11 33:11 36:22 38:14 125:17 currently 19:11 28:9 29:5,6 65:15
---	--	---	---	--

Curtis 1:14 4:15 190:4	151:1 164:14 178:23 180:2,10	depends 50:10 56:9 63:5 66:14 99:19	details 10:2 162:1,2 162:15	84:4 85:14,17,23 86:8,11,17 89:14
custody 55:10,11 55:12,15 119:5	182:8 185:24 186:8,21 187:4,5	119:11 120:18 180:19 185:3	detained 24:16 37:24 49:18 53:21	90:22 94:18 97:16 97:21 98:5,8,11
customarily 128:22 129:1,9	188:19 189:13 190:13	deponent 4:18 96:25 116:13,19	55:4 102:16 107:15	101:19 102:2 118:14,16 122:2
Customs 22:17 23:5 156:6	day's 83:22 days 14:6 56:10	deportation 112:23 deported 179:14	detainee 3:14,20 27:6 31:2,14	122:10 123:5,9,23 124:6 126:24
cutting 174:19	58:5 105:17 162:4 176:15,21	deposed 6:8,13 7:20	32:24 33:1,21 36:13 37:23 38:4	127:11,21 130:18 131:6,20 132:8
cycle 180:9	dayshift 83:23 dc 189:25	deposition 1:4,12 3:6,8 5:10,11,14	42:17,18 44:9,14 45:7 48:19,20,22	134:4,8,21 135:7 135:13,22 136:2
D	deal 64:6 93:1 94:12	5:15,16,19 6:2,5 6:15 8:22 11:6,9	50:25 51:3,15,24 53:7,20 55:10	136:10 138:1 141:4 142:10,19
d 3:1 11:1 26:19 162:9	debris 25:11 122:14 134:12	11:14,23 12:5,9 32:8,9 41:7 47:11	59:20 67:23 71:6 71:13,15 79:16,21	145:10 156:13 159:23 160:8
D-e-e-t-s 101:10	December 178:3 decide 48:22 63:10	74:1 82:15,16 87:9,10,13 92:19	79:25 80:20 84:1 85:21 87:25 88:4	162:2 163:18 169:23,25 172:14
Dagoberto 151:24 151:25	decided 149:7 decides 108:24	93:15 100:5 104:2 104:3 115:14	88:9,18 90:8,21 95:25 96:16,20	173:3,10,17,25 174:25 178:7,12
daily 34:17,24 35:5 36:16 97:15,22	decision 63:19,22 Deets 101:10	119:17 144:15 155:13 158:22,23	97:14,20 99:17 111:19 119:14	178:22 179:1,10 179:10,19,20,25
122:12 134:11 136:15 137:21	defaced 118:10 defendant 1:10	177:12 187:18,24 188:3 189:2 190:7	128:7,8,17 129:6 139:10,16 142:24	180:22 186:24 detaining 123:22
180:10	2:14 3:8 5:6,12 Defendant's 3:9	derivation 114:19 describe 24:9 73:2	147:25 150:9 154:8,25 155:5	detention 3:19 13:3 13:8,14 15:6 18:5
danger 81:3	deficiencies 17:13 17:20	described 35:22 43:17 54:17 64:3	159:7 160:21 166:3,14 167:4,7	23:11 25:16 26:24 27:11 29:4,10,14
dangerous 138:16	definitely 8:6 definition 133:20	100:7 144:14 146:7 165:9	167:16 176:13 185:14 186:18	31:17 37:24 49:10 49:18 50:1 65:16
Daniel 103:19	174:4,6 degree 21:8,10	describing 107:10 141:23	169:16 176:13 185:14 186:18	67:9 70:12 87:3 92:14 100:23
Danielle 101:10,17 101:25 103:2	degrees 32:20 deleted 28:13	description 141:21 142:4,14 151:14	detainee's 31:16 54:24 104:14	92:14 100:23 112:22 119:21
Darcy 1:14 4:15 190:4	deletions 42:2 delineation 40:13	152:7,19 153:15 154:18 184:9	detainees 23:17 24:9,13 29:14	121:6 122:21 124:4 140:21
date 4:15 47:13 75:7 105:5 107:24	DeMuro 2:16 Denver 1:13 2:7,10	descriptions 168:8 design 87:4	30:16 31:5,19 32:1 34:17,25	151:23 155:7 168:17,19,20,24
109:9,12 142:21 143:25 144:6,9	2:17 4:17 21:19 21:22 190:3	designate 183:14 designated 5:17	35:2,5,23 36:6,15 36:17 37:6 38:15	169:5,7,17,18 170:18,21 171:5,8
145:21	department 18:5,6 19:15,21 20:3	6:17 92:23 183:15 183:16	39:18 41:16 42:8 42:11 43:18 45:13	171:12,13,20,21 171:25 172:5,18
dated 87:4	28:19 64:12 103:4 119:4,15 174:5	detail 143:10 147:11,12 148:3	45:21,23 46:19,22 47:17 48:13 49:11	172:23 173:2,5,9 173:12,14,20,21
dates 178:8	depending 31:10 53:8,14 56:21	150:21 151:4 158:10 161:13,17	49:15,25 51:14 54:11 61:22 71:4	174:5,12,23 determination 9:13
David 26:19		162:21	74:6 77:10 78:22 79:9,13 80:12,21	103:4,6,15 135:17 169:9 170:25
Dawn 1:4,12 3:2 4:5,18 189:1,7,11			81:14 83:16,19	
190:5				
day 9:2 36:15,25 48:6 54:9 55:24				
56:5 61:3 78:8 97:22 98:7 101:12				
102:15,16 117:16 120:6,8 121:2				
144:16 150:22,22				

determine 69:5 172:5 173:2	117:2,6,8,14,22 118:12,17 119:2,5	155:24 156:3,4,9 157:2,3,3,12,19 158:1,24 159:5 166:1,4,20 177:9 177:16,17 182:14 185:22	drink 162:25 ducts 44:15 95:19 due 12:22 73:21 120:15 duly 4:6 190:6 duties 18:3 19:7 51:17 91:15 152:11 175:12	edge 84:2 edited 106:25 educational 21:7 Edward 26:20 effect 33:23 166:6 effective 166:6 eight 164:14 either 106:4 107:25 147:17 154:25 155:5,9 156:16 165:22
determined 63:3 185:19,21	discipline 88:10 disciplined 21:2 disclosed 124:17 Disclosures 3:10 discovery 76:5,7 discrepancy 90:11 discuss 9:12 28:2 discussed 9:2 11:4 35:10 51:13 153:23 161:6	documentation 17:3 documenting 59:20 documents 11:8,11 11:14,19,21,22 23:4 31:5,8,14,22 31:22,23,24 32:11 60:11,18,20 61:1 67:25 68:1,10,11 68:14 76:13 83:5 83:12 92:12 93:7 93:18 94:12,16 96:8 100:9 104:14 104:20 105:4 109:24 110:8 115:13 153:14 156:12 158:14,17 166:14 181:17 182:17 184:1,9	due 12:22 73:21 120:15 duly 4:6 190:6 duties 18:3 19:7 51:17 91:15 152:11 175:12	effect 33:23 166:6 effective 166:6 eight 164:14 either 106:4 107:25 147:17 154:25 155:5,9 156:16 165:22
developed 36:15 45:17 97:21	discusses 24:12 186:13 discussing 25:4,22 27:23 37:17 41:14 46:4 56:14 181:4	doing 50:11 60:23 71:20 77:24 84:20 95:17 96:9 99:25 101:17 130:23 137:24 160:2 162:21 165:10,13 170:21 171:2 172:7,14 173:16 173:16,24 175:17	early 22:6 easier 73:19 95:9 113:5 eat 37:2 eating 60:16 echelon 28:22	elaborate 187:11 elect 39:19 elects 147:1 elements 148:24 eliminate 94:13 else's 102:14 emphasis 21:9 employed 16:12 18:10 19:13 190:10 employee 64:11 93:20 150:5,10 employees 12:7,13 43:13 46:18,21 47:3 64:11 69:5 92:13 93:8,20 94:3,7,13 140:20 employing 168:11 168:11
develops 41:22	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	door 78:15,17 79:3 79:4 112:12 118:23 doors 40:18 54:20 dormitory 142:4 double-check 148:11,16 Draw 171:17 drawn 29:5	earlier 9:2 35:10 41:14 49:4 54:18 56:20 68:5 88:3 89:2,21 92:20 97:17 98:10 99:1 104:13 106:21 107:10 109:15 110:17 116:22 117:7 119:6 121:4 125:12 128:7 129:3,4 130:10 131:10,14 144:22 153:23 160:14 161:6,12 167:14 168:4,13 176:9 182:6	employ 168:11 168:11 employment 12:24 13:6 23:4 150:7 empty 101:13 encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
diagram 73:20,25 74:5,15,17 75:5 77:4,5 173:19,20 173:21,23	discussion 4:13 84:17 109:14 115:3 130:20	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
differ 53:19 66:12	discussion 4:13 84:17 109:14 115:3 130:20	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
difference 33:5 53:22 166:4	discussing 25:4,22 27:23 37:17 41:14 46:4 56:14 181:4	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
different 25:15 26:3 27:25 56:19 66:6,10 83:9 84:19 96:17 153:22,25 154:5 156:16 173:8,13 180:11	discussion 4:13 84:17 109:14 115:3 130:20	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
differentiate 26:12	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
direct 19:20 23:9 23:12	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
directive 74:4	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
directly 19:19 91:8 160:25 186:23	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
director 112:20	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
disagree 132:11	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13
disciplinary 52:19 52:21,22,23 53:5 53:9,16,19 54:5 54:13,15,19 55:2 55:4,6 56:13,16 57:2,5,7,13,15 58:22 59:22 61:5 61:21 62:12 63:17 63:24 64:13,22 65:25 69:2 72:17 73:3,11 77:18 79:10 80:22 82:7 85:4 89:21 90:1 104:16 105:3,7,9 105:17,24 106:21 108:16 109:25	discussions 12:7 disease 38:9 disinfectants 44:6 disinfecting 136:7 distinction 169:15 distributed 83:15 83:19	drawn 29:5	emailed 68:1 e-mailing 112:14 e-mails 62:15 67:11 67:12 68:18,23 114:23	encompass 179:20 encompasses 167:21 encompassing 35:7 98:11 encourage 188:3 endurance 7:6 Enforcement 22:17 23:6 156:6 engage 130:18 131:7 engineer 181:7 English 30:25 31:2 31:6,12,13

enjoy 55:19	exception 7:11 9:13	79:8 156:2,11	138:18 145:24	74:10,12,20,24
ensure 42:14 60:4,9	34:15 45:22,23	explicit 122:6	149:15	75:2,6,10,20,23
117:25 119:6	48:7 158:16	explicitly 90:23	facts 187:19	76:9,11,16,21,24
ensured 23:17	exchange 12:12	extended 40:8	factual 140:15	77:5 78:13 79:1
ensuring 16:24,25	excluded 133:20	extends 40:23	failing 52:13	79:11 80:4,9 81:4
20:8 23:14 24:3	excluding 93:1	134:20	fails 51:3	81:9,16 82:1,9
24:12,22 60:17	excuse 38:24 50:17	extent 90:21	failure 81:11	83:18 85:9,18
173:17	62:18 85:10 97:24	extra 24:23 163:1	fair 7:17 8:7,13,24	86:1 87:16 88:13
entail 24:2,21	108:21 113:24		9:4,14 16:11	88:16 89:16 90:5
entails 25:9 123:11	136:5 143:23	F	33:15,18 35:24	90:14 91:1,22
enter 5:15	151:24 178:2	f 11:1 27:4 92:18	43:9 79:19 82:12	92:6,22 93:3
entered 83:1 130:9	179:1,24	93:16 100:4	92:10,25 102:14	94:20,22 96:13,21
152:14 156:24	execution 23:10,13	F-O-I-A 156:8	109:23 123:17	97:2 101:20
enters 79:16	exemplar 157:3	face 77:16,18	137:14 138:22	103:11 104:10
entire 43:16 136:7	exempt 176:6	facilities 86:5 92:15	139:3 149:20	107:17 108:18
entirety 104:1	exempted 175:11	92:24 93:1	183:25	115:21 120:7
entitled 121:21	exhibit 3:7,9,11,13	facility 13:8,10	fairly 120:13	123:12,24 132:10
149:10	3:14,15,18,19,22	15:6,14,20 17:1	falls 84:8,9 134:24	135:8 136:11,20
entry 151:19	5:15,16 24:8 32:7	17:12,18 18:11	false 144:24 145:2	136:25 137:3,16
EOIR 101:15	32:9 36:9 41:6,7	19:12 23:11 25:16	146:13	139:2,4,12 140:13
equipment 16:24	43:6 47:11 82:15	26:25 27:16,18,21	familiar 177:19	141:1 143:17
equivalent 142:6	82:16,22 87:8,10	27:25 29:15 31:6	far 10:5 51:23	148:7,10,21,23
especially 57:11	87:17 93:14,14	36:4 37:24 38:15	56:18 72:18 77:8	149:3,12 156:14
102:21	95:10 97:23,24,25	41:20 42:15 43:16	82:5 84:3 115:11	156:22 157:9
ESQ 2:3,5,8,11,15	103:9 104:1,3,11	49:10,18 50:1	126:18,22 129:10	167:23 172:8
essentially 127:19	116:1 119:18	52:24 61:22 62:2	148:8,18 150:7	173:4 177:5 179:3
estimate 49:25	155:12,13 158:21	65:11 69:19 73:25	174:2 187:14	181:10,23 183:15
164:13	158:23 177:10,12	74:2,3,5,5,7,15,16	fascinated 21:25	183:18,20,23
et 1:6	181:18 188:7	74:17,18 75:1,9	faster 99:23 176:22	184:6,19 185:8
evening 164:23	EXHIBITS 3:6	75:11,13 79:17	feces 118:10	188:14,16
everybody 28:12	exist 93:18	88:5 92:14 97:13	federal 4:2 5:10	field 13:15 16:5
56:5 94:4 102:8	existence 92:12	100:23 102:15,16	6:10,11 121:6	112:20 144:7,9
102:13 111:14	expand 8:21 132:7	113:22 119:21	feel 8:17,22 9:2	fight 57:11 109:8
everybody's 102:17	expanded 8:24	120:3,17 128:9	130:2	fighting 105:13
exact 174:6	expands 124:5	131:8 138:9	feeling 9:17	108:7
exactly 11:12 61:15	expected 42:14	140:24 141:6	Felton 2:15 5:5,5	figure 107:20 110:7
90:17	121:21 127:21	151:5 152:9,11	11:7 31:3 42:21	172:10,13 182:1
examination 3:2	experience 63:3	154:19 156:18,21	43:20 44:10 46:1	182:13
5:7 190:5	112:5 143:6	157:7,10,11,18,19	46:24 47:21 48:15	file 31:16,17 60:15
examine 11:8,11	expires 189:19	157:22 158:2	49:6,22 50:16	60:15,22 64:8
examined 11:14	190:14	159:12 164:21,22	52:15 53:3 54:21	67:9 70:22 104:14
exemplar 157:2	explain 27:7 53:1,5	168:16 176:12,21	57:21 58:10 61:7	106:23 151:23
example 42:3,24	53:23 102:5,7	179:2 182:4 187:2	61:14 63:18 66:3	filed 103:18 119:22
81:18 102:9,23,25	explained 51:13	facility's 36:14	66:23 67:7,20	119:23 120:24
102:25	78:25 79:16 85:13	97:20	68:2,20 69:9	185:14
examples 37:11,12	explains 151:25	facing 73:16	70:25 71:17 72:3	files 70:12
37:14 138:2	explanation 56:17	fact 52:6 75:22	72:4 73:22,24	fill 48:23 71:5

83:21 106:13 142:20 filled 56:2 61:13 146:4 filters 20:1 final 28:15 64:5 Finally 10:24 find 5:14 61:25 68:18 75:7 84:4 86:3 93:7 103:5 124:16 144:4 145:19 147:16 161:22 175:15 181:1,17 findings 109:8 fine 9:19 41:19 71:21 75:24 137:13 172:22 finish 8:6,7 63:12 76:2 finished 76:1 fire 16:17,23,24 19:15 22:22,24 41:24 firm 69:14 first 4:6 7:5 24:8 72:17 75:13 83:8 87:4 102:6 104:23 110:11 116:20 137:6 147:5 166:11 177:16 five 6:9 14:7 18:25 175:4 five-minute 175:4 fix 17:19 fixtures 44:15 95:18 122:17 flagged 188:6,8 flip 170:12 floating 153:25 flooded 118:10 floor 16:7 77:12 81:21 122:13 134:11 135:22,23 135:24 136:3 137:22 138:15,20 138:23 139:18	floors 37:4 45:9 48:5 99:3,5 139:5 154:19,22 167:9 fluctuate 180:18 182:12 fluctuated 120:12 fluctuates 120:14 120:18 fluids 96:11 focus 94:11 137:11 focusing 172:15 FOIA 156:8 fold 84:2 folded 24:23 25:6 folks 34:6 59:1 follow 7:5 17:15 35:14 39:16 51:2 61:15 86:6 89:20 90:13 98:4 121:16 125:25 126:6 129:10 132:13 161:3 173:11 followed 23:15 111:17 113:13 132:6,20 137:9,20 141:6 following 4:1 69:6 83:22 124:25 125:3 follows 4:7 88:8 126:20 food 24:23 25:4 81:21 164:17 170:15 foot 25:11 forbid 9:8 force 123:23 124:1 126:19 132:7 forced 134:6 forcing 132:12 134:21 foregoing 189:2 190:8 form 3:18 31:3 42:21 43:20 44:10 46:1,24 47:21 48:15 49:6,22	50:16,21 52:15 53:3 54:21 57:21 58:10 61:7,14 63:18 66:3,23 67:7,20 68:2,20 69:9 70:25 71:6 71:17 78:13 79:1 79:11 80:4,9 81:4 81:9,16 82:1,9 83:18 85:9,18 86:1,16,17 88:13 88:16 89:16 90:5 90:14 91:1,22 92:6,22 94:20 101:20 106:13,23 107:6,17 108:18 109:20 120:7 123:24 124:18 132:10 135:8 136:11 139:2,12 140:13 141:1 143:17 144:7,18 144:23 145:1,8,16 145:24 146:14 148:7,10,14,19,21 148:22 149:6,9,12 150:19,19,20 154:5 156:14,22 157:9 160:2,3 167:23 172:8 173:4 177:5 179:3 181:10 184:6,19 185:8 190:8 formal 71:14 88:8 formalizing 64:1 format 62:4 109:2 forms 107:1,4,5 144:3 145:17,19 formulation 23:21 forth 41:15 79:24 121:6 167:13 170:12 forward 22:18 forwarded 104:15 found 53:16 57:8 144:2 foundation 123:21	four 6:9 55:17,23 58:17 68:22 70:1 73:13 122:6,9 130:6,12,24 131:15,23 132:2,8 132:14,20 134:20 138:3 141:5 168:2 168:3 fours 136:16 frame 120:18 FRCP 3:7 free 2:3,3 3:3,4 4:8 4:9,20,20 5:8 8:18 8:23 9:3 31:4 42:23 43:22 44:12 46:2 47:4,10,14 48:12,18 49:8,24 50:17,18 52:21 53:4 54:23 58:6 58:14 61:9,17 63:21 66:7 67:3 67:10,22 68:4,25 69:11 71:2,19 72:1,3,5,8,12,15 73:23 74:8,11,19 74:22,25 75:4,8 75:17,21 76:1,10 76:14,19,22,25 77:1,2,6 78:14 79:4,13 80:5,11 81:6,11,17 82:5 82:11 83:24 85:10 85:20 86:3 87:17 87:18 88:14,18 89:17 90:7,17 91:3,23 92:10,11 92:25 93:4 94:21 94:24 96:18,23 97:3,8,11 101:22 103:12,13 104:11 104:13 107:20 108:21 114:25 115:4,6,23,25 116:11,14,17,20 120:10 122:13,14 123:17,20 124:2 132:14 134:11,12	135:11 136:14,23 137:1,6,18,22,23 139:3,6,9,14 140:15 141:3 143:18 148:8,14 148:22 149:1,4,5 149:14 156:17 157:1,10 167:24 172:10 173:7 175:1,8,10 177:6 179:4 181:13 183:13,17,19,21 183:25 184:1,7,23 185:9 188:6,15 Freedom 156:4 frequency 43:25 Friday 182:25 front 24:7 32:6,21 39:2 44:24 59:5,6 123:18 126:19 129:2 141:18 FTOs 16:5 full 14:4 137:14 fully 75:23 function 70:17 106:19 109:4 113:17 functional 172:6 Functionally 173:7 173:12 functions 173:25 furniture 44:18,19 45:23 122:17 Furst 183:14,18 further 4:10 6:1 190:10
G				
g 11:1 27:4 106:22 games 40:6 Geist 4:17 general 21:8 36:16 36:19,24 37:10,15 37:16,19 51:7 54:2,7,18 56:11 98:2,5,8,12 118:7 164:7 165:17				

generally 105:1 107:12 130:20 162:3	64:13 75:24 100:4 131:5 138:15 171:3 172:19	46:4 48:19 50:8 56:22 57:12 62:16 69:18 72:8 74:1 74:13 78:22 79:5 80:6,16,16 82:14 82:18 83:11 86:13 87:8 89:19 92:22 95:7,8 96:15,17 97:3 100:16 102:10,11 103:25 104:5 105:21 109:15,24 111:2 111:20,22 112:10 112:15 113:18 114:2,6,8,11,13 115:1,19,25 116:1 116:11 117:15 119:16 120:21,22 123:12 124:16 125:13 126:4 131:2 136:20 139:2,17 142:1 152:1,25 153:9 155:11 158:4,21 159:1,19 165:23 166:16 170:11,24 171:3 173:1 175:3 175:8 177:15 180:4,7,12,16 183:22	great 8:9,20 9:6,16 9:20 10:7,19 33:20 50:25 74:19 115:16 117:2 124:10 128:1,5 162:14 greater 149:25 grievance 70:13,13 70:14,23 71:14 184:21,22,24 185:3,5,14,17 grieving 71:13 group 1:5,9,12 3:8 5:12,17 6:17 10:15,17,25 12:20 12:24 27:23 28:15 28:18 32:11 33:22 41:2 65:4,14 106:25 157:4,18 157:24 Group's 40:22 grunt 7:23 guard 169:14,22,24 guess 25:19 50:22 62:14 97:3 138:11 138:25 174:6 180:25 181:2,11 guilty 53:16 57:8 guts 20:15	128:7 handbooks 88:3 handed 82:21 handful 11:15 handle 56:11 188:16 handprints 48:10 handwritten 61:1 handwrote 154:22 hang 84:2 hanging 24:25 25:7 134:13 138:20 hanging/draping 122:15 happen 22:5 28:23 29:9 65:19 happened 64:23 109:7 187:23 happening 58:9 107:14 109:16 happens 37:15 47:24 50:25 51:5 51:25 57:24 83:20 110:3 happy 136:23 hard 8:4 62:24 68:16 138:8 harm 118:16 he'll 147:1,1 head 47:16 70:2 95:2 118:20,23 164:16 170:7 headphones 59:10 heads 28:19 174:22 174:24 health 81:7,12,22 82:7 119:7,8,13 119:13,15 hear 8:15 17:6 59:11 heard 7:2 hearing 3:16 53:10 53:13,14,15 56:24 57:8,13,24 58:3,6 60:24 105:3 108:23,24 heating 20:12
GEO 1:5,9,12 3:8 5:12,17,23 6:17 10:15,17,25 12:7 12:12,20,24 20:24 22:11 24:9 27:12 27:20,23,24 29:11 32:11 34:3,6,8 36:22 40:22 41:2 41:16 46:18,21 51:15 61:12 64:11 65:4 82:5 85:21 89:14 90:12,18 92:3,14 93:1 95:10 101:15 103:7 106:6,25 121:16 124:17,18 126:6,20,23 128:13 129:8 132:7 134:13,20 135:16,17 137:8 138:1 139:9,14 140:20 141:3 143:2 145:11,15 145:24 146:9 148:18,20 149:15 150:5,12 151:12 151:22 153:14 156:13 157:4,18 157:21,24 158:2 159:2 160:23 168:10 169:4 175:23 187:6,15 GEO's 33:11 90:4 90:11,23 100:13 115:12 134:19 136:2,9 140:11,16 141:10 148:8 150:1,4,8,10 168:15,23 170:25 172:4 185:17 187:1,25 GEO_MEN 32:12 42:6 getting 52:13 60:17	give 19:11 30:18 64:16 74:4 137:14 162:16,18 163:3,4 163:15 175:20 180:25 given 6:2,15 55:24 61:20 90:1,22 110:1 117:3,5 138:3 151:18 164:14 178:23 187:10 190:9 giving 64:14,15 72:13 79:9 136:22 glue 47:25 go 4:10 6:1 9:3 22:1 38:25 40:19 42:23 43:7 48:8 53:9 55:16,21 56:5,9 56:10,12 57:22 58:1,3 63:11,14 66:16 67:8 68:22 69:18 70:10,12 72:9 74:2,3,16 75:1,2,6,8 78:23 83:23 93:23 94:1 94:5 95:9 99:23 103:13 107:1 114:25 116:14 119:13 122:25 124:15 125:7 131:1,18 137:17 153:20 157:1 170:14 172:11,12 175:5,8 177:1 188:10 goes 41:15 57:25 75:11 102:11 108:22 111:15 122:5 180:13 going 8:4,12 10:8 10:20 22:18 24:3 24:5 29:6 31:4 32:6,7,10,15 38:25 39:1 41:16	good 4:8,14 71:24 72:2 164:2 171:19 179:15 183:21 goody 162:16,18,24 163:13 gotten 110:25 111:3 145:15 govern 147:17 government 178:1 government's 121:7 governs 29:11 Grant 1:13 2:9 4:17 granted 95:16 graveyard 83:21 86:12 98:7	H h 2:8 11:1 96:6 124:12 H-5 125:1 hair 174:19 half 158:11 hallway 69:17 102:9,10 hand 22:1,1 82:14 82:18 155:11 handbook 3:14 29:23,23,24 31:12 31:13,23 32:24 33:2,21,22 51:15 52:16 79:25 80:20 85:15 87:25 88:15 90:8,21 97:14	

<p>heavily 105:20 124:18</p> <p>heightened 118:3</p> <p>held 105:3</p> <p>help 93:18 94:16 96:13 99:19,21 100:2 104:21</p> <p>hereto 190:7</p> <p>Hernandez 152:25</p> <p>hey 55:11 112:9 149:9</p> <p>high 2:6 34:22 89:5 89:13 97:16 176:8 176:11,16</p> <p>high-level 57:11 58:24 67:2</p> <p>higher 19:9 49:14</p> <p>highest 34:14</p> <p>hire 22:22,24</p> <p>history 21:5</p> <p>hit 108:16,20</p> <p>hoc 64:2</p> <p>hold 41:16 95:2 150:13</p> <p>homestretch 175:9 186:2</p> <p>Hood 2:5 4:23,23 116:4 128:15 130:9</p> <p>hour 103:20 170:17 171:3,15,19,22 188:18</p> <p>hours 22:7 52:19 54:9 57:19 58:12 58:14,16,16 77:22 78:4,9,20 80:22 89:22 117:3,13,16 162:4 165:21</p> <p>house 77:10</p> <p>housed 38:2,3,11 57:9 60:3,14 85:21 86:8,12 119:9</p> <p>housekeeping 39:6 39:14,20,23 41:22 42:4 45:17,18 95:15 103:24</p>	<p>121:22 122:3,7,22 123:10,11 127:13 127:24 128:2 129:15 130:6,14 134:5 140:5,8 160:10</p> <p>housing 23:10 24:6 24:10,17,19 25:9 25:17,18 26:1,10 26:13,13 27:7 29:13,24 30:1,6 30:16 31:8,18 32:2,4 33:12 34:20 35:9,12,21 35:25 36:1,6,10 36:17 37:25 38:2 42:19 43:3,14 48:13 50:18 51:1 51:4,22 52:25 54:18 57:18 66:21 69:6 70:21 79:20 81:2,8 84:5,12 92:16 93:10 94:9 94:15,18 95:1 98:3,21 99:8 100:7 115:7 116:3 129:3,13 130:17 132:25 141:21,24 142:6,25 146:20 160:10,12,17 161:5 163:21,23 168:21 173:14 175:12 177:21</p> <p>huge 120:15</p> <p>Hugo 152:24,24</p> <p>Huh 133:23 163:8</p> <p>huh-uh 7:23</p> <p>human 18:15 93:21 93:22</p> <p>hundred 16:10 18:9 180:21</p> <p>Hunter 4:16</p> <p>HVAC 20:13</p> <p>hypothetical 139:6</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>I-C-E 22:17</p>	<p>ice 22:14,16,18,19 22:20,21 26:1 27:3,6,10 28:25 29:11,14,24 31:23 33:1,21 37:25 38:4,15,21 49:11 49:14 51:14 55:13 65:8,9,13 66:9 74:3,20 75:10,13 75:14 77:9,10 85:17,21 90:8,21 93:23 97:14 101:14 103:7 106:23 107:3,4 111:7,20,22,23 112:1,4,9,14 113:9 121:5 122:23 123:23 128:7,8 132:12 134:4,8 137:24 155:6 157:4,15,24 159:9 163:15,22 164:1 166:3 171:1 185:19,21 186:21 186:23 187:6</p> <p>ICE's 107:6 185:21</p> <p>ID 190:4</p> <p>idea 20:20 116:6 124:10 154:14 155:24 156:23 175:24 177:8,20 185:1</p> <p>identified 128:7 178:17</p> <p>identifier 113:9</p> <p>identify 4:11</p> <p>IDP 3:16 58:18,20 58:24 105:2,6</p> <p>Imagine 173:19</p> <p>immediate 39:25 40:8,11,13,23 122:11 130:8,11 131:9,10,12,16,21 132:3,5,13,16 133:7,14,16,18,21 134:1,9,17,24 135:2,3,19,21</p>	<p>136:3,6,17 137:12 138:6 139:10,16 141:9,11 159:23 161:9,11 167:18</p> <p>immediately 58:9</p> <p>immigrants 27:2</p> <p>immigration 15:21 22:17 23:5 26:22 26:24 28:17 156:5</p> <p>implementing 43:14</p> <p>imposed 105:4,16</p> <p>Inc./Aurora 157:4 157:24</p> <p>incident 107:24 108:3 110:12</p> <p>include 18:3 125:6 168:16</p> <p>included 20:7 130:22 134:16 163:21 168:5</p> <p>includes 27:1 30:5 32:11 98:17,20,22 98:24 133:18 141:12</p> <p>including 45:8 47:18 79:20 167:9</p> <p>inclusive 18:12 19:14 94:6</p> <p>incorporates 125:16,22 126:14</p> <p>increase 180:16</p> <p>indicate 113:9 178:21</p> <p>indicates 52:7</p> <p>indication 182:25</p> <p>individual 31:14 47:24 48:4 60:14 60:21 67:9 99:2</p> <p>individuals 182:25 183:6</p> <p>informally 71:5</p> <p>information 30:6 30:15,19 31:25 65:5 67:17 80:12 145:1 156:5 181:14 187:19</p>	<p>informed 32:1 89:14</p> <p>infraction 66:2 85:4,5 108:17 109:21 110:1</p> <p>initial 3:6,9 29:21 31:22</p> <p>initially 30:10</p> <p>initiate 89:15</p> <p>initiating 184:2</p> <p>injured 118:24</p> <p>injuries 9:25 57:12</p> <p>INS 15:22</p> <p>Insert 156:18</p> <p>inserted 157:7</p> <p>inserting 156:21</p> <p>inside 79:2 118:1 164:21</p> <p>inspect 74:16 75:1 75:2,9</p> <p>instance 57:17 60:11 109:7 157:2</p> <p>instances 110:22</p> <p>Institute 21:22</p> <p>institution 21:12</p> <p>Institutional 105:6</p> <p>instruct 73:25</p> <p>instructing 76:20 77:3 136:21</p> <p>instruction 137:2</p> <p>instructions 10:4 44:13 188:9,11</p> <p>Interdisciplinary 58:24</p> <p>interested 146:4 147:2 190:11</p> <p>interfere 187:24</p> <p>interpretation 136:1,2,9 141:10 141:11</p> <p>investigate 109:6</p> <p>investigating 109:7</p> <p>investigation 58:12 60:2,23 109:3,10 109:16,21 111:2</p> <p>involve 13:16 162:4</p> <p>involves 136:7</p>
--	--	---	---	--

<p>issue 69:21 76:17 81:22,23 82:8 130:2</p> <p>issues 16:25 41:25 60:4 69:16 71:7 119:7</p> <p>italicized 131:19</p> <p>item 186:17</p> <p>itemized 141:5</p> <p>items 25:10,23 52:20 134:23 142:2</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>j 11:1</p> <p>janitor 103:2 172:3</p> <p>janitorial 101:18 102:1 164:23</p> <p>janitors 101:4,6</p> <p>jeopardized 81:7</p> <p>job 12:16 18:3 48:23 62:9 89:24 101:11 102:14,17 102:18 108:17 141:21,23 142:4 142:14 146:2 151:13 152:7,8,19 153:15,16 154:18 168:7 171:2 175:12 184:9</p> <p>jobs 20:23 45:24 84:20,22 85:1,3 134:6 165:11,13 172:24</p> <p>John 159:16</p> <p>joining 20:24</p> <p>Judge 75:25</p> <p>July 13:1 103:17 142:22 143:24 144:7,11</p> <p>June 145:22</p> <p>jury 76:14</p> <p>justice 2:6 4:24 21:9,10 22:1</p> <p>justification 151:7</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>k 11:1 116:3</p>	<p>Kane 75:25</p> <p>keep 24:13 47:12 48:2 61:24 64:7 84:23 99:22 100:2 112:10 136:25 138:7 145:7 175:2</p> <p>keeping 24:20 25:3 25:21 51:23 66:1 122:13 133:10 134:11 137:22 138:19</p> <p>keeps 62:5 64:9 145:9</p> <p>keepsakes 122:16</p> <p>Kelman 2:9</p> <p>kept 24:24 25:10 60:12,13,20,21 62:4,12 81:20 85:17 93:21,24 145:16 182:20</p> <p>keyed 160:25</p> <p>kid 87:7</p> <p>kidding 183:22</p> <p>kind 8:11 22:1 118:22</p> <p>kinds 131:23</p> <p>kitchen 35:9 168:16,20,22,25 169:13,14,16 170:22 171:24 172:14 173:13,20 174:18</p> <p>kite 71:7,14</p> <p>knocked 118:22</p> <p>know 6:19 7:9,20 7:23 8:23 9:3,17 11:18 19:25 25:19 28:5 29:3,9,19 30:13,15,23 32:16 33:13,18 39:10 47:14,16 51:8 56:25 61:9 62:16 66:14,19,25 69:10 69:17,18 70:1,1 72:3,5 74:6 79:13 80:5 82:3 83:13 84:3 85:19 86:2,4</p>	<p>86:5 87:14 92:7 94:16 96:8,21 103:2,3 105:21,21 105:22 111:16 115:11 116:4 120:14 125:19 126:18,22 128:2 129:12 137:19 138:7,15 140:14 142:9 144:1,3 145:3,7,13,14 146:22 149:13,18 151:21 155:15 156:15 157:20 158:8 164:16,17 169:3 170:5,7 171:17,18 175:14 175:16 176:2,8 178:4,5 179:6,7 180:24,25 181:6 181:19 182:3 183:6 184:9 186:25 187:14 188:4</p> <p>knowing 8:4 67:4</p> <p>knowledge 10:16 100:11 176:3,4 181:22,25 182:11</p> <p>knowledgeable 5:18 6:18 181:14</p> <p>known 71:6 102:20</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>l 11:1</p> <p>Labor 103:4 174:5</p> <p>labor-intensive 162:5</p> <p>laid 39:24</p> <p>lane 35:17</p> <p>language 31:10 162:8</p> <p>languages 30:23</p> <p>large 26:5</p> <p>lasts 162:4</p> <p>late-filed 47:11 188:7</p> <p>laundry 35:8</p>	<p>151:14 152:2 165:4 172:3,25</p> <p>Law 2:3,12</p> <p>lawyer 11:5 181:19</p> <p>lay 123:21</p> <p>laying 24:23 25:5 25:11</p> <p>layout 73:3</p> <p>lead 85:7 102:25</p> <p>learn 71:2</p> <p>learner 73:18</p> <p>leave 116:10 137:13</p> <p>left 40:7 44:4 73:10 128:15 151:2 156:1 179:13</p> <p>left-hand 33:1 36:10 73:16 88:8 154:9</p> <p>legal 74:8 140:11 148:23,24 149:1</p> <p>length 120:16 176:13,20</p> <p>let's 12:23 42:23 44:23 53:4 56:16 83:7 84:19 87:7 93:13 106:15 114:25 116:14 123:20 124:10 131:17,19 135:4 139:7 141:15 149:20 160:21 169:10 170:8 185:25 186:16 188:10</p> <p>letter 3:22 26:14,15</p> <p>letterhead 107:2</p> <p>letters 26:17</p> <p>level 19:9 52:10,10 53:15 56:2,21 70:20 89:11 108:17</p> <p>levels 34:22 52:7 56:22 58:17,18</p> <p>liar 115:18</p> <p>librarian 169:4 172:24</p>	<p>library 152:20,21 165:14 169:6</p> <p>lieu 75:4</p> <p>lieutenant 14:10,14 14:16 15:4 59:24 60:23 62:23 69:2 106:5 109:5 110:22,25 111:11 111:20,21 112:7</p> <p>lieutenants 68:5</p> <p>life 16:25 81:6,12 82:8</p> <p>light 44:15 95:18</p> <p>lightbulbs 20:1</p> <p>lighting 122:17</p> <p>limitations 76:4</p> <p>limited 80:6,16,17 125:6 138:3</p> <p>limiting 138:24 139:1,20</p> <p>limits 140:3</p> <p>line 3:5,5 34:9 66:17 93:25 156:11 157:23 171:18</p> <p>lines 111:16</p> <p>list 36:15 83:10 85:22 86:13 89:12 97:21 98:14,15 122:5 131:22 132:1,20 134:20 137:8,21 139:21 140:8 160:2 164:9 168:2,9</p> <p>listed 12:8 44:5 89:18 90:3 98:3 108:6 122:23 130:7,12,24 132:9 134:24 142:2 174:9</p> <p>listen 59:10</p> <p>listing 61:4 178:8</p> <p>lists 3:13 91:4 97:25 123:10 164:6</p> <p>literally 93:13</p> <p>litigation 119:22</p>
---	--	--	--	---

120:24 190:11 little 48:25 72:13 72:16 121:4 125:11 170:12 lives 81:25 living 24:13,14,20 25:3,8,15,20,21 39:25 40:4,7,13 40:23 45:8,10,14 47:18,23 51:18 52:5 53:20 56:11 61:11 84:14,18 89:3 98:22 122:11 128:23 129:10 130:1,8,11 131:9 131:11,11,12,16 131:21 132:3,5,13 132:16 133:7,14 133:16,18,21 134:1,9,17,24 135:2,3,19,21 136:3,6,17 137:12 138:6,11 139:11 139:16 141:9,11 159:24 161:10,11 164:18 167:9,11 167:19 local 4:11 9:7 29:23 34:5,6 41:11 51:15 87:25 128:11,12 166:15 locate 188:10 located 37:2 74:6 location 92:12 locations 34:15 lock 40:18 locked 78:17 locker 24:24 25:11 lockers 25:6 lodged 61:21 log 60:7,12 logic 139:9 logs 107:9,10,12 long 13:4,19 14:11 14:16 15:8 16:19 18:23 22:3 56:8 69:25 107:21,23	176:14 look 7:24 10:11 32:5 38:24 39:9 41:18 52:16,19 62:14 66:4,22 67:8,10 68:17 70:10,13 82:20,24 87:7,13,20 88:24 96:8 97:4 103:6 103:19 106:15 107:25 110:8 114:2 115:20,25 116:1 123:2 124:10,22 125:7 125:24 126:5 127:1 128:2 129:13 131:17,19 142:3 146:16 147:20 149:9 155:21 160:19 169:8,10 170:6,8 173:1 174:3 181:1 181:8,17,18 182:22 183:7 185:25 186:5,16 looked 63:10,16 93:15 97:23 109:24 121:4 156:12 158:18 166:11 172:2,2 184:2 looking 43:5 46:3 49:19 69:16 79:19 82:6 95:9,14 104:19 116:2 121:21 123:3,4,13 123:15 127:17 152:5 161:4,25 166:5 168:7,9 172:4 173:1,9 186:17 looks 42:24 43:1,8 62:11 76:15,17 105:16 138:9 151:15 164:24 loop 112:10 loose 122:13	133:10 134:11 137:22 lose 89:24 105:21 losing 108:17 lot 46:9 47:23 53:22 55:15,21 57:24 63:9 71:4,7 81:19 113:5 130:16 138:2 140:7 145:7,17 163:4 lounge 102:11 low 89:8 low-level 58:23 67:1 lower 73:8 77:11 77:12 lowest 52:11 lunch 9:11 116:18 116:21 131:4 <hr/> M <hr/> ma'am 50:4 166:22 170:11 machine 190:7 machinery 138:16 magic 113:16 mailbox 62:24 68:16 mailboxes 84:2 main 136:17 maintain 34:14,17 34:25 97:16 122:10 131:20 134:9 141:8 159:23 maintained 20:16 maintaining 135:20 174:1 maintenance 18:5 19:15,21,23 20:3 44:16 45:22 46:4 46:5,9,13,15,17 46:22,23 47:1,3 95:17 96:4 101:24 102:1 108:8,13,14 165:1 172:3,25	173:1 making 20:16 25:4 25:5 47:10 69:18 122:12 134:10 136:15 137:21 138:19 171:22 man-days 177:22 178:2 man-hours 178:25 management 3:16 69:14 manager 16:18 17:23 19:15,16 28:10,20,21 41:25 93:24 mandatory 39:20 39:23 manner 122:11 131:21 132:6 134:10 159:24 Manual 3:11,20 March 1:4,13 3:2 4:16 188:19 mark 41:6 82:14 87:8 104:1 155:12 177:10 marked 5:16 32:9 32:12,18 41:7 42:4 76:7 82:16 82:21 87:10 95:8 104:3 155:13 158:21,23 177:12 mathematical 164:12 matter 69:16 72:4 72:5 76:16 82:6 matters 190:6 maximum 38:20 150:22 meal 37:3,8,12,17 44:1 48:24 49:1 51:11 81:19 83:11 86:13 136:8 140:9 meals 36:25 83:22 84:5 136:12 169:19,20,23,24 169:25 174:14	mean 15:19,23 19:24 20:5 23:12 25:17,19,21,24 35:6 40:1,2,12,12 42:18 51:17,22 52:22 66:7 73:23 73:24 80:15 98:21 101:2 107:3 110:9 116:5 127:15 153:24 154:12 162:19,22 176:23 180:17 means 32:16 51:8 116:4 134:13 measure 57:10 measures 61:24 64:5,6,25 65:5 66:5,24 measuring 66:1 medical 26:20 27:1 38:5,6,8,12 60:3,4 60:16 96:11 117:18 118:2 119:4,15 153:6 165:18,19 medication 9:22 60:17 meet 17:4 46:25 Melody 183:18 member 102:11 143:9 members 13:17,18 150:21 151:4 Memorandum 3:15 memorializing 88:21 memory 9:23 69:19 Menocal 1:6 4:21 124:18 143:24 144:24 145:16,21 145:25 149:5,16 189:25 Menocal's 144:10 148:19 mental 119:7,7,12 119:13,14
--	---	---	--	---

mentally 35:17	movies 40:5	68:23 179:12	181:2,3	53:8,8,15 57:11
mentioned 90:23	multiple 41:17 52:7	180:18		57:16,25 58:2
186:12	multiply 180:7	newer 95:11	O	61:6,11 66:20
met 11:7 17:3,10		noncompliant	oath 72:6	68:19 89:1,6,8
17:13 46:11	N	42:17	object 31:3 42:21	105:14
108:13 181:23	N 2:1 3:1	normally 53:20	43:20 44:10 46:1	offenses 58:23,25
metrics 65:23	Nakamoto 65:14	North 2:4,17	46:24 47:21 48:15	67:1,2 89:13
66:22	name 4:9,20 6:4	Notary 1:14 189:19	49:6,22 50:16	office 2:3,12 18:15
Metro 21:16,17	26:14 28:5 63:25	190:4	52:15 53:3 54:21	34:9 65:16 112:13
Metropolitan	101:9 114:7,11	note 108:7	57:21 58:10 61:7	112:20 181:11
21:18	140:8 156:18,21	notebook 39:1	61:14 63:18 66:3	182:21
middle 73:12	157:7,10,11	87:13	66:23 67:7,20	officer 13:3,14,15
173:23	named 26:11	noted 17:13 45:22	68:2,20 69:9	36:18 57:14 73:14
Milstein 2:11,12	names 28:6 83:21	45:23 97:24,25	70:25 71:17 73:24	83:20 87:3 168:20
5:3,3	113:12 183:2	notice 1:12 3:7 5:14	78:13 79:1,11	169:5,7 170:19,21
mind 47:10	Nashville 2:4	5:19 12:9,14 46:2	80:4,9 81:4,9,16	171:6,8,12,13,14
mindful 8:3	National 27:11	79:21 80:21 88:9	82:1,9 83:18 85:9	171:20,21,25
minor 7:11	29:4,10 121:5	92:19 93:15,16	85:18 86:1 88:13	172:5 173:2,5,9
minute 80:2	122:21 124:4	100:5 108:4 109:6	88:16 89:16 90:5	173:13,14 174:5
minutes 60:9	140:21 155:7	110:13 119:18	90:14 91:1,22	officer's 29:1
107:19 175:5	Naturalization	144:14 151:6	92:6,22 94:20	112:17
mixes 163:1	15:21	154:7	101:20 107:17	officers 16:6 18:5
moderate 89:5,8,13	neat 122:11 131:21	noticed 5:11,23	108:18 120:7	112:23 168:17,19
modification	132:6 134:10	115:13	123:12,24 132:10	168:24 169:17,18
125:16,19	135:2,20 136:6	notices 29:25	135:8 136:11	171:11 172:18,23
modified 8:24	159:24	notification 114:3	139:2,12 140:13	173:20,22 174:12
121:11 155:24	neatly 24:24 25:6	notified 86:17	141:1 143:17	174:23 175:20
modify 8:21 116:21	necessarily 10:16	111:14 112:1,4	148:7,10,21	official 61:12
moment 12:21	33:7 42:22 67:12	notify 85:23	149:12 156:14,22	officials 22:19,21
26:23 39:9 72:9	81:10 82:2 146:22	notifying 111:1	157:9 167:23	okay 4:8 6:15 7:2
103:23 115:1	168:1 173:15	November 178:2,3	172:8 173:4 177:5	7:10,11,15,16,25
116:10 119:17	176:19 179:20	178:9,16,22	179:3 181:10	8:15,19,20 9:17
144:13 146:24	180:4	179:11,11 180:2	184:6,19 185:8	12:3 13:21 14:13
150:1 155:4,14	necessity 176:16	183:1	objected 76:10	14:20,22 16:21
money 161:16	need 7:7,7,8 8:2 9:4	number 11:18,19	objection 7:13 74:9	18:10,16 20:10,23
month 44:1 61:4,25	17:19 28:13 29:20	26:16 38:20 43:25	94:21 148:22	22:7,10,13,21
178:2,17,22 179:2	33:18 55:12 71:20	49:25 50:2 61:4	objects 122:16	23:8,25 26:6,23
180:8,8 181:9	72:19 95:4 115:8	64:22 114:7,11	obligate 150:12	27:2 28:4 29:13
months 14:17	158:14	120:12,15 156:8	obligations 35:23	30:5,15,20 31:15
mop 37:4 131:5	needed 34:1	164:6,10 177:23	88:10	33:5,14 35:11,18
mopping 99:5	needs 7:21 8:23	180:15,24 181:9	obtain 21:12	37:18,21 38:11,14
morning 4:8,14	152:12	181:15 182:5,10	occasionally 162:3	39:13 40:1 41:1,5
98:16 130:16	neighborhood	182:14,18	occupations 170:16	41:22 42:3 43:9
move 103:24	49:19	numbers 26:17	occur 17:2	43:13,17 44:12,20
moved 53:17 58:4	never 37:18 40:18	32:15 49:17 61:25	occurred 59:24	45:4 47:4,9,17
movement 54:3,4	116:6 138:9 178:5	62:11 64:5,6,9,13	October 109:13	49:24 50:6,12,21
80:6,16	new 13:17 15:13	113:7,8,11 180:17	offense 52:2,3,7,14	51:23 52:12 57:5

59:19 61:17,19 63:6,14 64:9 65:4 65:22 69:11 70:19 71:20 72:9,25 73:18 74:8 76:14 76:22,25 77:14,18 79:19 80:11,15,20 81:24 82:13 83:15 83:24 84:8 86:10 86:11 87:7 89:5 90:17 91:3,6,13 91:20,25 92:2 94:11 95:14 96:5 96:7 97:6 98:2 99:24 100:12 101:17 103:22,25 104:6,7,19,22,23 106:8,11 107:20 108:15 109:1,9 110:20 111:5,25 112:3,14 113:16 114:25 116:11,13 117:14 118:25 119:16,23 120:10 121:10 122:5 124:21,22 125:12 126:4,8 127:19 128:5 129:5,18,21 131:17,18 132:4 132:18 133:9,23 134:3 135:20 136:14 137:14,20 137:24 138:14,21 139:19 140:20 141:10,15 142:8 143:8,18 147:4,12 147:20 148:5,14 149:14,24 150:4 150:12,25 152:17 153:19,24 154:7 155:11 157:1,14 157:17,21 158:1,7 158:9 159:20,21 159:22 160:5,16 161:22 162:1,14 162:24 164:1,4,12 165:15,20,25	166:10,13,25 167:21 168:7,13 168:22 170:2,14 171:7 172:1,16 173:7,18 175:5 176:7,16 178:6,18 179:8 180:7 181:1 181:6,13 183:3,10 183:13,25 184:16 184:23 185:1,20 185:25 186:4,23 187:1,9 188:5,15 old 44:22 68:23 95:16 120:17 145:8 146:14 on-the-job 16:6 once 6:22 44:1,1 53:14 59:23 65:20 142:12 163:15 177:18 ones 26:5 29:12 48:8,24 85:22 139:20 144:3 164:2 187:20 open 5:13 60:15 openings 120:20 operates 42:15 operating 138:16 operational 125:4 126:1 operations 12:18 18:21 19:4 70:4 86:23 91:16 opinion 40:25 134:16,19 opportunities 53:12 opportunity 137:15 option 108:24 order 26:11 29:19 40:11 59:25 75:18 75:24 76:12 81:19 106:18 114:14 175:1 ordering 52:18 orderly 122:11 131:21 132:6	134:10 135:3,21 136:6 159:24 organized 34:16,23 35:4 97:15 orientation 29:22 31:22 148:3 158:10 original 13:9 30:10 60:22 66:16 originally 106:23 other's 174:22,23 outcome 61:24 64:5,6,24 65:5 66:5,24 190:11 outcomes 66:1 127:21 outlined 31:19 outside 32:4 78:1 84:9 130:18 133:22 138:16 141:4 164:22 overhead 122:16 overlapping 78:5 oversight 18:4 65:16	131:17 133:24 142:15 147:20,22 148:19 150:20 151:10 152:5,17 153:4,20 160:1 161:12 164:4 166:16 170:8,11 178:6 181:21 183:7 186:2,17 pages 3:5 11:19 38:24 42:5 43:7 44:24 104:5,8 141:16 154:4 181:4 paid 84:20 103:2 103:19 139:25 143:9 144:19 146:4,12,21 150:22 162:15 169:7 171:3 172:19 177:14 178:12 185:6,15 187:3 paint 135:1 painted 135:4 Panel 3:16 58:24 105:7 paper 76:7 papers 122:13 133:10 134:11 137:22 138:19 paperwork 68:6 paragraph 128:20 paragraphs 125:2 paralegal 20:25 21:11,20,22,24 Pardon 159:14 parrots 160:3 part 21:23 34:20 36:8 43:1 48:12 51:14,15 52:24 79:8 84:14,17 87:25 88:2 90:15 90:18 91:15 92:8 102:13,24 104:16 123:21 124:16,20 124:23 127:4	128:6,16 129:24 131:10 137:10,11 152:1,12,25 153:10,13 155:6 160:16 162:6,12 179:16 part-time 20:25 participant 153:16 175:10 participants 121:1 144:15 163:18,19 165:9 177:15 181:16 182:15,18 184:5 187:2 participate 36:14 36:17 37:6 39:19 97:20 98:5,9 120:5 158:15 180:22 participated 145:25 180:14 182:1 participating 185:16 participation 23:9 153:1,10 184:2 particular 142:13 parties 4:12 190:7 190:10 parts 120:1 122:6,9 pattern 113:13 pay 96:23 150:25 161:18 170:20,24 171:7 172:19 184:17 185:18,20 paycheck 22:10,13 paying 171:20 PBNDS 27:10 39:4 39:15,18 40:23 58:11 90:6,9,12 90:12,13,19,23,24 91:3,8 106:24 107:7 116:8 121:11,12 122:2,5 123:7,14,15,18,22 124:7 125:10,22 125:23 126:2,6,17
--	--	--	--	---

126:18,23 127:14 130:4,7,24 131:3 131:8,15 132:1,5 132:9,19,24 133:24 134:20 135:6,12,18 136:2 136:9 139:15 141:8 146:8,19 147:18 148:12 155:1 160:4,18,20 160:25 161:1,7,18 161:22 162:6,12 162:20 167:22 168:3 peace 55:16,22 pen 169:11 penalties 52:12 pending 7:12,13,15 56:24 60:2 106:21 109:21 Penthouse 2:17 people 14:1,8,22 16:8 18:7,10,13 18:16,20 19:10 20:2 28:6,6,21 33:22 38:11 49:1 49:9,17,20 50:14 55:15,17,18,21,24 61:5,10 64:20,22 66:19 67:4,17 69:7 74:2,2 81:13 81:25 82:3 84:20 94:13,23,24 99:19 99:22 101:4 113:23,25 118:9 118:25 120:5 145:18 162:15 163:13,21,23 164:13 168:8,10 169:12,14,14 172:19 174:11 177:1,3 179:12,24 180:5,12,14 182:1 Perera 2:9 perform 24:10 65:17 94:18 123:5 132:8 141:4	152:12 153:10 168:11 Performance- 122:20 Performance-Ba... 27:10 29:4,10 121:5 124:4 140:21 155:7 performed 44:13 92:16 93:9 94:25 101:18 102:2 107:18 151:1 performing 46:21 46:23 92:13 93:8 94:2 100:10 168:8 173:24 performs 46:16 65:12 94:17,25 100:6 101:22 102:4,7 period 16:2 22:5 61:3 70:16 120:21 120:24 144:14 176:12 periodic 61:12 periods 56:6 permit 126:23 permitted 132:7 person 6:17 16:11 28:6 46:14 55:3 60:22 62:3,7 63:5 63:8,8 64:2,2 68:8 68:18 69:24 70:22 75:11,12 81:1 83:21 98:7 99:9 99:12,25 104:15 107:15,22 108:23 109:25 114:10 123:22 151:18 161:14 162:21 171:1,15 person's 55:13 101:9 personal 10:16 25:10,23 39:6,14 39:20,23 121:22 122:3,6,22 123:9	123:10 127:13,23 128:2 129:15 130:5,13 134:5 140:5,8 160:9,12 181:22,24 182:11 phone 75:25 113:5 phones 133:6 134:14,21 phrase 161:9 phrased 137:24 phrases 114:1 physical 20:14,14 73:2 physically 78:11,19 78:23 79:2,4 pick 102:10,12 113:4 pictures 24:24 25:7 48:1 122:15 piece 138:16 145:1 pieces 27:9,11 PL 82:23,23,23 89:1 116:1 PL000051 3:14 PL000055 3:14 place 24:15 85:21 87:1,2 111:8 147:15 190:7 placed 39:2 55:11 55:14 60:5,5 67:4 67:17,24 111:1,19 119:1,4 placement 59:20 placing 59:25 111:23 plaintiffs 1:7,13 2:2 4:21,24 5:2,4 87:19 104:9 105:10 124:18 151:12 plaintiffs' 4:9 32:12 188:12 plan 41:23 42:4 45:18 95:15 100:18,22 101:1,7 159:7 160:22 166:3 168:12,15	168:23 169:19 170:7 plant 20:14 play 40:6,6 played 23:20 plays 102:8,13 please 9:3 24:11 27:8 43:21 58:21 87:14 96:5 97:11 103:25 147:20 151:11 152:18 153:5 155:16 186:3 188:10 pleasure 151:5 plug 82:19 pod 67:24 68:9,19 79:6 81:13 133:22 173:9 174:11,12 pods 26:7 67:6,19 173:22 point 7:7 56:1 104:5 118:23 127:10,10 140:1 172:15 pointing 98:13 149:21 158:10 181:3 policies 23:21 31:1 33:12 41:17 42:10 42:12,15,18 43:11 49:21 52:13 79:20 80:13 115:12 119:19 141:12 166:15,15 policy 3:11,20 23:10,15,18,24 24:2,3,7,10,12 25:9 27:7,8,9,12 27:14 28:7,10,12 28:14,15,18,25 29:5,13,17 30:6 30:17 31:9,19 32:3 33:10,25 34:2,21 35:13,21 36:22 37:5 38:1 41:12,13,21 42:19 43:2 44:21 45:2	45:13,18 47:6,15 47:19 48:13 50:15 50:19 51:1,4,12 51:22,25 57:15,18 59:22 62:25 63:1 63:7 64:2,17 66:22 69:7 70:22 79:21 81:2,8 84:6 84:13 85:16 88:11 88:22 90:4,11 92:16 93:10 94:9 94:16,19 95:1,3,5 95:11 96:9,14,14 97:13 98:4,22 100:8 115:8 125:4 126:1 129:1,3,8 129:14 130:17 134:20 146:9,16 148:8 149:15 150:8 158:25 159:6,17 160:22 162:6 166:2,16,23 166:25 167:20,21 175:25 176:6,7 187:1 pool 179:10 pop 54:18 popular 56:4 population 54:2,7 56:11 118:7 163:9 populations 49:14 pose 81:12,24 poses 82:7 position 13:4 17:25 22:8 46:12 140:11 140:16,23 141:3,5 142:13,13 143:6 150:4 172:4,7 positions 23:9 139:25 143:9 144:19 146:4,13 180:13 possibility 179:15 possible 100:3 151:20 184:25 possibly 85:6,7 post 29:25
--	--	---	--	--

posted 36:16 83:25 83:25 84:1 97:22 98:16	printed 76:3 183:11	153:1,11,14,23 154:8,25 155:5 156:10 157:22 158:16 161:1,15 161:21 163:6,18 163:19,25 164:15 165:10 166:15 168:9 175:11,13 176:9,17,22 177:4 177:7,14 179:5,13 179:19 180:13,15 180:22 181:16 182:2,19 183:1 184:3,4,18 185:17 185:22 186:13,18 187:3	providing 10:17,25 41:3 80:12 173:3	135:12,25 137:2,4 137:17,18 139:7 143:14 146:11,23 147:9 157:11 174:15 185:10 187:7
potential 52:12	prior 119:4,21 151:6		provision 76:12	
potentially 85:4	privilege 9:10,14 74:11,13 76:23		psychiatric 119:1	
PowerPoint 29:22 30:3,5 31:24,25 51:16	privileges 105:22		Public 1:14 189:19 190:4	
practice 90:11 148:9 149:5,11,15 150:2,8 175:17	probably 7:2,20 21:4 50:6 65:3 106:10 185:18		pull 75:21 76:2	questions 24:5 34:10 39:11 66:13 87:15 137:15 155:16 188:12 190:9
practices 119:19 121:21	Procedure 3:11,20 4:3 5:10		punitive 57:9	
preceded 122:9	Procedures 166:24		purpose 34:9 51:18 53:2 55:7 56:18 56:19 57:1,5 91:21 117:24 143:4	quiet 55:16,18,22
precision 164:13	proceedings 4:1 89:15 188:17 190:9		purposes 28:3 55:15 62:12 74:1 74:10,14 125:13	
predecessor 12:25 34:3	process 59:19 71:14 94:5 104:16 108:22	program/detainee 160:22	pursuant 1:12 4:2 43:10 45:17 66:21 84:5 172:19	<hr/> R <hr/>
prefer 31:10	Processing 3:11 157:4,24	programs 18:6 35:22 93:24	put 27:13 28:7 30:10 33:20 36:2 48:1,1,9 55:12 56:23 67:14 69:7 69:20 70:7,20 80:21 81:3 105:23 106:22 107:2 109:8 113:10 155:14 166:5 169:11 184:20	R 2:1,3
preparation 170:15	produced 145:11 151:12	prohibited 105:13 108:3,6 110:12	puts 80:20 88:9 120:19 181:11	randomly 60:8
prepare 11:5 181:14	production 104:9	promise 175:2	putting 118:11	rate 176:11 178:1 186:14,21
prepared 5:22 11:23 92:11,20 93:4 178:5	Professional 1:14 190:4	promoted 14:13 19:8		read 35:3 49:8 92:18 100:14 104:4 122:25 130:4,4 189:2
present 4:18 72:11 119:23	proffer 124:15 156:3	promotion 19:5 21:4		reading 58:19 105:19 139:15 161:9 190:16,17 190:18
presentation 29:22	program 3:18,20 28:20 34:17,24 35:1,5,6,8,12,20 35:23 36:2,5,14 39:3,15,18 46:11 46:15 48:17,19 84:10,13 97:15,21 99:9,25 119:20 120:3 121:2,7,13 123:6 125:20 127:8,16 128:17 129:7 130:19 135:10 139:24 142:11 143:10 144:16 146:1,7,10 146:17,25 147:6 147:25 148:13 149:7,10 150:9,13 151:19 152:2,13	property 45:9 81:13 167:10 168:5		ready 39:10,12 83:23 155:16,17 177:1
presented 142:10 143:24 144:1,23 145:4		protective 55:10,11 55:12,15 75:18,24 76:12 119:5		realized 76:6
presents 142:23		provide 10:20 31:11,13 59:10 67:16 74:18 181:14		really 55:18 96:18 105:22 112:6 129:6 139:13 147:8 165:5
Presumably 68:8		provided 6:5 29:17 29:19 31:1,7,23 31:24,25 32:11 42:8,10,12 65:5,7 65:23 88:4 100:16 110:22 128:8 156:4,13	<hr/> Q <hr/>	realm 84:9
pretty 91:5,7,9 94:6 105:20 120:16 165:16 168:3		provides 30:16 122:2 131:22 153:14	qualifications 46:11,25 108:13	reason 8:9 88:24 114:17 187:17
prevent 76:5			qualified 12:19	rec 80:17 117:10
preventive 19:22			quarter 61:4	recall 6:11 10:2 11:12 17:21 65:1 69:22,23 70:6,7,8 71:12 119:19 125:21 130:19 184:23 187:19,25
prevents 76:12 79:5			question 7:12,15 8:6,10,11 9:2 17:15 28:3 35:14 43:23 50:23 51:9 51:24 57:1,3 61:8 66:16 67:21 84:15 92:7 96:1,15,16 97:8 102:6 114:1 115:19 123:14,25	receive 22:10 29:23 29:24 31:5 62:19
previous 32:25 43:6 46:3 109:19 125:1 156:12 190:5				
principle 138:25 139:1				
print 76:3 106:13				

65:9 142:14 150:21 184:17 received 22:13 67:11 70:14 88:22 110:21 151:20 receives 65:8 Recess 72:10 116:16 175:7 recognize 32:20 39:1 41:8 42:24 44:24 83:3 87:22 104:24 108:1 109:2 141:17 142:16 152:6,18 153:5,21 154:17 177:17 recollection 100:17 record 4:13 7:22 9:7 72:9,12 75:7 110:4 114:25 115:1,3,4,21,23 115:24 116:10,14 116:17 175:6,9 182:14 188:4 records 60:10,19 62:4 93:21 recreation 53:13 53:25 73:15 78:1 78:2,3 redacted 105:20 124:18 reduced 190:8 refer 15:18 26:9 28:14 REFERENCE 3:6 referred 84:16 106:20 referring 27:25 41:14 89:2,10 95:2 107:12 110:17 184:10 185:21 186:20 refers 126:15 reflect 68:10 126:16 reflecting 33:11 182:17	reflection 115:12 refraining 122:15 134:12 137:23 refusal 67:5 89:3 refused 67:24 refuses 51:3 81:7 refusing 52:4 66:20 regarding 10:20 26:22 30:16 92:13 93:7 105:9 115:7 119:20 regards 93:25 119:19 Registered 1:14 190:4 regular 36:19 37:11 51:7,19 54:1 regulatory 125:4 126:1 reimburse 186:23 reiterates 127:14 relate 107:25 related 190:10 relation 190:6 relay 174:7 release 105:5 releases 180:18 reliable 67:12 remain 179:10 remaining 175:2 remains 31:15 remember 6:4,12 6:23,25 10:2 11:13 30:20 104:16 116:21 144:13 188:2 removed 64:7 150:15,16 151:5 repeat 43:21 155:3 rephrase 8:18 78:14 124:2 157:11 report 19:20 61:12 64:21 70:9,11 109:3 111:7 reporter 1:14 4:12	4:14,15 7:22 8:4 71:23,24 72:2 188:8 190:4 REPORTER'S 190:1 reporting 63:17,23 69:2 reports 61:2 69:14 represent 32:10 representation 43:9 representative 29:2 67:16 112:18 request 3:4 55:10 55:14 71:6 142:21 143:25 144:6 156:5,8 requested 190:16 require 64:24 66:11 126:23 134:14 136:10 138:1,18 139:10 139:15 140:7 required 15:16 37:6 39:7 49:3 84:22,25 111:7 119:3 121:16,23 122:10 124:6 127:12,23 128:22 129:1,9 130:18 131:7,20 134:9 135:7,13 159:23 160:6,9 190:18 requirement 39:14 39:20,23 80:23 81:1 90:24 122:23 140:6 141:4 requirements 27:10,13 38:7 41:16 124:13 requires 24:9 48:13 61:24 126:5 135:21 requiring 65:1 resolve 71:7 resource 93:22 resources 18:15	93:21 response 185:2,17 responsibilities 13:23 14:18 15:11 16:22 85:23 152:11 167:5,14 responsible 16:1,4 16:23 17:17 18:4 20:16 23:14 30:12 31:20 36:18 41:17 43:14 45:7 47:17 64:12,21 83:22 84:4 122:2 123:9 123:22 134:5 156:20 167:8 rest 40:14 92:25 166:13 restatement 127:20 restrained 78:11 78:23 79:2 restrict 116:3 restricted 54:3,4 restroom 7:8 restrooms 101:14 reverse 181:7 reverting 160:14 review 23:24 24:2 28:10,12,14,18 29:21 30:18 33:25 33:25 34:2 41:15 42:1,1 63:7 87:13 155:15 166:9 182:17 reviewed 28:15 33:7 85:22 100:12 reviews 111:17 revised 103:17 144:4 145:17,19 154:9,13,14 167:1 right 5:24 7:19 13:11 14:25 15:1 16:13 21:5 23:4 30:13 32:14 35:6 36:6 37:12,23 38:1 39:22 40:14 40:17 43:4,15,19 44:5,6 45:14,19	45:24 46:23 47:20 49:8,11 50:9,15 52:8 54:20 56:2 57:20 58:9 65:6 67:19 68:6,11,14 72:8 73:14,15 76:20 77:15 78:9 79:6,23 80:13,18 80:24 84:1,10 85:11 86:14,18 88:11 89:6,9,12 89:17,22,24 90:2 90:19,25 91:4 92:4,21 93:5 94:9 95:23 97:25 98:20 101:25 102:19 103:1,7 104:12 105:11,17,25 107:16,22 108:4 109:14,18 110:14 112:7 114:16,20 115:14,22 117:16 121:14 124:22 125:14 126:6 128:9 129:16,24 130:7,8,14,24 131:8 132:1,15,23 134:7 136:15 140:1,9 141:13 145:22 146:3 147:6 150:5,10,16 150:17,23 151:1,8 151:22 152:3,23 153:2,11,17 154:5 158:12,19 159:17 161:1 164:10 165:11 166:19 167:14,16,22 168:5,23 169:11 169:20,24 170:4,8 171:10,14,17,19 171:20 172:7 173:14 174:1,13 174:20 175:1,21 176:10,18 179:16 179:21 180:2,9,16 180:20 181:9
---	--	---	--	--

182:11 183:2,10 183:11 186:6 right-hand 46:6 73:9 82:22 95:20 116:3 127:20 128:16 144:10 156:7 159:10 167:2 186:5 rights 88:10 149:17 149:25 risk 118:3 road 7:5 role 13:2 16:3 23:20,23 102:8,13 102:22,24 rooftop 19:25 room 4:18 36:25 45:10 83:2 116:19 128:15 130:9 138:13,14,17,18 151:2 152:15 156:1,25 167:10 rotate 39:1 roughly 15:1 16:10 103:1 121:1 rounds 69:15 71:4 row 44:17 95:19 rule 1:4,12 57:8 60:2 rules 4:2,11 5:10 7:5 9:7 79:10 109:21 110:2 121:7 run 146:9 147:16 running 20:8	23:10 24:6,10 25:9 27:7 29:13 30:6,17 31:9,18 32:3 33:12 34:14 34:21,22 35:10,13 35:21 36:1,11,14 37:25 41:11,20,25 42:19 43:2 48:13 49:20 50:19 51:1 51:4,7,22 57:18 66:21 69:6,16 70:22 79:21 81:2 81:8,23 84:6,13 92:16 93:10 94:9 94:15,18 95:1 96:9,14,15,17,20 97:13,21 98:3,21 100:8,25 101:2,3 101:6,18 102:1,13 115:7 129:3,14 130:17 131:7 141:12 142:5 151:14 152:2,21 153:6 164:3 166:16,24 167:5 167:14 175:13 176:7 sat 137:25 Saturday 165:6 saved 106:8 saw 69:23 saying 8:5 27:24 40:15 58:1 61:16 75:14 123:7 138:7 138:12 147:8 162:5 172:9 185:15 says 30:21 33:1 34:13 36:10,13 37:10 39:6,25 42:5 43:24 45:6 46:5 57:14 75:24 82:23 97:14,19 98:4 124:12,25 125:6,10,11 126:2 127:7,11 128:17 128:20 129:9	130:8 131:3,4,6,9 131:15,20,22 132:3,5,13,14,16 132:21 133:24 135:19 136:17 137:21 138:6 140:17 143:9 144:7,19 145:23 146:15 147:24 148:2 150:21 151:4 154:19 156:18 157:23 159:22 160:8 161:4 167:7,16 177:21 178:7,11 178:24 183:12 186:7,10,18 schedule 43:4 45:17 Scheduled 43:18 43:24 schematic 74:18 schematics 74:4 scope 92:17 94:14 124:5 scrubbing 48:4 SDDOs 112:21 search 113:17 seats 73:13 second 7:19 35:3 41:18 43:22,23 52:11 65:8 77:10 123:20 128:20 146:9 147:22 157:23 179:16 183:7 section 26:18,18,19 26:20 34:10,11 39:6,24 45:4,6 88:7,7,15 96:3,5 97:13 121:20,20 121:22 123:7,13 124:12 125:1 126:15 127:7 128:3 131:15,19 158:10 160:6 167:4 186:6	sections 10:21 100:20 126:16 security 17:24 18:18,24 28:21 64:15 69:3,13 73:21 74:1,10,14 106:4 112:8 174:1 175:19 see 33:9 34:10 35:25 36:9,20 39:5 43:4 44:2 45:4,6,10 46:6 52:17 53:18 59:8 60:15 66:24 69:14 76:15 93:16 96:8 96:12 100:19 102:9 105:13 107:12 108:9 109:9,22 121:8,23 122:3,7,17,20,23 124:8,12 125:2 127:7,13 128:16 128:23 131:12 132:19,21,24 133:2,2,5,9,23 138:9,11 143:5,8 144:18 146:3,5,16 147:24 148:5 149:18 154:10 156:7,17 157:5,8 157:15,16 158:24 159:3,22 160:4 161:4 164:4,24 165:2,7 167:1,4 167:11 174:6 177:23 178:7,11 178:14,19 183:4,8 186:8 188:8 seeing 70:9 76:13 119:12 184:24 seen 11:22 12:1 30:9 60:3 65:20 69:20 91:16 100:22 119:3 177:18 seg 52:19,21 55:14 67:14 69:21 79:14	111:1,16 113:10 117:22,22 segregation 52:22 52:23 53:5,9,11 53:16,19,23 54:5 54:9,11,12,13,16 54:19,20,25 55:2 55:4,8,22 56:12 56:13,15,17,18,24 57:2,6,7,13,19,23 58:8 59:2,8,21 60:1,6 67:5,18,25 69:8,10 70:21 71:10,15 72:17,17 73:3,4,10,11,17 76:15,17 77:7,17 77:19,22 78:24 79:14,23 80:7,22 85:11 89:22 105:10,17,24 106:17 107:11,16 107:22 109:18,21 111:8,19,24 113:18 114:4,12 114:14,15,18,19 117:3,6,8,15 118:12,13,18 119:2 selected 108:14 selection 175:12 semantic 130:2 send 68:5 111:11 sends 62:23 sense 126:2,17 174:8,17 sent 63:2 112:1 183:24 sentence 35:3 107:4 122:10 137:10,11,25 138:3 160:3 separate 11:19,21 13:10 20:21 25:18 30:3 31:1,8 35:16 39:14 45:16 52:24 52:25 65:17 78:6 78:7 133:12
S				
S 2:1 safe 117:25 180:20 safety 16:17,25 19:15 41:24 55:13 60:9 81:6,13 82:8 158:16 Sanchez 3:22 sanctions 89:13,20 116:2,7 sanitation 3:12				

178:11 separately 98:3 September 154:13 sergeant 13:22,24 14:9,11 serious 81:12,22,24 serve 13:4 14:11 15:8 18:23 151:4 served 16:2 58:4 serves 69:19 service 15:21 37:3 37:17 48:25 49:2 51:11 81:19 83:11 140:10 164:17 170:16 services 92:18 172:6 173:3 serving 70:16 set 24:5 66:8,9 79:24 100:8 102:23,24 103:3 146:19 186:21 sets 41:15 66:6,10 156:16 167:13 186:14 setting 121:6 seven 105:17 shave 174:22,23 sheer 49:17 sheet 66:4 150:25 158:11 sheets 48:25 Shelby 2:15 5:5 shift 14:3 44:1 83:21 86:12 98:8 164:23 165:4,5 shifts 164:21 165:5 179:1,18 181:7,9 short 56:6 120:16 176:12 shorter 159:20 shorthand 190:7 show 96:5 103:14 161:25 177:9 shower 117:20 shown 47:6 shut 78:15	sick 9:20 side 6:18 32:19 53:11,17 55:5 56:24 57:23 59:8 60:6 73:9,10,16 77:15,17,19 95:20 159:10 173:19,21 sign 88:20 145:6 149:22 150:25 signature 31:15 144:11 148:19 149:19 159:8,11 188:16 189:11 190:13 signed 23:5 28:16 145:5 149:6,16,20 149:22 150:1 151:18 158:15 187:6 Signing 190:16,17 190:18 signs 28:25 31:14 59:25 88:21 similar 69:1 92:15 93:9 94:15 100:6 155:21 173:24 Similarly 8:20 166:13 single 37:23 44:8 55:1 59:18 67:13 75:11,12 99:16,17 172:24 sink 45:9 167:9 sinks 132:22,25 134:15,22 168:4 sip 7:8 sit 59:6 site-specific 27:13 41:11 159:6 166:2 166:15,23 sitting 144:2 185:12 situated 59:7 situation 54:17 161:14 six 14:17 65:3 skylights 48:7	slammed 118:20 slide 87:12 slower 176:22 small 73:14 smoothly 20:9 social 53:25 54:8 54:14,15 59:4,14 77:22,25 78:5 80:17 117:3,5,7 socialize 54:10 solitary 79:15 85:7 113:20,21 somebody 46:10 54:8 55:14 57:25 60:14 67:14 70:7 95:22,25 106:21 111:15 135:10 154:21 176:24 184:11 sorry 17:6 21:18 68:3 86:6 87:11 90:7 97:2 127:17 127:18 185:10 sort 7:23 9:25 20:6 35:15 60:19 136:8 146:8 151:7 175:25 182:14 sought 118:25 sound 49:11 128:9 sounds 25:22 91:18 source 67:16 sources 28:7 96:7 South 2:16 space 98:22 145:18 Spanish 30:25 31:2 31:7,11,12 speak 12:3 speaking 12:11 41:1 173:8,12 175:22 special 3:15 124:12 147:11,12 161:13 161:17,25 162:15 162:21 specific 52:20 66:25 120:1 124:9 129:24 157:19	specifically 130:12 141:25 184:7 specifics 52:17 70:8 specify 63:1 83:11 93:11 spend 57:12 spent 107:22 130:16 spot 150:13 spots 146:25 springing 80:1 ss 190:2 stacked 177:1 stacking 122:13 134:11 137:21 138:19 staff 13:17,17,25 14:21 15:13 27:24 34:5 36:15 42:12 42:14 81:14 97:22 102:11,11 169:16 staffing 100:18,22 100:25 101:7 168:12,15,23 169:19 170:6 standard 29:10 121:6,11,13,17 122:21 148:13 155:7 standards 17:3,4,9 17:14 27:11 29:4 33:24 34:14,18,25 97:17 124:5 125:17 140:21 147:17 148:24 156:15 standing 169:22,24 start 60:6 83:7 136:20 141:16 159:1 185:11 started 33:23 65:1 66:17 87:3 97:4 120:2 187:23 starting 172:15 state 4:6 6:10 189:13 190:2,4 stated 56:20 98:10	99:1 117:7 129:4 187:20 statement 39:16 91:17 92:2 100:12 100:15,17 STATES 1:1 station 73:14 status 151:6 statutory 125:4,25 stay 120:16 176:12 176:13,14,20 staying 24:15 Stelter 62:8 sticks 33:10 Stipend 186:18 stipulate 123:18 stipulated 75:18 stipulation 138:21 stop 109:23 Street 1:13 2:6,9 4:17 stretching 50:8 strike 31:4 47:5 stripper 138:15 stripping 138:23 139:18 struck 154:21 structure 20:15 stuck 138:21 studies 21:9 stuff 99:3 138:20 163:1,10,15,22 subject 10:9 27:6 38:7 49:20 50:14 103:23 subjects 5:23 10:8 12:8 submitting 71:14 subscribed 189:12 substance 154:5 substantial 47:15 suffer 57:19 suicide 118:1,3 suitable 75:7 Suite 1:13 2:7,10 4:17 summarizes 152:10
---	--	---	--	---

summary 152:23 153:9 183:11	sworn 4:6 189:12 190:6	119:14 175:7 190:7	template 106:12 156:9	104:4 123:16 171:11
Sunday 165:7	system 26:14 68:23 86:25 87:2	talk 8:3 12:23 56:16 71:5 119:16 120:22	temporary 162:2	things 28:13 30:1 35:16 57:18 63:9 63:16 64:22 74:6 88:2 90:22,24 93:25 101:4 103:24 114:22 125:24 129:13 130:5,7,12,22 131:15 132:15 134:13 135:7,13 137:24 138:3,23 138:24 140:7 141:5 145:7,9 151:25 163:4 167:22 168:2,3 170:22 187:25
supervise 18:14 19:10 22:19,20	systematizing 63:7 63:16 64:1	talked 89:21 97:17 129:2 130:10	ten 49:13,25 50:3	
supervised 14:2,8 14:23 34:16,24 35:4 97:15	systems 19:23,24 20:8,10,12 60:10 60:19	talking 9:8 20:11 22:18 25:24 27:22 51:6,12 72:16 75:14 78:8 86:7,9 92:8 96:20,21 97:12 104:13 120:23 130:1,17 151:7 155:19 163:17 167:13 170:18,20 184:8	tend 145:18	
supervises 19:17	T		Tennessee 2:4	
supervising 13:25 14:19,20,20 18:8 169:20 170:3 173:16,25	tab 5:13 32:5,7,10 32:14,15 41:5 82:20 87:12 95:6 97:5,6 103:10,25 104:1 116:1 119:18 121:5 124:11,11 127:2,3 127:4 128:6 129:13 141:17 142:16 151:11 155:14 158:20,24 159:2 161:23,24 165:24 166:14 170:9,10 177:10 182:23,24 186:2 186:17	talks 47:23 96:4 185:23	tenure 12:22	
supervision 19:9 20:20 47:2 138:17		task 101:18 102:1	terminology 8:17	
supervisor 16:16 149:9		tasks 24:21 31:19 31:21 43:17,25 44:13 46:16,22,23 101:23 102:4,7 129:14 130:24 131:23 132:7,20 153:9 167:24 168:12 173:13	terms 7:4 8:17 17:19 49:17 101:12 122:6 149:14 180:13,14 182:10 184:1	
supervisors 22:20		technical 29:2 112:17	testified 4:7 88:3 110:17	
supervisory 112:22		telephone 112:2,4 112:11,12	testify 5:22 10:8 12:20 55:23 92:12 92:20,23 93:4 99:16 190:6	
supplement 29:23 51:16 88:1 128:11 128:12	table 44:8 73:14 95:19	television 40:5 53:18,24 59:11	testifying 10:14,15 144:13	
supply 38:21	tables 37:2,2,3,4 44:19 59:5 73:13 99:4 131:4 133:13 133:25 134:14,21 136:13 140:9	televisions 73:16	testimony 9:12 10:17,20,25 40:22 41:2 49:4 51:23 72:18,23 77:8 115:7 116:22 125:12 132:4 134:3,7,19 137:13 160:11 173:22 181:15 186:16 187:10 189:4 190:9	
supposed 48:2 76:15	tagged 174:4	tell 8:11,18 9:4 33:9 51:8 58:20 61:13 63:23 69:7 93:12 96:2 100:9 114:13,15 121:12 144:5 166:20 170:4 181:2 183:22	thank 9:19 21:20 71:21,24 72:13,25 76:25 96:19 111:5 115:16 119:16 124:2 127:1 141:15 149:21 151:24 174:8 183:21 185:13 188:15	
suppression 16:24	take 7:7,9,14 9:22 10:11 19:11 27:12 28:6 32:5 38:24 39:9 41:18 47:24 52:17 62:14 72:8 87:7,13 95:4 116:9,11 123:2,20 149:8 155:14 175:4 185:25	telling 11:4 72:7 98:6 113:7 140:6 147:15 172:17,23	Thanks 73:6 96:23 116:15 149:4 175:5	
sure 17:15 20:16 23:12 25:5 33:3,9 43:6,22 61:15 69:18 72:1 84:9 88:25 91:5,7,9 93:12 102:6 117:10 118:1 120:22 126:10,12 129:22 130:3 131:2 132:18 137:19 139:23 150:14 151:21 157:20 158:5 162:7 164:18 175:20	taken 1:13 4:2 56:22 72:10 79:22 91:8 116:16	tells 134:4,8	threat 81:12,25	
surfaces 95:18 131:6			threats 55:12	
surprise 80:2			three 17:2 20:4 28:7 42:5 49:1 65:7,20 68:22	
suspended 21:1				
sweep 37:4				
sweeping 99:4				

119:21,23 164:21 three-year 120:23 thrown 118:10 thumb 107:8 109:22 tie 129:6 tied 90:15 tier 73:8 77:1,6,10 77:11,12 tiers 73:8 76:5 85:17 86:7 time 6:12 8:4 14:4 15:21 17:9,12,16 18:11 21:23 22:5 23:8 37:12,18 38:12 53:16,25 54:6,8,14,15 56:7 57:12 58:3,4,7,7 59:1,4,9,12,12,14 61:3 62:20 64:24 67:13,23 69:25 70:4 72:11,14 75:7 77:22,25 78:2,3,5 80:17,17 83:1 88:15,18 95:4 99:16,23 105:3,4 109:9,12 111:16 113:4 114:20,21 117:3,5 117:7,10 119:22 120:14,18 128:15 130:9,16 137:6 144:9 150:16 151:2 152:14 156:1,24 165:6,19 166:6 175:2 180:13,17 188:13 190:7 times 6:7,21 23:22 34:15 46:9 47:23 57:24 71:4,7,13 99:11 111:13 118:14 145:7,18 164:7 tired 9:17 title 12:17 108:5 titled 108:3 159:6	160:6 166:3,24 today 5:22 7:5 9:18 10:8 11:1 38:16 116:22 129:3 132:4 134:3,7 187:10 today's 11:6,9,14 11:23 12:4 47:11 82:15 104:1 158:21 187:18,23 188:3 toilet 45:9 167:9 toilets 168:4 told 20:6 26:23 31:20 55:20 68:4 92:19 95:15,16 97:12 121:10 137:25 154:24 155:4 179:8 181:19 182:6 187:22 toothpaste 47:25 99:2 top 33:1 43:4 47:16 70:2 124:12 128:17 142:3 147:24 154:20 156:17 157:3,23 159:8 164:16 167:1 170:7 178:17 topic 10:9,21 24:6 35:19,20 93:19 94:12 119:17,19 181:15 topics 11:1 12:20 15:16 35:16 total 73:8 96:14,15 177:13 178:14,25 179:6 182:10,14 totaled 183:6 Tower 2:17 track 66:1 tracks 162:6,12 train 15:13 64:20 trained 16:9,12 108:14 141:8	training 13:15,17 15:5,8,12 16:2,5,6 16:6,16 64:21 93:25 140:20 153:18,19 158:16 transcript 7:24 58:20 188:9,11 190:8 transcription 189:3 transfer 90:2 trash 25:11 101:13 102:10,12 traveling 69:12 treatment 119:1 true 108:15 116:24 143:12,16 187:15 189:3 190:8 trustee 46:5,10,13 46:15 47:1 99:8 99:14 108:8,13,14 141:24 142:1 trustees 99:18 162:18,19 163:24 truth 4:6 72:7 190:6 try 8:6,18 61:17 84:19 172:10 182:13 trying 25:20,25 35:15 47:12 137:7 172:13 174:7 turn 32:7,18,19,25 36:8 39:5 41:5 44:23 64:16 89:1 93:13 95:8 98:12 103:25 121:19 124:11 125:7 141:15 142:15 151:10 152:17 153:4 154:16 158:20 160:1 165:23 178:6 186:2 turnaround 58:5 Turner 2:8,9 5:1,1 71:22 72:6,11 83:1 116:9 151:2	152:14 156:1,24 turnover 120:15,15 176:8,11,16,17,21 176:23 179:9,21 180:5,8 181:8 TV 53:12 55:18 59:1,5,6,8,12 TVs 37:1 48:3 59:7 77:14,16 twice 177:18 two 6:14 10:1 18:19 22:4 31:8 35:22 54:9 58:5 66:5,10 73:8,13,14,15 77:22 78:4 91:11 117:3,13 154:4 156:16 164:18 165:5 type 12:12 38:9 43:10 47:25 60:10 106:12 107:2 110:16,20 113:17 141:25 143:6 152:8 155:18 typed 105:24 106:2 106:2,5 153:22 types 168:3,10 typewritten 190:8	93:19 94:17 99:24 100:5 102:23 104:21 107:8 110:23 111:18 123:25 124:3 126:13 128:1 129:19,22 130:3 131:2 137:8 138:8 138:12 139:13 141:7 146:11,23 150:14 161:16 162:7 168:18 169:15 172:9 173:22 174:1 179:22 understanding 5:20 9:7 10:7,12 10:19,21,24 11:2 35:4,24 39:17,22 40:22 47:5 49:15 49:21 76:4 77:7 90:10 91:20 109:16 128:25 177:25 184:13 understood 8:12 55:23 uniform 85:16 uniformly 140:24 141:6 184:4 unique 128:12 157:18 unit 3:16 23:10 24:6,10,17,19 25:9 26:10,13,13 27:1,2,4,7 29:13 29:25 30:1,6,16 31:8,18 32:2,4 33:12 34:20 35:9 35:12,25 36:1,6 36:10,18 37:25 38:2 40:16 42:19 43:3,15 48:13,20 50:18 51:1,4,22 52:25 53:5,20,23 54:12 55:5 57:18 58:22 60:13 66:21 69:6 70:21 71:10
---	---	---	---	---

71:11 73:7 77:7 79:20 81:2,8 84:5 84:12 92:16 93:10 94:9,15,18 95:1 98:3,21 99:8 100:7 115:7 116:4 119:6 129:3,14 130:17 133:1 138:10 141:21,24 142:2,7 143:1 146:21 163:21,23 164:19 168:21 173:14 175:12 UNITED 1:1 units 19:25 20:12 25:18 26:1,2,4,6 26:18,19,25 54:18 55:1 163:16 University 21:18 unlocked 40:19 unpaid 147:9 updated 45:1 updates 30:14 upkeep 19:22 20:5 20:7 upper 28:22 USD 186:7 use 7:7 22:17 26:9 26:13 32:16 47:25 60:11 76:4 85:21 113:21 114:1 175:1 184:14 usually 28:19,21 41:24 44:16 48:16 56:21 58:5 64:10 69:3 83:17,20 84:1 99:12,13,17 111:11,21,25 112:15 113:11 161:17 164:18 184:11 utilize 77:9 utilized 143:5	vacuum 101:13 135:22,24 136:3 vacuuming 135:21 value 92:18 172:5 172:13 173:2 variance 63:8 varies 26:5 62:14 112:6 120:8 165:6 Various 15:16 vary 55:9 Vaughan 2:16 Venn 173:19,20,21 173:23 vents 44:15 95:18 verbally 113:6 184:21 verbatim 160:17 verbiage 133:4 verify 10:12 107:24 158:5 version 29:3,9 45:1 153:22 versions 83:9,14 91:11 153:25 158:25 versus 73:3 163:18 video 29:22 30:3,9 viewing 36:16 97:22 VIII 88:7 violate 80:23 violated 42:19 violates 81:1 violating 69:8 70:21 79:10 violation 56:21 57:8 59:21,24 60:2 68:9 89:20 110:2 visual 73:18 Vizguerra 151:18 voluntarily 146:15 147:2 voluntary 3:18 35:1,6,8,11,20,22 36:2,5 39:3,15,18 46:11,14 48:16,19	84:10,13 99:9,25 119:20 120:3 121:2,7,13,25 123:5,6,8 125:20 127:8,16 128:18 128:21 129:7 130:19 134:6 135:10 139:24 140:2 142:11 144:16 145:25 146:5,9,25 147:3 147:5,6,9,25 148:13 149:7,10 150:9,13 151:19 152:1,13 153:1,11 153:14 154:8,25 155:5 156:10 157:22 158:15 160:22 161:1,13 161:15,21 163:5 163:17,19,24 164:15 165:10 166:14 168:9 175:11 176:9,17 176:22 177:6,14 179:4,13,19 180:15,22 181:16 182:2,18 183:1 184:3,4,17 185:16 185:22 187:2 volunteer 127:11 127:22 143:7 162:2 volunteers 94:8 VWP 122:1	102:9 walks 75:12 wall 48:1,1 118:21 walls 24:25 25:7 45:8 47:19 48:2,4 98:24 99:1,2,6 102:19 138:20 167:9 want 7:5 8:20,22 21:23 28:2 35:16 40:21 41:18 43:7 48:23 63:12 74:16 75:1 77:2 84:8 88:25 94:11 95:5 95:7 102:12,21 103:13 104:4 111:16 116:21 120:19,22 124:8 126:8,10 127:1 129:12,22 130:2 132:18 134:19 135:1 136:22 137:14,19 138:13 138:14,17 140:3 142:11 149:8 153:20 158:5 168:12 170:6 175:20 180:25 181:18 187:21 wanted 6:18 61:9 66:19 68:24 88:24 103:5 110:6 117:10 181:6 wants 100:1,2 116:4 128:1 137:11,12 146:14 161:15 176:25 warden 12:18 18:21,22 19:4,8 19:18 23:1 28:16 28:16 69:4 70:3 86:22 91:16 102:22 112:9 159:12 warranted 53:17 wasn't 71:13 76:1 watch 40:4,5 55:18	59:11 watching 59:2,3 water 7:8 wax 138:15,23 waxing 139:4 way 40:9,24 58:11 59:7 60:22 67:3 72:20 84:3,19 115:9 120:22,23 124:19 125:20 144:3 187:12 we'll 7:3,9 33:17 41:5 72:9 75:6 82:14 91:6 97:9 113:4 125:18 141:16 155:12,14 164:15 172:22 175:4,5 188:10 we're 5:9 7:4,4 9:6 22:18 25:23 32:6 32:7,15 47:12 49:18 50:8 58:19 58:19 87:8 93:12 95:9 96:19 97:7 97:12 103:23,25 104:19 115:1,4,25 116:1,2,11 120:21 120:22,23 125:13 126:10 132:12 158:25 161:12 170:11 172:15 175:9 186:1 we've 10:4 51:13 75:8 85:22 95:5 115:13 130:4,4,6 153:15 181:4 184:2 188:6 week 14:6 22:8 56:10 61:3 163:15 weekday 164:15 welcome 73:1 111:6 115:17 well-being 117:25 went 23:21 146:19 168:3 WHEREOF 190:12
<hr/> V <hr/> v 1:8 34:10 97:13 123:7 128:3,3		<hr/> W <hr/> wage 103:3,6,14 169:8 170:25 Wait 133:17,17,17 143:22 waiting 48:9 176:24 waived 190:17 walk 73:7,9 112:12 138:10 159:1 walking 69:15 71:8		

window 48:10,11 windows 45:9 47:19 48:6,8,21 98:24 99:6 102:18 102:20 118:11 134:14,22 167:10 168:4 wings 176:24 wipe 37:4 48:10 wiped 68:23 wiping 95:17 131:5 136:13 140:9 wish 187:10 witness 5:18 6:16 6:16 12:14 76:20 77:3 137:4,11,12 190:12 wondering 63:15 word 40:11 113:16 113:21 114:18 132:20 136:18 137:7,9,20 138:4 154:22 words 6:16 17:16 26:12 90:12 123:6 132:5 161:8 167:25 172:1 work 3:18,20 14:4 14:6 20:2 21:23 22:8 24:9 26:14 33:17 35:1,6,8,11 35:20,22 36:2,3,5 36:6 39:3,15,18 46:11,12,15 48:14 48:17,19,20 84:10 84:13 86:20 91:17 92:2,14,15,17 93:8 94:2,14,17 94:25 96:9 99:9 99:25 100:7,7,10 100:13,15,17 108:8 119:20 120:3,19 121:2,7 121:13,25 122:1 123:5,6,7,23 124:1,5 125:20 126:24 127:8,11	127:12,16,22,23 128:17,21,22,25 129:2,6,7,9 130:19 135:10 139:24 140:2 141:4,25 142:11 142:11,19 143:9 144:16 145:25 146:10,15,25 147:1,1,6,13,23 147:25 148:2,13 149:6,7,10,10 150:9,13,21,21 151:1,4,6,19 152:1,2,13 153:1 153:11,14 154:8 154:25 155:5 156:10 157:22 158:10,15 159:7 160:7,9,22,22 161:1,15,15,21 162:2,3,5 163:5 163:17,19,24 164:7,15 165:10 165:17,21 166:3 166:15 168:8,9,19 168:20,25 169:13 169:16 172:14 174:12 175:11 176:9,17,22,25 177:4,6,14 179:4 179:13,19 180:15 180:22 181:16 182:2,18 183:1 184:3,4,17 185:16 185:22 186:18 187:3 worked 178:7,23 179:1,18,25 181:7 181:9 worker 141:22 142:5 151:14 152:2,9,12,20,21 153:7 154:19 172:3,4,25,25 workers 100:25 101:2,3,6 163:10	163:12 164:10,23 168:10,16,22 working 46:15 47:2 146:5,17 147:2 171:24 174:17 179:24 182:3 works 64:18 186:25 wouldn't 168:1 writes 132:12 written 58:11 64:17 175:25 176:6 <hr/> X <hr/> X 3:1 190:16 Xboxes 40:6 163:3 163:10 <hr/> Y <hr/> yards 73:15 yeah 45:25 88:17 92:5 120:18 146:2 year 13:5,20 14:12 15:10 16:20 33:3 43:5 49:10 50:11 61:4,20 66:15 177:3 180:21 years 6:14 10:1 17:2 18:25 22:4 23:21 33:24 49:13 49:25 50:3,10 65:3,8,20 68:22 70:1 83:10 119:21 119:23 <hr/> Z <hr/> <hr/> 0 <hr/> <hr/> 1 <hr/> 1 3:7 5:13,15,16 10:9 24:8 32:13 93:14 119:18,18 122:12 124:19 130:13 158:11 160:3 179:11 181:18 185:16	1,680 177:23 178:2 178:14 1.00 150:21,22 186:7 1:14-cv-02887-J... 1:2 1:17 116:18 1:19 116:16 10 11:16 103:25 104:1 125:8 126:2 10/24/14 3:16 10:59 72:10 100 56:21 58:18 1025 4:17 104 3:15 105 152:17 11 38:13 125:13 127:2 177:10 182:24 11:18 72:13 11:20 72:10 12 103:20 12.1.4-AUR 3:12 166:23 12/10/12 3:22 12:12 115:2 12:13 115:5 12:14 116:15 12:17 116:16 120 153:4 1212 2:4 12th 190:13 13 26:2,4,25 70:18 13.06 170:17 171:3 133 154:4,7 135 153:20 137 154:16 1395 159:2 1397 164:4 14 70:18 124:11,19 1400 165:24 169:11 170:12 1415 166:16,19,21 167:2 1419 95:10 1420 95:10 1421 95:10	15 14:3 125:7 142:22 143:24 144:7,11 150 18:12 1505 42:6 1508 42:24 46:4 95:15 1510 44:23 95:11 1511 95:11 1512 95:12 96:6 1513 95:12 1535 2:6 155 3:18 158 3:19 159 32:14 16 129:13 160 18:12 1612 178:6 181:5,6 1613 182:22 1680 178:25 179:6 179:18 17 82:20 170 18:12 175 19:11 177 3:22 18 87:12 116:1 18-2 103:18 1819 109:13 19 155:14 1900 4:17 1995 13:1,11 20:24 33:23 87:3 1998 15:1 1999 15:1 <hr/> 2 <hr/> 2 3:9 10:9,21 24:6,8 32:7,9 92:18 93:16 100:4 103:9 122:12 127:10,14 127:15,16,21 130:13 183:1 186:17 190:14 2:30 165:2 2:34 175:7 2:36 175:5 2:37 175:9
---	--	---	---	---

2:40 175:7	130:13 181:15,21	49 186:2	95:7 97:5,6
2:59 188:18	181:21		103:10 121:5
20 11:16 14:3,24	3/29/16 189:25	<hr/> 5 <hr/>	124:11 127:2
22:9 78:9,20	3:30 164:24	5 3:3,7,14 87:8,10	128:6 141:17
200 56:22 58:18	30 60:9 107:18	87:16,17 97:24	142:16 150:20
200-level 105:14	30-minute 107:11	116:1	151:11 155:12,13
2000 18:2	107:14,21 117:21	5.8 123:13,18	161:23,24 170:9
2000s 22:6	118:6	160:25 161:4	170:10 186:2,17
2005 19:1 86:23	30(b)(6) 1:4,12 3:7	50 50:5 182:7	7,000 50:11 170:15
20064016972 190:4	5:11,19 6:16 12:8	500 56:1	70 120:9 121:1
2008 91:10,12	12:14 92:19 93:14	51 38:24,25 87:19	144:15 151:10
125:11 126:14	300 2:7 52:10 58:2	179:23	165:9
155:10 158:5	108:17	52 87:19	7041 171:4
201 105:14 108:7	300-level 52:1,3,6	525 38:19 56:3	72 52:18 57:19
2010 43:8 70:18	52:14 57:16,25	53 87:19 128:6	80:22 89:22
2011 29:6 91:10,12	61:10 66:20 68:9	129:8 178:22	178:22 179:20,23
121:11 125:12,15	68:19 85:5 89:1	179:20,23	720 2:16
125:17,22 155:10	301 67:1	54 87:19 89:1 116:2	73 3:5
167:1	302 67:1	55 32:18,19 34:10	75 179:24
2012 154:13 178:3	306 52:5 58:2 89:2	87:19 97:7,10	76 3:5
178:16,22	89:20	56 36:9 97:7,11	7th 2:4
2013 29:8 121:11	32 3:9	581 104:8,23	
2014 47:6 103:17	35 176:15,21	582 106:16	<hr/> 8 <hr/>
142:22 143:19,21	35-day 179:9 180:9	59 82:23	8 3:19 32:15 41:5
143:24 144:7,11	37 103:9,12 170:8	595 2:12	95:9 158:11,21,23
145:22	170:11,12	596 108:1 110:14	8.1.8 159:19 160:21
2016 1:4,13 3:2	37208 2:4	597 109:1	162:8,8
4:16 188:19			8.1.8-AUR 3:21
189:14 190:13	<hr/> 4 <hr/>	<hr/> 6 <hr/>	159:17 166:2
2018 190:14	4 3:13 82:15,16,22	6 3:15 104:1,3,10	8:30 164:24
22 3:5 109:13	97:25 122:14	104:11 145:22	80 26:5 152:5
117:15	130:13 160:3	156:6	80203 1:13 2:10
24 58:16,16 171:19	186:17	6-ICE 3:18	80218 2:7
171:22	4,000 49:9	60 50:9 82:23 120:9	80246 2:17
24-hour 78:8	40 49:19 50:6 143:9	121:1 141:16,16	80302 2:13
24.05 171:16,18	144:19 146:12	144:15 165:9	82 3:13
25 3:5 14:24 103:17	400 89:10	182:7 183:7	87 3:14
26(a)(1) 3:9	400-level 58:2	60,000 49:19 50:5	
27 179:11	41 3:11	600 1:13 2:9	<hr/> 9 <hr/>
27040 171:13	450 1:13 2:10	604 109:23	9 3:22 158:20 159:2
29 1:4,13 3:2 4:16	46 38:24,24 121:8	61 82:23 141:17	166:14 177:10,12
29th 188:19	127:18,20	142:15	9/12 154:9
	47 39:5 121:19	62 147:20 148:19	9:30 165:1
<hr/> 3 <hr/>	123:8 128:3	149:16 150:20,20	9:34 1:14
3 3:11 11:1 41:6,7	131:17 133:24	636 104:8	9:36 4:16
49:9 93:15 95:10	48 73:8 161:24		90 32:20 157:3,3
119:17,19 122:13	162:14	<hr/> 7 <hr/>	
		7 3:18 32:5,7,10,14	