

Deposition of
George Soohoo
February 21, 2020
Volume II

Soohoo
vs.
State of California

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

STATE OF CALIFORNIA

Division of Workers' Compensation

WORKERS' COMPENSATION APPEALS BOARD

GEORGE SOOHOO,

Applicant,

vs. Case No. ADJ11815610

STATE OF CALIFORNIA, DEPT
CORRS-INST MEN, Legally Uninsured;
STATE COMPENSATION INSURANCE
FUND/STATE CONTRACT SERVICES,
Adjusting Agency,

Defendants.

DEPOSITION OF GEORGE SOOHOO

VOLUME II

San Diego, California

February 21, 2020

Reported by:
Debby M. Gladish
RPR, CCRR, CLR, CSR No. 9803
NCRA Realtime Systems Administrator
Job No. 10066983

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

STATE OF CALIFORNIA

Division of Workers' Compensation

WORKERS' COMPENSATION APPEALS BOARD

GEORGE SOOHOO,

Applicant,

vs. Case No. ADJ11815610

STATE OF CALIFORNIA, DEPT
CORRS-INST MEN, Legally Uninsured;
STATE COMPENSATION INSURANCE
FUND/STATE CONTRACT SERVICES,
Adjusting Agency,

Defendants.

DEPOSITION OF GEORGE SOOHOO, VOLUME II,
taken on behalf of Defendants at 1550 Hotel Circle
North, Suite 170, San Diego, California, beginning at
2:30 p.m., and ending at 5:14 p.m., on Friday, February
21, 2020, before Debby M. Gladish, RPR, CLR, CCRR, CSR
No. 9803, NCRA Realtime Systems Administrator.

1 APPEARANCES:

2 For Applicant:

3 LAW OFFICES OF PHILIP M. COHEN
4 BY: PHILIP M. COHEN, ESQ.
5 1550 Hotel Circle North, Suite 170
6 San Diego, California 92108
7 619.297.5100

6 For Defendants:

7 STATE COMPENSATION INSURANCE FUND
8 BY: STEPHEN P. TAYLOR, ESQ.
9 1615 Murray Canyon Road, Suite 500
10 San Diego, California 92108
11 619.209.3233

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

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

INDEX

WITNESS EXAMINATION
GEORGE SOOHOO
VOLUME II

BY MR. TAYLOR 66

EXHIBITS

MARKED PAGE
Exhibit A Memo dated November 7, 2018 103

1 San Diego, California; Friday, February 21, 2020

2 2:30 p.m. - 5:14 p.m.

3

4 GEORGE SOOHOO,

5 having been resworn, testified as follows:

6

7 EXAMINATION (Resumed)

8 BY MR. TAYLOR:

9 Q. Mr. SooHoo, we're here today in your attorney's
10 office to continue on with your deposition in what we're
11 calling Volume II that we first started on January 31st
12 here in your attorney's office.

13 And I'm going to assume that you remember
14 everything we discussed in the beginning of your first
15 deposition session about what a deposition is and
16 testifying under oath and give me your best testimony
17 today so that you don't have to change it later.

18 Do you remember all that?

19 A. Yes.

20 Q. So to speed things up and make sure we finish
21 today I'm going to dispense with going through that
22 whole thing.

23 Okay?

24 A. Okay.

25 Q. Are you okay with that?

1 A. Yes.

2 Q. Is there anything that you remembered that you
3 told me or I asked you on January 31st in Volume I that
4 you think you need to explain something else or change
5 or add to it or anything that you told me that you think
6 needs to be changed?

7 A. You asked me about the medications that we're
8 on.

9 Q. And what is it that you can tell me now?

10 A. I took the metformin for diabetes.

11 Q. You're reading. You wrote it down; right?

12 A. Yeah, these are all the medications.

13 Q. So I want to make sure we get the spellings
14 right so we don't drive Debby crazy. Is that your
15 handwriting that you have in front of you?

16 A. Yes.

17 Q. Is it legible, can I read it? Because if we
18 can --

19 A. I'm not too sure if it's all that legible.

20 MR. COHEN: Well, then can you --

21 BY MR. TAYLOR:

22 Q. Read it and spell it for her. So here's what
23 you do: You read the medication, you spell it, you tell
24 us what it's for and then you tell us afterwards who
25 prescribed it for you. Can you remember all that? That

1 will save a lot of time.

2 A. Sure.

3 Q. So read it, spell it, tell us what's it for and

4 then afterwards tell us who prescribes it.

5 A. Yes, sir.

6 Q. Okay. Go ahead.

7 A. Metformin, M-E-T-F-O-R-M-I-N, for diabetes.

8 Losartan-Hydrochlorothiazide, L-O-S-A-R-T-N [verbatim]

9 HCTZ, for my blood pressure. Amlodipine,

10 A-M-Y-L-O-D-I-P-I-N-E [verbatim], for blood pressure

11 also. Lovastatin, L-O-V-A-S-T-A-T-I-N, for cholesterol.

12 Fenofibrate, F-E-N-O-F-I-B-R-A-T-E. It's for elevated

13 triglycerides. And clopidogrel is

14 C-L-O-P-I-D-O-G-R-E-L, and that's to prevent strokes and

15 heart attack.

16 Q. Okay. Thank you.

17 Who prescribes all those for you?

18 A. Dr. Alexander Berdy.

19 Q. That's the same doctor you told us about last

20 time?

21 A. Yes.

22 Q. B-E-R-D-Y?

23 A. Yes, sir.

24 Q. Okay.

25 A. I didn't see my psychiatrist yet. I have two

1 medications.

2 Q. Give me your psych meds.

3 A. I don't remember. I didn't bring them, I'm

4 sorry.

5 Q. Who is prescribing your psych meds for you?

6 A. Shaun Chung.

7 Q. That's the same doctor you told me about last

8 time?

9 A. VA Long Beach.

10 Q. Are you taking those psych meds today?

11 A. Yes.

12 Q. Are they antidepressants, antianxiety, both?

13 A. Antianxiety.

14 Q. Are they both antianxiety?

15 A. No, one is for mood.

16 Q. When you say "mood," you mean antidepressant?

17 A. Yes.

18 Q. And how long have you been taking those psych

19 meds?

20 A. Approximately two years.

21 Q. Okay. And you're taking them today?

22 A. Yes.

23 Q. Do you think it causes you to have any problems

24 with memory or thinking or answering questions

25 accurately?

1 A. No.

2 Q. Okay. When we were last here for Volume I of
3 your deposition on January 31st, were you working full
4 time?

5 A. Yes.

6 Q. Okay. And where are you currently working?

7 A. Regional 4 in Rancho Cucamonga.

8 Q. When you say "Regional 4" do you mean that's
9 for the department of corrections?

10 A. Yes.

11 Q. What division -- division or department --

12 A. Healthcare services.

13 Q. Let me finish. What division or department is
14 Regional 4 part of CDCR?

15 A. Healthcare Services.

16 Q. And that's in Rancho Cucamonga?

17 A. Yes, sir.

18 Q. What is your actual job title there now?

19 A. Supervising.

20 MR. TAYLOR: Off the record a second.

21 (Off the record.)

22 MR. TAYLOR: Back on the record.

23 BY MR. TAYLOR:

24 Q. Your job title is supervising dentist?

25 A. Yes.

1 Q. What is -- what is the actual bureaucracy code
2 number or name or whatever? Don't you have some kind of
3 level or grade, pay grade?

4 A. Supervising dentist.

5 Q. That's it?

6 A. Uh-huh.

7 Q. So it's not supervising dentist one, two,
8 three, four?

9 A. No.

10 Q. Okay. And is that largely administrative as
11 opposed to physically doing clinical work as a dentist?

12 A. If you are in the -- can you repeat your
13 question.

14 MR. COHEN: Maybe make it more specific.

15 BY MR. TAYLOR:

16 Q. I'm trying to get at physically, literally what
17 you do. In workers' comp there is a big difference in
18 doing office work and doing work that physically
19 requires you to do things with your hands and your body.
20 You see what I'm saying?

21 A. Yes, sir.

22 Q. That's what I'm trying to do. I know that as a
23 dentist you do some things physically, but in your past
24 testimony you told me about a lot of administrative
25 stuff, which is office work. So I'm trying to find out

1 how much you do now as a supervising dentist, how much
2 administrative office work do you do that's just
3 computers and phones and handwriting and typing as
4 opposed to clinical work, which is as a dentist where
5 you're using your body and your arms and your hands to
6 work on patients, et cetera?

7 A. A hundred percent administrative.

8 Q. Okay. Do you have a supervisor or a superior
9 manager over you there at Rancho Cucamonga?

10 A. Yes.

11 Q. Who is that?

12 A. Dr. Jeff Lissy.

13 Q. Spell, please.

14 A. J-E-F-F L-I-S-S-Y.

15 Q. And what is Dr. Jeff Lissy's title?

16 A. Regional clinical director.

17 Q. Regional clinical director. Does he physically
18 share the same office with you? Does he manage you
19 remotely by computer and phone? Does he occasionally
20 come into the offices where you are? How does that
21 work?

22 A. He has his own office.

23 Q. There in the same place?

24 A. Yes.

25 Q. I have an address here of located at 10750

1 Fourth -- that's the word "Fourth" -- Street, Building
2 1, Suite 150, Rancho Cucamonga 91730. Is that the
3 offices?

4 A. Yes.

5 Q. Is that a state building or is the state
6 leasing some offices?

7 A. Leasing.

8 Q. What is contained in those offices besides
9 yours and Dr. Lissy's, what is there?

10 A. A lot of cubicles for telemedicine and
11 auxiliary administrative staff.

12 Q. What is an auxiliary administrative staff?

13 A. They have physicians, they have dental
14 assistants. They have hosts of healthcare service for
15 whatever medical sides. Majority, a lot of them are
16 telemedicine.

17 Q. Okay. So is there any clinical stuff going on
18 in your offices, literal dentistry going on?

19 A. No.

20 Q. And you are administrating, what, a particular
21 region of prisons in a region or what?

22 A. Southern region.

23 Q. What is contained in the southern region?

24 A. The -- they have a -- maybe eight or nine
25 institutions in the southern region.

1 Q. It's my understanding that your history that is
2 mostly involved with the workers' comp claims that
3 you're making is the California Institution for Men at
4 Chino; is that correct?

5 A. Not particularly.

6 Q. Well, was there a lot of your work history at
7 the California Institution for Chino?

8 MR. COHEN: Vague and ambiguous what "a lot"
9 means.

10 MR. TAYLOR: I understand. I got to get
11 started somewhere.

12 BY MR. TAYLOR:

13 Q. I'm trying to find out the places you've worked
14 mostly and it's my understanding that you were working
15 for California Institution for Men at Chino at some
16 point before you went to where you're working now; is
17 that correct?

18 A. When I started, it was at Blythe at Ironwood
19 State Prison.

20 Q. I know that. I'm trying to fill in going
21 backwards from where you are now. Okay?

22 A. Uh-huh.

23 Q. Is that a "yes"?

24 A. Yes.

25 Q. Is it true that you worked for a while at

1 California Institution for Men at Chino?

2 A. Yes.

3 Q. For how long?

4 A. Approximately ten years.

5 Q. Just tell me what those years are, from when to
6 when?

7 A. I don't exactly remember.

8 Q. This is one of those admonitions I gave you
9 about giving me an estimate or approximation, that's
10 okay. Just don't give me a pure guess. There has got
11 to be some kind of reasonable estimate.

12 A. 2010 to the present.

13 Q. Okay. So would it be fair to say that a
14 significant amount of the job history and work
15 circumstances involved in your workers' comp claims
16 occurred at -- when you worked at Chino; is that
17 correct?

18 A. Yes.

19 Q. Okay. When did you transfer over to the --
20 what do you call it -- the Healthcare Services Region 4
21 in Rancho Cucamonga?

22 A. July 13th.

23 Q. Of what year?

24 A. 2018.

25 Q. Okay. Where you're working now, are you at

1 full duty?

2 A. Yes.

3 Q. Is there anything that's required of you to do
4 even if it's just on occasion where you're working now
5 that you think you can't do because of some kind of
6 injury or symptom or limitation, physical limitation or
7 medical problem?

8 A. No. They -- I'm able to do everything, but
9 they gave me accommodation for my carpal tunnel.

10 Q. Okay.

11 A. On the computer. So I'm good.

12 Q. Carpal tunnel. You say you have carpal tunnel
13 in both hands?

14 A. Yes.

15 Q. Is one hand worse than the other?

16 A. Yes.

17 Q. Which hand is worse?

18 A. Right.

19 Q. Okay. What kind of accommodations they have --
20 they gave you to allow you to work with carpal tunnel?

21 A. Gave me a special chair, special keyboard and a
22 screen that goes up and down.

23 Q. Okay. And with those accommodations are you
24 able to do your job without any problems?

25 A. Yes.

1 Q. Okay. Can you just give us a rundown of your
2 typical day? I mean, I'm not -- you don't have to tell
3 me every single little thing that you do, but just
4 generally what are you doing in the day? Are you
5 sitting at a desk mostly and typing on a computer? Are
6 you on the phone a lot? Do you get up and go down
7 hallways and meet with people? Just describe that type
8 of thing, what is your typical day like?

9 A. Meetings, work with the other dentists on peer
10 review, consulting, discussion with other dentists and
11 then --

12 Q. What with other --

13 A. Discussions with other dentists and dental
14 assistants, audits.

15 Q. So does all of this just involving sitting at
16 desks or at meeting tables talking, being on the phone,
17 typing on your computer, things like that?

18 A. Yes.

19 Q. Okay. Is there anything else that you have to
20 do other than that type of work, the office work?

21 A. No.

22 Q. Do any of the people that you work with on a
23 regular basis have any problems with you as far as
24 interacting with you and working with you? Is
25 everything going smoothly or are you having any problems

1 with any particular people?

2 A. No.

3 Q. How about your supervisor, Mr. -- Dr. Lissy,

4 are you having any problems with him?

5 A. No.

6 Q. Do you know whether or not any of them know

7 about some of the ongoing things that occurred at Chino

8 before you transferred over that are involved in why

9 we're here today?

10 A. I do not know.

11 Q. Okay. But nobody has ever said or brought it

12 up like somehow they know about the things that took

13 place?

14 A. Dr. Lissy has.

15 Q. Because he's your supervisor?

16 A. Yes.

17 Q. He normally would have been consulted with and

18 advised about issues that might have happened in Chino

19 because you were transferring over; right?

20 A. Yes.

21 Q. I mean, that's not a surprise to you that he

22 knows about it because he's your supervisor; right?

23 A. Yes.

24 Q. Has he in any way ever treated you in any way,

25 spoken to you or communicated in a way that led you to

1 believe that what he knows from the history at Chino is
2 somehow causing him to not be fair to you or to not
3 treat you properly?

4 A. No.

5 Q. Okay. So you're okay with Dr. Lissy?

6 A. Yes.

7 Q. And how long have you been at Regional 4 Rancho
8 Cucamonga now? You said -- I forgot. You said
9 July 13th; right?

10 MR. COHEN: 2018.

11 BY MR. TAYLOR:

12 Q. So you have been two -- well, not quite two
13 years, a year and a half?

14 A. Yes, sir.

15 Q. And do you plan on transferring out or
16 promoting out or going anywhere else anytime in the next
17 couple of years?

18 A. No.

19 Q. As you sit here today, what is your -- I'm not
20 trying to get you to commit to a retirement plan, but
21 what is your long-term outlook as far as what you plan
22 on doing with where you are working now? Are you
23 planning on working there indefinitely? Do you plan to
24 retire anytime in the next few years or transferring out
25 or promoting out?

1 A. I enjoy clinical dentistry, so I have no plans
2 to retire.

3 Q. But you said clinical dentistry. You're not
4 doing clinical, you're doing administrative. Do you
5 understand?

6 A. Yes.

7 Q. So does that mean you might try to get a
8 transfer into a clinical job somewhere?

9 A. I don't know.

10 Q. Okay. In any of your treatment, your psych
11 treatment, is there anything, any issues that you're
12 having on dealing with your job description and duties
13 and your coworkers and supervisors where you're working
14 now?

15 A. Can you be more specific? I don't understand
16 your question.

17 Q. Well, you know, when people are taking psych
18 meds and getting psych treatment, you know, there's
19 issues that could be having at home or at work and there
20 could be relationship issues or they could be job issues
21 or they could be job environmental issues or job
22 pressure issues, whatever. There's all kind of things
23 that can be going into causing -- giving you
24 effects that affect your, you know, state of mind and
25 your stress and your psychology?

1 A. Yes.

2 Q. What is affecting you now?

3 A. Not at Rancho Cucamonga.

4 Q. Okay. So any effects that you might be talking

5 about with your treating psychologist or psychiatrist

6 have to do with things that happened before you went to

7 Rancho Cucamonga?

8 A. Yes.

9 Q. Is that mostly things that happened at Chino?

10 A. Yes.

11 Q. By the way, you said you were at Chino about

12 ten years?

13 A. Yes.

14 Q. Where were you before Chino?

15 A. I was at Region 4.

16 Q. Same place?

17 A. Yes, sir.

18 Q. In Rancho Cucamonga?

19 A. Yes.

20 Q. Is that part of the reason why you went back

21 there, because you had been there before and you -- the

22 thinking was that maybe, you know, you would have an

23 easier time transitioning into a position you were

24 already familiar with?

25 A. I was assigned there by headquarters.

1 Q. Okay. So that wasn't your choice?

2 A. No.

3 Q. Did you agree with that assignment when they
4 assigned you back to Region 4?

5 A. Yes. It was fine.

6 Q. Wasn't a problem for you?

7 A. No.

8 Q. So before you were at Region 4, what years was
9 that?

10 A. 2010, approximately. I'm not sure.

11 Q. This is, again, an approximation or estimate.

12 So was it just for a couple of years?

13 A. No. Maybe three or four months.

14 Q. Oh, okay. Where did you come -- what was your
15 job there for three or four months in Region 4 before
16 you went to Chino?

17 A. Dentist.

18 Q. Were you a clinical dentist or an
19 administrative dentist?

20 A. Clinical dentist.

21 Q. They had clinical offices there in the three or
22 four months that you were there at Region 4?

23 A. They're administrative office. There's no
24 clinic over there.

25 Q. You said you were a clinical dentist?

1 MR. COHEN: He said before he went to Regional

2 4.

3 BY MR. TAYLOR:

4 Q. This is the first time you were at Regional 4
5 for three or four months. That's what we're talking
6 about.

7 A. There's no such thing as administrative
8 dentist, only clinical dentist.

9 Q. Well, the job you're doing now is purely
10 administrative?

11 A. Yes. But title-wise there --

12 Q. Okay. There we go. So your title was clinical
13 dentist, but you weren't doing clinical dentistry in
14 that three or four months; is that correct?

15 A. Right.

16 Q. What did you actually do there in that three or
17 four months at Region 4?

18 A. We were under the Perez lawsuit so we did
19 audits of all the institutions.

20 Q. When you say "under the Perez lawsuit," what do
21 you mean?

22 A. They're specific metrics that the receiver put
23 out and guidelines they have to meet to get out of the
24 Perez lawsuit.

25 Q. Okay. If I remember correctly -- and this is

1 just to sum up so we don't spend too much time on it, I
2 remember something about that there was a lawsuit
3 against the prison system here in California about the
4 so-called bad conditions and substandard healthcare
5 treatment provided by the prisons to the inmates. And
6 that included not just dentistry, but all their medical
7 treatment. There was a lawsuit and the court appointed
8 a receiver to take over the operations and get them on
9 track for some period of time and that included, I
10 guess, the dental division, too. Is that what you're
11 talking about?

12 A. Yes, sir.

13 Q. Okay. So during that time at Region 4, you
14 were primarily working, auditing files and systems and
15 operations to bring them within compliance with what the
16 receiver wanted?

17 A. Yes.

18 Q. Okay. So just give me a short description of
19 what you did to audit?

20 A. We looked at infection control. It was a big
21 issue. Second thing we looked at spacing and the
22 structures, we have adequate space to provide care,
23 accommodate inmate population. And fourth thing was
24 basically be able to work as a team with other
25 healthcare providers to ensure we have a continuity of

1 care.

2 Q. Okay. In that three or four months, now that
3 we've been talking about it would it be fair to say that
4 that happened sometime in 2008 or 2009?

5 A. Repeat the question.

6 Q. In the three or four months that you -- the
7 first time you were working at Regional 4 when you were
8 doing auditing under the Perez lawsuit, would -- I'm
9 trying to see if we can pin this down to a year or
10 approximate year. Would it be fair to say that that was
11 sometime in 2008 or 2009, that three or four months?

12 A. Yes.

13 Q. Okay. Before that where had you been working
14 for the department of corrections?

15 A. I was chief dentist for department of juvenile
16 justice.

17 Q. Okay. So, again, trying to -- we're trying to
18 get our years and organize this so we can discuss it,
19 you know, in an organized fashion. If I remember
20 correctly -- and when we were doing Volume I of your
21 deposition on January 31st, you estimated that you were
22 the chief dentist for the department of juvenile justice
23 for about 13 years?

24 A. Yes.

25 Q. Give me those years again, those 13 years?

1 A. Approximately 1998 to 2010.

2 Q. Okay. Very good. All right. Now, at any time
3 when you were with the department of juvenile justice,
4 do you recall having any workers' comp issues there,
5 whether it was physical injuries or psychological stress
6 claims or anything like that while you were the chief
7 dentist for the department of juvenile justice?

8 A. I never reported hand and back issues.

9 Q. What did you say, 1998 to about 2010. So you
10 said you never reported, but you had neck and back
11 issues?

12 A. Yes.

13 Q. During that 13 years?

14 A. Yes.

15 Q. Okay. Can you tell me why you never reported
16 them?

17 A. No.

18 Q. Okay. What kind of neck issues were you having
19 during that 13 years?

20 A. Soreness.

21 Q. Was there anything that would bring it on
22 particular, like a particular activity?

23 A. Spent too much time in a patient's mouth and
24 not taking a break.

25 Q. Okay. And so what you're saying is, I'm using

1 my common sense here, a dentist is working on patients
2 and you're looking down, they're in the chair underneath
3 you and you got the lamp over them and you have got a
4 dental assistant there. And you are working on their
5 teeth so you're kind of bent over with your neck looking
6 into their mouth; is that right?

7 A. Yes.

8 Q. Apparently you had a lot of patients every day?

9 A. Normal flow.

10 Q. Normal flow. How many patients would you see
11 in a day on average?

12 A. Six to eight.

13 Q. But you what -- you said was you never got a
14 break so I'm assuming that there was some kind of
15 workload?

16 A. No, it depends on the patient's needs.

17 Q. Some you would have to spend a lot more time
18 than with others?

19 A. Yes.

20 Q. Did you have a lot of kids with rotten teeth
21 because they're in the juvenile justice system?

22 A. Yes.

23 Q. It wasn't necessarily a patient overload, it's
24 just that your average patient took a lot more work than
25 your average child or teenager might be out in the

1 private sector?

2 A. Yes.

3 Q. Is that what you're saying?

4 A. Yes.

5 Q. You got neck soreness?

6 A. Yes.

7 Q. Did you ever take any time off workers' comp

8 for neck soreness during that 13 years?

9 A. No.

10 Q. Did you get treatment for your neck from any

11 doctors or healthcare providers for your neck during

12 those 13 years?

13 A. I just got massage therapy and things like

14 that.

15 Q. Okay.

16 A. I went to the jacuzzi. I'm a member of the

17 health so every day I would go.

18 Q. No official formal medical treatment for your

19 neck during that time?

20 A. No.

21 Q. Is that correct?

22 A. Yes.

23 Q. How about your back, what kind of back issues

24 were you having during that 13 years with the department

25 of juvenile justice?

1 A. Times that I couldn't get up, wake up.

2 Q. What do you mean, couldn't get up out of bed?

3 A. Yes.

4 Q. What does that have to do with your back?

5 A. Couldn't get up because either I pulled my back
6 or muscle or whatever.

7 Q. So you had a back pain?

8 A. Yes.

9 Q. Okay. And do you have any reason to believe
10 the back pain is related to what you were doing in work
11 back then?

12 A. Sure.

13 Q. What tells you it was related to work?

14 A. Because I would bend and stoop all the time.

15 Q. Okay.

16 A. You know.

17 Q. Basically for the same reasons you had neck
18 soreness?

19 A. Yes.

20 Q. Is that what you're saying?

21 Okay. Were you getting any official medical
22 treatment, any kind of formal medical treatment for your
23 back during that 13 years?

24 A. I might have seen a chiropractor.

25 Q. But that's about it, just something you might

1 have done?

2 A. Uh-huh.

3 Q. Is that a "yes"?

4 A. Yes.

5 Q. So in other words there's no doctors or

6 healthcare providers we can talk about and discover for

7 your neck and your back during those years?

8 A. The back, I think it's in the Kaiser because I

9 couldn't move my back. I had to see a doctor.

10 Q. What location of Kaiser were you going to back

11 then?

12 A. Buena Park.

13 Q. Okay. So when you were with the department of

14 juvenile justice what city did you live in?

15 A. Buena Park.

16 Q. So if you got back treatment for your back

17 soreness during that time period it would most likely be

18 in your Kaiser records out of the Buena Park location?

19 A. I'm not sure, but I'm -- I went -- I'm pretty

20 sure I did.

21 Q. Okay. Any reason why you didn't report your

22 back problems to work back then?

23 A. No.

24 Q. Okay. So we're going up to the 13th year

25 before you left the department of juvenile justice is

1 your neck and back soreness that we've just been
2 discussing the first time you had any kind of workers'
3 comp kind of complaints from your job with the
4 department of corrections starting with Ironwood and all
5 the way up through the department of juvenile justice?

6 A. What's your question?

7 Q. Okay. I'm trying to go through your work
8 history and see when any workers' comp claim or physical
9 problems popped up.

10 A. When they first popped up?

11 Q. Yes. You told me about the 13 years between
12 1998 and 2010 when you were at the department of
13 juvenile justice in Buena Park. You told me about the
14 neck and back issues. I know you were working at
15 department of corrections before you went to the
16 department of juvenile justice. Did you have any
17 medical problems or workers' comp injuries or complaints
18 before you went that 13 years to the department of
19 juvenile justice in Buena Park?

20 A. No.

21 Q. So when you transferred from department of
22 juvenile justice in Buena Park to the California
23 Institution for Men at Chino, in your entire history of
24 working with the department of corrections in any
25 department or any division, the only thing you had ever

1 had was the neck soreness and the back soreness while
2 working as a clinical dentist at the department of
3 juvenile justice; is that right?

4 A. I had hand issues.

5 Q. Do you remember when you first started having
6 the hand issues, what year it was or where you were
7 working?

8 MR. TAYLOR: Let's go off the record.

9 (Off the record.)

10 THE WITNESS: No, I don't.

11 BY MR. TAYLOR:

12 Q. Okay. Let me put it this way: Could it be
13 that even if you had hand issues it might very well be
14 that didn't come out until after you left the department
15 of juvenile justice?

16 A. I'm not sure.

17 Q. Okay. While you were with the department of
18 juvenile justice did you have any kind of work
19 relationship problems with coworkers or management of
20 any kind? I know that's a broad question but we've got
21 to start somewhere.

22 A. No.

23 Q. Okay. So who was your supervisor while you
24 were with the department of juvenile justice when you
25 transferred to Chino?

1 A. Dr. Hung Do.

2 MR. COHEN: He was the supervisor where?

3 THE WITNESS: At Southern Youth Reception

4 Center in Norwalk.

5 BY MR. TAYLOR:

6 Q. Okay. Dr. Hung Do is H-U-N-G D-A-O?

7 A. No, D-O.

8 Q. What is he a dentist?

9 A. No, he was a medical doctor. He's a chief
10 medical officer.

11 Q. Chief medical officer. And his offices were in
12 Norwalk?

13 A. Yes.

14 Q. But by virtue of his position he was basically
15 your supervisor when you were the chief dentist at the
16 department of juvenile justice at Buena Park; is that
17 right?

18 A. Yes.

19 Q. And would it be fair to say that if -- do you
20 know if he still works for the department of
21 corrections?

22 A. I don't know.

23 Q. All right. But would it be fair to say if he
24 still worked for the department of corrections and we
25 wanted to find out if you had any kind of workplace

1 relationship problems while with the department of
2 juvenile justice that we could go to him and get records
3 and he would be able to comment on that?

4 A. Yes.

5 Q. Okay. Was Dr. Do involved in your transferring
6 from the department of juvenile justice to the
7 California Institution for Men at Chino?

8 A. No.

9 Q. He didn't have to get involved in you
10 transferring?

11 A. Just sign a paper.

12 Q. Okay. Well, he had to approve it, though;
13 right?

14 A. No.

15 Q. Oh, he didn't? Is there somebody that had to
16 approve your transfer?

17 A. They're closing -- they closed the DJJs that's
18 why I got demoted to a regular dentist.

19 Q. The department of juvenile justice closed in
20 2010?

21 A. Approximately.

22 Q. Okay. And that's why you transferred to the
23 California Institution for Men at Chino?

24 A. Regional, because there were no openings.

25 Q. So you got transferred to Regional?

1 A. As a dentist until -- the supervising dentist
2 position. They got rid of the chief dentist position.

3 Q. That's when you were there for that three or
4 four months?

5 A. There you go. I didn't want to . . .

6 Q. I'm trying to organize this so we can get
7 through it and get it over with. There was no other
8 reason why you got transferred from department of
9 juvenile justice to Regional 4, other than the fact that
10 juvenile justice closed down and you took a demotion to
11 a clinical dentist?

12 A. I was put on that number scoring, how long
13 priority system subject to.

14 Q. Understood. Okay. But it had nothing to do
15 with any kind of workplace problems or discipline or
16 anything like that; is that correct?

17 A. Correct.

18 Q. You said "yes"?

19 A. Yes.

20 Q. Okay. All right. So now you were there for
21 three or four months at Regional 4. We've talked about
22 that a little bit. Was there any problems there during
23 that three or four months?

24 A. No.

25 Q. How about workers' comp injuries or medical

1 problems or anything like that during that three or four
2 months?

3 A. No.

4 Q. Okay. So then what, how and why did you get
5 transferred to Chino after you were at the Regional 4
6 office for three or four months?

7 A. I took a, what do you call it, step down as a
8 dentist from a chief.

9 Q. Right.

10 A. Then since they got rid of the chief dentist, I
11 moved to the next level which is supervising dentist.

12 Q. Who got rid of the chief dentist?

13 A. Headquarters. They still have them but they're
14 only at headquarters in Sacramento.

15 Q. Okay. So, in other words, they have removed
16 the chief dentist position at Chino and other prisons
17 and changed that and that allowed you an opportunity to
18 transfer to Chino?

19 A. You open up -- you -- they give you an option
20 to go when there is an opening where somebody retires,
21 wherever it is, whoever has the highest seniority will
22 get that position.

23 Q. You told me they closed down the chief dentist
24 position at Chino and that led you -- opened up a
25 position for you to transfer; is that right?

1 A. Supervising dentist because what happened was
2 they reorganized and got rid of -- because there was a
3 chief dentist at Chino also. And then reorganized it
4 and brought in the HPM3 and then basically -- and
5 downgraded, got rid of the chief dentist and put a
6 supervising dentist in there.

7 Q. That basically says the same thing I just said
8 but with more detail. It opened up a position for you
9 and you transferred out there as a supervising dentist
10 in Chino in 2010?

11 A. Yes.

12 Q. Okay. Had nothing to do with workplace
13 problems or discipline or anything like that?

14 A. No.

15 Q. Is that correct?

16 A. Yes.

17 MR. TAYLOR: Off the record.

18 (Off the record.)

19 BY MR. TAYLOR:

20 Q. I'm sorry, Mr. SooHoo.

21 MR. TAYLOR: And I'm sorry, Debby.

22 BY MR. TAYLOR:

23 Q. Okay. So to -- let me summarize this and even
24 if I don't use the exact bureaucratic lingo, if it's
25 essentially correct then tell me "yes" or "no." Okay?

1 Okay?

2 So basically, you got the opportunity in about
3 2010 to transfer to Chino California Institution for Men
4 as a supervising dentist because they had done a
5 reconfiguration of the dental department's management
6 structure and they eliminated the chief dentist at
7 Chino; is that correct?

8 A. Yes.

9 Q. Okay. And that gave you an opportunity to
10 transfer there, but you could not do it as a chief
11 dentist because they eliminated that job title and you
12 transferred there as a supervising dentist?

13 A. Yes.

14 Q. Had nothing to do with workers' comp claims or
15 medical problems or workplace-related problems or any
16 kind of discipline or anything; is that correct?

17 A. Yes.

18 Q. Okay. So do you remember the approximate month
19 you started at Chino in 2010 or anything like that?

20 A. Maybe August.

21 Q. Okay. You have made claims -- well, you have a
22 claim for damage to your, I guess, blood pressure and
23 cardiovascular system. Are you aware of that?

24 A. Yes.

25 Q. All right. What kind of problems or damage to

1 your cardiovascular system and your blood pressure were
2 caused by your workplace duties or environment?

3 A. The culture of the staff, supervisor.

4 Q. Culture of staff and supervisor?

5 A. Supervisors, they were not there.

6 Q. Some were gone?

7 A. They're all on workman's comp.

8 Q. Some are gone?

9 A. Or they -- for whatever reason.

10 Q. I understand. But did you say some of them
11 were gone?

12 A. Yes.

13 Q. Are they all gone?

14 A. No, the ones in my dental department were gone.

15 Q. They're all gone now?

16 A. No, no, no. During the time I was there they
17 were absent. It made my job --

18 Q. Okay. You got to be -- all right. Come on.

19 Because the way you were talking about before is like
20 they caused your problems, but what you're saying is
21 they were missing so that made your workload more?

22 A. There you go.

23 Q. Okay. All right. And this was all at Chino;
24 right?

25 A. Yes, sir.

1 Q. Can we get an agreement that every time I say
2 "Chino" I mean California Institution for Men at Chino
3 so I don't have to keep saying that over and over again?

4 A. Yes.

5 Q. We're talking about the years 2010 -- yeah,
6 2010 through up until 2019 or 2020; right?

7 A. 2018.

8 Q. 2018 so we're talking about 2010 through 2018.
9 I think this is July 6?

10 A. July, July 6, but the initial when they brought
11 me out was July 6. Then I got orders to go to report to
12 Regional a week later.

13 Q. That's fine. I just want to get the time that
14 you were there. So about 2010 through July 6, 2018, at
15 Chino; right?

16 A. Uh-huh.

17 Q. "Yes"?

18 A. Yes.

19 Q. The problems that you believe were caused to
20 your cardiovascular system and blood pressure was part
21 of it was the fact that you were overworked because
22 there were a lot of missing supervisors and you had to
23 take up their workload and part of it was the culture of
24 the staff?

25 A. Yes, sir.

1 Q. Is there anything else?

2 A. My supervisor.

3 Q. Who was your supervisor?

4 A. Louie Escobel.

5 Q. Louis, L-O-U-I-S?

6 A. L-O-U-I-E.

7 Q. L-O-U-I-E. E-S-C-O-B-E-L?

8 A. B-E-L-L.

9 Q. B-E-L-L. And what was his job title?

10 A. CEO.

11 Q. So he was CEO of the whole prison at Chino?

12 A. Healthcare.

13 Q. CEO of healthcare. So he wasn't just CEO of
14 the dentistry department, he was CEO of all healthcare?

15 A. Yes.

16 Q. But was he just at Chino or was he a regional
17 CEO that had other prisons under him?

18 A. Just Chino.

19 Q. And the first time you met Louie Escobell was
20 when you first transferred to Chino in about 2010?

21 A. No.

22 Q. When had you previously met Mr. Escobell before
23 that?

24 A. He didn't start until maybe -- may I use my
25 notes?

1 Q. Yeah, sure.

2 A. Okay.

3 Q. You know, that might help me with something
4 here. Let the record reflect that Mr. SooHoo has got
5 some notes in front of him. I actually have a copy of
6 what I think he's looking at because it looks the same
7 to me. So let's just go ahead and get that out of the
8 way. I've got here a one-, two-, three-, four-, five-,
9 six-page confidential memo stapled together, not on
10 letterhead, just on copy paper, dated November 7, 2018.
11 It appears to be from you and it says underneath
12 "Confidential, addendum to the SCIF claim." And under
13 that it says, "Stress relating to my employment at
14 California Institution for Men."

15 I'm going to show you a copy of this and I want
16 you to show it to your attorney and tell me if that's
17 the exact same full and complete copy of the notes that
18 you were referring to that you have in front of you?

19 A. Yes.

20 Q. Okay. And can you show it to your attorney,
21 please?

22 MR. TAYLOR: Phil.

23 MR. COHEN: Uh-huh, yeah, okay. So November 7,
24 2018. He's got a copy. You have a copy.

25 MR. TAYLOR: Off the record.

1 (Defendants' Exhibit A marked.)

2 BY MR. TAYLOR:

3 Q. We will mark this copy that Mr. SooHoo
4 identified as his notes collectively, all pages, as
5 Exhibit A. It is -- I'm going to write on here. I'm
6 hand writing now the page numbers at the bottom of each
7 page. It comes out to about five and a half pages, the
8 last page being marked as page 6. Can you see that
9 where I have written all of that, Mr. SooHoo, and
10 identify that for the record so that we can attach it
11 and we know that we have a complete set of your notes?

12 A. Yes.

13 Q. Okay. So Exhibit A is just a copy of
14 Mr. SooHoo's notes. When I asked him when he -- when
15 did he first run across Mr. Escobell he was going to
16 refer to his notes; is that correct?

17 A. Yes.

18 Q. And if you would, sir, then tell us where
19 you're looking for that information so I can see it on
20 Exhibit A?

21 A. This second on the first page.

22 Q. First page, second paragraph?

23 A. Yes, uh-huh, October 15th, April 25th.

24 Q. Okay.

25 A. That's approximately when he started working

1 there.

2 Q. Okay. So it says, "I was given Individual
3 Development Plan by the CEO, Mr. Louie Escobell, on
4 November 30th, 2015."

5 Now, was this when you were already at Chino?

6 A. Yes.

7 Q. And that's the first time you met him?

8 A. I met him before, but he only was working
9 there, like, maybe two months. He was new.

10 Q. So you might have met him before, but you never
11 worked with him or dealt with him in any detail?

12 A. No, I never met him before. Just that he's
13 worked there two months before he gave me this.

14 Q. Okay. Fine.

15 A. That's all I'm saying.

16 Q. So he gave you this, personally handed you the
17 individual development plan?

18 A. Yes.

19 Q. That's the first time you ever met him?

20 A. Yes.

21 Q. In all honesty, before you met him had there
22 been any gossip or anybody telling you anything about
23 this guy, like he's going to be our boss, you better
24 watch out for him or anything about him?

25 A. No.

1 Q. So when you first met him as you have in your
2 notes on Exhibit A and he handed you the individual
3 development plan, you knew nothing about Mr. Escobell
4 other than he was a CEO handing you this plan; is that
5 right?

6 A. Yes.

7 Q. All right. And after that he was your direct
8 supervisor?

9 A. Him and Dr. Lissy at Regional.

10 Q. Right. As far as you know, was Mr. Escobell
11 trained as a healthcare provider, doctor or physician,
12 dentist, anything like that or was he just a civilian?

13 A. I don't know.

14 Q. Okay. But Dr. Lissy was a trained dentist;
15 right?

16 A. Yes.

17 Q. And, to summarize as we sit here now, you never
18 had a problem with Dr. Lissy; is that correct? He
19 was -- to this day everything was okay with him and you?

20 A. We had our differences.

21 Q. Okay. Everybody does. When you say
22 "differences" what kind of differences? And you're
23 talking about Dr. Lissy; right?

24 A. Yes.

25 Q. While you were at Chino?

1 A. Yes.

2 Q. Okay. Go ahead.

3 A. We would have disagreements at timelines and he
4 wanted me -- he doesn't understand organizational
5 structure of CIM, you know, so . . .

6 Q. Okay.

7 A. So we had our differences.

8 Q. All right. So you had differences and
9 deadlines and work demands, things like that; right?

10 A. Yes.

11 Q. Did it ever have anything to do with, you know,
12 bad behavior, like he was accusing you of sexual
13 harassment or abusing coworkers or doing anything
14 unethical or abusive or improper?

15 A. No.

16 Q. It was just professional disagreements over
17 operations and deadlines and things like that?

18 A. Yes.

19 Q. Did he ever threaten to fire you?

20 A. No.

21 Q. Did he ever threaten to write you up or give
22 you progressive discipline?

23 A. No.

24 Q. All right. So overall, other than your
25 disagreements, would you say that you and Dr. Lissy had

1 a pretty good relationship the whole time?

2 A. Yes.

3 Q. And would it be fair to say that none of your

4 psych -- any psychological claims or psychiatric claims

5 that you're making about stress or working conditions at

6 Chino, none of that relates to Dr. Lissy, would that be

7 fair?

8 A. Yes.

9 Q. Okay. What about Mr. Escobell then, what --

10 you said that, you know, your supervisor was a problem.

11 How was Mr. Escobell a problem to you?

12 I'm just -- and it's no big deal. I'm going to

13 verbally say that you're referring to your notes; is

14 that fair?

15 A. Yes.

16 Q. Let the record reflect that Mr. SooHoo is

17 referring to his notes we marked as Exhibit A.

18 Go ahead.

19 A. Individual development is something you give

20 to --

21 Q. Individual development plan?

22 A. Plan, yes, is something you give when you

23 supervised somebody for a year. Because I have to do it

24 with my staff and it's something that basically within

25 that year if they were deficient on anything, you have

1 to give them a ECR or a LOI, whatever it is, and it has
2 to be noted on their records before you put any Ns or
3 need improvements on their IDP or independent
4 development plan. He comes in and works three months
5 and he gives me a couple Ns, which he hasn't been there
6 for two or three months.

7 Q. Right off the bat you had a problem with him
8 because he gives you an individual development plan. He
9 hasn't even worked with you for a year and he's already
10 given you a couple of Ns, meaning needs improvement, and
11 that was wrong because he hadn't even been there a year.
12 Is that what you're saying?

13 A. Yes.

14 Q. Did you protest to him at that time about that?

15 A. Yes, I tried to talk to him. He blew up.
16 Said, "I am the hiring authority. I'm your boss."

17 And so I went up to Regional. I went to a
18 higher level with it. And then I brought the medical
19 ERO in. She said let me look at it and I'll get back to
20 you.

21 Q. Let me stop you there. So right off the bat
22 Mr. Escobell did something that was, in your opinion,
23 wrongful and then he actually -- he acted
24 inappropriately because he blew up and got angry with
25 you?

1 A. Yes.

2 Q. Was this a face-to-face meeting?

3 A. Yes.

4 Q. And then what you did is you took the
5 administrative actions to go to the next authority to
6 have them weigh in on whether what he was doing was
7 wrong and out of line?

8 A. Yes, and I wrote a long letter to the Regional.

9 Q. Is that letter anywhere in your notes we marked
10 as Exhibit A?

11 A. I gave it to investigation so it's not here,
12 but . . .

13 Q. Okay. So letter -- who was the letter to?

14 A. Addressed to Robert Herrick.

15 Q. Letter to Robert H-E-R-R-I-C-K?

16 A. Yeah. He was the CEO there at CIM before.

17 Q. Hold on. You're killing her with all these
18 letters because you know what you're talking about but
19 she's never heard them before.

20 Robert Herrick was the CEO?

21 A. At CIM.

22 Q. Before Louie Escobell came in?

23 A. Yes.

24 Q. Where was Robert now?

25 A. He's in Regional. He's the Regional CEO.

1 Q. Was ex-CEO of California Institution for Men at
2 Chino before Louie Escobell. And Mr. Herrick was now
3 regional what?

4 A. The regional administrator for Region 4.

5 Q. Okay. So he was above Mr. Escobell when this
6 incident of the individual development plan came up?

7 A. Yeah.

8 Q. Is that correct?

9 A. Yeah, he hired Louie.

10 Q. Did you know Mr. Herrick before he transferred
11 to being the regional -- wait a minute.

12 A. I worked --

13 Q. Hold on. Regional administrator, did you know
14 Mr. Herrick before that?

15 A. Yes.

16 Q. So would it be fair to say that you trusted Mr.
17 Herrick to weigh in on this and fix this problem?

18 A. Yes.

19 Q. That's why you wrote him a letter?

20 A. Yes.

21 Q. Can you give me the date of the letter?

22 A. Somewhere between October 15 and April 25. I
23 don't know the exact date.

24 Q. All right. Was it a one-page letter, two
25 pages?

1 A. Three pages.

2 Q. Do you still have a copy of it?

3 A. Yes.

4 Q. Would you mind -- if we don't have that -- we

5 may have it. I don't have it, but if we don't have it

6 do you mind giving another copy to your attorney for us?

7 A. Sure.

8 Q. Okay. Thanks. Basically summarize what you

9 said in that letter to Mr. Herrick?

10 A. I explained to Mr. Herrick that basically I

11 tried to discuss this issue, my individual independent

12 development plan to Mr. Escobell. And he does not fully

13 understand the impact of the IDP by giving me two Ns

14 because there's no documentation throughout the year

15 that justifies the two Ns. And I feel like, basically,

16 he does not know the protocol for writing IDPs. So I

17 asked him to review it --

18 Q. Asked him, meaning Mr. Herrick?

19 A. Asked Mr. Herrick and Dr. Jeff Lissy to review

20 it because it's supposed to be evaluated by Dr. Lissy

21 and Mr. Escobell and Dr. Lissy never even saw it. He

22 evaluated all of it himself. Because he's not a dentist

23 so that's why it's half Lissy and half the CEO.

24 Q. One of the other problems that Mr. Escobell did

25 that, according to what you saw, was that he's not a

1 dentist and he's not allowed to review the independent
2 development plan by himself because he needed -- Dr.
3 Lissy needed to be in on that?

4 A. Yes, sir.

5 Q. Is that correct?

6 A. Yes.

7 Q. So that was the second problem?

8 A. Yes.

9 Q. Did Mr. Escobell know that you had written this
10 letter to Mr. Herrick?

11 A. I sent him a copy as well.

12 Q. So he knew about it?

13 A. Yes.

14 Q. All right. What happened then after -- did you
15 hear back from Mr. Herrick or what happened next?

16 A. I didn't hear back from anyone except the
17 medical ERO.

18 Q. So you heard from the medical ERO?

19 A. Cindy Ballou.

20 Q. Is that in your notes that we marked as Exhibit

21 A?

22 A. Yeah, right here.

23 Q. What does ERO stand for?

24 A. Employee relations officer, medical employee
25 relations officer. The first page on the bottom here,

1 medical, Cindy Ballou, third sentence from the bottom.

2 Q. Okay. Cindy Ballou is B-A-L-L-O-U. Right?

3 A. Uh-huh.

4 Q. How did you hear from Cindy Ballou, by letter,
5 e-mail, memo, phone call, walking in your office, what?

6 A. She's from Sacramento. She comes around the
7 institution once a month and I spoke to her about my
8 IDP. She said let me look into it.

9 Q. And prior to you talking to her about that, you
10 had not heard yet back from Mr. Herrick or Dr. Lissy
11 about the letter you wrote to Mr. Herrick?

12 A. No.

13 Q. Okay. And so what happened after Cindy Ballou
14 looked into it?

15 A. On April -- I received a new IDP with no
16 explanation with no Ns on it and told me to sign it.

17 Q. How did you receive that, in the mail or did
18 somebody hand it to you?

19 A. No, I went into his office.

20 Q. Whose office?

21 A. Mr. Louie Escobell's office.

22 Q. This time you had --

23 MR. COHEN: Directly from him?

24 THE WITNESS: His secretary, yes.

25 BY MR. TAYLOR:

1 Q. Okay. But the Ns for needs improvement had
2 been removed?

3 A. Yes.

4 Q. Now it was clean?

5 A. Yes. And I gave copies of the before IDP and
6 after IDP to internal affairs. I gave them copies.

7 Q. To show the previous one that was wrong and the
8 correction that you believe he was forced to make right?

9 A. I -- I don't know. No one said anything. I
10 wasn't informed of anything.

11 Q. But he wouldn't even hand it to you personally,
12 he gave it to his assistant and she handed it to you for
13 signing?

14 A. Yes.

15 Q. Regardless of the history of that, now that you
16 got to sign one that had been cleaned up, were you
17 satisfied that you got that result?

18 A. Yes.

19 Q. Okay. So tell me what else -- was Mr. Escobell
20 then your major problem as far as work relations and
21 your psych claims while working at Chino?

22 A. Let's go to page 2.

23 Q. Of your Exhibit A?

24 A. Yes.

25 Q. All right.

1 A. We were doing HPMIII interviews.

2 Q. Which paragraph are you looking at?

3 A. At the top.

4 Q. Where it says, "Approximately early 2016"?

5 A. Uh-huh.

6 Q. Okay. Go ahead.

7 A. Who was on the panel was me, Dr. Lissy and the
8 CEO.

9 Q. Mr. Escobell?

10 A. Yes.

11 Q. Okay. From now on, don't say CEO, say Mr.
12 Escobell because we're -- that's who we're talking
13 about. All right. Go ahead.

14 A. So it was scheduled for two-day interviews.
15 After the first day, he goes is there any comments or
16 questions about the candidates we interviewed. I said,
17 yes. Ms. Rowena Sam, our supervising dental assistant,
18 said she's not very cordial and not very helpful.
19 Because she -- and Ms. Logan was not -- because she's
20 one of the applicants that applied for the position, is
21 not very cordial to work with dental as far as getting
22 medical records. And didn't say nothing after that.

23 Q. Who didn't say nothing?

24 A. No one said anything.

25 Q. Okay.

1 A. So next day following I went -- because
2 supposed to have a two-day interview so I went to -- no
3 one said anything we're going to have a second day
4 interview or not so I had to schedule patients for me
5 anyway. So I went to human resources personnel and
6 said, hey, are we still doing interviews. Can I
7 schedule patients. And, plus Dr. Don Lee was one of
8 my --

9 Q. Say that name again.

10 A. Dr. Don Lee was a limited term dentist working
11 at CIM. He came to me and wanted me to find out if he's
12 still going to be able to work at CIM or not. I said I
13 don't know. I will go to personnel and find out.

14 Q. So you have two issues. Number one, you didn't
15 know if you were going to have a second round of
16 interviews and whether you could schedule patients.
17 And, number two, you had this interim term dentist
18 working for you that didn't know if he was still going
19 to be employed there. There was two problems you had to
20 clear up with HR?

21 A. Yes.

22 Q. All right. So go ahead.

23 A. So Ms. Serrato, I walked in --

24 Q. Mr. who?

25 A. Ms. Belinda Serrato.

1 Q. Spell?

2 A. S-E-R-R-A-T-O.

3 Q. And who was she?

4 A. She was the one in personnel.

5 Q. She was an HR person?

6 A. Yes.

7 Q. Okay. Go ahead.

8 A. Told me there's no more interview because they
9 all canceled and that the CEO has already signed off on
10 someone.

11 Q. Okay.

12 A. And then she said we cannot -- I asked her
13 about Don Lee. She said, no, we're not going to be
14 extending the limiting term. So I got both of my
15 answers so I was fine with that.

16 Q. Did you have a problem with the applicant being
17 signed off on without anybody talking to you about it?

18 A. Yes.

19 Q. Why?

20 A. That's where I went to Mr. Escobell's office to
21 try to -- basically when I walked in the office I guess
22 Ms. Serrato went --

23 Q. Mr. who?

24 A. Ms. Serrato went and called the CEO so by the
25 time I arrived in Mr. Escobell's office --

1 Q. She -- in other words, she called him and told
2 him you were coming?

3 A. I don't know if she told him I was coming but
4 she told him I was in her office.

5 Q. Okay.

6 A. But I was in her office basically found out if
7 we were doing second day interviews or not and also find
8 out if we have a limited term position or I had to tell
9 Don Lee that he's no longer going to be needed.

10 Q. Slow down a little. Go ahead.

11 A. When I went to Mr. Escobell's office, first
12 thing he said, "What are you doing in personnel asking
13 about HPMIII position?"

14 Q. That was Don Lee?

15 A. No, no, no, Mr. Escobell.

16 Q. No, I know. But the HPMIII position was
17 Mr. Don Lee; right?

18 A. No. Dr. Don Lee is the limited term dentist --

19 Q. The HPMIII is the one that they just hired?

20 A. Well, they -- he signed it off.

21 Q. Okay.

22 A. Okay. It's Debra Logan is the one he picked.

23 Q. That's the HPMIII?

24 A. Yeah. And she works in medical records at CIM.

25 Q. And you had advised against her because she

1 wasn't very cooperative and cordial; is that what you
2 said?

3 A. Well, beforehand there were a lot of applicants
4 who wanted to apply and said I don't want to apply
5 because I heard that the position's already spoken for.
6 And I told them I said that's not true because it's a
7 fair system. It's subject to the best qualified
8 candidates.

9 Q. I understand. But you did say that you advised
10 against Ms. Logan because she wasn't personally
11 appropriate for the job; is that fair to say?

12 A. Yes, because there was a better candidate who
13 had dental experience. She had no dental experience.

14 Q. Fine, fine, fine. But that was your advice to
15 Mr. Escobell on the interviews and somehow without
16 saying anything to you, he hired Ms. Logan anyway. You
17 had a problem with that?

18 A. We never tabulate the scores, we never even had
19 a discussion because we didn't finish interviewing yet.

20 Q. But that was the nature of a problem you had
21 with Mr. Escobell is he picked her over your advice and
22 without going through all the proper channels and
23 without telling you; is that fair to say?

24 A. Yes. And then Ms. Logan, the day after the
25 interview, she come and ask me, "Well, who" -- came up

1 to me and said, "Well, who says I was rude to them?" So
2 somehow that question got out back to her.

3 Q. So they gossiped about you?

4 A. Yes.

5 Q. When you walked into Mr. Escobell's office he
6 said what are you doing down in HR?

7 A. Yes.

8 Q. And then what happened?

9 A. He blew up.

10 Q. When you say that, did he yell and scream at
11 you?

12 A. Pretty much. He said, "I'm the hiring
13 authority. What are you doing questioning" and I just
14 walked out.

15 Q. Okay. So is all the problems that you have
16 that you can remember with Mr. Escobell contained in
17 your letter to Mr. Herrick and Dr. Lissy that we don't
18 have a copy of yet and these notes we've marked as
19 Exhibit A?

20 A. I'm not sure if Dr. Lissy has all these notes.

21 Q. No, no, no. What I'm getting at is I'm trying
22 to -- I'm here to gather evidence and information.

23 A. Yes.

24 Q. So right now we marked as Exhibit A, we've got
25 a six-and-a-half-page set of notes. I'm assuming

1 there's a lot about Mr. Escobell on here; is that
2 correct?

3 A. Yes.

4 Q. And then you have also told me that you had the
5 letter you wrote to Mr. Herrick and to Dr. Lissy after
6 Mr. Escobell started your relationship off by giving you
7 an IDP plan with two Ns on it without ever having been
8 there a year. So right now I know about that letter to
9 Mr. Herrick that we don't have a copy of right now and I
10 have your notes that we've marked as Exhibit A and I'm
11 asking you if those documents contain all of the
12 problems that you had with Mr. Escobell while you were
13 at Chino?

14 A. Yes. And the letter to Mr. Herrick only
15 applies to IDP.

16 Q. I understand.

17 A. Okay.

18 Q. All right. But there's no other major
19 incidents or problems that you had with Mr. Escobell
20 that are not contained in Exhibit A or the letter that
21 you wrote to Mr. Herrick; is that right?

22 A. Major one is the second paragraph.

23 Q. On what page?

24 A. On the second page.

25 Q. So I'm going to page 2 and on Exhibit A I'm

1 going to read, "Date: April 21st, 2017, extremely
2 stressed, location, Mariscos La Brisas, Chino," that's a
3 Mexican restaurant?

4 A. Right across the street.

5 Q. And it says "Lunch with Dr. Muhammad Farooq,
6 M.D. and Mrs. Muhammad Farooq and Mr. Escobell." Tell
7 me about what happened on that incident?

8 A. Mrs. Farooq was going to be her last day so I
9 told them in advance a week ago I would take her out to
10 lunch.

11 Q. She was a nurse, a dentist or what?

12 A. I think she was a social worker.

13 Q. But she worked in your department?

14 A. No, she worked in healthcare.

15 Q. Okay. How did you know her?

16 A. Met her through Dr. Farooq. I knew her
17 husband.

18 Q. You knew -- Muhammad Farooq was a personal
19 friend of yours?

20 A. No, he's the chef medical executive at CIM.
21 He's the CME.

22 Q. Okay.

23 A. And it's his wife so basically I said, oh,
24 okay, like take out a lunch before her last day. And
25 then the last minute he asked can I bring the CEO with

1 us for lunch.

2 Q. How did you feel about that when he said that?

3 A. I had no choice.

4 Q. I understand. But I'm assuming it made you

5 feel bad or you didn't like that?

6 A. No, I didn't care for that.

7 Q. Okay.

8 A. Okay.

9 Q. But you went along anyway?

10 A. I paid for everybody's lunch including his.

11 Q. So what happened?

12 A. We were talking normal conversation. Mr.

13 Escobell was sitting to the right of me. Dr. Farooq was

14 sitting in front of me and his wife was sitting to the

15 right -- to the left of him. Suddenly he just really

16 hard hit me in the face, really hard.

17 Q. Let the record reflect that Mr. SooHoo is

18 looking at me in the face and he took his --

19 A. Left.

20 Q. -- left arm and hand and he threw it back over

21 him as if somebody is backhanding somebody. Is that

22 what you were doing?

23 A. That's what he was doing.

24 Q. I understand. But you're demonstrating this as

25 what he did to you?

1 A. Yes.

2 Q. He backhanded you with his hand?

3 A. Yes.

4 Q. Were you all drinking?

5 A. No.

6 Q. So as far as you know --

7 A. Just water.

8 MR. COHEN: Water, tea.

9 BY MR. TAYLOR:

10 Q. Was there any tequila, any margaritas at the
11 table?

12 A. No.

13 Q. Okay.

14 MR. COHEN: No alcohol?

15 THE WITNESS: No, I don't drink.

16 BY MR. TAYLOR:

17 Q. I'm trying to get this down to a -- let's call
18 that a street recognition. Okay? So is Mr. Escobell --
19 is he older or younger than you?

20 A. I don't know.

21 Q. Is he bigger or smaller than you?

22 A. Bigger.

23 Q. And is he an athletic kind of guy? Do you know
24 if he's a big, athletic, aggressive kind of guy?

25 A. He's aggressive, you know. He probably was an

1 athlete when he was younger, you know.

2 Q. And I'm just trying to -- it's such a bizarre
3 thing that you told me that I'm trying to figure out
4 streetwise like how the hell did this happen. All of a
5 sudden you get backhanded and there's no -- there was no
6 liquor involved, no alcohol, as far as you know?

7 A. No.

8 Q. Had you and Mr. Escobell had any blowups or
9 disagreements or problems like that morning before you
10 went to lunch?

11 A. No.

12 Q. How about the day or two before this lunch
13 incident. Had you had any blowups or problems with him
14 then?

15 A. Just what I already told you.

16 Q. I understand. At this lunch before he
17 backhanded you was somebody telling you jokes?

18 A. No.

19 Q. Well, was Mr. Escobell saying anything before
20 he backhanded you?

21 A. I don't remember.

22 Q. Had you been saying something -- were you
23 saying anything to anybody at the table before Mr.
24 Escobell backhanded you?

25 A. No.

1 Q. Do you know if Dr. Farooq was friends with Mr.
2 Escobell as you sat there at the table, as opposed to
3 just being professional colleagues?

4 A. Can you repeat that question.

5 Q. Do you know -- as you sat there at the table,
6 do you think whether or not Mr. Escobell was personal
7 friends with Dr. Farooq as opposed to just being
8 professional colleagues?

9 A. I don't know.

10 Q. I'm trying to figure out what would lead to
11 this sudden bizarre act of slapping you, backhanding
12 you. There's no arguments, no alcohol, nobody is
13 telling off-colored jokes. I'm trying to look at
14 whether or not Dr. -- Mr. Escobell had been telling
15 Dr. Farooq things. In other words, they had been
16 talking about you before you went to lunch so that Mr.
17 Escobell was fired up about something. Do you know if
18 there was anything like that?

19 A. I don't know.

20 Q. What happened after Mr. Escobell slapped you?

21 A. The only thing I heard was his wife, first one
22 that said something was, "Why did you hit him and why
23 did you hit him so hard?"

24 And then I looked at Mr. Escobell and I moved
25 away like this and he just snickered.

1 Q. Okay.

2 A. And I looked at Dr. Farooq and he was just
3 shocked.

4 Q. Okay. Did you say anything?

5 A. There were a lot of people in that restaurant
6 and I got up and I almost -- but I -- I -- and I --
7 because I've been in high stress situation, I said let
8 me -- then I took some deep breaths. And I relaxed.
9 And there was so many people there I didn't say
10 anything. So I just paid and I left.

11 Q. You paid the bill and you left -- and you left
12 them at the table?

13 A. Yes.

14 Q. Okay. So he hit you in the cheek?

15 A. In the face.

16 Q. I know. Your cheek's on your face; right?

17 A. Right in front.

18 Q. He hit you in the forehead?

19 A. On my face.

20 Q. So that's your cheek?

21 A. Yeah, yeah.

22 Q. Can we agree that's your cheek?

23 A. Yes.

24 MR. COHEN: Is that where he hit you, in the
25 cheek, not the forehead?

1 THE WITNESS: Yes.

2 BY MR. TAYLOR:

3 Q. That's on your right-hand side?

4 A. Uh-huh, yeah.

5 Q. Did you go in the bathroom and see if there was
6 a red mark or anything like that?

7 A. No.

8 Q. How were you dressed? Were you in a suit or
9 your work clothes?

10 A. Shirt and tie.

11 Q. And, you know, sometimes you got hit in the
12 cheek, your -- the inside of your cheek gets cut by your
13 teeth. Did anything like that happen?

14 A. I don't remember.

15 Q. Was there any blood at all?

16 A. No.

17 Q. Did Mr. Escobell have a ring on his finger?

18 A. I don't know.

19 Q. Were there cuts or bruises on your face
20 anywhere?

21 A. No.

22 Q. Did Mr. Escobell respond in any way when Mrs.
23 Farooq said why did you hit him and why did you hit him
24 so hard?

25 A. Just snickered.

1 Q. Do you remember what the topic of conversation
2 was before he hit you?

3 A. No, we always just have just general
4 conversations, you know.

5 Q. Okay. So, but her statement to you -- I mean,
6 I can imagine in an alarming situation like that that
7 sometimes words are imprinted in your mind forever. Are
8 you sure those are her exact words?

9 A. That's in my mind that's what she said.

10 Q. At any time after that up until today have you
11 ever discussed this with either of the Farooqs and by
12 any means, whether casual conversations, texting,
13 e-mails, phone calls, letters, have you ever discussed
14 that with them up to this day?

15 A. No, except for that day after he came and
16 talked to me.

17 Q. Who's "he"?

18 A. Dr. Farooq.

19 Q. Okay. So we'll get to that in a second. So
20 the only time that you -- this is ever discussed with
21 either one of the Farooqs was the next day when he came
22 and talked to you about it?

23 A. Yes.

24 Q. I'm looking on page 2 of Exhibit A at the
25 bottom paragraph that says February 1st, 2017, to

1 November '17 highly stressed or was it in the paragraph
2 above that?

3 A. No, it's right there on April 21st, 2017, "Dr.
4 Farooq the next day came and spoke to me."

5 Q. Okay. All right. And you say in here, "Dr.
6 Farooq was afraid I would file assault charges." You
7 said that, but what did Dr. Farooq say or do to you
8 that -- I mean, I'm not saying you're not right, but
9 what did he say to you that made you say that, that he
10 was afraid you were going to file assault charges?

11 A. I could tell in his facial expression and his
12 eyes because I think he was afraid to -- that he would
13 have to reassume the position of CEO, which he didn't
14 because when Herrick left he was interim CEO for like --

15 Q. Farooq?

16 A. Yes.

17 Q. Okay.

18 A. For, like, four or five months until Mr.
19 Escobell showed up.

20 Q. All right. So, but Dr. Farooq, did he say
21 anything about Mr. Escobell like he was drunk or
22 stressed out or I chewed him out after you left,
23 anything like that?

24 A. No, he stated exactly what I wrote.

25 MR. COHEN: Can I see it?

1 THE WITNESS: Sure.

2 BY MR. TAYLOR:

3 Q. Okay. So Mr. SooHoo, I know we all have our
4 own personalities and how we deal with things like that,
5 but this is a pretty, you know, this is a pretty extreme
6 incident, shocking. And I've read the paragraph there
7 on page 2 and it seems like you never took any action
8 after that, like you didn't call the police, you didn't
9 go to --

10 A. I had so much respect for Dr. Farooq and he
11 said, "Just let it go." And I can -- he didn't come out
12 and say it; I can tell it's hidden in between the lines.

13 Q. I understand.

14 A. And so I -- I wasn't bleeding, but I -- every
15 time I saw him --

16 Q. Saw who?

17 A. Mr. Escobell.

18 Q. Uh-huh.

19 A. I avoided him.

20 Q. All right. Had Mr. Escobell, as far as you
21 know, ever threatened you before that incident at the
22 Mexican restaurant in any way?

23 A. No.

24 Q. Had he ever exhibited any kind of aggressive,
25 dangerous behavior towards anybody, whether, you know,

1 that you heard about through gossip or you saw yourself
2 or anything like that before this incident at the
3 Mexican restaurant?

4 A. I heard through gossip that he chewed out the
5 chief a Ill and he retired. They got in a big argument
6 and so he's had -- through gossip I heard if he don't
7 like you, that's it.

8 Q. "He," meaning Mr. Escobell?

9 A. Yes. And he's very egotistical. You'll know,
10 he likes power.

11 Q. Okay. All right. So after the conversation
12 with Dr. Farooq when Dr. Farooq came to visit you the
13 next day, as you put it down on page 2 of Exhibit A,
14 would it be fair to say that up until today you've never
15 done anything about responding to Mr. Escobell's assault
16 on you. Would that be fair to say?

17 A. Yes. And when I did decide, it was too late
18 because you can only file a police report within one
19 year. And by the time I got walked off, I wanted to --
20 I started thinking about it. I said this guy is really
21 after me so I decided to file a police report. They
22 wouldn't take it. I finally talked to an attorney and
23 they said, oh, yes, you can. And I went back and I
24 think I did file and they took the report.

25 Q. You did file a police report?

1 A. Yes.

2 Q. With what county or what city --

3 A. Chino.

4 Q. -- did you file that?

5 A. I have a copy at home.

6 Q. If the day you were walked out of Chino was
7 July 6, 2018, give me an approximate date that you
8 filled out a police report with the city of Chino?

9 A. Maybe five or six months later.

10 Q. Did anything come of that police report? Was
11 there ever an arrest or any charges?

12 A. No.

13 Q. Do you know why?

14 A. They said it had to be within the year.

15 Q. Have you ever -- did you ever think about suing
16 him personally, Mr. Escobell, like for damages in a
17 personal injury civil lawsuit?

18 A. I spoke to Mr. Cohen about that.

19 Q. I'm not allowed to find out words that you
20 exchanged with him.

21 A. Okay.

22 Q. But generally I'm allowed to find out because
23 everybody is going to want to know. It didn't make any
24 sense that you would never take any action. What did
25 you decide ultimately about filing a civil lawsuit

1 against him?

2 A. I'm waiting to see if there's any charges on
3 this first.

4 Q. From the police report?

5 A. No, the outcome on the internal affairs
6 investigation, on Mr. Escobell.

7 Q. So right now, as far as you know, there's an
8 internal affairs investigation going?

9 A. They wrote me a letter.

10 Q. Who's "they"?

11 A. Mr. -- internal affairs said they wrote me a
12 letter saying that they were referring me to the hiring
13 authority. I don't know who that is.

14 Q. So they referred the incident where Mr.
15 Escobell hit you to the hiring authority?

16 A. In my report to the -- to the hiring authority
17 and they would make the decision whether they are going
18 to do their investigation or not.

19 Q. So you made another report to internal affairs
20 with Chino, the prison?

21 A. Internal affairs is basically the CDCR's
22 internal affairs.

23 Q. I understand. When you say "report," you told
24 me about a police report?

25 A. Uh-huh.

1 Q. I know that.

2 A. Yes, and I filed a report with internal
3 affairs.

4 Q. And so using the date of July the 6th, 2018,
5 when did you file the report with internal affairs?

6 A. December of last year. December of 2018.

7 MR. COHEN: 2018 or 2019? You said last year.
8 Last year is 2019.

9 THE WITNESS: I think it was '18. I'm not -- I
10 have to get it. I'm not sure. I think it was.

11 BY MR. TAYLOR:

12 Q. Well, December of 2019 was just, like, three
13 months ago. December 2018 would be a year and three
14 months ago.

15 A. Eighteen.

16 Q. So December of 2018 and right now as far as you
17 know that's still pending, you haven't heard anything?

18 A. I don't know if the hiring authority is
19 going -- because all investigations have to be
20 authorized by the hiring authority.

21 Q. I understand.

22 A. So basically if they're trying to cover up for
23 him, they just don't order the investigation.

24 Q. As far as you know today, is Mr. Escobell still
25 in his position as CEO of Chino?

1 A. Yes.

2 Q. Okay. All right. Now, let's -- I have --

3 let's go off the record a second.

4 (Off the record.)

5 (Record read.)

6 BY MR. TAYLOR:

7 Q. Mr. SooHoo, I'm thinking about you working at
8 your new position in Regional 4. Have you chosen to be
9 confidential and quiet about this incident when you're
10 at work as far as telling other people at work?

11 A. I don't talk about it.

12 Q. Okay. Does anybody else talk about it at work?

13 A. They don't talk about it to me.

14 Q. Okay. All right.

15 A. I wouldn't know.

16 Q. And so -- wow. Is there an EEOC investigation
17 that was opened up or any kind of union investigation
18 opened up or any other kind of investigation opened up
19 other than the internal affairs report that you filled
20 out?

21 A. Not that I know of.

22 Q. Okay. So this incident happened, the face
23 slapping incident happened in -- on April 21st of 2017
24 and you ended up leaving there when you got walked out
25 on July the 6th, 2018; is that correct?

1 A. Yes, sir.

2 Q. So that is about a year and three months you
3 were still there after this face slapping incident
4 happened; is that correct?

5 A. Yes, sir.

6 Q. Have you -- have you filled out Exhibit A with
7 everything significant that you can remember as far as
8 dealing with psychological stress and the relationship
9 with Mr. Escobell while you were still there in that
10 year and three months?

11 A. So what is the question?

12 Q. Well, I'm just trying to collect everything
13 about your psychological claims as far as, you know, the
14 environment and the things that happened. Obviously Mr.
15 Escobell's a major part of that, according to what
16 you've told me so far. I know that you've told me there
17 was also a workload problem and also that -- I've gotten
18 the idea there was some other people that you were not
19 really on good relations with either, some other staff.
20 But Mr. Escobell seems to be one of the major players in
21 this problem; is that correct?

22 A. Yes, because he's my boss. He has to either
23 support me or, you know.

24 Q. So I'm just wondering if there's any other --
25 since you filled out Exhibit A, which is November 7th of

1 2018, is there any other major incidents with Mr.
2 Escobell or major circumstances related to Mr. Escobell
3 that you've remembered that you have not added to it in
4 any other memos or notes?

5 A. There's two other incidents that are on here,
6 though, if you want me to discuss it, that I felt it was
7 very important, very stressful.

8 Q. When you say "on here" you mean Exhibit A?

9 A. Yes.

10 Q. Two other incidents. So they happened after
11 the April 21st, 2017, face slapping incident?

12 A. Well, yes. It happened in 2017. Especially
13 with my supervising dental assistant being gone, it took
14 tremendous amount of stress for me to supervise 16
15 dental assistants on top of all my responsibilities and
16 also my dentist and hygienist. That's a tremendous
17 amount of stress.

18 Q. Why were all the other supervising dentists
19 gone?

20 A. What do you mean?

21 Q. You said that there were other supervising
22 dentists that normally would have helped you with the
23 workload?

24 A. There's only one supervising dentist at CIM.

25 Q. Okay.

1 A. There's -- the rest of them are dentists,
2 dental hygienists and dental assistants.

3 Q. Let's clarify something then. When you
4 mentioned that before, when we started talking about Mr.
5 Escobell?

6 A. Uh-huh.

7 Q. You said one of the problems that you had at
8 Chino was the stress of the workload and that they had
9 gotten -- there was no other supervising dentists there.
10 Now I may have incorrectly assumed that the stress
11 load -- stress of the workload and the absence of the
12 other supervising dentists was related. In other words,
13 that had there been other supervising dentists there,
14 they would have divided the workload up with you. But
15 now what you're telling me sounds like that assumption
16 is incorrect. Am I incorrect on that?

17 A. You're incorrect. There's only one supervisor
18 per institution.

19 Q. When I asked you about stressful circumstances
20 why did you mention missing supervising dentists, they
21 were no longer there? What did they have to do with
22 your stressful situation?

23 A. I meant supervising dental assistant.

24 MR. COHEN: He wasn't talking about him. He's
25 talking about a different position.

1 THE WITNESS: Supervising dental assistant.

2 BY MR. TAYLOR:

3 Q. So there were missing supervising dental
4 assistants?

5 A. Yes. She was out on -- I think she was out on
6 workman's comp for almost a year.

7 Q. What's her name?

8 A. Rowena Sam.

9 Q. And her being absent added to your workload?

10 A. Yes.

11 Q. How so?

12 A. Because the scheduling had to do with
13 inventory. All that is under the supervising dental
14 assistant.

15 Q. Okay. So you -- you literally had to take on
16 her job, too?

17 A. Pretty much because a limited term one coming
18 limited term or acting, they don't know the protocols.

19 Q. Did they ever replace her with limited term?

20 A. No, just acting. And then once you pull
21 someone who is already a dental assistant as a acting,
22 then you are short a dental assistant. And on top of
23 the problems at CIM, 70 percent of my dental assistants
24 were on FMLA. So half the time I never knew who was
25 coming or going.

1 Q. When you say FMLA, you mean they were pregnant?

2 A. Family Medical Leave Act.

3 Q. I understand what that is.

4 A. Yeah.

5 Q. Do you mean these women were having babies or
6 sick or taking care of their parents?

7 A. I don't know because they don't tell you what
8 the problems were. When you get signed off on FMLA it
9 gets approved through the doctors and they're allowed to
10 take those time. So I -- I don't know what the reasons
11 are.

12 Q. Okay. So you're saying that a big part of your
13 stress was the extra work that was put on you by
14 supervising dental assistants being out on workers' comp
15 and not replaced and other people out on FMLA and not
16 being replaced. And, therefore, there was a lot of job
17 duties and things that had to be done that you had to
18 do --

19 A. Uh-huh.

20 Q. -- to make up for their absence. Is that what
21 you're saying?

22 A. Uh-huh, yes.

23 Q. This is all happening in 2017 and 2018?

24 A. Uh-huh.

25 Q. Is that a "yes"?

1 A. Yes.

2 Q. And what did you do, didn't you ever go to
3 management and say I can't do this. This is killing me?

4 A. Yes, they said you have an acting, but the
5 acting doesn't really do the job because --

6 Q. What do you mean when you say you have an
7 acting?

8 A. You get -- they put a position in there, but
9 they don't know what to do.

10 Q. They put an acting person in to replace the
11 missing person?

12 A. Yes.

13 Q. We have to say it on the record.

14 A. Yes.

15 Q. So what you're saying is they would -- on paper
16 they would cover this missing position with an acting
17 position, but in reality it would not -- it would not
18 fix the problem because the acting person didn't know
19 what to do?

20 A. Yes.

21 Q. That happened regularly?

22 A. Yes.

23 Q. And did you bring that to their attention, that
24 these acting people are not able to pick up and cover
25 the workload because they don't know what to do?

1 A. That's the best they can do. That's what they
2 tell you.

3 Q. Okay. Did you have a contact person that you
4 were always going to at human resources or personnel
5 that you were talking about this staffing shortage?

6 A. In reality that part is supposed to belong to
7 the HPMIII.

8 Q. What part is?

9 A. Administration part, staffing. They were
10 supposed to go and work with human resources because the
11 supervising dentist reason -- we're supposed to do
12 50 percent clinical and a lot of the administrators are
13 supposed to be taking over the HPMIII.

14 Q. What's an HPMIII?

15 A. Health program manager.

16 Q. And who was doing that?

17 A. Ms. Logan who just got hired, didn't know what
18 to do.

19 Q. Okay. Did you get along with Ms. Logan? Did
20 you have any problems with Ms. Logan as far as getting
21 along with her or having clashes with her or anything
22 like that?

23 A. She probably had more problems with me because
24 from day one I told her she was not my pick because
25 there was another person who had more experience that

1 would have fit in. She already worked in headquarters
2 and already knew the job. She had no experience.

3 Q. Let's put this way. If I was your psychiatrist
4 and you were talking to me about all your work problems
5 and all the people you had problems with, I know you
6 talked about Mr. Escobell. I get that. Would Ms. Logan
7 be one of the people you talk about about your work
8 stress?

9 A. Yes, it's not so much her, it's just that she's
10 new in dental and she didn't know what to do yet.

11 Q. Did you get along with her? I mean, did she
12 treat you nicely like she liked you or respected you or
13 was she mistreating you in any way?

14 A. In front of me she's always nice to me but I
15 don't know how she presented herself about me. Other
16 people tell me she's not supportive of you.

17 Q. Did she ever go out on workers' comp or FMLA?

18 A. No.

19 Q. She was always there?

20 A. Yes.

21 Q. She wasn't one of the missing people?

22 A. No.

23 Q. So the day you got walked out she was there?

24 A. Yes.

25 Q. So when you talked to me about Ms. Logan, there

1 was also a staffing shortage. Can we agree that what we
2 have been discussing about these missing supervising
3 dental assistants and these other ones out on FMLA, we
4 will just call that a staffing shortage problem?

5 A. Yes.

6 Q. I heard now about some of the Mr. Escobell
7 problems and I've heard about Ms. Logan who wasn't
8 really doing a great job and the staffing shortage?

9 A. And Rowena Sam who is never there.

10 Q. Who is that?

11 A. She's the supervising dental assistant that
12 went out on workers' comp for nine months and then she
13 came back for one month then go out for another nine.
14 She's gone again.

15 Q. Right, but she's part of the staffing shortage;
16 right?

17 A. She's a supervisor.

18 Q. I understand. Well, okay. Fair enough. But
19 Rowena Sam was just part of a whole personnel shortage
20 problem?

21 A. Yes.

22 Q. Had Rowena Sam been there, she could have done
23 something about the staffing shortage problem?

24 A. Because a doctor doesn't -- cannot work in
25 their bar unit if they don't have a dental assistant.

1 So I told her instead of sitting in your office you need
2 to assist the doctor to see the patient.

3 And she, point blank in front of two other
4 dentists, said, "Well, you tell me to go assist again, I
5 will file stress on you and I'm going to go out stress
6 on you again."

7 Q. Who told you that?

8 A. Ms. Rowena Sam.

9 Q. All right. Got you. All right. Okay. So
10 let's go --

11 A. The last -- the one thing about -- the last
12 thing about Mr. Escobell is that he had a meeting --

13 Q. Okay. Show me the page of your notes where
14 you're talking about?

15 A. Okay. All right.

16 June 18, the month before I got walked off.

17 Q. Hold on. Hold on. Okay. So --

18 A. June 18.

19 Q. -- I've marked this as page 5. It says,
20 "June 18th highly stressful."

21 It's in the middle paragraph on that page; is
22 that right?

23 A. Uh-huh.

24 Q. Is that a "yes"?

25 A. Yes.

1 Q. Okay. So is this an incident involving Mr.

2 Escobell?

3 A. Yes.

4 Q. So tell me what happened?

5 A. And Jason Bishop AW, who is the head of EEO.

6 Q. What does AW stand for?

7 A. Associate warden.

8 Q. So he's also the EEO coordinator?

9 A. Yes.

10 Q. So, in other words, I know what EEO is. I know
11 that oftentimes it's the EEO person that you're supposed
12 to go to when you're mistreated on the job; right?

13 A. Uh-huh.

14 Q. Is that a "yes"?

15 A. Yes.

16 Q. All right. So I take it that Mr. Bishop became
17 part of one of these scenarios that somehow you had
18 gotten Mr. Bishop involved in some of your problems with
19 Mr. Escobell and the other problems?

20 A. Mr. Escobell --

21 Q. Is that a true or not, what I just said?

22 A. Yes.

23 Q. I'm trying to organize this.

24 A. Uh-huh.

25 Q. So Mr. Bishop came into your world, at least in

1 part, because you brought some of these problems to him.

2 Is that fair to say?

3 A. I didn't bring any of those problems to him.

4 Some staff may have brought problems to him.

5 Q. Okay. So you didn't report any of your

6 problems to Mr. Bishop, you believe that other staff

7 reported their problems to him?

8 A. Yes.

9 Q. So go ahead. Explain this incident.

10 A. EEO is supposed to be confidential and supposed

11 to be filed individually.

12 Q. All right.

13 A. He had a meeting with the whole staff and gave

14 them --

15 Q. Mr. Bishop?

16 A. Bishop and Escobell. I have a feeling Bishop

17 would not have done it without the approval of the

18 hiring authority, which is Mr. Escobell. And announced

19 to the whole staff are there any EEO issues against

20 Dr. Soohoo?

21 Q. They did that publicly?

22 A. In public. It stressed me out because staff

23 came and talked to me, said, hey, it was about you.

24 They gave us blank pieces of papers to fill out on you.

25 That stressed me out because that's -- where my rights.

1 And that's supposed to be filed individually.

2 Q. Okay. Did you -- and that happened on June 18,
3 2018?

4 A. Yes.

5 Q. Where were you when they had that meeting?

6 A. In the morning huddle -- I usually have morning
7 huddles with my dentists and the hygienist. He called
8 me in and he says I --

9 Q. Who's "he"?

10 A. Mr. Escobell said come to my office. We're
11 going to meet with your dental staff. And Mr. Jason
12 Bishop, Mr. Escobell left and met my whole staff and
13 gave them blank pieces of paper to fill out.

14 Q. So Mr. Escobell called you to go to his office?

15 A. And I stayed there.

16 Q. In the meantime, they had a meeting without you
17 being there, somewhere else?

18 A. Yes.

19 Q. And when you got to Mr. Escobell's office he
20 was not there obviously; right?

21 A. No. He was waiting at the front of the PK
22 where we had our morning huddles and told me to go to
23 his office and stay at his office.

24 Q. So he told you to go there. You then realized
25 that they were going to have some kind of meeting

1 without you?

2 A. Yes.

3 Q. You since learned that Mr. Escobell sent you
4 there to get you away from the meeting so they could
5 have the meeting without you being there?

6 A. Yes.

7 Q. And did you have any idea what was going on
8 when he sent you to his -- when Mr. Escobell sent you to
9 his office?

10 A. I assumed it was about me because they didn't
11 want me there.

12 Q. Okay. And then how long did the meeting take
13 place that morning?

14 A. I have no idea.

15 Q. Well, you were in his office, I mean --

16 A. Probably 40 minutes, an hour.

17 Q. Then when is the first time you found out what
18 had happened after that 40 minutes or an hour? Did
19 somebody come running up to you?

20 A. Yeah, staff.

21 Q. Who was it?

22 A. A lot of staff. I don't remember anymore.

23 Q. Did you feel they were supportive of you or
24 they were just kind of telling you?

25 A. They were very supportive of me.

1 Q. But they explained to you what had happened at
2 the meeting with that group?

3 A. They just basically -- they gave them blank
4 pieces of paper to fill out and wanted them to put down
5 any EEO issues against me.

6 Q. What I'm talking about is when the staff came
7 up to you afterwards and told you what happened. Did
8 they just -- they told you what had taken place at that
9 meeting?

10 A. Yes.

11 Q. And when they were telling you this, did you
12 feel supported by them or neutral or did you feel like
13 they were trying to help you?

14 A. I think they were supportive of me.

15 Q. So what did you do, did you take any action
16 about that?

17 A. I documented it when I got back to my office.

18 Q. Where did you document it?

19 A. On a piece of paper.

20 Q. A memo of some kind?

21 A. Uh-huh, that's how I formulated this.

22 Q. Do you still have that memo anywhere?

23 A. No, because they were scratch paper. When I
24 put it on there I probably threw it away.

25 Q. You wrote down a memo on scratch paper for

1 notes and then later you typed that into Exhibit A?

2 A. Yes.

3 Q. Okay. All right. But did you take any
4 official action as far as putting in any complaints or
5 calling human resources or filing a grievance of any
6 kind?

7 A. I couldn't because Mr. Bishop was the EEO
8 coordinator and he was there. So who do I -- where do I
9 go. Just like when I filled to internal affairs, the
10 system is that if you -- it comes right back to the
11 hiring authority to the CEO and then later on after the
12 investigation it still comes back to the CEO to
13 determine what they're going to do to you.

14 Q. So what you're telling me is that you felt like
15 if you tried to take any action you would literally be
16 seeking relief from the very people that did the bad
17 things to you?

18 A. Exactly. That's why I wanted to go to internal
19 affairs in Rancho Cucamonga so it's in the Sacramento.
20 Sacramento turned around and send it back to locally.

21 Q. At any point when this stuff was happening to
22 you, and again I'm kind of using my imagination here and
23 thinking street common sense, if I have this -- I can
24 imagine being in this history of all this outrageous
25 stuff happening to you through your supervisors at the

1 workplace, and then during that time trying to ask
2 around what is wrong with my supervisors. Why do they
3 seem to hate me so much. Did you ever do anything like
4 that, try to find out why is this going on. I never
5 knew this man before and he seems to hate me from the
6 very beginning. He's got it in for me. Somebody in
7 management is trying to get me fired or get me to quit,
8 did you ever do anything like that?

9 A. Yes, I've been -- like I said before, you know,
10 it dawned on me and I'm trying not to make trouble so
11 basically I didn't -- I documented it, but I didn't know
12 where to go with it.

13 Q. Okay. Besides not knowing where to go with it,
14 would you agree or would you say that you were afraid to
15 do something because you thought that they would fire
16 you if you did something?

17 A. There's always that fear, but I don't fear that
18 because I know I was right. I didn't do anything wrong
19 so that's why I don't fear that part. It's that with
20 all the stress that I already have, I didn't know if I
21 wanted to add more stress because every time you file
22 stuff it adds more stress to you. I already have -- you
23 already know my medical conditions. I don't want to go
24 through all of that.

25 Q. Did you ever go to an employment lawyer? I

1 know you got a workers' comp lawyer here, but did you
2 ever go to an employment lawyer at any time?

3 A. Yes.

4 Q. Okay. When was that? Using these dates that
5 we have here on Exhibit A, you know, now we're up in
6 June of 2018 and July of 2018, using those dates when
7 did you go to an employment lawyer?

8 A. Probably a month after that and --

9 Q. After what?

10 A. After July 6, 2018.

11 Q. Okay. And you -- was this employment lawyer
12 somebody that you knew in Buena Park or Chino or Rancho
13 Cucamonga?

14 A. I went to several.

15 Q. In what area?

16 A. I think I spoke to -- here in San Diego through
17 Mr. Cohen and I spoke to another one in Temecula and I
18 spoke to another one up north.

19 Q. Was your intention to have them protect you or
20 were you thinking about filing some kind of lawsuit
21 against them?

22 A. Both.

23 Q. And again, I can't get into the specific words
24 that you exchanged with your lawyers, but I can find out
25 about the outfall of the meetings. After meeting or

1 talking to these lawyers, did you make any decisions?

2 Did they agree to take your case or anything like that?

3 A. It was my decision to wait and see what

4 internal affairs' outcome would be.

5 Q. So as you're sitting here now, you are telling

6 me that you still may go to a civil employment lawyer

7 and file a lawsuit?

8 A. Yes.

9 Q. Okay. Do you have a lawyer that -- right now

10 that you got, you know, you're going to hire? Is there

11 one you have chosen?

12 A. No. As far as I have several because basically

13 depending on what the charges are and what the -- I

14 mean, what the charges are.

15 Q. The charges that come out of the internal

16 affairs?

17 A. Yes.

18 Q. Is this internal affairs -- as far as you know,

19 is this something that you're charging or something that

20 CDCR is charging against you?

21 A. No. The one that I filed in the internal

22 affairs against Mr. Escobell I'm waiting for the outcome

23 of that.

24 Q. When you say "the charges," you mean the

25 charges against Mr. Escobell?

1 A. Yes, uh-huh.

2 Q. Okay. All right. Have you -- have they
3 scheduled any hearings? Have you been to any hearings
4 related to the internal affairs investigation?

5 A. Of Mr. Escobell, everything was done on a
6 computer. They sent me questions and . . .

7 Q. When did they send you questions?

8 A. Oh, back in December of 2018 when I filed.

9 Q. Did you keep copies of those questions?

10 A. I'm not sure.

11 Q. Did you answer those questions?

12 A. Yes.

13 Q. Did you keep copies of your answers?

14 A. Some of them. I think I have some of them, not
15 all of them.

16 Q. Okay. That tells me right there that we may --
17 we can't be finished with you then because that's pretty
18 important really. This is all about Mr. Escobell and if
19 there is an internal investigation that's going to --
20 may weigh heavily as to what happens with us meaning in
21 the workers' comp. The questions they sent you and the
22 answers you gave them would be very important to us as
23 well and I'm sure your -- the medical legal doctors that
24 are looking into this case. So we're going to request
25 that you obtain copies of the questions they sent you

1 and the answers you gave them. Okay?

2 A. Internal affair has all of that.

3 Q. Well, you know, I don't.

4 A. Okay.

5 Q. And I -- I know that I can get them through you

6 and your attorney but I'm not sure I can get them

7 directly. I'm not sure. Because even though I

8 represent department of corrections, you know how it is,

9 they decide this is confidential, that's confidential.

10 One department can't get it from another department, you

11 know that; right?

12 A. Yeah.

13 Q. Okay. So let's talk about the July 6 walk out

14 incident. Do you know what I'm referring to?

15 A. Yes.

16 Q. You've got that -- I see that as a paragraph on

17 what I marked as page 5 of Exhibit A and goes on for --

18 well, what you've got on Exhibit 6 is some mentioning

19 about some of your physical injuries, hearing loss, back

20 issues and hand issues. So let's stick with page 5

21 where you have the July 6, 2018. Tell me about that

22 incident.

23 A. I was seeing patients around 12:00 o'clock up

24 to around 11:00, 12:00 o'clock and I get a phone call

25 from him saying, come to my office and --

1 Q. Phone call from who?

2 A. Mr. Escobell.

3 Q. Okay. Let me ask you, at this point anytime
4 you hear from that man do you think there's trouble?

5 A. Yes.

6 Q. Okay. So when you get a phone call from him
7 even before he speaks you are already thinking there's
8 trouble?

9 A. Yes.

10 Q. So go ahead.

11 A. So I immediately told my dental assistant that
12 I'm going to go have a meeting with him, I'll be back.
13 I still had other scheduled patients.

14 Q. Okay.

15 A. And I went in the office. He had a sergeant
16 there.

17 Q. Sergeant who?

18 A. From internal affairs or . . .

19 Q. Go ahead.

20 A. I don't know his name or anything or lieutenant
21 I don't remember. And he asked me to turn in my phone,
22 my set of keys, my ID.

23 Q. When you said "he asked me," you mean Mr.
24 Escobell or the sergeant?

25 A. Mr. Escobell.

1 Q. Okay.

2 A. And you don't give me any choice, but I will
3 have to walk you off and order investigation. And that
4 it's been -- he said it's been approved by Mr. Herrick
5 already, the regional administrator.

6 Q. He's telling you this?

7 A. Yes.

8 Q. Now, when you said he said you don't give me
9 any choice, did you ask him what are you talking about,
10 what have I done?

11 A. Yes, he would not respond. I was just, like,
12 can I have a copy of the -- of the allegation. He goes,
13 nope.

14 Q. Okay. So that tells me -- and correct me if
15 I'm wrong -- that they also started some kind of
16 investigation against you; is that correct?

17 A. Yes.

18 Q. All right. Is that -- do you know if your
19 charges against him and his charges against you are all
20 being considered in the same internal investigation or
21 separate proceedings?

22 A. I do not know.

23 Q. Do you know as of July 6, 2018, when he said
24 you give me no other choice, had you already -- you had
25 not filed your internal investigation report yet, had

1 you, because you did yours in December of 2018; is that
2 right?

3 A. Yes.

4 Q. So there was no internal investigations started
5 by you as of July 6, 2018; correct?

6 A. Correct.

7 Q. He said you give me no other choice, but he did
8 mention something about an investigation going on?

9 A. On me. He going to start an investigation on
10 me.

11 Q. He did say something like that?

12 A. Yes. I got a letter and I sent a copy to my
13 attorney. I was exonerated from the -- from the
14 charges.

15 Q. Oh, okay. Now, I don't know about this.

16 A. Okay. I was exonerated, but then back in -- I
17 came back to work, just in December they --

18 Q. December of what year?

19 A. December of 2019. They said, oh, there's
20 additional charges filed. I said, how come I was never
21 given this. Oh, we -- we need to interview you.

22 Q. Okay. So --

23 MR. TAYLOR: Let's go off the record.

24 (Off the record.)

25 BY MR. TAYLOR:

1 Q. Back on the record.

2 Now I'm -- I don't know. I don't think I ever
3 knew about a letter. I know that there's a thing in a
4 lot of state agencies they send a letter of intent or a
5 notice of adverse action. Was it one of those?

6 A. Against me?

7 Q. Yeah, the letter you said you got a letter.

8 A. I got a letter saying that was all the charges
9 on the first one that they charges, it did not sustain.

10 Q. All right. Hold on. Hold on. So we're
11 getting out of order here because -- all right. So at
12 some point and now I need -- now I'm going to need some
13 dates as best you can. Using Exhibit A as a point of
14 reference for dates, at some point somebody filed
15 charges against you, whether it was Mr. Escobell or your
16 coworkers or everybody. When was that?

17 A. I assume it's before July 6.

18 Q. Okay. Are you telling me July 6 is the first
19 time you were aware that some charges were sent to you?

20 A. No, I knew there were some -- some allegations
21 charging that -- against me that I was yelling at them
22 and because --

23 Q. Okay. So some of your support staff or
24 coworkers had made charges about you that you were
25 yelling at them?

1 A. I wasn't -- I was not yelling, but that's what
2 they were saying.

3 Q. I understood that. When was this, that these
4 charged allegations against you came out? Give me a
5 year.

6 A. 2018.

7 Q. Okay. So 2018. And did you ever learn who was
8 making the allegations against you?

9 A. One was --

10 MR. COHEN: The answer is "yes" or "no."

11 THE WITNESS: Yes.

12 BY MR. TAYLOR:

13 Q. Who was it?

14 A. Nichelle Davis.

15 Q. What was her job and relationship to you? What
16 was her job title?

17 A. Dental hygienist.

18 Q. Was she your direct dental hygienist or
19 somebody else's dental hygienist?

20 A. She worked for CIM and she answered to me.

21 Q. You were her boss. Did you work directly with
22 her in anything during the day or did she work for the
23 dentists?

24 A. She worked for all of us.

25 Q. All right. So Nichelle Davis made allegations

1 against you that you were inappropriate, abusive,
2 yelling and screaming?

3 A. She basically said I was yelling at her because
4 I was just questioning why she was only doing one
5 quadrant SRPs because the OT is complaining to me that
6 they don't know how to schedule her when she only want
7 to do one quad, that meant the patient had to come back
8 four times.

9 Q. What does one quad of an OP [verbatim] mean?

10 A. SRPs.

11 Q. What does that mean?

12 A. Scaling and root planing. In other words, a
13 deep cleaning. You have to anesthetize to do a deep
14 cleaning.

15 Q. When you say "quadrant" you mean literally a
16 quadrant --

17 A. Four quadrants of the mouth --

18 Q. Let me finish. You're killing her. The
19 quadrant, the mouth and the teeth on uppers and lowers
20 are divided up in the dental practice into quadrants and
21 when you're working in those quadrants whatever you're
22 doing, scaling, cleaning, drilling, you talk about those
23 different quadrants; right?

24 A. To a hygienist and cleaning we talk about
25 quadrants.

1 Q. That just means separate sections of the upper
2 and lower teeth?

3 A. Yes.

4 MR. COHEN: Can we take a break.

5 MR. TAYLOR: Take a break.

6 (Off the record.)

7 BY MR. TAYLOR:

8 Q. So what you found -- what you're telling me is
9 that it somehow came to your attention that Ms. Davis
10 was only doing one or less quadrants on patients instead
11 of more and these patients would have to come back more,
12 be rescheduled to come back more times than necessary
13 because she wasn't doing enough quadrants on this
14 patient?

15 A. Yes.

16 Q. And in that conversation she then made up
17 charges against you that she said you were yelling at
18 her?

19 A. Yes.

20 Q. Were there any other charges against you
21 besides what Ms. Davis was saying?

22 A. Well, she also claimed that when she had a
23 canceled patient I yelled at her about not having -- I
24 said go ahead and see the next patient, you know,
25 because inmates are never on time because they can only

1 come when the COs allow them to come out of housing. So
2 basically I said just work on them because what
3 happened, administrators don't like you to -- someone
4 from Sacramento, they don't like you to be sitting there
5 doing nothing.

6 Q. All right. Again, these were charges by
7 Ms. Davis.

8 A. Yes.

9 Q. Was there anybody else making charges against
10 you?

11 A. Yeah, Joy Martin.

12 Q. Spell, please.

13 A. J-O-Y M-A-R-T-I-N.

14 Q. Wonder if that's Dave's wife. Went right over
15 his head.

16 Joy Martin is also a dental hygienist?

17 A. No, she's a dental assistant.

18 Q. Did she join up with Ms. Davis in making these
19 charges or did she file her own separate charges?

20 A. I don't know.

21 Q. Were these charges all coming at the same time
22 in one batch?

23 A. Yes, uh-huh.

24 Q. So and all these charges were being made in
25 2018?

1 A. They all had meetings and they congregated and
2 tried to do it all at once and come back. I have a
3 feeling it's a mutiny and they're trying to collusion to
4 get me all at once. Because the numbers will work
5 against because I've been in the system so long.

6 Q. So it was Nichelle Davis and Joy Martin. Would
7 Joy Martin say you yelled at her or anything?

8 A. I don't even remember what the charges, but
9 those -- those were not sustained as well.

10 Q. I understand. We're getting one at a time.
11 First we have to establish what happened and then we'll
12 talk about the results.

13 A. Uh-huh.

14 Q. Did Joy Martin say you were yelling at her or
15 what did she say about you?

16 A. She said that I moved her from the laboratory
17 to be our -- but that -- and I -- because basically I
18 didn't like her or whatever.

19 Q. Did she ever say you treated her improperly,
20 like yelling or screaming at her?

21 A. I don't remember.

22 Q. Anybody else besides Nichelle Davis and Joy
23 Martin make charges?

24 A. Tammy.

25 Q. Spell, please.

1 A. T-A -- Tammy, oh, she has a difficult name.

2 Q. Was she a dental hygienist?

3 A. Dental hygienist.

4 Q. Okay.

5 A. She claimed that I yelled at her at the meeting

6 and I have witnesses. I did not yell at her at the

7 meeting.

8 Q. Yelled at her. Okay. Anybody else besides

9 Joy, Nichelle and Tammy?

10 A. Rowena Sam, the supervising dental assistant.

11 When she came back to work she claimed that I yelled at

12 her. That's why she's stressed out and she left again.

13 And I told her that she had to assist the dentists.

14 Q. All these charges, was this done in one kind of

15 one big accusation or action again you or did they come

16 at different times?

17 A. I have no idea.

18 Q. At some point you were given notice of these

19 charges; right?

20 A. Those, yes.

21 Q. How did you get notice of these charges?

22 A. Just by a letter from internal affairs.

23 Q. Okay. So a letter from internal affairs. When

24 did this come to you?

25 A. Maybe a couple of months after I got walked

1 off.

2 Q. After you got walked off?

3 A. Yes, uh-huh.

4 Q. After July 6 of 2018?

5 A. Uh-huh.

6 Q. Is that a "yes"?

7 A. Yes.

8 Q. So when you walked in -- when Mr. Escobell
9 confronted you on July 6, 2018, you did not know that
10 these charges had been brought against you?

11 A. Not all of them, no.

12 Q. Okay. I need to know, you know, it's important
13 that I don't want to -- if things were handled --
14 different charges were handled at different times and
15 different ways, I need to know that. Because other than
16 that it sounds like you're putting them all together in
17 one group. So some charges came to your attention
18 before July 6, 2018?

19 A. Yes.

20 Q. What kind of charges were those and who made
21 them and when did they come?

22 A. I told you. Those are the ones that I know of.

23 Q. Nichelle and Tammy?

24 A. Yes. And Joy.

25 Q. And Joy?

1 A. Uh-huh.

2 Q. Those --

3 A. And Rowena.

4 Q. And you knew about that before July 6, 2018?

5 A. I didn't know about Rowena.

6 Q. You knew about the others?

7 A. Yeah, because what happened -- there are more
8 because they had that meeting.

9 Q. I understand. I'm trying to pin down dates and
10 how you found out. That's all. How did you find out
11 about these charges by Nichelle and Tammy and Joy, by a
12 letter?

13 A. By a letter.

14 Q. And but that was before July 6 of 2018?

15 A. No, afterwards. Oh, before, yeah, I'm sorry.

16 Q. And so at some point you got a letter that
17 said -- absolved you of those charges?

18 A. Yes.

19 Q. Did get that letter before July 6 of 2018?

20 A. After.

21 Q. After. So when you walked in and talked to
22 were Escobell on July 26, 2018, you knew the charges had
23 been made, but they had not been yet determined and
24 decided?

25 A. Yes.

1 Q. Then later you found out that other charges
2 were made. You learned about that after July 6 of 2018;
3 is that right?

4 A. Yes.

5 Q. And have you gotten any letter since July 6 of
6 2018 that were either convicting you of these charges or
7 absolving you of these charges?

8 A. I just got that letter that said none of them
9 were sustained.

10 Q. When did you get that letter, using July 6,
11 2018, as a reference point?

12 A. It was around November of last year, I think.

13 Q. Of 2019?

14 A. Yes.

15 Q. Do you have a copy of that letter?

16 A. Yes.

17 Q. We're going to need to get a copy of that
18 letter.

19 A. Then I got called on December of -- in December
20 they called me internal affairs and they said there were
21 more charges.

22 Q. December of what year?

23 A. Of last year.

24 Q. 2019?

25 A. Yes, and said there were more charges. I said

1 how come I never got a copy of it. He just said, I
2 don't know.

3 Q. Who's "he"?

4 A. The guy at internal affairs.

5 Q. Do you know his name?

6 A. Yeah, I can find out.

7 Q. You know, the first time we deposed you on
8 January 31st, 2020, you came in all dressed nice in a
9 suit and you had a whole bunch of documents with you. I
10 remember that. We didn't go into them. I assumed he
11 must have brought those because they have something to
12 do with this case. Did you have copies of some of these
13 letters of charges and all these notice letters?

14 A. Yes.

15 Q. Okay. So you do have copies of these letters?

16 A. Yes.

17 Q. We need you to give those to your attorney so
18 he can --

19 A. He has -- I will give them to him again.

20 Q. We have to go into that. All right. We can't
21 talk about the letters right now. We can't talk about
22 the other charges. We can't talk about the questions
23 and answers that you had related to the internal
24 investigations, but we can talk a little bit about the
25 meeting with Mr. Escobell on July 6, 2018, where you got

1 walked out. Okay? So you told me that he had an
2 officer there to walk you out. You walked in. He asked
3 for all of your stuff, your keys, your cards?

4 A. Uh-huh.

5 Q. All your other work stuff and that he said to
6 you you give me no other choice. Okay? Remember that?

7 A. Uh-huh.

8 Q. Is that a "yes"?

9 A. Yes.

10 Q. So then what else happened in that meeting?

11 A. I asked him can I go back. I still have
12 patient files open on the computer. I need to close
13 those out because I was seeing a patient. And he says,
14 well, okay, but I can walk you off or this gentleman can
15 walk you off. And, but he would have to go with you to
16 close out the files and -- in the clinic. And so he
17 said I want you to get your coat. All of my stuff was
18 still in the office, my coats and everything.

19 Q. Your personal stuff?

20 A. Personal stuff. Go pick up your personal
21 stuff. And the clinic was full, you know, and just
22 finished my patient record that I was working on. And I
23 told the dental assistant just reschedule all the other
24 patients that I have for the rest of the day. And then
25 he immediately --

1 Q. "He" meaning Mr. Escobell?

2 A. No, he had the officer walk me to the clinic

3 and walk me off.

4 Q. Okay.

5 A. And escorted me off.

6 Q. Were any of these people present watching you,

7 like all the people that made charges against you, your

8 hygienist, your assistants, anybody watching?

9 A. They were all there.

10 Q. You walked off in front of these people?

11 A. Yes.

12 Q. Did anybody say anything to you as you were

13 getting walked off?

14 A. I saw Ms. --

15 MR. COHEN: That's a "yes" or "no."

16 THE WITNESS: Okay.

17 BY MR. TAYLOR:

18 Q. So somebody did say something to you?

19 A. No.

20 Q. You saw somebody but they didn't say anything

21 to you?

22 A. No.

23 Q. Is that correct, you saw somebody but they did

24 not say anything to you; is that correct?

25 A. Yes.

1 Q. Why did you bring it up? Did they do
2 something? Did they flip you off? Did they laugh at
3 you? Even if they didn't say anything, why did you say
4 I saw somebody.

5 A. They just smiled.

6 Q. They smiled. Okay. I got it. The smile that
7 you got was kind of like a mean smile, is that what
8 you're saying?

9 A. Uh-huh.

10 Q. Is that a "yes"?

11 A. Yes.

12 Q. Okay. Fair enough. And who was that that gave
13 you the mean smile?

14 A. Joy Martin.

15 Q. Would you consider her one of your enemies, in
16 other words, that she had it in for you? If you were
17 talking to your psychologist or psychiatrist about this
18 would you say that she's one of your enemies at work
19 that had it in for you?

20 A. Yes.

21 Q. Okay. And as far as you know, does she still
22 work there?

23 A. Yes.

24 Q. All right. So then you got walked off; is that
25 right?

1 A. Yes.

2 Q. I take it you were suspended somehow or out of
3 work for a while before you got transferred to Regional
4 4?

5 A. One week.

6 Q. One week. What was your status as of one week
7 as far as you know, your employment status? Were you
8 suspended without pay or were they just giving you time
9 to get transferred?

10 A. Administrative time off, ATO.

11 Q. Did you get paid for that?

12 A. Yes.

13 Q. And as you got walked off, did you know at that
14 moment as you were being walked off that you were going
15 to have a job at Regional 4?

16 A. No.

17 Q. When did you find that out, that you were going
18 to have a job at Region 4?

19 A. On maybe the 6th -- maybe the 12th or 13th.

20 They sent me a certified letter.

21 Q. The 12th or 13th of July of 2018?

22 A. Yes.

23 Q. You got a letter from which office?

24 A. Headquarters, ERO headquarters.

25 Q. And that letter said what?

1 A. You've been reassigned to Regional.

2 Q. Were you happy to get that letter?

3 A. I was at home just being monitored -- I mean,
4 working out of home.

5 Q. I understand. But you were at home -- but when
6 you were at home after you got walked off, did you think
7 you had been fired?

8 A. No.

9 Q. Okay. So as you were being walked off, you
10 knew you still had a job but it just wasn't going to be
11 at Chino; is that right?

12 A. Yes.

13 Q. Okay. Then were you expecting this letter to
14 come to tell you where you had been reassigned to?

15 A. No.

16 Q. How did you know that you still had a job if
17 you weren't expecting this letter of reassignment?

18 A. I didn't do anything wrong.

19 Q. Okay. So when you said that you -- you didn't
20 think that you had been fired it's because you had faith
21 in the system that you hadn't done anything wrong yet?

22 A. Yes.

23 Q. Okay. All right. And do you have a copy of
24 that letter where got the -- from headquarters
25 reassigning you to Region 4?

1 A. Yes.

2 Q. And you gave that to your attorney?

3 A. I don't remember.

4 Q. Well, do you still have a copy?

5 A. Yes.

6 Q. Will you give us a copy?

7 A. Yes.

8 MR. TAYLOR: Let's stop for a minute here.

9 THE REPORTER: Off the record?

10 MR. TAYLOR: Off the record.

11 (Off the record.)

12 MR. TAYLOR: We've had an off-the-discussion
13 record [verbatim] about the fact that there are now
14 still unobtained documents that go right to the heart of
15 the some of the main issues in this case that Mr. SooHoo
16 is -- and Mr. Cohen are going to provide to us to finish
17 this deposition Volume III. They're going to try to get
18 copies of the questions and answers that came on the
19 computer to Mr. SooHoo related to the internal
20 investigations. And they're going to advise us in
21 writing either enclosing those documents or telling us
22 why or we can't get them. We're going to reschedule
23 this deposition for a Volume III and it's our intent to
24 finish it on that date, to talk about these matters that
25 related to the letters and the internal investigations,

1 as well as the body parts that we have not yet covered.

2 We're going to agree then to have Volume II of
3 the deposition transcribed into a draft form like Volume
4 I was, and provided to me by an e-mail attachment just
5 like Volume I was. So that we can use Volumes I and II
6 to make sure that we complete the deposition of Volume
7 III.

8 MR. COHEN: If I recall, you're just getting
9 the volumes. They're not sending originals out until
10 it's all completed?

11 MR. TAYLOR: No.

12 MR. COHEN: Am I right?

13 MR. TAYLOR: Correct.

14 MR. COHEN: So we don't get anything. You'll
15 get your e-mail?

16 MR. TAYLOR: I'll just get my e-mail with
17 Volume II, just like I got Volume I. And we're not
18 finishing the deposition transcripts yet to be in the
19 final form for custody, signing and . . .

20 MR. COHEN: Corrections.

21 MR. TAYLOR: Corrections. But we do want
22 Exhibit A attached to the draft of Volume II. Okay?
23 And then our offices will work to finish -- schedule the
24 finishing of this deposition as soon as possible.

25 Okay, Phil?

1 MR. COHEN: Yeah, that's fine, but let's make
2 sure.

3 Mr. SooHoo, you know what documents he wants
4 you to produce?

5 THE WITNESS: I will bring everything I have.

6 MR. TAYLOR: Okay. So we talked about the
7 letters --

8 MR. COHEN: So he's just going to bring
9 everything he has to the next deposition.

10 MR. TAYLOR: It would be better if you give
11 those ahead of time so that I don't have to see them for
12 the first time at the deposition. That will almost --
13 that will guarantee that it will go on for a very long
14 time. It's much better that I have them ahead of time.

15 MR. COHEN: Let's see, how many pages of
16 documents do you think we're talking about, Mr. SooHoo?
17 Can you even estimate?

18 THE WITNESS: Fifty.

19 MR. COHEN: Fifty.

20 MR. TAYLOR: Okay.

21 MR. COHEN: Quite a bit. So, you know, it
22 might be better just to bring it so we all have it and
23 categorize it at the deposition.

24 MR. TAYLOR: All right. Fair enough, but don't
25 blame me if the deposition ends up going for a long time

1 then. I don't want it to go for a long time.

2 MR. COHEN: Well, we'll just set it on a day
3 where we have plenty of time, maybe a Friday where we
4 start at 10:30 in the morning.

5 MR. TAYLOR: Fair enough.

6 MR. COHEN: A day when we don't have an office
7 lunch so we don't have to take a big break.

8 MR. TAYLOR: All right. Fair enough. So -- so
9 with those agreements and those understandings we will
10 go off the record.

11 THE REPORTER: Counsel, did you want to order a
12 copy?

13 MR. COHEN: He's not going to do a -- there's
14 not going to be any transcript at this time. Just an
15 e-mail to him and then what's going to happen is when
16 everything is all completed then there will be a
17 complete original of everything and then I will be -- by
18 law he will have to provide me a copy and an original.
19 But the original actually will go to him to sign,
20 correct, then back to me. Then I'll let you know. But
21 I'll hold an original. That's what we'll do.

22 THE REPORTER: Off the record?

23 MR. TAYLOR: So just send me a Volume II and we
24 will take care of the custody, signing and final
25 transcripts at Volume III.

1 MR. COHEN: If she did that and that's complete
2 then I guess you might as well have her send me a copy,
3 too, and maybe him a copy, e-mail -- or at least e-mail
4 to him so he has it as well.

5 MR. TAYLOR: We'll have the reporter also
6 e-mail copies of Volume II.

7 MR. COHEN: And I.

8 MR. TAYLOR: Volumes I and II to Mr. SooHoo and
9 to Mr. Cohen.

10 MR. COHEN: She doesn't have to send it to me.
11 Just send it to Mr. SooHoo.

12 MR. TAYLOR: Okay.

13 THE REPORTER: I need an e-mail address.

14 THE WITNESS: G-E-O-R-G-E-M-S-O-O-H-O-O@gmail.c
15 om.

16 (Deposition concluded at 5:14 p.m.)

17

18

19

20

21

22

23

24

25

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand,
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a federal case,
13 before completion of the proceedings, review of the
14 transcript [X] was [] was not requested.

15
16 I further certify I am neither financially
17 interested in the action nor a relative or employee of
18 any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21
22 Dated: March 6, 2020

23
24 _____
25 Debby M. Gladish
RPR, CLR, CCRR, CSR No. 9803
NCRA Realtime Systems Administrator

1 DECLARATION UNDER PENALTY OF PERJURY

2 Case Name: Soohoo vs. State of California

3 Date of Deposition: 02/21/2020

4 Job No.: 10066983

5

6 I, GEORGE SOOHOO, hereby certify

7 under penalty of perjury under the laws of the State of

8 _____ that the foregoing is true and correct.

9 Executed this _____ day of

10 _____, 2020, at _____.

11

12

13

14

GEORGE SOOHOO

15

16 NOTARIZATION (If Required)

17 State of _____

18 County of _____

19 Subscribed and sworn to (or affirmed) before me on

20 this _____ day of _____, 20__,

21 by _____, proved to me on the

22 basis of satisfactory evidence to be the person

23 who appeared before me.

24 Signature: _____ (Seal)

25

1 DEPOSITION ERRATA SHEET

2 Case Name: Soohoo vs. State of California

Name of Witness: George Soohoo

3 Date of Deposition: 02/21/2020

Job No.: 10066983

4 Reason Codes: 1. To clarify the record.

2. To conform to the facts.

5 3. To correct transcription errors.

6 Page _____ Line _____ Reason _____

7 From _____ to _____

8 Page _____ Line _____ Reason _____

9 From _____ to _____

10 Page _____ Line _____ Reason _____

11 From _____ to _____

12 Page _____ Line _____ Reason _____

13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 Page _____ Line _____ Reason _____

23 From _____ to _____

24 Page _____ Line _____ Reason _____

25 From _____ to _____

1 DEPOSITION ERRATA SHEET

2 Page _____ Line _____ Reason _____

3 From _____ to _____

4 Page _____ Line _____ Reason _____

5 From _____ to _____

6 Page _____ Line _____ Reason _____

7 From _____ to _____

8 Page _____ Line _____ Reason _____

9 From _____ to _____

10 Page _____ Line _____ Reason _____

11 From _____ to _____

12 Page _____ Line _____ Reason _____

13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 Page _____ Line _____ Reason _____

23 From _____ to _____

24 Page _____ Line _____ Reason _____

25 From _____ to _____

1 DEPOSITION ERRATA SHEET

2 Page _____ Line _____ Reason _____

3 From _____ to _____

4 Page _____ Line _____ Reason _____

5 From _____ to _____

6 Page _____ Line _____ Reason _____

7 From _____ to _____

8 Page _____ Line _____ Reason _____

9 From _____ to _____

10 Page _____ Line _____ Reason _____

11 From _____ to _____

12 Page _____ Line _____ Reason _____

13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 _____ Subject to the above changes, I certify that the
transcript is true and correct

23 _____ No changes have been made. I certify that the
transcript is true and correct.

24

25

GEORGE SOOHOO

| | | | |
|---|--|--|--|
| 1 | <p>2016 115:4</p> <p>2017 122:1 129:25 130:3 136:23 138:11,12 141:23</p> <p>2018 75:24 79:10 100:7,8,14 102:10, 24 133:7 135:4,6,7, 13,16 136:25 138:1 141:23 149:3 154:6, 10 156:8 157:21 159:23 160:1,5 162:6,7 165:25 168:4,9,18 169:4,14, 19,22 170:2,6,11 171:25 175:21</p> <p>2019 100:6 135:7,8, 12 160:19 170:13,24</p> <p>2020 66:1 100:6 171:8</p> <p>21 66:1</p> <p>21st 122:1 130:3 136:23 138:11</p> <p>25 110:22</p> <p>25th 103:23</p> <p>26 169:22</p> <p>2:30 66:2</p> | <p>175:4,15,18 176:25</p> <p>40 150:16,18</p> | <p>absent 99:17 140:9</p> <p>absolved 169:17</p> <p>absolving 170:7</p> <p>abusing 106:13</p> <p>abusive 106:14 163:1</p> <p>accommodate 84:23</p> <p>accommodation 76:9</p> <p>accommodations 76:19,23</p> <p>accurately 69:25</p> <p>accusation 167:15</p> <p>accusing 106:12</p> <p>act 126:11 141:2</p> <p>acted 108:23</p> <p>acting 140:18,20,21 142:4,5,7,10,16,18, 24</p> <p>action 131:7 133:24 151:15 152:4,15 161:5 167:15</p> <p>actions 109:5</p> <p>activity 86:22</p> <p>actual 70:18 71:1</p> <p>add 67:5 153:21</p> <p>added 138:3 140:9</p> <p>addendum 102:12</p> <p>additional 160:20</p> <p>address 72:25 181:13</p> <p>Addressed 109:14</p> <p>adds 153:22</p> <p>adequate 84:22</p> <p>administrating 73:20</p> <p>Administration 143:9</p> <p>administrative 71:10,</p> |
| 2 | <p>2 114:22 121:25 129:24 131:7 132:13</p> <p>2008 85:4,11</p> <p>2009 85:4,11</p> <p>2010 75:12 82:10 86:1,9 91:12 94:20 97:10 98:3,19 100:5, 6,8,14 101:20</p> <p>2015 104:4</p> | <p>5</p> <p>5 146:19 157:17,20</p> <p>50 143:12</p> <p>5:14 66:2 181:16</p> | <p>5</p> <p>6</p> <p>6 100:9,10,11,14 103:8 133:7 154:10 157:13,18,21 159:23 160:5 161:17,18 168:4,9,18 169:4,14, 19 170:2,5,10 171:25</p> <p>6th 135:4 136:25 175:19</p> |
| 3 | <p>30th 104:4</p> <p>31st 66:11 67:3 70:3 85:21 171:8</p> | <p>6</p> <p>7</p> <p>7 102:10,23</p> <p>70 140:23</p> <p>7th 137:25</p> | <p>act 126:11 141:2</p> <p>acted 108:23</p> <p>acting 140:18,20,21 142:4,5,7,10,16,18, 24</p> <p>action 131:7 133:24 151:15 152:4,15 161:5 167:15</p> <p>actions 109:5</p> <p>activity 86:22</p> <p>actual 70:18 71:1</p> <p>add 67:5 153:21</p> <p>added 138:3 140:9</p> <p>addendum 102:12</p> <p>additional 160:20</p> <p>address 72:25 181:13</p> <p>Addressed 109:14</p> <p>adds 153:22</p> <p>adequate 84:22</p> <p>administrating 73:20</p> <p>Administration 143:9</p> <p>administrative 71:10,</p> |
| 4 | <p>4 70:7,8,14 75:20 79:7 81:15 82:4,8, 15,22 83:2,4,17 84:13 85:7 95:9,21 96:5 110:4 136:8</p> | <p>7</p> <p>7 102:10,23</p> <p>70 140:23</p> <p>7th 137:25</p> | <p>7</p> <p>7 102:10,23</p> <p>70 140:23</p> <p>7th 137:25</p> |
| 5 | <p>5</p> | <p>5</p> | <p>5</p> |
| 6 | <p>6</p> | <p>6</p> | <p>6</p> |
| 7 | <p>7</p> | <p>7</p> | <p>7</p> |
| 8 | <p>8</p> | <p>8</p> | <p>8</p> |
| 9 | <p>9</p> | <p>9</p> | <p>9</p> |
| A | <p>A</p> | <p>A</p> | <p>A</p> |
| B | <p>B</p> | <p>B</p> | <p>B</p> |
| C | <p>C</p> | <p>C</p> | <p>C</p> |
| D | <p>D</p> | <p>D</p> | <p>D</p> |
| E | <p>E</p> | <p>E</p> | <p>E</p> |
| F | <p>F</p> | <p>F</p> | <p>F</p> |
| G | <p>G</p> | <p>G</p> | <p>G</p> |
| H | <p>H</p> | <p>H</p> | <p>H</p> |
| I | <p>I</p> | <p>I</p> | <p>I</p> |
| J | <p>J</p> | <p>J</p> | <p>J</p> |
| K | <p>K</p> | <p>K</p> | <p>K</p> |
| L | <p>L</p> | <p>L</p> | <p>L</p> |
| M | <p>M</p> | <p>M</p> | <p>M</p> |
| N | <p>N</p> | <p>N</p> | <p>N</p> |
| O | <p>O</p> | <p>O</p> | <p>O</p> |
| P | <p>P</p> | <p>P</p> | <p>P</p> |
| Q | <p>Q</p> | <p>Q</p> | <p>Q</p> |
| R | <p>R</p> | <p>R</p> | <p>R</p> |
| S | <p>S</p> | <p>S</p> | <p>S</p> |
| T | <p>T</p> | <p>T</p> | <p>T</p> |
| U | <p>U</p> | <p>U</p> | <p>U</p> |
| V | <p>V</p> | <p>V</p> | <p>V</p> |
| W | <p>W</p> | <p>W</p> | <p>W</p> |
| X | <p>X</p> | <p>X</p> | <p>X</p> |
| Y | <p>Y</p> | <p>Y</p> | <p>Y</p> |
| Z | <p>Z</p> | <p>Z</p> | <p>Z</p> |

| | | | |
|---|--|---|--|
| 24 72:2,7 73:11,12 80:4 82:19,23 83:7, 10 109:5 175:10 | 118:10 148:9 158:10,19 164:24 179:11,14 | anymore 150:22 | arrived 117:25 |
| administrator 110:4, 13 159:5 | alarming 129:6 | anytime 79:16,24 158:3 | asked 67:3,7 103:14 111:17,18,19 117:12 122:25 139:19 158:21,23 172:2,11 |
| administrators 143:12 165:3 | alcohol 124:14 125:6 126:12 | anyway 116:5 119:16 123:9 | asking 118:12 121:11 |
| admonitions 75:8 | Alexander 68:18 | Apparently 87:8 | assault 130:6,10 132:15 |
| advance 122:9 | allegation 159:12 | appears 102:11 | assigned 81:25 82:4 |
| adverse 161:5 | allegations 161:20 162:4,8,25 | applicant 117:16 | assignment 82:3 |
| advice 119:14,21 | allow 76:20 165:1 | applicants 115:20 119:3 | assist 146:2,4 167:13 |
| advise 177:20 | allowed 96:17 112:1 133:19,22 141:9 | applied 115:20 | assistant 87:4 114:12 115:17 138:13 139:23 140:1,14,21, 22 145:11,25 158:11 165:17 167:10 172:23 |
| advised 78:18 118:25 119:9 | ambiguous 74:8 | applies 121:15 | assistants 73:14 77:14 138:15 139:2 140:4,23 141:14 145:3 173:8 |
| affair 157:2 | Amlodipine 68:9 | apply 119:4 | Associate 147:7 |
| affairs 114:6 134:5,8, 11,19,21,22 135:3,5 136:19 152:9,19 155:16,18,22 156:4 158:18 167:22,23 170:20 171:4 | amount 75:14 138:14,17 | appointed 84:7 | assume 66:13 161:17 |
| affairs' 155:4 | anesthetize 163:13 | appropriate 119:11 | assumed 139:10 150:10 171:10 |
| affect 80:24 | angry 108:24 | approval 148:17 | assuming 87:14 120:25 123:4 |
| afraid 130:6,10,12 153:14 | announced 148:18 | approve 94:12,16 | assumption 139:15 |
| agencies 161:4 | answer 156:11 162:10 | approved 141:9 159:4 | athlete 125:1 |
| aggressive 124:24,25 131:24 | answered 162:20 | approximate 85:10 98:18 133:7 | athletic 124:23,24 |
| ago 122:9 135:13,14 | answering 69:24 | approximately 69:20 75:4 82:10 86:1 94:21 103:25 115:4 | ATO 175:10 |
| agree 82:3 127:22 145:1 153:14 155:2 178:2 | answers 117:15 156:13,22 157:1 171:23 177:18 | approximation 75:9 82:11 | attach 103:10 |
| agreement 100:1 | antianxiety 69:12,13, 14 | April 103:23 110:22 113:15 122:1 130:3 136:23 138:11 | attached 178:22 |
| agreements 180:9 | antidepressant 69:16 | area 154:15 | attachment 178:4 |
| ahead 68:6 102:7 106:2 107:18 115:6, 13 116:22 117:7 | antidepressants 69:12 | argument 132:5 | attack 68:15 |
| | anybody 104:22 117:17 125:23 131:25 136:12 165:9 166:22 167:8 173:8, 12 | arguments 126:12 | attention 142:23 164:9 168:17 |
| | | arm 123:20 | |
| | | arms 72:5 | |
| | | arrest 133:11 | |

| | | | |
|---|--|--|--|
| attorney 102:16,20 111:6 132:22 157:6 160:13 171:17 177:2 | 166:2 167:11 172:11 180:20 | best 66:16 119:7 143:1 161:13 | Brisas 122:2 |
| attorney's 66:9,12 | backhanded 124:2 125:5,17,20,24 | better 104:23 119:12 179:10,14,22 | broad 92:20 |
| audit 84:19 | backhanding 123:21 126:11 | big 71:17 84:20 107:12 124:24 132:5 141:12 167:15 180:7 | brought 78:11 97:4 100:10 108:18 148:1,4 168:10 171:11 |
| auditing 84:14 85:8 | backwards 74:21 | bigger 124:21,22 | bruises 128:19 |
| audits 77:14 83:19 | bad 84:4 106:12 123:5 152:16 | bill 127:11 | Buena 90:12,15,18 91:13,19,22 93:16 154:12 |
| August 98:20 | Ballou 112:19 113:1, 2,4,13 | Bishop 147:5,16,18, 25 148:6,15,16 149:12 152:7 | building 73:1,5 |
| authority 108:16 109:5 120:13 134:13,15,16 135:18,20 148:18 152:11 | bar 145:25 | bit 95:22 171:24 179:21 | bunch 171:9 |
| authorized 135:20 | basically 84:24 89:17 93:14 97:4,7 98:2 107:24 111:8,10,15 117:21 118:6 122:23 134:21 135:22 151:3 153:11 155:12 163:3 165:2 166:17 | bizarre 125:2 126:11 | bureaucracy 71:1 |
| auxiliary 73:11,12 | basis 77:23 | blame 179:25 | bureaucratic 97:24 |
| average 87:11,24,25 | bat 108:7,21 | blank 146:3 148:24 149:13 151:3 | <hr/> C <hr/> |
| avoided 131:19 | batch 165:22 | bleeding 131:14 | C-L-O-P-I-D-O-G-R-E-L 68:14 |
| AW 147:5,6 | bathroom 128:5 | blew 108:15,24 120:9 | California 66:1 74:3, 7,15 75:1 84:3 91:22 94:7,23 98:3 100:2 102:14 110:1 |
| aware 98:23 161:19 | Beach 69:9 | blood 68:9,10 98:22 99:1 100:20 128:15 | call 75:20 96:7 113:5 124:17 131:8 145:4 157:24 158:1,6 |
| <hr/> B <hr/> | bed 89:2 | blowups 125:8,13 | called 117:24 118:1 149:7,14 170:19,20 |
| B-A-L-L-O-U 113:2 | beginning 66:14 153:6 | Blythe 74:18 | calling 66:11 152:5 |
| B-E-L-L 101:8,9 | behavior 106:12 131:25 | body 71:19 72:5 178:1 | calls 129:13 |
| B-E-R-D-Y 68:22 | believe 79:1 89:9 100:19 114:8 148:6 | boss 104:23 108:16 137:22 162:21 | canceled 117:9 164:23 |
| babies 141:5 | Belinda 116:25 | bottom 103:6 112:25 113:1 129:25 | candidate 119:12 |
| back 70:22 81:20 82:4 86:8,10 88:23 89:4,5,7,10,11,23 90:7,8,9,10,16,22 91:1,14 92:1 108:19 112:15,16 113:10 120:2 123:20 132:23 145:13 151:17 152:10,12,20 156:8 157:19 158:12 160:16,17 161:1 163:7 164:11,12 | belong 143:6 | break 86:24 87:14 164:4,5 180:7 | candidates 115:16 119:8 |
| | bend 89:14 | breaths 127:8 | cardiovascular 98:23 99:1 100:20 |
| | bent 87:5 | bring 69:3 84:15 86:21 122:25 142:23 148:3 174:1 179:5,8, 22 | |
| | Berdy 68:18 | | |

| | | | |
|---|---|---|--|
| cards 172:3 | 169:11,17,22 170:1, 6,7,21,25 171:13,22 173:7 | 2,4,13 | code 71:1 |
| care 84:22 85:1 123:6 141:6 180:24 | charging 155:19,20 161:21 | circumstances 75:15 138:2 139:19 | Cohen 67:20 71:14 74:8 79:10 83:1 93:2 102:23 113:23 124:8,14 127:24 130:25 133:18 135:7 139:24 154:17 162:10 164:4 173:15 177:16 178:8,12,14, 20 179:1,8,15,19,21 180:2,6,13 181:1,7, 9,10 |
| carpal 76:9,12,20 | cheek 127:14,20,22, 25 128:12 | city 90:14 133:2,8 | colleagues 126:3,8 |
| case 155:2 156:24 171:12 177:15 | cheek's 127:16 | civil 133:17,25 155:6 | collect 137:12 |
| casual 129:12 | chef 122:20 | civilian 105:12 | collectively 103:4 |
| categorize 179:23 | chewed 130:22 132:4 | claim 91:8 98:22 102:12 | collusion 166:3 |
| caused 99:2,20 100:19 | chief 85:15,22 86:6 93:9,11,15 95:2 96:8,10,12,16,23 97:3,5 98:6,10 132:5 | claimed 164:22 167:5,11 | come 72:20 82:14 92:14 99:18 119:25 131:11 133:10 149:10 150:19 155:15 157:25 160:20 163:7 164:11,12 165:1 166:2 167:15,24 168:21 171:1 176:14 |
| causes 69:23 | child 87:25 | claims 74:2 75:15 86:6 98:14,21 107:4 114:21 137:13 | comes 103:7 108:4 113:6 152:10,12 |
| causing 79:2 80:23 | Chino 74:4,7,15 75:1, 16 78:7,18 79:1 81:9,11,14 82:16 91:23 92:25 94:7,23 96:5,16,18,24 97:3, 10 98:3,7,19 99:23 100:2,15 101:11,16, 18,20 104:5 105:25 107:6 110:2 114:21 121:13 122:2 133:3, 6,8 134:20 135:25 139:8 154:12 176:11 | clarify 139:3 | coming 118:2,3 140:17,25 165:21 |
| CDCR 70:14 155:20 | chiropractor 89:24 | clashes 143:21 | comment 94:3 |
| CDCR's 134:21 | choice 82:1 123:3 159:2,9,24 160:7 172:6 | clean 114:4 | comments 115:15 |
| Center 93:4 | Chung 69:6 | cleaned 114:16 | commit 79:20 |
| CEO 101:10,11,13,14, 17 104:3 105:4 109:16,20,25 111:23 115:8,11 117:9,24 122:25 130:13,14 135:25 152:11,12 | CIM 106:5 109:16,21 116:11,12 118:24 122:20 138:24 140:23 162:20 | cleaning 163:13,14, 22,24 | common 87:1 152:23 |
| certified 175:20 | Cindy 112:19 113:1, | clear 116:20 | communicated 78:25 |
| cetera 72:6 | | clinic 82:24 172:16, 21 173:2 | comp 71:17 74:2 75:15 86:4 88:7 91:3,8,17 95:25 98:14 99:7 140:6 141:14 144:17 145:12 154:1 156:21 |
| chair 76:21 87:2 | | clinical 71:11 72:4, 16,17 73:17 80:1,3, 4,8 82:18,20,21,25 83:8,12,13 92:2 95:11 143:12 | |
| change 66:17 67:4 | | clodigogrel 68:13 | |
| changed 67:6 96:17 | | close 172:12,16 | |
| channels 119:22 | | closed 94:17,19 95:10 96:23 | |
| charged 162:4 | | closing 94:17 | |
| charges 130:6,10 133:11 134:2 155:13,14,15,24,25 159:19 160:14,20 161:8,9,15,19,24 164:17,20 165:6,9, 19,21,24 166:8,23 167:14,19,21 168:10,14,17,20 | | clothes 128:9 | |
| | | CME 122:21 | |
| | | coat 172:17 | |
| | | coats 172:18 | |

| | | | |
|---|--|--|--|
| complaining 163:5 | convicting 170:6 | coworkers 80:13 92:19 106:13 161:16,24 | 125:12 129:14,15,21 130:4 132:13 133:6 143:24 144:23 162:22 172:24 180:2,6 |
| complaints 91:3,17 152:4 | cooperative 119:1 | crazy 67:14 | deadlines 106:9,17 |
| complete 102:17 103:11 178:6 180:17 181:1 | coordinator 147:8 152:8 | cubicles 73:10 | deal 107:12 131:4 |
| completed 178:10 180:16 | copies 114:5,6 156:9, 13,25 171:12,15 177:18 181:6 | Cucamonga 70:7,16 72:9 73:2 75:21 79:8 81:3,7,18 152:19 154:13 | dealing 80:12 137:8 |
| compliance 84:15 | copy 102:5,10,15,17, 24 103:3,13 111:2,6 112:11 120:18 121:9 133:5 159:12 160:12 170:15,17 171:1 176:23 177:4,6 180:12,18 181:2,3 | culture 99:3,4 100:23 | dealt 104:11 |
| computer 72:19 76:11 77:5,17 156:6 172:12 177:19 | cordial 115:18,21 119:1 | currently 70:6 | Debby 67:14 97:21 |
| computers 72:3 | correct 74:4,17 75:17 83:14 88:21 95:16, 17 97:15,25 98:7,16 103:16 105:18 110:8 112:5 121:2 136:25 137:4,21 159:14,16 160:5,6 173:23,24 178:13 180:20 | custody 178:19 180:24 | Debra 118:22 |
| concluded 181:16 | correction 114:8 | cut 128:12 | December 135:6,12, 13,16 156:8 160:1, 17,18,19 170:19,22 |
| conditions 84:4 107:5 153:23 | corrections 70:9 85:14 91:4,15,24 93:21,24 157:8 178:20,21 | cuts 128:19 | decide 132:17 133:25 157:9 |
| confidential 102:9,12 136:9 148:10 157:9 | COS 165:1 | <hr/> D <hr/> | decided 132:21 169:24 |
| confronted 168:9 | Counsel 180:11 | D-A-O 93:6 | decision 134:17 155:3 |
| congregated 166:1 | county 133:2 | D-O 93:7 | decisions 155:1 |
| consider 174:15 | couple 79:17 82:12 108:5,10 167:25 | damage 98:22,25 | deep 127:8 163:13 |
| considered 159:20 | court 84:7 | damages 133:16 | defendants' 103:1 |
| consulted 78:17 | cover 135:22 142:16, 24 | dangerous 131:25 | deficient 107:25 |
| consulting 77:10 | covered 178:1 | date 110:21,23 122:1 133:7 135:4 177:24 | demands 106:9 |
| contact 143:3 | | dated 102:10 | demonstrating 123:24 |
| contain 121:11 | | dates 154:4,6 161:13, 14 169:9 | demoted 94:18 |
| contained 73:8,23 120:16 121:20 | | Dave's 165:14 | demotion 95:10 |
| continue 66:10 | | Davis 162:14,25 164:9,21 165:7,18 166:6,22 | dental 73:13 77:13 84:10 87:4 98:5 99:14 115:17,21 119:13 138:13,15 139:2,23 140:1,3,13, 21,22,23 141:14 144:10 145:3,11,25 149:11 158:11 162:17,18,19 163:20 |
| continuity 84:25 | | dawned 153:10 | |
| control 84:20 | | day 77:2,4,8 87:8,11 88:17 105:19 115:15 116:1,3 118:7 119:24 122:8,24 | |
| conversation 123:12 129:1 132:11 164:16 | | | |
| conversations 129:4, 12 | | | |

| | | | |
|---|--|--|---|
| 165:16,17 167:2,3, 10 172:23 | desk 77:5 | dispense 66:21 | 129:18 130:3,5,7,20 131:10 132:12 148:20 |
| dentist 70:24 71:4,7, 11,23 72:1,4 82:17, 18,19,20,25 83:8,13 85:15,22 86:7 87:1 92:2 93:8,15 94:18 95:1,2,11 96:8,10, 11,12,16,23 97:1,3, 5,6,9 98:4,6,11,12 105:12,14 111:22 112:1 116:10,17 118:18 122:11 138:16,24 143:11 | desks 77:16 | divided 139:14 163:20 | draft 178:3,22 |
| dentistry 73:18 80:1, 3 83:13 84:6 101:14 | detail 97:8 104:11 | division 70:11,13 84:10 91:25 | dressed 128:8 171:8 |
| dentists 77:9,10,13 138:18,22 139:1,9, 12,13,20 146:4 149:7 162:23 167:13 | determine 152:13 | DJJS 94:17 | drilling 163:22 |
| department 70:9,11, 13 85:14,15,22 86:3, 7 88:24 90:13,25 91:4,5,12,15,16,18, 21,24,25 92:2,14,17, 24 93:16,20,24 94:1, 6,19 95:8 99:14 101:14 122:13 157:8,10 | determined 169:23 | doctor 68:19 69:7 90:9 93:9 105:11 145:24 146:2 | drink 124:15 |
| department's 98:5 | development 104:3, 17 105:3 107:19,21 108:4,8 110:6 111:12 112:2 | doctors 88:11 90:5 141:9 156:23 | drinking 124:4 |
| depending 155:13 | diabetes 67:10 68:7 | document 151:18 | drive 67:14 |
| depends 87:16 | Diego 66:1 154:16 | documentation 111:14 | drunk 130:21 |
| deposed 171:7 | difference 71:17 | documented 151:17 153:11 | duties 80:12 99:2 141:17 |
| deposition 66:10,15 70:3 85:21 177:17, 23 178:3,6,18,24 179:9,12,23,25 181:16 | differences 105:20, 22 106:7,8 | documents 121:11 171:9 177:14,21 179:3,16 | duty 76:1 |
| describe 77:7 | different 139:25 163:23 167:16 168:14,15 | doing 71:11,18 77:4 79:22 80:4 83:9,13 85:8,20 89:10 106:13 109:6 115:1 116:6 118:7,12 120:6,13 123:22,23 143:16 145:8 163:4, 22 164:10,13 165:5 | <hr/> E <hr/> |
| description 80:12 84:18 | difficult 167:1 | Don 116:7,10 117:13 118:9,14,17,18 | e-mail 113:5 178:4, 15,16 180:15 181:3, 6,13 |
| | direct 105:7 162:18 | downgraded 97:5 | e-mails 129:13 |
| | directly 113:23 157:7 162:21 | Dr 68:18 72:12,15 73:9 78:3,14 79:5 93:1,6 94:5 105:9, 14,18,23 106:25 107:6 111:19,20,21 112:2 113:10 115:7 116:7,10 118:18 120:17,20 121:5 122:5,16 123:13 126:1,7,14,15 127:2 | E-S-C-O-B-E-L 101:7 |
| | director 72:16,17 | | early 115:4 |
| | disagreements 106:3,16,25 125:9 | | easier 81:23 |
| | discipline 95:15 97:13 98:16 106:22 | | ECR 108:1 |
| | discover 90:6 | | EEO 147:5,8,10,11 148:10,19 151:5 152:7 |
| | discuss 85:18 111:11 138:6 | | EEOC 136:16 |
| | discussed 66:14 129:11,13,20 | | effects 80:24 81:4 |
| | discussing 91:2 145:2 | | egotistical 132:9 |
| | discussion 77:10 119:19 | | eight 73:24 87:12 |
| | Discussions 77:13 | | Eighteen 135:15 |
| | | | either 89:5 129:11,21 137:19,22 170:6 177:21 |
| | | | elevated 68:12 |

| | | | |
|---|---|--|--|
| eliminated 98:6,11 | 8 155:22,25 156:5, 18 158:2,24,25 161:15 168:8 169:22 171:25 173:1 | exhibited 131:24 | Family 141:2 |
| else's 162:19 | | exonerated 160:13, 16 | far 77:23 79:21 105:10 114:20 115:21 124:6 125:6 131:20 134:7 135:16,24 136:10 137:7,13,16 143:20 152:4 155:12,18 174:21 175:7 |
| employed 116:19 | Escobell's 113:21 117:20,25 118:11 120:5 132:15 137:15 149:19 | expecting 176:13,17 | Farooq 122:5,6,8,16, 18 123:13 126:1,7, 15 127:2 128:23 129:18 130:4,6,7,15, 20 131:10 132:12 |
| employee 112:24 | escorted 173:5 | experience 119:13 143:25 144:2 | Farooqs 129:11,21 |
| employment 102:13 153:25 154:2,7,11 155:6 175:7 | Especially 138:12 | explain 67:4 148:9 | fashion 85:19 |
| enclosing 177:21 | essentially 97:25 | explained 111:10 151:1 | fear 153:17,19 |
| ended 136:24 | establish 166:11 | explanation 113:16 | February 66:1 129:25 |
| ends 179:25 | estimate 75:9,11 82:11 179:17 | expression 130:11 | feel 111:15 123:2,5 150:23 151:12 |
| enemies 174:15,18 | estimated 85:21 | extending 117:14 | feeling 148:16 166:3 |
| enjoy 80:1 | et 72:6 | extra 141:13 | felt 138:6 152:14 |
| ensure 84:25 | evaluated 111:20,22 | extreme 131:5 | Fenofibrate 68:12 |
| entire 91:23 | everybody 105:21 133:23 161:16 | extremely 122:1 | Fifty 179:18,19 |
| environment 99:2 137:14 | everybody's 123:10 | eyes 130:12 | figure 125:3 126:10 |
| environmental 80:21 | evidence 120:22 | <hr/> F <hr/> | file 130:6,10 132:18, 21,24,25 133:4 135:5 146:5 153:21 155:7 165:19 |
| ERO 108:19 112:17, 18,23 175:24 | ex-CEO 110:1 | F-E-N-O-F-I-B-R-A-T- E 68:12 | filed 135:2 148:11 149:1 155:21 156:8 159:25 160:20 161:14 |
| Escobel 101:4 | exact 97:24 102:17 110:23 129:8 | face 123:16,18 127:15,16,19 128:19 136:22 137:3 138:11 | files 84:14 172:12,16 |
| Escobell 101:19,22 103:15 104:3 105:3, 10 107:9,11 108:22 109:22 110:2,5 111:12,21,24 112:9 114:19 115:9,12 118:15 119:15,21 120:16 121:1,6,12, 19 122:6 123:13 124:18 125:8,19,24 126:2,6,14,17,20,24 128:17,22 130:19,21 131:17,20 132:8 133:16 134:6,15 135:24 137:9,20 138:2 139:5 144:6 145:6 146:12 147:2, 19,20 148:16,18 149:10,12,14 150:3, | exactly 75:7 130:24 152:18 | face-to-face 109:2 | filing 133:25 152:5 154:20 |
| | EXAMINATION 66:7 | facial 130:11 | fill 74:20 148:24 149:13 151:4 |
| | exchanged 133:20 154:24 | fact 95:9 100:21 177:13 | |
| | executive 122:20 | fair 75:13 79:2 85:3, 10 93:19,23 107:3,7, 14 110:16 119:7,11, 23 132:14,16 145:18 148:2 174:12 179:24 180:5,8 | |
| | Exhibit 103:1,5,13,20 105:2 107:17 109:10 112:20 114:23 120:19,24 121:10, 20,25 129:24 132:13 137:6,25 138:8 152:1 154:5 157:17, 18 161:13 178:22 | faith 176:20 | |
| | | familiar 81:24 | |

| | | | |
|--|--|--|---|
| filled 133:8 136:19 137:6,25 152:9 | 8,15 144:17 145:3 | generally 77:4 133:22 | goes 76:22 115:15 157:17 159:12 |
| final 178:19 180:24 | following 116:1 | gentleman 172:14 | going 66:13,21 73:17, 18 74:20 77:25 |
| finally 132:22 | follows 66:5 | GEORGE 66:4 | 79:16 80:23 90:10, 24 102:15 103:5,15 |
| find 71:25 74:13 93:25 116:11,13 118:7 133:19,22 153:4 154:24 169:10 171:6 175:17 | forced 114:8 | get along 143:19 144:11 | 104:23 107:12 116:3,12,15,18 117:13 118:9 119:22 121:25 122:1,8 130:10 133:23 |
| fine 82:5 100:13 104:14 117:15 119:14 179:1 | forehead 127:18,25 | getting 80:18 89:21 115:21 120:21 143:20 161:11 166:10 173:13 178:8 | 134:8,17 135:19 140:25 143:4 146:5 149:11,25 150:7 152:13 153:4 155:10 156:19,24 158:12 160:8,9 161:12 170:17 175:14,17 176:10 177:16,17, 20,22 178:2 179:8, 25 180:13,14,15 |
| finger 128:17 | forever 129:7 | give 66:16 69:2 75:10 77:1 84:18 85:25 96:19 106:21 107:19,22 108:1 110:21 133:7 159:2, 8,24 160:7 162:4 171:17,19 172:6 177:6 179:10 | 170:17 175:14,17 176:10 177:16,17, 20,22 178:2 179:8, 25 180:13,14,15 |
| finish 66:20 70:13 119:19 163:18 177:16,24 178:23 | forgot 79:8 | given 104:2 108:10 160:21 167:18 | good 76:11 86:2 107:1 137:19 |
| finished 156:17 172:22 | form 178:3,19 | gives 108:5,8 | gossip 104:22 132:1, 4,6 |
| finishing 178:18,24 | formal 88:18 89:22 | giving 75:9 80:23 111:6,13 121:6 175:8 | gossiped 120:3 |
| fire 106:19 153:15 | formulated 151:21 | go 68:6 77:6 83:12 88:17 91:7 92:8 94:2 95:5 96:20 99:22 100:11 102:7 106:2 107:18 109:5 114:22 115:6,13 116:13,22 117:7 118:10 128:5 131:9,11 136:3 142:2 143:10 144:17 145:13 146:4,5,10 147:12 148:9 149:14,22,24 152:9, 18 153:12,13,23,25 154:2,7 155:6 158:10,12,19 160:23 164:24 171:10,20 172:11,15,20 177:14 179:13 180:1,10,19 | gotten 137:17 139:9 147:18 170:5 |
| fired 126:17 153:7 176:7,20 | found 118:6 150:17 164:8 169:10 170:1 | | grade 71:3 |
| first 66:11,14 83:4 85:7 91:2,10 92:5 101:19,20 103:15, 21,22 104:7,19 105:1 112:25 115:15 118:11 126:21 134:3 150:17 161:9,18 166:11 171:7 179:12 | four 71:8 82:13,15,22 83:5,14,17 85:2,6,11 95:4,21,23 96:1,6 130:18 163:8,17 | | great 145:8 |
| fit 144:1 | four- 102:8 | | grievance 152:5 |
| five 103:7 130:18 133:9 | fourth 73:1 84:23 | | group 151:2 168:17 |
| five- 102:8 | Friday 66:1 180:3 | | guarantee 179:13 |
| fix 110:17 142:18 | friend 122:19 | | guess 75:10 84:10 98:22 117:21 181:2 |
| flip 174:2 | friends 126:1,7 | | guidelines 83:23 |
| flow 87:9,10 | front 67:15 102:5,18 123:14 127:17 144:14 146:3 149:21 173:10 | | guy 104:23 124:23,24 132:20 171:4 |
| FMLA 140:24 141:1, | full 70:3 76:1 102:17 172:21 | | |
| | fully 111:12 | | |
| | <hr/> G <hr/> | | |
| | G-E-O-R-G-E-M-S-O- O-H-O-O@GMAIL.C 181:14 | | |
| | gather 120:22 | | |
| | general 129:3 | | |

| H | | | |
|---|--|---|---|
| | hate 153:3,5 | highly 130:1 146:20 | hygienist 138:16 149:7 162:17,18,19 163:24 165:16 167:2,3 173:8 |
| | HCTZ 68:9 | hire 155:10 | hygienists 139:2 |
| H-E-R-R-I-C-K 109:15 | head 147:5 165:15 | hired 110:9 118:19 119:16 143:17 | |
| H-U-N-G 93:6 | headquarters 81:25 96:13,14 144:1 175:24 176:24 | hiring 108:16 120:12 134:12,15,16 135:18,20 148:18 152:11 | I |
| half 79:13 103:7 111:23 140:24 | health 88:17 143:15 | history 74:1,6 75:14 79:1 91:8,23 114:15 152:24 | ID 158:22 |
| hallways 77:7 | healthcare 70:12,15 73:14 75:20 84:4,25 88:11 90:6 101:12, 13,14 105:11 122:14 | hit 123:16 126:22,23 127:14,18,24 128:11,23 129:2 134:15 | idea 137:18 150:7,14 167:17 |
| hand 76:15,17 86:8 92:4,6,13 103:6 113:18 114:11 123:20 124:2 157:20 | hear 112:15,16 113:4 158:4 | hold 109:17 110:13 146:17 161:10 180:21 | identified 103:4 |
| handed 104:16 105:2 114:12 | heard 109:19 112:18 113:10 119:5 126:21 132:1,4,6 135:17 145:6,7 | home 80:19 133:5 176:3,4,5,6 | identify 103:10 |
| handing 105:4 | hearing 157:19 | honesty 104:21 | IDP 108:3 111:13 113:8,15 114:5,6 121:7,15 |
| handled 168:13,14 | hearings 156:3 | hosts 73:14 | IDPS 111:16 |
| hands 71:19 72:5 76:13 | heart 68:15 177:14 | hour 150:16,18 | II 66:11 178:2,5,17,22 180:23 181:6,8 |
| handwriting 67:15 72:3 | heavily 156:20 | housing 165:1 | III 132:5 177:17,23 178:7 180:25 |
| happen 125:4 128:13 180:15 | hell 125:4 | HPM3 97:4 | imagination 152:22 |
| happened 78:18 81:6,9 85:4 97:1 112:14,15 113:13 120:8 122:7 123:11 126:20 136:22,23 137:4,14 138:10,12 142:21 147:4 149:2 150:18 151:1,7 165:3 166:11 169:7 172:10 | help 102:3 151:13 | HPMIII 115:1 118:13, 16,19,23 143:7,13, 14 | imagine 129:6 152:24 |
| happening 141:23 152:21,25 | helped 138:22 | HR 116:20 117:5 120:6 | immediately 158:11 172:25 |
| happens 156:20 | helpful 115:18 | huddle 149:6 | impact 111:13 |
| happy 176:2 | Herrick 109:14,20 110:2,10,14,17 111:9,10,18,19 112:10,15 113:10,11 120:17 121:5,9,14, 21 130:14 159:4 | huddles 149:7,22 | important 138:7 156:18,22 168:12 |
| harassment 106:13 | hey 116:6 148:23 | human 116:5 143:4, 10 152:5 | imprinted 129:7 |
| hard 123:16 126:23 128:24 | hidden 131:12 | hundred 72:7 | improper 106:14 |
| | high 127:7 | Hung 93:1,6 | improperly 166:19 |
| | higher 108:18 | husband 122:17 | improvement 108:10 114:1 |
| | highest 96:21 | | improvements 108:3 |
| | | | inappropriate 163:1 |
| | | | inappropriately 108:24 |

| | | | |
|--|--|---|--|
| incident 110:6 122:7 125:13 131:6,21 132:2 134:14 136:9, 22,23 137:3 138:11 147:1 148:9 157:14, 22 | intent 161:4 177:23 | 92:4,6,13 116:14 148:19 151:5 157:20 177:15 | 7 87:21 88:25 90:14, 25 91:5,13,16,19,22 92:3,15,18,24 93:16 94:2,6,19 95:9,10 |
| incidents 121:19 138:1,5,10 | intention 154:19 | | justifies 111:15 |
| included 84:6,9 | interacting 77:24 | J | juvenile 85:15,22 86:3,7 87:21 88:25 90:14,25 91:5,13,16, 19,22 92:3,15,18,24 93:16 94:2,6,19 95:9,10 |
| including 123:10 | interim 116:17 130:14 | J-E-F-F 72:14 | |
| incorrect 139:16,17 | internal 114:6 134:5, 8,11,19,21,22 135:2, 5 136:19 152:9,18 155:4,15,18,21 156:4,19 157:2 158:18 159:20,25 160:4 167:22,23 170:20 171:4,23 177:19,25 | J-O-Y 165:13 | K |
| incorrectly 139:10 | interview 116:2,4 117:8 119:25 160:21 | jacuzzi 88:16 | Kaiser 90:8,10,18 |
| indefinitely 79:23 | interviewed 115:16 | January 66:11 67:3 70:3 85:21 171:8 | keep 100:3 156:9,13 |
| independent 108:3 111:11 112:1 | interviewing 119:19 | Jason 147:5 149:11 | keyboard 76:21 |
| individual 104:2,17 105:2 107:19,21 108:8 110:6 111:11 | interviews 115:1,14 116:6,16 118:7 119:15 | Jeff 72:12,15 111:19 | keys 158:22 172:3 |
| individually 148:11 149:1 | inventory 140:13 | job 70:18,24 75:14 76:24 80:8,12,20,21 82:15 83:9 91:3 98:11 99:17 101:9 119:11 140:16 141:16 142:5 144:2 145:8 147:12 162:15,16 175:15,18 176:10,16 | kids 87:20 |
| infection 84:20 | investigation 109:11 134:6,8,18 135:23 136:16,17,18 152:12 156:4,19 159:3,16, 20,25 160:8,9 | join 165:18 | killing 109:17 142:3 163:18 |
| information 103:19 120:22 | investigations 135:19 160:4 171:24 177:20,25 | jokes 125:17 126:13 | kind 71:2 75:11 76:5, 19 80:22 86:18 87:5, 14 88:23 89:22 91:2, 3 92:18,20 93:25 95:15 98:16,25 105:22 124:23,24 131:24 136:17,18 149:25 150:24 151:20 152:6,22 154:20 159:15 167:14 168:20 174:7 |
| informed 114:10 | involved 74:2 75:15 78:8 94:5,9 125:6 147:18 | Joy 165:11,16 166:6, 7,14,22 167:9 168:24,25 169:11 174:14 | knew 105:3 112:12 122:16,18 140:24 144:2 153:5 154:12 161:3,20 169:4,6,22 176:10 |
| initial 100:10 | involving 77:15 147:1 | July 75:22 79:9 100:9,10,11,14 133:7 135:4 136:25 154:6,10 157:13,21 159:23 160:5 161:17,18 168:4,9, 18 169:4,14,19,22 170:2,5,10 171:25 175:21 | know 71:22 74:20 78:6,10,12 80:9,17, 18,24 81:22 85:19 89:16 91:14 92:20 |
| injuries 86:5 91:17 95:25 157:19 | Ironwood 74:18 91:4 | June 146:16,18,20 149:2 154:6 | |
| injury 76:6 133:17 | issue 84:21 111:11 | justice 85:16,22 86:3, | |
| inmate 84:23 | issues 78:18 80:11, 19,20,21,22 86:4,8, 11,18 88:23 91:14 | | |
| inmates 84:5 164:25 | | | |
| inside 128:12 | | | |
| institution 74:3,7,15 75:1 91:23 94:7,23 98:3 100:2 102:14 110:1 113:7 139:18 | | | |
| institutions 73:25 83:19 | | | |

| | | | |
|---|--|---|---|
| 93:20,22 102:3 103:11 105:10,13 106:5,11 107:10 109:18 110:10,13,23 111:16 112:9 114:9 116:13,15,18 118:3, 16 121:8 122:15 124:6,20,23,25 125:1,6 126:1,5,9, 17,19 127:16 128:11,18 129:4 131:3,5,21,25 132:9 133:13,23 134:7,13 135:1,17,18,24 136:15,21 137:13, 16,23 140:18 141:7, 10 142:9,18,25 143:17 144:5,10,15 147:10 153:9,11,18, 20,23 154:1,5 155:10,18 157:3,5,8, 11,14 158:20 159:18,22,23 160:15 161:2,3 163:6 164:24 165:20 168:9,12,15,22 169:5 171:2,5,7 172:21 174:21 175:7,13 176:16 179:3,21 180:20 | laboratory 166:16 lamp 87:3 largely 71:10 late 132:17 laugh 174:2 law 180:18 lawsuit 83:18,20,24 84:2,7 85:8 133:17, 25 154:20 155:7 lawyer 153:25 154:1, 2,7,11 155:6,9 lawyers 154:24 155:1 lead 126:10 learn 162:7 learned 150:3 170:2 leasing 73:6,7 Leave 141:2 leaving 136:24 led 78:25 96:24 Lee 116:7,10 117:13 118:9,14,17,18 left 90:25 92:14 123:15,19,20 127:10,11 130:14,22 149:12 167:12 legal 156:23 legible 67:17,19 let's 92:8 102:7 114:22 124:17 136:2,3 139:3 144:3 146:10 157:13,20 160:23 177:8 179:1, 15 letter 109:8,9,13,15 110:19,21,24 111:9 112:10 113:4,11 120:17 121:5,8,14, | 20 134:9,12 160:12 161:3,4,7,8 167:22, 23 169:12,13,16,19 170:5,8,10,15,18 175:20,23,25 176:2, 13,17,24 letterhead 102:10 letters 109:18 129:13 171:13,15,21 177:25 179:7 level 71:3 96:11 108:18 lieutenant 158:20 liked 144:12 likes 132:10 limitation 76:6 limited 116:10 118:8, 18 140:17,18,19 limiting 117:14 line 109:7 lines 131:12 lingo 97:24 liquor 125:6 Lissy 72:12 78:3,14 79:5 105:9,14,18,23 106:25 107:6 111:19,20,21,23 112:3 113:10 115:7 120:17,20 121:5 Lissy's 72:15 73:9 literal 73:18 literally 71:16 140:15 152:15 163:15 little 77:3 95:22 118:10 171:24 live 90:14 load 139:11 | locally 152:20 located 72:25 location 90:10,18 122:2 Logan 115:19 118:22 119:10,16,24 143:17,19,20 144:6, 25 145:7 LOI 108:1 long 69:9,18 75:3 79:7 95:12 109:8 150:12 166:5 179:13,25 180:1 long-term 79:21 longer 118:9 139:21 look 108:19 113:8 126:13 looked 84:20,21 113:14 126:24 127:2 looking 87:2,5 102:6 103:19 115:2 123:18 129:24 156:24 looks 102:6 Losartan- hydrochlorothiazide 68:8 loss 157:19 lot 68:1 71:24 73:10, 15 74:6,8 77:6 87:8, 17,20,24 100:22 119:3 121:1 127:5 141:16 143:12 150:22 161:4 Louie 101:4,19 104:3 109:22 110:2,9 113:21 Louis 101:5 Lovastatin 68:11 |
| knowing 153:13 knows 78:22 79:1 | | | |
| <hr/> L <hr/> | | | |
| L-I-S-S-Y 72:14 L-O-S-A-R-T-N 68:8 L-O-U-I-E 101:6,7 L-O-U-I-S 101:5 L-O-V-A-S-T-A-T-I-N 68:11 La 122:2 | | | |

| | | | |
|---|---|--|--|
| lower 164:2 | matters 177:24 | memo 102:9 113:5 151:20,22,25 | 104:9,13 108:4,6 130:18 133:9 135:13,14 137:2,10 145:12 167:25 |
| lowers 163:19 | mean 69:16 70:8 77:2 78:21 80:7 83:21 89:2 100:2 129:5 130:8 138:8,20 141:1,5 142:6 144:11 150:15 155:14,24 158:23 163:9,11,15 174:7, 13 176:3 | memory 69:24 | mood 69:15,16 |
| lunch 122:5,10,24 123:1,10 125:10,12, 16 126:16 180:7 | | memos 138:4 | morning 125:9 149:6, 22 150:13 180:4 |
| <hr/> M <hr/> | | Men 74:3,15 75:1 91:23 94:7,23 98:3 100:2 102:14 110:1 | mouth 86:23 87:6 163:17,19 |
| M-A-R-T-I-N 165:13 | meaning 108:10 111:18 132:8 156:20 173:1 | mention 139:20 160:8 | move 90:9 |
| M-E-T-F-O-R-M-I-N 68:7 | means 74:9 129:12 164:1 | mentioned 139:4 | moved 96:11 126:24 166:16 |
| M.D. 122:6 | meant 139:23 163:7 | mentioning 157:18 | Muhammad 122:5,6, 18 |
| mail 113:17 | medical 73:15 76:7 84:6 88:18 89:21,22 91:17 93:9,10,11 95:25 98:15 108:18 112:17,18,24 113:1 115:22 118:24 122:20 141:2 153:23 156:23 | met 101:19,22 104:7, 8,10,12,19,21 105:1 122:16 149:12 | muscle 89:6 |
| main 177:15 | medication 67:23 | metformin 67:10 68:7 | mutiny 166:3 |
| major 114:20 121:18, 22 137:15,20 138:1, 2 | medications 67:7,12 69:1 | metrics 83:22 | <hr/> N <hr/> |
| Majority 73:15 | meds 69:2,5,10,19 80:18 | Mexican 122:3 131:22 132:3 | name 71:2 116:9 140:7 158:20 167:1 171:5 |
| making 74:3 107:5 162:8 165:9,18 | meet 77:7 83:23 149:11 | middle 146:21 | nature 119:20 |
| man 153:5 158:4 | meeting 77:16 109:2 146:12 148:13 149:5,16,25 150:4,5, 12 151:2,9 154:25 158:12 167:5,7 169:8 171:25 172:10 | mind 80:24 111:4,6 129:7,9 | necessarily 87:23 |
| manage 72:18 | meetings 77:9 154:25 166:1 | minute 110:11 122:25 177:8 | necessary 164:12 |
| management 92:19 98:5 142:3 153:7 | member 88:16 | minutes 150:16,18 | neck 86:10,18 87:5 88:5,8,10,11,19 89:17 90:7 91:1,14 92:1 |
| manager 72:9 143:15 | | missing 99:21 100:22 139:20 140:3 142:11,16 144:21 145:2 | need 67:4 108:3 146:1 160:21 161:12 168:12,15 170:17 171:17 172:12 181:13 |
| margaritas 124:10 | | mistreated 147:12 | needed 112:2,3 118:9 |
| Mariscos 122:2 | | mistreating 144:13 | needs 67:6 87:16 108:10 114:1 |
| mark 103:3 128:6 | | moment 175:14 | neutral 151:12 |
| marked 103:1,8 107:17 109:9 112:20 120:18,24 121:10 146:19 157:17 | | monitored 176:3 | |
| Martin 165:11,16 166:6,7,14,23 174:14 | | month 98:18 113:7 145:13 146:16 154:8 | |
| massage 88:13 | | months 82:13,15,22 83:5,14,17 85:2,6,11 95:4,21,23 96:2,6 | |

| | | | |
|---|---|--|---|
| <p>never 86:8,10,15 87:13 104:10,12 105:17 109:19 111:21 119:18 131:7 132:14 133:24 140:24 145:9 153:4 160:20 164:25 171:1</p> <p>new 104:9 113:15 136:8 144:10</p> <p>nice 144:14 171:8</p> <p>nicely 144:12</p> <p>Nichelle 162:14,25 166:6,22 167:9 168:23 169:11</p> <p>nine 73:24 145:12,13</p> <p>nope 159:13</p> <p>normal 87:9,10 123:12</p> <p>normally 78:17 138:22</p> <p>north 154:18</p> <p>Norwalk 93:4,12</p> <p>noted 108:2</p> <p>notes 101:25 102:5, 17 103:4,11,14,16 105:2 107:13,17 109:9 112:20 120:18,20,25 121:10 138:4 146:13 152:1</p> <p>notice 161:5 167:18, 21 171:13</p> <p>November 102:10,23 104:4 130:1 137:25 170:12</p> <p>Ns 108:2,5,10 111:13, 15 113:16 114:1 121:7</p> <p>number 71:2 95:12 116:14,17</p> | <p>numbers 103:6 166:4</p> <p>nurse 122:11</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>o'clock 157:23,24</p> <p>oath 66:16</p> <p>obtain 156:25</p> <p>obviously 137:14 149:20</p> <p>occasion 76:4</p> <p>occasionally 72:19</p> <p>occurred 75:16 78:7</p> <p>October 103:23 110:22</p> <p>off-colored 126:13</p> <p>off-the-discussion 177:12</p> <p>office 66:10,12 71:18, 25 72:2,18,22 77:20 82:23 96:6 113:5,19, 20,21 117:20,21,25 118:4,6,11 120:5 146:1 149:10,14,19, 23 150:9,15 151:17 157:25 158:15 172:18 175:23 180:6</p> <p>officer 93:10,11 112:24,25 172:2 173:2</p> <p>offices 72:20 73:3,6, 8,18 82:21 93:11 178:23</p> <p>official 88:18 89:21 152:4</p> <p>oftentimes 147:11</p> <p>oh 82:14 94:15 122:23 132:23 156:8</p> | <p>160:15,19,21 167:1 169:15</p> <p>okay 66:23,24,25 68:6,16,24 69:21 70:2,6 71:10 72:8 73:17 74:21 75:10, 13,19,25 76:10,19, 23 77:1,19 78:11 79:5 80:10 81:4 82:1,14 83:12,25 84:13,18 85:2,13,17 86:2,15,18,25 88:15 89:9,15,21 90:13,21, 24 91:7 92:12,17,23 93:6 94:5,12,22 95:14,20 96:4,15 97:12,23,25 98:1,9, 18,21 99:18,23 102:2,20,23 103:13, 24 104:2,14 105:14, 19,21 106:2,6 107:9 109:13 110:5 111:8 113:2,13 114:1,19 115:6,11,25 117:7, 11 118:5,21,22 120:15 121:17 122:15,22,24 123:7, 8 124:13,18 127:1,4, 14 129:5,19 130:5, 17 131:3 132:11 133:21 136:2,12,14, 22 138:25 140:15 141:12 143:3,19 145:18 146:9,13,15, 17 147:1 148:5 149:2 150:12 152:3 153:13 154:4,11 155:9 156:2,16 157:1,4,13 158:3,6, 14 159:1,14 160:15, 16,22 161:18,23 162:7 167:4,8,23 168:12 171:15 172:1,6,14 173:4,16 174:6,12,21 176:9,</p> | <p>13,19,23 178:22,25 179:6,20 181:12</p> <p>older 124:19</p> <p>om 181:15</p> <p>once 113:7 140:20 166:2,4</p> <p>one- 102:8</p> <p>one-page 110:24</p> <p>ones 99:14 145:3 168:22</p> <p>ongoing 78:7</p> <p>OP 163:9</p> <p>open 96:19 172:12</p> <p>opened 96:24 97:8 136:17,18</p> <p>opening 96:20</p> <p>openings 94:24</p> <p>operations 84:8,15 106:17</p> <p>opinion 108:22</p> <p>opportunity 96:17 98:2,9</p> <p>opposed 71:11 72:4 126:2,7</p> <p>option 96:19</p> <p>order 135:23 159:3 161:11 180:11</p> <p>orders 100:11</p> <p>organizational 106:4</p> <p>organize 85:18 95:6 147:23</p> <p>organized 85:19</p> <p>original 180:17,18, 19,21</p> <p>originals 178:9</p> |
|---|---|--|---|

| | | | |
|--|---|--|---|
| OT 163:5 | part 70:14 81:20 100:20,23 137:15 141:12 143:6,8,9 145:15,19 147:17 148:1 153:19 | personally 104:16 114:11 119:10 133:16 | please 72:13 102:21 165:12 166:25 |
| outcome 134:5 155:4,22 | particular 73:20 78:1 86:22 | personnel 116:5,13 117:4 118:12 143:4 145:19 | pleasure 100:20 |
| outfall 154:25 | particularly 74:5 | Phil 102:22 178:25 | plenty 180:3 |
| outlook 79:21 | parts 178:1 | phone 72:19 77:6,16 113:5 129:13 157:24 158:1,6,21 | plus 116:7 |
| outrageous 152:24 | patient 87:23,24 146:2 163:7 164:14, 23,24 172:12,13,22 | phones 72:3 | point 74:16 146:3 152:21 158:3 161:12,13,14 167:18 169:16 170:11 |
| overall 106:24 | patient's 86:23 87:16 | physical 76:6 86:5 91:8 157:19 | police 131:8 132:18, 21,25 133:8,10 134:4,24 |
| overload 87:23 | patients 72:6 87:1,8, 10 116:4,7,16 157:23 158:13 164:10,11 172:24 | physically 71:11,16, 18,23 72:17 | popped 91:9,10 |
| overworked 100:21 | pay 71:3 175:8 | physician 105:11 | population 84:23 |
| | peer 77:9 | physicians 73:13 | position 81:23 93:14 95:2 96:16,22,24,25 97:8 115:20 118:8, 13,16 130:13 135:25 136:8 139:25 142:8, 16,17 |
| P | pending 135:17 | pick 142:24 143:24 172:20 | position's 119:5 |
| | people 77:7,22 78:1 80:17 127:5,9 136:10 137:18 141:15 142:24 144:5,7,16,21 152:16 173:6,7,10 | picked 118:22 119:21 | possible 178:24 |
| p.m. 66:2 181:16 | percent 72:7 140:23 143:12 | piece 151:19 | power 132:10 |
| page 103:6,7,8,21,22 112:25 114:22 121:23,24,25 129:24 131:7 132:13 146:13,19,21 157:17,20 | Perez 83:18,20,24 85:8 | pieces 148:24 149:13 151:4 | practice 163:20 |
| pages 103:4,7 110:25 111:1 179:15 | period 84:9 90:17 | pin 85:9 169:9 | pregnant 141:1 |
| paid 123:10 127:10, 11 175:11 | person 117:5 142:10, 11,18 143:3,25 147:11 | PK 149:21 | prescribed 67:25 |
| pain 89:7,10 | personal 122:18 126:6 133:17 172:19,20 | place 72:23 78:13 81:16 150:13 151:8 | prescribes 68:4,17 |
| panel 115:7 | personalities 131:4 | places 74:13 | prescribing 69:5 |
| paper 94:11 102:10 142:15 149:13 151:4,19,23,25 | | plan 79:15,20,21,23 104:3,17 105:3,4 107:21,22 108:4,8 110:6 111:12 112:2 121:7 | present 75:12 173:6 |
| papers 148:24 | | planing 163:12 | presented 144:15 |
| paragraph 103:22 115:2 121:22 129:25 130:1 131:6 146:21 157:16 | | planning 79:23 | pressure 68:9,10 80:22 98:22 99:1 |
| parents 141:6 | | plans 80:1 | pretty 90:19 107:1 120:12 131:5 140:17 156:17 |
| Park 90:12,15,18 91:13,19,22 93:16 154:12 | | players 137:20 | prevent 68:14 |

| | | | |
|--|--|---|--|
| previous 114:7 | proper 119:22 | | reasonable 75:11 |
| previously 101:22 | properly 79:3 | <hr/> Q <hr/> | reasons 89:17 141:10 |
| primarily 84:14 | protect 154:19 | quad 163:7,9 | reassigned 176:1,14 |
| prior 113:9 | protest 108:14 | quadrant 163:5,15, 16,19 | reassigning 176:25 |
| priority 95:13 | protocol 111:16 | quadrants 163:17,20, 21,23,25 164:10,13 | reassignment 176:17 |
| prison 74:19 84:3 101:11 134:20 | protocols 140:18 | qualified 119:7 | reassume 130:13 |
| prisons 73:21 84:5 96:16 101:17 | provide 84:22 177:16 180:18 | question 71:13 80:16 85:5 91:6 92:20 120:2 126:4 137:11 | recall 86:4 178:8 |
| private 88:1 | provided 84:5 178:4 | questioning 120:13 163:4 | receive 113:17 |
| probably 124:25 143:23 150:16 151:24 154:8 | provider 105:11 | questions 69:24 115:16 156:6,7,9,11, 21,25 171:22 177:18 | received 113:15 |
| problem 76:7 82:6 105:18 107:10,11 108:7 110:17 112:7 114:20 117:16 119:17,20 137:17,21 142:18 145:4,20,23 | providers 84:25 88:11 90:6 | quiet 136:9 | receiver 83:22 84:8, 16 |
| problems 69:23 76:24 77:23,25 78:4 90:22 91:9,17 92:19 94:1 95:15,22 96:1 97:13 98:15,25 99:20 100:19 111:24 116:19 120:15 121:12,19 125:9,13 139:7 140:23 141:8 143:20,23 144:4,5 145:7 147:18,19 148:1,3,4,6,7 | psych 69:2,5,10,18 80:10,17,18 107:4 114:21 | quite 79:12 179:21 | Reception 93:3 |
| proceedings 159:21 | psychiatric 107:4 | | recognition 124:18 |
| produce 179:4 | psychiatrist 68:25 81:5 144:3 174:17 | <hr/> R <hr/> | reconfiguration 98:5 |
| professional 106:16 126:3,8 | psychological 86:5 107:4 137:8,13 | Rancho 70:7,16 72:9 73:2 75:21 79:7 81:3,7,18 152:19 154:12 | record 70:20,21,22 92:8,9 97:17,18 102:4,25 103:10 107:16 123:17 136:3,4,5 142:13 160:23,24 161:1 164:6 172:22 177:9, 10,11,13 180:10,22 |
| program 143:15 | psychologist 81:5 174:17 | read 67:17,22,23 68:3 122:1 131:6 136:5 | records 90:18 94:2 108:2 115:22 118:24 |
| progressive 106:22 | psychology 80:25 | reading 67:11 | red 128:6 |
| promoting 79:16,25 | public 148:22 | reality 142:17 143:6 | refer 103:16 |
| | publicly 148:21 | realized 149:24 | reference 161:14 170:11 |
| | pull 140:20 | really 123:15,16 132:20 137:19 142:5 145:8 156:18 | referred 134:14 |
| | pulled 89:5 | reason 81:20 89:9 90:21 95:8 99:9 143:11 | referring 102:18 107:13,17 134:12 157:14 |
| | pure 75:10 | | reflect 102:4 107:16 123:17 |
| | purely 83:9 | | Regardless 114:15 |
| | put 83:22 92:12 95:12 97:5 108:2 132:13 141:13 142:8,10 144:3 151:4,24 | | region 73:21,22,23, 25 75:20 81:15 82:4, |

| | | | |
|---|--|---|---|
| 8,15,22 83:17 84:13 110:4 175:18 176:25 | replace 140:19 142:10 | retired 132:5 | rotten 87:20 |
| regional 70:7,8,14 72:16,17 79:7 83:1,4 85:7 94:24,25 95:9, 21 96:5 100:12 101:16 105:9 108:17 109:8,25 110:3,4,11, 13 136:8 159:5 175:3,15 176:1 | replaced 141:15,16 | retirement 79:20 | round 116:15 |
| regular 77:23 94:18 | report 90:21 100:11 132:18,21,24,25 133:8,10 134:4,16, 19,23,24 135:2,5 136:19 148:5 159:25 | retires 96:20 | Rowena 115:17 140:8 145:9,19,22 146:8 167:10 169:3,5 |
| regularly 142:21 | reported 86:8,10,15 148:7 | review 77:10 111:17, 19 112:1 | rude 120:1 |
| related 89:10,13 138:2 139:12 156:4 171:23 177:19,25 | reporter 177:9 180:11,22 181:5,13 | rid 95:2 96:10,12 97:2,5 | run 103:15 |
| relates 107:6 | represent 157:8 | right 67:11,14 76:18 78:19,22 79:9 83:15 86:2 87:6 92:3 93:17,23 94:13 95:20 96:9,25 98:25 99:18,23,24 100:6, 15 105:5,7,10,15,23 106:8,9,24 108:7,21 110:24 112:14,22 113:2 114:8,25 115:13 116:22 118:17 120:24 121:8,9,18,21 122:4 123:13,15 127:16,17 130:3,5,8,20 131:20 132:11 134:7 135:16 136:2,14 145:15,16 146:9,15,22 147:12, 16 148:12 149:20 152:3,10 153:18 155:9 156:2,16 157:11 159:18 160:2 161:10,11 162:25 163:23 165:6,14 167:19 170:3 171:20,21 174:24,25 176:11,23 177:14 178:12 179:24 180:8 | rundown 77:1 |
| relating 102:13 | request 156:24 | required 76:3 | running 150:19 |
| relations 112:24,25 114:20 137:19 | requires 71:19 | reschedule 172:23 177:22 | <hr/> S <hr/> |
| relationship 80:20 92:19 94:1 107:1 121:6 137:8 162:15 | rescheduled 164:12 | resources 116:5 143:4,10 152:5 | S-E-R-R-A-T-O 117:2 |
| relaxed 127:8 | respect 131:10 | respect 131:10 | Sacramento 96:14 113:6 152:19,20 165:4 |
| relief 152:16 | respected 144:12 | respond 128:22 159:11 | Sam 115:17 140:8 145:9,19,22 146:8 167:10 |
| remember 66:13,18 67:25 69:3 75:7 83:25 84:2 85:19 92:5 98:18 120:16 125:21 128:14 129:1 137:7 150:22 158:21 166:8,21 171:10 172:6 177:3 | responding 132:15 | responsibilities 138:15 | San 66:1 154:16 |
| remembered 67:2 138:3 | rest 139:1 172:24 | rest 139:1 172:24 | sat 126:2,5 |
| remotely 72:19 | restaurant 122:3 127:5 131:22 132:3 | restaurant 122:3 127:5 131:22 132:3 | satisfied 114:17 |
| removed 96:15 114:2 | result 114:17 | result 114:17 | save 68:1 |
| reorganized 97:2,3 | results 166:12 | results 166:12 | saw 111:21,25 131:15,16 132:1 173:14,20,23 174:4 |
| repeat 71:12 85:5 126:4 | Resumed 66:7 | Resumed 66:7 | saying 71:20 86:25 88:3 89:20 99:20 100:3 104:15 108:12 119:16 125:19,22,23 130:8 134:12 141:12,21 142:15 157:25 161:8 162:2 164:21 174:8 |
| | resworn 66:5 | resworn 66:5 | says 97:7 102:11,13 104:2 115:4 120:1 122:5 129:25 146:19 149:8 172:13 |
| | retire 79:24 80:2 | retire 79:24 80:2 | |
| | | right-hand 128:3 | |
| | | rights 148:25 | |
| | | ring 128:17 | |
| | | Robert 109:14,15,20, 24 | |
| | | root 163:12 | |

| | | | |
|--|---|---|--|
| scaling 163:12,22 | seniority 96:21 | signed 117:9,17 118:20 141:8 | 150:19 153:6 154:12 161:14 162:19 173:18,20,23 174:4 |
| scenarios 147:17 | sense 87:1 133:24 152:23 | significant 75:14 137:7 | Soohoo 66:4,9 97:20 102:4 103:3,9 107:16 123:17 131:3 136:7 148:20 177:15,19 179:3,16 181:8,11 |
| schedule 116:4,7,16 163:6 178:23 | sent 112:11 150:3,8 156:6,21,25 160:12 161:19 175:20 | signing 114:13 178:19 180:24 | Soohoo's 103:14 |
| scheduled 115:14 156:3 158:13 | sentence 113:1 | single 77:3 | soon 178:24 |
| scheduling 140:12 | separate 159:21 164:1 165:19 | sir 68:5,23 70:17 71:21 79:14 81:17 84:12 99:25 100:25 103:18 112:4 137:1, 5 | soreness 86:20 88:5, 8 89:18 90:17 91:1 92:1 |
| SCIF 102:12 | sergeant 158:15,17, 24 | sit 79:19 105:17 | sorry 69:4 97:20,21 169:15 |
| scores 119:18 | Serrato 116:23,25 117:22,24 | sitting 77:5,15 123:13,14 146:1 155:5 165:4 | sounds 139:15 168:16 |
| scoring 95:12 | service 73:14 | situation 127:7 129:6 139:22 | southern 73:22,23,25 93:3 |
| scratch 151:23,25 | services 70:12,15 75:20 | six 87:12 133:9 | space 84:22 |
| scream 120:10 | session 66:15 | six-and-a-half-page 120:25 | spacing 84:21 |
| screaming 163:2 166:20 | set 103:11 120:25 158:22 180:2 | six-page 102:9 | speaks 158:7 |
| screen 76:22 | sexual 106:12 | slapped 126:20 | special 76:21 |
| second 70:20 84:21 103:21,22 112:7 116:3,15 118:7 121:22,24 129:19 136:3 | share 72:18 | slapping 126:11 136:23 137:3 138:11 | specific 71:14 80:15 83:22 154:23 |
| secretary 113:24 | Shaun 69:6 | Slow 118:10 | speed 66:20 |
| sections 164:1 | Shirt 128:10 | smaller 124:21 | spell 67:22,23 68:3 72:13 117:1 165:12 166:25 |
| sector 88:1 | shocked 127:3 | smile 174:6,7,13 | spellings 67:13 |
| see 68:25 71:20 85:9 87:10 90:9 91:8 103:8,19 128:5 130:25 134:2 146:2 155:3 157:16 164:24 179:11,15 | shocking 131:6 | smiled 174:5,6 | spend 84:1 87:17 |
| seeing 157:23 172:13 | short 84:18 140:22 | smoothly 77:25 | Spent 86:23 |
| seeking 152:16 | shortage 143:5 145:1,4,8,15,19,23 | snickered 126:25 128:25 | spoke 113:7 130:4 133:18 154:16,17,18 |
| seen 89:24 | show 102:15,16,20 114:7 146:13 | so-called 84:4 | spoken 78:25 119:5 |
| send 152:20 156:7 161:4 180:23 181:2, 10,11 | showed 130:19 | social 122:12 | SRPS 163:5,10 |
| sending 178:9 | sick 141:6 | somebody 94:15 96:20 107:23 113:18 123:21 125:17 | |
| | side 128:3 | | |
| | sides 73:15 | | |
| | sign 94:11 113:16 114:16 180:19 | | |

| | | | |
|---|---|--|---|
| staff 73:11,12 99:3,4 100:24 107:24 137:19 148:4,6,13, 19,22 149:11,12 150:20,22 151:6 161:23 | stressed 122:2 130:1, 22 148:22,25 167:12 | 99:5 100:22 152:25 153:2 | 122:9,24 132:22 133:24 140:15 141:10 147:16 150:12 151:15 152:3,15 155:2 164:4,5 175:2 180:7, 24 |
| staffing 143:5,9 145:1,4,8,15,23 | stressful 138:7 139:19,22 146:20 | support 137:23 161:23 | taken 151:8 |
| stand 112:23 147:6 | strokes 68:14 | supported 151:12 | talk 90:6 108:15 136:11,12,13 144:7 157:13 163:22,24 166:12 171:21,22,24 177:24 |
| stapled 102:9 | structure 98:6 106:5 | supportive 144:16 150:23,25 151:14 | talked 95:21 129:16, 22 132:22 144:6,25 148:23 169:21 179:6 |
| start 92:21 101:24 160:9 180:4 | structures 84:22 | supposed 111:20 116:2 143:6,10,11, 13 147:11 148:10 149:1 | talking 77:16 81:4 83:5 84:11 85:3 99:19 100:5,8 105:23 109:18 113:9 115:12 117:17 123:12 126:16 139:4,24,25 143:5 144:4 146:14 151:6 155:1 159:9 174:17 179:16 |
| started 66:11 74:11, 18 92:5 98:19 103:25 121:6 132:20 139:4 159:15 160:4 | stuff 71:25 73:17 152:21,25 153:22 172:3,5,17,19,20,21 | sure 66:20 67:13,19 68:2 82:10 89:12 90:19,20 92:16 102:1 111:7 120:20 129:8 131:1 135:10 156:10,23 157:6,7 178:6 179:2 | Tammy 166:24 167:1, 9 168:23 169:11 |
| starting 91:4 | subject 95:13 119:7 | surprise 78:21 | TAYLOR 66:8 67:21 70:20,22,23 71:15 74:10,12 79:11 83:3 92:8,11 93:5 97:17, 19,21,22 102:22,25 103:2 113:25 124:9, 16 128:2 131:2 135:11 136:6 140:2 160:23,25 162:12 164:5,7 173:17 177:8,10,12 178:11, 13,16,21 179:6,10, 20,24 180:5,8,23 181:5,8,12 |
| state 73:5 74:19 80:24 161:4 | substandard 84:4 | suspended 175:2,8 | |
| stated 130:24 | sudden 125:5 126:11 | sustain 161:9 | |
| statement 129:5 | Suddenly 123:15 | sustained 166:9 170:9 | |
| status 175:6,7 | suing 133:15 | symptom 76:6 | |
| stay 149:23 | suit 128:8 171:9 | system 84:3 87:21 95:13 98:23 99:1 100:20 119:7 152:10 166:5 176:21 | |
| stayed 149:15 | Suite 73:2 | systems 84:14 | |
| step 96:7 | sum 84:1 | | |
| stick 157:20 | summarize 97:23 105:17 111:8 | T | |
| stoop 89:14 | superior 72:8 | T-A 167:1 | |
| stop 108:21 177:8 | superior 72:8 | table 124:11 125:23 126:2,5 127:12 | |
| street 73:1 122:4 124:18 152:23 | supervise 138:14 | tables 77:16 | |
| streetwise 125:4 | supervised 107:23 | tabulate 119:18 | |
| stress 80:25 86:5 102:13 107:5 127:7 137:8 138:14,17 139:8,10,11 141:13 144:8 146:5 153:20, 21,22 | supervising 70:19,24 71:4,7 72:1 95:1 96:11 97:1,6,9 98:4, 12 115:17 138:13, 18,21,24 139:9,12, 13,20,23 140:1,3,13 141:14 143:11 145:2,11 167:10 | take 84:8 88:7 100:23 | |
| | supervisor 72:8 78:3, 15,22 92:23 93:2,15 99:3,4 101:2,3 105:8 107:10 139:17 145:17 | | |
| | supervisors 80:13 | | |

| | | | |
|--|---|---|--|
| tea 124:8 | 97:7 118:12 125:3 | 117:25 129:10,20 | transfer 75:19 80:8 |
| team 84:24 | 126:21 146:11,12 | 131:15 132:19 | 94:16 96:18,25 98:3, 10 |
| teenager 87:25 | 161:3 | 140:24 141:10 | transferred 78:8 |
| teeth 87:5,20 128:13 163:19 164:2 | things 66:20 71:19,23 | 150:17 153:1,21 | 91:21 92:25 94:22, 25 95:8 96:5 97:9 |
| telemedicine 73:10, 16 | 77:17 78:7,12 80:22 | 154:2 161:19 164:25 | 98:12 101:20 110:10 175:3,9 |
| tell 67:9,23,24 68:3,4 75:5 77:2 86:15 | 81:6,9 88:13 106:9, 17 126:15 131:4 | 165:21 166:10 171:7 | transferring 78:19 |
| 97:25 102:16 103:18 | 137:14 141:17 | 175:8,10 179:11,12, 14,25 180:1,3,14 | 79:15,24 94:5,10 |
| 114:19 118:8 122:6 | 152:17 168:13 | timelines 106:3 | transitioning 81:23 |
| 130:11 131:12 141:7 | think 67:4,5 69:23 | times 89:1 163:8 | treat 79:3 144:12 |
| 143:2 144:16 146:4 | 76:5 90:8 100:9 | 164:12 167:16 | treated 78:24 166:19 |
| 147:4 157:21 176:14 | 102:6 122:12 126:6 | 168:14 | treating 81:5 |
| telling 104:22 119:23 | 130:12 132:24 | title 70:18,24 72:15 | treatment 80:10,11, 18 84:5,7 88:10,18 |
| 125:17 126:13,14 | 133:15 135:9,10 | 83:12 98:11 101:9 | 89:22 90:16 |
| 136:10 139:15 | 140:5 151:14 154:16 | 162:16 | tremendous 138:14, 16 |
| 150:24 151:11 | 156:14 158:4 161:2 | title-wise 83:11 | tried 108:15 111:11 152:15 166:2 |
| 152:14 155:5 159:6 | 170:12 176:6,20 | today 66:9,17,21 | triglycerides 68:13 |
| 161:18 164:8 177:21 | 179:16 | 69:10,21 78:9 79:19 | trouble 153:10 158:4, 8 |
| tells 89:13 156:16 159:14 | thinking 69:24 81:22 | 129:10 132:14 | true 74:25 119:6 147:21 |
| Temecula 154:17 | 132:20 136:7 152:23 | 135:24 | trusted 110:16 |
| ten 75:4 81:12 | 154:20 158:7 | told 67:3,5 68:19 69:7 | try 80:7 117:21 153:4 177:17 |
| tequila 124:10 | third 113:1 | 71:24 91:11,13 | trying 71:16,22,25 |
| term 116:10,17 | thought 153:15 | 96:23 113:16 117:8 | 74:13,20 79:20 85:9, 17 91:7 95:6 120:21 |
| 117:14 118:8,18 | threaten 106:19,21 | 118:1,3,4 119:6 | 124:17 125:2,3 |
| 140:17,18,19 | threatened 131:21 | 121:4 122:9 125:3, 15 134:23 137:16 | 126:10,13 135:22 |
| testified 66:5 | three 71:8 82:13,15, 21 83:5,14,16 85:2, 6,11 95:3,21,23 | 143:24 146:1,7 | 137:12 147:23 |
| testifying 66:16 | 96:1,6 108:4,6 111:1 | 149:22,24 151:7,8 | 151:13 153:1,7,10 |
| testimony 66:16 71:24 | 135:12,13 137:2,10 | 158:11 167:13 | 166:3 169:9 |
| texting 129:12 | three- 102:8 | 168:22 172:1,23 | tunnel 76:9,12,20 |
| Thank 68:16 | threw 123:20 151:24 | top 115:3 138:15 140:22 | |
| Thanks 111:8 | tie 128:10 | topic 129:1 | |
| therapy 88:13 | time 68:1,20 69:8 | track 84:9 | |
| thing 66:22 77:3,8 83:7 84:21,23 91:25 | 70:4 81:23 83:4 | trained 105:11,14 | |
| | 84:1,9,13 85:7 86:2, 23 87:17 88:7,19 | transcribed 178:3 | |
| | 89:14 90:17 91:2 | transcript 180:14 | |
| | 99:16 100:1,13 | transcripts 178:18 180:25 | |
| | 101:19 104:7,19 | | |
| | 107:1 108:14 113:22 | | |

| | | | |
|---|---|--|--|
| turn 158:21 | understood 95:14 162:3 | walked 116:23 117:21 120:5,14 132:19 133:6 136:24 144:23 146:16 167:25 168:2,8 169:21 172:1,2 173:10,13 174:24 175:13,14 176:6,9 | 143:11 149:10 154:5 156:24 161:10 166:10 170:17 177:22 178:2,17 179:16 |
| turned 152:20 | unethical 106:14 | | we've 85:3 91:1 92:20 95:21 120:18,24 121:10 177:12 |
| two 68:25 69:20 71:7 79:12 104:9,13 108:6 110:24 111:13,15 116:14, 17,19 121:7 125:12 138:5,10 146:3 | union 136:17 | | week 100:12 122:9 175:5,6 |
| two- 102:8 | unit 145:25 | walking 113:5 | weigh 109:6 110:17 156:20 |
| two-day 115:14 116:2 | unobtained 177:14 | want 67:13 95:5 100:13 102:15 119:4 133:23 138:6 150:11 153:23 163:6 168:13 172:17 178:21 180:1,11 | went 74:16 81:6,20 82:16 83:1 88:16 90:19 91:15,18 108:17 113:19 116:1,2,5 117:20,22, 24 118:11 123:9 125:10 126:16 132:23 145:12 154:14 158:15 165:14 |
| type 77:7,20 | upper 164:1 | wanted 84:16 93:25 106:4 116:11 119:4 132:19 151:4 152:18 153:21 | weren't 83:13 176:17 |
| typed 152:1 | uppers 163:19 | wants 179:3 | wife 122:23 123:14 126:21 165:14 |
| typical 77:2,8 | use 97:24 101:24 178:5 | warden 147:7 | WITNESS 92:10 93:3 113:24 124:15 128:1 131:1 135:9 140:1 162:11 173:16 179:5,18 181:14 |
| typing 72:3 77:5,17 | usually 149:6 | wasn't 82:1,6 87:23 101:13 114:10 119:1,10 131:14 139:24 144:21 145:7 162:1 164:13 176:10 | witnesses 167:6 |
| | V | watch 104:24 | women 141:5 |
| | VA 69:9 | watching 173:6,8 | Wonder 165:14 |
| | Vague 74:8 | water 124:7,8 | wondering 137:24 |
| | verbally 107:13 | way 78:24,25 81:11 91:5 92:12 99:19 102:8 128:22 131:22 144:3,13 | word 73:1 |
| | verbatim 68:8,10 163:9 177:13 | ways 168:15 | words 90:5 96:15 118:1 126:15 129:7, 8 133:19 139:12 147:10 154:23 163:12 174:16 |
| | virtue 93:14 | we'll 129:19 166:11 180:2,21 181:5 | |
| | visit 132:12 | we're 66:9,10 67:7 78:9 83:5 85:17 90:24 100:5,8 115:12 116:3 117:13 | |
| | Volume 66:11 67:3 70:2 85:20 177:17, 23 178:2,3,5,6,17,22 180:23,25 181:6 | | |
| | volumes 178:5,9 181:8 | | |
| | W | | |
| uh-huh 71:6 74:22 90:2 100:16 102:23 103:23 113:3 115:5 128:4 131:18 134:25 139:6 141:19,22,24 146:23 147:13,24 151:21 156:1 165:23 166:13 168:3,5 169:1 172:4,7 174:9 | wait 110:11 155:3 | | |
| ultimately 133:25 | waiting 134:2 149:21 155:22 | | |
| underneath 87:2 102:11 | wake 89:1 | | |
| understand 74:10 80:5,15 99:10 106:4 111:13 119:9 121:16 123:4,24 125:16 131:13 134:23 135:21 141:3 145:18 166:10 169:9 176:5 | walk 157:13 159:3 172:2,14,15 173:2,3 | | |
| understanding 74:1, 14 | | | |
| understandings 180:9 | | | |

| | | |
|---|---|--|
| <p>work 71:11,18,25 72:2,4,6,21 74:6 75:14 76:20 77:9,20, 22 80:19 84:24 87:24 89:10,13 90:22 91:7 92:18 106:9 114:20 115:21 116:12 128:9 136:10,12 141:13 143:10 144:4,7 145:24 160:17 162:21,22 165:2 166:4 167:11 172:5 174:18,22 175:3 178:23</p> <p>worked 74:13,25 75:16 93:24 104:11, 13 108:9 110:12 122:13,14 144:1 162:20,24</p> <p>worker 122:12</p> <p>workers' 71:17 74:2 75:15 86:4 88:7 91:2,8,17 95:25 98:14 141:14 144:17 145:12 154:1 156:21</p> <p>working 70:3,6 74:14, 16 75:25 76:4 77:24 79:22,23 80:13 84:14 85:7,13 87:1,4 91:14,24 92:2,7 103:25 104:8 107:5 114:21 116:10,18 136:7 163:21 172:22 176:4</p> <p>workload 87:15 99:21 100:23 137:17 138:23 139:8,11,14 140:9 142:25</p> <p>workman's 99:7 140:6</p> <p>workplace 93:25 95:15 97:12 99:2</p> | <p>153:1</p> <p>workplace-related 98:15</p> <p>works 93:20 108:4 118:24</p> <p>world 147:25</p> <p>worse 76:15,17</p> <p>wouldn't 114:11 132:22 136:15</p> <p>wow 136:16</p> <p>write 103:5 106:21</p> <p>writing 103:6 111:16 177:21</p> <p>written 103:9 112:9</p> <p>wrong 108:11 109:7 114:7 153:2,18 159:15 176:18,21</p> <p>wrongful 108:23</p> <p>wrote 67:11 109:8 110:19 113:11 121:5,21 130:24 134:9,11 151:25</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>yeah 67:12 100:5 102:1,23 109:16 110:7,9 112:22 118:24 127:21 128:4 141:4 150:20 157:12 161:7 165:11 169:7, 15 171:6 179:1</p> <p>year 75:23 79:13 85:9,10 90:24 92:6 107:23,25 108:9,11 111:14 121:8 132:19 133:14 135:6,7,8,13 137:2,10 140:6 160:18 162:5 170:12,22,23</p> | <p>years 69:20 75:4,5 79:13,17,24 81:12 82:8,12 85:18,23,25 86:13,19 88:8,12,24 89:23 90:7 91:11,18 100:5</p> <p>yell 120:10 167:6</p> <p>yelled 164:23 166:7 167:5,8,11</p> <p>yelling 161:21,25 162:1 163:2,3 164:17 166:14,20</p> <p>younger 124:19 125:1</p> <p>Youth 93:3</p> |
|---|---|--|

November 7, 2018

Dr. George M. SooHoo

CONFIDENTIAL MEMO:

Addendum to the SCIF Claim.

Stress Relating to my Employment at California Institution for Men.

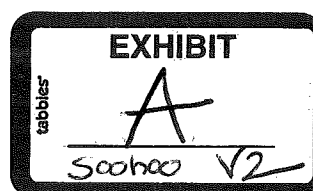
Date: From 2013 to 2015. Highly Stressed thru the Investigation.

Investigation regarding the issues of Ms. Nichelle Davis, RDH was changing dental treatment plans. Mr. Ronald Wortham, HPM III, reported to me that Ms. Consuelo Zen informed him that Ms. Nichelle Davis was changing treatment plans. When I reported this to Mr. Robert Herrick, CEO, he questioned me in regards to the information I received. I informed him that I received that information from Mr. Ronald Wortham, HPM III, and he indicated to me that he was given that information from Ms. Consuelo Zen, RDA. When the CEO, Mr. Robert Herrick questioned Mr. Wortham, he denied telling me that information. Ms. Consuelo Zen also denied telling Mr. Wortham that information as well. During the investigation, the truth finally surfaced and Mr. Ronald Wortham admitted to Mr. Herrick that he did informed me of what Ms. Zen told her. I finally salvaged my credibility in being honest and truthful in reporting this incidence because they had other motives to discredit me.

Date: October 15, 2015 to April 25, 2016

Individual Development Plan (IDP) Highly Stressed

I was given Individual Development Plan (IDP) by the CEO, Mr. Louie Escobell, on November 30, 2015. Mr. Escobell just started taking over as the CEO approximately in August or September, 2015. I had two areas that he claims I needed improvements on the IDP. I went in to speak with him and I felt degraded with his response. I informed him that when I write IDP's for all my staff and that for any "needs improvements," this has to be justified through a "Employee Counseling Report" or "Letter of Instruction." I never received an ECR or LOI that year. Since I was not able to discuss this issue with him, I elevated this up to the Regional Clinical Director, Dr. Jeff Lissy and Mr. Robert Herrick, the Regional Director for an appeal. According to Policy, the CEO and the Regional Clinical Director has equal weight in my evaluation. Ms. Cindy Ballou, the Medical ERO indicated to me that she will be looking into the issue. On April 26, 2016, I received a letter from Mr. Louie Escobell (CEO) that the IDP dated November 30, 2015 should be removed from my OPF file, and I was given a new IDP.



Date: Approximately early 2016. Do not know exact dates for the HPM III Interviews.- Highly Stressed.

HPMIII Interviews were scheduled to be for two days due to the high number of candidates. Panel consist of Mr. Louie Escobell (CEO), Dr. Jeff Lissy (Regional Clinical Director), and myself. At the end of the interviews, Mr. Escobell asked if there are any comments regarding the candidates interviewed today. I informed the panel that Ms. Rowena Sam, the Supervising Dental Assistant shared with me that Ms. Debra Logan (Supervisor Medical Record) who was a candidate was not very nice to the Dental Assistant when they needed the Medical Records). The following day, Dr. Don Lee, DDS, asked about his limited term status with CIM so I decided to go ask Personnel, Ms. Belinda Serrato if we were going to continue the Limited Term Position. When I was in Personnel, I also asked her if we were still interviewing the rest of the HPM III candidates and she informed me that the rest of the candidates cancelled their interviews. When I approached Mr. Escobell in his office regarding my visit to Personnel regarding the Limited Term Position for Don Lee, DDS, , Mr. Escobell blew up and asked why I went to Personnel to ask about the HPM III position. He did not allow me to explain so I just left and never brought it up again. I did not feel like my input was important to him and he did not have to listen to anything I have to say.

Date: April 21, 2017 Extremely Stressed

Location: Mariscos Las Brisas- Chino, CA

Lunch with Dr. Muhammad Farooq, MD, Mrs. Muhammad Farooq, and Mr. Louie Escobell.

At about 12:15 p.m. we were all eating lunch and were just having normal conversation and Mr. Louie Escobell strikes me in the face very hard because he was sitting next to me. Dr. Farooq was shocked and his wife was extremely shocked and the first thing that came out of her mouth was "why did you hit him in the face and so hard?" Mr. Escobell just smiled and laughed it off. I was in total shock myself, and my face felt numb for a few minutes and I was able to keep my composure because there were too many people in the restaurant to make a scene. Dr. Farooq, the next day came and spoke to me and indicated he spoke to Mr. Escobell and informed him that he cannot lay hands on anyone and that he would not do it again. Dr. Farooq was afraid I would file assault charges. My wife, to this very day, was very upset with me for not filing charges. After this incidence, I also informed Dr. Jeff Lissy of what had happened as well. Since this incidence, I have avoided Mr. Escobell due to his uncontrolled abusive behavior and to this very day, I do not know why he acted the way he did, nor did he ever apologized. I have kept this inside of me for close to a year and I was full of anger, humiliated and depressed when I would think about that incident and finally I had to seek professional help and see a Psychologist.

February 1. 2017 to November 2017. Highly Stressed.

Stress reached a high point starting in February 1, 2017, when my Supervising Dental Assistant left work due to medical issues. She did not return till November, 2017. There are (15) Dental Assistants and managing them is a mental and stressful challenge due to the CIM culture even before I arrived to CIM as the Supervising Dentist. Getting them motivated to meet the mission was a challenged because 70% of them were on FMLA, and we also had to conform to their BU 20 contracts. I was already Supervising

2

(6) Dentists, (2) Dental Hygienists, with Dental Clinical requirement of 45% +++ to see patients. I am also required to attend all Executive Staff meetings, and the Wardens meeting on a weekly basis. I have two people whom I report to directly is the CEO, Mr. Louie Escobell, and Dr. Jeff Lissy, the Clinical Regional Director. Her long term absenteeism and lack of decision making was very stressful. When a unfavorable decision that had to be made to the Dental Assistants, she would tell them it was Dr. SooHoo's decision.

I always try and surpass my Clinical Requirements because I enjoy seeing patients. My average monthly production is from 60-85%, and my monthly minimum is 45%. I am highly stressed when the CEO or the department heads changes or cancel their executive staff meetings the same day. My ducats to see patients has to be put in the day before and if I cancel, this is a ding to my dashboard. I am probably the only Supervisor that has a required 45% Dental Clinical requirement. It does not impact any of the other Executive Staff because they do not have to see patients. I have mention this several times to the Ms. Monica Lopez, (CEO Executive Secretary) and Mr. Escobell, but there is no resolution. The meetings are on a monthly basis consisting of CEO Medical Executive Meeting, Medical Utilization Review Committee, Patient Safety Meeting, Dental Subcommittee Meeting (Chair), Pharmacy Review Committee, Wardens Meeting, Medical Services Meeting, Infection Control Meeting, Tool Control Meeting, Regional Dental Director Meeting, HQ Dental Staff Meeting, and a host of others.

It is always stressful when there are disagreements between what the CEO wants and what HQ or the Regional Director wants like the responsibility of the golf carts for movement to the different yards. HQ says the golf carts belong to the Dental Department because they were purchased by the HQ Dental Budget, but the CEO says the golf carts belongs to him and it is at his discretion to issue the carts to the different departments like Medical Records, Medical Lab, Pharmacy, etc. The Supervising Dental Assistant always come and complains to me about the golf carts and wants our golf carts back when they have been given to other departments by the CEO and the HPM III. Very rarely, does she try to solve these issues on her own, but she burdens me the stress to solve these issues because the Dental Assistants and the Office Technicians are the only ones in the Dental Department that uses the Golf carts. I try my best to resolve these issues and a host of other problems due to the strong personalities and the conflicts that these issues present to the CIM Dental Department. I have always set the bar very high for myself due to my work ethic and my commitment to the Department. Being in the military for 30 years, I have always been professional, integrity is vital, respect and accountability is a must. My Dental Clinical Requirements has always been met on a monthly basis with a range of 65% to 80%, which 45% is mandated. I always try my best to attend all the required meetings at the request of the CEO. All the stress was on me to make decisions to run the Dental Department when my Supervisor Dental Assistant was gone for a long period of time with 70% of my staff on FMLA or Workman's Comp issues. Majority of the problems are with her Dental Assistants if I tell her what she has to do, she will go out on stress once again or run to the CEO that I am stressing her out. Ms. Rowena Sam is very clever in working the system and when she has to deal with the problematic Dental Assistants, she wants me to handle them. Her high absenteeism has placed much stress on me to ensure the right decisions are made for the Clinical Operational needs.

3

June, 2017 to September, 2017 Highly Stressed.

Very few people volunteer for the Acting Supervising Dental Assistant Position. When Ms. Joy Martin took over from Ms. Mercedes Chavez, as the Acting Supervising Dental Assistant, she was very critical of Ms. Mercedes Chavez during her term as the Acting Supervising Dental Assistant. She wrote e-mail criticizing her of decision making and incompetence. This e-mail was sent to the CEO, Mr. Louie Escobell, and the Regional Administrator, Dr. Jeff Lissy. I spoke to her personally about sending those type of e-mails out without even letting me know of the issues. I asked her several times to follow the "Chain of Command." She would hear me but never follow the directives. She would report to the HPM III, Ms. Debra Logan and I would never know about the Clinical Operations of her staff. Since she was only in the position for a short period of time, I tried my best to work with her but she would continue to try to avoid me, because I am her direct Supervisor. She would get overtime approved through the HPM III, Ms. Debra Logan and I would never know about it till she brought her 998 to me for signature. Ms. Mercedes Chavez, Dr. Chikka Raju, and Dr. Thant Zin has informed me that Ms. Logan is trying to undermine your authority. I just informed them that she does have authority to authorize overtime and it would be nice if she came to me to discuss the overtime issues. I was trying to have everyone work as a team and get our work done so we can all go home.

February, 2018—Very Stressful

I left on Vacation for two weeks, and I asked Dr. Tiffany Spencer to be my Acting Supervising Dentist during this two week. I gave her a directive that please do not let any Clinical Staff leave early unless they wanted to take their own time or if it was an emergency. I found out one Friday, Dr. Spencer asked our HPM III, if she can let everyone go home early at 1:00 P.M., and she left early and asked Dr. Chikka Raju to be the Acting Supervising Dentist during her early departure. This caused a lot of friction between the two of them because DR. Raju was torn between following my directive of not letting staff off early versus letting staff off at 1:00 P.M. After I returned, I spoke to Dr. Spencer about my directive and she had no comment. I tried to give her an ECR, but the Medical ERO, said I could not because it was approved by the HPM III. The other issue was Dr. Spencer would come in late on a regular basis, like 7:30 to 7:45 a.m., and two of my Dentists, Dr. Raju and Dr. Zin, spoke to me and said it was not fair that I allow her to sign in late every day. I spoke to Dr. Spencer many times about coming to work on time and she gives me the same answer that she has traffic issues. I spoke to the Medical ERO and she recommended everyone sign a Letter of Expectation of what the Clinical hours would be from 7-3:00 p.m. The Medical ERO wanted to inform them in a signed agreement and they must show a pattern of being late all the time for any Progressive Discipline. This issues was finally resolved for now. In March, 2018, the Regional team arrived and indicated to me during the audit that many of our exams were not being completed due to Providers sending them to the Hygienist for Debridement and the charts would get lost and the exams were never completed. The Audit team revealed to me that the



majority of the ones that were not completed were Dr. Spencer's Comp Exams. Immediately, I spoke to Dr. Liao, Dr. Giang, and Dr. Lissy and decided to make sure the Dentists do the debridement the same day and not refer it to the Hygienist, to complete the Comprehensive Examinations. This caused a lot of stress because Dr. Spencer felt I was targeting her when I was only trying to solve the issues from the DCAT Audit as well as her reporting times to the CIM Clinic due to DR. Raju and Dr. Zin's comments about fairness.

June 18, 2018. Highly Stressful

I would have my normal morning huddles every morning at 7:00 a.m. with only my Dentists and Dental Hygienist. The CEO, Mr. Louie Escobell and the AW Mr. Jason Bishop (EEO Coordinator) requested that I do not attend the morning huddle with my Dentists and Dental Hygienists. They rounded up all 30 plus staff members including my Dental Assistants and gave them a letter asking them to fill out the letter if Dr. SooHoo has ever verbally abused them? I have been working at CIM over 10 years and I have given out Employee Counseling Letters, Letters of Instruction, and Adverse Action against staff. This was an open forum for retaliation, and they were soliciting for handwritten grievances from my staff. EEO should be handled confidentially and it has to be filed individually and not being solicited. They have violated my rights in regards to the confidentiality in an open forum and this was a mutiny to discredit my reputation. No one gave me the opportunity to hear my version or to defend myself against these alleged allegations.

July 6, 2018- Extremely Stressful

I was asked by the CEO, Mr. Louie Escobell, to come to his office and he informed me to relinquish my ID, my phone, and my keys, and I was escorted to my office in the D Yard Main Clinic by an Officer to gather my belongings and to be walked off the grounds at CIM while they do their investigation. I asked him can I have copies of the EEO allegations against me and he said "no". This was extremely stressful and embarrassing to be walked off in front of my whole staff from the D Yard Dental Clinic with no prior notice over EEO allegations. After weeks and months and up to this very day, I have sleep issues, I have headaches, nightmares, loss of appetite, and this has tarnished my reputation that I have established for the last 40 years. There is not a day that does not go by that I try to decipher what I have violated in the EEO Policy because I was the EEO coordinator in the military for close to 29 years. I have not sexually harassed anyone, I never use vulgar or foul language, or racial epithets, and I always try to be fair with my staff so they do not perceive favoritism. I do not verbally abuse anyone but I hold people accountable, and I expect everyone to do their jobs, be respectful and professional.

Occupational Issues:



Hearing Loss:

Hearing Issues for the last 15-20 years, due to the high frequency hand piece we use for drilling and surgical extractions. I have lost 70% of my hearing in my left ear and 40% in my right ear.

Back Issues:

Back Issues: After close to 40 years in practice, most Dentists have back issues. I have pain in my back on a monthly basis and I see chiropractor, massage therapist, and physical therapist.

Hand Issues:

Hand Issues: I have arthritis, rheumatism, and on both hands. I also has mod carpal tunnel and many time my hands and fingers go numb. I soak my hands in Epsom salt and go into the Jacuzzi for my hands and back for therapy. I use a handball to do hand exercises by squeezing the handball a couple of hundred times per day. I have been having tightness of my hands and muscles for the last 20 years.

A handwritten signature or set of initials, possibly 'E', enclosed within a hand-drawn oval shape.