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Transcript of Shanita McCall

Date: March 22, 2022
Case: Diamond -v- Smith

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1 UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF GEORGIA
3 MACON DIVISION

4 - - - - - x
5 ASHLEY DIAMOND, :
6 Plaintiff, : Case
7 v. : No. 5:20-cv-378-MTT
8 ARNEIKA SMITH, :
9 Defendant. :

10 - - - - - x

11
12 Virtual Videotaped Deposition of
13 SHANITA McCALL
14 Tuesday, March 22, 2022
15 8:37 a.m. CST
16
17
18
19
20

21 Job No.: 437058
22 Pages: 1 - 84
23 Reported by: THERESA A. VORKAPIC,
24 CSR, RMR, CRR, RPR
25

Transcript of Shanita McCall
Conducted on March 22, 2022

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Virtual Videotaped deposition of Shanita
McCall taken pursuant to notice before Theresa A.
Vorkapic, a Certified Shorthand Reporter,
Registered Merit Reporter, Certified Realtime
Reporter, Registered Professional Reporter and a
Notary Public in and for the State of Illinois.

Transcript of Shanita McCall
Conducted on March 22, 2022

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

ELIZABETH LITTRELL, ESQUIRE

AARON FLEISHER, ESQUIRE

SOUTHERN POVERTY LAW CENTER

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404-221-5876

and

DIEGO SOTO, ESQUIRE

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ON BEHALF OF THE DEFENDANT:

TERRY LONG, ESQUIRE

SATCHER & MCGOVERN, LLC

288 South Main Street Suite 100

Alpharetta, Georgia 30009

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Transcript of Shanita McCall
Conducted on March 22, 2022

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A P P E A R A N C E S (Continued)
ON BEHALF OF THE DEPONENT:
TINA PIPER, ESQUIRE
GEORGIA OFFICE OF THE ATTORNEY GENERAL
40 Capitol Square, SW
Atlanta, Georgia 30334
404-304-4424

ALSO PRESENT:
Matt Weedon, Audiovisual Technician,
Planet Depos
RJ Buckler, CLVS, Videographer,
Planet Depos

Transcript of Shanita McCall
Conducted on March 22, 2022

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C O N T E N T S

EXAMINATION OF SHANITA McCALL	PAGE
Examination By Mr. Fleisher	7
Examination By Ms. Long	58

E X H I B I T S

(Attached to transcript.)

McCALL DEPOSITION EXHIBITS	PAGE
Exhibit 1 DEF 0577	28
Exhibit 2 DEF 1447 Audio Recording	50
Exhibit 3 DEF 1441 Audio Recording	57

Transcript of Shanita McCall
Conducted on March 22, 2022

6

1	P R O C E E D I N G S	08:37:40
2	THE VIDEOGRAPHER: Here begins recording	08:37:53
3	No. 1 of the videotaped deposition of Shanita	08:38:17
4	McCall, in the matter of Ashley Diamond versus	08:38:23
5	Arneika Smith in the US District Court for the	08:38:26
6	Middle District of Georgia, Macon Division, Case	08:38:29
7	No. 5:20-cv-378-MTT.	08:38:34
8	Today's date is March 22, 2022. The time	08:38:36
9	on the video monitor is 8:38 a.m. Central US time.	08:38:38
10	The videographer today is RJ Buckler, CLVS	08:38:42
11	representing Planet Depos. This video deposition	08:38:47
12	is taking place remotely via Zoom.	08:38:49
13	Would counsel please voice-identify	08:38:51
14	themselves and state whom they represent.	08:38:53
15	MR. FLEISHER: Good morning. Aaron	08:38:56
16	Fleisher with the Southern Poverty Law Center on	08:38:58
17	behalf of plaintiff Ashley Diamond.	08:39:01
18	MS. LITTRELL: Beth Littrell of the	08:39:04
19	Southern Poverty Law Center on behalf of the	08:39:08
20	plaintiff Ashley Diamond.	08:39:11
21	MR. SOTO: Diego Soto of the Southern	08:39:14
22	Poverty Law Center on behalf of Ashley Diamond. I	08:39:17
23	have not entered an appearance, however.	08:39:18
24	MS. PIPER: Tina Piper on behalf of	08:39:25
25	Ms. Shanita McCall.	08:39:28

Transcript of Shanita McCall
Conducted on March 22, 2022

7

1	MS. LONG: Terry Long on behalf of	08:39:30
2	defendant Arneika Smith.	08:39:32
3	THE VIDEOGRAPHER: The court reporter	08:39:36
4	today is Theresa Vorkapic representing Planet	08:39:37
5	Depos.	08:39:41
6	Would the court reporter please swear in	08:39:41
7	the witness.	08:39:43
8	THE REPORTER: Would you raise your right	
9	hand, please.	
10	(The witness was duly sworn.)	
11	SHANITA McCALL,	
12	called as a witness herein, having been first duly	
13	sworn, was examined and testified as follows:	
14	EXAMINATION	08:39:59
15	BY MR. FLEISHER:	08:39:59
16	Q Thank you. Good morning, Ms. McCall. My	08:40:00
17	name is Aaron Fleisher again. I'm with the	08:40:03
18	Southern Poverty Law Center. I represent the	08:40:06
19	plaintiff in this matter Ashley Diamond.	08:40:10
20	I guess, first of all, how do you prefer	08:40:11
21	to be addressed? Do you prefer Ms. McCall or	08:40:13
22	Lieutenant McCall or what would you like me to	08:40:20
23	call you?	08:40:21
24	A I am unit manager at this time, but you	08:40:21
25	can call me Ms. McCall. That's fine.	08:40:24

Transcript of Shanita McCall
Conducted on March 22, 2022

8

1	Q Okay. Thank you. Thank you for being	08:40:27
2	here this morning, Ms. McCall. I know you didn't	08:40:28
3	have a choice, but we appreciate you coming in and	08:40:33
4	taking the time to talk to us.	08:40:35
5	I want to make clear at the outset you are	08:40:36
6	not a defendant in this case. We've asked you to	08:40:38
7	come in because we think you might have some	08:40:40
8	relevant information but you are not a party in	08:40:42
9	this matter.	08:40:44
10	Is that clear to you?	08:40:45
11	A Yes, that's clear to me.	08:40:47
12	Q Great. Can you please state your full	08:40:52
13	name and spell it for the court reporter today.	08:40:54
14	A Shanita, S-h-a-n-i-t-a, McCall,	08:40:56
15	M-c-c-a-l-l.	08:41:06
16	Q Thank you. And I understand Ms. Piper is	08:41:15
17	here representing you today; is that correct?	08:41:16
18	A Yes.	08:41:17
19	Q Thank you. Have you ever been deposed	08:41:18
20	before?	08:41:20
21	A No.	08:41:20
22	Q Have you ever testified in any civil or	08:41:20
23	criminal matter?	08:41:23
24	A No.	08:41:25
25	Q Can I ask where you are testifying from	08:41:30

Transcript of Shanita McCall
Conducted on March 22, 2022

9

1	today?	08:41:32
2	A Central State Prison, my office.	08:41:34
3	Q So you're in your own office?	08:41:38
4	A Yes.	08:41:40
5	Q Is the door closed?	08:41:41
6	A Yes.	08:41:43
7	Q Is there anyone in there with you?	08:41:44
8	A No.	08:41:46
9	Q Okay. If anyone should come in during the	08:41:48
10	deposition, will you please let us know?	08:41:50
11	A I will.	08:41:53
12	Q Thank you. So since you haven't been	08:41:54
13	deposed before, I want to go over a few ground	08:41:58
14	rules.	08:42:01
15	First of all, Theresa, the court reporter,	08:42:01
16	is taking down everything we say so one thing	08:42:03
17	that's really important is that we don't talk over	08:42:05
18	each other. So I will try to let you give your	08:42:08
19	full answers before I ask any questions and I	08:42:11
20	would ask that you allow me to finish asking a	08:42:14
21	question before you answer.	08:42:17
22	Does that make sense?	08:42:18
23	A Yes.	08:42:20
24	Q Great. Thanks. The other thing is that	08:42:22
25	Theresa can't take down sort of nods of the head	08:42:24

Transcript of Shanita McCall
Conducted on March 22, 2022

10

1	or uh-huh, things like that so I'd ask you to	08:42:27
2	please give verbal answers to every question.	08:42:30
3	Is that clear?	08:42:32
4	A Yes.	08:42:33
5	Q If you don't understand a question I ask,	08:42:36
6	will you let me know?	08:42:39
7	A Yes.	08:42:42
8	Q If you go ahead and answer, I will assume	08:42:42
9	that you understood my question; is that clear?	08:42:46
10	A Yes.	08:42:50
11	Q And you understand that you are under oath	08:42:51
12	today?	08:42:53
13	A Yes.	08:42:55
14	Q And the oath is the same one you would	08:42:57
15	give if you were giving testimony in a court of	08:42:59
16	law.	08:43:01
17	Is that clear to you?	08:43:02
18	A Yes.	08:43:03
19	Q Is there any reason you wouldn't be able	08:43:06
20	to give complete and honest answers today?	08:43:07
21	A No.	08:43:11
22	Q Will you agree to keep your camera and	08:43:14
23	your audio on while we are on the record in the	08:43:16
24	deposition?	08:43:19
25	A Yes.	08:43:21

Transcript of Shanita McCall
Conducted on March 22, 2022

11

1	Q Do you understand that the deposition is	08:43:23
2	being recorded?	08:43:25
3	A Yes.	08:43:28
4	Q Do you understand that your testimony	08:43:29
5	could be used in a trial in this case?	08:43:32
6	A Yes.	08:43:36
7	Q I'd ask that while we're on the record in	08:43:40
8	the deposition you don't communicate with anyone	08:43:44
9	else; is that clear?	08:43:46
10	A Yes.	08:43:54
11	Q Thank you. Are you on a computer, tablet?	08:43:56
12	A Mobile device, yes.	08:43:59
13	Q Mobile device, okay.	08:44:00
14	Is there anything else up on the mobile	08:44:01
15	device other than the Zoom program?	08:44:04
16	A No.	08:44:05
17	Q If anything comes up during the	08:44:06
18	deposition, will you let us know?	08:44:08
19	A Yes.	08:44:09
20	Q Thank you.	08:44:15
21	Do you have any other electronic devices	08:44:15
22	with you in the room?	08:44:18
23	A My computer.	08:44:18
24	Q Can I ask that you turn your computer off	08:44:23
25	while we're on deposition so that there's nothing	08:44:25

Transcript of Shanita McCall
Conducted on March 22, 2022

12

1 else to come up and distract you? 08:44:29

2 A I'm turning it off now. 08:44:41

3 Q Do you need a moment? Sorry. Was that a 08:44:43

4 yes or no? 08:44:46

5 A Yes. I'm sorry. 08:44:52

6 Q Just let me know when it's off and you're 08:44:53

7 ready. 08:44:55

8 A It's off. 08:44:56

9 Q Thank you. Sorry, just to be clear you 08:44:57

10 said you're on a mobile device for the deposition. 08:44:59

11 Is that a phone? 08:45:01

12 A Yes. 08:45:02

13 Q Will you turn your phone on do not disturb 08:45:03

14 so that you're not getting text messages or 08:45:06

15 notifications or things that might distract you 08:45:08

16 during the deposition? 08:45:11

17 A It's on do not disturb. 08:45:36

18 Q That was a lot of swiping there. So 08:45:38

19 everything is on do not disturb now? 08:45:38

20 A Yes. 08:45:41

21 Q Thank you very much. If you have any 08:45:41

22 connection issues, hopefully that won't happen, I 08:45:44

23 would ask that you reach out to your attorney 08:45:46

24 Ms. Piper and we can navigate that and figure that 08:45:49

25 out as we go. 08:45:52

Transcript of Shanita McCall
Conducted on March 22, 2022

13

1	Does that make sense?	08:45:54
2	A Yes.	08:45:55
3	Q Great. I'm going to ask you a series of	08:45:55
4	questions. Ms. Piper and Ms. Long may make	08:45:57
5	objections to those questions. Unless you are	08:46:00
6	directed not to answer the question, once their	08:46:02
7	objection is made, you should go ahead and answer	08:46:04
8	the question.	08:46:06
9	Is that clear?	08:46:07
10	A Yes.	08:46:08
11	Q Great. We'll try to take some breaks.	08:46:12
12	I'll try not to go too long without a break so we	08:46:15
13	can use the bathroom and get a snack, but if you	08:46:22
14	need a break at any time, just let me know.	
15	That's not a problem. We can take a break. The	
16	only thing I would ask is that if there's a	
17	question pending, if I've asked you a question,	08:46:25
18	you go ahead and answer it before asking for a	08:46:26
19	break.	08:46:29
20	Does that make sense?	08:46:29
21	A Yes.	08:46:32
22	Q Great. I think that's all I have for sort	08:46:32
23	of preliminary kind of instructions.	08:46:35
24	Do you have any questions before we get	08:46:39
25	started?	08:46:41

Transcript of Shanita McCall
Conducted on March 22, 2022

14

1	A No.	08:46:42
2	Q Okay. Have you brought any documents or	08:46:47
3	notes with you to the deposition?	08:46:51
4	A No.	08:46:52
5	Q How did you prepare for the deposition	08:46:58
6	today?	08:47:00
7	A I spoke with my attorney who gave me --	08:47:01
8	Q Sorry to interrupt. You don't have to	08:47:12
9	tell me anything you spoke with Ms. Piper about.	08:47:14
10	So I want to make that clear. Other than that --	08:47:18
11	A I wasn't going to say anything we spoke	08:47:21
12	about.	08:47:23
13	Q Okay. I'm sorry to interrupt. Go ahead.	08:47:24
14	A I just spoke with my attorney about how	08:47:26
15	the deposition works, and that's it.	08:47:32
16	Q Did you speak with anyone else about the	08:47:35
17	deposition?	08:47:37
18	A No.	08:47:40
19	Q Has anyone at the Georgia Department of	08:47:40
20	Corrections, GDC, talked to you about the	08:47:44
21	deposition, again, other than Ms. Piper?	08:47:46
22	A No.	08:47:49
23	Q Do you have any concern about speaking on	08:47:52
24	the record today?	08:47:54
25	A None.	08:47:55

Transcript of Shanita McCall
Conducted on March 22, 2022

15

1 Q Can you tell me your educational 08:47:57
2 background, Ms. McCall? 08:47:59
3 A I have a Masters in social work, cognitive 08:48:05
4 behavior therapies. I also have a Bachelors in 08:48:09
5 social work with a special focus in mental health 08:48:17
6 and have an associates in social work. 08:48:19
7 Q Where did you get those degrees? 08:48:22
8 A My associates I got from Georgia military 08:48:24
9 college and both my Bachelors and Masters I got 08:48:27
10 from Brescia University out of Owensboro,
11 Kentucky. 08:48:45
12 Q When did you obtain those degrees? 08:48:45
13 A My Bachelors -- my Associates was in 2015, 08:48:48
14 my Masters was in '18, and my -- I mean my 08:49:00
15 Bachelors was in '18 and my Masters was in '20, I 08:49:05
16 believe, May of '20. 08:49:10
17 Q Thank you. Can you go through your 08:49:11
18 employment history with us, please. 08:49:14
19 A Uh-huh. I was employed with GDC 08:49:15
20 December of 2008 -- no, 2007, I'm sorry, and I've 08:49:22
21 been with the department since then. 08:49:32
22 Q GDC again is the Georgia Department of 08:49:34
23 Corrections? 08:49:38
24 A That's correct. 08:49:38
25 Q Before you worked with GDC starting 2007, 08:49:40

Transcript of Shanita McCall
Conducted on March 22, 2022

16

1 did you work elsewhere? 08:49:44

2 A Yes. I did briefly work with Coastal 08:49:47

3 Plain Head Start. 08:49:57

4 Q What is that? 08:49:59

5 A It's a preschool? 08:50:00

6 Q So since 2007 you've been with GDC? 08:50:07

7 A Yes. 08:50:11

8 Q Okay. And what positions have you held 08:50:11

9 from 2007 to the present? 08:50:13

10 A I was a cadet, a Correctional Officer I, 08:50:15

11 Correctional Officer II, sergeant, lieutenant and 08:50:19

12 I currently am a unit manager. 08:50:23

13 Q When did you become unit manager? 08:50:26

14 A In August of last year. 08:50:31

15 Q Congratulations. 08:50:36

16 A Thank you. 08:50:37

17 Q What does that mean to be a unit manager? 08:50:38

18 A I am the -- I would be considered 08:50:53

19 administration, like a liaison between the 08:50:56

20 security staff, the offenders and the 08:51:00

21 administration. 08:51:02

22 Q I assume that was a promotion from 08:51:05

23 lieutenant; is that right? 08:51:08

24 A That's correct. 08:51:10

25 Q What facilities have you worked at since 08:51:11

Transcript of Shanita McCall
Conducted on March 22, 2022

17

1	you began with GDC?	08:51:14
2	A From cadet to sergeant, I was at Valdosta	08:51:18
3	State Prison from 2007 to 2018, and then '19 I was	08:51:23
4	promoted to lieutenant at GDCP, which is Georgia	08:51:29
5	Diagnostics and Classification Prison, and I	08:51:38
6	stayed there until August of last year where I was	08:51:40
7	promoted from there to Macon which is Central	08:51:43
8	State Prison as a unit manager where I currently	08:51:48
9	am.	08:51:51
10	Q So I just want to make clear, from 2019 to	08:51:52
11	August of 2021 you were at GDCP?	08:51:56
12	A Yes.	08:52:00
13	Q And you were a lieutenant at that time?	08:52:01
14	A That's correct.	08:52:07
15	Q What are the responsibilities of a	08:52:09
16	lieutenant?	08:52:11
17	A The lieutenant pretty much controls or	08:52:11
18	enforces the day-to-day routine of the facility,	08:52:14
19	ensure that the day-to-day operations are taken	08:52:18
20	care of such as offender management, making sure	08:52:21
21	that the offenders get to programming that they're	08:52:27
22	supposed to go to, and any security issues that	08:52:30
23	come up, it is my job -- it was my job as a	08:52:32
24	lieutenant to ensure that the proper people were	08:52:36
25	notified and that we followed the steps within the	08:52:41

Transcript of Shanita McCall
Conducted on March 22, 2022

18

1 policies for whichever condition comes up. 08:52:44

2 Q So, again, focusing on the time you were 08:52:51

3 at GDCP as a lieutenant, who did you report to? 08:52:54

4 A I had different people that I reported to 08:52:59

5 as a lieutenant depending on which shift I was 08:53:02

6 with. When I worked on night shift, I reported to 08:53:05

7 Mr. Kurt (inaudible), which he was also a 08:53:08

8 lieutenant but he was the lead lieutenant on that 08:53:11

9 shift. He was OIC for that shift. When I went to 08:53:15

10 first shift, I reported to Ms. Lawson who is no 08:53:17

11 longer at GDCP. When I switched another shift I 08:53:22

12 was under, Captain Birch. So it just depends on 08:53:30

13 who I was under at that time. I just reported to

14 the rank above me. 08:53:39

15 Q You used the term OIC I think. What does 08:53:39

16 that term mean? 08:53:41

17 A It's the officer in charge. I'm sorry. 08:53:42

18 Q It's okay. You don't have to apologize. 08:53:43

19 It's my job to make sure we're getting clear what 08:53:46

20 these terms mean. 08:53:50

21 During that time who reported to you or 08:53:52

22 who did you supervise? 08:53:54

23 A I supported -- I supervised any sergeants 08:53:55

24 and officers under me, and the offenders. 08:53:59

25 Q On any given shift, how many sergeants and 08:54:11

Transcript of Shanita McCall
Conducted on March 22, 2022

19

1 officers would there be? 08:54:14

2 A Well, initially it was usually two or 08:54:15

3 three sergeants and -- two, three, sometimes four 08:54:17

4 sergeants and maybe 15, 20 officers so it depends 08:54:22

5 on the number of shifts -- the number of officers 08:54:29

6 and sergeants assigned to that shift. 08:54:35

7 Q Did you have a regular shift at that time? 08:54:42

8 A At which time? 08:54:43

9 Q Sorry. During the time you were a 08:54:44

10 lieutenant at GDCP. 08:54:46

11 A Yes, I had several shifts. I moved shifts 08:54:48

12 often depending on if it was time to rotate the 08:54:51

13 staff so if there was an need for me to switch 08:54:55

14 shifts due to any other reason like when it's time 08:54:59

15 to -- whenever the major decides to switch the 08:55:05

16 shifts around so.. 08:55:08

17 Q I see. Ms. McCall, do you know who Ashley 08:55:10

18 Diamond? 08:55:17

19 A I'm familiar who she is, Ashley Diamond 08:55:17

20 is, but on a personal level, no. 08:55:28

21 Q You said you are familiar with her. How 08:55:34

22 are you familiar with her? 08:55:35

23 A I know that Ashley Diamond was an offender 08:55:36

24 at GDCP when I was there so that's -- 08:55:41

25 Q Do you remember -- I'm sorry. Go ahead. 08:55:49

Transcript of Shanita McCall
Conducted on March 22, 2022

20

1 A That's about the extent that I know who 08:55:52
2 Ashley Diamond is. 08:55:55
3 Q Do you remember when you first met her? 08:55:56
4 A No, not really. 08:56:08
5 Q Did you hear anything about her before you 08:56:11
6 first met her? 08:56:13
7 A Yes, yes. 08:56:25
8 Q What did you hear? 08:56:26
9 A The first time I had heard anything about 08:56:29
10 Ashley Diamond, I wasn't even at Jackson so.. 08:56:33
11 Q Where were you? 08:56:40
12 A I was at Valdosta State Prison. 08:56:41
13 Q What did you hear? 08:56:48
14 A That Diamond did a lot of -- I guess a lot 08:56:49
15 of advocating for the transgender community. 08:57:04
16 (Reporter clarification). 08:57:29
17 Q Ms. McCall, you said you heard that 08:57:30
18 Ms. Diamond did a lot of advocating for the 08:57:36
19 transgender community. 08:57:41
20 Who did you hear that from? 08:57:42
21 A I don't remember. It's been many years 08:57:43
22 ago. 08:57:45
23 Q Do you remember if it was from staff or 08:57:45
24 other offenders? 08:57:48
25 A I believe -- no, I believe it was during 08:57:49

Transcript of Shanita McCall
Conducted on March 22, 2022

21

1 one of the training -- it was during the time 08:57:51
2 where we were going into acknowledging transgender 08:58:01
3 on a bigger level, on a bigger level where we as 08:58:06
4 the department had to identify the offender as 08:58:14
5 whichever gender they identify with, so it was 08:58:17
6 years ago. I don't remember who or when it was. 08:58:26
7 I just remember her, Diamond, being brought up in 08:58:31
8 the mix along with the training of the staff to 08:58:39
9 acknowledge transgender as female or male, 08:58:47
10 whichever they prefer, adjective they prefer. 08:58:51
11 Q Do you remember the last -- I'm sorry. Go 08:58:57
12 ahead. 08:59:00
13 A I said or pronoun, whichever one they 08:59:03
14 prefer. 08:59:06
15 Q Got it. Thank you. Do you remember the 08:59:07
16 last time you had any contact with Ashley Diamond? 08:59:10
17 A No. 08:59:17
18 Q While you were a lieutenant at GDCP, how 08:59:23
19 frequently would you have contact with 08:59:29
20 Ms. Diamond? 08:59:31
21 A If at all, once maybe in the hallway, hey, 08:59:46
22 how are you doing, but that's the extent. Like, I 08:59:54
23 don't remember having any conversation with 08:59:57
24 Offender Diamond. I don't remember any 09:00:01
25 conversation that Diamond and I exchanged. 09:00:10

Transcript of Shanita McCall
Conducted on March 22, 2022

22

1	Q Did she ever express any concerns to you	09:00:18
2	about her safety?	09:00:20
3	A Not to me, no. Not that I can remember,	09:00:26
4	no.	09:00:39
5	Q How would you define Ms. Diamond's gender	09:00:39
6	expression?	09:00:45
7	A I am aware that she identifies as	09:00:50
8	transgender; so that's all the explanation that I	09:00:52
9	can give.	09:01:01
10	Q Were you aware of Ms. Diamond's history of	09:01:09
11	sexual assault?	09:01:15
12	MS. PIPER: I object to the form.	09:01:17
13	BY THE WITNESS:	09:01:20
14	A Did somebody say something? I'm sorry.	09:01:21
15	MS. PIPER: I objected, but you can go	09:01:23
16	ahead and answer.	09:01:24
17	BY THE WITNESS:	09:01:27
18	A Okay. Personally, no. Diamond had never	09:01:28
19	reported any sexual assault to me.	09:01:37
20	BY MR. FLEISHER:	09:01:40
21	Q Had you heard anything about it?	09:01:40
22	A Heard anything from who?	09:01:46
23	Q From anyone?	09:01:48
24	A Which time frame? Like while I --	09:01:49
25	Q At any time.	09:01:52

Transcript of Shanita McCall
Conducted on March 22, 2022

23

1 A I may have. I have think I heard of an 09:01:56
2 accusation, but I don't -- I'm not -- I wasn't 09:02:01
3 there to take any testimony or hear anything that 09:02:05
4 happened during the incident so.. 09:02:12
5 Q Sure. What was the accusation you heard 09:02:17
6 about? 09:02:19
7 A That she had been assaulted by Arneika 09:02:30
8 Smith. 09:02:36
9 Q When you say she, just to be clear, you're 09:02:37
10 referring to Ashley Diamond? 09:02:40
11 A Yes. 09:02:41
12 Q Do you remember when that was? 09:02:46
13 A Not right off my head, no, I don't 09:02:51
14 remember. 09:02:53
15 Q Who did you hear this from? 09:02:54
16 A The PREA coordinator had asked me had I 09:03:08
17 heard anything or had any report been given to me 09:03:15
18 about an assault between Offender Diamond and 09:03:18
19 Officer Smith. I told her no. 09:03:25
20 Q For the benefit of the court reporter, you 09:03:28
21 said PREA coordinator, that's P-R-E-A; is that 09:03:32
22 right? 09:03:37
23 A PREA, yes, Prison Rape Elimination Act, 09:03:38
24 our first point of contact. Yes. 09:03:45
25 Q Who was the PREA coordinator? 09:03:46

Transcript of Shanita McCall
Conducted on March 22, 2022

24

1 A Ms. Smith, Lachisa Smith. 09:03:49

2 Q You mentioned Arneika Smith. Who was 09:03:53

3 that? 09:03:56

4 A That at the time was an officer at Georgia 09:03:56

5 Diagnostic. 09:04:10

6 Q This was when you were a lawsuit 09:04:10

7 lieutenant there; is that correct? 09:04:13

8 A That's correct. 09:04:13

9 Q I apologize that you can hear my dog 09:04:15

10 barking in the background. Unfortunately there's 09:04:20

11 not much I can do about that, but hopefully 09:04:21

12 whatever is causing her to bark will move on soon. 09:04:23

13 So Ms. Smith, I'm sorry, you said was a 09:04:26

14 correctional officer; is that right? 09:04:30

15 A That's correct. 09:04:31

16 Q Do you know when she began working at GDC? 09:04:31

17 A Not right off my head, no. I don't. 09:04:34

18 Q Was she -- what was your relationship with 09:04:41

19 Ms. Smith, in terms of supervisor, supervisee, 09:04:42

20 that kind of thing? 09:04:48

21 A I was her lieutenant. 09:04:49

22 Q So you supervised her? 09:04:50

23 A I did. So with the chain of command there 09:04:51

24 is a sergeant that's directly above her and then 09:04:54

25 I'm above the sergeant. So everything under the 09:04:56

Transcript of Shanita McCall
Conducted on March 22, 2022

25

1 sergeant I supervise, but her immediate supervisor 09:04:58
2 was the sergeant. 09:05:04

3 Q So what does that entail being a 09:05:10
4 supervisor of an officer like that? What do you 09:05:12
5 do to supervise them? 09:05:14

6 A On a lieutenant level or a sergeant level? 09:05:15

7 Q Sorry. On your level, lieutenant level. 09:05:18

8 A As a lieutenant, it was my job to make 09:05:21
9 sure that my sergeants were trained enough to 09:05:23
10 train the officers which made sure that the count 09:05:28
11 procedure was taken -- the count -- the offender 09:05:35
12 accountability was up to date, to make sure that 09:05:37
13 the officers were aware of policies and trainings 09:05:39
14 were up to date, make sure that the day-to-day 09:05:44
15 operations of the facility took place and was on 09:05:46
16 time, on a schedule as well as officer discipline, 09:05:49
17 offender discipline. And it was also my duty as a 09:05:55
18 lieutenant to inform my supervisors of any breach 09:06:00
19 of security or breach of -- or if anything was out 09:06:03
20 of the ordinary. So to kind of keep to 09:06:07
21 effectively run of a secure facility really. 09:06:13

22 Q I see. How often during the time were you 09:06:21
23 a lieutenant at GDCP did you interact with Officer 09:06:24
24 Arneika Smith? 09:06:30

25 A When she was there it was daily because 09:06:30

Transcript of Shanita McCall
Conducted on March 22, 2022

26

1 each day before we would do shift assignment we 09:06:36
2 have what's called briefing. So each officer is 09:06:39
3 usually in that briefing, give out any pertinent 09:06:41
4 information or any situations or give the out any 09:06:44
5 information that is for that officer -- that the 09:06:46
6 officer needs to take forward with them before 09:06:49
7 they go on post. 09:06:51

8 Q Other than the briefings, did you have any 09:06:52
9 interactions with Officer Arneika Smith? 09:06:57

10 A Yes. Throughout the day, every 09:07:02
11 lieutenant, we would -- any lieutenant we would 09:07:04
12 have to go inside on each different post and 09:07:06
13 sometimes she was in the area where I typically 09:07:09
14 signed off at or where I was present due to as a 09:07:12
15 lieutenant we had to show face in different areas 09:07:18
16 of the prison at different times just to make sure 09:07:22
17 that the offenders and the officer knew that we 09:07:25
18 were there. 09:07:28

19 Q So would you say you interacted with her 09:07:34
20 daily, weekly, multiple times a week? Can you 09:07:37
21 give, you know, a sort of ball park? 09:07:40

22 A It would be multiple times a week because 09:07:42
23 the way our schedules are we don't work daily. We 09:07:46
24 work rotations so any workday that she worked and 09:07:49
25 I worked I interacted. 09:07:54

Transcript of Shanita McCall
Conducted on March 22, 2022

27

1 Q What did you think of Officer Arneika 09:07:59
2 Smith? 09:08:06

3 A She was an officer that needed training so 09:08:06
4 I didn't -- I try not to think beyond their 09:08:12
5 actions honestly so.. 09:08:17

6 Q What do you mean when you say she was an 09:08:19
7 officer that needed training? 09:08:22

8 A Yes, so what I mean is if any time an 09:08:23
9 officer comes into the department, I try not to 09:08:25
10 give them an unfair advantage or disadvantage. So 09:08:32
11 I just ensure that they know what is expected. 09:08:35
12 So I don't really think anything particularly of 09:08:40
13 her. 09:08:46

14 Q Did you ever have to discipline her? 09:08:47

15 A I have. 09:08:50

16 Q For what reason? 09:08:52

17 A I don't remember all reasons, but I do 09:08:56
18 know of being tardy was one. I would have to look 09:08:59
19 at her file to see, you know, what the discipline 09:09:12
20 actions were for so, but I know I have had to use 09:09:17
21 discipline before. 09:09:21

22 Q If you saw her record, might that help you 09:09:24
23 remember? 09:09:26

24 A I'm sure. 09:09:27

25 MR. FLEISHER: Matt, could we pull up, 09:09:30

Transcript of Shanita McCall
Conducted on March 22, 2022

28

1	let's see, DEF 0577, please.	09:09:37
2	BY MR. FLEISHER:	09:09:39
3	Q Ms. McCall, just so you understand, I'm	09:09:41
4	asking the tech to pull up something we're going	09:09:44
5	to ask you to take a look at, a document.	09:09:47
6	A Okay.	09:09:50
7	(A certain document was marked McCall	09:09:50
8	Deposition Exhibit 1 for identification,	
9	as of 03/22/2022.)	09:09:56
10	AV TECH WEEDON: Counsel, would you like	09:09:56
11	this marked as McCall Exhibit 1?	09:09:58
12	MR. FLEISHER: Please. Thank you.	09:10:00
13	BY MR. FLEISHER:	09:10:19
14	Q Ms. McCall, can you see that on your	09:10:20
15	screen? I can see it but it's never clear to me	09:10:22
16	what other people can see.	09:10:25
17	A Okay. I can blow it up from my end so	09:10:27
18	yes, I can see it.	09:10:30
19	Q Do you recognize this document?	09:10:31
20	A I do recognize the document.	09:10:39
21	Q I'm sorry. Let me give you a minute to	09:10:41
22	look over -- let me know when you've had a chance	09:10:44
23	to look over it and I'll ask some questions.	09:10:46
24	A Yes.	09:10:58
25	Q What is that document?	09:10:59

Transcript of Shanita McCall
Conducted on March 22, 2022

29

1 A This is a letter of concern. It is one of 09:11:00
2 the first steps in an officer discipline when a -- 09:11:05
3 this usually takes place after an officer has been 09:11:11
4 given verbal instruction on how to do something or 09:11:13
5 a policy that maybe they breached, and this is 09:11:16
6 just a written form of acknowledgment so that -- 09:11:21
7 before any steps is taken in the disciplinary 09:11:32
8 process, they have received a letter of concern. 09:11:35
9 Q Who wrote this letter of concern? 09:11:40
10 A According -- Ms. Shanita McCall, me, 09:11:46
11 lieutenant at the time. 09:11:51
12 Q Who were you directing it to? 09:11:52
13 A Arneika Smith. 09:11:54
14 Q Thanks. This has been marked as McCall 09:12:03
15 Exhibit 1; is that right? Sorry. I'm not asking 09:12:07
16 you, Ms. McCall. I'm just making sure -- 09:12:10
17 AV TECH WEEDON: That's right, Counsel. 09:12:13
18 MR. FLEISHER: Thank you. We can go ahead 09:12:15
19 and take that down. 09:12:18
20 BY MR. FLEISHER: 09:12:18
21 Q Ms. McCall, disciplining Officer Arneika 09:12:20
22 Smith? 09:12:27
23 A Well, I do recall this incident. This 09:12:27
24 was -- I do recall this incident. It was due to 09:12:38
25 improper post exchange and what I mean by post 09:12:39

Transcript of Shanita McCall
Conducted on March 22, 2022

30

1 exchange is where one officer is relieved by the 09:12:42
2 oncoming officer, there are steps that should -- 09:12:45
3 that are supposed to be taken in order to do a 09:12:49
4 proper post exchange where the officer is relieved 09:12:52
5 of duty and the next is officer takes over. And 09:12:55
6 according to this one, Arneika Smith did not 09:12:58
7 follow protocol with the sergeant that was 09:13:02
8 relieving her. 09:13:04

9 Q Do you remember what happened? 09:13:06

10 A If my memory serves me correct that inside 09:13:14
11 of the medical unit, there are door sheets that 09:13:18
12 have a specific amount of time that you have to 09:13:23
13 check on the offenders inside of those cells, and 09:13:25
14 I believe Officer Smith was making the physical 09:13:35
15 rounds but not documenting. So before you can go, 09:13:38
16 your paperwork has to be correct before the 09:13:45
17 officer relieves you or there needs to be notation 09:13:49
18 as to why they were not correct. Then she was 09:13:53
19 given instruction by the sergeant to correct it so 09:13:57
20 that they could do a proper post change, and she 09:14:01
21 did not. 09:14:04

22 Q I see. Do you know what happened after 09:14:09
23 this, after you issued this letter? 09:14:12

24 A I assume she got it together. If that's 09:14:18
25 the only one, then I'm assuming that she did use 09:14:21

Transcript of Shanita McCall
Conducted on March 22, 2022

31

1 it as a learning tool and began to do proper post 09:14:24
2 exchanges. 09:14:26

3 Q Before I just want to confirm, I believe 09:14:28
4 you said you recalled disciplining Officer Smith 09:14:31
5 for being tardy; is that right? 09:14:35

6 A Yes. The word that came to mind, any time 09:14:38
7 an officer is tardy or late for three consecutive 09:14:53
8 or three times in a cycle then we give a letter of 09:14:59
9 concern, instead of me verbally telling you, hey, 09:15:03
10 you're late, a letter of concern is a written 09:15:06
11 account that you've been late three times this 09:15:11
12 cycle and you can be -- if this continues, we'll 09:15:14
13 just go up the chain -- down the chain of 09:15:18
14 offender -- I'm sorry, officer discipline, sorry. 09:15:23
15 We'll continue with the step of officer 09:15:27
16 discipline. 09:15:31

17 Q Just to be clear, that was different from 09:15:34
18 the incident that led to the letter we just looked 09:15:36
19 at Exhibit 1; is that right? 09:15:39

20 A That's correct. 09:15:40

21 Q Did you ever talk about Officer Arneika 09:15:48
22 Smith with other officers? 09:15:49

23 A Officers, no. 09:15:59

24 Q Did you ever talk about her with anyone? 09:16:00

25 A When you say "talk about," you mean 09:16:05

Transcript of Shanita McCall
Conducted on March 22, 2022

32

1 discuss anything referring to her? 09:16:08

2 Q Yes. 09:16:12

3 A Yes. With the lieutenant or the captain 09:16:13

4 that I was with, we talked about all the officers 09:16:19

5 and ways we can either improve or ways that we 09:16:24

6 need to see if we can help the officer who may be 09:16:26

7 having an issue. So we talked about all the 09:16:33

8 officers, not just her. 09:16:35

9 Q Sure. So when you had those conversations 09:16:38

10 with the lieutenant or whoever about Officer 09:16:41

11 Smith, what was said? 09:16:45

12 A I do remember us speaking about her -- she 09:16:54

13 was having a transportation issue; and that was 09:17:01

14 related to the tardy situation. I remember 09:17:06

15 speaking with -- speaking just in general with the 09:17:09

16 supervisors on how we can help her get to work 09:17:13

17 because it was affecting her being able to work 09:17:17

18 and being at work on time. 09:17:21

19 Q Did you ever talk about how she interacted 09:17:31

20 with offenders? 09:17:33

21 A I got a report from an officer and I spoke 09:17:51

22 with my supervisor about it, and that was probably 09:17:54

23 it. 09:18:01

24 Q What was that report? 09:18:01

25 A That one of the officers where we were 09:18:06

Transcript of Shanita McCall
Conducted on March 22, 2022

33

1 doing the shift change when we were trying relieve 09:18:23
2 her -- we were either relieving her -- he was 09:18:30
3 going to relieve her, couldn't find her and he was 09:18:33
4 radioing to tell me he couldn't find her to 09:18:40
5 relieve her and then he radioed back and said she 09:18:43
6 had came out of the closet, and an offender came 09:18:47
7 out of the closet. 09:18:56

8 So I called at the time my major to inform 09:18:57
9 him because I was OIC at the time -- I was over 09:19:01
10 the shift at the time so I was doing shift 09:19:13
11 assignments, I was taking care of the different 09:19:15
12 roles that I had to do as a lieutenant. So I 09:19:21
13 called my supervisor to inform him of the 09:19:24
14 situation so that he could handle -- so that he 09:19:28
15 would be aware. 09:19:35

16 Q Who was the officer -- I think you said an 09:19:38
17 officer reported this to you. 09:19:39

18 Did I get that right? 09:19:41

19 A Yes. In the initial report to me he 09:19:42
20 didn't say -- he just said -- well, he just called 09:19:49
21 me on the phone in the building to let me know 09:19:54
22 that he was relieving her and that's why it took 09:19:56
23 so long. 09:19:58

24 Q Who was that officer? 09:20:01

25 A Officer Ridley. I don't think he's with 09:20:02

Transcript of Shanita McCall
Conducted on March 22, 2022

34

1 the state anymore. 09:20:06

2 Q Do you recall when this was? 09:20:09

3 A I don't recall, but I -- I don't recall. 09:20:12

4 I don't recall when the incident was with, but I 09:20:16

5 know he did a statement about this situation so it 09:20:18

6 was on -- 09:20:24

7 Q Who was the offender that you mentioned in 09:20:25

8 this incident? 09:20:27

9 A I wasn't informed who the offender was at 09:20:29

10 the time. I didn't know who the offender was. 09:20:35

11 Q Do you know now who it was? 09:20:37

12 A I'm assuming it was Offender Diamond. 09:20:39

13 Q Why are you assuming that? 09:20:47

14 A Because I was asked later about Ms. Smith 09:20:47

15 had I knew anything about an offender being in the 09:20:52

16 closet with the officer and I said I heard it but 09:20:58

17 I wasn't -- I got it secondhand and I didn't know 09:21:00

18 anything else further about it and she said -- she 09:21:03

19 initially asked me had I heard anything about -- 09:21:09

20 had I spoke with Offender Diamond about any PREA 09:21:12

21 incidents and I said no so I just -- 09:21:14

22 Q Just to be clear because I think there are 09:21:22

23 several Officer Smiths, you said you were asked by 09:21:24

24 Officer Smith? Which Officer Smith? 09:21:28

25 A By Unit Manager Smith, I'm sorry, the PREA 09:21:29

Transcript of Shanita McCall
Conducted on March 22, 2022

35

1	coordinator.	09:21:34
2	Q What is her first name?	09:21:34
3	A Lachisa Smith.	09:21:37
4	Q I just want to be clear because I know	09:21:40
5	we're also talking about Arneika Smith so this	09:21:43
6	could get a little confusing.	09:21:46
7	So you said the officer who reported this	09:21:47
8	to you was Officer Ridley; is that right?	09:21:52
9	A Yes.	09:21:54
10	Q What did he tell you exactly?	09:21:55
11	A I don't remember the exact words. I just	09:22:09
12	remember the gist of what he was saying.	09:22:11
13	Q What was that?	09:22:13
14	A That he couldn't -- he was relieving	09:22:15
15	Officer Smith, he couldn't find her and then he	09:22:18
16	found her coming out of the closet. That he found	09:22:20
17	her, she was locked in the closet is what he said.	09:22:28
18	I said okay. That's why it took him so long. I	09:22:32
19	said okay.	09:22:34
20	Q Did he tell you how long it took him to	09:22:39
21	find Officer Smith?	09:22:42
22	A No. He didn't tell had me how long it	09:22:48
23	took and I can't honestly say how long it took	09:22:50
24	because I wasn't paying attention to the time and	09:22:53
25	it wasn't like -- I'm not saying it wasn't a	09:22:56

Transcript of Shanita McCall
Conducted on March 22, 2022

36

1 priority, but once I give post assignments and the 09:22:59
2 officers go, I continue on with the lieutenant 09:23:03
3 duties and if there is an issue, then they report 09:23:07
4 it to me if that makes sense. 09:23:10

5 Q I see. Did you believe Officer Ridley? 09:23:15

6 A I had no reason to doubt his word, no. 09:23:18

7 Q Did you speak with, I want to be clear, 09:23:29
8 Officer Arneika Smith about this incident? 09:23:31

9 A I did. 09:23:37

10 Q When was that? 09:23:38

11 A Later that day. It was either later that 09:23:46
12 day or that next day in reference to what took 09:23:48
13 place. 09:23:53

14 Q What was said in that conversation? 09:23:53

15 A She said during that conversation that she 09:23:56
16 had locked -- first she said -- Diamond, I don't 09:24:06
17 want to say he or she and be incorrect, so I'm 09:24:11
18 just going to say Diamond, was helping her look 09:24:14
19 for a jacket in the officer's closet and then she 09:24:17
20 went -- that was the initial conversation, and 09:24:29
21 then she said while they were in there that they 09:24:31
22 just were talking and looking for her jacket. 09:24:35

23 Q Did you believe Officer Arneika Smith? 09:24:42

24 A I don't know if I necessarily believed her 09:24:51
25 answer entirely in its entirety so it was one of 09:24:55

Transcript of Shanita McCall
Conducted on March 22, 2022

37

1 those situations where I didn't put any belief or 09:25:02
2 disbelief. It was at that point a teachable 09:25:05
3 moment to explain to her how unsafe it was and why 09:25:09
4 she shouldn't -- it was a breach of security 09:25:16
5 really so.. 09:25:19
6 Q Why was it unsafe or a breach in security? 09:25:22
7 A Because at no time should an officer and 09:25:27
8 an offender be locked away in an office without 09:25:30
9 just cause, if there is a reason it should be a 09:25:38
10 just reason and not looking for a jacket locked it 09:25:46
11 in a closet because it's unsafe. 09:25:48
12 Q Was that something you'd ever experienced 09:25:53
13 before, an officer an offender being locked in a 09:25:55
14 closet or office together? 09:25:59
15 A No. 09:26:09
16 Q Have you ever experienced it since then? 09:26:10
17 A No. 09:26:11
18 Q Is it against policy? 09:26:16
19 A In this instance, yes. 09:26:19
20 Q You said Officer Arneika Smith said she 09:26:29
21 was looking for her jacket; is that right? 09:26:32
22 A Yes were. 09:26:34
23 Q Did that seem believable to you? 09:26:39
24 A Not particularly, no. 09:26:48
25 Q Do you know if there was an investigation 09:26:54

Transcript of Shanita McCall
Conducted on March 22, 2022

38

1 into this incident? 09:26:56

2 A I believe -- I'm not sure, but I know that 09:26:57

3 whenever Ms. Smith is given -- Ms. Smith being 09:27:04

4 Lachisa Smith -- a PREA allegation, she's pretty 09:27:12

5 thorough. So the reason with her asking me, I'm 09:27:17

6 sure there was an investigation done from her I 09:27:20

7 would assume because she usually does so.. 09:27:21

8 Q Were you ever interviewed as part of any 09:27:37

9 investigation? 09:27:40

10 A Ms. Smith did ask me, Ms. Smith being 09:27:41

11 Lachisa Smith, did ask me if I was aware or if it 09:27:47

12 had been reported to me which the answer was no at 09:27:50

13 the time and that was the gist of me being 09:27:51

14 interviewed about it. 09:27:53

15 Q I appreciate you clarifying which 09:27:53

16 Ms. Smith. I know this is confusing. You spoke 09:27:56

17 with Lachisa -- is that how you say it? 09:28:00

18 A Lachisa.

19 Q Lachisa Smith about this. 09:28:07

20 Did you speak with anyone else about this 09:28:08

21 incident? 09:28:10

22 A In reference to an investigation? 09:28:11

23 Q No, at all. 09:28:16

24 A Yes, I will reported it to my supervisor 09:28:21

25 which was the major. 09:28:24

Transcript of Shanita McCall
Conducted on March 22, 2022

39

1 Q Did do you remember the major's name? 09:28:26

2 A Marc Agbaosi. 09:28:28

3 (Reporter clarification.) 09:28:53

4 Q What did you and the major say? 09:28:53

5 A I just informed him that -- when the 09:28:56

6 incident was happening, I just informed him for 09:29:01

7 him to go check it out and see if there was any 09:29:06

8 merit to it or if there was anything further that 09:29:08

9 I needed to do because the officer did tell me 09:29:12

10 that she was locked in the closet. 09:29:14

11 Q Do you know if he checked it out? 09:29:17

12 A I believe -- I would assume he did. 09:29:21

13 Q Do you know for sure? 09:29:27

14 A I don't remember. I don't remember the 09:29:32

15 incident. Was there an incident had report done 09:29:35

16 with it? That would tell me. Like, I don't 09:29:38

17 remember. 09:29:40

18 Q Were you instructed to do anything else? 09:29:43

19 A I don't remember if I was instructed to do 09:29:55

20 anything else. That's why I asked if there was an 09:29:57

21 incident report done or any paperwork that I have 09:30:00

22 done because I don't remember. 09:30:03

23 Q Did you ever speak with Ashley Diamond 09:30:07

24 about this incident? 09:30:09

25 A No. 09:30:11

Transcript of Shanita McCall
Conducted on March 22, 2022

40

1 Q After the initial report from Officer 09:30:13
2 Ridley, did you ever speak further with Officer 09:30:16
3 Ridley about the incident? 09:30:18

4 A Yes. He wrote the witness statement and 09:30:22
5 turned it into the major and I asked him I don't 09:30:31
6 know if it was that day or that morning what 09:30:37
7 happened, where was he, where was -- what office 09:30:43
8 or where was she locked in because there are 09:30:46
9 several places inside there, well, not several 09:30:49
10 places but there are two, there is a closet and 09:30:52
11 then there's an officer's closet so I wasn't sure 09:30:56
12 where she was locked in. So I asked him and he 09:30:59
13 told me. 09:31:01

14 Q What did he tell you? 09:31:03

15 A That she was inside the officer's closet. 09:31:08

16 Q Did you have any further conversation with 09:31:11
17 Mr. Ridley about it? 09:31:13

18 A No, not after the initial conversation, 09:31:19
19 no, we didn't talk about it. I just told him to 09:31:21
20 write a statement and give it to the major because 09:31:24
21 at the point where I give it to my major, it's 09:31:27
22 kind of -- if he needs something further from me, 09:31:30
23 he'll let me know. 09:31:33

24 Q So after that point, did you have any 09:31:35
25 further conversation with Mr. Ridley about this 09:31:38

Transcript of Shanita McCall
Conducted on March 22, 2022

41

1	incident?	09:31:40
2	A No.	09:31:40
3	Q This officer's closet you mentioned, can	09:31:43
4	you tell us a little about it, where it is, what	09:31:46
5	it looks like?	09:31:48
6	A The officer's closet, it's kind of like a	09:31:51
7	bathroom. Like a -- it has a toilet, it has a	09:32:01
8	sink, it also has a place on the wall where	09:32:07
9	officer's can hang their coats or they can put	09:32:09
10	like paperwork that they need or batteries for the	09:32:12
11	radio chargers. So it's not a really big space,	09:32:16
12	but it's not tiny.	09:32:21
13	Q Do offenders ever go into that officer's	09:32:27
14	closet or should they I should say?	09:32:39
15	A No.	09:32:41
16	Q Had you ever heard of an offender being in	09:32:46
17	that officer's closet other than this one	09:32:47
18	incident?	09:32:49
19	A No.	09:32:50
20	Q Can you think of any reason why an	09:32:51
21	officer -- can you think of any instance in which	09:32:55
22	it would be acceptable for an officer to bring an	09:33:00
23	offender into that closet?	09:33:02
24	A No. No, not without permission, no, I	09:33:07
25	can't.	09:33:15

Transcript of Shanita McCall
Conducted on March 22, 2022

42

1 Q Is that closet -- it has a door I assume? 09:33:18

2 A Yes. 09:33:24

3 Q And does the door lock? 09:33:25

4 A Yes. 09:33:27

5 Q Can you see through the door at all? Is 09:33:31

6 there any window in the door? 09:33:36

7 A No. 09:33:37

8 Q Is the closet checked regularly? 09:33:42

9 A Yes. 09:33:46

10 Q By whom? 09:33:52

11 A It's used by each shift and that's where 09:33:53

12 they go to do like the key checks or equipment 09:33:56

13 checks. So before I can relieve you or before you 09:34:02

14 can relieve me, you have to go in the office to 09:34:06

15 make sure your keys are there, you have to go in 09:34:08

16 there to make sure the radio, the tools are 09:34:11

17 present and you have to -- that's like where the 09:34:14

18 officers will go if they have to use the rest room 09:34:16

19 really bad or if they need their paperwork so 09:34:19

20 it's usually checked. 09:34:29

21 Is there a time -- can I use the rest 09:34:31

22 room? 09:34:33

23 MR. FLEISHER: Of course, yes. We've been 09:34:33

24 going for about an hour. This is a great place 09:34:36

25 for a break. Should we take about ten minutes and 09:34:38

Transcript of Shanita McCall
Conducted on March 22, 2022

43

1 come back at 10:45 Eastern. Sorry, let's go off 09:34:41
2 the record. 09:34:47
3 THE VIDEOGRAPHER: Going off the record. 09:34:49
4 The time is 9:34. It's the end of recording one. 09:34:51
5 (A recess was had.) 09:34:54
6 THE VIDEOGRAPHER: The time is 9:46. 09:46:14
7 We're on the record at the start of recording two. 09:46:16
8 BY MR. FLEISHER: 09:46:22
9 Q Great. Was that enough time for you, 09:46:23
10 Ms. McCall? 09:46:25
11 A Yes, thank you. 09:46:26
12 Q Of course. No problem. 09:46:27
13 Ms. McCall, would there ever be -- could 09:46:29
14 an officer get permission to bring an offender 09:46:40
15 into this closet that we've talked about with 09:46:42
16 them? 09:46:44
17 A Extenuating circumstances like a 09:46:48
18 supervisor would be present if, like, say, for 09:46:55
19 instance there was a maintenance issue and 09:47:00
20 maintenance had to go in there for a reason, then 09:47:04
21 an offender would go in with maintenance, but just 09:47:07
22 an ordinary offender, no, but like if the toilet 09:47:11
23 was backed up and he needed the offender to help 09:47:18
24 him with the tools or whatever it is he was doing, 09:47:20
25 the maintenance person, would be like the only 09:47:23

Transcript of Shanita McCall
Conducted on March 22, 2022

44

1 reason I could think of at the moment. 09:47:28

2 Q Was Officer Arneika Smith a maintenance 09:47:30

3 person? 09:47:33

4 A She is not. 09:47:34

5 Q In that instance where a maintenance 09:47:35

6 person needed an offender to go in that closet 09:47:39

7 with them, would they have to get permission from 09:47:44

8 someone? 09:47:47

9 A We would know or they would notify us that 09:47:47

10 they were a supervisor or someone of a high 09:47:49

11 command was notified so they would go in with 09:48:01

12 them. 09:48:04

13 Q Would they lock the offender inside? 09:48:04

14 A No. 09:48:07

15 Q Did Officer Arneika Smith notify you that 09:48:07

16 she was going into that closet with offender 09:48:13

17 Ashley Diamond? 09:48:15

18 A No. 09:48:16

19 Q What was Officer Arneika Smith's 09:48:27

20 reputation in the prison? 09:48:30

21 MS. LONG: Objection to the form. 09:48:31

22 BY MR. FLEISHER: 09:48:35

23 Q You can go ahead and answer, Ms. McCall. 09:48:35

24 A I'm not sure what she's known about in the 09:48:42

25 prison. I don't know what her reputation was or 09:48:46

Transcript of Shanita McCall
Conducted on March 22, 2022

45

1	is.	09:48:55
2	Q Was she known to be too close with	09:48:57
3	offenders?	09:49:01
4	MS. LONG: Objection to the form.	09:49:01
5	BY THE WITNESS:	09:49:04
6	A Yes. I don't -- yes.	09:49:05
7	BY MR. FLEISHER:	09:49:10
8	Q Can you tell us what you know about that?	09:49:15
9	A I just heard -- I had heard -- well, like	09:49:25
10	an instance where I know she was just beginning as	09:49:44
11	a cadet, and she would hold conversation -- like	09:49:50
12	talk to the offenders as if you -- as if she was	09:50:00
13	talking to someone that maybe she'd known or like	09:50:06
14	someone who was outside of -- I'm not saying that	09:50:17
15	she was too personal with offender, but like you	09:50:19
16	would talk to just someone you would meet outside	09:50:22
17	a facility and, you know, we did talk -- there was	09:50:25
18	talk of that, but to my knowledge she was talked	09:50:35
19	to in reference to the correct way to interact	09:50:42
20	with an offender and that's just I remember when	09:50:46
21	she first came into the facility like a cadet, she	09:50:55
22	wasn't even an officer at the time so..	09:50:58
23	Q Did you hear about her having in	09:51:03
24	appropriate conversations with offenders?	09:51:05
25	A I don't know. Not to me.	09:51:07

Transcript of Shanita McCall
Conducted on March 22, 2022

46

1 Q Did you hear about that, though? 09:51:09

2 A No, not to me, no, uh-uh. 09:51:10

3 Q Did you ever hear about her talking about 09:51:19

4 sexual topics with offenders? 09:51:21

5 A No, not that I -- not that I've heard, no. 09:51:25

6 Q Did you ever hear of Officer Arneika Smith 09:51:38

7 engaging in financial transactions with offenders? 09:51:46

8 A Not to my knowledge. 09:51:54

9 Q I believe you said before that you didn't 09:52:05

10 find Officer Smith's explanation for why she was 09:52:09

11 in the closet with offender Ashley Diamond 09:52:12

12 believable; is that right? 09:52:16

13 A Yeah. That wasn't my words, but I said it 09:52:19

14 wasn't particularly something that I believed at 09:52:23

15 the moment, no. 09:52:27

16 Q Why not? 09:52:29

17 A Because the office is -- it's not that big 09:52:32

18 to where I would need assistance looking for a 09:52:41

19 jacket but -- 09:52:45

20 Q So if you walked into that office, how 09:52:51

21 long do you think it would take you to find a 09:52:54

22 jacket? 09:52:55

23 MS. PIPER: I'm going to object to the 09:53:03

24 form. 09:53:04

25 BY THE WITNESS: 09:53:06

Transcript of Shanita McCall
Conducted on March 22, 2022

47

1	A I'm not sure. It wouldn't take very long.	09:53:07
2	BY MR. FLEISHER:	
3	Q Would it take more than two minutes?	09:53:29
4	MS. PIPER: I'm going to object to the	09:53:33
5	form.	09:53:35
6	BY THE WITNESS:	09:53:35
7	A Again, I don't know. It wouldn't -- I	09:53:36
8	don't know.	09:53:39
9	BY MR. FLEISHER:	09:53:39
10	Q Where there anywhere where you could put a	09:53:48
11	jacket in that office?	09:53:50
12	A Yes.	09:53:51
13	Q Where would that be?	09:53:54
14	A On a hook or on the shelf. That's about	09:54:03
15	it.	09:54:14
16	Q Were those areas visible as soon as you	09:54:18
17	walked into the office?	09:54:23
18	A Yes.	09:54:24
19	Q Was Officer Arneika Smith a believable	09:54:36
20	person?	09:54:40
21	MS. LONG: Object to the form.	09:54:40
22	BY THE WITNESS:	09:54:42
23	A I guess it would depend on the	09:54:53
24	circumstances. She could be.	09:54:57
25	BY MR. FLEISHER:	09:54:58

Transcript of Shanita McCall
Conducted on March 22, 2022

48

1	Q What circumstances would she be -- what	09:54:59
2	circumstances are you thinking of when you say	09:55:01
3	that?	09:55:02
4	A As it relates to her being tardy, I know	09:55:04
5	that we had a conversation about her being tardy	09:55:14
6	and why she was tardy and she was believable. She	09:55:17
7	was believable, so..	09:55:23
8	Q Were there times where you found her to	09:55:26
9	not be believable?	09:55:30
10	A I would say just not believable but there	09:55:45
11	were questionable times, I don't remember a time	09:55:48
12	where just you're flat out lying, I don't remember	09:55:52
13	any of those, but where the words that she was	09:55:54
14	saying was questionable, yes.	09:56:02
15	Q Do you know when Officer Arneika Smith	09:56:03
16	left GDC?	09:56:05
17	A Do I know when she left?	09:56:08
18	Q Yes.	09:56:09
19	A I don't know for sure, no.	09:56:10
20	Q Do you know why she left?	09:56:12
21	A No, not -- no, not really, no.	09:56:16
22	Q Were you still at GDCP when she left or	09:56:19
23	had you moved on to your new position?	09:56:24
24	A I'm not sure because I was not on her	09:56:28
25	shift anymore so it was not incumbent for me to	09:56:35

Transcript of Shanita McCall
Conducted on March 22, 2022

49

1	see different people from different shifts or	09:56:40
2	different keys when I wasn't at work so I'm not	09:56:43
3	sure.	09:56:45
4	Q So you don't know?	09:56:45
5	A No.	09:56:46
6	Q How did you feel about her leaving?	09:56:54
7	A How did I feel about what?	09:56:58
8	Q Sorry. How did you feel about Officer	09:57:00
9	Arneika Smith leaving GDCP or GDC?	09:57:04
10	MS. LONG: Objection to the form.	09:57:08
11	MS. PIPER: Object to the form.	09:57:09
12	BY THE WITNESS:	09:57:10
13	A I had no feelings.	09:57:11
14	BY MR. FLEISHER:	09:57:17
15	Q Did you try to get her fired?	09:57:18
16	A No.	09:57:20
17	Q We talked about the incident in the closet	09:57:27
18	and I believe you said you -- I want go back, I	09:57:34
19	should ask you.	09:57:38
20	Do you remember an investigation that you	09:57:39
21	participated in about that incident?	09:57:42
22	A I don't remember the investigation. I	09:57:48
23	don't remember. It's been awhile so that's why I	09:57:55
24	asked if you had any incident reports or anything	09:57:58
25	that I had signed to help jar the memory because I	09:58:00

Transcript of Shanita McCall
Conducted on March 22, 2022

50

1 don't remember other than speaking with Ms. Smith 09:58:04
2 -- Ms. Smith, Lachisa Smith. So I'm not sure. 09:58:07
3 MR. FLEISHER: Matt, can we bring up DEF 09:58:24
4 1447, please, this is an audio recording and if we 09:58:26
5 can have this marked as McCall Exhibit 2, please. 09:58:31
6 (A certain document was marked McCall 09:58:33
7 Deposition Exhibit 2 for identification,
8 as of 03/22/2022.) 09:58:54
9 MR. FLEISHER: If we can play the 09:58:54
10 beginning of this and I'll tell you when to stop, 09:58:59
11 please. I'm not hearing anything. I don't know 09:59:02
12 if others are. 09:59:38
13 THE WITNESS: No. 09:59:38
14 AV TECH WEEDON: I'm not sure. Give me 09:59:39
15 one second. I'm not sure what's going on. 09:59:42
16 (Audio played.) 10:01:13
17 MR. FLEISHER: You can stop the recording, 10:01:13
18 please. 10:01:15
19 BY MR. FLEISHER: 10:01:15
20 Q Ms. McCall, do you recognize the voices on 10:01:21
21 that recording in Exhibit 2? 10:01:23
22 A I do. 10:01:25
23 Q Who are they? 10:01:25
24 A I know one is it sounds like me, one is 10:01:26
25 me, and the other one is special agent I believe 10:01:33

Transcript of Shanita McCall
Conducted on March 22, 2022

51

1	Johnson.	10:01:36
2	Q Do you recall giving this interview with	10:01:39
3	Special Agent Johnson?	10:01:42
4	A Not really, but I do remember it, but I	10:01:50
5	don't remember -- I don't remember what was said.	10:01:56
6	I --	10:02:00
7	Q Sorry. But do you remember participating	10:02:01
8	in this interview?	10:02:03
9	A Yes.	10:02:05
10	Q Okay. Thank you.	10:02:08
11	Do you recall if this was part of the	10:02:13
12	investigation into the incident we discussed	10:02:14
13	before?	10:02:16
14	A According to the recording it was.	10:02:20
15	Q Is that consistent with your memory?	10:02:24
16	A Yes and no. I don't remember the actual	10:02:27
17	conversation. I remember this as a separate	10:02:39
18	incident that they included it with so, so no I	10:02:44
19	guess with my memory.	10:02:53
20	Q So when you say a separate incident that	10:02:56
21	they included it with, what do you mean by that?	10:02:58
22	A It was an incident where I believe Officer	10:03:01
23	Smith filed a complaint against me, and then it	10:03:17
24	was also investigated with -- well -- with the	10:03:24
25	PREA incident. So I don't -- I think that's how I	10:03:28

Transcript of Shanita McCall
Conducted on March 22, 2022

52

1	remembered it.	10:03:38
2	Q When you say the PREA incident, you're	10:03:38
3	referring to the incident involving Officer	10:03:41
4	Arneika Smith and Offender Ashley Diamond?	10:03:43
5	A That's correct.	10:03:45
6	MR. FLEISHER: If we can, Matt, go to the	10:03:53
7	15-minute mark on this recording, please.	10:03:54
8	BY MR. FLEISHER:	10:03:57
9	Q Ms. McCall, I'm going to ask Matt to play	10:03:57
10	a little of this recording and I'm going to ask	10:04:00
11	you some questions.	10:04:03
12	A Okay.	10:04:04
13	Q Thank you.	10:04:05
14	MR. FLEISHER: Go ahead, Matt.	10:04:06
15	(Audio played.)	10:05:32
16	MR. FLEISHER: Can you stop the recording,	10:05:32
17	please. Thank you, Matt.	10:05:34
18	BY MR. FLEISHER:	10:05:35
19	Q Ms. McCall, do you recognize the voice	10:05:36
20	there?	10:05:37
21	A Yes.	10:05:38
22	Q Who was that?	10:05:38
23	A Me and the same special agent.	10:05:40
24	Q Do you recall what you were talking about?	10:05:42
25	A Yes. There was an officer that	10:05:44

Transcript of Shanita McCall
Conducted on March 22, 2022

53

1 relieved -- that Officer Smith was coming to 10:05:54
2 relieve and she called OIC, the office where I 10:06:00
3 was, and said, hey, I had her do a statement and 10:06:07
4 turn it into the major, she said that we needed to 10:06:09
5 speak with Officer Smith about being too friendly 10:06:18
6 with the offenders because she was like hugging 10:06:21
7 and jacking up the offenders, and I asked was she 10:06:29
8 sure, she said yes. I told her write it in a 10:06:33
9 statement and give it to the major. 10:06:36
10 Q When you're saying Officer Smith, again, 10:06:38
11 just to be clear, are you referring to Officer 10:06:41
12 Arneika Smith? 10:06:44
13 A Yes. 10:06:44
14 Q You were told she was hugging offenders? 10:06:51
15 A She was handing out hugs and jacking up 10:06:53
16 the offenders. 10:06:57
17 Q Is that appropriate behavior? 10:06:57
18 A No. 10:06:59
19 Q And the recording, I think, correct me if 10:07:07
20 I'm wrong, you also said she's a bad liar? 10:07:09
21 A On the recording I did. 10:07:12
22 Q What did you mean by that? 10:07:14
23 A There was an instance if memory serves me 10:07:16
24 correct she was in training and she -- I don't 10:07:25
25 remember the exact -- yes, I do. Captain -- well, 10:07:45

Transcript of Shanita McCall
Conducted on March 22, 2022

54

1 she's now captain, she was lieutenant at the time, 10:07:50
2 and Sergeant Stuart were over the cadets and I was 10:07:53
3 brought in to mediate or it not mediate but to 10:08:00
4 kind of bear witness to the I guess you would call 10:08:04
5 the interaction between the sergeant and the 10:08:16
6 cadet, which was Sergeant Stuart and the cadet, 10:08:20
7 she was a cadet or just -- I think she was still a 10:08:25
8 cadet at the time Smith, Arneika, and she did 10:08:28
9 not -- I was there and I was present when the 10:08:36
10 conversation was going on between the sergeant and 10:08:40
11 Arneika Smith, and Arneika Smith then went to the 10:08:44
12 major and told the major -- she told the tale, she 10:08:50
13 lied to the major, about the way that the sergeant 10:08:54
14 spoke to her and I was present. I was present for 10:09:03
15 that. So that was the time where she became 10:09:07
16 questionable in the beginning for me. 10:09:15
17 Q So just to be clear, you're saying Officer 10:09:17
18 Arneika Smith lied to the major? 10:09:20
19 A Yes. 10:09:22
20 MR. FLEISHER: Matt, we can take this 10:09:26
21 down. Sorry. I should have said that before. 10:09:28
22 BY MR. FLEISHER: 10:09:39
23 Q Ms. McCall, did you ever text Officer 10:09:40
24 Arneika Smith? 10:09:43
25 A Did I ever what? 10:09:46

Transcript of Shanita McCall
Conducted on March 22, 2022

55

1	Q	Sorry. Text her, send her a text?	10:09:47
2	A	I don't think so.	10:09:54
3	Q	Did you ever send inappropriate	10:09:56
4		photographs to Officer Arneika Smith?	10:10:03
5	A	Never, no, never.	10:10:05
6	Q	Did you ever spread rumors about Arneika	10:10:08
7		Smith touching an offender or having personal	10:10:11
8		dealings with an offender?	10:10:15
9	A	No.	10:10:17
10	Q	The closet that we've talked about where	10:10:23
11		this incident between Officer Arneika Smith and	10:10:25
12		Ashley Diamond took place, are there cameras	10:10:30
13		there?	10:10:34
14	A	Inside the closet?	10:10:35
15	Q	Yes.	10:10:36
16	A	No, not to my knowledge.	10:10:37
17	Q	Are there cameras outside the closet sort	10:10:44
18		of focused on the door?	10:10:48
19	A	There is cameras inside of the cell house,	10:10:49
20		but I can't say for sure that there was a camera	10:10:51
21		focused on that door on that day and it worked so	10:10:54
22		I don't know.	10:10:57
23	Q	Did you ever check the cameras to see?	10:10:57
24	A	I did not.	10:11:01
25	Q	Do you know if anyone else did?	10:11:02

Transcript of Shanita McCall
Conducted on March 22, 2022

56

1 A I'm not sure. 10:11:03

2 MR. FLEISHER: I am probably very close to 10:11:10

3 being finished, officer McCall. If we can take 10:11:12

4 about two or three minutes, I just want to look 10:11:17

5 over my notes to make sure I don't have anything 10:11:21

6 else and then I think we can see if Ms. Long has 10:11:23

7 any questions for you. 10:11:28

8 So can we go off the record for just two 10:11:30

9 or three minutes. Is that okay with everyone? 10:11:33

10 THE VIDEOGRAPHER: Okay. I'll bring us 10:11:37

11 off. The time is 10:11. We're going off the 10:11:39

12 record. 10:11:43

13 (A recess was had.) 10:11:43

14 THE VIDEOGRAPHER: The time is 10:16. 10:16:30

15 We're on the record continuing recording two. 10:16:33

16 BY MR. FLEISHER: 10:16:36

17 Q Ms. McCall, I just have a few more 10:16:37

18 questions and then I promise I will turn it over. 10:16:39

19 Thank you for bearing with us here. 10:16:43

20 Are you familiar with someone named 10:16:45

21 Officer McCumber? 10:16:47

22 A Yes. 10:16:54

23 Q Who is that? 10:16:55

24 A She was an officer when I was at Georgia 10:16:56

25 Diagnostic. 10:17:11

Transcript of Shanita McCall
Conducted on March 22, 2022

57

1 MR. FLEISHER: Matt, can we pull up DEF 10:17:11
2 1441, please. And mark that as McCall I guess 10:17:14
3 we're on Exhibit 3. 10:17:20
4 (A certain document was marked McCall 10:17:22
5 Deposition Exhibit 3 for identification, 10:17:40
6 as of 03/22/2022.) 10:17:40
7 AV TECH WEEDON: One second. 10:17:40
8 MR. FLEISHER: Thank you. 10:17:42
9 If you can play this from the beginning, 10:18:13
10 Matt, I'll tell you when to stop. Thank you. 10:18:16
11 (Audio played). 10:18:21
12 MR. FLEISHER: Sorry, Matt. You can stop 10:20:16
13 it. Thank you and you can take this down. 10:20:20
14 BY MR. FLEISHER: 10:20:26
15 Q Ms. McCall, do you recognize the voices on 10:20:26
16 that recording? 10:20:28
17 A Yes. 10:20:29
18 Q Who were they? 10:20:29
19 A Officer McCumber and the Special Agent 10:20:33
20 Johnson. 10:20:41
21 Q And that's the special agent that 10:20:41
22 conducted your interview; is that right? 10:20:43
23 A Yes. 10:20:44
24 Q Thank you. 10:20:45
25 Are you aware, Ms. McCall, that Officer 10:20:50

Transcript of Shanita McCall
Conducted on March 22, 2022

58

1 Arneika Smith accused you of sending inappropriate 10:20:53
2 photos to her? 10:20:56
3 MS. LONG: Objection to the form. 10:20:57
4 BY THE WITNESS: 10:21:05
5 A I believe that -- I believe that was part 10:21:05
6 of the interview with special agent. I believe 10:21:11
7 she asked me if I had ever sent any inappropriate 10:21:20
8 pictures or messages to Officer Arneika Smith, and 10:21:30
9 that was the first time I heard of it. 10:21:39
10 BY MR. FLEISHER: 10:21:41
11 Q Were you out to get Officer Arneika Smith? 10:21:41
12 MS. LONG: Objection to the form. 10:21:43
13 BY THE WITNESS: 10:21:44
14 A No. 10:21:45
15 MR. FLEISHER: I don't have any more 10:21:56
16 questions. Thank yo very much, Ms. McCall. I 10:21:58
17 appreciate it and I will pass it to Ms. Long. 10:22:01
18 EXAMINATION 10:22:04
19 BY MS. LONG:
20 Q Good morning, Ms. McCall. My name is 10:22:05
21 Terry Long, and as previously indicated, I 10:22:07
22 represent Arneika Smith in this case where she's 10:22:09
23 sued by in made Diamond. I just have a few 10:22:14
24 follow-up questions. 10:22:17
25 A Okay. 10:22:19

Transcript of Shanita McCall
Conducted on March 22, 2022

1 Q Would you describe for us, what is count? 10:22:27

2 A What is what? 10:22:29

3 Q Count at a prison? 10:22:30

4 A It's a procedure that is put in place for 10:22:32

5 offender accountability where one officer count, 10:22:36

6 one officer covers and count the building or the 10:22:40

7 quad or the area that you're counting in, one 10:22:44

8 officer will go in while one officer watches the 10:22:49

9 first officer count. When that officer is done 10:22:53

10 counting, the second officer counts and then they 10:22:56

11 compare numbers to make sure that they got the 10:23:01

12 same number. They call in the count. They give 10:23:03

13 that count to the count clerk and once the count 10:23:06

14 clerk receives all the counts from the different 10:23:08

15 areas, the count is considered complete and clear 10:23:11

16 once that happens. 10:23:15

17 Q How often is that done in a prison? 10:23:18

18 A It is policy that it's done at least five 10:23:23

19 times a day. There are at least five official 10:23:29

20 counts. 10:23:34

21 Q Is there a set time when the five counts 10:23:34

22 occur? 10:23:36

23 A At Georgia Diagnostic, yes. 10:23:39

24 Q What were those times back on May 10, 10:23:44

25 2020. 10:23:50

Transcript of Shanita McCall
Conducted on March 22, 2022

60

1 A There was I believe a 3:00 count, 5:00 -- 10:23:55

2 Q I'm sorry, I don't mean to interrupt you. 10:24:00

3 Could you specify if you're talking about a.m. or 10:24:02

4 p.m. 10:24:05

5 A Yes, I apologize. There is a 3:00 a.m. 10:24:05

6 count, a 5:00 a.m. count, an 8:00 a.m. count, and 10:24:08

7 11:00 a.m. count. I want to say 1:00 count p.m., 10:24:17

8 4:00 p.m., 6:00 p.m. and 8:00 p.m. and 11:00 p.m. 10:24:32

9 Q So counts were conducted during these 10:24:48

10 times back on May 10, 2020 at GDCP? 10:24:50

11 A Around those times. I don't remember the 10:24:58

12 specific actual times, but, yeah, they were 10:25:03

13 conducted around those times. 10:25:07

14 Q Is there requirement that they be 10:25:08

15 conducted every so often like every three hours, 10:25:09

16 every two hours, every four hours, something of 10:25:13

17 that nature? 10:25:16

18 A It's in that nature, yes, but not 10:25:17

19 specifically two or three hours, but, yes, there 10:25:19

20 are specific times. 10:25:21

21 Q Did you know approximately the time 10:25:25

22 between counts at GDCP during May 10th? 10:25:27

23 A Generally there's about two or three hours 10:25:35

24 in between counts so.. 10:25:38

25 Q Are other -- let me ask you this. If an 10:25:43

Transcript of Shanita McCall
Conducted on March 22, 2022

61

1 inmate is it not accounted for, what happens? 10:25:45

2 A If there is an instance where an inmate is 10:25:47

3 not accounted for, an emergency count is conducted 10:25:50

4 where all the offenders go back to their assigned 10:25:55

5 cells so we can pinpoint what offender it is and 10:26:00

6 at that point we're doing an extensive count where 10:26:05

7 we're doing IDs, bed, bodies, which is connecting 10:26:09

8 a specific person with that bunk and checking the 10:26:17

9 rosters that way so we can pinpoint that offender 10:26:20

10 that is missing. And in the event that an 10:26:25

11 offender is actually missing or escaped, then we 10:26:29

12 enact the policies for an escaped offender or a 10:26:32

13 missing offender so the facility goes into 10:26:39

14 lockdown mode. 10:26:44

15 Q Was there anything like that that occurred 10:26:47

16 on May 10, 2020? Was there an emergency count or 10:26:50

17 emergency mode? 10:26:56

18 A I'm not sure on May -- I'm not sure. 10:26:58

19 Usually if there is an emergency count, there is 10:27:11

20 an incident report done. 10:27:12

21 Q Okay. Thank you for that. 10:27:18

22 What about other times of the day, are 10:27:20

23 there any other less formal counting done? 10:27:23

24 A Yes. An officer is counting their 10:27:28

25 building random times throughout the day to ensure 10:27:33

Transcript of Shanita McCall
Conducted on March 22, 2022

62

1 their offender accountability, but there are times 10:27:37
2 we have an official and we have a census count. 10:27:39
3 The official counts are counts where we 10:27:42
4 have to -- once we do that counting procedure we 10:27:45
5 write down on count sheets to turn in for filing 10:27:49
6 purposes for recordkeeping and then there are 10:27:53
7 census counts where we're just doing a body count 10:27:56
8 and then we call it into the count clerk and then 10:27:58
9 when the numbers match up for the facility, the 10:28:01
10 count is clear and we don't have to necessarily 10:28:04
11 write it on an official count form. And 10:28:06
12 separately that officer does count their building 10:28:10
13 throughout the day just as the officer feels the 10:28:13
14 need to check her -- his or her accountability. 10:28:16
15 Q About how often during the day would that 10:28:22
16 normally happen? 10:28:25
17 A It occurs for different officers. It 10:28:26
18 differs, so.. 10:28:28
19 Q If there is a shift change on a post in a 10:28:30
20 house, is a count done at that time? 10:28:37
21 A Typically, yes, when we switch shifts, 10:28:39
22 when we relieve or take post, it is your duty to 10:28:42
23 make sure that you know how many offenders in, how 10:28:45
24 many out, and if there are any out of the pod 10:28:47
25 where they are. 10:28:50

Transcript of Shanita McCall
Conducted on March 22, 2022

63

1 Q When an officer switches shifts, how do 10:29:00
2 they obtain keys? Could you explain that process? 10:29:03
3 A If an officer, if you're working a pod and 10:29:09
4 you're being relieved, you don't take keys, tools 10:29:12
5 or equipment you verify the count until the count 10:29:18
6 is cleared. Once that account is cleared, you 10:29:20
7 hand the officer the keys tools and equipment, 10:29:22
8 that's how you changed over any pertinent 10:29:27
9 information, that's how they get the keys, 10:29:29
10 hand-to-hand transactions to the officer that 10:29:32
11 relieves them. 10:29:34
12 Q Is that required as a matter of policy? 10:29:39
13 A Yes. 10:29:41
14 Q What about the radio, how do officers when 10:29:42
15 they take their post how do they get their radio? 10:29:44
16 A Different pods have different radios. 10:29:50
17 There are different -- like living units have -- 10:29:55
18 typically have radios assigned to that unit, so 10:30:01
19 along with the keys, tools that's part of the 10:30:05
20 equipment for that pod. Different auxiliary posts 10:30:07
21 that's not a housing unit, they chit out a radio 10:30:12
22 from main control. 10:30:17
23 Q An officer taking over C-House back in 10:30:18
24 2020, how would they get their radio? 10:30:22
25 A If there was a radio assigned to 10:30:26

Transcript of Shanita McCall
Conducted on March 22, 2022

64

1 C-building or C-House, it's usually with the keys, 10:30:29
2 tools and equipment, however, sometimes the radio 10:30:32
3 assigned to that housing unit may not be working 10:30:34
4 so they would have to chit one out from main 10:30:37
5 control. 10:30:40

6 Q When you say that's part of the tools 10:30:45
7 being turned over, does the officer relieving the 10:30:48
8 shift obtain the radio from the officer who has 10:30:53
9 the shift; is that -- 10:30:59

10 A Yes, depending if there are no issues, 10:31:00
11 they keep that radio and they chit out -- they 10:31:06
12 switch out chits and then that officer relieved 10:31:09
13 turns their chit into main control and leaves. 10:31:12
14 And if there is an issue with the radio, then of 10:31:13
15 course they would switch out from main control. 10:31:16

16 Q I have heard that they have problems with 10:31:19
17 radios sometimes. 10:31:21

18 You I believe indicated on May 10, 2020 10:31:31
19 you received a call from Officer Ridley about 10:31:34
20 these events; is that correct? 10:31:39

21 A If that's the date on the paperwork, I'm 10:31:47
22 assuming, yes. 10:31:50

23 Q Had how did he call you? Was it a 10:31:50
24 telephone, radio or do you know? 10:31:52

25 A I don't remember. Typically they do the 10:31:54

Transcript of Shanita McCall
Conducted on March 22, 2022

65

1 radio traffic, but if its a phone in that unit, 10:32:04
2 they'll call the officer on the phone. 10:32:07
3 Q At any time that day, did you see Officer 10:32:12
4 Ridley in person? 10:32:15
5 A Did I what? 10:32:25
6 Q Let me clarify. 10:32:26
7 The date of the incident being reported by 10:32:27
8 Officer Ridley by Officer Smith and inmate Diamond 10:32:30
9 in the closet, did you actually meet with Officer 10:32:33
10 Ridley at any point during that day? 10:32:37
11 A It was either that day or that morning. 10:32:39
12 I'm not sure, but, yes, I did speak with him in 10:32:41
13 regards to that incident. 10:32:44
14 Q I understand you said he called you. 10:32:50
15 Did he speak with him in person? 10:32:52
16 A Yes. 10:32:53
17 Q What time of the day was that? 10:32:57
18 A Again, I'm not sure what time of the day 10:32:58
19 it was. I'm assuming it was later that evening or 10:33:01
20 later that evening because I did ask about what 10:33:07
21 happened. It could have been while I was making 10:33:12
22 rounds or seeing him in the hallway. I'm not 10:33:14
23 sure. 10:33:18
24 Q Do you recall what time of the day the 10:33:19
25 telephone call came in from Officer Ridley? 10:33:21

Transcript of Shanita McCall
Conducted on March 22, 2022

67

1 A Not off my head. I can't quote it right 10:35:39
2 now, but its a breach in policy. It's a breach in 10:35:42
3 security, so.. 10:35:45
4 Q Were you aware that Inmate Diamond was an 10:35:49
5 orderly assigned to C-House? 10:35:52
6 A Not particularly, no. I know that there 10:35:58
7 are assigned orderlies in each unit. I'm not sure 10:36:00
8 who the assigned orderlies are because they change 10:36:03
9 from time to time so I don't -- 10:36:07
10 Q So at the time of this incident, you were 10:36:09
11 not aware that Inmate Diamond was an orderly? 10:36:11
12 MR. FLEISHER: Objection. 10:36:16
13 BY THE WITNESS: 10:36:20
14 A I was not aware that at that time that 10:36:21
15 Diamond was an orderly in that pod. 10:36:23
16 BY MS. LONG:
17 Q What do orderlies generally do when they 10:36:32
18 are assigned to C-House or -- I'll just leave it 10:36:34
19 at C-House? 10:36:46
20 A The orderly typically make sure that 10:36:46
21 there's no trash on the floor, they mop or they 10:36:48
22 wax or they clean the showers, sweep the floors. 10:36:53
23 They are really like it would be part of the 10:36:57
24 housekeeping of the cell, make sure that it's not 10:37:02
25 junky on the big floor and in the shower area. 10:37:05

Transcript of Shanita McCall
Conducted on March 22, 2022

68

1 Q Can orderlies go into a utility closet in 10:37:13
2 C-House? 10:37:17
3 A In the offender utility closet, yes, they 10:37:26
4 can get the brooms, the mops and the chemicals 10:37:30
5 they need for cleaning of the dorm, yes. 10:37:32
6 Q I believe you indicated that an inmate can 10:37:34
7 go into the officer's closet if they are assisting 10:37:37
8 maintenance; is that correct? 10:37:40
9 A I said what? 10:37:45
10 Q Did you testify that an orderly could go 10:37:47
11 into the officer's closet to assist with 10:37:52
12 maintenance? 10:37:55
13 A Permission and maintenance if there is any 10:38:00
14 extenuating circumstance and the maintenance 10:38:04
15 needed assistance maintenance crew, there is 10:38:06
16 permission given or there is supervision of that 10:38:11
17 offender and permission is given so we would know, 10:38:13
18 and there is never a time when they are locked in 10:38:17
19 the closet with an offender. 10:38:20
20 Q Did you have any knowledge about Officer 10:38:25
21 Arneika Smith leaving her jacket at the prison the 10:38:29
22 day before this incident occurred? 10:38:31
23 A I did not. 10:38:37
24 Q Do you have any knowledge about where she 10:38:46
25 stated her jacket was in the closet, the officer 10:38:48

Transcript of Shanita McCall
Conducted on March 22, 2022

69

1	closet, excuse me?	10:38:53
2	A I know when she spoke to me about finding	10:38:57
3	the jacket she said she didn't find it so I don't	10:39:01
4	know.	10:39:11
5	Q Did she ever tell you that the jacket was	10:39:11
6	on a shelf in the officer's office?	10:39:13
7	A No.	10:39:23
8	Q How many shelves are in the officer's	10:39:24
9	office?	10:39:26
10	A One shelf.	10:39:41
11	Q Just one that you recall?	10:39:42
12	A Just one.	10:39:43
13	Q If other folks testified that there was	10:39:45
14	more than one shelf, would you with have reason to	10:39:47
15	disbelieve them?	10:39:50
16	A No because the different -- I wouldn't	10:39:55
17	disbelieve them simply because of my memory.	10:39:57
18	Q How high is that shelf in the officer as	10:40:16
19	closet? Do you know?	10:40:19
20	A I don't know.	10:40:20
21	Q Do you recall about how tall Arneika Smith	10:40:21
22	was?	10:40:23
23	A I remember her being much shorter than	10:40:24
24	myself so..	10:40:27
25	Q Do you have any recollection of Arneika	10:40:34

Transcript of Shanita McCall
Conducted on March 22, 2022

70

1 Smith stating that she asked Inmate Diamond to get 10:40:36
2 her jacket off of a shelf? 10:40:43
3 A No. 10:40:50
4 Q When this incident was reported, did you 10:40:53
5 go to the officer's office? 10:40:55
6 A When it was initially reported to me? 10:41:00
7 Q Yes. 10:41:02
8 A No. 10:41:03
9 Q At any time on that day did you go and 10:41:04
10 inspect the officer's office? 10:41:07
11 A No, I didn't go inside the closet. 10:41:11
12 Q So basically you hadn't -- well, let me 10:41:18
13 ask you this. 10:41:24
14 Do you know what happened in that closet 10:41:25
15 on May 10, 2020 when Officer Smith and Inmate 10:41:28
16 Diamond were in there? 10:41:34
17 A No, I do not know. I was not present. 10:41:39
18 Q So without any evidence at all, you chose 10:41:42
19 not to believe Arneika Smith? 10:41:44
20 MR. FLEISHER: Objection. 10:41:48
21 BY THE WITNESS: 10:41:50
22 A I never -- I stated I -- I didn't say that 10:41:51
23 I didn't believe -- I said her words were 10:41:54
24 questionable because there is evidence from 10:41:56
25 personal knowledge of the size of closet it is so 10:42:01

Transcript of Shanita McCall
Conducted on March 22, 2022

71

1 I said that it was questionable what she was 10:42:05
2 saying. 10:42:09
3 BY MS. LONG: 10:42:10
4 Q So based on the size of the officer's 10:42:11
5 closet, you questioned her story? 10:42:14
6 A Yes. 10:42:21
7 Q And no other fact? 10:42:21
8 A The fact that -- the fact that there 10:42:24
9 was -- the closet is open enough to see what's 10:42:46
10 inside of the closet and the statement that she 10:42:49
11 said she never found the jacket and that she asked 10:42:59
12 the offender to help her look for her jacket was 10:43:06
13 questionable because of the size of the closet, 10:43:11
14 yes. 10:43:19
15 Q What size was the closet? 10:43:19
16 A The closet is about the size of the 10:43:23
17 average bathroom, when I say average bathroom, I'm 10:43:26
18 thinking maybe -- it may be the size of a cell 10:43:37
19 maybe. 10:43:49
20 Q If she stated in her statement that she 10:43:51
21 did find her jacket, do you have any reason to 10:43:57
22 disbelieve that statement? 10:44:00
23 MR. FLEISHER: Objection. Form. 10:44:03
24 BY THE WITNESS: 10:44:04
25 A Yes. Okay. Was that objection don't 10:44:04

Transcript of Shanita McCall
Conducted on March 22, 2022

72

1 answer or objection do answer. 10:44:10

2 MR. FLEISHER: No, go ahead and answer. 10:44:17

3 BY THE WITNESS: 10:44:18

4 A She stated to me that she didn't find the 10:44:18

5 jacket so is she telling -- 10:44:20

6 BY MS. LONG: 10:44:21

7 Q When did she tell you that? 10:44:22

8 A When I asked her why was she in the 10:44:24

9 closet. 10:44:26

10 Q I know but what time was that? What date 10:44:26

11 was that? 10:44:29

12 A It was either -- it was the same day or 10:44:35

13 that morning after when I asked why was she in the 10:44:37

14 closet. I'm assuming it was the same day. 10:44:40

15 Because she said she couldn't -- she didn't find 10:44:42

16 her jacket. 10:44:45

17 Q Is there any possibility that your 10:44:49

18 recollection may be incorrect? 10:44:50

19 A Not with her telling me that she didn't 10:44:54

20 find the jacket. No, I remember her saying she 10:44:59

21 didn't find her jacket. 10:45:05

22 Q Did she ever tell you why Inmate Diamond 10:45:11

23 was in the closet? 10:45:13

24 A Other than she just said he was helping 10:45:18

25 her find her jacket. 10:45:21

Transcript of Shanita McCall
Conducted on March 22, 2022

73

1 Q If Inmate Diamond said he found the 10:45:24
2 jacket, would you have any reason to disbelieve 10:45:28
3 Inmate Diamond? 10:45:29
4 A If Diamond stated that they found the 10:45:37
5 jacket, I would disbelieve because, once again, 10:45:39
6 she told me she didn't find the jacket. 10:45:42
7 Q If Officer Ridley stated that Officer 10:45:43
8 Smith found her jacket, would you disbelieve 10:45:51
9 Officer Ridley? 10:45:53
10 A I would disbelieve -- at this point it's 10:46:05
11 not up to me. It wasn't about who I believed 10:46:06
12 about the jacket. I know she told me that she 10:46:08
13 didn't find the jacket so it would be -- if she 10:46:11
14 said she found it, she lied to me, so even if they 10:46:16
15 say she found it then, she lied to me so it would 10:46:20
16 still be a situation where she didn't tell me the 10:46:24
17 truth. 10:46:26
18 Q If you would explain to me what you said 10:46:32
19 she lied about to a major about a cadet? 10:46:34
20 A No, about her. She was a cadet. 10:46:42
21 Q She was a cadet.
22 A She was going through the FTO program 10:46:47
23 which is the training for -- the field training 10:46:50
24 officer program for the cadets or newer officers, 10:46:55
25 and she had a disagreement with the sergeant and 10:46:59

Transcript of Shanita McCall
Conducted on March 22, 2022

74

1 the sergeant was very professional when she spoke 10:47:06
2 with Ms. Smith, Arneika Smith, and she was up 10:47:09
3 front with her about -- I don't remember the full 10:47:17
4 incident what they were -- what she was 10:47:21
5 counselling her with. I know when she went back 10:47:33
6 to the major she told the major as if Ms. Stuart 10:47:37
7 was very disrespectful and rude to her and mean, 10:47:40
8 you know, and was very not professional with her 10:47:43
9 but I was there and I know she was because I 10:47:49
10 watched the interaction. 10:47:51

11 Q So the lie that Ms. Arneika Smith stated 10:47:54
12 was that the sergeant was unprofessional; is that 10:48:07
13 correct? 10:48:09

14 MR. FLEISHER: Objection. 10:48:09

15 BY THE WITNESS: 10:48:11

16 A I'm not sure the verbiage that Ms. Smith 10:48:11
17 used with the major. I know the major questioned 10:48:15
18 me about whether or not there was any profanity 10:48:18
19 and whether or not Sergeant Stewart was 10:48:26
20 unprofessional with Officer Smith during that 10:48:29
21 interaction. 10:48:31

22 BY MS. LONG: 10:48:32

23 Q Is there anything else that you think she 10:48:33
24 lied about regarding this incident? 10:48:34

25 A Regarding this incident, I don't know. 10:48:49

Transcript of Shanita McCall
Conducted on March 22, 2022

75

1 Q I didn't ask the question very well. 10:48:50
2 Is there anything else that you think 10:48:53
3 Officer Smith lied about to the major? 10:48:54
4 A I don't know what else she told the major, 10:49:00
5 so I don't know. 10:49:02
6 Q So it was your opinion that the sergeant 10:49:06
7 acted professionally? 10:49:08
8 MR. FLEISHER: Objection. 10:49:11
9 BY MS. LONG: 10:49:12
10 Q Correct? 10:49:13
11 A The officer -- the sergeant acted within 10:49:15
12 policy of professionalism, yes, according to the 10:49:19
13 Code of Conduct, yes. 10:49:23
14 Q And it was Ms. Smith Arneika Smith's 10:49:27
15 opinion that the sergeant had not acted 10:49:29
16 professionally, correct? 10:49:31
17 MR. FLEISHER: Objection. 10:49:35
18 BY THE WITNESS: 10:49:35
19 A According to what the major asked me, she 10:49:36
20 falsely stated some things that were not accurate. 10:49:43
21 BY MS. LONG: 10:49:52
22 Q What were those things? 10:49:52
23 A He asked did she use profanity, which she 10:49:53
24 did not, and did Ms. Stewart get indignant at any 10:49:59
25 time pretty much. 10:50:03

Transcript of Shanita McCall
Conducted on March 22, 2022

76

1 Q Is there anything else that you think she 10:50:04
2 lied about, Officer Smith lied about? 10:50:11
3 A In regards to what? 10:50:19
4 Q To the major about the sergeant. 10:50:20
5 A Again, I don't know. 10:50:22
6 Q I'm just asking what you know, what you 10:50:24
7 know. Is there anything else that you know? 10:50:26
8 A According to this incident, that was all 10:50:30
9 at the moment that I can think of, the incident 10:50:34
10 because that's all the major asked me. 10:50:36
11 Q Are you aware that when Officer Ridley 10:50:55
12 found Arneika Smith and Inmate Diamond in the 10:51:03
13 closet, are you aware that Officer Ridley went 10:51:08
14 into the closet? 10:51:11
15 A With them? 10:51:14
16 Q Yes. 10:51:15
17 A No. 10:51:15
18 Q Are you aware that Officer Ridley did not 10:51:26
19 ask Inmate Diamond to leave the closet? 10:51:29
20 A I'm not aware. I was not there. I was 10:51:32
21 not advised of that. 10:51:35
22 Q As a supervisor, do you have an opinion as 10:51:37
23 to whether or not Officer Ridley should have asked 10:51:39
24 Inmate Diamond to leave the closet? 10:51:43
25 A As a supervisor Offender Diamond should 10:51:52

Transcript of Shanita McCall
Conducted on March 22, 2022

77

1 have been asked to leave that closet and made to 10:51:56
2 go back to Diamond's cell, I would have spoke with 10:52:03
3 the supervisor, yes, the offender should have been 10:52:16
4 instructed to leave. 10:52:18
5 Q Are you aware of officers ever sleeping in 10:52:24
6 the closet? 10:52:26
7 A I am not aware, uh-uh. 10:52:26
8 Q Did Officer Ridley indicate to you that he 10:52:28
9 failed to turn over the radio to Officer Smith 10:52:46
10 that day when Officer Smith relieved him at 10:52:50
11 C-House? 10:52:53
12 A I don't remember that. 10:53:02
13 Q You have no knowledge about the radio at 10:53:04
14 all that day? 10:53:08
15 A I didn't say I didn't have any knowledge. 10:53:09
16 I just said I don't remember so I don't know. I 10:53:11
17 don't remember anything about him not giving 10:53:15
18 her -- I believe that's what caused him to look 10:53:24
19 for her to give her the radio. That's what caused 10:53:27
20 the interaction, I believe that's how he found her 10:53:35
21 was because he was trying to give her or get -- it 10:53:38
22 was either he was giving her or getting the radio. 10:53:42
23 Q I believe you indicated that officers 10:53:58
24 should not shake hands with inmates; is that 10:53:59
25 correct? 10:54:03

Transcript of Shanita McCall
Conducted on March 22, 2022

78

1 MR. FLEISHER: Objection. 10:54:03

2 BY THE WITNESS: 10:54:04

3 A Yes. 10:54:05

4 BY MS. LONG: 10:54:07

5 Q Do you know a policy that prohibits 10:54:07

6 shaking hands with inmates? 10:54:11

7 A Yes. There is a policy that states there 10:54:20

8 should be no physical contact between an officer 10:54:22

9 and offender that is not policy related or in the 10:54:25

10 event of giving CPR or authorized use of forces. 10:54:28

11 Q Do you happen to know the number on that 10:54:36

12 policy? 10:54:40

13 A No, not right off my head, no. 10:54:47

14 Q Do you have any knowledge whatsoever of 10:54:49

15 why Officer Smith left GDC? 10:54:56

16 A No. I'm not -- I have no certain -- 10:55:06

17 nothing with certainty as to why she left or how 10:55:13

18 she left the department. 10:55:15

19 Q Regarding the investigation into the 10:55:19

20 May 10, 2020 incident, do you know the results of 10:55:22

21 that investigation? 10:55:28

22 A No, I don't. 10:55:31

23 Q You don't know the findings by SA Johnson 10:55:33

24 or anybody at Corrections? 10:55:39

25 A No, I didn't look -- I didn't follow up 10:55:40

Transcript of Shanita McCall
Conducted on March 22, 2022

79

1 with it. The last I heard it was under 10:55:43
2 investigation and that was years -- I think it was 10:55:52
3 years ago now. I didn't go back to find out or 10:55:54
4 inquire about it. 10:55:56
5 Q Do you have any reason to believe that 10:55:58
6 Officer Smith sexually assaulted Inmate Diamond in 10:56:02
7 the closet on May 10th? 10:56:04
8 A Ask the question again. 10:56:13
9 Q Do you have any reason to believe that 10:56:15
10 Arneika Smith sexually assaulted Inmate Diamond on 10:56:18
11 May 10, 2020? 10:56:22
12 MR. FLEISHER: Objection. 10:56:27
13 BY THE WITNESS: 10:56:27
14 A I don't know. 10:56:28
15 BY MS. LONG: 10:56:30
16 Q Is that you have no reason -- 10:56:32
17 A I don't know. I don't understand her 10:56:34
18 reasoning to be in a closet locked with an 10:56:40
19 offender so I don't know what her reasoning was. 10:56:43
20 Q I'm asking you. 10:56:45
21 Do you have any reason to believe a sexual 10:56:46
22 assault occurred on May 10th, 2020 between 10:56:49
23 Arneika -- by Arneika Smith? 10:56:54
24 MR. FLEISHER: Objection. 10:56:58
25 BY THE WITNESS: 10:57:00

Transcript of Shanita McCall
Conducted on March 22, 2022

80

1 A I don't have any reason to believe whether 10:57:00
2 a sexual assault happened or didn't happen so I 10:57:03
3 don't know. 10:57:07
4 BY MS. LONG: 10:57:07
5 Q What about the day before? Are you aware 10:57:08
6 of any allegations on May 9th that had Arneika 10:57:18
7 Smith was in the closet with Inmate Diamond on 10:57:21
8 May 9, 2020? 10:57:25
9 A I don't know. I just know it was only one 10:57:30
10 day reported to me. So I only knew about that one 10:57:33
11 day or that one incident. 10:57:35
12 Q Do you have any knowledge about how long 10:57:43
13 Arneika Smith was in the closet with Inmate 10:57:46
14 Diamond on May 10, 2020? 10:57:50
15 A I don't know. 10:57:52
16 MS. LONG: I don't think I have anything 10:57:59
17 further. 10:58:01
18 MR. FLEISHER: Are you looking at your 10:58:06
19 notes, Ms. Long, or are you done? 10:58:08
20 MS. LONG: I think I'm done. 10:58:09
21 MR. FLEISHER: I might just have a few 10:58:12
22 follow-ups, Ms. McCall. 10:58:14
23 FURTHER EXAMINATION 10:58:17
24 BY MR. FLEISHER: 10:58:19
25 Q Ms. Long was asking you I believe about 10:58:20

Transcript of Shanita McCall
Conducted on March 22, 2022

81

1 why you may not have believed Officer Arneika 10:58:23
2 Smith's explanation for why she was in the closet 10:58:27
3 with Ashley Diamond. You mentioned the size of 10:58:30
4 the closet. 10:58:33

5 Were there other reasons for you to 10:58:33
6 question what Officer Arneika Smith told you? 10:58:36

7 A I knew that Officer Smith had, you know, 10:58:47
8 maybe have -- I knew that she didn't always tell 10:58:56
9 the truth so and I'm not saying that this was an 10:58:58
10 incident where she was or wasn't telling the 10:59:03
11 truth. So I didn't really like take it and hold 10:59:06
12 onto the fact that she stated that they were 10:59:10
13 looking for a jacket. Also, the size of that 10:59:13
14 closet, it didn't make sense to me personally. So 10:59:15
15 I didn't believe nor disbelieve. I just reported 10:59:19
16 up what was told to me. 10:59:24

17 Q And, again, just to be clear, when you say 10:59:27
18 Officer Smith we're talking about Arneika Smith, 10:59:29
19 correct. 10:59:34

20 A Arneika Smith. Yes. 10:59:34

21 Q The call from Officer Ridley that morning 10:59:35
22 on May 10th, do you remember the exact time the 10:59:39
23 call came in? 10:59:42

24 A No. 10:59:49

25 Q And you had some -- you talked a little 10:59:50

Transcript of Shanita McCall
Conducted on March 22, 2022

82

1	bit about a radio with Ms. Long and what was going	10:59:51
2	on with a radio.	10:59:58
3	Is it possible that Officer Arneika Smith	11:00:02
4	was relieving Officer Ridley that morning on	11:00:06
5	May 10th?	11:00:11
6	A Can you hear me?	11:00:12
7	Q I can hear you.	11:00:14
8	MS. LONG: I think she's having trouble	11:00:19
9	hearing you.	11:00:21
10	MS. PIPER: Can you hear us?	11:00:25
11	BY THE WITNESS:	11:00:27
12	A Okay. When you asked your question, you	11:00:30
13	were muted.	11:00:32
14	BY MR. FLEISHER:	11:00:32
15	Q Can you hear me now?	11:00:33
16	A Yes.	11:00:35
17	Q Okay. Sorry about that. Sure. I don't	11:00:39
18	know where I left off. I'll just go back.	11:00:40
19	Is it possible that on May 10th, 2020	11:00:42
20	Officer Arneika Smith was relieving Officer	11:00:49
21	Ridley?	11:00:51
22	A It is possible. I know that they were --	11:00:57
23	there was a relieving between the two, and I	11:01:00
24	believe that the radio was the incident where he	11:01:06
25	went to look for her and I want to say he was	11:01:09

Transcript of Shanita McCall
Conducted on March 22, 2022

83

1 relieving her, but I'm not sure, again, I'm not 11:01:12
2 sure who was relieving who, but I know there was a 11:01:18
3 relieving going on and I'm almost sure he was 11:01:21
4 relieving her to take the radio back, but the 11:01:32
5 radio was the issue where he couldn't find her get 11:01:35
6 the radio or give radio to her and that's what 11:01:39
7 made him tell me he couldn't relieve because he 11:01:43
8 couldn't get the radio. 11:01:46

9 Q Did Officer Ridley tell you that he was 11:01:47
10 looking for Officer Arneika Smith but could not 11:01:50
11 find her? 11:01:53

12 A Yes. 11:01:54

13 MR. FLEISHER: I think that's it for me. 11:01:59
14 Thank you again, Ms. McCall. 11:02:01

15 MS. LONG: Thank you, Ms. McCall. 11:02:03

16 THE VIDEOGRAPHER: Okay. Is there 11:02:05
17 anything else to put on the record? 11:02:10

18 MR. FLEISHER: Not for me. 11:02:11

19 THE VIDEOGRAPHER: We're going off the 11:02:13
20 record. The time is 11:02. It's the end of 11:02:14
21 recording two. 11:02:18

22 (Deposition concluded at 11:03 a.m. CST.) 11:03:09
23
24
25

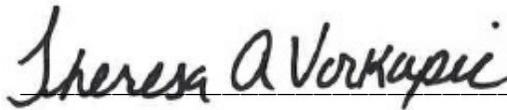
Transcript of Shanita McCall
Conducted on March 22, 2022

1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2
3 I, Theresa A. Vorkapic, Certified
4 Shorthand Reporter No. 084-2589, CSR, RMR, CRR,
5 RPR, and a Notary Public in and for the County of
6 Kane, State of Illinois, the officer before whom
7 the foregoing deposition was taken, do hereby
8 certify that the foregoing transcript is a true
9 and correct record of the testimony given; that
10 said testimony was taken by me and thereafter
11 reduced to typewriting under my direction; that
12 reading and signing was not requested; and that I
13 am neither counsel for, related to, nor employed
14 by any of the parties to this case and have no
15 interest, financial or otherwise, in its outcome.

16 IN WITNESS WHEREOF, I have hereunto set my
17 hand and affixed my notarial seal this 30th day of
18 March, 2022.

19 My commission expires November 6, 2023.

20
21 

22 THERESA A. VORKAPIC

23 NOTARY PUBLIC IN AND FOR ILLINOIS

Transcript of Shanita McCall
 Conducted on March 22, 2022

A			
aaron	76:4, 77:13,	administration	all
3:4, 6:15, 7:17	77:17, 79:4,	16:19, 16:21	7:20, 9:15,
able	80:5, 80:10,	advantage	13:22, 21:21,
10:19, 32:17	80:12, 80:25,	27:10	22:8, 27:17,
about	81:18, 82:1,	advised	32:4, 32:7,
14:9, 14:12,	82:17	76:21	38:23, 42:5,
14:14, 14:16,	above	advocating	59:14, 61:4,
14:20, 14:23,	18:14, 24:24,	20:15, 20:18	70:18, 76:8,
20:1, 20:5,	24:25	affecting	76:10, 77:14
20:9, 22:2,	acceptable	32:17	allegation
22:21, 23:6,	41:22	affixed	38:4
23:18, 24:11,	according	84:17	allegations
31:21, 31:24,	29:10, 30:6,	after	80:6
31:25, 32:4,	51:14, 75:12,	29:3, 30:22,	allow
32:7, 32:10,	75:19, 76:8	30:23, 40:1,	9:20
32:12, 32:19,	account	40:18, 40:24,	almost
32:22, 34:5,	31:11, 63:6	72:13	83:3
34:14, 34:15,	accountability	again	along
34:18, 34:19,	25:12, 59:5,	7:17, 14:21,	21:8, 63:19
34:20, 35:5,	62:1, 62:14	15:22, 18:2,	alpharetta
36:8, 38:14,	accounted	47:7, 53:10,	3:20
38:19, 38:20,	61:1, 61:3	65:18, 73:5,	also
39:24, 40:3,	accurate	76:5, 79:8,	4:9, 15:4,
40:17, 40:19,	75:20	81:17, 83:1,	18:7, 25:17,
40:25, 41:4,	accusation	83:14	35:5, 41:8,
42:24, 42:25,	23:2, 23:5	against	51:24, 53:20,
43:15, 44:24,	accused	37:18, 51:23,	81:13
45:8, 45:23,	58:1	66:15	always
46:1, 46:3,	acknowledge	agbaosi	81:8
47:14, 48:5,	21:9	39:2	amount
49:6, 49:7,	acknowledging	agent	30:12
49:8, 49:17,	21:2	50:25, 51:3,	another
49:21, 52:24,	acknowledgment	52:23, 57:19,	18:11
53:5, 54:13,	29:6	57:21, 58:6	answer
55:6, 55:10,	act	ago	9:21, 10:8,
56:4, 60:3,	23:23	20:22, 21:6,	13:6, 13:7,
60:23, 61:22,	acted	79:3	13:18, 22:16,
62:15, 63:14,	75:7, 75:11,	agree	36:25, 38:12,
64:19, 65:20,	75:15	10:22	44:23, 72:1,
68:20, 68:24,	actions	ahead	72:2
69:2, 69:21,	27:5, 27:20	10:8, 13:7,	answers
71:16, 73:11,	actual	13:18, 14:13,	9:19, 10:2,
73:12, 73:19,	51:16, 60:12	19:25, 21:12,	10:20
73:20, 74:3,	actually	22:16, 29:18,	any
74:18, 74:24,	61:11, 65:9	44:23, 52:14,	8:22, 9:19,
75:3, 76:2,	addressed	72:2	10:19, 11:21,
	7:21	alabama	12:21, 13:14,
	adjective	3:13	13:24, 14:2,
	21:10		

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>14:23, 17:22, 18:23, 18:25, 19:14, 21:16, 21:23, 21:24, 22:1, 22:19, 22:25, 23:3, 23:17, 25:18, 26:3, 26:4, 26:8, 26:11, 26:24, 27:8, 29:7, 31:6, 34:20, 37:1, 38:8, 39:7, 39:21, 40:16, 40:24, 41:20, 41:21, 42:6, 48:13, 49:24, 56:7, 58:7, 58:15, 61:23, 62:24, 63:8, 65:3, 65:10, 68:13, 68:20, 68:24, 69:25, 70:9, 70:18, 71:21, 72:17, 73:2, 74:18, 75:24, 77:15, 78:14, 79:5, 79:9, 79:21, 80:1, 80:6, 80:12, 84:14 anybody 78:24 anymore 34:1, 48:25 anyone 9:7, 9:9, 11:8, 14:16, 14:19, 22:23, 31:24, 38:20, 55:25 anything 11:14, 11:17, 14:9, 14:11, 20:5, 20:9, 22:21, 22:22, 23:3, 23:17, 25:19, 27:12, 32:1, 34:15,</p>	<p>34:18, 34:19, 39:8, 39:18, 39:20, 49:24, 50:11, 56:5, 61:15, 74:23, 75:2, 76:1, 76:7, 77:17, 80:16, 83:17 anywhere 47:10 apologize 18:18, 24:9, 60:5 appearance 6:23 appreciate 8:3, 38:15, 58:17 appropriate 45:24, 53:17 approximately 60:21 area 26:13, 59:7, 67:25 areas 26:15, 47:16, 59:15 arneika 1:8, 6:5, 7:2, 23:7, 24:2, 25:24, 26:9, 27:1, 29:13, 29:21, 30:6, 31:21, 35:5, 36:8, 36:23, 37:20, 44:2, 44:15, 44:19, 46:6, 47:19, 48:15, 49:9, 52:4, 53:12, 54:8, 54:11, 54:18, 54:24, 55:4, 55:6, 55:11, 58:1, 58:8, 58:11, 58:22, 68:21, 69:21, 69:25,</p>	<p>70:19, 74:2, 74:11, 75:14, 76:12, 79:10, 79:23, 80:6, 80:13, 81:1, 81:6, 81:18, 81:20, 82:3, 82:20, 83:10 around 19:16, 60:11, 60:13 ashley 1:5, 6:4, 6:17, 6:20, 6:22, 7:19, 19:17, 19:19, 19:23, 20:2, 20:10, 21:16, 23:10, 39:23, 44:17, 46:11, 52:4, 55:12, 81:3 asked 8:6, 13:17, 23:16, 34:14, 34:19, 34:23, 39:20, 40:5, 40:12, 49:24, 53:7, 58:7, 70:1, 71:11, 72:8, 72:13, 75:19, 75:23, 76:10, 76:23, 77:1, 82:12 asking 9:20, 13:18, 28:4, 29:15, 38:5, 66:23, 76:6, 79:20, 80:25 assault 22:11, 22:19, 23:18, 79:22, 80:2 assaulted 23:7, 79:6, 79:10 assigned 19:6, 61:4,</p>	<p>63:18, 63:25, 64:3, 67:5, 67:7, 67:8, 67:18 assignment 26:1 assignments 33:11, 36:1 assist 68:11 assistance 46:18, 68:15 assisting 68:7 associates 15:6, 15:8, 15:13 assume 10:8, 16:22, 30:24, 38:7, 39:12, 42:1 assuming 30:25, 34:12, 34:13, 64:22, 65:19, 72:14 atlanta 4:6 attached 5:8 attention 35:24 attorney 4:4, 12:23, 14:7, 14:14 audio 5:13, 5:14, 10:23, 50:4, 50:16, 52:15, 57:11 audiovisual 4:10 august 16:14, 17:6, 17:11 authorized 78:10 auxiliary 63:20</p>
--	--	---	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>av 28:10, 29:17, 50:14, 57:7 avenue 3:12 average 71:17 aware 22:7, 22:10, 25:13, 33:15, 38:11, 57:25, 67:4, 67:11, 67:14, 76:11, 76:13, 76:18, 76:20, 77:5, 77:7, 80:5 away 37:8 awhile 49:23</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>bachelors 15:4, 15:9, 15:13, 15:15 back 33:5, 43:1, 49:18, 59:24, 60:10, 61:4, 63:23, 74:5, 77:2, 79:3, 82:18, 83:4 backed 43:23 background 15:2, 24:10 bad 42:19, 53:20 ball 26:21 bark 24:12 barking 24:10 based 71:4 basically 70:12</p>	<p>bathroom 13:13, 41:7, 71:17 batteries 41:10 bear 54:4 bearing 56:19 became 54:15 because 8:7, 25:25, 26:22, 32:17, 33:9, 34:14, 34:22, 35:4, 35:24, 37:7, 37:11, 38:7, 39:9, 39:22, 40:8, 40:20, 46:17, 48:24, 49:25, 53:6, 65:20, 67:8, 69:16, 69:17, 70:24, 71:13, 72:15, 73:5, 74:9, 76:10, 77:21, 83:7 become 16:13 bed 61:7 been 7:12, 8:19, 9:12, 15:21, 16:6, 20:21, 23:7, 23:17, 29:3, 29:14, 31:11, 38:12, 42:23, 49:23, 65:21, 66:3, 77:1, 77:3 before 2:3, 8:20, 9:13, 9:19, 9:21, 13:18, 13:24, 15:25, 20:5, 26:1,</p>	<p>26:6, 27:21, 29:7, 30:15, 30:16, 31:3, 37:13, 42:13, 46:9, 51:13, 54:21, 68:22, 80:5, 84:6 began 17:1, 24:16, 31:1 beginning 45:10, 50:10, 54:16, 57:9 begins 6:2 behalf 3:2, 3:16, 4:2, 6:17, 6:19, 6:22, 6:24, 7:1 behavior 15:4, 53:17 being 8:1, 11:2, 21:7, 25:3, 27:18, 31:5, 32:17, 32:18, 34:15, 37:13, 38:3, 38:10, 38:13, 41:16, 48:4, 48:5, 53:5, 56:3, 63:4, 64:7, 65:7, 69:23 belief 37:1 believable 37:23, 46:12, 47:19, 48:6, 48:7, 48:9, 48:10 believe 15:16, 20:25, 30:14, 31:3, 36:5, 36:23, 38:2, 39:12, 46:9, 49:18, 50:25, 51:22, 58:5, 58:6,</p>	<p>60:1, 64:18, 66:1, 66:7, 68:6, 70:19, 70:23, 77:18, 77:20, 77:23, 79:5, 79:9, 79:21, 80:1, 80:25, 81:15, 82:24 believed 36:24, 46:14, 73:11, 81:1 benefit 23:20 beth 6:18 between 16:19, 23:18, 54:5, 54:10, 55:11, 60:22, 60:24, 78:8, 79:22, 82:23 beyond 27:4 big 41:11, 46:17, 67:25 bigger 21:3 birch 18:12 bit 82:1 blow 28:17 bodies 61:7 body 62:7 both 15:9 box 3:6 breach 25:18, 25:19, 37:4, 37:6, 67:2 breached 29:5</p>
---	--	---	--

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>break 13:12, 13:14, 13:15, 13:19, 42:25 breaks 13:11 brescia 15:10 briefing 26:2, 26:3 briefings 26:8 briefly 16:2 bring 41:22, 43:14, 50:3, 56:10 brooms 68:4 brought 14:2, 21:7, 54:3 buckler 4:12, 6:10 building 33:21, 59:6, 61:25, 62:12 bunk 61:8</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>c-building 64:1 c-house 63:23, 64:1, 67:5, 67:18, 67:19, 68:2, 77:11 cadet 16:10, 17:2, 45:11, 45:21, 54:6, 54:7, 54:8, 73:19, 73:20, 73:21 cadets 54:2, 73:24 call 7:23, 7:25,</p>	<p>54:4, 59:12, 62:8, 64:19, 64:23, 65:2, 65:25, 66:1, 66:4, 81:21, 81:23 called 7:12, 26:2, 33:8, 33:13, 33:20, 53:2, 65:14 came 31:6, 33:6, 45:21, 65:25, 81:23 camera 10:22, 55:20 cameras 55:12, 55:17, 55:19, 55:23 can't 9:25, 35:23, 41:25, 55:20, 67:1 capitol 4:5 captain 18:12, 32:3, 53:25, 54:1 care 17:20, 33:11 case 1:6, 6:6, 8:6, 11:5, 58:22, 84:14 cause 37:9 caused 77:18, 77:19 causing 24:12 cell 55:19, 67:24, 71:18, 77:2 cells 30:13, 61:5 census 62:2, 62:7</p>	<p>center 3:5, 3:11, 6:16, 6:19, 6:22, 7:18 central 6:9, 9:2, 17:7 certain 28:7, 50:6, 57:4, 78:16 certainty 78:17 certificate 84:1 certified 2:4, 2:5, 84:3 certify 84:8 chain 24:23, 31:13 chance 28:22 change 30:20, 33:1, 62:19, 66:4, 67:8 changed 63:8 charge 18:17 chargers 41:11 check 30:13, 39:7, 55:23, 62:14 checked 39:11, 42:8, 42:20 checking 61:8 checks 42:12, 42:13 chemicals 68:4 chit 63:21, 64:4, 64:11, 64:13 chits 64:12</p>	<p>choice 8:3 chose 70:18 circumstance 68:14 circumstances 43:17, 47:24, 48:1, 48:2 civil 8:22 clarification 20:16, 39:3 clarify 65:6 clarifying 38:15 classification 17:5 clean 67:22 cleaning 68:5 clear 8:5, 8:10, 8:11, 10:3, 10:9, 10:17, 11:9, 12:9, 13:9, 14:10, 17:10, 18:19, 23:9, 28:15, 31:17, 34:22, 35:4, 36:7, 53:11, 54:17, 59:15, 62:10, 81:17 cleared 63:6 clerk 59:13, 59:14, 62:8 close 45:2, 56:2 closed 9:5 closet 33:6, 33:7, 34:16, 35:16,</p>
--	--	--	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>35:17, 36:19, 37:11, 37:14, 39:10, 40:10, 40:11, 40:15, 41:3, 41:6, 41:14, 41:17, 41:23, 42:1, 42:8, 43:15, 44:6, 44:16, 46:11, 49:17, 55:10, 55:14, 55:17, 65:9, 68:1, 68:3, 68:7, 68:11, 68:19, 68:25, 69:1, 69:19, 70:11, 70:14, 70:25, 71:5, 71:9, 71:10, 71:13, 71:15, 71:16, 72:9, 72:14, 72:23, 76:13, 76:14, 76:19, 76:24, 77:1, 77:6, 79:7, 79:18, 80:7, 80:13, 81:2, 81:4, 81:14 clvs 4:12, 6:10 coastal 16:2 coats 41:9 code 75:13 cognitive 15:3 college 15:9 come 8:7, 9:9, 12:1, 17:23, 43:1, 66:1 comes 11:17, 18:1, 27:9, 66:20,</p>	<p>66:25 coming 8:3, 35:16, 53:1 command 24:23, 44:11 commission 84:19 communicate 11:8 community 20:15, 20:19 compare 59:11 complaint 51:23 complete 10:20, 59:15 computer 11:11, 11:23, 11:24 concern 14:23, 29:1, 29:8, 29:9, 31:9, 31:10 concerns 22:1 concluded 83:22 condition 18:1 conduct 75:13 conducted 57:22, 60:9, 60:13, 60:15, 61:3 confirm 31:3 confusing 35:6, 38:16 congratulations 16:15 connecting 61:7 connection 12:22 consecutive 31:7</p>	<p>considered 16:18, 59:15 consistent 51:15 contact 21:16, 21:19, 23:24, 78:8 continue 31:15, 36:2 continued 4:1 continues 31:12 continuing 56:15 control 63:22, 64:5, 64:13, 64:15 controls 17:17 conversation 21:23, 21:25, 36:14, 36:15, 36:20, 40:16, 40:18, 40:25, 45:11, 48:5, 51:17, 54:10 conversations 32:9, 45:24 coordinator 23:16, 23:21, 23:25, 35:1 correct 8:17, 15:24, 16:24, 17:14, 24:7, 24:8, 24:15, 30:10, 30:16, 30:18, 30:19, 31:20, 45:19, 52:5, 53:19, 53:24, 64:20, 68:8, 74:13, 75:10, 75:16, 77:25, 81:19, 84:9 correctional 16:10, 16:11, 24:14</p>	<p>corrections 14:20, 15:23, 78:24 could 11:5, 27:25, 30:20, 33:14, 35:6, 43:13, 44:1, 47:10, 47:24, 60:3, 63:2, 65:21, 68:10, 83:10 couldn't 33:3, 33:4, 35:14, 35:15, 72:15, 83:5, 83:7, 83:8 counsel 6:13, 28:10, 29:17, 84:13 counselling 74:5 count 25:10, 25:11, 59:1, 59:3, 59:5, 59:6, 59:9, 59:12, 59:13, 59:15, 60:1, 60:6, 60:7, 61:3, 61:6, 61:16, 61:19, 62:2, 62:5, 62:7, 62:8, 62:10, 62:11, 62:12, 62:20, 63:5 counting 59:7, 59:10, 61:23, 61:24, 62:4 counts 59:10, 59:14, 59:20, 59:21, 60:9, 60:22, 60:24, 62:3, 62:7 county 84:5 course 42:23, 43:12,</p>
--	---	--	--

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>64:15 court 1:1, 6:5, 7:3, 7:6, 8:13, 9:15, 10:15, 23:20, 84:1 covers 59:6 cpr 78:10 crew 68:15 criminal 8:23 crr 1:24, 84:4 csr 1:24, 84:4 cst 1:15, 83:22 currently 16:12, 17:8 cycle 31:8, 31:12</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>daily 25:25, 26:20, 26:23 date 6:8, 25:12, 25:14, 64:21, 65:7, 72:10 day 26:1, 26:10, 36:11, 36:12, 40:6, 55:21, 59:19, 61:22, 61:25, 62:13, 62:15, 65:3, 65:10, 65:11, 65:17, 65:18, 65:24, 68:22, 70:9, 72:12, 72:14, 77:10, 77:14, 80:5, 80:10, 80:11, 84:17</p>	<p>day-to-day 17:18, 17:19, 25:14 dealings 55:8 deatur 3:7 december 15:20 decides 19:15 def 5:12, 5:13, 5:14, 28:1, 50:3, 57:1 defendant 1:9, 3:16, 7:2, 8:6 define 22:5 degrees 15:7, 15:12 department 14:19, 15:21, 15:22, 21:4, 27:9, 78:18 depend 47:23 depending 18:5, 19:12, 64:10 depends 18:12, 19:4 deponent 4:2 depos 4:11, 4:13, 6:11, 7:5 deposed 8:19, 9:13 deposition 1:12, 2:2, 5:10, 6:3, 6:11, 9:10, 10:24, 11:1, 11:8, 11:18, 11:25, 12:10, 12:16, 14:3, 14:5,</p>	<p>14:15, 14:17, 14:21, 28:8, 50:7, 57:5, 83:22, 84:7 describe 59:1 description 66:19, 66:20 device 11:12, 11:13, 11:15, 12:10 devices 11:21 diagnostic 24:5, 56:25, 59:23 diagnostics 17:5 diamond 1:5, 6:4, 6:17, 6:20, 6:22, 7:19, 19:18, 19:19, 19:23, 20:2, 20:10, 20:14, 20:18, 21:7, 21:16, 21:20, 21:24, 21:25, 22:18, 23:10, 23:18, 34:12, 34:20, 36:16, 36:18, 39:23, 44:17, 46:11, 52:4, 55:12, 58:23, 65:8, 67:4, 67:11, 67:15, 70:1, 70:16, 72:22, 73:1, 73:3, 73:4, 76:12, 76:19, 76:24, 76:25, 79:6, 79:10, 80:7, 80:14, 81:3 diamond's 22:5, 22:10, 77:2 diego 3:10, 6:21</p>	<p>different 18:4, 26:12, 26:15, 26:16, 31:17, 33:11, 49:1, 49:2, 59:14, 62:17, 63:16, 63:17, 63:20, 69:16 differs 62:18 directed 13:6 directing 29:12 direction 84:11 directly 24:24 disadvantage 27:10 disagreement 73:25 disbelief 37:2 disbelieve 69:15, 69:17, 71:22, 73:2, 73:5, 73:8, 73:10, 81:15 disciplinary 29:7 discipline 25:16, 25:17, 27:14, 27:19, 27:21, 29:2, 31:14, 31:16 disciplining 29:21, 31:4 discuss 32:1 discussed 51:12 disrespectful 74:7 distract 12:1, 12:15 district 1:1, 1:2, 6:5,</p>
--	--	--	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

6:6 disturb 12:13, 12:17, 12:19 division 1:3, 6:6 document 28:5, 28:7, 28:19, 28:20, 28:25, 50:6, 57:4 documenting 30:15 documents 14:2 dog 24:9 doing 21:22, 33:1, 33:10, 43:24, 61:6, 61:7, 62:7 done 38:6, 39:15, 39:21, 39:22, 59:9, 59:17, 59:18, 61:20, 61:23, 62:20, 80:19, 80:20 door 9:5, 30:11, 42:1, 42:3, 42:5, 42:6, 55:18, 55:21 dorm 68:5 doubt 36:6 down 9:16, 9:25, 29:19, 31:13, 54:21, 57:13, 62:5 due 19:14, 26:14, 29:24 duly 7:10, 7:12 during 9:9, 11:17,	12:16, 18:21, 19:9, 20:25, 21:1, 23:4, 25:22, 36:15, 60:9, 60:22, 62:15, 65:10, 66:2, 66:3, 74:20 duties 36:3 duty 25:17, 30:5, 62:22 <hr/> <p style="text-align: center;">E</p> <hr/> each 9:18, 26:1, 26:2, 26:12, 42:11, 67:7 eastern 43:1 educational 15:1 effectively 25:21 either 32:5, 33:2, 36:11, 65:11, 72:12, 77:22 electronic 11:21 elimination 23:23 elizabeth 3:3 else 11:9, 11:14, 12:1, 14:16, 34:18, 38:20, 39:18, 39:20, 55:25, 56:6, 74:23, 75:2, 75:4, 76:1, 76:7, 83:17 elsewhere 16:1 emergency 61:3, 61:16,	61:17, 61:19 employed 15:19, 84:13 employment 15:18 enact 61:12 end 28:17, 43:4, 83:20 enforces 17:18 engaging 46:7 enough 25:9, 43:9, 71:9 ensure 17:19, 17:24, 27:11, 61:25 entail 25:3 entered 6:23 entirely 36:25 entirety 36:25 equipment 42:12, 63:5, 63:7, 63:20, 64:2 escaped 61:11, 61:12 esquire 3:3, 3:4, 3:10, 3:17, 4:3 even 20:10, 45:22, 73:14 evening 65:19, 65:20 event 61:10, 78:10 events 64:20 ever 8:19, 8:22,	22:1, 27:14, 31:21, 31:24, 32:19, 37:12, 37:16, 38:8, 39:23, 40:2, 41:13, 41:16, 43:13, 46:3, 46:6, 54:23, 54:25, 55:3, 55:6, 55:23, 58:7, 69:5, 72:22, 77:5 every 10:2, 26:10, 60:15, 60:16 everyone 56:9 everything 9:16, 12:19, 24:25 evidence 70:18, 70:24 exact 35:11, 53:25, 66:21, 66:23, 81:22 exactly 35:10 examination 5:2, 5:3, 5:4, 7:14, 58:18, 80:23 examined 7:13 exchange 29:25, 30:1, 30:4 exchanged 21:25 exchanges 31:2 excuse 69:1 exhibit 5:12, 5:13, 5:14, 28:8, 28:11, 29:15, 31:19, 50:5,
---	---	--	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>50:7, 50:21, 57:3, 57:5 exhibits 5:10 expected 27:11 experienced 37:12, 37:16 expires 84:19 explain 37:3, 63:2, 73:18 explanation 22:8, 46:10, 81:2 express 22:1 expression 22:6 extensive 61:6 extent 20:1, 21:22 extenuating 43:17, 68:14</p>	<p>49:8 feelings 49:13 feels 62:13 female 21:9 few 9:13, 56:17, 58:23, 80:21 field 73:23 figure 12:24 file 27:19 filed 51:23 filing 62:5 financial 46:7, 84:15 find 33:3, 33:4, 35:15, 35:21, 46:10, 46:21, 69:3, 71:21, 72:4, 72:15, 72:20, 72:21, 72:25, 73:6, 73:13, 79:3, 83:5, 83:11 finding 69:2 findings 78:23 fine 7:25 finish 9:20 finished 56:3 fired 49:15 first 7:12, 7:20, 9:15, 18:10, 20:3, 20:6,</p>	<p>20:9, 23:24, 29:2, 35:2, 36:16, 45:21, 58:9, 59:9 five 59:18, 59:19, 59:21, 66:3 flat 48:12 fleisher 3:4, 5:3, 6:15, 6:16, 7:15, 7:17, 22:20, 27:25, 28:2, 28:12, 28:13, 29:18, 29:20, 42:23, 43:8, 44:22, 45:7, 47:2, 47:9, 47:25, 49:14, 50:3, 50:9, 50:17, 50:19, 52:6, 52:8, 52:14, 52:16, 52:18, 54:20, 54:22, 56:2, 56:16, 57:1, 57:8, 57:12, 57:14, 58:10, 58:15, 67:12, 70:20, 71:23, 72:2, 74:14, 75:8, 75:17, 78:1, 79:12, 79:24, 80:18, 80:21, 80:24, 82:14, 83:13, 83:18 floor 67:21, 67:25 floors 67:22 focus 15:5 focused 55:18, 55:21 focusing 18:2</p>	<p>folks 69:13 follow 30:7, 78:25 follow-up 58:24 follow-ups 80:22 followed 17:25 follows 7:13 forces 78:10 foregoing 84:7, 84:8 form 22:12, 29:6, 44:21, 45:4, 46:24, 47:5, 47:21, 49:10, 49:11, 58:3, 58:12, 62:11, 71:23 formal 61:23 forward 26:6 found 35:16, 48:8, 71:11, 73:1, 73:4, 73:8, 73:14, 73:15, 76:12, 77:20 four 19:3, 60:16 frame 22:24 frequently 21:19 friendly 53:5 front 74:3 fto 73:22 full 8:12, 9:19,</p>
<p style="text-align: center;">F</p> <p>face 26:15 facilities 16:25 facility 17:18, 25:15, 25:21, 45:17, 45:21, 61:13, 62:9 fact 71:7, 71:8, 81:12 failed 77:9 falsely 75:20 familiar 19:19, 19:21, 19:22, 56:20 feel 49:6, 49:7,</p>			

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>74:3 further 34:18, 39:8, 40:2, 40:16, 40:22, 40:25, 80:17, 80:23</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>gave 14:7 gdc 14:20, 15:19, 15:22, 15:25, 16:6, 17:1, 24:16, 48:16, 49:9, 78:15 gdcp 17:4, 17:11, 18:3, 18:11, 19:10, 19:24, 21:18, 25:23, 48:22, 49:9, 60:10, 60:22 gender 21:5, 22:5 general 4:4, 32:15 generally 60:23, 66:25, 67:17 georgia 1:2, 3:7, 3:20, 4:4, 4:6, 6:6, 14:19, 15:8, 15:22, 17:4, 24:4, 56:24, 59:23 getting 12:14, 18:19, 77:22 gist 35:12, 38:13 give 9:18, 10:2, 10:15, 10:20, 22:9, 26:3, 26:4, 26:21, 27:10, 28:21,</p>	<p>31:8, 36:1, 40:20, 40:21, 50:14, 53:9, 59:12, 77:19, 77:21, 83:6 given 18:25, 23:17, 29:4, 30:19, 38:3, 68:16, 68:17, 84:9 giving 10:15, 51:2, 77:17, 77:22, 78:10 go 9:13, 10:8, 12:25, 13:7, 13:12, 13:18, 14:13, 15:17, 17:22, 19:25, 21:11, 22:15, 26:7, 26:12, 29:18, 30:15, 31:13, 36:2, 39:7, 41:13, 42:12, 42:14, 42:15, 42:18, 43:1, 43:20, 43:21, 44:6, 44:11, 44:23, 49:18, 52:6, 52:14, 56:8, 59:8, 61:4, 68:1, 68:7, 68:10, 70:5, 70:9, 70:11, 72:2, 77:2, 79:3, 82:18 goes 61:13 going 13:3, 14:11, 21:2, 28:4, 33:3, 36:18, 42:24, 43:3, 44:16, 46:23, 47:4, 50:15, 52:9, 52:10,</p>	<p>54:10, 56:11, 73:22, 82:1, 83:3, 83:19 good 6:15, 7:16, 58:20 great 8:12, 9:24, 13:3, 13:11, 13:22, 42:24, 43:9 ground 9:13 guess 7:20, 20:14, 47:23, 51:19, 54:4, 57:2</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>hallway 21:21, 65:22 hand 7:9, 63:7, 84:17 hand-to-hand 63:10 handing 53:15 handle 33:14 hands 77:24, 78:6 hang 41:9 happen 12:22, 62:16, 78:11, 80:2 happened 23:4, 30:9, 30:22, 40:7, 65:21, 70:14, 80:2 happening 39:6 happens 59:16, 61:1 he'll 40:23</p>	<p>head 9:25, 16:3, 23:13, 24:17, 67:1, 78:13 health 15:5 hear 20:5, 20:8, 20:13, 20:20, 23:3, 23:15, 24:9, 45:23, 46:1, 46:3, 46:6, 82:6, 82:7, 82:10, 82:15 heard 20:9, 20:17, 22:21, 22:22, 23:1, 23:5, 23:17, 34:16, 34:19, 41:16, 45:9, 46:5, 58:9, 64:16, 79:1 hearing 50:11, 82:9 held 16:8 help 27:22, 32:6, 32:16, 43:23, 49:25, 71:12 helping 36:18, 72:24 here 6:2, 8:2, 8:17, 56:19 hereby 84:7 herein 7:12 hereunto 84:16 hey 21:21, 31:9, 53:3 high 44:10, 69:18</p>
--	--	---	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>history 15:18, 22:10 hold 45:11, 81:11 honest 10:20 honestly 27:5, 35:23 hook 47:14 hopefully 12:22, 24:11 hour 42:24, 66:2 hours 60:15, 60:16, 60:19, 60:23 house 55:19, 62:20 housekeeping 67:24 housing 63:21, 64:3 however 6:23, 64:2 hugging 53:6, 53:14 hugs 53:15</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>identification 28:8, 50:7, 57:5 identifies 22:7 identify 21:4, 21:5 ids 61:7 ii 16:11 illinois 2:7, 84:6, 84:23 immediate 25:1 important 9:17</p>	<p>improper 29:25 improve 32:5 inappropriate 55:3, 58:1, 58:7 incident 23:4, 29:23, 29:24, 31:18, 34:4, 34:8, 36:8, 38:1, 38:21, 39:6, 39:15, 39:21, 39:24, 40:3, 41:1, 41:18, 49:17, 49:21, 49:24, 51:12, 51:18, 51:20, 51:22, 51:25, 52:2, 52:3, 55:11, 61:20, 65:7, 65:13, 66:8, 66:10, 66:12, 66:13, 67:10, 68:22, 70:4, 74:4, 74:24, 74:25, 76:8, 76:9, 78:20, 80:11, 81:10, 82:24 incidents 34:21 included 51:18, 51:21 incorrect 36:17, 72:18 incumbent 48:25 indicate 77:8 indicated 58:21, 64:18, 68:6, 77:23 indicates 66:10 indignant 75:24</p>	<p>inform 25:18, 33:8, 33:13 information 8:8, 26:4, 26:5, 63:9 informed 34:9, 39:5, 39:6 initial 33:19, 36:20, 40:1, 40:18, 66:4 initially 19:2, 34:19, 70:6 inmate 61:1, 61:2, 65:8, 66:15, 67:4, 67:11, 68:6, 70:1, 70:15, 72:22, 73:1, 73:3, 76:12, 76:19, 76:24, 79:6, 79:10, 80:7, 80:13 inmates 77:24, 78:6 inquire 79:4 inside 26:12, 30:10, 30:13, 40:9, 40:15, 44:13, 55:14, 55:19, 70:11, 71:10 inspect 70:10 instance 37:19, 41:21, 43:19, 44:5, 45:10, 53:23, 61:2 instead 31:9 instructed 39:18, 39:19,</p>	<p>77:4 instruction 29:4, 30:19 instructions 13:23 interact 25:23, 45:19 interacted 26:19, 26:25, 32:19 interaction 54:5, 74:10, 74:21, 77:20 interactions 26:9 interest 84:15 interrupt 14:8, 14:13, 60:2 interview 51:2, 51:8, 57:22, 58:6 interviewed 38:8, 38:14 investigated 51:24 investigation 37:25, 38:6, 38:9, 38:22, 49:20, 49:22, 51:12, 78:19, 78:21, 79:2 involving 52:3 issue 32:7, 32:13, 36:3, 43:19, 64:14, 83:5 issued 30:23 issues 12:22, 17:22, 64:10</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>jacket 36:19, 36:22,</p>
---	---	--	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>37:10, 37:21, 46:19, 46:22, 47:11, 68:21, 68:25, 69:3, 69:5, 70:2, 71:11, 71:12, 71:21, 72:5, 72:16, 72:20, 72:21, 72:25, 73:2, 73:5, 73:6, 73:8, 73:12, 73:13, 81:13 jacking 53:7, 53:15 jackson 20:10 jar 49:25 job 1:21, 17:23, 18:19, 25:8 johnson 51:1, 51:3, 57:20, 78:23 junky 67:25</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>kane 84:6 keep 10:22, 25:20, 64:11 kentucky 15:11 key 42:12 keys 42:15, 49:2, 63:2, 63:4, 63:7, 63:9, 63:19, 64:1 kind 13:23, 24:20, 25:20, 40:22, 41:6, 54:4 knew 26:17, 34:15,</p>	<p>80:10, 81:7, 81:8 know 8:2, 9:10, 10:6, 11:18, 12:6, 13:14, 19:17, 19:23, 20:1, 24:16, 26:21, 27:11, 27:18, 27:19, 27:20, 28:22, 30:22, 33:21, 34:5, 34:10, 34:11, 34:17, 35:4, 36:24, 37:25, 38:2, 38:16, 39:11, 39:13, 40:6, 40:23, 44:9, 44:25, 45:8, 45:10, 45:17, 45:25, 47:7, 47:8, 48:4, 48:15, 48:17, 48:19, 48:20, 49:4, 50:11, 50:24, 55:22, 55:25, 60:21, 62:23, 64:24, 66:17, 66:19, 67:6, 68:17, 69:2, 69:4, 69:19, 69:20, 70:14, 70:17, 72:10, 73:12, 74:5, 74:8, 74:9, 74:17, 74:25, 75:4, 75:5, 76:5, 76:6, 76:7, 77:16, 78:5, 78:11, 78:20, 78:23, 79:14, 79:17, 79:19, 80:3, 80:9, 80:15, 81:7, 82:18, 82:22, 83:2</p>	<p>knowledge 45:18, 46:8, 55:16, 68:20, 68:24, 70:25, 77:13, 77:15, 78:14, 80:12 known 44:24, 45:2, 45:13 kurt 18:7</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>lachisa 24:1, 35:3, 38:4, 38:11, 38:17, 38:18, 38:19, 50:2 last 16:14, 17:6, 21:11, 21:16, 79:1 late 31:7, 31:10, 31:11 later 34:14, 36:11, 65:19, 65:20 law 3:5, 3:11, 6:16, 6:19, 6:22, 7:18, 10:16 lawson 18:10 lawsuit 24:6 lead 18:8 learning 31:1 least 59:18, 59:19 leave 67:18, 76:19, 76:24, 77:1, 77:4 leaves 64:13</p>	<p>leaving 49:6, 49:9, 68:21 led 31:18 left 48:16, 48:17, 48:20, 48:22, 78:15, 78:17, 78:18, 82:18 less 61:23 let's 28:1, 43:1 letter 29:1, 29:8, 29:9, 30:23, 31:8, 31:10, 31:18 level 19:20, 21:3, 25:6, 25:7 liaison 16:19 liar 53:20 lie 74:11 lied 54:13, 54:18, 73:14, 73:15, 73:19, 74:24, 75:3, 76:2 lieutenant 7:22, 16:11, 16:23, 17:4, 17:13, 17:16, 17:17, 17:24, 18:3, 18:5, 18:8, 19:10, 21:18, 24:7, 24:21, 25:6, 25:7, 25:8, 25:18, 25:23, 26:11, 26:15, 29:11, 32:3, 32:10, 33:12, 36:2, 54:1</p>
--	---	--	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>little 35:6, 41:4, 52:10, 81:25 littrell 3:3, 6:18 living 63:17 llc 3:18 lock 42:3, 44:13 lockdown 61:14 locked 35:17, 36:16, 37:8, 37:10, 37:13, 39:10, 40:8, 40:12, 68:18, 79:18 long 3:17, 5:4, 7:1, 13:4, 13:12, 33:23, 35:18, 35:20, 35:22, 35:23, 44:21, 45:4, 46:21, 47:1, 47:21, 49:10, 56:6, 58:3, 58:12, 58:17, 58:19, 58:21, 67:16, 71:3, 72:6, 74:22, 75:9, 75:21, 78:4, 79:15, 80:4, 80:12, 80:16, 80:19, 80:20, 80:25, 82:1, 82:8, 83:15 longer 18:11 look 27:18, 28:5, 28:22, 28:23, 36:18, 56:4, 71:12, 77:18, 78:25, 82:25 looked 31:18</p>	<p>looking 36:22, 37:10, 37:21, 46:18, 80:18, 81:13, 83:10 looks 41:5 lot 12:18, 20:14, 20:18 lying 48:12</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>m-c-c-a-l-l 8:15 macon 1:3, 6:6, 17:7 made 13:7, 25:10, 58:23, 77:1, 83:7 main 3:19, 63:22, 64:4, 64:13, 64:15 maintenance 43:19, 43:20, 43:21, 43:25, 44:2, 44:5, 68:8, 68:12, 68:13, 68:14, 68:15 major 19:15, 33:8, 38:25, 39:4, 40:5, 40:20, 40:21, 53:4, 53:9, 54:12, 54:13, 54:18, 73:19, 74:6, 74:17, 75:3, 75:4, 75:19, 76:4, 76:10 major's 39:1 make 8:5, 9:22,</p>	<p>13:1, 13:4, 13:20, 14:10, 17:10, 18:19, 25:8, 25:12, 25:14, 26:16, 42:15, 42:16, 56:5, 59:11, 62:23, 67:20, 67:24, 81:14 makes 36:4 making 17:20, 29:16, 30:14, 65:21 male 21:9 management 17:20 manager 7:24, 16:12, 16:13, 16:17, 17:8, 34:25 many 18:25, 20:21, 62:23, 62:24, 69:8 marc 39:2 march 1:14, 6:8, 84:18 mark 52:7, 57:2 marked 28:7, 28:11, 29:14, 50:5, 50:6, 57:4 masters 15:3, 15:9, 15:14, 15:15 match 62:9 matt 4:10, 27:25, 50:3, 52:6, 52:9, 52:14, 52:17, 54:20, 57:1, 57:10,</p>	<p>57:12 matter 6:4, 7:19, 8:9, 8:23, 63:12 maybe 19:4, 21:21, 29:5, 45:13, 66:2, 66:4, 71:18, 71:19, 81:8 mccall 1:13, 2:3, 5:2, 5:10, 6:4, 6:25, 7:11, 7:16, 7:21, 7:22, 7:25, 8:2, 8:14, 15:2, 19:17, 20:17, 28:3, 28:7, 28:11, 28:14, 29:10, 29:14, 29:16, 29:21, 43:10, 43:13, 44:23, 50:5, 50:6, 50:20, 52:9, 52:19, 54:23, 56:3, 56:17, 57:2, 57:4, 57:15, 57:25, 58:16, 58:20, 80:22, 83:14, 83:15 mccumber 56:21, 57:19 mcgovern 3:18 mean 15:14, 16:17, 18:16, 18:20, 27:6, 27:8, 29:25, 31:25, 51:21, 53:22, 60:2, 74:7 mediate 54:3 medical 30:11 meet 45:16, 65:9</p>
--	---	---	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>memory 30:10, 49:25, 51:15, 51:19, 53:23, 69:17 mental 15:5 mentioned 24:2, 34:7, 41:3, 81:3 merit 2:5, 39:8 messages 12:14, 58:8 met 20:3, 20:6 middle 1:2, 6:6 might 8:7, 12:15, 27:22, 80:21 military 15:8 mind 31:6, 66:20, 66:25 minute 28:21, 52:7 minutes 42:25, 47:3, 56:4, 56:9 missing 61:10, 61:11, 61:13 mix 21:8 mobile 11:12, 11:13, 11:14, 12:10 mode 61:14, 61:17 moment 12:3, 37:3, 44:1, 46:15, 76:9 monitor 6:9 montgomery 3:13</p>	<p>mop 67:21 mops 68:4 more 47:3, 56:17, 58:15, 69:14 morning 6:15, 7:16, 8:2, 40:6, 58:20, 65:11, 66:5, 66:7, 72:13, 81:21, 82:4 move 24:12 moved 19:11, 48:23 much 12:21, 17:17, 24:11, 58:16, 69:23, 75:25 multiple 26:20, 26:22 muted 82:13 myself 69:24</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>name 7:17, 8:13, 35:2, 39:1, 58:20 named 56:20 nature 60:17, 60:18 navigate 12:24 necessarily 36:24, 62:10 need 12:3, 13:14, 19:13, 32:6, 41:10, 42:19, 46:18, 62:14, 68:5</p>	<p>needed 27:3, 27:7, 39:9, 43:23, 44:6, 53:4, 68:15 needs 26:6, 30:17, 40:22 neither 84:13 never 22:18, 28:15, 55:5, 68:18, 70:22, 71:11 new 48:23 newer 73:24 next 30:5, 36:12 night 18:6 nods 9:25 none 14:25 normally 62:16 notarial 84:17 notary 2:7, 84:1, 84:5, 84:23 notation 30:17 notes 14:3, 56:5, 80:19 nothing 11:25, 78:17 notice 2:3 notifications 12:15 notified 17:25, 44:11 notify 44:9, 44:15</p>	<p>november 84:19 number 19:5, 59:12, 66:17, 78:11 numbers 59:11, 62:9</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 10:11, 10:14 object 22:12, 46:23, 47:4, 47:21, 49:11 objected 22:15 objection 13:7, 44:21, 45:4, 49:10, 58:3, 58:12, 67:12, 70:20, 71:23, 71:25, 72:1, 74:14, 75:8, 75:17, 78:1, 79:12, 79:24 objections 13:5 obtain 15:12, 63:2, 64:8 occur 59:22 occurred 61:15, 66:13, 68:22, 79:22 occurs 62:17 offender 17:20, 19:23, 21:4, 21:24, 23:18, 25:11, 25:17, 31:14, 33:6, 34:7, 34:9, 34:10, 34:12, 34:15, 34:20, 37:8,</p>
---	--	---	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>37:13, 41:16, 41:23, 43:14, 43:21, 43:22, 43:23, 44:6, 44:13, 44:16, 45:15, 45:20, 46:11, 52:4, 55:7, 55:8, 59:5, 61:5, 61:9, 61:11, 61:12, 61:13, 62:1, 68:3, 68:17, 68:19, 71:12, 76:25, 77:3, 78:9, 79:19 offenders 16:20, 17:21, 18:24, 20:24, 26:17, 30:13, 32:20, 41:13, 45:3, 45:12, 45:24, 46:4, 46:7, 53:6, 53:7, 53:14, 53:16, 61:4, 62:23 office 4:4, 9:2, 9:3, 37:8, 37:14, 40:7, 42:14, 46:17, 46:20, 47:11, 47:17, 53:2, 66:16, 69:6, 69:9, 70:5, 70:10 officer's 36:19, 40:11, 40:15, 41:3, 41:6, 41:9, 41:13, 41:17, 66:16, 68:7, 68:11, 69:6, 69:8, 70:5, 70:10, 71:4 officers 18:24, 19:1, 19:4, 19:5,</p>	<p>25:10, 25:13, 31:22, 31:23, 32:4, 32:8, 32:25, 36:2, 42:18, 62:17, 63:14, 73:24, 77:5, 77:23 official 59:19, 62:2, 62:3, 62:11 often 19:12, 25:22, 59:17, 60:15, 62:15 oic 18:9, 18:15, 33:9, 53:2 okay 8:1, 9:9, 11:13, 14:2, 14:13, 16:8, 18:18, 22:18, 28:6, 28:17, 35:18, 35:19, 51:10, 52:12, 56:9, 56:10, 58:25, 61:21, 71:25, 82:12, 82:17, 83:16 once 13:6, 21:21, 36:1, 59:13, 59:16, 62:4, 63:6, 73:5 oncoming 30:2 one 9:16, 10:14, 21:1, 21:13, 27:18, 29:1, 30:1, 30:6, 30:25, 32:25, 36:25, 41:17, 43:4, 50:15, 50:24, 50:25, 57:7, 59:5, 59:6, 59:7, 59:8, 64:4,</p>	<p>66:2, 69:10, 69:11, 69:12, 69:14, 80:9, 80:10, 80:11 only 13:16, 30:25, 43:25, 80:9, 80:10 open 71:9 operations 17:19, 25:15 opinion 75:6, 75:15, 76:22 order 30:3 orderlies 67:7, 67:8, 67:17, 68:1 orderly 67:5, 67:11, 67:15, 67:20, 68:10 ordinary 25:20, 43:22 other 9:18, 9:24, 11:15, 11:21, 14:10, 14:21, 19:14, 20:24, 26:8, 28:16, 31:22, 41:17, 50:1, 50:25, 60:25, 61:22, 61:23, 69:13, 71:7, 72:24, 81:5 others 50:12 otherwise 84:15 out 12:23, 12:25, 15:10, 25:19, 26:3, 26:4, 33:6, 33:7, 35:16, 39:7,</p>	<p>39:11, 48:12, 53:15, 58:11, 62:24, 63:21, 64:4, 64:11, 64:12, 64:15, 79:3 outcome 84:15 outset 8:5 outside 45:14, 45:16, 55:17 over 9:13, 9:17, 28:22, 28:23, 30:5, 33:9, 54:2, 56:5, 56:18, 63:8, 63:23, 64:7, 77:9 owensboro 15:10 own 9:3 <hr/> <p style="text-align: center;">P</p> <hr/> p-r-e-a 23:21 page 5:2, 5:10 pages 1:22 paperwork 30:16, 39:21, 41:10, 42:19, 64:21 park 26:21 part 38:8, 51:11, 58:5, 63:19, 64:6, 67:23 participated 49:21 participating 51:7 particularly 27:12, 37:24,</p>
--	--	---	---

Transcript of Shanita McCall
Conducted on March 22, 2022

99

<p>46:14, 67:6 parties 84:14 party 8:8 pass 58:17 paying 35:24 pending 13:17 people 17:24, 18:4, 28:16, 49:1 permission 41:24, 43:14, 44:7, 68:13, 68:16, 68:17 person 43:25, 44:3, 44:6, 47:20, 61:8, 65:4, 65:15 personal 19:20, 45:15, 55:7, 70:25 personally 22:18, 81:14 pertinent 26:3, 63:8 phone 12:11, 12:13, 33:21, 65:1, 65:2 photographs 55:4 photos 58:2 physical 30:14, 78:8 pictures 58:8 pinpoint 61:5, 61:9 piper 4:3, 6:24, 8:16, 12:24, 13:4, 14:9,</p>	<p>14:21, 22:12, 22:15, 46:23, 47:4, 49:11, 82:10 place 6:12, 25:15, 29:3, 36:13, 41:8, 42:24, 55:12, 59:4 places 40:9, 40:10 plain 16:3 plaintiff 1:6, 3:2, 6:17, 6:20, 7:19 planet 4:11, 4:13, 6:11, 7:4 play 50:9, 52:9, 57:9 played 50:16, 52:15, 57:11 please 6:13, 7:6, 7:9, 8:12, 9:10, 10:2, 15:18, 28:1, 28:12, 50:4, 50:5, 50:11, 50:18, 52:7, 52:17, 57:2 pod 62:24, 63:3, 63:20, 67:15 pods 63:16 point 23:24, 37:2, 40:21, 40:24, 61:6, 65:10, 73:10 policies 18:1, 25:13, 61:12 policy 29:5, 37:18,</p>	<p>59:18, 63:12, 66:15, 66:17, 66:19, 66:20, 66:22, 66:25, 67:2, 75:12, 78:5, 78:7, 78:9, 78:12 position 48:23 positions 16:8 possibility 72:17 possible 82:3, 82:19, 82:22 post 26:7, 26:12, 29:25, 30:4, 30:20, 31:1, 36:1, 62:19, 62:22, 63:15 posts 63:20 poverty 3:5, 3:11, 6:16, 6:19, 6:22, 7:18 prea 23:16, 23:21, 23:23, 23:25, 34:20, 34:25, 38:4, 51:25, 52:2 prefer 7:20, 7:21, 21:10, 21:14 preliminary 13:23 prepare 14:5 preschool 16:5 present 4:9, 16:9, 26:14, 42:17, 43:18, 54:9, 54:14, 70:17</p>	<p>pretty 17:17, 38:4, 75:25 previously 58:21 priority 36:1 prison 9:2, 17:3, 17:5, 17:8, 20:12, 23:23, 26:16, 44:20, 44:25, 59:3, 59:17, 68:21 probably 32:22, 56:2 problem 13:15, 43:12 problems 64:16 procedure 25:11, 59:4, 62:4 process 29:8, 63:2 profanity 74:18, 75:23 professional 2:6, 74:1, 74:8 professionalism 75:12 professionally 75:7, 75:16 program 11:15, 73:22, 73:24 programming 17:21 prohibits 78:5 promise 56:18 promoted 17:4, 17:7 promotion 16:22 pronoun 21:13</p>
--	--	--	---

PLANET DEPOS

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Transcript of Shanita McCall
Conducted on March 22, 2022

100

<p>proper 17:24, 30:4, 30:20, 31:1</p> <p>protocol 30:7</p> <p>public 2:7, 84:1, 84:5, 84:23</p> <p>pull 27:25, 28:4, 57:1</p> <p>purposes 62:6</p> <p>pursuant 2:3</p> <p>put 37:1, 41:9, 47:10, 59:4, 83:17</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>quad 59:7</p> <p>question 9:21, 10:2, 10:5, 10:9, 13:6, 13:8, 13:17, 75:1, 79:8, 81:6, 82:12</p> <p>questionable 48:11, 48:14, 54:16, 70:24, 71:1, 71:13</p> <p>questioned 71:5, 74:17</p> <p>questions 9:19, 13:4, 13:5, 13:24, 28:23, 52:11, 56:7, 56:18, 58:16, 58:24</p> <p>quote 67:1</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>radio 41:11, 42:16,</p>	<p>63:14, 63:15, 63:21, 63:24, 63:25, 64:2, 64:8, 64:11, 64:14, 64:24, 65:1, 77:9, 77:13, 77:19, 77:22, 82:1, 82:2, 82:24, 83:4, 83:5, 83:6, 83:8</p> <p>radioed 33:5</p> <p>radioing 33:4</p> <p>radios 63:16, 63:18, 64:17</p> <p>raise 7:8</p> <p>random 61:25</p> <p>rank 18:14</p> <p>rape 23:23</p> <p>reach 12:23</p> <p>reading 84:12</p> <p>ready 12:7</p> <p>really 9:17, 20:4, 25:21, 27:12, 37:5, 41:11, 42:19, 48:21, 51:4, 67:23, 81:11</p> <p>realtime 2:5</p> <p>reason 10:19, 19:14, 27:16, 36:6, 37:9, 37:10, 38:5, 41:20, 43:20, 44:1, 69:14, 71:21,</p>	<p>73:2, 79:5, 79:9, 79:16, 79:21, 80:1</p> <p>reasoning 79:18, 79:19</p> <p>reasons 27:17, 81:5</p> <p>recall 29:23, 29:24, 34:2, 34:3, 34:4, 51:2, 51:11, 52:24, 65:24, 69:11, 69:21</p> <p>recalled 31:4</p> <p>received 29:8, 64:19</p> <p>receives 59:14</p> <p>recess 43:5, 56:13</p> <p>recognize 28:19, 28:20, 50:20, 52:19, 57:15</p> <p>recollection 69:25, 72:18</p> <p>record 10:23, 11:7, 14:24, 27:22, 43:2, 43:3, 43:7, 56:8, 56:12, 56:15, 83:17, 83:20, 84:9</p> <p>recorded 11:2</p> <p>recording 5:13, 5:14, 6:2, 43:4, 43:7, 50:4, 50:17, 50:21, 51:14, 52:7, 52:10, 52:16, 53:19, 53:21, 56:15, 57:16, 83:21</p> <p>recordkeeping 62:6</p>	<p>reduced 84:11</p> <p>reference 36:12, 38:22, 45:19</p> <p>referring 23:10, 32:1, 52:3, 53:11</p> <p>regarding 66:11, 74:24, 74:25, 78:19</p> <p>regards 65:13, 76:3</p> <p>registered 2:5, 2:6</p> <p>regular 19:7</p> <p>regularly 42:8</p> <p>related 32:14, 78:9, 84:13</p> <p>relates 48:4</p> <p>relationship 24:18</p> <p>relevant 8:8</p> <p>relieve 33:1, 33:3, 33:5, 42:13, 42:14, 53:2, 62:22, 83:7</p> <p>relieved 30:1, 30:4, 53:1, 63:4, 64:12, 77:10</p> <p>relieves 30:17, 63:11</p> <p>relieving 30:8, 33:2, 33:22, 35:14, 64:7, 82:4, 82:20, 82:23, 83:1, 83:2, 83:3, 83:4</p> <p>remember 19:25, 20:3,</p>
--	--	--	--

Transcript of Shanita McCall
Conducted on March 22, 2022

101

<p>20:21, 20:23, 21:6, 21:7, 21:11, 21:15, 21:23, 21:24, 22:3, 23:12, 23:14, 27:17, 27:23, 30:9, 32:12, 32:14, 35:11, 35:12, 39:1, 39:14, 39:17, 39:19, 39:22, 45:20, 48:11, 48:12, 49:20, 49:22, 49:23, 50:1, 51:4, 51:5, 51:7, 51:16, 51:17, 53:25, 60:11, 64:25, 66:21, 69:23, 72:20, 74:3, 77:12, 77:16, 77:17, 81:22 remembered 52:1 remotely 6:12 report 18:3, 23:17, 32:21, 32:24, 33:19, 36:3, 39:15, 39:21, 40:1, 61:20, 66:8, 66:10, 66:12 reported 1:23, 18:4, 18:6, 18:10, 18:13, 18:21, 22:19, 33:17, 35:7, 38:12, 38:24, 65:7, 70:4, 70:6, 80:10, 81:15 reporter 2:4, 2:5, 2:6, 7:3, 7:6, 7:8, 8:13, 9:15,</p>	<p>20:16, 23:20, 39:3, 84:1, 84:4 reports 49:24 represent 6:14, 7:18, 58:22 representing 6:11, 7:4, 8:17 reputation 44:20, 44:25 requested 84:12 required 63:12 requirement 60:14 responsibilities 17:15 rest 42:18, 42:21 results 78:20 ridley 33:25, 35:8, 36:5, 40:2, 40:3, 40:17, 40:25, 64:19, 65:4, 65:8, 65:10, 65:25, 73:7, 73:9, 76:11, 76:13, 76:18, 76:23, 77:8, 81:21, 82:4, 82:21, 83:9 right 7:8, 16:23, 23:13, 23:22, 24:14, 24:17, 29:15, 29:17, 31:5, 31:19, 33:18, 35:8, 37:21, 46:12, 57:22, 67:1, 78:13 rj 4:12, 6:10</p>	<p>rnr 1:24, 84:4 roles 33:12 room 11:22, 42:18, 42:22 rosters 61:9 rotate 19:12 rotations 26:24 rounds 30:15, 65:22 routine 17:18 rpr 1:24, 84:5 rude 74:7 rules 9:14 rumors 55:6 run 25:21</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>s-h-a-n-i-t-a 8:14 sa 78:23 safety 22:2 said 12:10, 19:21, 20:17, 21:13, 23:21, 24:13, 31:4, 32:11, 33:5, 33:16, 33:20, 34:16, 34:18, 34:21, 34:23, 35:7, 35:17, 35:18, 35:19, 36:14, 36:15, 36:16, 36:21, 37:20,</p>	<p>46:9, 46:13, 49:18, 51:5, 53:3, 53:4, 53:8, 53:20, 54:21, 65:14, 68:9, 69:3, 70:23, 71:1, 71:11, 72:15, 72:24, 73:1, 73:14, 73:18, 77:16, 84:10 same 10:14, 52:23, 59:12, 72:12, 72:14 satcher 3:18 saw 27:22 say 9:16, 14:11, 22:14, 23:9, 26:19, 27:6, 31:25, 33:20, 35:23, 36:17, 36:18, 38:17, 39:4, 41:14, 43:18, 48:2, 48:10, 51:20, 52:2, 55:20, 60:7, 64:6, 70:22, 71:17, 73:15, 77:15, 81:17, 82:25 saying 35:12, 35:25, 45:14, 48:14, 53:10, 54:17, 71:2, 72:20, 81:9 schedule 25:16 schedules 26:23 screen 28:15 seal 84:17</p>
---	--	--	--

Transcript of Shanita McCall
Conducted on March 22, 2022

102

<p>second 50:15, 57:7, 59:10 secondhand 34:17 secure 25:21 security 16:20, 17:22, 25:19, 37:4, 37:6, 67:3 see 19:17, 25:22, 27:19, 28:1, 28:14, 28:15, 28:16, 28:18, 30:22, 32:6, 36:5, 39:7, 42:5, 49:1, 55:23, 56:6, 65:3, 66:14, 71:9 seeing 65:22 seem 37:23 send 55:1, 55:3 sending 58:1 sense 9:22, 13:1, 13:20, 36:4, 81:14 sent 58:7 separate 51:17, 51:20 separately 62:12 sergeant 16:11, 17:2, 24:24, 24:25, 25:1, 25:2, 25:6, 30:7, 30:19, 54:2, 54:5, 54:6, 54:10, 54:13,</p>	<p>73:25, 74:1, 74:12, 74:19, 75:6, 75:11, 75:15, 76:4 sergeants 18:23, 18:25, 19:3, 19:4, 19:6, 25:9 series 13:3 serves 30:10, 53:23 set 59:21, 84:16 several 19:11, 34:23, 40:9 sexual 22:11, 22:19, 46:4, 79:21, 80:2 sexually 79:6, 79:10 shake 77:24 shaking 78:6 shanita 1:13, 2:2, 5:2, 6:3, 6:25, 7:11, 8:14, 29:10 she'd 45:13 sheets 30:11, 62:5 shelf 47:14, 69:6, 69:10, 69:14, 69:18, 70:2 shelves 69:8 shift 18:5, 18:6, 18:9, 18:10, 18:11, 18:25, 19:6, 19:7, 26:1, 33:1, 33:10, 42:11,</p>	<p>48:25, 62:19, 64:8, 64:9, 66:4 shifts 19:5, 19:11, 19:14, 19:16, 49:1, 62:21, 63:1 shorter 69:23 shorthand 2:4, 84:4 should 9:9, 13:7, 30:2, 37:7, 37:9, 41:14, 42:25, 49:19, 54:21, 76:23, 76:25, 77:3, 77:24, 78:8 shouldn't 37:4 show 26:15 shower 67:25 showers 67:22 signature-b7fzp 84:20 signed 26:14, 49:25 signing 84:12 simply 69:17 since 9:12, 15:21, 16:6, 16:25, 37:16 sink 41:8 situation 32:14, 33:14, 34:5, 73:16 situations 26:4, 37:1 size 70:25, 71:4,</p>	<p>71:13, 71:15, 71:16, 71:18, 81:3, 81:13 sleeping 77:5 smith 1:8, 6:5, 7:2, 23:8, 23:19, 24:1, 24:2, 24:13, 24:19, 25:24, 26:9, 27:2, 29:13, 29:22, 30:6, 30:14, 31:4, 31:22, 32:11, 34:14, 34:24, 34:25, 35:3, 35:5, 35:15, 35:21, 36:8, 36:23, 37:20, 38:3, 38:4, 38:10, 38:11, 38:16, 38:19, 44:2, 44:15, 46:6, 47:19, 48:15, 49:9, 50:1, 50:2, 51:23, 52:4, 53:1, 53:5, 53:10, 53:12, 54:8, 54:11, 54:18, 54:24, 55:4, 55:7, 55:11, 58:1, 58:8, 58:11, 58:22, 65:8, 68:21, 69:21, 70:1, 70:15, 70:19, 73:8, 74:2, 74:11, 74:16, 74:20, 75:3, 75:14, 76:2, 76:12, 77:9, 77:10, 78:15, 79:6, 79:10, 79:23, 80:7, 80:13, 81:6, 81:7,</p>
--	--	--	---

Transcript of Shanita McCall
Conducted on March 22, 2022

103

81:18, 81:20, 82:3, 82:20, 83:10 smith's 44:19, 46:10, 75:14, 81:2 smiths 34:23 snack 13:13 social 15:3, 15:5, 15:6 some 8:7, 13:11, 28:23, 52:11, 75:20, 81:25 somebody 22:14 someone 44:8, 44:10, 45:13, 45:14, 45:16, 56:20 something 22:14, 28:4, 29:4, 37:12, 40:22, 46:14, 60:16 sometimes 19:3, 26:13, 64:2, 64:17 soon 24:12, 47:16 sorry 12:3, 12:5, 12:9, 14:8, 14:13, 15:20, 18:17, 19:9, 19:25, 21:11, 22:14, 24:13, 25:7, 28:21, 29:15, 31:14, 34:25, 43:1, 49:8, 51:7, 54:21, 55:1, 57:12, 60:2, 82:17 sort 9:25, 13:22,	26:21, 55:17 soto 3:10, 6:21 sounds 50:24 south 3:19 southern 3:5, 3:11, 6:16, 6:19, 6:21, 7:18 space 41:11 speak 14:16, 36:7, 38:20, 39:23, 40:2, 53:5, 65:12, 65:15 speaking 14:23, 32:12, 32:15, 50:1, 66:25 special 15:5, 50:25, 51:3, 52:23, 57:19, 57:21, 58:6 specific 30:12, 60:12, 60:20, 61:8, 66:24 specifically 60:19 specify 60:3 spell 8:13 spoke 14:7, 14:9, 14:11, 14:14, 32:21, 34:20, 38:16, 54:14, 69:2, 74:1, 77:2 spread 55:6 square 4:5 staff 16:20, 19:13,	20:23, 21:8 start 16:3, 43:7 started 13:25 starting 15:25 state 2:7, 6:14, 8:12, 9:2, 17:3, 17:8, 20:12, 34:1, 84:6 stated 68:25, 70:22, 71:20, 72:4, 73:4, 73:7, 74:11, 75:20, 81:12 statement 34:5, 40:4, 40:20, 53:3, 53:9, 71:10, 71:20, 71:22 states 1:1, 78:7 stating 66:5, 70:1 stayed 17:6 step 31:15 steps 17:25, 29:2, 29:7, 30:2 stewart 74:19, 75:24 still 48:22, 54:7, 73:16 stop 50:10, 50:17, 52:16, 57:10, 57:12 story 71:5 street 3:19 stuart 54:2, 54:6,	74:6 sued 58:23 suite 3:19 supervise 18:22, 25:1, 25:5 supervised 18:23, 24:22 supervisee 24:19 supervision 68:16 supervisor 24:19, 25:1, 25:4, 32:22, 33:13, 38:24, 43:18, 44:10, 76:22, 76:25, 77:3 supervisors 25:18, 32:16 supported 18:23 supposed 17:22, 30:3 sure 17:20, 18:19, 23:5, 25:9, 25:10, 25:12, 25:14, 26:16, 27:24, 29:16, 32:9, 38:2, 38:6, 39:13, 40:11, 42:15, 42:16, 44:24, 47:1, 48:19, 48:24, 49:3, 50:2, 50:14, 50:15, 53:8, 55:20, 56:1, 56:5, 59:11, 61:18, 62:23, 65:12, 65:18, 65:23, 66:7, 67:7, 67:20, 67:24, 74:16,
--	---	---	---

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Transcript of Shanita McCall
Conducted on March 22, 2022

104

82:17, 83:1, 83:2, 83:3 sw 4:5 swear 7:6 sweep 67:22 swiping 12:18 switch 19:13, 19:15, 62:21, 64:12, 64:15 switched 18:11 switches 63:1 sworn 7:10, 7:13	talk 8:4, 9:17, 31:21, 31:24, 31:25, 32:19, 40:19, 45:12, 45:16, 45:17, 45:18 talked 14:20, 32:4, 32:7, 43:15, 45:18, 49:17, 55:10, 81:25 talking 35:5, 36:22, 45:13, 46:3, 52:24, 60:3, 81:18 tall 69:21 tardy 27:18, 31:5, 31:7, 32:14, 48:4, 48:5, 48:6 teachable 37:2 tech 28:4, 28:10, 29:17, 50:14, 57:7 technician 4:10 telephone 64:24, 65:25 tell 14:9, 15:1, 33:4, 35:10, 35:20, 35:22, 39:9, 39:16, 40:14, 41:4, 45:8, 50:10, 57:10, 69:5, 72:7, 72:22, 73:16, 81:8, 83:7, 83:9 telling 31:9, 72:5, 72:19, 81:10 ten 42:25	term 18:15, 18:16 terms 18:20, 24:19 terry 3:17, 7:1, 58:21 testified 7:13, 8:22, 69:13 testify 68:10 testifying 8:25 testimony 10:15, 11:4, 23:3, 66:14, 84:9, 84:10 text 12:14, 54:23, 55:1 th 60:22, 79:7, 79:22, 81:22, 82:5, 82:19, 84:17 thank 7:16, 8:1, 8:16, 8:19, 9:12, 11:11, 11:20, 12:9, 12:21, 15:17, 16:16, 21:15, 28:12, 29:18, 43:11, 51:10, 52:13, 52:17, 56:19, 57:8, 57:10, 57:13, 57:24, 58:16, 61:21, 83:14, 83:15 thanks 9:24, 29:14 themselves 6:14 therapies 15:4 thereafter 84:10	theresa 1:23, 2:3, 7:4, 9:15, 9:25, 84:3, 84:22 thing 9:16, 9:24, 13:16, 24:20 things 10:1, 12:15, 75:20, 75:22 think 8:7, 13:22, 18:15, 23:1, 27:1, 27:4, 27:12, 33:16, 33:25, 34:22, 41:20, 41:21, 44:1, 46:21, 51:25, 53:19, 54:7, 55:2, 56:6, 74:23, 75:2, 76:1, 76:9, 79:2, 80:16, 80:20, 82:8, 83:13 thinking 48:2, 71:18 thorough 38:5 three 19:3, 31:7, 31:8, 31:11, 56:4, 56:9, 60:15, 60:19, 60:23 through 15:17, 42:5, 73:22 throughout 26:10, 61:25, 62:13 time 6:8, 6:9, 7:24, 8:4, 13:14, 17:13, 18:2, 18:13, 18:21, 19:7, 19:8, 19:9, 19:12,
T			
tablet 11:11 take 9:25, 13:11, 13:15, 23:3, 26:6, 28:5, 29:19, 42:25, 46:21, 47:1, 47:3, 54:20, 56:3, 57:13, 62:22, 63:4, 63:15, 81:11, 83:4 taken 2:3, 17:19, 25:11, 29:7, 30:3, 84:7, 84:10 takes 29:3, 30:5 taking 6:12, 8:4, 9:16, 33:11, 63:23 tale 54:12			

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>19:14, 20:9, 21:1, 21:16, 22:24, 22:25, 24:4, 25:16, 25:22, 27:8, 29:11, 30:12, 31:6, 32:18, 33:8, 33:9, 33:10, 34:10, 35:24, 37:7, 38:13, 42:21, 43:4, 43:6, 43:9, 45:22, 48:11, 54:1, 54:8, 54:15, 56:11, 56:14, 58:9, 59:21, 60:21, 62:20, 65:3, 65:17, 65:18, 65:24, 66:9, 66:11, 66:13, 67:9, 67:10, 67:14, 68:18, 70:9, 72:10, 75:25, 81:22, 83:20 times 26:16, 26:20, 26:22, 31:8, 31:11, 48:8, 48:11, 59:19, 59:24, 60:10, 60:11, 60:12, 60:13, 60:20, 61:22, 61:25, 62:1 tina 4:3, 6:24 tiny 41:12 today 6:10, 7:4, 8:13, 8:17, 9:1, 10:12, 10:20, 14:6, 14:24 today's 6:8 together 30:24, 37:14</p>	<p>toilet 41:7, 43:22 told 23:19, 40:13, 40:19, 53:8, 53:14, 54:12, 73:6, 73:12, 74:6, 75:4, 81:6, 81:16 took 25:15, 33:22, 35:18, 35:20, 35:23, 36:12, 55:12 tool 31:1 tools 42:16, 43:24, 63:4, 63:7, 63:19, 64:2, 64:6 topics 46:4 touching 55:7 traffic 65:1 train 25:10 trained 25:9 training 21:1, 21:8, 27:3, 27:7, 53:24, 73:23 trainings 25:13 transactions 46:7, 63:10 transcript 5:8, 84:8 transgender 20:15, 20:19, 21:2, 21:9, 22:8 transportation 32:13 trash 67:21</p>	<p>trial 11:5 trouble 82:8 true 84:8 truth 73:17, 81:9, 81:11 try 9:18, 13:11, 13:12, 27:4, 27:9, 49:15 trying 33:1, 77:21 tuesday 1:14 turn 11:24, 12:13, 53:4, 56:18, 62:5, 77:9 turned 40:5, 64:7 turning 12:2 turns 64:13 two 19:2, 19:3, 40:10, 43:7, 47:3, 56:4, 56:8, 56:15, 60:16, 60:19, 60:23, 82:23, 83:21 typewriting 84:11 typically 26:13, 62:21, 63:18, 64:25, 67:20</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 10:1, 15:19 uh-uh 46:2, 77:7 under 10:11, 18:12,</p>	<p>18:13, 18:24, 24:25, 79:1, 84:11 understand 8:16, 10:5, 10:11, 11:1, 11:4, 28:3, 65:14, 79:17 understood 10:9, 66:14 unfair 27:10 unfortunately 24:10 unit 7:24, 16:12, 16:13, 16:17, 17:8, 30:11, 34:25, 63:18, 63:21, 64:3, 65:1, 67:7 united 1:1 units 63:17 university 15:10 unless 13:5 unprofessional 74:12, 74:20 unsafe 37:3, 37:6, 37:11 until 17:6, 63:5 use 13:13, 27:20, 30:25, 42:18, 42:21, 75:23, 78:10 usually 19:2, 26:3, 29:3, 38:7, 42:20, 61:19, 64:1, 66:12 utility 68:1, 68:3</p>
--	---	--	--

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p style="text-align: center;">V</p> <p>valdosta 17:2, 20:12</p> <p>verbal 10:2, 29:4</p> <p>verbally 31:9</p> <p>verbiage 66:21, 66:24, 74:16</p> <p>verify 63:5</p> <p>versus 6:4</p> <p>via 6:12</p> <p>video 6:9, 6:11</p> <p>videographer 4:12, 6:2, 6:10, 7:3, 43:3, 43:6, 56:10, 56:14, 83:16, 83:19</p> <p>videotaped 1:12, 2:2, 6:3</p> <p>virtual 1:12, 2:2</p> <p>visible 47:16</p> <p>voice 52:19</p> <p>voice-identify 6:13</p> <p>voices 50:20, 57:15</p> <p>vorkapic 1:23, 2:4, 7:4, 84:3, 84:22</p> <hr/> <p style="text-align: center;">W</p> <p>walked 46:20, 47:17</p> <p>wall 41:8</p> <p>want 8:5, 9:13,</p>	<p>14:10, 17:10, 31:3, 35:4, 36:7, 36:17, 49:18, 56:4, 60:7, 82:25</p> <p>washington 3:12</p> <p>watched 74:10</p> <p>watches 59:8</p> <p>wax 67:22</p> <p>way 26:23, 45:19, 54:13, 61:9</p> <p>ways 32:5</p> <p>we'll 13:11, 31:12, 31:15</p> <p>we're 11:7, 11:25, 18:19, 28:4, 35:5, 43:7, 56:11, 56:15, 57:3, 61:6, 61:7, 62:7, 81:18, 83:19</p> <p>we've 8:6, 42:23, 43:15, 55:10</p> <p>weedon 4:10, 28:10, 29:17, 50:14, 57:7</p> <p>week 26:20, 26:22</p> <p>weekly 26:20</p> <p>went 18:9, 36:20, 54:11, 74:5, 76:13, 82:25</p> <p>whatever 24:12, 43:24</p> <p>whatsoever 78:14</p>	<p>whenever 19:15, 38:3</p> <p>whereof 84:16</p> <p>whether 74:18, 74:19, 76:23, 80:1</p> <p>whichever 18:1, 21:5, 21:10, 21:13</p> <p>whoever 32:10</p> <p>window 42:6</p> <p>within 17:25, 75:11</p> <p>without 13:12, 37:8, 41:24, 70:18</p> <p>witness 7:7, 7:10, 7:12, 22:13, 22:17, 40:4, 45:5, 46:25, 47:6, 47:22, 49:12, 50:13, 54:4, 58:4, 58:13, 67:13, 70:21, 71:24, 72:3, 74:15, 75:18, 78:2, 79:13, 79:25, 82:11, 84:16</p> <p>wondered 66:24</p> <p>word 31:6, 36:6</p> <p>words 35:11, 46:13, 48:13, 70:23</p> <p>work 15:3, 15:5, 15:6, 16:1, 16:2, 26:23, 26:24, 32:16, 32:17, 32:18, 49:2</p> <p>workday 26:24</p>	<p>worked 15:25, 16:25, 18:6, 26:24, 26:25, 55:21</p> <p>working 24:16, 63:3, 64:3</p> <p>works 14:15</p> <p>wouldn't 10:19, 47:1, 47:7, 69:16</p> <p>write 40:20, 53:8, 62:5, 62:11</p> <p>written 29:6, 31:10</p> <p>wrong 53:20</p> <p>wrote 29:9, 40:4</p> <hr/> <p style="text-align: center;">Y</p> <p>yeah 46:13, 60:12</p> <p>year 16:14, 17:6</p> <p>years 20:21, 21:6, 79:2, 79:3</p> <p>yo 58:16</p> <hr/> <p style="text-align: center;">Z</p> <p>zoom 6:12, 11:15</p> <hr/> <p style="text-align: center;">0</p> <p>00 60:1, 60:5, 60:6, 60:7, 60:8</p> <p>02 83:20</p> <p>03 28:9, 50:8, 57:6, 83:22</p> <p>0577 5:12, 28:1</p>
--	--	--	---

Transcript of Shanita McCall
 Conducted on March 22, 2022

<p>084 84:4</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 29:15, 31:19, 60:7</p> <p>10 43:1, 56:11, 56:14, 59:24, 60:10, 60:22, 61:16, 64:18, 70:15, 78:20, 79:7, 79:11, 79:22, 80:14, 81:22, 82:5, 82:19</p> <p>100 3:19</p> <p>11 56:11, 60:7, 60:8, 83:20, 83:22</p> <p>1287 3:6</p> <p>1414 3:14</p> <p>1441 5:14, 57:2</p> <p>1447 5:13, 50:4</p> <p>15 19:4, 52:7</p> <p>16 56:14</p> <p>18 15:14, 15:15</p> <p>19 17:3</p>	<p>16:6, 16:9, 17:3</p> <p>2008 15:20</p> <p>2015 15:13</p> <p>2018 17:3</p> <p>2019 17:10</p> <p>2020 59:25, 60:10, 61:16, 63:24, 64:18, 70:15, 78:20, 79:11, 79:22, 80:8, 80:14, 82:19</p> <p>2021 17:11</p> <p>2022 1:14, 6:8, 28:9, 50:8, 57:6, 84:18</p> <p>2023 84:19</p> <p>22 1:14, 6:8, 28:9, 50:8, 57:6</p> <p>221 3:8</p> <p>2589 84:4</p> <p>28 5:12</p> <p>281 3:21</p> <p>288 3:19</p>	<p>304 4:7</p> <p>334 3:14</p> <p>34 43:4</p> <p>36104 3:13</p> <p>37 1:15</p> <p>378 1:7, 6:7</p> <p>38 6:9</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 60:8</p> <p>40 4:5</p> <p>400 3:12</p> <p>404 3:8, 3:21, 4:7</p> <p>4055 3:21</p> <p>437058 1:21</p> <p>4424 4:7</p> <p>45 43:1</p> <p>46 43:6</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 60:1, 60:6</p> <p>50 5:13</p> <p>57 5:14</p> <p>58 5:4</p> <p>5876 3:8</p> <p>5:-cv--mtt 1:7, 6:7</p>	<hr/> <p style="text-align: center;">6</p> <hr/> <p>6 60:8</p> <p>604 3:14</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7ish 66:2</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 1:15, 6:9, 60:6, 60:8</p> <p>84 1:22</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 43:4, 43:6</p> <p>9th 80:6</p>
<hr/> <p style="text-align: center;">2</p> <hr/> <p>20 1:7, 1:14, 6:7, 6:8, 15:15, 15:16, 19:4, 28:9, 50:8, 57:6</p> <p>2007 15:20, 15:25,</p>	<hr/> <p style="text-align: center;">3</p> <hr/> <p>3 60:1, 60:5</p> <p>30 84:17</p> <p>30009 3:20</p> <p>30031 3:7</p> <p>30334 4:6</p>		